



December 17, 2014

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

Re: Proposed Information Collection; Comment Request; The American Community Survey Content Review Results (Document Citation: 79 FR 64743)

Dear Ms. Jessup:

The National Women's Law Center (the Center) is a non-profit, non-partisan organization that has been a leader in analysis and advocacy to promote policies that improve the lives of women and their families.

We appreciate the opportunity to respond to the proposed information collection published by the Census Bureau (the Bureau) on October 31, 2014 at 79 Fed. Reg. 64743, which would eliminate certain questions from the American Community Survey (ACS).

As the Bureau recognizes, the ACS gives "communities the current information they need to plan investments and services [and]...generates data that help determine how more than \$400 billion in federal and states funds are distributed each year."ⁱ Additionally, the ACS provides researchers unique state- and community-level data with which to assess the current status of American communities and the impact of policies on these communities. The Center has frequently used the ACS for these purposes and we consider the ACS essential to our work.

We are concerned, however, that the Bureau is proposing eliminating six questions from the ACS, one regarding undergraduate field of degree and five regarding marital status and events pertaining to marital status. The Bureau's method of classification identifies these six questions as both Low Cost and Low Benefit. While the questions certainly appear Low Cost for respondents, there are several benefits to retaining these six questions.

With regard to undergraduate field of degree, the Bureau has used this information to document racial and gender disparities in educational achievement, employment, occupation, and incomes.ⁱⁱ Using the very question being proposed for elimination, undergraduate field of degree, the important 2013 publication, *Disparities in STEM Employment by Sex, Race, and Hispanic Origin*, shows that women, Hispanics, Native Americans, and African Americans with science and engineering undergraduate degrees are less likely to be employed in STEM occupations than men or whites who hold these degrees.ⁱⁱⁱ Specifically with regard to gender, the report makes the critical point that "[e]ven among science and engineering graduates, men were employed in a STEM occupation at about twice the rate of women."^{iv} The report also identifies income disparities, noting that, "[a]mong science and engineering graduates that worked full-time, year-round, men earned \$85,000 per year compared with \$58,800 among women."^v Such

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important analyses would be impossible should the question regarding field of undergraduate degree be eliminated.

With regards to the battery of questions relating to marital status, these questions are particularly important for women for several reasons. First, voter identification laws are disproportionately likely to affect women because they are more likely to change their name after a change in marital status.^{vi} Largely because of name changes, researchers have found that “only 66% of voting-age women with ready access to any proof of citizenship have a document with current legal name.”^{vii} Knowing how many women are experiencing changes in marital status, particularly by state, is critical in assessing the impact of voter identification laws.

Questions that establish the frequency and type of changes in marital status are also important because eligibility for certain benefits or shares of property are affected by marital status. For example, eligibility for and the amount of premium tax credits under the Affordable Care Act can be affected by changes in marital status; knowing how frequently those changes occur in different populations can help Health Insurance Marketplaces plan more effective outreach about the need for participants in the Marketplaces to update their information and to prepare for handling necessary adjustments. Information about changes in marital status over time also can help with estimating women’s retirement security—predicting how many workers also may qualify for Social Security benefits as a spouse when they retire and how many divorcing spouses each year may need help ensuring that pensions and retirement savings are divided equitably. Women are far more reliant than men on Social Security spousal benefits and income from a spouse’s pension.

Finally, changes in marital status can have both economic and social impacts on the members of a household. To understand those impacts, it is important to know not only current marital status, but how frequently and recently that status has changed.

In sum, these six questions are critical for many important research questions and, particularly in light of their low cost, we strongly urge the Bureau not to eliminate them.

The Center appreciates this opportunity to comment.

Sincerely,



Joan Entmacher
Vice President, Family Economic Security



Katherine Gallagher Robbins
Senior Policy Analyst, Family Economic Security

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- ⁱ U.S. Census Bureau, “About the American Community Survey,” *available at* http://www.census.gov/acs/www/about_the_survey/american_community_survey/ (last visited Nov. 18, 2014).
- ⁱⁱ Liana Christin Landivar, *Disparities in STEM Employment by Sex, Race, and Hispanic Origin* (Sept. 2013) *available at* <http://www.census.gov/prod/2013pubs/acs-24.pdf>.
- ⁱⁱⁱ *Id.*, pp. 4, 19-24.
- ^{iv} *Id.*, p. 21.
- ^v *Id.*, p. 23.
- ^{vi} Reid Wilson, Five reasons voter identification bills disproportionately impact women, Nov. 5, 2013, Washington Post *available at* <http://www.washingtonpost.com/blogs/govbeat/wp/2013/11/05/five-reasons-voter-identification-bills-disproportionately-impact-women/>.
- ^{vii} Brennan Center for Justice at NYU Law School, Citizens Without Proof, (Nov. 2006), 2 *available at* http://www.brennancenter.org/sites/default/files/legacy/d/download_file_39242.pdf.

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