



**National
Urban League**

*Empowering Communities.
Changing Lives.*

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February 2, 2015

Jennifer Jessup
Departmental Paperwork Clearance Officer
Department of Commerce, Room 6616
1401 Constitution Ave N.W
Washington, D.C., 20230

Re: U.S. Census Bureau's Proposed Information Collection, 2015 National Content Test

Dear Ms. Jessup:

We, the undersigned leaders of national civil rights and social advocacy organizations committed to the empowerment of peoples of the African diaspora write in response to the U.S. Census Bureau (Bureau) Federal Register Notice outlining the proposed information collection plan for the 2015 National Content Test (NCT).

As part of the research and development cycle for the 2020 Census, we appreciate the importance of the 2015 NCT in developing a decennial Census questionnaire that allows for the collection of accurate data on the racial and ethnic composition of every American community. The decennial Census—the largest peacetime mobilization operation in the U.S.—is essential in advancing equality of access and opportunity in virtually every social and economic sector. We applaud the Bureau's efforts to create equity throughout the race and ethnic categories and to maximize opportunities to self-identify and self-describe.

The Bureau's Federal Register Notice requests comments on three objectives:

1. To evaluate and compare different census content, including race and Hispanic origin, relationship and within-household coverage.
2. To test different contact strategies for optimizing self-response and
3. To test different options for offering non-English options

1. To evaluate and compare different census content, including race and Hispanic origin, relationship and within-household coverage.

The Bureau's goal to achieve a fair and accurate accounting of our nation's population coincides well with our country's broad demographic shift. Research on new methods for collecting race and ethnicity data in the 2020 Census began during the 2010 Census when the Bureau conducted the *Race and Hispanic Origin Alternative Questionnaire Experiment Program*. In that effort, the Bureau disseminated nearly 500,000 questionnaires, re-interviewed households within their sampling, and conducted focus groups and stakeholder meetings to evaluate alternate variations of questions about race and Hispanic origin.

Some notable findings from their extensive research were:

- that the 2010 census did not treat all race and ethnic groups equally;
- whites and blacks did not have a way to identify in or as a subgroup in the 2010 Census;
- that including Middle Eastern subgroups within the White category was not accurate
- that the combined question yielded higher response rates;
- that the combined question better reflected self-identity;
- that the combined question increased reporting of detailed responses for most groups; and
- that many individuals across communities liked the combined question approach as it created equity throughout the different categories.

The collection of comprehensive race and ethnicity data is central to implementing and evaluating a wide array of civil rights laws and policies such as voting, employment, education, housing, health care, criminal justice and financial and economic security. We believe that the Bureau's objective of improving race and ethnic data will provide for more detailed and accurate information that will enhance implementation of civil rights laws and policies. Therefore, we support the Bureau's ongoing efforts to improve the race and ethnicity questions on the 2020 Census questionnaire. This is in keeping with the U.S. Office of Management and Budget's (OMB) standards, which advise that race and ethnicity are two distinct concepts.

Per the OMB definition, a Black or African American person is one having origins in any of the black racial groups of Africa. Therefore, we are particularly supportive of the testing and evaluation of a combined question that will include a more balanced and equal distribution of examples within each race and ethnic question, *i.e. African American, Jamaican, Nigerian, Ethiopian, Haitian and Ghanaian*. Not only does it create a more balanced and equitable distribution of examples within each racial and ethnic category, but it also allows each individual to report a racial identity as well as a country of origin.

To this end, we also support the testing and addition of a Middle Eastern or North African (MENA) category. This would be the first time in the history of the decennial Census that the diversity of the African diaspora would be assessed. We are quite interested, however, in how the Bureau disaggregates, codes and edits Sub-Saharan African responses to the MENA category. Therefore, we urge the Bureau and OMB to support the use of the combined question, in the 2020 Census.

We also support the Bureau's within-in household coverage tests. With the ever-changing economic realities, we believe that the collection of such data will allow for more precise information about the composition of black households.

2. To test different contact strategies for optimizing self-response

We understand that the Bureau has been mandated by Congress to conduct the 2020 Census in a cost-effective manner that does not exceed the 2010 Census budget. We recognize that this will be an extraordinary undertaking, and applaud the Bureau for its strategy to utilize less costly methods such as web-based collection and distribution of the Census questionnaires. We agree that relative to paper forms Internet based tools allow for much greater functionality and flexibility, particularly in question design. We also support the integration of cutting edge user interfaces, because it will allow for the collection of detailed racial and ethnic data that reflects multiple examples of the African diaspora.

We must note, however, that while there is an advantage of utilizing new technology to curtail costs, we believe that the Bureau must not solely rely on web-based technology. Though more Americans are gaining access to broadband in their homes, recent data from our *State of Black America* (SOBA) 2014

Equality Index and Pew Research Center,¹ find that home broadband adoption rates for Blacks still lag behind those of whites by 12 percentage points.² For certain subgroups within our communities—the elderly, those with lower incomes and limited education—the gaps are even wider.³

Data also shows that while younger, college educated, and higher income Blacks are just as likely as their white counterparts to use the Internet and to have home broadband access, these statistics are less promising as socioeconomic status and educational attainment levels decline.⁴

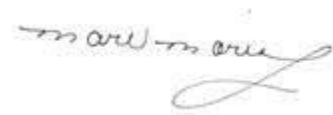
An exclusively web accessible Census can create access barriers to the 2020 Census questionnaire and thus compromise response rates particularly for some members of low-income communities of color. Therefore, while we support utilizing web-based designs, we also support the use of other avenues—both traditional, such as mailed paper questionnaires, enumerators and other non-broadband dependent methods.

3. To test different options for offering non-English options

The African diaspora is an amalgamation of diverse cultures, histories and languages. Therefore, we encourage the Bureau and OMB to support culturally relevant census materials that reflect languages spoken throughout the African diaspora. We believe that by doing so, the Bureau will be able to realize its goal of maximizing the number of non-English and English as a second language speakers that complete the 2020 questionnaires. Once again, this will allow for the collection of vital race and ethnicity data for all of our American communities.

We applaud the Bureau for undertaking this important research. In summary, we support methods to improve with-in household data throughout all populations, including in the Black community. We strongly support the adoption of a combined question that provides equity across all race and ethnic groups for self-identification and self-reporting. Finally, we encourage the Bureau to develop relevant census materials in languages spoken throughout the African diaspora.

Sincerely,



Marc H. Morial
President & CEO
National Urban League



Melanie L. Campbell
President & CEO
National Coalition on
Black Civic Participation



Kim Keenan
President & CEO
Minority Media and
Telecommunications Council

¹ National Urban League, 2014 State of Black America, One Nation Underemployed: Jobs Rebuild America, *Black-White Equality Index*, (April 2014), Accessed at http://iamempowered.com/sites/all/themes/newiae/SOBA/SOBA2014_HTML5/SOBA2014-SinglePgs/index.html. See also Aaron Smith, Pew Research Center, African Americans and Technology Use, A Demographic Portrait, (Jan. 6, 2014), Accessed at <http://www.pewinternet.org/files/2014/01/African-Americans-and-Technology-Use.pdf>.

² *Id.*

³ *Id.*

⁴ *Id.*