



UNITED STATES DEPARTMENT OF COMMERCE
Economics and Statistics Administration
U.S. Census Bureau
Washington, DC 20233-0001
OFFICE OF THE DIRECTOR

April 15, 2009

MEMORANDUM FOR Ruth Ann Killion
Chief, Demographic Statistical Methods Division

Cheryl R. Landman
Chief, Demographic Surveys Division

From: Howard Hogan *Howard Hogan*
Associate Director for Demographic Programs

Subject: Revised Policy on Using the American Community Survey (ACS)
as a Frame for Reimbursable Follow-on Surveys

In consultation with the Office of Management and Budget, the Demographic Program Associate Director has revised the Policy on using the American Community Survey (ACS) to clarify the process and establish criteria to ensure limited use of the ACS. The revised policy also clarifies that any follow-on survey will abide by the rules of the paperwork reduction act and will be collected under Title 13 authority since the ACS is conducted under this authority.

The following clarification was added to the original policy and criteria. The OMB and Census will take into consideration the need to retain sample for future usage. Therefore, the requested strata definitions or level of sampling detail may be adjusted to meet competing demands for the ACS sample. In general, the constraints for one-time surveys will be less restrictive than for re-occurring surveys. Census will make every effort to best balance the needs of these competing demands and will minimize these constraints as much as possible. Once it is determined that future usage for a sample will no longer be needed, the sample held back can be available to the requester's.

Any questions about this policy, should be directed to Dr. Howard Hogan, Associate Director for Demographic Programs. He can be reached on x32061.

Attachment

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POLICY ON USING THE AMERICAN COMMUNITY SURVEY AS A FRAME FOR REIMBURSABLE FOLLOW-ON SURVEYS

PURPOSE

The purpose of this policy is to state the U.S. Census Bureau's criteria for determining appropriate uses of the American Community Survey (ACS) as a frame for new reimbursable follow-on surveys.

LEGAL AUTHORITIES

Title 13, United States Code (U.S.C.), Section 182, authorizes the Census Bureau to collect "annual and other interim current data on the subjects covered by the censuses provided for in [Title 13]." Furthermore, Section 196 "authorizes the use of..."sampling" in carrying out the provisions of [Title 13]."

The chief legal authorities governing reimbursable surveys are Title 13 U.S.C., Section 8(b), and Title 15, U.S.C., Sections 1525 and 1526. Reimbursable surveys must be conducted under one authority or the other. Surveys conducted under Title 15, U.S.C., must have an identified legal authority from the sponsor's statute. The ACS is collected under Title 13 authority and therefore any follow-on surveys will be collected using that authority and will abide by the rules of the paperwork reduction act.

After a data collection project is approved under this policy, the sponsoring agency must submit a request for clearance to the Office of Management and Budget (OMB), as required by the Paperwork Reduction Act, and the request should be routed to the Census Bureau Desk Officer for concurrence. No collections of data from the public can be done without OMB approval and appropriate citations on all forms associated with the collection.

SCOPE

This policy covers all requests from outside the Census Bureau to use the ACS as a sampling frame for new reimbursable follow-on surveys.

BACKGROUND

The ACS terms of clearance, as set by OMB, requires an approach to provide limited use of the ACS frame for new follow-on surveys. This policy is needed to clarify the process and establish criteria for such use of the ACS. Clearly, high quality statistics can be provided at reduced cost by taking advantage of the ACS and decennial census frames. The ACS is a cost-effective sampling frame for other surveys but its use must be carefully managed and held to consistent standards.

A sampling frame provides a listing of persons, housing units, businesses, records, land segments, etc. A sampling frame may be used to cover the entire sampled population. There are many sources of sampling frames such as the Master Address File, a permanent list of addresses for individual living quarters nationwide; administrative records, data collected for the purpose of carrying out various programs; and list frames, collections of sampling units that have been numbered or otherwise identified.

The ACS is a cost effective sampling frame for follow-on surveys when the target population consists of a rare population or a combination of characteristics, rather than a particular geographic area which can be obtained from the Master Address File (MAF) or other sources.

POLICY

In order for the Census Bureau to respond uniformly to requests to use the ACS as a frame for follow-on surveys, criteria for determining appropriate uses are needed. The established criteria must be consistent with the Census Bureau's mission to serve as the leading source of quality data about the Nation's people and economy, while also supporting our commitment to respect the public's privacy. In responding to such requests, the Census Bureau must consider both respondent burden and appropriate informed consent.

A request for a new survey to use the ACS as the sampling frame is subject to the Census Bureau's Reimbursable Policy and its checklist. Assuming the request meets the criteria for acceptance, even if funding is not necessarily a given, the next step is referral of the request to the Associate Director for Demographic Programs.

In consultation with OMB, and with other associate directors as appropriate, the Associate Director for Demographic Programs will consider the merits of the proposed data collection and make a determination based upon the following criteria:

1. The ACS respondent must be informed of the possibility of inclusion in follow-on surveys.
2. Priority will be given to requests for surveys currently conducted by the Census Bureau that could substantially reduce costs if the ACS frame is used for sample selection.
3. A major objective of the survey must be to produce estimates for populations that would otherwise have prohibitively expensive screening costs.
 - 3a. Consideration will be given to surveys that seek to produce estimates of 'rare' populations or populations that are **small subsets of the universe population and that are not geographically concentrated**. Generally, rare populations should be less than 5% of the "universe". For example, these could include households with income less than \$5,000 or households with urban American Indians.
 - 3b. In addition, surveys that collect information from a **universe 'sensitive' or 'difficult to reach' populations** will also be considered. For example, these could include young children, persons with serious health conditions, limited English-speaking or culturally-isolated people. [Note: The Census Bureau considers residents of shelters for battered or abused women and children uniquely sensitive and does not permit inclusion of them in any reimbursable data collection.]
 - 3c. Consideration would be given to critical data and timing needs in situations of national disaster. For example, collecting data quickly from a devastated national disaster area, such as the Gulf Coast following Hurricane Katrina, could be considered an appropriate use of the ACS frame.

In addition to the criteria above, the OMB and Census will take into consideration the need to retain sample for future usage. Therefore the requested strata definitions or level of sampling detail may be adjusted to meet competing demands for the ACS sample. In general, the constraints for a one-time survey will be less restrictive than for re-occurring surveys. Census will make every effort to best balance the needs of these competing demands and will minimize these constraints as much as possible.

The American Community Survey Office (ACSO) staff will provide access to the appropriate files and assistance to the Demographic Statistical Methods Division (DSMD) in making appropriate sample selections. DSMD will keep ACSO apprised of actual sample selections. In order to avoid follow-up of ACS households too soon after their ACS interview, only the prior year's ACS sample will be made available for follow-on surveys in any given year. The ACS is collected under Title 13 authority and therefore any follow-on surveys will be collected using that authority, will submit clearance to OMB, and will abide by the rules of the paperwork reduction act.