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December 12, 2014

Jennifer Jessup
Departmental Paperwork Clearance Officer
Department of Commerce, Room 6616
14th and Constitution Avenue NW
Washington, DC 20230

Dear Ms. Jessup,

I write to respond to the October 31 Federal Register Notice, “Proposed Information Collection; Comment Request; The American Community Survey (ACS) Content Review Results,” to express the strong concern of the American Statistical Association for the removal of question number 12 on the undergraduate field of degree.

Question 12 is important to (i) the understanding of the STEM workforce in the United States; (ii) economic development and workforce research; and (iii) the National Science Foundation’s National Center for Science and Engineering Statistics (NCSES) for its National Survey of College Graduates (NSCG).

At the urging of NCSES (under direction from OMB to find ways to cut survey costs), question number 12 was added to the ACS in 2009 and serves as the sampling frame for the NSCG. This arrangement has saved NCSES tens of millions of dollars—as intended—as it doesn’t have to collect the information itself. Further, the collection of the field of degree information through the ACS was so efficient and effective that it allowed NCSES to discontinue the National Survey of Recent College Graduates. If the field of degree question were dropped from the ACS, not only would it cost NCSES millions of dollars to collect the information, it would also increase the survey burden on the public and potentially lower the data quality.

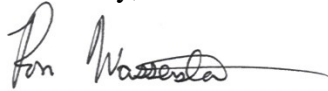
More generally, STEM workers are critical to the U.S. workforce because of their vital role in the innovation economy and boosting U.S. competitiveness. Therefore, the understanding of our

STEM workforce provided by ACS question 12 is an important part of our country's strategy for energizing our innovation economy and our international competitiveness.

These points and more were made in the letter from the Council of Professional Associations on Federal Statistics. The ASA is a member of COPAFS and we endorse their comments on this question.

We also note this question is viewed as being a light burden on respondents who take only nine seconds (on average) to respond to it. Given the light burden and the many benefits of including the question in the ACS, we urge OMB to keep question number 12 as part of the ACS.

Sincerely,

A handwritten signature in black ink, appearing to read "Ron Wasserstein", with a long horizontal flourish extending to the right.

Ron Wasserstein
Executive Director