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February 2, 2015

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

Re: Request for comments regarding the 2015 National Content Test

Dear Ms. Jessup:

On behalf of the National Association of Latino Elected and Appointed Officials (NALEO) Educational Fund, the leading Latino organization in the area of Census policy development and public education, I would like to take this opportunity to provide comments about the Census Bureau's 2015 National Content Test (NCT). These comments are in response to the proposed information collection published by the Bureau on December 2, 2014 at 79 FR 71377. The NALEO Educational Fund is the nation's leading nonprofit organization that facilitates the full participation of Latinos in the American political process, from citizenship to public service. Our Board members and constituency encompass the nation's more than 6,000 Latino elected and appointed officials, and include Republicans, Democrats and Independents.

The nation's 54 million Latinos are the country's second largest population group, and one of every six of the nation's residents is Latino. Thus, in order for the Census Bureau to compile the most accurate data possible about the U.S. population, it must ensure a full and accurate count of the Latino community. While the Bureau has made progress in reducing the differential undercount of different population groups, the differential undercount of Latinos persists, and was 1.5% in Census 2010.

As the Bureau has recognized, the 2015 NCT is a crucial component of the restructuring process for the 2020 decennial Census. The Bureau's decisions about all aspects of the NCT will have a critical impact on the accuracy of the data compiled on Latinos and the nation's other racial and ethnic population groups, including the detailed data compiled on Latino national origin and sub-groups.

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The NCT will evaluate several potential changes to the Bureau's enumeration approaches: the wording and format of questions on race and Hispanic origin, the optimal targeting of multilingual materials, and the feasibility of various Internet response options. Generally, we believe that any of the foregoing changes adopted by the Bureau must maintain or improve historical Latino response rates and the accuracy of the data collected. The Bureau's future research must also reflect and take into account the diversity within the Latino community, including linguistic and national origin diversity. In order to achieve these goals, the Bureau must work closely with the Latino community in carrying out the 2015 NCT, and obtain the input of Latino stakeholders who have extensive expertise in issues which affect Latino participation in the Census, Latino racial and ethnic identity, and the use of data about Latinos by the public and private sector.

In this letter, we provide recommendations regarding the different components of the NCT as well as other issues affecting the Bureau's activities which have an impact on the enumeration of the Latino community.

I. Proposed Revisions to the Race and Ethnicity questions

Comparability with previous Census data: We support the collection of detailed data that accurately 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. While we commend the Census Bureau for recognizing the need to reevaluate the race and ethnicity questions at a time of ongoing demographic change, we also want to ensure that all Census products provide data that are useful in the implementation, enforcement, and monitoring of this nation's civil rights laws. To that end, any revised format for the race and ethnicity questions must continue to yield, at a minimum, data about all diverse racial and ethnic communities that are compatible with and comparable to data collected during the 2010 and previous decennial Censuses.

Enhanced accuracy of national-origin and sub-group detail: For the Latino community, it is critical that any redesign of these questions does not diminish, and hopefully improves, the quality of data collected about specific Latino national origin and sub-groups. The Bureau must also ensure that testing takes into account and is able to obtain accurate information from Latinos who may choose to report multiple national origin or sub-group identifications.

Testing with Spanish-dominant residents: The Bureau should test all approaches to redesigning the questions on race and ethnicity to ensure that Spanish-dominant residents (which include a significant number of immigrants) understand the questions. This testing should also focus on gathering information about how these respondents interpret these questions, since many of them are not necessarily familiar with the terms used.

Use of clear instructions for hard-to-count communities: The question formats of the NCT should include clear instructions targeted towards hard-to-count communities which effectively communicate to respondents the purpose of the questions and what is precisely being asked. To achieve this goal, we recommend consultation with experts in linguistics and socio-culturally sensitive communications to develop instructions in multiple languages that comport with the dialects used by and reading capabilities of the survey recipients historically least likely to complete the surveys without Census enumerator follow-up.

II. Internet/Technology Response Option

Internet and mobile-phone use by Latinos: We believe that providing a means for electronic response could potentially increase participation rates for some residents while holding down costs, and would be consistent with the growing use of new technology in a variety of governmental operations. However, while we support the idea of adding an Internet response option, we are mindful of disparities in broadband use and the presence of computers in households of different racial/ethnic and socio-economic groups, as well as public concerns about the privacy of electronic data. It is important that efforts to take advantage of new technology for a more efficient and cost-effective Census do not leave traditionally hard-to-count communities behind, and we urge the Bureau not to view the Internet response option as a replacement for paper-based questionnaires, and in-person enumerator follow-up. At the same time, we also note that many Latinos use mobile phone applications, and a mobile phone-based response option could significantly strengthen the Bureau's ability to reach Latino residents. We urge the Bureau to assess the potential of mobile phones as it proceeds to evaluate the use of new technology to improve the quality of public participation in the Census.

Need for multilingual Internet response "push" materials: We are aware that the Bureau recognizes and intends to take advantage of the efficient opportunity that Internet-based response platforms offer for making Census forms and instructions available in multiple languages. However, the Bureau will not be able to effectively utilize this opportunity unless mailings and other contact methods and materials that encourage recipients to respond through the Internet are also multilingual. For example, a monolingual Spanish speaker is not likely to go to the Internet to complete a survey in Spanish in response to receipt of a postcard or letter that encourages him or her to do so but is written in English only. As the Bureau's evaluation of Internet "push" approaches proceeds, we strongly encourage the Bureau to do as much testing in multiple languages of messages, vehicles, and response options as is feasible.

III. Partnership Program and Regional Offices

Sustain the Partnership Program between decennial enumerations: We believe that continued opportunities for a diverse range of census stakeholders to monitor, understand, evaluate, and comment on the Census Bureau's plans for 2020 are vital to ensuring an accurate and fair Census. The Bureau's Partnership Program was an integral component of 2010 Census outreach efforts, and helped engage hard-to-count populations in the enumeration. We urge the Census Bureau to maintain the Partnership Program throughout the decade for several purposes. First, the program will help keep national, state, and local stakeholders fully informed about prospective design changes for the 2020 Census, as well as ongoing efforts to preserve a robust American Community Survey (ACS) and other important demographic and socio-economic surveys. In addition, maintaining and strengthening the network of stakeholders in the program will help ensure their robust and effective participation in the outreach efforts for the 2020 enumeration and other surveys.

Realignment of regional offices and stakeholder outreach: We are also concerned about the impact of the Bureau's realignment of its field office structure on the Bureau's partnerships with local stakeholders. The Bureau's reduction of the number of regional offices from 12 to six has expanded the size of the regions served. As a result, regional offices could experience challenges in reaching and engaging grassroots stakeholders in larger geographic regions encompassing greater cultural and socio-economic diversity. The Census Bureau must address this challenge in a proactive manner by creating plans for Regional Office outreach that take into account the new realignment. These plans should include hiring strategies that promote diversity in field staffing for the Census and other surveys and programs.

IV. Administrative Records

Impact of use of administrative records on enumerating hard-to-count populations: The Census Bureau is conducting research into a broader use of administrative records, both from governmental and private sector sources, to enhance decennial census operations. We understand that administrative records could help the Bureau reduce costs (for example, in updating the Master Address File), and improve certain operations (such as the ability to reach people through e-mail or cell phones). However, we are deeply concerned about the quality, consistency, and accuracy of administrative records, especially with respect to detailed information about race and ethnicity and household relationships. We also believe that information in administrative records about hard-to-count populations may be less complete, accurate and up-to-date than the information about other populations. This results in part from the fact that many residents in hard-to-count populations are extremely mobile, live in non-traditional housing, and have lower incomes than the overall population.

Thus, we are opposed to any attempts to replace the information gathered from door-to-door visits to households that do not respond by mail, Internet, or telephone, with data from administrative records. While we understand that the Bureau has no intention of replacing traditional methods to reach people, we believe that administrative records should only be used if their application does not create disparate results for traditionally hard-to-count communities, and does not diminish the quality or accuracy of data on the Latino population.

Therefore, the Bureau should examine the use of administrative records more thoroughly to evaluate the quality of these records in terms of traditionally undercounted communities. For example, a November 2014 report from the *International Journal of Population Research* indicates that the net undercount of very young Latino children (age 0 – 4) in the 2010 Census was higher than the undercount for any other comparable population group.¹ These children, and other hard-to-count residents, such as undocumented immigrants, are unlikely to appear in the types of administrative records the Bureau proposes to use.

Confidentiality and privacy concerns: We also are mindful that the American public is wary of government access to personal information, and that a successful Census depends, in large part, on public confidence in the absolute confidentiality of the information individuals provide to the Census. Our nation's residents will not participate in the Census if they believe it will violate their privacy. Thus, we are not only concerned about how the Bureau utilizes administrative records, but also how it communicates this use to our country's residents in a manner that does not undermine public trust in the confidentiality of Census information.

We believe the foregoing recommendations will help ensure that the 2020 Census, the ACS, and other Census Bureau surveys collect and produce the most accurate information about the nation's diverse population, and we remain committed to working with the Bureau to achieve this important goal. Should you have any questions, please contact Laura Maristany, the NALEO Educational Fund's Washington, DC office director at 202-360-4182 or at lmарistany@naleo.org. Thank you for your consideration of our views.

Sincerely,



Arturo Vargas
Executive Director
Member, National Advisory Committee on Racial, Ethnic, and Other Populations

CC: Congressional Hispanic Caucus
Congressional Hispanic Conference

¹ William P. O'Hare, "Assessing Net Coverage of Young Children in the 2010 Decennial Census," *International Journal of Population Research*, Vol. 2014, Nov. 2014.