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Jennifer Reichert  
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Washington, DC 20233

Submitted via email: [DCMD.2030.Research@census.gov](mailto:DCMD.2030.Research@census.gov) and to [www.regulations.gov](http://www.regulations.gov)

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

Dear Ms. Reichert and Ms. Wink,

[The Leadership Conference Education Fund](#) and [State Voices](#) appreciate this opportunity to provide input on behalf of the States Count Action Network (S-CAN) 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).

S-CAN is a coalition of more than 200 organizations across the country that is implementing state and regional outreach and education initiatives for the decennial census. On September 21, 2022, The Leadership Conference Education Fund and State Voices convened a virtual workshop with approximately 25 core S-CAN members to identify key recommendations for 2030 Census operational design research based on the organizations' experiences planning and conducting field outreach during the 2020 Census. Our comments also reflect recommendations from evaluations of 2020 Census engagement campaigns by [Advocates for Children of NJ](#), [Alaska Counts](#), [Early Childhood Census 2020 Fund](#), [Funders Committee for Civic Participation](#), [Together We Count](#), and [We Count LA](#).

**Reaching and motivating everyone**

Institutional partnerships, communications, and support

We recommend that the Census Bureau develop mechanisms to increase partnerships with trusted national, regional, state, and local organizations who are well-positioned to reach historically undercounted community members. We also recommend that the Census Bureau study methods to research new ways to cultivate and sustain partnerships with civic engagement organizations that educate and mobilize communities throughout the decade. More specifically, the Census Bureau should:



- Formalize partnerships with [Community Action Agencies](#), which provide year-round support to historically undercounted community members through EITC, LIHEAP, and SNAP enrollment, and other services that reach millions of people on a continuous basis.
- Partner with educational institutions and professional educational associations such as the Bureau of Indian Education, Tribal Colleges and Universities, Historically Black Colleges and Universities, and Hispanic, Asian American, Native Hawaiian and Pacific Islander-serving institutions to engage population groups more likely to be missed and encourage census participation.
- Formalize strategic partnerships with corporations and businesses, especially minority-owned small businesses, to invest in and promote the 2030 Census among their staff and customers.
- Maintain and publicize a database of national, state, regional, and local partners to assist with local coordination and minimize redundancies in organizing efforts.

The Census Bureau should also research mechanisms to better streamline communications to state, regional, local government, philanthropic, and community-based agencies. Specifically, the Census Bureau should develop methods to:

- Engage state demographers and the State Data Centers in a more focused effort to assist local and tribal governments in preparing for and participating in research to improve and expand ongoing geographic support programs that engage state, local, and tribal governments throughout the decade to reduce the burden on local governments during the Local Update of Census Addresses (LUCA) operation.
- Streamline communications with counties, cities, and municipalities through partnership channels with the National Association of Counties, National League of Cities, U.S. Conference of Mayors, National Association of Towns and Townships, and other associations representing the interests of local governments.
- Establish strong connections with state/regional organizing and funding tables/coalitions to ensure coordinated efforts and provide a direct channel for communicating state/regional-specific information.

We also recommend that the Census Bureau research improvements to the Partnership Program and Area Census Office operations. The bureau should develop methods to:

- Improve communications of key dates and operational plans to institutional partners.
- Cultivate long-term relationships with local outreach leaders, partners, and organizing tables/coalitions to maximize collaboration around “Get Out the Count” efforts to encourage robust participation in the census.
- Consult with state/regional organizing tables/coalitions on designing localized recruitment, onboarding, and training processes for new census staff to increase capacity and retention and to minimize turnover.

Strategies to improve outreach to historically undercounted groups

The Census Bureau should expand upon existing research on federal data collection to increase census accuracy and motivate more people to respond. In particular, the bureau should study how questions on the 2030 Census can be improved to better reflect individuals' complex identities and offer more inclusive choices, particularly for questions on race and ethnicity and new questions on sexual orientation, gender identity, and sex characteristics (SOGI-SC). This should include building upon existing research around federal race and ethnicity data collection and consulting 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:

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

The Census Bureau should also engage in research and testing to propose measures of sexual orientation, gender identity, and variations in sex characteristics for the 2030 Census. In addition, the bureau should consult with advocacy groups and coalitions to determine appropriate language for newly added questions and categories.

We also urge the Census Bureau to research methods to improve the count of families with young children. The bureau should analyze differential undercounts for young children in 2020 and consult with organizations and experts focused on child and family issues. In addition, the bureau should develop strategies to encourage school districts and schools to adopt the Statistics in Schools curriculum further in advance of the decennial count, to ensure students — and by extension, their families — are more consistently aware of the census. The bureau should also explore ways to embed census education into more programs and activities for children, such as songs about the census, census-related coloring activities, stickers, books, kid-focused ads, and kid-friendly videos.

We recommend that the Census Bureau research methods to improve rural and tribal counting operations. Specifically, the bureau should develop methods to strengthen consultation programs with rural community leaders and tribal governments in any assessment and design of counting operations. The bureau should also develop a joint comprehensive census plan with each tribal nation for the 2030 Census before the initial operational design for the 2030 Census is finalized in 2024. In addition, we urge the bureau to research alternative ways to send census materials to households lacking city-style mailing addresses, such as the inclusion of P.O. boxes for census mailing packets; develop strategies to ensure sufficient local hiring of field staff and enumerators who are familiar with the areas to which they are assigned; and examine the degree to which the reduced number of local census offices in 2020 impacted the bureau's ability to support operations in rural areas and on tribal lands.

The Census Bureau should expand research to inform improved outreach strategies for historically undercounted communities. This should include expanding research into the underlying factors that

contribute to the disproportionate undercount of some populations and the overcount of others, particularly for the most highly undercounted segments of the population by age and race. Moreover, the bureau should present and disseminate research in a way that is accessible to local outreach partners. It would also be useful for the bureau to conduct focus group discussions within historically undercounted communities to better understand how to improve outreach strategies.

## **Technology**

### Online self-response portal

We urge the Census Bureau to explore methods to improve the user interface and experience of the portal to decrease bounce rates and increase completions. Specifically, the bureau should conduct research on the extent and reasons for noncompletion of online responses to inform portal improvements. We recommend that the bureau analyze non-ID response rates and reconfigure operations and the online portal to accommodate non-ID responses more easily and in a more user-friendly manner.

### Telephone response lines

We recommend that the Census Bureau develop strategies to improve call center technology and capacity to receive more callers and minimize caller wait times. We urge the bureau to explore solutions such as:

- Analyzing call center data from the 2020 Census to inform operational and language capacity updates.
- More fully advertising the availability of the telephone response option, including through television and radio, and ensuring sufficient staffing, including in-language assistance for respondents who prefer to complete the questionnaire in a non-English language.
- Urging cellular service companies to provide free minutes covering calls made to the census telephone response lines.

Moreover, the Census Bureau should explore other technological alternatives to the online response portal. We recommend that the bureau research the security and operational viability of offering a response option through encrypted messaging platforms often utilized by limited English proficient communities. The bureau should examine the security, efficiency, and operational viability of using text messaging options for collecting callback requests. In addition, the bureau should consider chatbots such as the one developed by the [State of California](#) to answer frequently asked questions.

### Enumerator devices

The Census Bureau should research and incorporate feedback from 2020 Census enumerators to make improvements to the user interface and experience of the enumerator devices. Specifically, the bureau should develop solutions to:

- Better integrate enumerator tablet devices so that system data are updated in a timely fashion to prevent multiple contacts once a household responds.
- Improve note-taking capacity for enumerators following in-person and proxy visits, to provide better continuity and communication between visits to the same address.

### Operational metrics to inform partner outreach

The Census Bureau should explore ways to make operational metrics more easily accessible to inform partner outreach and last-mile resource investment strategies during field data collection. We urge the bureau to consult with stakeholders about the range and presentation of data most useful for effective outreach and cooperation with enumerators. In addition, the bureau should develop methods to report non-response follow-up completion rates in a more timely manner, and at lower levels of geography.

The Census Bureau should research and invest in developing best-in-class data visualization platforms as a critical tool for outreach partners, funders, policymakers, journalists, and other stakeholders. This should include studying solutions such as:

- Including geographical layers ranging from county/city lines to ZIP codes (used for community-based mail outreach and media buys) and legislative districts (which are often requested by elected officials to mobilize last-mile outreach).
- Looking to models such as the State of California's [Hard-to-Count Map](#) or SwORD platform, or the CUNY [Census 2020 Hard to Count Map](#) for creating a fully integrated, centralized data source for census stakeholders.

### **New data sources**

#### Master Address File (MAF)

The Census Bureau should develop methods to educate and engage community-based stakeholder organizations in the Local Update of Census Addresses (LUCA) operation more effectively. This should include developing best practices to help address listers, as well as state and local LUCA participants. The bureau should research and address the proliferation of nonstandard housing in MAF-verification activities and ensure inclusion of non-city style addresses in rural areas, particularly on tribal lands. In addition, the bureau should research ways to improve and expand ongoing geographic support programs that engage state, local, and tribal governments throughout the decade to reduce the burden on local governments during the LUCA program.

We urge the Census Bureau to evaluate and revise Address Canvassing and other field update processes. The bureau should reconsider the scope of the In-Field Address Canvassing operation to ensure accurate identification of nonstandard housing. In addition, the bureau should develop more effective ways to reconcile duplicate addresses for the same housing unit before and during peak operations to reduce repeat visits by census field staff.

#### Special enumeration operations

The Census Bureau should research methods to improve the processes for counting individuals living in group quarters. We urge the bureau to work with Congress and relevant stakeholders to facilitate the use of administrative records to enumerate college students living in group quarters and to ensure that students living in off-campus housing are counted accurately. The bureau should also evaluate and update

the methodology for applying residence rules to more accurately count incarcerated people as residents of their home address instead of at the facility where they are incarcerated.

We recommend that the Census Bureau research methods to improve the processes of how unsheltered individuals are counted. This should involve extensive consultations with service providers, advocates, and state, local, and tribal governments about ways to improve the process for counting people experiencing homelessness, including the use of administrative records and databases that some localities maintain.

The bureau should also consult with experts and research how best to reach and accurately enumerate housing-insecure individuals and families who are not using the homeless shelter systems or living in unsheltered locations.

#### Additional research

We urge the Census Bureau to continue research on the use of administrative records to supplement direct enumeration. The bureau should explore and develop a robust plan to improve the quality, usability, and privacy protections of administrative records for all population groups and types of households, including working with tribal governments to negotiate access to tribal administrative databases.

The Census Bureau should evaluate and revise the way the Census Bureau presents and explains measurements of accuracy. This should include an examination of methods to elevate components of error, including omissions and duplications, as equally consequential to net under and overcount.

We recommend that the Census Bureau expand research into how census data are used for federal and state resource allocations and disseminate the results more widely to inform outreach campaigns. The bureau should explore developing and maintaining a comprehensive resource cataloging the use of census-derived data for the geographic allocation of federal assistance. In addition, we believe the bureau should invest in research assessing the use of census data by state government agencies in their allocation of state and federal expenditures.

### **Contacting the public**

#### Messaging

We urge the Census Bureau to develop strategies to better collaborate with stakeholders in the communications development process and paid advertisement plan to ensure culturally relevant messaging. This should include exploring methods to collaborate more closely with tribal nations to create culturally relevant messaging, as well as investing in census awareness and improve continuity in messaging during inter-decennial years through community outreach and education campaigns about the American Community Survey.

#### Paid and earned media

The Census Bureau should evaluate and revise media budget allocations to more effectively reach historically undercounted population groups. In addition, the bureau should develop strategies to:

- Expand messaging research and paid advertising programs to better target population groups at higher risk of being missed in the census, like parents of young children, people with disabilities, and LGBTQ+ households.
- Evaluate effectiveness of large contractor paid media services because single national paid-media contractors can fail to target smaller cities and neighborhoods, lack differentiated messaging, and miss key timing.
- Expand the number of covered languages and budget for campaigns targeting communities at higher risk of being undercounted. Ethnic market targeting should be included in the paid advertising budget. The bureau should also increase investment in hyper-targeted local market advertising and in non-TV/digital platforms.

We urge the Census Bureau to evaluate and improve national paid media contracting processes to ensure selected contractors are the best fit for reaching historically undercounted population groups. This should involve developing strategies to work with relevant stakeholders to collectively identify potential media partners who are trusted in communities at risk of being undercounted, as well as making Census Bureau information and funding for media buys more accessible to small ethnic media outlets.

The Census Bureau should explore methods to expand earned media and other messaging strategies. The bureau should develop strategies to maintain media touch points for sharing census data and supporting reporting efforts to ensure that the census remains front-of-mind for reporters and editors. In addition, the bureau should coordinate with stakeholders and social media companies to combat misinformation and disinformation about the census.

### **Providing support to the public**

#### Support to the limited English proficient population

We recommend that the Census Bureau explore ways to embed response guides and answers to frequently asked questions into the online questionnaire itself to support respondents in real time and increase the likelihood of a completed census form. This should include developing solutions to:

- Advise users more clearly that they can also give their responses by phone, with or without an ID number.
- Develop and promote guidance for respondents on how to answer race and ethnicity questions in ways that accurately represent their identity.
- Add more education and outreach messaging with non-political statements of fact on how the census affects communities and how respondent information is protected.
- Add reminders for families to include infants in the count.

The Census Bureau should develop strategies to improve language access for online and paper census forms, telephone assistance, paid advertising, outreach materials, and staffing. To this end, we urge the bureau to research methods to:

- Offer online and paper response options in more of the 59 languages for which 2020 Census sample forms and assistance guides were prepared, as well as in additional Indigenous languages.
- Use local-level (rather than national) ACS language data to target expanded translation of census materials to include more than the 59 languages that were included in the 2020 Census, especially additional Indigenous languages in tribal areas.
- Ensure the availability of plain language materials in non-English languages to better accommodate limited English proficient individuals with lower literacy levels in their primary languages.
- Promote more widely the availability of translated materials and language assistance, including through targeted paid advertising, and more effectively test the quality of translated materials across different geographies.

We urge the bureau to explore ways to improve language assistance programs and available guides. The bureau should develop strategies to partner with stakeholders to develop an assistance program for small language populations with high rates of limited English proficiency, including recent arrivals through the U.S. refugee program. The bureau should also develop and implement, in concert with tribal governments and Indigenous communities, a comprehensive language assistance program for American Indians, Alaska Natives, Native Hawaiians, and Pacific Islanders. In addition, the bureau should increase the availability of multilingual “plain language” census materials to ensure accessibility to individuals with lower levels of formal education.

The Census Bureau should develop strategies to improve field staffing and recruitment processes to hire and retain individuals who can better reach limited English proficient communities. We recommend that the bureau explore methods to:

- Hire bilingual staff through regional census offices who can be deployed to supplement the work of bilingual partnership specialists and enumerators assigned to specific locations.
- Have targets for bilingual hiring that match local needs and seek a permanent waiver for hiring work-authorized bilingual noncitizens to meet language assistance needs in a timely, comprehensive way.
- Improve census taker recruitment process by communicating updates and processes more clearly to applicants.
- Provide greater transparency in staffing goals and gaps so that community advocates can more effectively assist the bureau with recruitment efforts.
- Increase language access for the census taker job application to better recruit census takers with the right language capacity to reach LEP communities.

Support to people with disabilities



It is critical for the Census Bureau to develop a comprehensive strategy to improve the enumeration of people with disabilities. In doing so, the bureau should consult with organizations and other experts to develop a research agenda aimed at making self-response more accessible to people with disabilities. Moreover, the bureau must investigate barriers to participation that might affect the accuracy of the count of this often-overlooked population.

#### Mobile questionnaire assistance

We urge the Census Bureau to study ways to improve and expand the Mobile Questionnaire Assistance (MQA) concept. These could include:

- Placing field staff at community and government centers to provide direct assistance to people willing to self-respond.
- Retaining a flexible partner-driven MQA system that allows partners to propose MQA settings that match community needs.
- Communicating planned locations and times for MQA in advance to local partner organizations to boost use of this pathway to census participation in historically undercounted communities.

The Census Bureau should explore the demand for continuing to make paper forms available in 2030. The bureau should consider increasing the number of paper forms mailed to each nonresponding household, as well as making paper forms available at selected community locations.

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 Education Fund ([anand@civilrights.org](mailto:anand@civilrights.org)) or Elena Langworthy, deputy director of policy at State Voices ([elena@statevoices.org](mailto:elena@statevoices.org)).

Sincerely,

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Senior Director for Census and Data Equity  
The Leadership Conference Education Fund

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Deputy Director of Policy  
State Voices