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The Honorable Robert N. C. Nix
Chairman, Committee on Post Office
and Civil Service
House of Representatives

Dear Mr. Chairman:

We have reviewed H.R. 10386, cited as the "Census Act of 1977." Based on this review and conclusions reached from our study of the undercount problem in decennial censuses as reported to your Committee in 1976 ("Programs to Reduce the Decennial Census Undercount," GGD-76-72, May 5, 1976), we are providing the following comments.

The stated purpose of the proposed act is "...to provide for the collection by the Secretary of Commerce of more accurate information about the population of the United States and to provide for the analysis by the Secretary of Commerce of such information, taking into account the needs of the public in cooperating with the collection of such information."

Section 3 of the proposed act would amend sections 141 through 149, of title 13, United States Code. We are commenting on sections 142, 144 and 145. Amended section 142 (a) (1) would provide that an enumeration of the population shall have priority over all other activities of a decennial census; the aim being to improve population coverage. Specifically, amended section 142 (b) (2) would provide that an enumeration form shall consist of questions necessary to insure a complete count of the population and housing of the United States; and be limited to not more than one question on each of 10 listed items. The limitations are imposed to keep the form short in the hope of improving public response. Furthermore, amended section 142 (c) (1) would provide that additional characteristics of the population and housing shall be obtained through the use of samples based on the best statistical methods.

Based on our work at the Census Bureau, we agree that priority attention should be given to improving population enumeration. We have doubts, however, that an enumeration with even the limitations provided in section 142 (b) will

succeed in significantly improving population coverage. As an alternative to the provisions of sections 142 (b) and 142 (c), we suggest that the Bureau be required to design and test a two-part questionnaire. The first part should be designed for strictly population enumeration and the second part designed to pick up, on a sampling basis, necessary additional population and housing information.

We suggest that the first part, the population enumeration form, be more limited than provided in section 142 (b). For example, this part might simply consist of questions relating to the name of the preparer and a numerical count (instead of a listing by name) of household occupants to be reported by appropriate age, race and/or heritage, and sex classifications.

Based on our work on population coverage in the decennial census, we believe that requiring complete listings by name of household occupants may, in some cases, deter full disclosure. We believe that eliminating this requirement might encourage more complete reporting. The second part of the two-part form should be designed to pick up only essential supplementary information.

The complete questionnaire, containing both parts, might be distributed to a sample of United States households while the questionnaire containing only the first part could be distributed to 100 percent of United States households.

This approach should be thoroughly field tested to assess its potential for improving population coverage without deteriorating the reliability of essential supplementary information. We believe that since testing for possible 1980 use of new forms is not feasible, special tests of various versions of a two-part questionnaire could be conducted concurrently with the 1980 census. Thus the various versions of newly designed questionnaires can be compared with each other and with the actual census questionnaires. The most successful questionnaire should then be used to guide the design of subsequent mid-decade and decennial census questionnaires.

Amended section 144 (a) would provide greater latitude for the mid-decade census than is provided for the decennial census. We suggest that provisions applicable to the decennial census also be applicable to the mid-decade census.

Amended section 145 would provide that the Secretary of Commerce report to the Congress on evaluations of tests relating to the decennial census proposals. In addition to the evaluation information required, provisions should be made to provide expected costs of pretests as well as forecasted decennial census costs. Such information would allow the Congress to better evaluate the decennial census program in relation to its forecasted costs.

Section 4 of the act would add several new subsections to title 13, United States Code. Our comments relate to new section 185 (a) which provides that the error attributable to each determination estimate used by the Secretary be specified for each State and unit of local government. Also, it provides that any department or agency of the executive branch which determines benefits for such units of government, on the basis of determination estimates as required under Federal laws, shall under the proposed bill also use the estimate of error attributable to those determination estimates in making benefit allocations.

We believe the bill should be more specific on this point. First, the bill should specify how benefits are to be modified with varying degrees of determination estimate errors. And second, we believe that it would be useful if the Secretary was required to certify determination estimates, on the basis of error estimates, as either appropriate for use in specific fund allocation formulas or inappropriate for use on other on-going or proposed fund allocation programs.

Section 5 of the proposed act would amend subchapter I of chapter 1 of title 13, United States Code to provide that the Secretary of Commerce, on an ongoing basis, review the projects conducted by the Bureau under title 13. Section 5 further provides that the Secretary shall appoint a Census Review Committee consisting of seven voting members chosen from among major census data users and five nonvoting ex officio members.

We agree with the concept of such independent evaluations, but do not agree that a new committee is necessary for conducting them. As an alternative we suggest that the Office of Federal Statistical Policy and Standards, recently transferred from the Office of Management and

Budget to the Department of Commerce, be responsible for such evaluations. The Secretary of Commerce when commenting on the responsibilities of this Office noted that:

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"The new Office will retain its independent status vis-a-vis all Federal statistical agencies. The Office will conduct objective analyses of individual statistical programs; these analyses will provide a basis for recommendations for improvement."

In our opinion, these responsibilities are in consonance with those that would be assigned to the proposed new committee. If the proposed responsibilities are assigned to the Office of Federal Statistical Policy and Standards, the Office will require additional resources.

Although not directly related to H.R. 10386, we have commented to several congressional leaders on the relocation of the Office of Statistical Policy and Standards from the Office of Management and Budget to the Department of Commerce. In summary, we stated that the responsibilities for Federal forms clearance, which remained with the Office of Management and Budget, and statistical policy and standards should not be separated because of their close interrelationship. We also stated that we did not believe such responsibilities should be placed in an Executive Department at an Assistant Secretary level because of the need for sufficient authority to enforce statistical policy and standards on Federal agencies. However, despite its current status, we believe that the Office of Federal Statistical Policy and Standards is a better facility for making evaluations, as required under the proposed legislation, than a new committee to be created for such a function.

Sincerely yours,

(Signed) Elmer B. Staats

Comptroller General
of the United States