

February 2, 2015

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

Re: Comments on 2015 Census Content Test

Dear Ms. Jessup,

According to the 2010 Census, Asian Americans, Native Americans and other Pacific Islanders (NHPI) are the fastest growing races in America.ⁱ In fact, our multiple-race population has grown faster than our single-race population.ⁱⁱ As of 2010, 15% of Asian Americans are multi-racialⁱⁱⁱ and 56% of Pacific Islanders are multi-racial.ⁱ

Together, we have a stake in ensuring that our numbers are accurately accounted, as they affect our ability to accurately measure and assess the state and the future of Asian & Pacific Islander health, and the state and the future of health equity. To do this, we must be able to conduct comparative analysis that requires the ability to align our health-related numerators, with population denominators. We also have a stake in ensuring that our numbers are accurately and completely accounted for, as doing so affects our civil rights, voting rights, and language rights. A complete and accurate count affects the numbers used for redistricting, which affects the composition of the US Congress and other political jurisdictions, and has the potential to affect how public and private dollars are allocated and/or distributed.

America is changing, and the global context of America's future is changing. Smaller populations want to be counted, and it's important that we conduct research to see how well the 2020 Census can accommodate the dynamics of global relations/change, and other forms of social change. Towards this end, we are pleased that the US Census Bureau is undertaking research associated with the 2015 National Content Test to study how to "re-adjust" the sails, by testing the incorporation of relationship questions, within in-household coverage, new MENA categories, and the combination question for Race & Hispanic origin.

- We support testing the relationship question to include households with same-sex relationships because Asian & NHPI households that meet these new criteria deserve to be counted and tabulated, and exclusion of this category could underestimate the true count of Asian & NHPI same-sex households, and distort counts for the total same sex households for the US population.
- We support testing the within in-household coverage to improve accuracy of household rosters as it will help the Census Bureau achieve a complete and accurate enumeration of Asian & NHPI

households. We know from prior Censuses that many Asian & NHPI households live in large, complex households containing multiple generations and relatively large families. We are also concerned about how to reach, and enumerate, Asian & NHPIs who may be homeless, or living in multiple venues because of divorce, dual citizenship, etc.

- We support further testing that uses different contact strategies to optimize self-response. We support using the internet response option because it is more efficient, cost-effective, and offers the flexibility of using drop-down menus for a detailed list, as well as a fill-in the blank, of Asian & NHPI ethnicities. However, income, educational, and technological disparities may exacerbate a digital divide that exists for some Asian & NHPI more than others, and it is important to ensure equitable access by offering segments of the Asian & NHPI populations who will need access to a paper questionnaire for a number of reasons, including: a lack of reliable and affordable internet access and/or technology; limited technologic proficiency; and concerns about privacy and electronic submission.
- We support the use of technologies and human resources to ensure that all individuals will have equal capacity to complete Census forms. We are concerned that certain persons will need further assistance in completing the Census test/forms, including those with limited vision, persons who are not literate in English or other languages, as well as persons who are limited English proficient. Towards this end, it will be important for the Census to allocate sufficient human and technologic resources to address having culturally-sensitive human surveyors, in-language training videos and in-language verbal recording devices, to ensure a complete and accurate count.
- We support testing the use of non-English materials for respondents who are limited English language proficient. We also support testing non-English materials for cultural competency, as well as sensitivity to sexual orientation.
- We support testing the combined question for Race & Hispanic Origin for the following reasons:
 - o (1) the question format is an equitable approach for obtaining information on all racial and ethnic groups in the US;
 - o (2) persons who are of mixed race/Hispanic origin will be able to embrace their diverse heritage, increasing the accuracy and reliability of results;
 - o (3) placing three separate OMB category checkboxes, one for Asians, one for Middle Easterners, and one for NHPIs, will resonate with each racial population as distinct racial groups, decreasing confusion and subsequent item non-response;
 - o (4) detailed responses of the Asian, Middle Eastern, and NHPI communities will provide disaggregated granular data on diverse populations, while still providing accurate counts of the overall Asian, Middle Eastern, and NHPI populations.

At the same time, we do not want to lose sight of measuring progress, from the past to the future, and for this reason support the continued collection, disaggregation and re-aggregation of data that allows for longitudinal analysis, and for that reason, support the continued collection of ethnicity and race.

We thank the Census Bureau for changing with the changing times, and at the same time, working with due diligence to develop technically accurate “race- and ethnic-bridges” so America can measure progress as it relates to our global past, present and future.

As you move forward with public input, and evidence-based analysis, we want to encourage the Census to make the data from the 2015 Census Test public, and invite the Asian & Pacific Islander Caucus (APIC) to provide future comment and testimony as the 2020 Census instrument is presented to Congress in 2017, 2018, and 2019.

APIC has a 40 year history addressing public health issues affecting APIS in the US and associated jurisdictions in affiliation with the American Public Health Association, the world’s largest and oldest association of public health professionals. In 2014, APIC incorporated to become a think tank and an action tank that analyzes, interprets, advances, and disseminates research and policy solutions that have an enduring impact on the Asian & Pacific Islander health and health equity. APIC collaborates with API communities, and with the American Public Health Association, to advance API health and health equity through information-sharing, practice, research, education, policy and advocacy. We have more than 600 individual and organizational members, and would be pleased to serve as a resource to facilitate engagement, understanding and collaboration, of future dialogues about the Census, to advance America’s global citizenship, and America’s health and economic well-being.

I’d like to recognize all APIC members who contributed to this commentary. As you move forward, if you have any questions, need for additional information, or an invitation to participate in further commentary, please contact me at policy@apicaucus.org, or 215-489-4900.

Sincerely,

Chari Cohen, DrPH(c)
Policy Chair
Asian & Pacific Islander Caucus for Public Health
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ⁱ <http://www.census.gov/prod/cen2010/briefs/c2010br-12.pdf>

ⁱⁱ <http://www.census.gov/newsroom/releases/archives/race/cb12-182.html>

ⁱⁱⁱ <http://www.census.gov/prod/cen2010/briefs/c2010br-11.pdf>