



AMERICAN STATISTICAL ASSOCIATION

Promoting the Practice and Profession of Statistics®

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October 21, 2025

The Honorable Jerry Moran
Chair, Senate Committee on Commerce,
Justice, Science, and Related Agencies
Washington, DC 20510

The Honorable Hal Rogers
Chair, House Committee on Commerce,
Justice, Science, and Related Agencies
Washington, DC 20515

The Honorable Chris Van Hollen
Ranking Member, Senate Committee on
Commerce, Justice, Science, and
Related Agencies
Washington, DC 20510

The Honorable Grace Meng
Ranking Member, House Committee on
Commerce, Justice, Science, and
Related Agencies
Washington, DC 20515

Dear Chair Moran, Chair Rogers, Ranking Member Van Hollen, and Ranking Member Meng,

As the executive director of the American Statistical Association, I write to express our deep concern about the provision in the House FY26 Commerce, Justice, Science appropriations bill (Section 605) that would prohibit the Census Bureau from making more than two contact attempts for any survey. While this directive might appear to reduce costs, it would, in practice, undermine the nation's statistical infrastructure, distort representation, and erode the precision of the data on which communities, businesses, and governments depend. I urge that it not be adopted in the final FY26 CJS appropriations bill.

The experience of the American Community Survey is clear: after just two mailings, the Census Bureau reaches only about 20 percent of households.¹ That level of participation is far too low to sustain accurate and reliable national statistics. Without additional follow-up, estimates lose precision and margins of error expand, especially for state-level and community-level estimates. Smaller states, towns, rural counties, and minority communities risk vanishing from the statistical record. Imprecise data translates for those geographies and communities into lost federal dollars, weakened infrastructure planning, and misdirected policies.

¹ National Academies of Sciences, Engineering, and Medicine. (2019). Improving the American Community Survey: Proceedings of a Workshop. Washington, DC: The National Academies Press. <https://doi.org/10.17226/25387>.

Nonresponse is not random. Hard-to-reach households such as rural families, renters, and low-income households are disproportionately excluded when follow-up is limited. Experience has shown that collecting efforts must continue beyond two attempts to reach them. Further, research shows these respondents most closely resemble the nonrespondents, and their inclusion is critical to reducing bias.² Excluding them systematically biases results toward more affluent and easier-to-count groups. We saw these biases manifest in 2020, when pandemic disruptions forced the ACS to scale back field operations. The result was a data set skewed toward higher-income households such that the bureau had to classify it as “experimental.”³

The consequences of restricting follow-up extend across government. The Census Bureau conducts more than 120 surveys, many for other federal agencies. The Current Population Survey provides the nation’s official measures of jobs and unemployment. The National Crime Victimization Survey informs public safety policy. The Consumer Expenditure Survey tracks household spending patterns that shape inflation measures and economic policy. Housing surveys guide Housing and Urban Development programs, and the National Health Interview Survey provides critical data on health status, access to care, and health disparities. Limiting these surveys to two contacts would choke off the data pipelines that sustain nearly every federal program.

The monetary costs of additional follow-up are real, but the benefits are greater. A Bureau of Labor Statistics study found that while extreme follow-up yields diminishing returns, early and mid-level efforts are critical to reducing bias.⁴ Other research confirms that the hardest-to-reach respondents are the most important for reducing systematic error.² A National Academies panel on nonresponse emphasized that limiting contact attempts threatens data quality for key federal surveys and called for innovation in follow-up strategies, rather than restriction.⁵ Recent studies linking survey records with administrative data show that when response rates fall, income and poverty estimates are biased upward, with Hispanic and low-income households particularly undercounted.⁶

² Peytchev, A., Baxter, R. K., & Carley-Baxter, L. R. (2009). Not All Survey Effort Is Equal: Reduction of Nonresponse Bias and Nonresponse Error. *The Public Opinion Quarterly*, 73(4), 785–806. <http://www.jstor.org/stable/40467642>.

³ Census Bureau (2021). An Overview of Addressing Nonresponse Bias in the American Community Survey During the COVID-19 Pandemic Using Administrative Data. <https://www.census.gov/newsroom/blogs/random-samplings/2021/11/nonresponse-acscovid-administrative-data.html>.

⁴ Safir, A. & Tan, L. (2009). Using Contact Attempt History Data to Determine the Optimal Number of Contact Attempts. Bureau of Labor Statistics. <https://www.bls.gov/osmr/research-papers/2009/st090200.htm>.

⁵ National Research Council (2013). *Nonresponse in Social Science Surveys: A Research Agenda*. Washington, DC: The National Academies Press. <https://doi.org/10.17226/18293>.

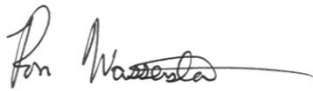
⁶ Bee, A. & Rothbaum, J. (2025). Using Administrative Data to Evaluate Nonresponse Bias in the 2025 Current Population Survey Annual Social and Economic Supplement. Census Bureau.

Other nations invest in robust statistical systems to ensure representativeness. The US has historically led in this area, but declining response rates in federal surveys already demand more effort and innovation, not less.^{7, 8} The Census Bureau is experimenting with adaptive designs and alternative data sources, such as prioritizing hard-to-reach cases using administrative data, to save costs while preserving quality.⁹ While repeated outreach can sometimes feel burdensome, Office of Management and Budget standards already require agencies to balance data quality with respondent burden.¹⁰ Imposing a rigid two-contact limit would foreclose such innovation, locking in bias rather than managing it. Similar research to use alternative sources and improve survey cost-effectiveness are taking place internationally.¹¹

As executive director of the ASA, with the support of our Section on Survey Research Methods and their expert rationale provided in this letter, I urge that this provision not be enacted in the final FY26 appropriations agreement. Well-designed, scientifically based precise data are indispensable to good governance, fair representation, and American competitiveness. Restricting the Census Bureau to two contacts undermines American data infrastructure. Limiting the Census Bureau's ability to follow up with households would weaken the very foundation of informed decision-making.

Thank you for your consideration.

Sincerely,



Ron Wasserstein, PhD
Executive Director

<https://www.census.gov/newsroom/blogs/research-matters/2025/09/administrative-data-nonresponse-bias-cps-asec.html>.

⁷ Brick, J. M., & Williams, D. (2012). Explaining Rising Nonresponse Rates in Cross-Sectional Surveys. The ANNALS of the American Academy of Political and Social Science, 645(1), 36-59. <https://doi.org/10.1177/0002716212456834> (Original work published 2013).

⁸ Williams, D. & Brick, J.M. (2018). Trends in U.S. Face-To-Face Household Survey Nonresponse and Level of Effort, Journal of Survey Statistics and Methodology , Volume 6, Issue 2, Pages 186–211, <https://doi.org/10.1093/jssam/smx019>.

⁹ Census Bureau (2025). Understanding the 2024 American Community Survey 1-Year Estimates. <https://www.census.gov/newsroom/blogs/random-samplings/2025/09/acs-1-year-estimates.html>.

¹⁰ U.S. Office of Management and Budget. (2006). Standards and Guidelines for Statistical Surveys. Washington, DC. https://nces.ed.gov/fcsm/pdf/OMB_Standards_Guidelines_Statistical_Surveys.pdf.

¹¹ UNECE (2025). Work plan of the High-Level Group for the Modernisation of Official Statistics for 2025. Economic Commission for Europe, Conference of European Statisticians. ECE/CES/2025/18. <https://unece.org/statistics/documents/2025/05/working-documents/work-plan-high-level-group-modernisation-official>.