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 reports 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

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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. 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.

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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