



August 5, 2019

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

Submitted via email to: docpra@doc.gov

RE: Proposed Information Collection; Comment Request; 2020 Census Post Enumeration Survey Person Interview and Person Followup, Docket number USBC-2019-0003

Dear Ms. Jessup,

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, Asian Americans Advancing Justice | AAJC and NALEO Educational Fund, we appreciate this opportunity to provide comments in response to the June 5, 2019 Notice in the [Federal Register](#) on the 2020 Census Post Enumeration Survey Person Interview and Person Followup operations.

The Leadership Conference provides a powerful unified voice for the many constituencies of the coalition: persons of color, women, children, individuals with disabilities, gays and lesbians, older Americans, labor unions, major religious groups, civil libertarians, and human rights organizations. Our coalition views an accurate and fair census, and the collection of useful, objective data about our nation's people, housing, economy, and communities generally, to be among the most important civil rights issues of our day. We have a long record of first-hand experience working in support of previous censuses. For the 2010 Census, we undertook the most comprehensive and extensive effort by a stakeholder organization to promote participation in historically hard-to-count communities and to mobilize local advocates in support of the census by highlighting the civil rights and social justice implications and community benefits of an accurate count.

At the outset, we want to amplify the constitutional requirement for a census as the foundation of a democratic system of governance based on equality of representation. Accurate census data also are essential for the prudent, fair allocation of public resources at all levels of government; development of policies and programs that meet the needs of all communities effectively and efficiently; and as a guide for private sector investment that spurs economic growth and creates jobs. Therefore, we must evaluate the proposed 2020 Census information collection in the context of an overarching goal of increasing the

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likelihood of counting all population groups and all communities equally well. This means we have a stake in understanding to what degree the 2020 Census is fair and accurate, and what populations may have been left out, especially at disproportionately high rates.

The Post Enumeration Survey (PES) is a core component of such coverage measurement estimation, and the methodology for enumerating housing units and households in the PES sample will in large part determine how well the 2020 Census coverage measurement survey identifies people who were not counted, who were counted more than once, or included erroneously or in the wrong place in the 2020 Census. And although the coverage measurement operations are vital to evaluating the quality of the decennial count, the operations are expected to have a minimal impact on the overall cost of the census.

Below we offer recommendations designed to improve the accuracy and reliability of information collected during the PES Person Interviews, which in turn will help ensure that the PES matching process at the core of dual system methodology is based on the best information possible.

Hard-to-Count Populations

The Census Bureau has taken many steps over the decades to improve the accuracy of the enumeration, and we have appreciated the opportunity to be partners in advancing that goal in recent years. We also applaud innovation in all federal data collection activities, which we believe encourages creativity and forward-thinking, as well as wise expenditure of taxpayer dollars, and takes advantage of scientific advancements in survey measurement and ever-evolving technologies.

Nevertheless, the decennial census historically has missed larger proportions of certain population groups, including Hispanics and non-Whites, renters, young children, and men, as well as residents of certain regions and areas counted by different enumeration methodologies, such as Update/Enumerate, while overcounting or counting more accurately other groups, such as non-Hispanic Whites, older people, women, and homeowners. All of these groups, in turn, are themselves diverse and require a more granular understanding of how well and in what ways the census counts them. For example, Black men ages 18 to 49 historically have been missed at some of the highest rates of any demographic cohort. Understanding the possible housing, household, and geographic factors that contribute to the high level of inaccuracy for this population group is critical. Reliable net coverage estimates and components of coverage for hard-to-count populations will contribute substantially to this goal.

Person Interview Sample Size

A robust sample size is essential for determining how demographically and geographically granular and statistically reliable the estimates of coverage will be, as is a sufficient level of cooperation by households in the sample. The proposed sample size for the Person Interview component of the PES is approximately 190,000 housing units. We are concerned that the PES sample size is not sufficiently large enough to produce estimates of acceptable reliability and detail.

As recommended in the UN operational guide for Post Enumeration Surveys, a decision on the appropriate sample size should take into consideration, among other factors, the expected level of non-response (that is, cooperation) rates. A growing culture of fear and distrust of the government may have

an impact on both direct household and proxy cooperation with PES field staff. This may be particularly true among immigrants and people of color, as a result of anti-immigrant policies and rhetoric in the public sphere, including the recent high-profile events surrounding the administration's push to include a citizenship question on the 2020 Census. The upcoming presidential campaigns and election season may cause an increase in overly partisan rhetoric, which could increase fear and distrust of government in many households, thereby making it more difficult for interviewers to secure cooperation from residents.

While these same phenomena could affect census participation, the PES interview process presents unique challenges and has greater methodological implications because: (1) the operation is not well-known and, therefore, could raise more suspicion among households in the sample; and (2) the operation universally requires one or more in-person visits (as opposed to offering, for example, a more "anonymous" online response option as the census itself will offer).

An insufficient sample may not support production of reliable coverage estimates and components of coverage for the range of demographic and housing (tenure) characteristics, by useful units of geography, that the Census Bureau, policymakers, state and local governments, researchers, and other stakeholders need to evaluate census accuracy comprehensively. Such evaluation should be done in ways that shed light on disproportionate outcomes and inform additional evaluations of various census operations, as well as planning for future censuses. Therefore, we support an increase in the Person Interview sample size to help offset possible reductions in cooperation and completed interviews from a household member (as opposed to a proxy) due to the political and social environment in which this operation will take place.

Importance of Trusted Messengers

Trusted messengers in the growing climate of fear and distrust of government will be more important than ever. While we acknowledge this is challenging, given that the PES work is both geographically dispersed and modest in scale, hiring and deploying trusted community members as interviewers should be a priority. Tapping into the Census Bureau's professional field representative network is important to ensure the highest quality interviews, but interviewers must also be knowledgeable about the areas in which they will work, geographically, culturally, and linguistically. This means that it will be critical to assign Census Bureau interviewers to their local communities wherever possible.

We also urge the Census Bureau to implement a waiver process to allow work-eligible legal permanent residents (i.e. green card holders) to apply for interviewer jobs. This would expand the pool of possible interviewers, making it easier to find candidates with relevant cultural and linguistic knowledge.

Additional Demographic Information

The description of the Person Interview does not include sex/gender as part of the demographic information to be collected about each person in sample households. All previous post enumeration surveys conducted in conjunction with a decennial census have collected information on gender and reported net coverage estimates for males and females, cross tabulated by other characteristics. This variable is extremely important, since previous coverage evaluations have shown significant differences in the accuracy of the census for males and females.

Similarly, the Census Bureau has previously reported coverage estimates for owners and renters, cross-tabulated by demographic characteristics. These two factors often are viewed as loose proxies for higher and lower income households. Previous coverage evaluations have shown that renters are missed at higher rates in the census than homeowners, suggesting that future censuses should include activities specifically designed to improve participation among households that rent their living quarters.

We strongly urge the Census Bureau to include sex/gender among the demographic information collected in the Person Interviews and reported as a characteristic for coverage measurement purposes, in keeping with historical practice. Person Interviews should also determine housing tenure—that is, whether the housing unit is owned or rented by the householder or another responsible member of the household.

Timing of Person Interview and Re-interview Operations

We support the proposed earlier time frame for conducting this important component of the 2020 Census coverage measurement program. Starting field visits in June 2020, instead of August, as was the case in 2010, will help improve recall on the part of respondents and improve the reliability of responses because of closer proximity to Census Day. While it is not clear from the *Federal Register* Notice how long the Person Interview operation will last, we urge the Census Bureau to take steps to complete this specific activity within as short a time period as operationally feasible, without sacrificing quality and thoroughness.

Thank you for the opportunity to comment on this key component of the 2020 Census plan and to ensure that the voices of the civil and human rights community continue to be heard as the Census Bureau finalizes methods and operations that it will deploy through the enumeration in 2020. If you have any questions about these comments. If you have any questions about these comments, please contact 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, The Leadership Conference, at 202-466-5670.

Sincerely,



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The Leadership Conference on Civil and Human Rights



Arturo Vargas
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John C. Yang
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