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January 6, 2025

Ms. Sheleen Dumas
Departmental PRA Clearance Officer
Office of the Under Secretary for Economic Affairs
U.S. Department of Commerce
Washington, DC 20230

Submitted via email to: acso.pra@census.gov

Dear Ms. Dumas:

On behalf of the coalition we lead, [The Census Project](https://www.thecensusproject.org), we are pleased to submit comments in response to the U.S. Census Bureau's request for an extension of the American Community Survey (ACS) and Puerto Rico Community Survey, published in the Federal Register (Docket Number USBC-2024-0029).

The Census Project is a broad-based coalition of census stakeholders and data users from the public, private, non-profit, and academic sectors that support the Census Bureau's mission, including its conduct of the decennial census and ACS.

Since 2022, The Census Project has issued [an annual report](#) highlighting the survey's myriad uses and outlining how it could be enhanced to better aid the nation as we address confounding demographic and socioeconomic changes in our nation's population. The three major findings of the report are:

- The ACS provides critical social, economic, housing, and demographic data about our nation every year, for communities large and small.
- All census-guided federal spending depends on the ACS in some way, shape, or form. For example, in 2017, 316 federal spending programs distributed more than \$1.5 trillion to states and local areas on the basis, in whole or in part of data derived from the ACS.
- The operational challenges threatening the ACS have been persistent and worsening year by year, and a national initiative is urgently needed to ensure the ACS can deliver high quality, accurate data reflecting the nation's increasingly complex population.

In addition to these findings, our report makes seven recommendations to enhance the ACS:

- Fully integrate the ACS in the Census Bureau's enterprise transformation initiatives.
- Develop new ACS data products and tools to upgrade data users' access to ACS data and address more complex public policy challenges.
- Accelerate research to advance the use of administrative records and alternative data sources in the ACS to improve data quality and reduce respondent burden.
- Enhance ACS nonresponse follow up operations to achieve higher response rates, address inequitable data quality and upgrade local community stakeholder engagement to promote response.
- Increase the annual survey sample size to better serve rural, remote and underserved areas of the country.
- Revise ACS content to improve data quality.
- Increase funding by Congress to the ACS program overall.

As the Bureau considers extending the ACS, we urge the agency to consider our report's findings and recommendations.

Sincerely,



Howard Fienberg
Census Project Co-Director



Mary Jo H. Mitchell
Census Project Co-Director