

Commentary of Federal Register Notice 83 FR 34111.

Gordon, Sarah <sarah_h_gordon@brown.edu>

Tue 11/6/2018 01:44 PM

To: POP 2020 DataProducts <pop.2020.dataproducts@census.gov>;

Karen Battle,
Chief, Population Division
U.S. Census Bureau
4600 Silver Hill Road, Room 6H174
Washington, DC 20233

Re: POP.2020.DataProducts@census.gov

Dear Ms. Battle,

I am writing in response to your solicitation of feedback from users of Census data products (USBC-2018-0009). As a doctoral candidate at the Brown University School of Public Health, I use publicly available Census and American Community Survey data frequently in my research activities. I am concerned that a reduction in the amount or validity of detailed publicly available data will adversely impact important research occurring here and by researchers at other institutions across the country.

In my recent research, I have used publicly available Census and ACS data at ZCTA levels to determine characteristics that provide information that is not included in analysis of claims data. These include the poverty rate, median income, racial/ethnic makeup, uninsured rate, unemployment rate, and rural/urban status. For example, in a recent paper published in the journal *Medical Care*, we used zip code level data from Colorado to demonstrate that there are racial and ethnic disparities in who disenrolls from the state Marketplace early. In another study published in *Health Services Research*, we used census tract level information to impute race and ethnicity which was largely missing from Rhode Island Medicaid claims. We demonstrated in this study an important tool for obtaining critical sociodemographic information and also evaluated the impact of Medicaid managed care plan type on insurance retention. These are just a few examples of the many projects I have personally undertaken that relied heavily on ACS data. This research, and its important findings, would not have been possible without detailed publicly available and statistically valid data from the Census Bureau.

I currently have a funded grant from the Agency for Healthcare Research and Quality research projects that involve the use of Census and ACS data that is currently publicly available. If statistically valid, detailed data became more difficult or impossible to access, these projects would not be viable, or would have to be significantly reworked.

Restricting publicly available data from the Census and ACS will harm my and other researchers' abilities to study important issues. Many projects I and others have undertaken would not have occurred

without this publicly available and statistically valid data, including if this data were only available for use at the Bureau's Research Data Centers which are difficult and expensive to access.

Sincerely,

Sarah Gordon

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