

Charter of the Interagency Council on Statistical Policy Subcommittee on the American Community Survey

1. Background

The American Community Survey (ACS) is unique among U.S. household surveys because of its size (about 3.5 million sample housing unit addresses per year), its breadth of measurement (demographic, economic, social, and housing estimates), the provision of temporal period estimates (1- and 5-year estimates) describing small spatial areas, and as a data source for numerous Federal statistical agencies and other executive branch agencies. For these reasons, it is a national resource for which the Federal statistical system is a steward.

As the successor to the decennial census long form, response to the ACS is required by law. For that reason, it attains very high participation rates relative to other Federal government surveys. For users concerned about statistical bias due to nonparticipation, the ACS estimates are attractive. Also, like the decennial census, it provides comparable statistics for all areas (states, locales, tracts, block groups) and all population groups (even small and rare ones) collected over the same period of time and using the same questions and survey methods.

Because of the roles the ACS plays in the larger society, it is appropriate that the uses of the ACS be reviewed by representatives of the larger Federal statistical system.

2. The Interagency Council on Statistical Policy Subcommittee on the ACS (ICSP-SACS)

The Office of Management and Budget (OMB) and the Census Bureau co-chair the Subcommittee of the Interagency Council on Statistical Policy (ICSP). The ICSP Subcommittee on the ACS will exist to advise the Chief Statistician of the United States at OMB and the Director of the Census Bureau.

This document details the mission, composition, and operations of the Interagency Council on Statistical Policy (ICSP) Subcommittee on the ACS (SACS).

3. Mission

The mission of the ICSP-SACS is to advise the Chief Statistician and Census Bureau Director consistent with key governing policies and practices for the ACS from the perspective of the Federal statistical system. The subcommittee members will provide advice to the Director of the Census Bureau and the Chief Statistician at OMB on how the ACS can best fulfill its role in the portfolio of federal household surveys and provide the most useful information with the least amount of burden. Subcommittee members may also advise Census Bureau technical staff on issues they request the subcommittee to examine or that otherwise arise in discussions.

4. Composition

Subcommittee members will be invited from among ICSP members who have broad knowledge and experience with the Federal statistical system and socio-economic statistics from the ACS more specifically. The committee will consist of five persons:

- The Chief Statistician of the United States of OMB (ex officio)
- The Director of the Census Bureau (ex officio)
- Three members of the ICSP, designated by the Chief Statistician, each serving a three-year, renewable term.

The two *ex officio* members will co-chair the committee. The committee will be jointly staffed by staff of the Statistical and Science Policy Office of OMB and the American Community Survey program at the Census Bureau.

If any matter comes before the subcommittee involving an agency of a member (other than OMB and the Census Bureau), that member would recuse himself/herself from the deliberation.

5. Operations of the Committee

There will be both annual and *ad hoc* activities of the committee. The Census Bureau will conduct periodic reviews of the survey questions to consider any deletion or addition of questions. The subcommittee should consider respondent burden when entertaining the addition of questions. Ad hoc meetings may be held to consider any proposal for follow-on surveys on ACS responding households or modules asked of subsamples of ACS.

Proposals may be presented to the subcommittee for question addition, question revision, question deletion, follow-on surveys, or including a module of questions asked for a subsample of ACS cases. These proposals will normally occur after informal discussions between the proposers and the OMB Statistical and Science Policy Office staff but precede any testing of measurements to be added to the ACS. The proposals must address the decision criteria described in section 6.1. The subcommittee will discuss the relative merits of the proposals, considering how the proposal benefits the entire statistical community. That discussion will provide input into the decision of the Chief Statistician and the Census Bureau Director.

The operations of the subcommittee will not replace existing review and evaluation mechanisms. For example, the Paperwork Reduction Act of 1995 (PRA) and OMB's implementation regulations¹ and guidance, including required *Federal Register* notices, continue to apply, as do OMB statistical policy directives. Census Bureau standards for cognitive interviewing and field pre-testing of questions, as well as any other Census Bureau or Commerce Department established processes for the survey review also will remain in place.

¹ <https://www.gpo.gov/fdsys/pkg/CFR-2016-title5-vol3/xml/CFR-2016-title5-vol3-part1320.xml>

6. Key policies and practices for use of the ACS

It is envisioned that there will be a continuing need for the ICSP-SACS to examine and consider how to apply common decision criteria for adding a question to the ACS, revising a question on the ACS, deleting a question from the ACS, using the ACS as a frame for follow-on surveys, and including a module of questions on a subsample of ACS cases. The principles for these decisions are described more fully in the following subsections.

6.1 The decision to add a question to ACS

The decision to add a new question to the ACS should be considered under the following decision criteria as well as the principles of practical utility and respondent burden codified in the Paperwork Reduction Act (PRA).

- The data are needed for effective and efficient administration of the survey (e.g., telephone number).
- Federal law² specifies that the ACS must provide estimates on a topic for a specified population for small populations or small areas of the country (i.e., Census tracts and block groups).
- Federal law designates that the Census Bureau must provide estimates on a topic for small populations or small areas of the country (i.e., Census tracts and block groups) on an ongoing basis. Federal law states that the small area or small population estimates must be provided but is not specific as to the source agency or survey, and there are no other sources that could reasonably meet the information needs.
- A Federal Government agency justifies a need for new survey measurement on a specific topic to provide small area statistical information and/or to assist in program administration, and the ACS is the most viable source from a cost and burden perspective.

Meeting one or more of these criteria will be considered necessary, but not sufficient conditions for including the question on the ACS. The availability of administrative data (Federal, state, other governmental, or third-party data) to provide the requested statistical information shall also be considered.³ The subcommittee will consider whether the requested statistics could be produced for a topic without adding a question to the survey itself. In addition, the subcommittee should establish a process for reviewing the justifications for the current content and establishing priorities. The Census Bureau should conduct regular, periodic reviews of the ACS content. These periodic reviews should be designed to ensure that there is clear and specific authority and justification for each question to be on the ACS, the ACS is the appropriate vehicle for collecting the information, respondent burden is being minimized, and the quality of the data from ACS is appropriate for its intended use. Results of these reviews should be shared with the subcommittee to provide feedback.

² “Federal law” includes statutes, Congressional directives in appropriations act reports, Executive Orders, and agency regulations.

³ As directed in Title 13 U.S. Code Section 6, the Census Bureau is encouraged to use administrative data: “To the maximum extent possible and consistent with the kind, timeliness, quality and scope of the statistics required, the Secretary shall acquire and use information available...instead of conducting direct inquiries.”

It is expected that all proposed new questions will be subject to normal development and pretesting prior to being considered for inclusion on the ACS (see also section 6.3).

6.2 The decision to change or revise a question currently on the ACS

The decision to revise a question on the ACS should be considered whenever there is a legal, regulatory, or administrative change to a program, or changes in socio-economic behavior that affects the information the agency needs or how the agency will use the information it obtains from the ACS (see also section 6.4). Agencies shall provide documentation of these changes in their proposals to the subcommittee. In addition, because a cornerstone of the ACS is multi-year estimates, it is expected that there will be minimal year-to-year changes in ACS questions. However, regular reviews and analysis should examine each question on the ACS. Questions should be considered for revision based on socio-economic changes (within the scope of the existing criteria specified in section 6.1). Questions should also be considered for revision if there is evidence of measurement error (from either quantitative analysis or qualitative testing) that could be reduced through revising the question wording, placement, response categories, etc.

It is expected that all proposed revised questions will be subject to normal development and pretesting prior to being considered for inclusion on the ACS (see also 6.3).

6.3 The process for proposing new or revised questions for the ACS and pretesting requirements.

It is expected that agencies will consult informally with the Census Bureau's ACS Office and OMB's Statistical and Science Policy Office staff when considering whether to make a proposal and for guidance in preparing their proposals to the ICSP-SACS. The proposals must address the decision criteria described in sections 6.1 and 6.2. The subcommittee will review agency requests and discuss the relative merits of the proposals. The subcommittee will review the agency request considering the criteria in sections 6.1 and 6.2 and provide its recommendation to the Chief Statistician and the Census Bureau Director. Only after the subcommittee has forwarded its recommendation to the Chief Statistician and the Census Bureau Director *and* the Chief Statistician has rendered judgment can testing activities begin.

If an agency request is approved, an interagency committee will be formed to draft new or revised questions, and these must be cognitively tested. If successful, the results of the cognitive testing will then be submitted for review as evidence to make a change to a question or as input to a field test that utilizes multiple ACS modes of collection. All PRA requirements must be met for these testing activities.

The results of the cognitive and field tests should be submitted back to the subcommittee along with the original justification for the new or revised question and a formal request from the agency to make the proposed change that is supported by the empirical results. The subcommittee will review the agency request considering the criteria in sections 6.1 and 6.2 and provide its recommendation to the Chief Statistician and the Census Bureau Director. The Director of the Census Bureau will determine with the Chief Statistician whether the new or revised questions will then be included in a formal submission to OMB under the PRA. If so, all

PRA requirements, including *Federal Register* notices and public comment periods on the proposed changes, will be followed to seek formal OMB approval of the revised ACS collection.

6.4 The decision to delete a question from ACS

The decision to delete a question or set of questions from the ACS should be considered whenever there is a legal, regulatory, or administrative change to a program, or socio-economic behavior change resulting in a question or set of questions no longer being needed, including cases when a substitute question or questions may be required. In addition, regular reviews and analysis should examine the use of each question on the ACS. Questions should be considered for deletion if there is no evidence of regular use of statistical information for small area or small population estimates by any Federal Government program or by other users.

A question may also be removed from the ACS survey when sufficient administrative data of high quality exists to produce reliable statistics. In this case, statistics would still be produced from the Census Bureau on the topic, but data would come from administrative sources rather than direct collection from the public. The subcommittee will be asked to weigh in on such proposals. Such proposals will also be included in formal submission to OMB under the PRA for public comment.

6.5 Use of the ACS as frame for follow-on surveys

The use of ACS as a platform to launch follow-on surveys is attractive when ACS is viewed as a first phase measurement to identify a subset of cases, defining the target population for the follow-on survey. The use of the ACS as a sampling frame needs to be carefully managed given the mandatory nature of the ACS. The voluntary (or mandatory) nature of any follow-on survey must be made clear to respondents. Furthermore, Federal law should specify the collection of the data or Federal program administration should depend on estimates based on the data from the follow-on survey. In addition, requests for follow-on surveys must be weighed in the context of other actual or potential follow-on surveys.

The ACS should be considered as a frame for a follow-on survey only when the eligible target population is a very rare subset of the U.S. household population, large cost savings accrue to the Federal Government by using ACS versus alternatives, small area or small population estimates are critical to the follow-on survey, and the level of additional burden on the follow-on survey respondents (the number of interviews and number of questions) is warranted given the value of the statistical information derived from the survey. In addition, the follow-on survey should not negate the use of the respondents for other potential measurement needs (i.e., their participation propensities are not severely damaged for other measurements because of the follow-on survey), nor should the use of ACS respondents for the follow-on survey interfere with other ACS higher priority uses.

6.6 Decision to include a question module on a subsample of ACS units

Another potential future use of the ACS is to add a module of questions as a supplement to the ACS questionnaire provided to respondents. Any module would be a voluntary survey.

An ACS supplement could be included for all ACS cases in one or more months. It is most likely that these measures would be thematically consistent and provide broader measurement than is currently available. Similar to the case of follow-on survey decision criteria, these criteria are likely to evolve over time as experience is gained.

Federal law should specify the collection of the data or Federal program administration should depend on estimates based on the data from the module. Requests for a question module must also be weighed in the context of other requests, burden on respondents, and must not threaten the quality of participation in the base ACS; that is, the ACS must not be harmed by the addition of the module. In addition, there should be cost savings that accrue to the Federal Government by using the ACS design versus alternative sample designs on other frames, there should be no other suitable survey vehicles (such as the Current Population Survey) that reasonably could be used instead of the ACS, and simultaneous measurement of the question module and ACS variables on the same household should be important.

There are also practical and operational issues that must be met for a question module on the ACS. Specifically, there must be feasible survey methods to incorporate the module into ACS; the use of internet, mail, telephone, or face-to-face modes must be appropriate to the measurement goals; the use of proxy reporting for persons in the household as a strategy is acceptable for the measurement; and sampling variance targets should not require the sample size of the entire ACS for a given period of use.

7. Authority

The ICSP-SACS will serve as a resource for OMB to inform its decision making with respect to the Federal statistical system, and to assist OMB in its review of the ACS and other Federal household surveys. The statistical policy roles of OMB were formalized in the PRA of 1980 and were expanded upon in the 1995 reauthorization. Specifically, Section 3504 (e) includes the following:

With respect to statistical policy and coordination, the Director of OMB shall:

- (1) coordinate the activities of the Federal statistical system to ensure -
 - (A) the efficiency and effectiveness of the system; and
 - (B) the integrity, objectivity, impartiality, utility, and confidentiality of information collected for statistical purposes; ...
- (3) develop and oversee the implementation of Government-wide policies, principles, standards, and guidelines concerning --
 - (A) statistical collection procedures and methods;
 - (B) statistical data classification;
 - (C) statistical information presentation and dissemination;

(D) timely release of statistical data; and

(E) such statistical data sources as may be required for the administration of Federal programs

(4) evaluate statistical program performance and agency compliance with Government wide policies, principles, standards and guidelines; ...

In addition, the ICSP was established by the Chief Statistician of the United States at OMB in 1989 to assist in carrying out OMB’s role in setting and coordinating statistical policy. The ICSP was codified in the 1995 reauthorization of the PRA in Section 3504 (e)(8):

(8) establish an Interagency Council on Statistical Policy to advise and assist the Director in carrying out the functions under this subsection that shall—

(A) be headed by the Chief Statistician; and

(B) consist of—

(i) the heads of the major statistical programs; and

(ii) representatives of other statistical agencies under rotating membership;

8. Amendments and Revisions to this Charter

It is expected that the activities of the ICSP-SACS will evolve over time and that this charter will be periodically updated to reflect those changes in activities. However, the principles that underlie those activities will remain – namely that the ICSP-SACS offers to the OMB Chief Statistician and the Census Bureau Director the recommendations of a set of statistical agency heads knowledgeable about the overall mission of the Federal statistical system, schooled in modern survey practice, and wise with regard to the informational needs of the country. Amendments and revisions to this charter must be approved by the ICSP.

9. Amendment and Revision History

Date approved	Description of amendment or revision
August 10, 2012	Initial release.
November 15, 2017	Charter language modified to more accurately reflect the roles and responsibilities of the ICSP-SACS.
January 11, 2023	Language modified to reflect the use of administrative data. Approved by the ICSP.

This charter is effective as of the date approved in the ICSP full council meeting and remains in effect until modified or rescinded.

Revision Approved January 2023