



November 15, 2022

Jennifer Reichert
Chief, Decennial Census Management Division
Shannon Wink
Program Analyst, Policy Coordination Office
U.S. Census Bureau
Washington, DC 20233

Submitted via email: DCMD.2030.Research@census.gov and to www.regulations.gov

Re: Docket Number USBC-2022-0004, Soliciting Input or Suggestions on 2030 Census Preliminary Research

Dear Ms. Reichert and Ms. Wink,

On behalf of The Leadership Conference on Civil and Human Rights and The Leadership Conference's Census Task Force co-chairs, we appreciate this opportunity to provide input on preliminary research topics for the operational design of the 2030 Census, as solicited by the Federal Register Notice published by the U.S. Census Bureau on August 17, 2022 (87 FR 50599; Agency/Docket Number 220526-0123).

The Leadership Conference provides a powerful, unified voice for the many constituencies of its coalition: persons of color, women, children, individuals with disabilities, LGBTQ individuals, 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.

The recommendations offered reflect not only The Leadership Conference's priority issue areas in its work to promote a fair and accurate decennial census, but also the broad consensus on the importance of these issues across our diverse coalition, which is largely made up of organizations serving communities and population groups facing persistent census undercounts. Many of our coalition partners are also submitting recommendations focused on issues specific to the communities they serve; our comments also seek to uplift the expertise of our partners when appropriate.

We have organized our recommendations under each of the five topics indicated in the Federal Register Notice, with additional subheadings on suggested research. As discussed below in more detail, the bureau should:

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- Develop strategies to eliminate differential undercounts for racial and ethnic groups by partnering with stakeholders.
- Research methods to improve engagement and advance data inclusion for LGBTQI+ communities.
- Research methods to increase self-response and complete responses by families with young children.
- Research ways to improve the accuracy of group quarters counts through the use of administrative records.
- Research improvements to the Post-Enumeration Survey.
- Research improvements to messaging and tactics to reach historically undercounted communities.
- Research enhancements to language access support.
- Research ways to ensure access for respondents with disabilities.
- Study ways to improve and expand the Mobile Questionnaire Assistance (MQA) concept.

Reaching and Motivating Everyone

In the Census Bureau's efforts to improve outreach and motivate respondents, there should be research dedicated to reversing the historical trend of undercounting communities of color, lower income households, and young children, as well as research dedicated to reaching and engaging other population groups facing barriers to census participation. To better reach and motivate households and individuals in historically undercounted communities to respond to the census, the Census Bureau should conduct research in the following areas:

Develop strategies to eliminate differential undercounts for racial and ethnic groups by partnering with stakeholders.

To reverse the historic trend of undercounting African Americans, Native Americans, Hispanics/Latinos, Asian Americans, and Pacific Islanders, while overcounting non-Hispanic Whites, the Census Bureau should research new ways to cultivate partnerships with a wide range of organizations that are directly connected to these communities. Such organizations, including the advocacy groups submitting these comments, provide a direct link to these undercounted communities and can help the Census Bureau connect with segments of these populations that are particularly challenging to reach. Educational institutions such as historically Black colleges and universities; the Bureau of Indian Education; Tribal Colleges and Universities; and Hispanic, Asian American, Native Hawaiian, and Pacific Islander-serving institutions also represent valuable opportunities for partnership. Similarly, the Census Bureau should develop partnerships with offices administering government programs (such as SNAP, WIC, and EITC) that support undercounted communities, as well as minority-owned and small businesses serving these communities, to help the bureau engage population groups more likely to be missed and encourage census participation.

Build upon existing research around federal race and ethnicity data collection to motivate diverse communities to respond to the census.

The Census Bureau should build upon its extensive existing research around updated race and ethnicity questions that will motivate more people to respond to the census by better reflecting individuals' complex identities and offering more inclusive choices. Based on its research, the bureau should consult with the U.S. Office of Management and Budget on the adoption of the following measures for the collection and tabulation of data on race and ethnicity:

1. Add a new, discrete category for people of Middle Eastern and North African (MENA) descent.
2. Allow a combined Hispanic origin, race, and ethnicity question.
3. Provide guidance to data users on ways to bridge data collected through separate race and Hispanic origin questions, if the Census Bureau and other agencies use a combined question going forward.

The Census Bureau should also develop and promote guidance for respondents on how to answer these questions in ways that accurately represent their identity.

Research methods to improve engagement and advance data inclusion for LGBTQI+ communities.

Collecting data on sexual orientation, gender identity, and variations in sex characteristics (SOGI-SC) in the decennial census will bring visibility to the experiences of LGBTQI+ people, ensure their needs are reflected in government policies, programs, and funding investments, and support data-driven research and evidence-based policymaking to address existing disparities and discrimination. For these reasons, the Census Bureau should:

1. Engage in research and testing to propose ways to measure sexual orientation, gender identity, and variations in sex characteristics for the 2030 Census.

We encourage the Census Bureau to revitalize efforts to research, test, and propose the addition of SOGI-SC measures for the 2030 Census, including working quickly with other federal agencies, as needed, to clarify or update outstanding content requests in light of subsequent scientific and legal developments. We recommend that the bureau utilize evidence based on findings from the Household Pulse Survey and from the recommendations made by the 2022 National Academies of Science, Engineering, and Medicine (NASEM) report to inform their work to research, test, develop, and propose SOGI-SC measures to be used in the 2030 Census. For specific recommendations on this research agenda, see comments submitted to this FRN by our partners at the Movement Advancement Project. We urge the Census Bureau to advance this research agenda in consultation with experts on measuring SOGI-SC data, LGBTQI+ people, and community advocates, as well as federal agencies with expertise in surveying LGBTQI+ populations.

2. Support the public by directly participating in educational outreach and community engagement to encourage responses by LGBTQI+ people, reduce distrust, and improve population coverage. For many LGBTQI+ people, the 2030 Census will be the first time they have been asked about their SOGI-SC by the federal government. Many people will be excited to be counted and to see their full selves reflected in the count of the nation's population. At the same time, many LGBTQI+ people live

in places that still lack explicit nondiscrimination protections and, worse, some live in places where their ability to access vital medical care, to seek best practice medical care for their children, and to discuss LGBTQI+ topics in schools are under attack. For this reason, it will be essential for the Census Bureau to invest in community education and engagement and to work closely alongside trusted LGBTQI+ organizations and spokespeople.

In order to encourage public response to SOGI-SC questions, reduce distrust, and ensure these data are collected, analyzed, maintained, and disseminated with rigorous privacy and confidentiality standards in place, we recommend that the bureau:

- Conduct thorough message testing and engage with LGBTQI+ organizations representing a variety of locations across the country, to develop materials that convey effective messaging through a range of accepted outlets and platforms.
- Clearly communicate and implement robust nondiscrimination protections, privacy, security, and confidentiality standards and restrictions on data sharing that exist particularly for census data, in order to reassure respondents that their data will be protected and not subject to misuse.
- Ensure that during every phase of analysis and dissemination, SOGI-SC data are analyzed, maintained, and shared only with rigorous privacy and confidentiality standards in place and upheld.

Research methods to increase self-response and complete responses by families with young children.

The Census Bureau should analyze differential undercounts for young children in 2020 by cross-tabulating data on young children by other undercounted groups and use this research to inform targeted outreach strategies. The bureau should also strengthen partnership programs with school districts, as well as with organizations and experts focused on children and families. It should also evaluate and develop more effective strategies for embedding census education into school and family service-based programs and activities for children and families.

Technology

Improve research and develop new technology to make online response more user-friendly.

The Census Bureau should use innovative technology to make responding to the census faster and easier for all respondents. The bureau should conduct user-centered design research to develop intuitive and time-saving processes for the self-response portal and research reasons for non-completion and points of disengagement. These findings should inform the development of new tools such as pop-up response guidance embedded within the online form and automatic prompts delivered via email, text, or phone call to encourage completion of the survey if a respondent leaves the online survey unfinished. The bureau should also analyze non-ID response rates through the online portal and research more effective methods to accommodate non-ID responses.

New Data Sources

The Census Bureau should research ways to use a broader range of data sources to promote greater accuracy and fairness in the 2030 Census, while also ensuring the privacy of respondents' personal information and prioritizing self-response as the “gold standard” for census data.

Research ways to more accurately count incarcerated individuals in their home communities.

The bureau should research improvements to its methodology for enumerating incarcerated individuals by more accurately counting them as residents of their home communities rather than at a correctional facility. For example, the Census Bureau could work with the Bureau of Prisons and state departments of corrections to securely share pre-incarceration residency data on incarcerated individuals. These new datasets would increase the accuracy of the census by counting incarcerated individuals in the communities where most will return upon completion of their sentences, instead of in the communities where they are incarcerated but with which they have no interaction, thereby yielding more accurate and fairer population counts for public policy purposes.

Research ways to improve the accuracy of group quarters counts through the use of administrative records.

The bureau should also research ways to improve the accuracy of Group Quarters counts for populations with nontraditional living arrangements, such as college students living on and off campus. The bureau should work with colleges and universities, as well as the administration and Congress (if warranted), to facilitate the sharing of student data with the Census Bureau solely for the purpose of ensuring an accurate count of college students on and, potentially, off campus in the census, while maintaining the strict confidentiality protections in Title 13, U.S.C. There should also be further research on how administrative records can be used to improve the accuracy of the count overall and supplement the data derived from direct responses, particularly for young children and populations with complex living arrangements. This research should also investigate the limitations of administrative data with respect to accuracy and completeness, particularly for communities that are already undercounted, and examine methods to enhance self-response by those communities.

Research improvements to the Post-Enumeration Survey.

The Census Bureau should research improvements to the Post-Enumeration Survey and related methodology for measuring census accuracy, as well as alternative measurements of accuracy, to facilitate production of state and, when feasible, sub-state accuracy estimates by key demographic characteristics, to better understand differential undercounts.

Contacting the Public

The Census Bureau should use targeted messaging strategies and tactics to contact respondents, especially in communities that are historically or at risk of being undercounted in the census.

Research improvements to messaging and tactics to reach historically undercounted communities.

The bureau should partner with stakeholders from the communities they are trying to reach to develop targeted messaging and materials that will not just reach these communities but galvanize them to respond to the census. Messaging should be tailored to different audiences, with a focus on undercounted communities and groups facing barriers to census participation. There should be research done on the best methods for communication when contacting individual communities, for example through community and ethnic media, social media such as Instagram, SMS, TikTok, e-mail, Facebook, public assistance services, and websites of organizations connected to these communities. The bureau should also research strategies to increase census awareness and improve continuity in messaging during intercensal years through community outreach and education campaigns about the American Communities Survey.

Providing Support to the Public

The Census Bureau should evaluate existing support services and research enhancements to improve the accessibility of the census for all respondents, especially individuals with limited English proficiency and individuals with disabilities.

Research enhancements to language access support.

Language access continues to be a significant barrier to census response for many households. In 2020, people could only respond to the census online or by phone in just 14 of the more than 300 languages officially spoken in the United States, and paper forms were available only in English and Spanish. Basic outreach materials and advertising were also limited to these 14 “official” languages, and while sample forms and assistance guides were translated into 59 languages, these were only available online and not well-promoted. Of these 59 languages, Navajo was the only American Indian, Alaska Native, or Pacific Islander language represented.

To improve language access for the 2030 Census, the Census Bureau should utilize local American Community Survey data (rather than state or national data) to research and develop targeted language access enhancements, making response materials available in a greater number of languages to localities with high concentrations of language minorities. To better serve respondents with limited literacy in their primary language and individuals belonging to small language populations for which translated materials are not available, the bureau should work to increase the availability of plain language versions of all its multilingual materials. It should also expand support activities for limited English proficient households, including programs to provide verbal assistance to support respondents with literacy barriers. To ensure the hiring of linguistically and culturally competent partnership and field staff to provide this support, the bureau should set local hiring goals in communities with limited English proficiency. The bureau should begin consultations with community stakeholder organizations on the design and implementation of these initiatives early on, including consultations with refugee-serving organizations that often serve small language populations.

Research ways to ensure access for respondents with disabilities.

The Census Bureau should improve the accessibility of census messages, ads, forms, and other communications for individuals with disabilities. It should ensure widespread access to Braille and large print materials for individuals with vision impairments and ensure that all census forms and informational materials are available through screen reader technology. The bureau should develop census informational materials centering the disability community to explain how data are collected and used and support available to assist respondents with disabilities, and work with disability advocacy groups to distribute these materials. For the online form, the bureau should develop an embedded live chat support service in the form of text or verbal assistance for individuals who need accommodations while filling out the census. It should also continue to provide and promote telephone and paper response options as alternatives to online response. Finally, the bureau should investigate new ways to engage the disability community in conversations around the fairness, accuracy, and accessibility of the 2030 Census, including through partnerships with disability advocacy organizations.

Study ways to improve and expand the Mobile Questionnaire Assistance (MQA) concept.

The Census Bureau should expand staffing and resources for the MQA program to increase the number of mobile assistance sites and research which types of sites are most effective in reaching undercounted communities. Additionally, the bureau should develop a flexible partner-driven MQA system that allows partners to propose MQA settings that match community needs. The bureau should also improve communication to community stakeholders and the public about locations and times for MQA sites to help increase their utilization.

Thank you for your consideration of our views. For any questions regarding these comments, please contact Meeta Anand, senior director for census and data equity at The Leadership Conference on Civil and Human Rights, at anand@civilrights.org, or Amy Vertal, program manager for census and data equity, at vertal@civilrights.org.

Sincerely,

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