

December 16, 2014

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

Re: FR Doc. 2014-25912

Dear Ms. Jessup:

On behalf of the undersigned associations, we write in response to the Census Bureau's Proposed Information Collection; Comment Request; The American Community Survey Content Review Results (FR Doc. 2014-25912), which appeared in the Federal Register on October 31, 2014. The associations listed include members from every sector of higher education, representing the full spectrum of American colleges and universities.

We are writing to urge the Census Bureau to retain Person Question No. 12 (Undergraduate Field of Degree) in the American Community Survey (ACS). Removing the question would harm our ability to understand the career and employment pathways and the quality of life of college graduates residing in the United States.

The rationale for removing the question appears to be that no federal law mandates or requires it, and it is listed as a "low cost/low benefit" question.¹ But collecting this information has great benefit, and not collecting it would raise the cost to the federal government.

The Undergraduate Field of Degree question was added to the ACS in 2009 after field testing and evaluation, as well as study by the National Research Council.² The National Science Foundation's (NSF) National Center for Science and Engineering Statistics (NCSES) uses the question to create a sampling pool for examining trends in the science and engineering workforce, including the status of women, minorities, and disabled persons in science and engineering. Understanding the science and engineering workforce is important to our nation's economic competitiveness and national security, which rely upon individuals trained in these disciplines. The information provided by Person Question No. 12 informs policy decision making in a cost-efficient way. The linkages between undergraduate field of degree, employment, and other outcomes are important to

¹http://www.census.gov/acs/www/Downloads/operations_admin/2014_content_review/ContentReviewQuestionsbyCategory.pdf

²http://www.nap.edu/catalog.php?record_id=12244

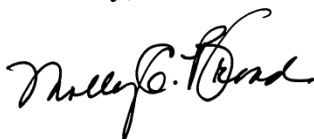
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understand across all fields, especially at a time when the value of specific majors, and of college education overall, is being questioned. The inclusion of this question in the ACS provides the basis for scholarly and applied research in these matters.

The addition of this question has saved NSF, and the federal government, millions of dollars,³ and has provided necessary information not available through other sources. A recent Census Bureau presentation lists six other federal agencies, besides NSF, that make programmatic use of this information.⁴ Were the question removed, another source for obtaining this information would need to be developed by the federal government, likely at significant new costs. The ACS is the most efficient and cost-effective way known to collect this valuable information.

We believe that the inclusion of Person Question No. 12 has yielded important information that is useful to policymakers, colleges and universities, and the public, and that it will continue to do so. Its removal would compromise understanding of how undergraduate education across fields affects the nation's workforce and individuals' quality of life. Moreover, its removal would cost the government more than it would save. We urge that this question about Undergraduate Field of Degree be included in future administrations of ACS.

Sincerely,



Molly Corbett Broad
President

MCB/ldw

On behalf of:

ACPA-College Student Educators International
American Association of Colleges of Nursing
American Association of Colleges for Teacher Education
American Association of Community Colleges
American Association of State Colleges and Universities
American Council on Education
American Indian Higher Education Consortium
American Society for Engineering Education
APPA, Leadership in Educational Facilities

³ <http://news.sciencemag.org/education/2014/11/can-question-no-12-survive-researchers-fight-retain-question-about-college-degrees>

⁴ http://www.census.gov/cac/race_ethnic_advisory_committees/docs/20141009_nac_acs_content_review_brf.pdf

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Association of American Colleges and Universities
Association of American Medical Colleges
Association of American Universities
Association of Catholic Colleges and Universities
Association of Community College Trustees
Association of Governing Boards
Association of Public and Land-grant Universities
Council of Graduate Schools
Council of Independent Colleges
Council On Governmental Relations
EDUCAUSE
Hispanic Association of Colleges and Universities
NAFSA: Association of International Educators
National Association of College and University Business Officers
National Association of Independent Colleges and Universities
University Professional and Continuing Education Association