



COSSA

Consortium of Social Science Associations

AMERICAN
ANTHROPOLOGICAL
ASSOCIATION

December 9, 2014

AMERICAN ASSOCIATION
FOR PUBLIC OPINION RESEARCH

Ms. Jennifer Jessup
Departmental Paperwork Clearance Officer
U.S. Department of Commerce
14th and Constitution Avenue NW

AMERICAN ECONOMIC
ASSOCIATION

AMERICAN EDUCATIONAL
RESEARCH ASSOCIATION

Room 6616
Washington, DC 20230

AMERICAN HISTORICAL
ASSOCIATION

Re: FR Doc. 2014-25912

AMERICAN POLITICAL
SCIENCE ASSOCIATION

Dear Ms. Jessup:

AMERICAN
PSYCHOLOGICAL
ASSOCIATION

I am writing in response to the Federal Register Notice dated October 31, 2014 requesting public comment on the American Community Survey (ACS) Content Review. Thank you for the opportunity to express the following views on behalf of the Consortium of Social Science Associations (COSSA). I will focus my comments on Person Questions No. 12 and 21a-23.

AMERICAN SOCIETY
OF CRIMINOLOGY

AMERICAN SOCIOLOGICAL
ASSOCIATION

Social and behavioral science researchers from throughout the COSSA community object to the proposed removal of **Person Question No. 12—Undergraduate Field of Degree** from the ACS and urge the Census Bureau to reconsider this decision before finalizing the content of the 2016 survey. It is our hope that this question was slated for removal in error as there are several documented uses and benefits of Person Question No. 12, as noted below.

AMERICAN STATISTICAL
ASSOCIATION

ASSOCIATION OF
AMERICAN GEOGRAPHERS

ASSOCIATION OF
AMERICAN LAW SCHOOLS

LAW AND SOCIETY ASSOCIATION

LINGUISTIC SOCIETY
OF AMERICA

MIDWEST POLITICAL SCIENCE
ASSOCIATION

First, Person Question No. 12 serves as the sample frame for the National Survey of College Graduates (NSCG), which is administered by the National Science Foundation's National Center for Science and Engineering Statistics (NCSES), a sister federal statistical agency. The NSCG produces comprehensive information on the state of the U.S. science and engineering workforce, which helps policy makers, educators, employers, and the public understand dimensions of this group, including educational paths, publications and patents, compensation, sectors of employment, and demographics. No other source currently exists to replace the data should Person Question No. 12 be removed from the ACS in 2016.

NATIONAL
COMMUNICATION
ASSOCIATION

POPULATION ASSOCIATION OF
AMERICA

Second, through the NSCG and data collected from Person Question No. 12, NSF is able to respond to its Congressional mandate (P.L. 96-516) to collect and report statistics on women, minority, and persons with disabilities' participation in STEM fields. Reproducing data on U.S. undergraduate degrees would add significant costs to meeting this mandate, costs arguably in excess of any savings achieved by eliminating Person Question No. 12 from the ACS.

SOCIETY FOR RESEARCH
IN CHILD DEVELOPMENT

WENDY A. NAUS
EXECUTIVE DIRECTOR

JAMES S. JACKSON, PH.D.
PRESIDENT



In addition to NSF's use of data acquired through Person Question No. 12, countless non-governmental organizations, including states and localities, rely on these data for activities from economic development and attracting certain industries to a city or region to studies analyzing the earning potential for different undergraduate degrees. For example, social scientists rely on the data for research that assess the U.S. science and technology workforce and the American Academy of Arts and Sciences in particular uses the data in the production of its *Humanities Indicators* project, which analyzes earnings and occupations of humanities majors.

I refer you to the public comment submitted by the Council of Professional Associations on Federal Statistics (COPAFS) on November 25, 2014 for additional details on the benefits of Person Question No. 12 within the context of the review methodology used in this case by the Census Bureau.

Finally, the social and behavioral science community is also concerned with the proposed elimination of **Person Questions No. 21a-23 relating to marital history**. These questions provide the only source of data for examining trends in marriage and divorce transitions by socioeconomic status and by population subgroups, which can have implications for administering and assessing government programs. For many social and behavioral science researchers, loss of these data would mean a compromised ability to track and interpret long-term marriage trends and analyze how changes in marriage trends impact the health and well-being of individuals across the lifespan.

On behalf of the social and behavioral science community, I urge the Census Bureau to reassess the classification of these questions as "Low Benefit" and retain them in the 2016 ACS.

Thank you for the opportunity to express these views. Please do not hesitate to contact me with any questions or if you require additional information.

Sincerely,

Wendy A. Naus
Executive Director
Consortium of Social Science Associations