



UNITED STATES DEPARTMENT OF COMMERCE
Bureau of the Census
Washington, DC 20233-0001

OFFICE OF THE DIRECTOR

June 7, 2013

Ms. Katherine K. Wallman
Chief Statistician
Office of Management and Budget
Office of Information and Regulatory Affairs
Washington, DC 20503

Dear Katherine:

Following our recent conversations, I am writing to request a deletion from the request for forms clearance involving the American Community Survey (ACS). This concerns the proposed addition of a question on "Health insurance premiums and subsidies" to ACS, and the proposed removal of the "Number of times married" question from the ACS.

Recent concerns challenges about the intrusiveness of several Census Bureau programs, including the American Community Survey, proposed legislation that would make ACS response "optional," and the Duncan bill, that would repeal the Census Bureau's authority to conduct most surveys and censuses, raise significant concerns about making changes to the ACS during a period of great uncertainty.

This challenging environment, combined with significant FY13 ACS budget cuts, forced the Census Bureau to revisit the technical merits of the proposed new health insurance question and the implications of introducing the new question in 2014. The process for including these questions in the ACS was accelerated due to upcoming changes in the provision of health care. As a result, there was limited testing of the new question, and we have yet to analyze the results of adding the revised questions to the CPS-ASEC, which limits our ability to completely assess the impact of asking these new questions on 3.5 million sampled households. Moreover, uncertainty about how respondents will interpret and answer the questions, plus the likelihood that the question may change once health care reform is implemented in 2014, argue against making any content changes to the health insurance question at this time.

With regards to the removal of the "Number of times married" question, the Census Bureau did not adequately inform the data user community of our proposal to drop this question from the 2014 ACS. Consequently, we have received a number of complaints including one from the Census Bureau's Scientific Advisory Committee. The comments have pointed out that the ACS is now the primary source of annual statistics on the characteristics of people who marry or divorce during the year after NCHS terminated the collection of this information in 1995. While the ACS Subcommittee has developed criteria to use in determining what, if any, questions should be dropped from the ACS, the Census Bureau has not evaluated this question against the criteria. Moreover, the Census Bureau has just begun a comprehensive review of all the questions on the ACS including a review of the program justification, the legal requirements, the importance of the question, the uniqueness of the information, and the need for providing this

information for Census tracts and block groups. Users of the marital history question will be asked to respond to these questions.

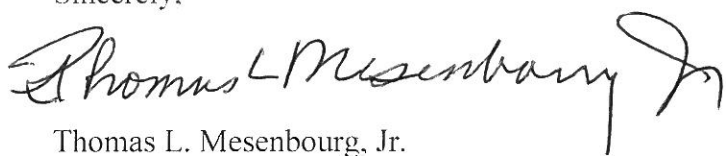
The Interagency Council on Statistical Policy Sub-committee on the ACS met on May 22, 2013 to discuss the proposed changes to the 2014 ACS. The Subcommittee supported the recommendations described above.

For these reasons, I ask that you omit the proposed addition of a question on "Health insurance premiums and subsidies" to ACS, and the proposed removal of the "Number of times married" question from the ACS in the clearance package your office has received.

The clearance package contains supporting statements in multiple sections that reference the previously proposed changes to these items. These include part A.1 (Necessity of the Information Collection, Changes in ACS Content for 2014) part A.8 (Consultations Outside the Agency), part B.4 (Testing Procedures). In addition, Attachment V provided additional justification for adding the "Health insurance premiums and subsidies" question. Finally, the sample questionnaires provided as attachments for all of the data collection modes (attachments C, E, H, I, L, M, R, S, and T) currently include this question, and exclude the "Number of times married." Please ignore the reference to the "Health insurance premiums and subsidies" questions when reviewing those sections of the clearance package. We will include the "Number of times married" question as currently presented in our 2013 questionnaires.

I would be happy to discuss this with you at any time. Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in black ink, reading "Thomas L. Mesenbourg, Jr." with a stylized flourish at the end.

Thomas L. Mesenbourg, Jr.
Acting Director