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

Sent via email: jjessup@doc.gov

RE: Proposed Information Collection: Comment Request: The American Community Survey
Content Review Results Vol. 79, No. 211/October 31, 2014/pp. 64743-45

Dear Ms. Jessup,

I am writing to respond to the request for comments about the elimination of questions relating to marital history. I feel strongly that these questions are essential components of the nation's statistical infrastructure. Their elimination would severely damage our ability to understand ongoing changes in American society and to implement effective policy responses.

To understand the importance of the marital history questions, it is important to understand why they were introduced. Since the nineteenth century, statistics on marriage and divorce were derived from the vital registration system. These data were originally compiled by the Census Bureau, which published detailed reports about marriages and divorces each year. After World War II the responsibility for marriage and divorce statistics was shifted to a new agency, now known as the National Center for Health Statistics (NCHS). The main job of NCHS is to collect and analyze data on health. Marriage and divorce statistics were never central to the NCHS mission, and after 1990 the statistics on these topics began to deteriorate. In 1995, the agency concluded that the detailed statistics were no longer reliable, and decided to discontinue the program. The agency continued to collect a raw count of the number of marriages and divorces from each state. By 2005, six states representing 20% of the population had dropped out of the program, and with little funding the quality of reporting continued to decline. NCHS has reported no data whatsoever based on marriage and divorce records since 2011.

The deterioration of statistics on marriage and divorce created real problems for both planning agencies and for research in family demography. Enough data were available to know that we were in a period of unprecedented change, but not enough to understand the drivers of change or to project future trends. Two small surveys collected data on marriage and divorce—the National Survey of Family Growth (NSFG) and the Survey of Income and Program Participation (SIPP), but they had other limitations. Both surveys ask respondents to report their entire marital

histories, which leads to recall biases. Neither survey provides data on an annual basis. The NSFG only covers people of childbearing age, and the sample size is so small that the confidence intervals are too large for most applications. The SIPP was never intended for this purpose, and it greatly understates divorce rates; in the most recent SIPP data, almost half of the divorced respondents failed to report the date of their divorce, greatly compromising the quality of the estimates. The poor quality of the data is doubtless in part because the SIPP requires respondents to report not only their own entire marital history, but also the complete marital histories of everyone else in their household.

In 2004, the Department of Health and Human Services (DHHS) decided to pursue an alternative strategy to provide reliable, timely, and cost-effective data that would meet the needs of Federal agencies. DHHS requested that the Census Bureau investigate the feasibility of adding a set of questions to the American Community Survey (ACS) to address the problem. The ACS is the flagship survey of the American statistical system. The survey is very large, covering almost 3% of the population each year. This large size offered the opportunity for a new strategy for the measurement of marriage and divorce. Instead of asking for complete marital histories like the NSFG and the SIPP, the ACS could be limited to asking about marriages or divorces within the past year, greatly reducing the impact of recall bias. Moreover, by focusing on events within the past year, these questions can reveal current demographic behavior and provide a direct substitute for the vital statistics data.

The Census Bureau designed a set of five questions that together provide powerful tools for the study of marriage and divorce. In addition to the questions asking whether each person was married or divorced in the past year, there is a question on widowhood in the last year, date of last marriage, and number of times married. The latter three questions are needed for interpretation of the questions on marriage and divorce within the past year. They allow calculation of age-specific and duration-specific rates of marriage, divorce, and widowhood, which are the raw materials for population projections. These data allow analysts to build a statistical tool known as a marital status life table, which provides a detailed look at marriage patterns over the life course, and enables us to estimate the percentage of marriages ending in divorce.

In 2006 the Census Bureau conducted a comprehensive test of the new questions. The ACS strategy of measuring marital events occurring in the previous proved to be highly effective, avoiding the underreporting problems that plague retrospective surveys. The strategy does, however, impose considerable demands on sample size; we only observe demographic events if they occurred in the previous year, so to obtain comparable precision as retrospective survey that includes complete marital histories, we need 10 to 20 times the number of observations. Because the number of times married and marriage duration questions are necessary to interpret the questions on incidence of marriage, divorce, and widowhood, there is an inherent need for large sample sizes for all five marital history questions.

The marital history questions were added to the full ACS in 2008. The Census Bureau provided a legal [detailed justification](#) for the new questions, explaining the many applications of the new data for federal agencies. Perhaps the most crucial need for the marital history data is for projection models of Social Security and pension entitlements as the baby boom generation starts to retire. Most women in that generation, as in earlier generations, have earnings histories that typically qualify them for much lower benefits in their own right than they are entitled to receive

based on their spouses' earnings. This is because women born in the 1950s and 1960s earned lower wages than their husbands and the majority spent at least some of their adult years out of the labor force. Compared to women in earlier generations, however, baby-boomer women are less likely to be married (or recently widowed) at the time of retirement to the spouse upon whose earnings records their future benefits will depend, thus a higher proportion will receive at least part of their benefits based on a divorced spouse's earnings. The baby-boomer generation also includes more women who are entitled to benefits based on more than one previous marriage. Any effort to project future incomes for such retirees—and the costs of providing those incomes—must take marriage, divorce, widowhood, and remarriage into account. Without up-to-date rates broken down by age, marriage duration, and marriage order, such population projections will be inaccurate. This in turn will lead to unreliable data on the solvency of the Social Security system.

The five ACS marital history questions are not simply a substitute for the moribund system of data collected from vital records. They represent a far more powerful tool than anything that has gone before. Unlike the vital statistics system, the ACS marriage questions can be cross-classified with any of the other questions that appear in the survey. Thus, for example, we can assess differentials in marriage, divorce, widowhood, and remarriage (using the times married question), comparing such characteristics as education levels, income, and ethnicity. Because of the large size of the ACS, we can examine small population subgroups, such as intermarriages among racial and ethnic groups.

In a very brief period, the broad dissemination of the marital history data to the academic community has transformed our understanding of current trends in marriage behavior. We have new estimates of first marriage formation, remarriage, and marital dissolution that offer a level of detail and precision that have not been available for two decades. The first data were not available until late 2009; given the length of the publication cycle, one would not expect many publications to have appeared. In fact, however, the number of publications is substantial and growing rapidly, and the data have resulted in important new findings on a broad range of topics. Consider the following examples:

- Brown and Lin (2012) uncovered a massive increase in divorce among middle-aged and older couples since 1990.
- Qian and Lichter (2011) uncovered a dramatic increase in black-white first marriages, but a retreat from intermarriage among minorities with large and growing immigrant populations, especially Hispanics and Asians.
- Taylor et al. (2010) investigated the shifting relationship of remarriage to college education.
- Levchenko and Solheim (2013) explored the growing phenomenon of marriages between Eastern European-born women and U.S.-born men.
- Cohen (2012) found that the recession had little impact on divorce, except for college-educated persons in places where the recession hit hardest
- Kennedy and Ruggles (2014) found that the risk of divorce has not been declining, as many observers had thought; once we control for the aging of the married population, we can see a dramatic increase in divorce probabilities over the past three decades.

The data are being intensively used by the academic community. The IPUMS Project, which I direct, disseminates ACS public-use microdata to researchers; to date, we have received over 21,000 requests for the marital history questions, and the demand is accelerating.

Why, then, are these invaluable data being considered for removal? Over the past six months, the Census Bureau conducted a content review of all the questions asked in the ACS, with the idea of eliminating unnecessary questions and reducing the paperwork burden of the survey. For each question, the Census Bureau created an index of costs and benefits. The cost of each question was based on cognitive burden, sensitivity, complaints, median seconds to answer, and response rate. The Census Bureau determined that all five marital history questions were low cost.

The benefit calculation was far more problematic. The Census Bureau identified 13 benefits, all of which focused on the uses of the data by federal agencies. The critical flaw in the analysis is that 8 of the 13 benefits they identified focused on uses of the data to describe small geographic areas, such as census tracts or counties. Whoever designed the cost-benefit analysis apparently assumed that the only reason a question would need to be on the ACS would be to generate small-area statistics, because the ACS is the only survey large enough to be used for small-area statistics. The implicit assumption of the ACS benefits analysis is that if a question is not used to analyze small geographic areas, it should be moved from the ACS to a smaller survey. If the questions on marital events within the past year were moved to a smaller survey, however, they would be useless: only the ACS has sufficient cases to enable this powerful measurement strategy.

The benefit analysis determined that no agency was using the marital history questions for small-area analysis. This should have been self-evident: most of the marital history questions cannot be used for small-area analysis! The measurement strategy focusing on marital events within the past year requires a large number of observations, and there simply are not enough cases in the ACS to conduct small-area analysis using these questions. For example, the ACS public-use microdata file for 2013 includes 18 women who were divorced in the previous year in Alaska, 25 in Delaware, and 14 in South Dakota. By aggregating multiple survey years some sub-state analysis is feasible, but that was never the goal of these questions. They are designed to provide the detailed state and national statistics that are no longer available from NCHS, and they are currently the only available source for those statistics. If the questions are dropped, the United States will be the only developed country in the world without a reliable annual count of the number of marriages and divorces.

In sum, the Census Bureau is proposing to remove the highly successful and crucially-important questions on marital history because they are not being used for the study of small geographic places, even though these questions cannot be used to study small areas and were never intended for that purpose. Anyone in the field—including the Census Bureau's own subject matter experts—could easily have explained the inappropriateness of the benefit measures to the content review team, but apparently no experts were asked for their opinion.

I am a member of the Census Scientific Advisory Committee (CSAC), which exists for precisely this purpose. All year, CSAC made it clear to the Census Bureau that we wanted to provide input on the content review process. We learned nothing, however, until a webinar two weeks before publication of the Federal Register notice, when it was too late to improve the flawed evaluation process.

I want to briefly address another ACS question that was also inappropriately slated for removal, the question on undergraduate field of degree. The ACS is the premier source of information on the characteristics of the STEM workforce, and elimination of the question on field of degree would leave us with no data sources large enough to study small but crucial academic specializations. IPUMS users have requested the data 22,000 times since the field-of-degree question was introduced in 2009, and they have published hundreds of new studies on the impact of college majors on lifetime earnings and demographic behavior.

The field-of-degree question was introduced following recommendations of the [National Academy of Sciences](#), after an extensive program of field testing and evaluation. The primary reason for the addition was to enable the ACS to serve as the sample frame for the surveys conducted by the National Science Foundation (NSF) for the Scientists and Engineers Statistical Data System. The availability of the ACS question has reduced costs and improved quality for NSF's survey program. The ACS is the only survey suitable to provide the sample frame for the NSF surveys on the STEM workforce.

I am a member of the National Science Foundation Advisory Committee for the Social, Behavioral, and Economic Sciences. The fall meeting of the Committee was occurring just as the Federal Register notice of cuts was published. As became evident during the course of the meeting, the content review team did not consult with the subject experts at NSF before conducting the review; just like the members of CSAC, NSF learned of the outcome of the review only after it was complete, and never had an opportunity to weigh in on the measurement of the benefits of the question.

In sum, both the five marital history questions and the college field of degree question have proven invaluable. There is no alternative source for this information, and the data are essential for both the effective operation of government and for scientific understanding of changes in American society. The Census Bureau has determined that all these questions are low cost. Removing them from the ACS would seriously damage the statistical system. I urge you to reconsider.

Sincerely yours,



Steven Ruggles

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