



March 5, 2012

Honorable Trey Gowdy, Chairman
Honorable Danny Davis, Ranking Member
Subcommittee on Health Care, District of Columbia,
Census and National Archives
Committee on Oversight and Government Reform
Washington, DC 20515

Dear Chairman Gowdy and Congressman Davis:

We are writing to express our strong concern about proposals to convert the U.S. Census Bureau's American Community Survey (ACS) from a mandatory to a voluntary survey. We believe such a change would significantly increase the cost of the ACS; at a time of fiscal constraint, lack of sufficient resources could diminish the quality of ACS data to a point where the information is not useful for a myriad of critical public and private sector purposes. We know that your panel will review this issue at a hearing on March 6, 2012, and respectfully ask that the subcommittee include our letter in the official hearing record.

The Census Project is a non-partisan, ad-hoc, broad-based coalition of census stakeholders. The Project's participants include data users in the business, housing, civil rights, academic and research, civic participation, child advocate, state and local government, and marketing sectors. Our common purpose is simple: To educate policymakers and the public about the importance of high quality, cost-effective and appropriately comprehensive census data for sound decision-making at all levels of government and in the private and non-profit sectors. (The ACS is part of the decennial census.)

Concerned about respondent burden and the propriety of the questions, Congress directed the Census Bureau to explore the possibility of making the ACS voluntary in 2003. In two reports¹ and several more recent analyses, the bureau concluded that mail response rates to a voluntary ACS would drop "dramatically," by more than 20 percentage points. That decline, in turn, would force the bureau to use more costly modes of data collection, such as telephone and door-to-door visits, thereby *increasing the cost of the survey by thirty percent* (\$60 million at the time of the 2003 field test). Congress, in the current fiscal climate, is unlikely to increase

¹ "Meeting 21st Century Data Needs - Implementing the American Community Survey, Report 3: Testing the Use of Voluntary Methods" (Dec. 2003) (<http://www.census.gov/acs/www/Downloads/Report03.pdf>) and an update, "Report 11: Testing Voluntary Methods -- Additional Results" (Dec. 2004) (<<http://www.census.gov/acs/www/Downloads/Report11.pdf>>).

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funding for the ACS by the amount necessary to overcome low initial response rates, leaving the Census Bureau with insufficient response to produce reliable data for smaller (e.g. rural communities; towns; urban neighborhoods) areas and population groups (e.g. people with disabilities; veterans; immigrant groups). The consequence would be greatly diminished quality of ACS data. The test also showed that the percent of completed interviews (conducted if a household fails to mail back a form) fell significantly if the survey was voluntary, adding to the problem of data reliability.

Perhaps not surprisingly, cooperation in traditionally low mail response areas (which tend to equate with hard-to-count communities, such as people of color, low income families, and rural households) declined even further when ACS response was voluntary. Interestingly, a significantly higher percentage of traditionally easier-to-count populations, such as non-Hispanic Whites, failed to respond during the mail and telephone phases of the ACS. These findings suggest that the quality of estimates produced from a voluntary ACS would be severely jeopardized for all segments of the population and all types of communities.

The importance of high-quality, objective, and universal ACS data for public and private sector decision-makers cannot be overstated. The federal government alone allocates more than \$450 billion annually in program funds to state and local governments based in whole or in part on ACS data.² Federal law, directly or indirectly, requires all of the information gathered in the ACS (i.e. Congress requested the data directly, or created a program that relies on data for implementation, enforcement, or monitoring, and the census or ACS are the only sources). We should not jeopardize the fair and wise allocation of limited taxpayer dollars by undermining the only source of reliable data to guide those allocations, not to mention decisions on whether even to continue certain programs.

In addition, the Voting Rights Act relies on ACS data to make determinations under section 203, which requires jurisdictions with a high percentage of people who are not English language proficient to offer bilingual voting materials. Both the government and business sector rely on ACS data to help ensure appropriate employment opportunities for racial minorities, disabled persons, and veterans.

Equally important, businesses of all sizes rely on ACS data every day to make vital decisions about where to locate and expand, what goods and services to offer, the scope of employee training needed, and long term investment opportunities. Nonprofit organizations use the ACS to guide services to those most in need and to measure the success of their programs.

For these reasons, we urge your subcommittee to view any proposal to make the American Community Survey voluntary with great caution. Such a change would have serious adverse consequences that could leave the nation in a precarious decision-making vacuum and hinder its economic recovery and future growth.

² Reamer, Andrew, "Surveying for Dollars: The Role of the American Community Survey in the Geographic Distribution of Federal Funds," The Brookings Institution, July 2010.

Thank you for considering our views and for including our comments in the official hearing record.

Sincerely,

American Association for Public Opinion Research
American Planning Association
American Sociological Association
American Statistical Association
Asian American Justice Center, member of Asian American Center for Advancing
Justice
Association of Population Centers
Association of Public Data Users (APDU)
Charlotte (N.C.) Chamber of Commerce
Coalition on Human Needs
Community Action Partnership
Consortium of Social Science Associations
Council for Community & Economic Research (C2ER)
Council of Professional Associations on Federal Statistics
CREW Network
Great Lakes Inter-Tribal Council
Latino Census Network
Lawyers' Committee for Civil Rights Under Law
Leadership Conference on Civil and Human Rights
Marketing Research Association (MRA)
Moving Forward Gulf Coast, Inc.
National Association for Business Economics
National Association of Latino Elected and Appointed Officials (NALEO) Educational
Fund
National Congress of American Indians
National Education Association
National Institute for Latino Policy (NiLP)
National Low Income Housing Coalition
National Multi Housing Council
North Carolina Housing Finance Agency
Population Association of America
Population Reference Bureau
Prison Policy Initiative
Project Vote
South Asian Americans Leading Together (SAALT)
Southeast Michigan Census Council
State Library of North Carolina
Washington State Office of Civil Legal Aid