



Comment on the proposed extension of the American Community Survey

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Prepared with the input and guidance of the [ASA Scientific and Public Affairs Advisory Committee](#).

The American Statistical Association (ASA) is pleased to respond to this request for comments on the extension of the American Community Survey from the Department of Commerce ([89 FR 87841](#)).

The American Community Survey has been a vitally important component of the decennial census since replacing the long-form sample in the mid 2000's. The administration's and Congress's rationale for converting the once-in-a-decade long-form data collection to a rolling monthly survey was to substantially improve the timeliness of the data collected without increasing burden to the respondents.

The importance of the ACS to an efficient and effective government, our economy, and our society are evident in myriad ways as evident by the analysis done and broad support expressed leading up to the 2020 decennial census:

- Each year, hundreds of federal spending programs distribute a trillion or more dollars "to states and local areas on the basis, in whole or in part, of data derived from the ACS." In 2017, for example (the year of most recent analysis), 316 federal programs were identified as using ACS data to distribute \$1.5 trillion to states and communities. See Jacobsen, L., Mather, M., and Reamer A. (2022) [America's Essential Data at Risk](#).
- The ACS has strong support from local and state governments, e.g., [this 2017 letter](#) from the leaders of The Council of State Governments, National Association of Counties, National Governors Association, National Conference of State Legislatures, National League of Cities, The U.S. Conference of Mayors, and International City/County Management Association.
- The business community has long supported the ACS. Indeed, the Hamilton Project—a partnership of the Brookings Institution and the American Enterprise Institute—focused the first chapter of their 2017 report, "[In order that they might rest their arguments on](#)

[facts: The vital role of government-collected data](#)”, on the value of ACS data to businesses including a section on how the ACS allows retailers to address the specific needs of local markets. Further, the [business leaders supporting](#) the ACS later included the Council for Community and Economic Research, Insights Association, International Council of Shopping Centers, National Association for Business Economics, National Association of Home Builders, National Association of REALTORS, National Automobile Dealers Association, and National Retail Federation.

The [support of the business community for the ACS and other Census programs](#) was again expressed in August 2024 in reaction to provisions in a House spending bill believed to undermine response rates.

- The [Leadership Conference on Civil and Human Rights](#) has also consistently been a lead champion for the ACS.
- Researchers, planners, and journalists in government, nonprofit organizations, the private sector, and academia attested to the value of the ACS publicly available microdata in an open letter to Census Bureau leadership, July 31, 2019, signed by 4,407 people representing all 50 states and more than 900 colleges and universities. The letter stated that “The ACS is by far the most intensively used data source in the social sciences. To date 54,000 papers have relied on the ACS, including 9,000 papers in the past year alone. These papers span an enormous diversity of research across many disciplines, including topics such as inequality, labor force participation, aging, population health, fertility, family structure, mortality, migration, population distribution, residential segregation, transportation and economic development.... Use of the ACS data are not confined to academic research. The data are widely used by government agencies at all levels and by nongovernmental organizations for policy-relevant research. Over 1,000 journalists have registered to use the IPUMS version of the data, representing organizations such as the New York Times, Washington Post, Boston Globe, Wall Street Journal, and National Public Radio. [Open Letter to Census Bureau Leadership | IPUMS](#)The Census Project elaborates in their 2022 document, [America’s Essential Data at Risk](#), on the importance of the ACS to federal government, business uses, state and local planning, and the US data infrastructure more generally.

The ACS is a “backbone” of other Census surveys, thereby facilitating efficient government data collection more broadly. For this reason, the Interagency Council On Statistical Policy includes the ACS as one of the critical shared resources of the federal statistical system in its [Fiscal Years 2025 & 2026 Strategic Goals and Objectives](#).

In short, the ACS data are likely the country’s most impactful and widely used of any survey. The American Statistical Association therefore strongly endorses the extension of the ACS with sufficient support to sustain its relevance and timeliness, as required by the Evidence Act. We also urge the Commerce Department to fulfill its Evidence Act requirement to “enable, support, and facilitate statistical agencies or units in carrying out the responsibilities described” therein.

We now address the request for information to:

- 1) Evaluate whether the proposed information collection is necessary for the proper functions of the Department, including whether the information will have practical utility;
 - Given the connection of each ACS question to federal need and use, as well as the broad use of ACS in guiding roughly \$1.5 trillion annually in federal programs, continuing the ACS is necessary for the effective and efficient functions of the Department of Commerce and other parts of the federal government. The ACS also has broad benefits to businesses and communities as noted above.
- 2) Evaluate the accuracy of our estimate of the time and cost burden for this proposed collection, including the validity of the methodology and assumptions used;
 - The administering of and reporting from the ACS would not be possible for other levels of government. The federal government uniquely has the expertise, resources, infrastructure, and authority to not only carry out the ACS but also report the data in a way that allows for state to state and community to community comparisons. Attempting to carry out the ACS at the state level would be cost prohibitive to states and communities and result in the loss of the comparative value of the survey. Therefore, if the ACS were not done by the Census Bureau, states and localities would lose a critical information source.
- 3) Evaluate ways to enhance the quality, utility, and clarity of the information to be collected;
 - The ACS is thoroughly tested, with its methodology results made publicly available. The transparency practiced by the Census Bureau for the ACS is consistent with best practice, thereby allowing confidence in the burden estimates and confidence that data users can understand the quality or fitness of the data for different uses.
- 4) Minimize the reporting burden on those who are to respond, including the use of automated collection techniques or other forms of information technology.
 - We urge continued research on minimizing burden of the ACS while maintaining support for the ACS to continue providing relevant, timely, credible, accurate and objective information (in accordance with the Evidence Act). We also note that the current burden to a household asked to respond to the ACS amounts roughly to an average of 40 minutes every 40 years. So we commend the US Census Bureau for achieving a relatively small burden for such an impactful data collection.

Founded in 1839, the American Statistical Association (ASA) is the oldest scientific professional association in the United States. With 15,000 members in academia, industry, and government, ASA's membership and expertise is especially diverse.

Questions on this document can be directed to the ASA Director of Science Policy Steve Pierson, pierson@amstat.org.