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Vanita Gupta

August 13, 2017

Sheleen Dumas

Departmental PRA Lead

U.S. Department of Commerce

Office of the Chief Information Officer

14th and Constitution Avenue NW

Washington, DC 20230

Submitted via email: [OIRA\\_Submission@omb.eop.gov](mailto:OIRA_Submission@omb.eop.gov)

Re: Proposed Information Collection; Comment Request; End-to-End Test  
(Document Citation: 82 FR 32322)

Dear Ms. Dumas:

On behalf of The Leadership Conference on Civil and Human Rights, a coalition charged by its diverse membership of more than 200 national organizations to promote and protect the civil and human rights of all persons in the United States, and its Census Task Force Co-Chairs, we appreciate this opportunity to provide comments in response to the Department of Commerce's Request for Public Comment on the Census Bureau's plans for the 2018 End-to-End Census Test-Peak Operations. The Leadership Conference Census Task Force is committed to ensuring a fair and accurate census and believes that the collection of useful, objective data about our nation's people, housing, economy, and communities is among the most significant civil rights issues facing the country today.

The Leadership Conference supports the Census Bureau's efforts to spend limited fiscal resources wisely to implement the 2020 Census, in order to ensure that sufficient resources are available to conduct a fair and accurate enumeration in historically undercounted communities. However, **it is imperative that cost-saving measures do not shortchange the work that will be necessary to eliminate or reduce the disproportionate undercount of "hard-to-count" rural, low-income, minority, and immigrant communities, and young children.** In trying to strike the right balance between cost-effective operations and accurate outcomes, the Census Bureau must always choose quality over savings. To that end, we offer the following recommendations designed to achieve a census that accurately portrays all segments of population and illuminates the characteristics and conditions of all communities.

**Limiting 2018 End-to-End Test to One Site**

Paring the 2018 End-to-End Census Test to one site could put the accuracy of the census in jeopardy in many American communities. While pre-census address updating will take place in all three sites, the Pierce County, Washington, and Bluefield-Beckley-Oak Hill Area, West Virginia, sites have been eliminated from the test, leaving only Providence County,

Rhode Island. The previously planned dry runs in Washington state and the West Virginia counties offered the only opportunities to test special counting methods in rural and remote communities, including on Tribal lands. There will be no opportunity to test new Update/Enumerate methods that will be deployed in remote Alaska and on some American Indian reservations. The curtailed End-to-End Census Test no longer includes a military base and surrounding military community, eliminating opportunities to evaluate new enumeration protocols for large Group Quarters facilities and proposed new residence criteria for deployed members of the armed forces. Furthermore, the Census Bureau recently decided to incorporate Update/Leave methods for 12 million homes, yet the one remaining test site provides limited opportunity to evaluate those methods and their cost and staffing implications in the context of a fundamentally redesigned census.

Because it is dropping these two sites, the Census Bureau will use methods in 2020 that are not fully vetted, thus greatly increasing the chances of operational failures and, therefore, an undercount. Accordingly, we recommend that the Census Bureau reinstate the two canceled 2018 dress rehearsal sites. This is especially critical since budget shortfalls have already forced the Census Bureau to cancel major portions of the 2017 Census Tests, which offered important testbeds for enumerating areas without city-style addressing, such as rural and remote communities, and enumeration plans for Puerto Rico.

### **Advertising Campaign and Partnership Program**

Budget shortfalls have also caused the cancellation of the advertising campaign and Partnership Program for the End-to-End Census Test and delays in researching and developing a full communications campaign and Partnership Program. These activities keep costs down by boosting self-response and increase accuracy by targeting messages to motivate response in historically hard-to-count communities. A robust Partnership Program is especially critical in light of the realignment of the Bureau's field office structure following the 2010 Census, including plans to employ, at most, half the staffing used for the 2010 Census. For example, the Partnership Program can ensure that relevant information from the Bureau reaches community leaders in a timely way, allowing these stakeholders to share their perspectives with the Census Bureau and reducing potential confusion and concern about design changes late in the decade. Accordingly, we recommend that the Census Bureau reinstate these activities for the End-to-End Census Test, in order to fully evaluate effective strategies, messages, communication platforms, and timing for a fundamentally redesigned census in a census-like environment.

### **Utilizing Administrative Records**

The Census Bureau is evaluating the use of administrative records to obtain missing information about unresponsive households in lieu of in-person, door-to-door follow-up visits by Census enumerators. However, the implications of such a methodology for data quality and consistency and census accuracy are not clear. There are a number of questions that the Census Bureau must address and resolve before stakeholders have confidence that a broad use of these data will not compromise census accuracy or undermine the goals of eliminating the differential undercount and collecting more accurate race and ethnicity data for all communities. The Bureau will be hindered in resolving outstanding concerns about its potential use of administrative records if it conducts an End-to-End Census Test that is far less comprehensive than originally planned. We offer for the record a new report, [Administrative Records in the 2020 U.S. Census: Civil Rights Considerations and Opportunities](#), which is the culmination of a

project of the Urban Institute, The Leadership Conference on Civil and Human Rights, and the Georgetown Center on Poverty and Inequality, to examine, from the perspective of civil rights stakeholders, the benefits and risks of utilizing administrative data for the U.S. population in general and for specific vulnerable subpopulations such as communities of color, the impoverished, immigrants, homeless, those participating in government assistance programs, and others, in the upcoming census.

### **Internet Response and Technology**

The Census Bureau is promoting the internet as the primary response mode for the 2020 Census, and incorporating increased automation of administration, data collection, and field supervision. The operational changes planned and currently underway could reduce costs by up to \$5.2 billion and create a more efficient decennial census. However, to uphold its constitutional duty and ensure an accurate and fully inclusive count, the Census Bureau must prepare for potential pitfalls. Technological failures could compromise data quality and cybersecurity and reduce public confidence in the census process, thereby depressing participation. Populations at risk of being undercounted are also among the most likely to face tenuous and insecure access to the internet and other new technologies, making responding more burdensome to those hardest to count and more open to danger from hackers and malware. Data quality is also at risk because vulnerable communities, especially those who are caught in the crosshairs of current political and social tensions, may distrust the new methodologies.

Accordingly, it is critical for the Census Bureau to bridge the digital divide within self-response systems, including testing software to ensure that the questionnaire operates smoothly and safely on older operating systems and smartphones that hard-to-count populations may be most likely to use as a primary source of internet access. Given the smaller “footprint” the 2020 Census design envisions, the Bureau must also build a field infrastructure that best serves hard-to-count communities. Finally, the Bureau must strike a balance between cybersecurity and confidentiality to protect respondents’ civil and human rights.

Thank you for this opportunity to comment on the 2018 End-to-End Census Test as the Bureau strives to count everyone in the right place, measure enormous demographic shifts, and support the efforts of policymakers to meet the urgent needs of communities. If you have any questions about these comments, please contact Leadership Conference Census Task Force Co-chairs Terry Ao Minnis, Asian Americans Advancing Justice|AAJC, at 202-296-2300 x0127, or Arturo Vargas, NALEO Educational Fund, at 213-747-7606, or Corrine Yu, Managing Policy Director, at 202-466-5670.

Sincerely,



Vanita Gupta  
President & CEO  
The Leadership Conference on Civil and Human Rights



Arturo Vargas  
Executive Director  
NALEO Educational Fund

August 13, 2017  
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A handwritten signature in blue ink, appearing to read "Terry Ao Minnis". The signature is fluid and cursive, with a large initial "T" and "A".

Terry Ao Minnis  
Director of Census and Voting Programs  
Asian Americans Advancing Justice | AAJC