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January 30, 2015

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

Submitted via e-mail

Re: Proposed Information Collection; Comment Request; 2015 National Content Test
(Document Citation: 79 FR 71377)

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, we appreciate this opportunity to provide comments in response to the Department of Commerce's Request for Public Comment. The Leadership Conference provides a powerful unified voice for the various 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. We are pleased to offer for the record a report from our sister organization, The Leadership Conference Education Fund, "[Race and Ethnicity in the 2020 Census](#)," which examines the potential implications of proposed revisions to the 2020 census race and ethnicity questions for continued, effective implementation, monitoring, and enforcement of civil rights protections.

The Leadership Conference views an accurate and fair census, and the collection of useful, objective data about our nation's people, housing, economy, and communities, 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, and for the 2010 Census, 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 a fair and accurate census by highlighting the civil rights and social justice implications and community benefits. In addition, The Leadership Conference conducts advocacy on various data-related issues, such as sufficient funding resources for the American Community Survey (ACS).

The measurement of race, ethnicity, and national origin in the census, ACS, and other bureau surveys is of particular importance to The Leadership Conference and its members. Generally, we support the collection of detailed data that illuminate the diversity within racial and ethnic groups; these data give public and private sector policymakers the tools necessary to understand and address the disparate needs of all communities. We have followed closely the 2010 Census Alternative Questionnaire Experiment Program, as well as subsequent analysis and research efforts, and want to ensure appropriate and timely



opportunities for The Leadership Conference to review and comment on the development of possible revisions to the race and ethnicity questions. We also are interested in how and when the Bureau will utilize the ACS as a vehicle for testing any proposed revisions to the race and ethnicity questions and other methodological and operational changes.

While we applaud the Census Bureau for recognizing the need to reevaluate race/ethnicity questions at a time of ongoing demographic change, we also want to be sure the census and ACS continue to produce data that are useful in the implementation, enforcement, and monitoring of this nation's civil rights laws.

The Education Fund's report, "[Race and Ethnicity in the 2020 Census](#)," is the culmination of The Leadership Conference and The Education Fund's year-long project to examine the Census Bureau's research and testing program from the perspective of civil rights stakeholders and to ensure that any revisions to the 2020 census race and ethnicity questions continue to yield data that support the advancement of fairness and equity in all facets of American life. The report describes specific uses of census race and ethnicity data for the implementation, monitoring, and enforcement of civil rights laws, regulations, and policies, in a number of important arenas. The report also outlines civil rights stakeholder goals and concerns with respect to the collection and reporting of race and ethnicity data in the next decennial census. It concludes with a set of recommendations for both the Census Bureau and OMB, encompassing suggestions for further research and testing, ways to strengthen the partnerships between these agencies and the civil rights community, and principles to guide final decision-making on this critical aspect of the 2020 census.

We stand ready to work with you to ensure that the voices of the civil and human rights community are heard in this important, ongoing national conversation. If you have any questions about these comments, please contact Corrine Yu, Managing Policy Director, at 202-466-5670 or yu@civilrights.org.

Sincerely,

Wade Henderson
President & CEO

Nancy Zirkin
Executive Vice President