

THE U.S. CENSUS BUREAU'S RESPONSE TO HUD'S TECHNICAL ASSISTANCE REQUESTS

The U.S. Census Bureau has developed responses and information for the following technical assistance request for the Housing and Urban Development's negotiated rule making committee.

1. TA REQUEST 10: ACS AIAN ALONE COUNTS:

How and why the ACS estimates for the size of American Indian and Alaska Native (AIAN) alone population nationally and in a substantial number of reservation areas and counties with predominantly off-reservation populations are well below the size of this population as counted in the 2010 decennial census?

This question comes from the following papers that some committee members circulated during the first days of the negotiated rulemaking meeting.

The first paper is "*The American Community Survey: Serious Implications for Indian Country*", October 11, 2010 written by Norm DeWeaver, Consultant for the National Congress of American Indians Policy Research Center.

http://ihbgrulemaking.firstpic.org/images/Library/Needs_workgroup_handout_4-24-14_ACS_SeriousImplications.PDF

The second paper is titled, "*Comments on Census Bureau Evaluation Report on ACS Coverage Measured by Comparison with the 2010 Decennial Census*", relates to the Census Bureau's ACS Research and Evaluation report #ACS13-RER-1 dated January 16, 2013 and prepared by John Jordan and Michael Beaghen. The report estimates the coverage of the pre-controlled 1 year ACS estimates for 2010 by comparing these for various groups and geographies with the results of the 2010 decennial census.

http://ihbgrulemaking.firstpic.org/images/Library/Needs_workgroup_handout_4-24-14_Census_Evaluation_of_ACS_coverage_DeW_comments.pdf

The third paper is titled, "*American Community Survey Data on American Indian/Alaska Native Population: A Look behind the Numbers*" by Norm DeWeaver, February 18, 2013.

http://ihbgrulemaking.firstpic.org/images/Library/Needs_workgroup_handout_4-24-14_ACS_data_NormDeWeaver.pdf

The paper reports their analysis of ACS AI/AN alone counts for federal reservation and county areas. It also reports on an independent analysis by Jonathan Ong and Paul Ong at UCLA that looked at the issue of accuracy of the ACS counts for the AI/AN population at the national and sub-state levels, focusing on Los Angeles and other major metropolitan areas in CA. Analysis was conducted on the ACS 3-year estimates covering period 2009-2011. They concluded that there was a serious undercount of the AI/AN population, while the AI/AN multi-racial population was over counted.

The workgroup would like to have someone from the Census address the concerns raised in the papers.

Please see the bullet points for comparing estimates for the AIAN population from ACS to Census as presented during the July 29, 2014 meeting.

- Overall the coverage error for AIAN Alone or in Combination in the ACS is low
- Using population estimates built from the decennial census helps correct for under coverage
- Important to note that 5-year estimates will have a lag effect
 - Total population from ACS 5-year estimates will be an average over the five years
 - For a steady growing population, expect that all 5-year estimates prior to 2008-2012 to be lower than 2010 Census
- Coverage of AIAN Alone population is more difficult to gauge
- Fluidity in race reporting may be one contributor to this
- Census Bureau is working on a detailed match study
 - Match Census 2000, 2006-2010 ACS 5-year, and 2010 Census
 - Expected to be released in late summer 2014
- Helps show the fluidity in race reporting between decennial censuses and the ACS. Some highlights:
 - Only 70% of those matched who responded AIAN Alone in 2010 Census responded in the same manner on the ACS
 - Also flows both directions who respond as AIAN in one but not the other
- Full report has much more detail and information on race response changes that focuses on American Indians and Alaska Natives is now available. Please see the links below.
- <http://researchmatters.blogs.census.gov/2014/08/15/race-response-changes-by-american-indians-and-alaska-natives-between-the-2000-census-and-2010-census/>
- And to the paper:
- https://www.census.gov/srd/carra/Dynamics_of_Race.pdf

2. TA REQUEST 15, PART 1: ANY CHANGES TO THE SUBJECT CHARACTERISTICS, DEFINITIONS, SURVEY INSTRUMENTS, OR QUESTIONS IMPLEMENTED BY THE ACS SINCE 2005

Changes to content and instructions:

Significant question modifications (2008):

- Rooms and bedrooms –
 - Made it a “fill-in-the-blank” rather than a categorical question.
 - Included the following clarifying instruction in the rooms question:
 - Rooms must be separated by built-in archways or walls that extend out at least 6 inches and go from floor to ceiling. INCLUDE bedrooms, kitchens, etc. EXCLUDE bathrooms, porches, balconies, foyers, halls, or unfinished basements.

- For bedrooms, linked the question to the rooms question by asking “How many of these rooms are bedrooms?” Also added an instruction to enter “0” if the unit was an efficiency or studio apartment.
- Plumbing and kitchen facilities –
 - Plumbing facilities – Before, we asked if the housing unit has all three types of facilities (hot and cold running water, flush toilet, and bathtub/shower). Now, we ask each as a separate question.
 - Kitchen facilities – Before, we asked if the housing unit has all three types of facilities (sink with a faucet, stove/range, and refrigerator). Now, we ask each as a separate question.
- Disability –
 - We changed the question because we felt the questions led to collecting inconsistent data. Numerous changes were made to the questions.
- Employment status –
 - We previously asked one long question to determine if the person worked last week: “LAST WEEK, did the person do ANY work for either pay or profit? Mark (X) the “Yes” box even if the person worked only 1 hour or helped with out pay in a family business or farm for 15 hours or more, or was on active duty in the Armed Forces.”
 - We broke the question into two questions: “LAST WEEK, did this person work for pay at a job or business?” If no, we then ask: “LAST WEEK, did this person do ANY work for pay, even for as little as one hour?”
- Relationship –
 - Instead of one category for son or daughter, we broke it out into three categories: Biological son or daughter, adopted son or daughter, and stepson or stepdaughter.
 - Instead of one category for in-law, we broke it out into two categories: Parent-in-law and son-in-law or daughter-in-law.
- Weeks Worked –
 - Went from a “fill-in-the-blank” to two categorical questions to improve the quality of reporting full-time work status
- Telephone service –
 - Added a reference to include cell phone service
- Housing value –
 - Went from a categorical question to a “fill-in-the-blank” to improve the ability to adjust for inflation
- Tenure –
 - Clarified wording to take out the words “cash rent”, which people took to mean paying rent in cash (as opposed to a check)

Questions added

- Health insurance and coverage (2008)
- Veterans service-connected disability (2008)
- Marital history (2008)
- Field of bachelor’s degree (2009)
- Computer and Internet use (2013)

Questions removed

- Amount of food stamps received (2008)
- Years in military (0-2 years and 2+ years) (2008)

3. TA REQUEST 16: ACS METHODOLOGY

http://ihbgrulemaking.firstpic.org/images/Library/TA_Request_Form16.pdf

Attached below is the list of six Technical Assistance questions from above pdf.

1. Provide the definition of “American Indian or Alaska Native,” household,” “room,” “family,” and any other subject characteristics relevant to IHBG formula variables, which are utilized by the 2010 Census and/or the American Community Survey.

ACS Definitions -

American Indian or Alaska Native - refers to a person having origins in any of the original peoples of North and South America (including Central America) and who maintains tribal affiliation or community attachment. This category includes people who indicated their race(s) as "American Indian or Alaska Native" or reported their enrolled or principal tribe, such as Navajo, Blackfeet, Inupiat, Yup'ik, or Central American Indian groups or South American Indian groups.

Household - A single individual or group of people living together in a housing unit is defined as a household. Anyone listed on the roster, living in or spending time in the sample unit for 2 months or longer

Room - Area used for living purposes, such as living rooms, dining rooms, kitchens, bedrooms, finished recreation rooms, family rooms, enclosed porches suitable for year-round use, etc.

Family - Person related to the householder.

2. An explanation of how a “complete” ACS survey is defined, how data is imputed if a specific question on the ACS survey is left incomplete or is refused, and how noninterviews (included but not limited to, refusals and “unable to locate” cases) impact the size of future ACS monthly samples for a tribal area

Definition of a Completed/Sufficient Partial Interview by Mode -

Computer Assisted Personal Interview (CAPI), Computer Assisted Telephone Interview (CATI)

Completed interview - All housing and person level questions have been answered for all eligible persons on the roster.

Sufficient partial - All housing questions have been answered.

Definition for Completed and Sufficient Partial for Internet and Mail

Any Internet case where the responses passed the data defined person rule is defined as a completed internet interview.

An Internet sufficient partial is defined based on the number of people in the household. If it is a single-person household, sufficient partial is obtained by clicking the "next" button on the last housing questions. If it is a multi-person household, sufficient partial is obtained by landing on the *pick next person* screen.

A paper fully complete is defined by a non-blank form that passes the data defined person rule.

A paper sufficient partial is defined based on the amount of data provided on the paper form for people, also known as a Data Defined Person.

A Data Defined Person (DDP) is one where at least one of the following conditions is true:

- A Roster name exists, where name is at least 3 chars from Last Name + First Name.
- At least 2 questions from the roster are answered, not including name. For the first person on the roster, the relationship to householder (i.e., person one) question does not count because the response is pre-checked on the form.
- At least 3 questions from the detail section are answered, not including name (DDP-Detail) and a detail name exists, where name is at least 3 chars from Last Name + First Name.

3. A breakdown of the total number of surveys in the ACS monthly sample, the total number of “complete” responses and the total number of non-responses per month for each tribe for the past five years, including surveys classified as “unable to locate” by tribe/formula area.

Attached please find the research report *American Community Survey Response and Nonresponse Rates for American Indian and Alaska Native Geographic Areas, July 29, 2014.*

[ACS14-RER-24 ACS Response and Nonresponse Rates for AIAN Geographic Areas.pdf](#)

The following paper will be posted to:

http://www.census.gov/acs/www/library/by_series/acs_research_evaluation_program/

4. A list of tribes for which ACS utilizes the full set of interview/contact procedures (i.e., mailing of; pre-notice letter, questionnaire, reminder card and replacement questionnaire: phones calls, and personal visit), and a list of tribes for which a personal visit at the housing unit is the initial method of contact with the respondent.

Our first choice is to utilize the full set of interview/contact procedures. The only time we start with a personal visit to a housing unit is if we do not have a mailable address for the housing unit. Note that we do not mail to P.O boxes as we do not know the physical location of the housing unit using that box.

Therefore, we do not decide which set of procedures to use based on the type of area, like a tribal area. It is strictly address based.

5. An explanation of how “response rates” are computed for ACS as well as the difference between survey “inclusion rates” and “response rates” for specific areas or groups. List the ACS response and inclusion rates for each for each of the NAHASDA recipients.

Response rates measure the percentage of sampled cases that responded to the survey. The numerator of the rate is the number of units that responded to the survey and the denominator is the number of units that were included in the final sample after subsampling for the personal visit phase of the survey. The data are weighed for the final probability of selection into the ACS sample. It basically tells you, of the cases we sampled, what percentage provided data. We are providing you the response rates for each tribal area.

To contrast, inclusion rates, also called coverage rates, measure not only the effects of nonresponse, but also the fact that the sampling frame used to select the ACS sample may not be complete. To calculate the coverage rates, we have to first have a measure of what is an independent “truth” for an area.

For the ACS, that truth comes from the Census Bureau’s Population Estimates, the Bureau’s official estimate of the population. The population estimates are based on the results of the decennial census, and projected forward to July 1 of each year using various administrative records. They provide estimates of the total resident population for states and counties by age group by race by Hispanic origin. The American Community Survey uses the Population Estimates to adjust the weights for people and housing units to mitigate the effects of coverage error, so that the ACS estimates represent the whole population.

ACS calculates coverage rates to measure the impact of those weight adjustments on the estimates. Coverage rates are calculated for the total resident population by sex at the national, state, and Puerto Rico levels, and at the national level only for total Hispanics, and non-Hispanics crossed by the five major race categories: White, Black, American Indian and Alaska Native, Asian, and Native Hawaiian and Other Pacific Islander.

The numerator of the coverage rate is the estimate of the population of interest from the American Community Survey, weighted for the final probability of selection into the ACS sample, and the denominator is the estimate of that population from the Population Estimates program. For example, if the estimate of American Indian or Alaska Native people in a state is 95,000, but the Population Estimates program says there are 100,000 American Indian or Alaska Native people in the state, the coverage rate is $95,000/100,000 = 95$ percent.

Unfortunately, we can only provide coverage rates for areas that we have data from the Population Estimates program to use as “truth”. Therefore, we cannot provide coverage rates for tribal areas.

6. Any research papers or other materials developed or published by the Census Bureau or OMB concerning the impact of public relations, outreach and/or advertising on survey response rates and/or the quality, precision or accuracy of survey data.

Below is a list of 2010 Communications research papers. #8 focuses on ACS.

Audience Segmentation Research

1. [Segmenting the Population for the Census 2010 Integrated Communications Campaign](#) [PDF-3MB]
2. [Audience Segmentation for the Census 2010 Communications Campaign: Findings from the 2008 Dress Rehearsal](#) [PDF-184K]
3. [2010 Census AIAN Audience Segmentation and Evaluation](#) [PDF-3MB]
4. [Predicting Return on Investment Across Population Segments in a Social Marketing Campaign](#) [PDF-1MB]
5. [Census Barriers, Attitudes and Motivators Survey \(CBAMS\) Methodology Report](#) [PDF-8MB]
6. [Messaging to America: Census Barriers, Attitudes and Motivators Survey Results](#) [PDF-4MB]
7. [Census Barriers, Attitudes and Motivators Survey Analytic Report](#) [PDF-14MB]
8. [Using the American Community Survey to Validate and Enhance Population Segmentation for the Census 2010 Integrated Communications Campaign](#) [PDF-4MB]
9. [2010 Census Communications Campaign Creative Copy Testing Summary of Results](#) [PDF-1MB]
10. [2010 Census Communications Campaign Creative Copy Testing \(Phase 1\) Final Summary Report](#) [PDF-11MB]
11. [2010 Census Communications Campaign Creative Copy Testing \(Phase 2\) Summary of Results](#) [PDF-102K]
12. [2010 Census Communications Campaign Creative Copy Testing \(Phase 2\) Final Summary Report](#)

Themes and Creative Expression Research

13. [Phase 1 Report - Qualitative Research: Unifying Idea Focus Groups](#) [PDF-4MB]
14. [Phase 2 Report - Final Creative Expression: Focus Group Report](#) [PDF-7MB]

4. ACS RESPONSE RATES BY COUNTY AND AIAN AREAS (PREFERABLY SUM LEVEL 282, BUT 280 COULD WORK TOO)

See request #3 above for research report.

5. HOW IS AN AIAN AREA CHOSEN FOR SAMPLE AND HOW OFTEN IS THIS DONE BY YEAR?

All geographic areas in the U.S. are eligible for sample selection every year in the American Community Survey. We use size (based on estimated occupied housing units) of the governmental entities and statistical areas in order to determine the sampling rates for each census block with higher sampling rates used in smaller areas. We then randomly select addresses for interview from our address list using those sampling rates. In AIAN areas, we adjust the size used to determine the sampling rates by the proportion of American Indians in that AIAN area. This makes the sizes of the AIAN areas appear smaller when we determine our sampling rates and thus we tend to assign higher sampling rates to AIAN areas as a result of this adjustment.

The attached spreadsheet provides the rounded count of housing unit addresses in sample for 2008 through 2012 by American Indian Area. The geography reflects the geography as of 2012, which is consistent with our 2008-2012 5-year data products and our published 5-year quality measures. Note that the ACS also sample populations that live in group quarters facilities which is not shown here.

[ACS-Rounded-Housing-Unit-Address-Sample-Sizes-2008-2012-AIAN \(July 23, 2014\) - delivered.xlsx](#)

SUGGESTED RECOMMENDATIONS FROM STUDY GROUP

The following recommendations were received from HUD on June 18, 2014 to take into consideration from the Study Group.

1. CAN QUESTIONS TO ACS BE TWEAKED OR CHANGED?

Jim Treat stated during the April 23, 2014 meeting that OMB was the ultimate determining agency for survey; however tribes may request formal consultation to discuss their recommendations.

2. HOW CAN HUD/THE COMMITTEE SUBSIDIZE LARGER OVERSAMPLES TO INDIAN COUNTRY? HOW MUCH WOULD IT COST?

- The ACS does not have provisions for agencies or groups to contribute funding to increase the sample for a group of interest.

- A larger sample will improve the reliability of estimates but will not necessarily cause the estimates to change.
- The cost would be about \$100-\$150 a case:
 - Increase sample from about 100,000 to 150,000 would be about \$5,000,000-\$7,500,000 a year.
 - Increase sample from about 100,000 to 200,000 would be about \$10,000,000-\$15,000,000 a year.
 - There could be some concerns about respondent burden.

3. HOW CAN HUD/THE COMMITTEE SUBSIDIZE A SUPPLEMENTAL ACS MODULE FOR INDIAN COUNTRY?

The current ACS infrastructure does not support adding questions for selected areas (a supplemental module). Work would need to be done to enhance the existing systems and processes in order for the Census Bureau to add a module to the survey. In addition, the Census Bureau would need to work with the sponsoring federal agency (e.g., HUD) and the Office Management and Budget (OMB) on the question topics/wording. The Census Bureau would need to conduct research on the proposed question wording to ensure we are collecting accurate information and to assess the level of respondent burden. The Census Bureau would need to obtain OMB approval before we could add the questions to the survey, either as a module or on the whole survey. Finally, given that the ACS is a mandatory survey, the Census Bureau would also need to assess the policy implications of adding questions for selected areas. Depending on the number of questions and the topics, it could take up to five years for addressing the policy concerns, research into the questions/topics and redesigning existing systems, processes and questionnaires. The current ACS budget does not support this effort therefore additional funding is needed.

CENSUS BUREAU PROVIDED THE FOLLOWING REQUESTS ON JUNE 9, 2014

1. WHAT ARE THE DEFINITIONS OF AIAN GEOGRAPHIC AREAS?

There are 325 federally recognized American Indian reservations and trust lands. All in all, excluding Hawaiian Home Lands, there are 618 American Indian and Alaska Native legal and statistical areas for which the Census Bureau provides statistics.

The following definitions and delineations are for statistical data collection and tabulation purposes only. The applications of these definitions do not constitute a determination of jurisdictional authority or rights of ownership or entitlement.

Reference documents below are from the GEO webpage.

1. Geographic Terms and Concepts for American Indian, Alaska Native and Native Hawaiian Areas: http://www.census.gov/geo/reference/gtc/gtc_aiannha.html#ortl

2. The attached link includes AIA definitions for the AIAs updated every 10 years before the Census (TSAP program) as well as a link to the BAS webpage (which is the program for federal reservations) and important documents such as federal register notices: <http://www.census.gov/geo/partnerships/aian.html>

3. For other GEO definitions, including all AIAs, you can also refer to this link: <http://www.census.gov/geo/reference/terms.html>

2. ACS PROTOCOLS AND PROCEDURES WHEN CONDUCTING ACS ON AIAN AREAS.

FR MANUAL GUIDELINES FOR FIELD REPRESENTATIVES WORKING ON AMERICAN INDIAN LANDS

Conducting Interviews on American Indian Reservations

The American Indian and Alaska Native Policy Statement pledges to consult with tribal leaders and cooperate with them on any activities regarding the census that might affect their tribes. This policy applies to all activities of the Census Bureau. Since each nation forms its own government, the Census Bureau works with them one by one. Each tribe has its own customs, beliefs, and cultural norms and the Census Bureau strives to respect them all.

The diversity and sophistication of tribal governments, their functionality, and their processes varies widely from reservation to reservation and from government to government. Tribes have the inherent right to operate under their own governmental systems. Many have adopted Constitutions, while others operate under Articles of Association or other bodies of law, and some still have traditional systems of government.

For the U.S. Census Bureau, it is imperative that all Census operations, including the American Community Survey be conducted with the acknowledgement and cooperation of the tribal authority over those reservation areas.

For the first visit to the American Indian Reservation (AIR), the Regional Office (RO) management staff or RO Partnership Staff will contact the tribal government and establish a contact person for the initial visit and subsequent visits. The contact person is usually the Chairperson or Chief of the tribe. Each tribe will have their own protocol for conducting interviews on the reservation. Contact your RO if you do not know what the protocol is for a particular tribe.

On later visits, your RO may authorize you to contact the tribe directly. Some ROs may prefer that all contacts remain with the RO management or Partnership Staff.

Discuss subsequent visits with your RO prior to your contact. In either situation, the contact person must be notified before visiting the reservation. Also, it is suggested that you contact the tribal police. If the contact person is unavailable, you should ask who else should be contacted about obtaining approval to come onto the tribal area. It is important to remember the name and title of the tribal representative that gives you permission to come onto tribal areas, in case tribal members ask you.

If you need to share confidential information, such as the name of the survey or the address of the respondent with the contact person, he/she must be sworn in. When conducting interviews on an American Indian Reservation (AIR) follow the procedures below:

- Be mindful of and respect the heritage, customs, and practices of the people with whom you interact.
- Dress appropriately.
- Observe all posted signs. These might include areas that are closed to outsiders, restrictions to outsiders on tribal areas after dark, etc.
- If you are interviewing in an area requiring a specific protocol, make sure you follow the protocol at all times.
- If any situation occurs where tribal members are concerned about your presence, do not try to resolve the situation on your own. Contact your supervisor immediately and discuss the situation. You may be instructed to leave and return after the RO contacts the tribal liaison or tribal leader.
- If an interpreter is required in order to speak to the respondent, the tribe should be able to provide someone to assist. Remember to swear in the interpreter before conducting the interview.
- Be sensitive to the culture and be flexible. If the timing is inappropriate, reschedule the interview. This could be due to a culturally inappropriate situation (i.e. gender can influence who can speak to whom) or inappropriate timing (i.e. a ceremonial event occurring within the household).
- After your introduction, take a cue from the resident to determine where the interview should be conducted and where you should sit. This may be in your car, outside the home, or inside the home. Do not ask to be invited inside the home.
- Do not touch ceremonial/cultural objects such as eagle feathers, sacred bundles and ties, etc.
- When approaching a housing unit in a rural area, honk your horn and wait in the car for someone to present himself or herself if that is expected protocol in the area. Also, if there are loose dogs, this is a good way to ensure your safety.

Refusals should be discussed with the RO supervisor.

3. REGIONAL OFFICE CONTACT INFORMATION PROVIDED

Each tribal government was visited in preparation for the American Community Survey around 2004, again prior to the 2010 Census, and as needed since then to obtain permission to conduct survey interviews on their tribal lands. During these visits, tribal governments provided guidelines to be used on their lands. The Regional Office staff follows the policies and guidelines outlined in the ACS-HU FR Manual, pages 1-11 to 1-13, regarding “Conducting Interviews on American Indian Reservations.” For additional information, see Attachment 1. For specific questions about efforts with a particular tribal government, please contact the Regional Office contact listed below.

Regional Office	States Covered	Contact Person
NEW YORK	ME, NH, VT, MA, RI, CT, NY, NJ	Yarice Rodriguez (212)584-3424
PHILADELPHIA	PA, OH, KY, TN, VA, WV, MD, DE, DC	Noemi Mendez (215)717-1834
CHICAGO	MI, WI, MN, IA, MO, AR, IL, IN	Jack Walsh (630)288-9223
ATLANTA	NC, SC, GA, AL, MS, LA, FL	Margaret Kelly (404)730-3925
DENVER	ND, SD, NE, KS, OK, TX, NM, AZ, UT, CO, WY, MT	Vicki McIntire - Primary Sherry Dowell - Secondary (720)962-3703
LOS ANGELES	CA, NV, ID, OR, WA, AK, HI	Tom Szabla (818) 267-1740