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# THE GEORGE WASHINGTON UNIVERSITY

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WASHINGTON, DC

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Ms. Rochelle Martinez, Senior Statistician  
Statistical and Science Policy Branch  
Office of Management and Budget  
Washington, DC 20230

Via email: [rmartinez@omb.eop.gov](mailto:rmartinez@omb.eop.gov) and [OIRA\\_Submission@omb.eop.gov](mailto:OIRA_Submission@omb.eop.gov)

Dear Ms. Martinez,

I appreciate the opportunity to respond to the Census Bureau's request for comments (*Federal Register*, June 24, 2015) regarding its proposal for American Community Survey (ACS) Methods Panel Tests, submitted for review by your office on June 30, 2015 (ICR Reference No: 201506-0607-004).

As a research professor at the George Washington Institute of Public Policy, George Washington University, I focus on federal policies that support U.S. economic competitiveness. From that perspective, I believe that the ACS is an essential resource for enabling the nation's economic well-being. My research indicates that uses of ACS data are deeply embedded in the operations of U.S. public and private sectors and, as a result, substantially improve the functioning of the nation's economy.<sup>1</sup> Further, my research shows, the ACS and its predecessors have been used to guide federal policy and programs since questions for purposes other than apportionment were included in the 1790 Census at the suggestion of Rep. James Madison.<sup>2</sup>

The conduct of ACS Methods Panel Tests during 2016-2018 is essential for improving the reliability and value of ACS data through the development of more effective means for promoting complete and accurate household responses on subjects of national and community

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<sup>1</sup> See "[Surveying for Dollars: The American Community Survey's Role in Federal Funding](#)," Brookings Institution Metropolitan Policy Program, July 2010 and "Federal Statistical Products Based on the Census Bureau's American Community Survey: A Reference Guide," draft for comment (attached), July 2015. The 2010 study is the basis for the Census Bureau's assertion that the ACS guides the geographic allocation of over \$400 billion in federal funding annually.

<sup>2</sup> See "[Article 1, Section 2, Clause 3: James Madison, Census Bill, House of Representatives](#)," Founders Constitution, University of Chicago Press (web). "Mr. Madison Observed that they had now an opportunity of obtaining the most useful information for those who should hereafter be called upon to legislate for their country if this bill was extended so as to embrace some other objects besides the bare enumeration of the inhabitants; it would enable them to adapt the public measures to the particular circumstances of the community. In order to know the various interests of the United States, it was necessary that the description of the several classes into which the community was divided, should be accurately known; on this knowledge the legislature might proceed to make a proper provision for the agricultural, commercial and manufacturing interests, but without it they could never make their provisions in due proportion."

importance. I believe the ACS Methods Panel Tests are particularly important for identifying ways to better legitimize the ACS and specific questions in the eyes of the public and their congressional representatives. Development of such knowledge is vital in light of recent amendments approved by the House of Representatives to terminate ACS funding or the mandatory response on the basis of arguments about lack of legitimacy. Consequently, I very much support OMB's approval of the Census Bureau's request.

Supporting Statement Part A for this ICR indicates that "[t]he design of the mail materials proposed for these tests are based on the key findings from" a recent Census Bureau research and evaluation report, "American Community Survey Messaging and Mail Package Assessment Research: Cumulative Findings," prepared by Census contractor "Team Reingold" on December 19, 2014.<sup>3</sup> However, my review of this document suggests that the Methods Panel Tests as proposed in the ICR differ from the findings of the Team Reingold report in several ways.

Specifically, the "Key Findings and Implications" section of the research and evaluation report provides the following findings that, I believe, are not fully addressed in the proposed plans for the ACS Methods Panel Tests.

- Emphasize effective "mandatory" messaging
- Demonstrate benefits of ACS participation to local communities
- Draw a clearer connection between objectionable questions and real-world applications and benefits
- Utilize local influencers as trusted messengers
- Having the right tools and training is key to persuading respondents in the field<sup>4</sup>

Through this letter, I bring these differences to OMB's attention and suggest responses for its consideration. I also offer ways that the Methods Panel Tests might be improved in addition to those suggested by Team Reingold.

I discuss my various observations in the sections below.

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<sup>3</sup> This report was disseminated by James Treat, Chief, ACS Office in memo [ACS 14-RER-30](#), January 8, 2015. The report was prepared by "Team Reingold," comprised of Reingold, Decision Partners, and PennSchoenBerland. "Between October 2013 and November 2014, Team Reingold supported the U.S. Census Bureau's American Community Survey Office (ACSO) in conducting a series of related research studies aimed at improving the design of the American Community Survey (ACS) mail package and messaging toward potential ACS respondents. . . .The goals of this research were:

- To develop and test messages and mail package designs to increase ACS self-response rates, thereby decreasing the expense of costly follow-up outreach to non-responders
- To obtain insights to support general outreach, data dissemination, materials development, and call center and field operations"

<sup>4</sup> Team Reingold report, pp. 14-17.

## Mandatory Response Message

The Team Reingold report says:

In numerous studies, we found the “required by law” message to be the single most effective message in attracting attention and motivating participants to complete the survey. This largely confirms existing Census research.

In our online visual testing, the “mandatory” message clearly caught participants’ attention in envelopes, letters, instruction cards, and reminder notices. For example, nine in ten respondents highlighted the words “required by law” in the Official pre-notice letter — which was more than three times greater than the next-most identified words.

Interestingly, in our mail package focus groups and interviews, we found these messages to be a strong motivator both for more altruistic individuals who said they would fill out the survey willingly and for those who admitted they would do it only because they were required to.

Moreover, we saw little resistance to the idea of *more* and *earlier* legal warnings, including the threat of a fine. Frequently, participants — even more clearly cynical individuals — volunteered that strongly worded warnings should be conveyed early and often if the Census Bureau expects recipients to respond in a timely manner.

As could be expected, there were a few individuals who bristled at the mandatory nature of the survey, especially among those admittedly distrustful of the government. For such individuals, it may be useful to more clearly make the case for *why* completing the survey is mandatory – in terms of generating accurate data to best serve communities, etc.

In the proposed Methods Panel Tests, the Census Bureau seeks to examine a very different hypothetical dynamic, that “softening” the mandatory response message will increase the response rate. In contrast to Team Reingold’s finding that “we saw little resistance to the idea of more and earlier legal warnings, including the threat of a fine,” Methods Panel Tests Supporting Statement Part A indicates: “First, in response to respondent concerns about prominent references to the mandatory participation in the ACS, the Census Bureau plans to test methods to soften the mandatory messages while emphasizing the benefits of participation in the survey.” (p. 3)

I am confused about the reason for the significant divergence between the Team Reingold finding and the Census Bureau test. Consequently, I encourage OMB to:

- be sure it understands the Census Bureau’s basis for choosing the proposed path and

- see that the Census Bureau tests Team Reingold’s preferred scenario—combining “more and earlier legal warnings” with compelling neighborhood information about the community benefits of the ACS.

### Identification of Community Benefits of ACS

Team Reingold makes quite clear its belief that ACS response rates will improve if ACS materials describe the benefits of the ACS to each respondent’s neighborhood.

Several of our studies suggested that participants evaluate the ACS foremost in terms of tangible, visible benefits to their local communities — such as improvements to roads, schools, and hospitals. We found that participants were often more interested in potential benefits for their own neighborhoods than for the nation, their states, or even their cities. . . .

While secondary to punitive messages in their impact on motivating response, altruistic messages about the benefits of participation for one’s community were more likely to inspire goodwill and create positive associations to the survey. . . .

Many participants, especially those distrustful of government, objected to seemingly obscure questions — including those about household plumbing, commute time, etc. — as being overly intrusive or irrelevant, and such questions frequently brought them to question the legitimacy and importance of the survey.

If individuals better understood the purposes or direct applications of seemingly irrelevant ACS questions, they may be less defensive and more inclined to self-respond. ACS materials should demonstrate the practical applicability of objectionable ACS questions, tying them directly to their use by some meaningful government program or service.

And repeated from the prior section:

As could be expected, there were a few individuals who bristled at the mandatory nature of the survey, especially among those admittedly distrustful of the government. For such individuals, it may be useful to more clearly make the case for why completing the survey is mandatory – in terms of generating accurate data to best serve communities, etc.

On the basis of its Refinement Survey, Team Reingold recommends that Census include a short message in the introductory ACS letter indicating that “state and local leaders could use ACS data to build roads, schools, and hospitals.” As a result, it appears, ACS Methods Panel test materials contain one of the following phrases:

- 1) Communities across the country rely on information from this survey to decide where important services are needed, including:

- Improving roads and reducing traffic
  - Building schools
  - Planning for the health care needs of the elderly
- 2) This survey collects critical up-to-date information used to meet the needs of communities across the United States. For example, results from this survey are used to decide where new schools, hospitals, and fire stations are needed. This information also helps communities plan for the kinds of emergency situations that might affect you and your neighbors, such as floods and other natural disasters.

Team Reingold also recommends that the Census Bureau include a newly designed brochure (part of the ICR package) that responds to a header question “Why Do We Ask Certain Questions?” with short explanations about the uses of answers to questions on name, disability, plumbing and kitchen facilities, income, home value or rent payment, occupation, journey to work, and education.

Team Reingold comes to its recommendations on the basis of these conclusions:

After initial messaging studies, Team Reingold hypothesized that it may be valuable to customize and geographically target ACS materials to speak to local benefits in respondents’ areas (our best available and most feasible proxy was federal dollars allocated to states on the basis of ACS data). However, upon further testing, we conclude that the benefits of mass customization are likely not worth the added operational difficulties. It is possible that providing information about state-level benefits is not granular enough for respondents to connect ACS participation with real-world benefits “before their eyes.”

I do not dispute Team Reingold’s findings regarding the type of information that ACS participants most respond to (that is, at the neighborhood level). However, I believe that the Team Reingold action recommendations are insufficiently vigorous and that the Census Bureau should examine the impact of approaches with potential to yield higher response rates.

I believe the short generic “one size fits all” benefits text in the introductory letters does not fit the circumstances of many communities. For instance, mention of data to “decide where new schools, hospitals, and fire stations are needed” is unlikely to make sense in communities that are not growing.

In addition, I find the list of benefits tested by Team Reingold in the Refinement Survey and communicated in the test materials (report pp. 37-38) to be circumscribed and not representative of the full set of ACS benefits. For instance, Team Reingold did not test reactions to mention of uses of the ACS to:

- attract businesses to the community guide on the basis of data on potential customers and workforce

- help businesses and nonprofit organizations offer goods and services that match community needs
- design legislative districts for local, state, and federal governments
- enable legislative representatives to better understand community circumstances<sup>5</sup>
- assure voting rights
- determine regional cost-of-living data

Consequently, I suggest that OMB consider asking the Census Bureau to test response rates to a broader array of short generic messages on benefits that are matched to each test community's particular circumstances (for example, income, race/ethnicity, unemployment).

I appreciate Team Reingold's finding that respondents are most motivated by neighborhood benefits and that there are significant "operational difficulties" in providing each respondent household with data customized for that community. At the same time, I encourage OMB to consider asking the Census Bureau to create a test of response to state-specific information.<sup>6</sup> I suggest that, rather than provide a state-specific benefits insert in the ACS mail package, the Census Bureau provide each respondent household with the link to a webpage that lists example public and private uses of the ACS in that state.

### Testimonials from Local Influencers

Team Reingold indicates:

In our Key Informant Interviews, leaders active with high-interest populations (low-income, minority, non-English, etc.) continually stressed the importance of communicating the value of ACS through trusted community channels.

Community leaders and organizations have greater trust built up in the community and are likely more credible messengers about local benefits from participation in the ACS than the Census Bureau.

It may also be worthwhile to include testimonials from trusted local figures in ACS materials. Doing so could positively dispose respondents to the survey and concisely illustrate tangible community benefits of ACS participation.

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<sup>5</sup> Rep. Madison named this reason as his motivation for proposing the first precursor to the ACS.

<sup>6</sup> Team Reingold: "It is possible that providing information about state-level benefits is not granular enough for respondents to connect ACS participation with real-world benefits "before their eyes." (p. 15) This suggests that, alternately, state-level benefits might be granular enough and so are worthy of testing.

Team Reingold’s observation is reinforced by Census Bureau research that shows the positive impacts the Census Partnership Program has had on decennial response rates.<sup>7</sup>

As far as I can tell, the ACS Methods Panel Tests materials do not reflect implementation of Team Reingold’s suggestion “to include testimonials from trusted local figures in ACS materials.” Consequently, I suggest that OMB ask the Census Bureau to identify how it might test this idea as part of this information collection. If the Census Bureau were to create a series of state-specific webpages describing ACS benefits, it might include testimonials from state and local officials on those webpages.

Alternatively, OMB might consider asking Census to test the impact of an ACS version of the decennial Census Partnership Program on local response rates.

### Tools and Training for ACS Field Staff

Team Reingold indicates:

Resources available to field personnel are often insufficient to the communications challenges they face. Data collectors report they often have to work hard “on the fly” to convey the relevance of the ACS to the respondent and underscore the importance of participating.

It will be valuable to equip staff with messages, materials, and training that enable them to underscore ACS’ relevance—particularly at the local community level—for respondents and other stakeholders.

Again, as far as I can tell, the proposed ACS Methods Panel Tests do not include a test of equipping “staff with messages, materials, and training that enable them to underscore ACS’ relevance.” I suggest that OMB ask the Census Bureau to identify how it might test this idea as part of this information collection.

### Beyond the Team Reingold Report

For OMB’s consideration, I have several suggestions for Methods Panel-related efforts in addition to those identified by the Team Reingold report.

First, in the test FAQ brochure, I suggest adding two sentences. The first question would say that the ACS is the current iteration of a federal data collection first conceived by James Madison in 1790. This information would convey that the ACS has a long and continuous history and was started by the Father of the Constitution.

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<sup>7</sup> William T. King and David L. Wycinsky Jr., “2010 Census Integrated Communications Program National Partnership Assessment Report,” August 1, 2012, as distributed by [2010 Census Planning Memoranda Series, No. 228](#), August 8, 2012.

The second sentence would indicate that the questions on the ACS are reviewed by Congress, as required by law. This information would convey that the ACS is conducted with congressional oversight.

My hypothesis that response rates will improve if respondents understand that the ACS has long-standing historical and legislative legitimacy.

Second, if the Census Bureau creates state-specific webpages as I proposed earlier, I suggest that those pages also include the ACS response rates for communities within the state. As behavioral research regularly suggests, households are much more likely to act in a beneficial way if they believe their neighbors are doing likewise.<sup>8</sup>

Third, and consistent with the last two points, I encourage OMB to direct the Census Bureau to carry out additional behavioral research on methods for improving ACS response rates. With regards to social norms, I suggest Census review recent work by Richard McAdams that suggests that laws regulating behavior (such as the law mandating an ACS response) work less because of fear of punishment and more because such laws signal a social norm. It seems valuable for the Census Bureau to better understanding the social norm implications of the mandatory response language.<sup>9</sup>

In addition, I suggest that OMB encourage the Census Bureau to consider engaging the services of the new Social and Behavioral Sciences Team (SBST) operating out of the White House Office of Science and Technology Policy. Colloquially known as the “Nudge Unit,” after the title of the book by Cass Sunstein and Richard Thaler, and modeled after a similar unit in the United Kingdom, the SBST is composed of “leading experts who have been recruited into government to harness behavioral science insights to help Federal government programs better serve the nation while saving taxpayer dollars.”<sup>10</sup>

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<sup>8</sup> See, for instance, WaterSmart Software, [“Tapping into the Power of Behavioral Science: Insights & Opportunities for Water-Use Efficiency,”](#) February 2015. “The power of social influence is particularly evident in individuals’ tendency to adhere to social norms: beliefs about what other people are doing, and what they approve or disapprove of. Social norms constitute a social standard from which people typically do not want to deviate.” Also, Hunt Allcott and Sendhil Mullainathan, [“Behavior and Energy Policy,”](#) *Science*, March 5, 2010, Vol. 327 no. 5970 pp. 1204-1205. “Recent work by a company called OPOWER, informed by academic work showing the power of social comparisons in environmental conservation, suggests that behavioral programs can be cost-effectively scaled to millions of households. OPOWER sends home energy-use reports to electricity and gas consumers that display the household’s energy consumption, compare it with that of similar households, and provide energy conservation tips. Using randomized, controlled trials with hundreds of thousands of utility customers across the United States, these reports have been shown to reduce electricity consumption in the average household by over 2%.”

<sup>9</sup> Richard H. McAdams, *The Expressive Powers of Law: Theories and Limits*, Harvard University Press, 2015. “In short, law provides information; information changes beliefs; new beliefs change behavior. Law is informative.” (p. 136)

<sup>10</sup> Maya Shankar, [“Using Behavioral Science Insights to Make Government More Effective, Simpler, and More People-Friendly,”](#) Office of Science and Technology blog, February 9, 2015. The United Kingdom organization is the

In light of ongoing efforts by members of Congress to terminate the ACS or mandatory response, I believe it is imperative for the 2016-18 ACS Methods Panel Tests to develop new knowledge useful in improving the public's understanding of the value of the ACS to their communities and the nation. I appreciate the opportunity to provide comments regarding ways of creating such knowledge, hope you find them helpful, and look forward to the OMB's response.

Sincerely,

A handwritten signature in black ink that reads "Andrew Reamer". The signature is written in a cursive, flowing style.

Andrew Reamer  
Research Professor

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[Behavioural Insights Team](#) (BIT). Initially a unit of national government, the BIT has spun out as a private organization and is setting up [BIT North America](#) in New York.