



January 28, 2015

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

Sent via email: jjessup@doc.gov

RE: Proposed Information Collection: Comment Request: 2015 National Content Test
Federal Register Doc. 2014-28247.

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 December 2, 2014 *Federal Register* requesting comments regarding the 2015 National Content 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 allocation of federal funds, and informed decision-making at all levels of government and in business rely -- directly or indirectly-- on the results of the 2020 Census.

The following comments are divided into two sections: 1) those that concern efforts to test a variety of contact strategies for optimizing self-response, better ensuring the coverage of persons in households, and providing language support for census respondents; and 2) those that concern the testing of content related to relationship as it concerns married-couples and unmarried partners, and questions related to race/ethnicity.

Contact Strategies

The PAA and APC support the Census Bureau's efforts to increase self-response and provide language support as part of its strategy to improve census accuracy and contain costs. The logistics of delivering questionnaires, the timing of reminders, and their mode of delivery (postcard, letter, email) are understandably complex and require empirical validation before they are employed. Of special interest is the supplemental contact frame, where email addresses will be tested as a potential supplement or replacement for postcard reminders.

The PAA and APC think that it is useful for the Bureau to think creatively about how best to

address the problem of counting everyone in a household that should be counted, and reduce the incidence of erroneously reporting persons who have a “usual home elsewhere” (e.g. college students in dorms). Comparing the current “rules-based” approach, where the Census Bureau provides a set of definitions (aka “rules”) on who should be included on the census form with a more “open” approach, where a series of questions help the respondent (and the Bureau) determine who should be listed on the household roster, could prove to be very useful. 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.

Finally, the PAA and APC endorse the testing options for providing language assistance because these tests will help shed light on the best strategies for optimizing response from those respondents who are not proficient in English. Eliciting compliance to the census has become more problematic in many areas of the nation, as immigrants with limited English proficiency settle well beyond the historical immigrant-receiving states. The best course of action, however, may require a considerable number of tailored approaches, based on the groups represented and their geographic locations. The test should provide the Census Bureau with data that can inform decision-making along these lines.

Content - Relationship and Race/Ethnicity

The PAA and APC believe that testing a new relationship question that integrates gender with relationship for married-couples and unmarried partners is a good idea whose time has come. Previous research on the 2010 Census showed that the identification of same-sex married couples using a two question approach (i.e. sex and relationship to householder) was seriously compromised by errors in the reporting of sex (O’Connell and Feliz, 2011). The PAA and APC believe that the testing of a combined sex-relationship question, with specific categories for same-sex married couples and unmarried partners has great potential to reduce these errors. Especially important are the diagnostic checks being performed for consistency between the separate identification of respondents as being male or female and their responses in the combined sex-relationship question. Conducting follow-up on inconsistent responses can prove to be very valuable in the ultimate determination about the efficacy of the combined question.

The PAA and APC applaud the Bureau’s efforts to provide respondents with a greater opportunity to report their detailed race and ethnicity. This step will make the census more

inclusive and relevant in an era where the nation is becoming increasingly diverse as a result of immigration from many different countries. The PAA and APC believe that the decennial census should test options that provide information for race and ethnic categories that are not only mandated by the Federal Office of Management and Budget, but are essential for the conduct of policy research, program planning and implementation, and the social science research that undergirds our understanding of differences by race, ethnicity and origin.

For decades, data users have been provided with numbers for detailed Asian and Hispanic subgroups from the decennial census short form, but no detail on subgroups that may be included under white and black race categories. Around census time, local census partners have often been in a difficult position to explain why someone who is Chinese gets to list themselves in detailed fashion, while those who are Jamaican or Irish do not. This has become an especially important issue starting in 2010, with the decoupling of the long form from the decennial census. Some groups (e.g. Black West Indians) feel overlooked as a result of their seeming inability to report their detailed race/ethnicity within the existing race/Hispanic categories. The spirit of inclusiveness that is actively promoted by the Census Bureau around the decennial census could be compromised in some communities because of this issue.

After reviewing the results of the 2010 Alternate Questionnaire Experiment (AQE), the PAA and APC believe that the one-question option likely holds the most promise regarding the collection of more detailed information on racial/ethnic origins. Increased reporting detail and lower item non-response are among the results that provide at least tentative support for the single question approach (Compton et al., 2013). Moreover, the results of cognitive testing and focus group research have shown that the one-question approach is perceived as more equitable. Still, given the importance of race/ethnicity as part of the decennial census, the PAA and APC fully support the Census Bureau's efforts to provide more definitive evidence regarding the viability of the measurement alternatives, in the form of this large and comprehensive test.

The PAA and APC acknowledge that including write-in options under the existing five categories may be insufficient for the purposes of providing more sub-group data, since respondents from the Middle East or North Africa may not associate themselves with any of these existing categories. Therefore, the PAA and APC believe that there is a real need to test the efficacy of a separate Middle Eastern or North African (MENA) category.

In an effort to be more inclusive, the PAA and APC applaud the Census Bureau's efforts to gather data on the efficacy of the terms "race," "ethnicity" and "origins." However, this needs to be done, not only as it relates to instructional materials, but potentially as part of the actual question wording. In the context of the Bureau's efforts to be more inclusive, it should consider the possibility that the extensive use of the word "origins" in instructional materials may portend its usefulness in the actual question wording.

Finally, the use of different modes for data collection holds much promise for eliciting high levels of response while containing costs. As the Census Bureau is well aware from previous experience, even seemingly small changes in question wording or in the logistics of data collection can have important impacts on how individuals respond. In the area of race and ethnic

data collection this is especially true, as evidenced by the big impact of a seemingly small change in the examples provided as part of the write-in portion of the Hispanic question in 2000. Therefore, the PAA and APC would like to underscore the importance of evaluating test results for race and ethnicity by mode of data collection in the test. This should promote a better understanding of differences between Internet-based self-response (with prompting for subgroups), versus response via other methods of collection, especially those involving paper questionnaires.

Thank you for this opportunity to comment on the 2015 National Content Test.

Sincerely,



Steven Ruggles, Ph.D.
2015 President
Population Association of America



Lisa Berkman, Ph.D.
2014-2016 President
Association of Population Centers

REFERENCES

Compton, Elizabeth, M. Bentley, S. Ennis, S. Rastogi (2013). *2010 Census Race and Hispanic Origin Alternative Questionnaire Experiment: Final Report*. 2010 Census Planning Memoranda Series, No. 211 (2nd Reissue). Washington DC: U.S. Census Bureau.

National Research Council (2006). *Once, Only Once, and in the Right Place: Residence Rules in the Decennial Census*. Panel on Residence Rules in the Decennial Census. Daniel L. Cork and Paul R. Voss, eds. Committee on National Statistics, Division of Behavioral and Social Sciences and Education. Washington, DC: The National Academies Press.

O'Connell, Martin and S. Feliz (2011). "Same-sex Couple Household Statistics from the 2010 Census." U.S. Census Bureau, SEHSD Working Paper Number 2011-26.