

February 2, 2015

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

Dear Ms. Jessup,

Native Hawaiian and Other Pacific Islander (NHPI) stakeholders are pleased that the U.S. Census Bureau is undertaking the massive, but critical research associated with the 2015 National Content Test (NCT). This project is essential to bringing more equity to the collection of Census data and to providing accurate and reliable information on the diverse and growing US population, including NHPIs. As a distinct Office of Management and Budget (OMB) group, NHPIs represent hard working people who contribute to the vitality of the country and as such, deserve to be accurately reflected in the tabulations of the U.S. Census Bureau. This research will enable us to see ourselves as real people who represent diverse cultures, ethnicities, histories, languages, geographies and demographics that negate the size of our population. As a hard-to-count and hard-to-reach population, we view this effort as our best opportunity to obtain quality information on our population using robust scientific methods and evidence-based research.

We support testing the combined question for Race and Hispanic Origin for the following reasons: 1) the question format represents an equitable approach for obtaining information on all racial and ethnic groups in the US; 2) placing the OMB category checkbox for the NHPI population on a separate line will resonate with Pacific Peoples as a distinct racial group, decreasing confusion and the subsequent item non-response; 3) NHPI persons of mixed race/Hispanic origin will be able to embrace their diverse heritage, increasing the accuracy and reliability of results; and 4) detailed responses of the NHPI communities will provide disaggregated granular data on our diverse population and still provide accurate counts of the overall NHPI population.

We support testing the relationship question to include households with same-sex couples for the following reasons: 1) NHPI households that meet these new criteria deserve to be counted and tabulated; and 2) exclusion of these types of households will underestimate the true count of NHPI same-sex couple households and distort counts for the total same-sex couple 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 the composition of NHPI households. We know from previous censuses that NHPIs live in large complex households containing multiple generations and relatively large families. Obtaining accurate and complete rosters is essential to measuring and understanding the growing variation in US households.

We support further testing that uses different contact strategies to optimize self-response. We agree that the Internet response option is more efficient, cost-effective and offers the flexibility of using drop-down menus for example, detailed list of NHPI ethnicities. However, we believe there are segments of the NHPI population that will need access to a paper questionnaire for a number of reasons, including lack of reliable internet access, weak technology literacy, privacy concerns associated with electronic submission, and for personal comfort and scheduling.

We support testing the use of non-English materials for respondents with Limited English Proficiency (LEP) and strongly recommend that the Census Bureau continue to provide Language Assistance Guides for NHPI populations with LEP. We also recommend that the Census Bureau support the production and dissemination of culturally relevant census promotional materials on the 2020 Census.

Finally, NHPIs are not new to this process. Collectively, we led a successful effort to be recognized and counted as a distinct OMB group and this mandate has greatly enhanced our ability to measure, advocate and promote the needs of all NHPI populations and to be seen as full partners in the growth and success of the United States.

Sincerely,

Sela Panapasa, PhD
University of Michigan

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