



October 2, 2015

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

RE: Proposed Information Collection: Comment Request: 2016 Census Test
Federal Register Vol. 80, No. 149/August 4, 2015, pp. 46239-46242

Dear Ms. Jessup,

On behalf of the Population Association of America's (PAA) Committee on Population Statistics (COPS) and Association of Population Centers (APC), we are pleased to respond to the notice in the August 4, 2015 *Federal Register* requesting comments regarding the proposed 2016 Census Test.

PAA and APC believe that the successful conduct of the 2020 Census is vitally important to the health and well-being of America's communities, large and small. For the next decade, apportionment of seats in the House of Representatives, legislative redistricting, the geographic flow of federal funds, and informed decision-making at all levels of government, in the not-for-profit sector and in business rely -- directly or indirectly-- on the results of the 2020 Census. The PAA and APC continue to support the Census Bureau's efforts to adopt new and innovative approaches aimed at conducting a more cost-efficient census in 2020 that maintains data quality. The fact that the Census Bureau is continuing to test these new approaches and validate existing ones is encouraging, especially in the areas of optimizing self-response and in the development of alternate approaches to the costly and frequently inefficient follow-up that characterizes the final stages of the census enumeration.

Optimizing Self-Response

The PAA and APC agree that the ideal way to make the census more cost-effective is to increase the level of self-response. Encouraging respondents to answer the census questionnaire via the Internet and the refinement of materials in languages other than English can prove to be very useful in this endeavor. The real-time flexibility offered by questionnaires administered via the Internet is especially promising, potentially increasing the quality of data that are collected. The PAA and APC strongly endorse efforts to clarify the number of persons residing in households by probing with additional questions; however, it is important to re-emphasize a comment made in our earlier response to the Federal Register Notice on the 2015 National Content Test. In that response, the PAA and APC applauded the merits of the Bureau's efforts to clarify the application of residence rules in the actual data collection operation. Regarding the inclusion of probing questions:

*“This is akin to recommendations made by the National Research Council Panel on Residence Rules in the Decennial Census. In their report, *Once, Only Once and in the Right Place*, the Panel recommended reducing the burden on respondents by gathering information through a series of guided questions, as opposed to having residence determined solely by instructions to the respondent, which are frequently not read (National Research Council, 2006). The current testing moves in this direction and seeks empirical evidence of viability within existing census operations. One potential problem is that the new approach in the 2015 test relies on an extensive series of guided questions that are interactive in nature and, as such, are consistent with computer-assisted methods of data collection, and not with data collection using paper forms. Thus, this advance may heighten differences by mode of data collection in new ways, an issue that needs to be addressed before methods are formally adopted for 2020.”*

The increasing complexity of living arrangements have made application of the census residence rules increasingly difficult, which these methods are intended to address. The PAA and APC support the Bureau’s efforts to better specify the questions to be used as part of the Internet residence rules probe and its efforts to determine which method works best using a coverage reinterview in this test. At the same time, however, as with earlier testing, the Bureau needs to be mindful about the biases that are likely to appear by response mode, since the opportunities for probing among those who respond via the Internet will likely differ from those who use paper questionnaires.

Refinement of Existing and Proposed Questions

The PAA and APC support the Bureau’s continuing efforts to test modified versions of questions on race and ethnicity and household/family relationship, including the identification of same-sex married couples. The flexibility afforded by computer-based modes of data collection can provide distinct advantages in the reporting of different races/ethnicities and household/family relationships; but, again, the Bureau needs to be cognizant of the limitations posed by paper questionnaire responses. While mention is made about expanding future testing by evaluating the effectiveness of paper questionnaires in incorporating new terminology, the PAA and APC would like to recommend that the Census Bureau include this evaluative component in the 2016 Census Test itself. Given the timing of major census decisions, it would be prudent for the Bureau to incorporate this information as part of major operational decisions.

Administrative Records

Given the expensive, time-consuming, and problematic nature of current methods used to follow-up on households that fail to respond to the census, the PAA and APC support the Bureau’s efforts to develop cost-effective and creative strategies to achieve a complete count. Indeed the PAA and APC would like to reiterate an earlier statement made in response to the 2014 Federal Register Notice about the 2015 census tests:

“Given the track record of earlier experiences in non-response follow-up with costly, labor intensive and frequently low quality ‘last resort’ enumeration strategies, PAA and APC welcome the testing of techniques that may prove to be a more efficient means of data collection.”

At the same time, however, earlier concerns about the challenges affecting the uses and coverage of administrative records warrants a cautious approach involving multiple tests in areas with a wide variety of circumstances. Thus, the PAA and APC were pleased to see the selection of Los Angeles, CA and Harris County, TX as sites for the 2016 testing, since parts of both places provide substantial challenges in execution of the census. This includes address list issues, especially involving the identification and labeling of non-traditional structures; difficulties in the determination of occupancy status; fear of governmental authority associated with legal status; and barriers posed by language/literacy issues and high levels of poverty. Moreover, all of the issues raised in the earlier submission by the PAA and APC concerning the efficacy of administrative records -- differences in reference points, presence of tax returns for poorer households, effectiveness of using information on records to “complete” questionnaires – are still germane for the 2016 Test.

The PAA and APC recognize that a one-size-fits-all solution is not going to occur on the administrative records front, so it is encouraging to see that the Bureau is considering combinations of records for more complete coverage of the population, within an adaptive design framework (Mule, 2014). The evaluation of what scenarios work best in the census test is prudent, along with supplemental mailings to housing units that were removed from non-response follow-up operations, to better determine whether the disposition of the household from administrative records was indeed correct. Along these lines, strong consideration should be given to the findings of the *Administrative Records and Third Party Data Use in the Census Working Group* of the Census Bureau’s National Advisory Committee (National Advisory Committee, 2014). Their list of recommendations provides a good framework for analyzing the effectiveness of administrative records, especially when it comes to the potential biases related to their use in non-response follow-up.

In summary, the PAA and APC strongly support the efforts by the Census Bureau to test new methods that would make the 2020 Census more cost-efficient and accurate. Such testing is essential to the successful conduct of the 2020 Census, since new methods must be adequately field-tested before they can be formally adopted. At the same time, however, it is important to recognize that no test can fully ensure the success of changes in census data collection procedures, especially those involving new methods. Therefore, in order to maximize the odds of success, the PAA and APC strongly encourage the Census Bureau to seek out experts in organizations that represent the stakeholder community, to review census test results as part of their reality-check of methods before final decisions are made.

Best regards,



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President, PAA



Lisa Berkman
President, APC