



May 5, 2020

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AAJC

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Dear Chairman Johnson, Ranking Member Peters, Chairwoman Maloney, and Ranking Member Jordan:

On behalf of The Leadership Conference on Civil and Human Rights and its Census Task Force Co-chairs, NALEO Educational Fund and Asian Americans Advancing Justice | AAJC, we write to express our views regarding the U.S. Census Bureau's substantial revisions to its 2020 Census plan. The current public health crisis has made it impossible for the Census Bureau to complete a fair and accurate count of all people living in the United States without significant adjustments. While we acknowledge that the Census Bureau's updated timeline is necessary to accommodate the COVID-19 crisis the nation is experiencing, we believe decisions as significant as the operational and statutory changes proposed by the administration require robust oversight and close review.

Under a traditional census plan, in May, the Census Bureau would be pivoting to the Nonresponse Follow-up operation, the door-to-door enumeration that is essential to fully reach the communities we represent. The self-response operation continues throughout this period, and households can still respond online, by mail, and by phone. However, field operations designed to reach or count people experiencing homelessness, many rural communities and American Indian reservations, transitory households, some group facilities, and college students living off campus are suspended or no longer feasible. We are concerned about the disruption to census operations specifically designed to improve the accuracy of the census in historically undercounted communities, and we will be monitoring census operational shifts closely to make sure the goal of a fair and accurate count can even be achieved.

As a threshold matter, we urge Congress to require more thorough and frequent reports on 2020 Census progress to the authorizing and appropriations committees. Beyond this common-sense intervention for an unprecedented set of circumstances, we believe the following actions are necessary for a complete understanding of the implications of this public health crisis for the 2020 Census. These steps should precede any legislative action to modify the statutory reporting deadlines for 2020 Census data.

We believe Congress must:

1. Evaluate the implications of the Census Bureau's operational adjustments for data quality and accuracy, costs, and feasibility to ensure that the census will include all communities and population groups equitably. For example, counting some communities many months after Census Day raises concerns about consistency of effort and fairness of the final results for harder-to-reach population groups. Spread of coronavirus beyond urban areas could jeopardize plans to resume the Update/Leave

operation in rural communities and on tribal lands, where most households have yet to receive their initial census packets and often lack internet access, putting an accurate enumeration of these populations at risk.

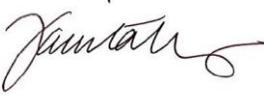
2. Assess the consequences of the administration's proposed extension of the statutory deadlines for reporting apportionment and redistricting data, for the ability of states and localities to carry out the redistricting process fairly and in accordance with existing statutes, constitutional provisions, and the Voting Rights Act.
3. Closely examine the Census Bureau's adjusted operational timeline and advocate for enhancements to address the severe disruption the COVID-19 crisis has caused for successful conduct of the 2020 Census. Those enhancements include (but are not limited to) one or more additional mailings with paper questionnaires to households that have not self-responded; a "pre-NRFU" door tag left at all households in the Nonresponse Follow-up universe, alerting them to the upcoming enumerator visit; targeted "micro-advertising" in low self-response neighborhoods; targeted advertising and outreach materials in additional languages; and increased and expanded Census Questionnaire Assistance capacity to collect telephone responses.
4. Prohibit the administration's directive for the Census Bureau to produce a new block-level file on the citizenship status of the population by voting age, which is time-consuming and does not fulfill any legal or statutory mandates, so as not to divert staff and fiscal resources from processing statutorily required datasets that already face significant delays.

We believe the administration and the Census Bureau must:

5. Brief key lawmakers, fully and frequently, and provide transparency and accountability about the way the Bureau is spending available resources to address the impact of COVID-19 on the 2020 Census. Reports to Congress should include detailed information about the supplies and equipment (PPE) the Census Bureau will make available to its field and office staff as operations proceed.
6. Ensure transparency about the Bureau's plan to resume census field operations, which includes phased reopening of Area Census Offices as health conditions on-the-ground allow starting June 1. The Bureau must keep Congress and the public fully informed about the phased resumption of field operations and contingency plans in areas where health restrictions do not permit restarting these activities.

Thank you for your commitment to a 2020 Census that is fair and accurate for all communities. If you have any questions, please contact Terry Ao Minnis, Asian Americans Advancing Justice | AAJC, at tminnis@advancingjustice-aaajc.org, or Arturo Vargas, NALEO Educational Fund, at avargas@naleo.org, or Corrine Yu, The Leadership Conference, at yu@civilrights.org.

Sincerely,



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



John C. Yang
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Arturo Vargas
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NALEO Educational Fund