

February 12, 2018

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14<sup>th</sup> and Constitution Avenue NW  
Washington, D.C. 20230

**Re: Request for comments on proposed changes to question wording for the American Community Survey**

On behalf of the Center for American Progress (CAP), we are writing this letter in response to the Notice 82 FR 58378 published in the Federal Register on December 12, 2017, which seeks comment regarding proposed changes to question wording in the American Community Survey (ACS).

CAP is a non-partisan think tank dedicated to improving the lives of Americans through bold, progressive ideas and action. As part of its core mission, CAP conducts research and develops new policy ideas that help enhance the economic security of Americans, boost their opportunities for advancement, and promote equality.

High-quality data that provide up-to-date information about people in the United States—including their levels of prosperity, educational and employment opportunities, participation in public assistance programs, and much more—is essential to the work of CAP. Thus, we have consistently advocated for adequate federal funding for existing data collection efforts, increased data collection on topics that suffer from insufficient information, and questions that reflect the changing landscape of this country. The ACS has been critical to this effort, enabling us to identify which pockets of the country suffer from a lack of child care options,<sup>i</sup> how changes to our nation's healthcare system would impact veterans,<sup>ii</sup> and much more.

**Health Insurance**

The additional questions regarding premiums and subsidies represent an improvement to the survey's utility for policy evaluation and policymaking, and these changes come after years of consideration and formal testing by the Census Bureau.<sup>iii</sup> The two new questions have “yes” and “no” as possible responses; the first question asks whether the person pays a premium for coverage, and the second question asks whether the person receives a subsidy or tax credit to pay for the premium. These additional questions in the 2019 ACS will assist researchers in tracking who is receiving subsidized Marketplace coverage through the Affordable Care Act. The ACS currently asks respondents about health insurance type but not subsidies or premiums.

The other notable item in Notice 82 FR 58378 is that the Census Bureau will retain the current version of the ACS health insurance coverage question following content testing of alternative versions. Although a Census Bureau's content test report concluded that modifications to the health insurance question prompt, response wording, and response order did not improve the ACS's undercount of Medicaid<sup>iv</sup> and overcount of direct purchase coverage,<sup>v</sup> CAP is encouraged by the Census Bureau's efforts to monitor and ameliorate these issues.

## **Journey to Work**

While CAP supports the proposed changes to the ACS regarding commutes, we encourage the Department of Commerce to structure future surveys to allow respondents to select multiple options to describe how they get to work. In large metropolitan areas especially, people are more likely to vary how they commute based on the day and take multiple modes of transit. Because the existing question asks how an individual usually got to work in the previous week, and which mode covered the most distance, the survey may lead to an undercount in certain modes of transportation, especially non-motorized means of transit which commonly cover shorter distances.

## **Relationships**

CAP supports the Census Bureau's testing of revised relationship questions to improve the estimates of coupled households, and we are particularly interested in an accurate count of same-sex couples. Same-sex couples are part of the LGBT community. Developing high-quality data that more fully explore and facilitate understanding of the socioeconomic and other circumstances of being LGBT in the United States today is essential if federal, state, local, and nongovernmental entities are to adequately and efficiently serve LGBT individuals and their families. The data that have been collected on sexual orientation and gender identity reveal that LGBT people face unique challenges, including experiencing high rates of physical and sexual violence,<sup>vi</sup> facing health disparities that regularly prove lethal,<sup>vii</sup> and higher rates of food insecurity.<sup>viii</sup> For these reasons, CAP applauds the Department for testing and adopting the new relationship language recommended by the Interagency Working Group on Measuring Relationships in Federal Household Surveys (MRFHS).<sup>ix</sup> These changes will more reliably and accurately identify same-sex couples, and the positioning of the unmarried options is also an important acknowledgement of the diversity of U.S. families.<sup>x</sup>

Despite this improvement, CAP remains concerned that the Department continues to exclude sexual orientation and gender identity from the ACS, despite a clear programmatic need for such data collection articulated by several agencies. The inclusion of sexual orientation and gender identity ("SOGI") as a planned topic for the 2019 ACS was a step towards data collection that was more inclusive of the LGBT community. However, the inexplicable removal of SOGI questions from the revised Subjects Planned for the 2020 Census and American Community Survey document was a step backwards. In the interest of assuring that the LGBT community is accurately counted and has its needs met, the Census Bureau must revisit this decision.

## **Retirement Income**

Given the erosion of defined benefit plans and the proliferation of defined contribution retirement plans in the United States, the proposed changes to questions regarding retirement income will help to capture a more comprehensive picture relative to the previous version, which focused largely on pensions. As such, CAP is supportive of these modifications, which respond to the reality of how today's retirees receive their income.

In addition to this improvement, CAP suggests that ACS also include a handful of checkboxes for the different sources of retirement income—including income from a previous employer, disability income, survivor benefits, 401(k) or 403(b) income, and more—and allow respondents to check all that apply, without having to break down the dollar amounts for each. These additions would provide researchers with the frequencies of the different sources of retirement income, in addition to the total dollar amount.

## Race and Hispanic Origin

The importance of accurate ACS data on race and ethnicity cannot be understated. Access to such data is a necessary component for identifying disparities and inequalities, as well as crafting policy solutions to address them. CAP has used ACS data to study a wide range of racial justice issues, including diversity in the tech industry<sup>xi</sup> and the economic insecurity of unmarried women of color.<sup>xii</sup>

Further disaggregating race and ethnicity data would increase efficiency in spending, accuracy in research, and produce better-targeted policies, bringing critical resources to governments, policymakers, and researchers. To that end, CAP strongly supports providing a combined question option so that respondents can select multiple races and ethnicities. CAP also supports accurate questions to identify people who consider themselves to be Middle Eastern and North African or Asian American and/or Pacific Islander. In late January, the Census Bureau suggested that the Trump administration may not support Obama-era proposals to improve data collection on race and ethnicity. This would undermine information about, and policy interventions for, underserved communities for another decade. To better promote justice and equality in society, the Census Bureau must recommit to full, accurate, comprehensive collection of race and ethnicity data for the ACS.

The American Community Survey provides essential information on a wide range of topics and thus has been an invaluable resource for CAP as well as other research organizations, academics, local and state governments, and businesses. While many of the proposed question changes are beneficial, additional improvements—particularly with respect to improved measurement of demographic information—are essential in order for the ACS to efficiently and effectively provide data on the entirety of the U.S. population. CAP strongly urges the Department of Commerce to heed the advice of researchers and to include these key questions.

Thank you for the opportunity to submit comments. Please do not hesitate to contact us at [kgallagherrobbins@americanprogress.org](mailto:kgallagherrobbins@americanprogress.org) to provide further information.

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<sup>i</sup> Rasheed Malik and Katie Hamm, “Mapping America’s Child Care Deserts” (Washington: Center for American Progress, 2017), available at <https://cdn.americanprogress.org/content/uploads/2017/08/29111723/ChildcareDesert-report1.pdf>.

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- <sup>ii</sup> Rachel West, Katherine Gallagher Robbins, and Rejane Frederick, “The Impact of the AHCA on Veterans: State-by-State Breakdown” (Washington: Center for American Progress, 2017), available at <https://www.americanprogress.org/issues/poverty/news/2017/06/22/434928/impact-ahca-veterans-state-state-breakdown/>.
- <sup>iii</sup> Edward Berchick, “2016 American Community Survey Content Test: Health Insurance” (Washington: U.S. Census Bureau, 2017), available at [https://www.census.gov/library/working-papers/2017/acs/2017\\_Berchick\\_01.html](https://www.census.gov/library/working-papers/2017/acs/2017_Berchick_01.html).
- <sup>iv</sup> Joanna Turner, “Medicaid Undercount in the American Community Survey” (State Health Access Data Assistance Center, 2013), available at <http://www.shadac.org/publications/medicaid-undercount-american-community-survey>.
- <sup>v</sup> Joanna Turner and Michel Boudreaux, “Health Insurance Coverage in the American Community Survey: A Comparison to Two Other Federal Surveys” (Washington: National Academies Press, 2010), available at <https://www.ncbi.nlm.nih.gov/books/NBK209623/>.
- <sup>vi</sup> Michelle A. Marzullo and Alyn J. Libman, “Hate Crimes and Violence Against Lesbian, Gay, Bisexual and Transgender People” (Washington: Human Rights Campaign, 2009), available at [https://assets2.hrc.org/files/assets/resources/Hatecrimesandviolenceagainstlgbtpeople\\_2009.pdf](https://assets2.hrc.org/files/assets/resources/Hatecrimesandviolenceagainstlgbtpeople_2009.pdf).
- <sup>vii</sup> Karen I. Fredriksen-Goldsen and others, “The Aging and Health Report: Disparities and Resilience among Lesbian, Gay, Bisexual, and Transgender Older Adults” (Seattle: Institute for Multigenerational Health, 2011), available at <http://www.age-pride.org/wordpress/wp-content/uploads/2011/05/Full-Report-FINAL-11-16-11.pdf>.
- <sup>viii</sup> Taylor N. T. Brown, Adam P. Romero, and Gary J. Gates, “Food Insecurity and SNAP Participation in the LGBT Community” (Los Angeles: The Williams Institute, 2016), available at <http://williamsinstitute.law.ucla.edu/wp-content/uploads/Food-Insecurity-and-SNAP-Participation-in-the-LGBT-Community.pdf>.
- <sup>ix</sup> Interagency Working Group on Measuring Relationships in Federal Household Surveys (MRFHS), “Improved Measurement of Household Relationships in Federal Surveys: Paper 1. Measuring Same-Sex Co-Residential Relationships” (2014), available at [https://s3.amazonaws.com/sitesusa/wp-content/uploads/sites/242/2014/04/MRFHS\\_StatisticalPolicyWorkingPaper201408.pdf](https://s3.amazonaws.com/sitesusa/wp-content/uploads/sites/242/2014/04/MRFHS_StatisticalPolicyWorkingPaper201408.pdf).
- <sup>x</sup> Moira Bowman and others, “Making Paid Leave Work for Every Family” (Washington: Center for American Progress, 2016), available at <https://www.americanprogress.org/issues/lgbt/reports/2016/12/01/292886/making-paid-leave-work-for-every-family/>.
- <sup>xi</sup> Maya Beasley, “There Is a Supply of Diverse Workers in Tech, So Why Is Silicon Valley So Lacking in Diversity?” (Washington: Center for American Progress, 2017), available at <https://www.americanprogress.org/issues/race/reports/2017/03/29/429424/supply-diverse-workers-tech-silicon-valley-lacking-diversity/>.
- <sup>xii</sup> Liz Weiss, “Unmarried Women of Color’s Unrealized Potential” (Washington: Center for American Progress, 2010), available at <https://www.americanprogress.org/issues/women/news/2010/08/09/8246/unmarried-women-of-colors-unrealized-potential/>.