

February 2, 2015

VIA email: jjessup@doc.gov

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

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

Dear Ms. Jessup:

The undersigned, representing the Pana'ewa Hawaiian Home Lands Community Association (PHHLCA) a native Hawaiian Community as defined pursuant to the Hawaiian Homes Commission Act (HHCA) 1920 as amended July 7, 1921 who in according to the 2010 census had a resident count of over 2,000 native Hawaiians, who are stakeholders interested in policy and programmatic recommendations regarding the 2020 Decennial Census that will ensure an accurate count of all Asian American, Native Hawaiian and Pacific Islander (NHPI) communities across the country. We appreciate the opportunity to respond to the proposed information collection published by the Census Bureau on December 2, 2014 at 79 Fed. Reg. 71377, which seeks input on the upcoming 2015 National Content Test. We offer the following comments on the topics of the 2015 National Content Test as ways to enhance the quality, utility, and clarity of the information to be collected; and ways to minimize the burden of the collection of information on the respondents, including through the use of automated collection techniques or other forms of information technology.

I. Race and Origin Content

Asian Americans and Native Hawaiian and Pacific Islanders (NHPIs) are among our nation's fastest growing and most diverse racial groups. Often viewed as homogenous, these communities include more than 50 detailed subgroups that can differ dramatically across key social and economic indicators. Without accurate data by detailed subgroup, some of the most disadvantaged in our communities are rendered invisible to policy makers, leaving their critical needs unmet. Through the decennial census, American Community Survey, and other national surveys, the Census Bureau stands as the single most important source of disaggregated data, currently providing data on the size and characteristics of 24 Asian American and 22 NHPI detailed subgroups. Maintaining or improving upon the quality of these detailed data is essential to informed public policy on our communities and the fair allocation of federal, state, and local funding.

Testing thus far suggests some changes being considered would result in decreased detailed race reporting among Asian Americans and NHPIs. As results of the 2015 National

Content Test will help guide the Census Bureau's decision-making, and represents the last major testing opportunity before decisions must be made, it is critical that all steps are taken to address the consistent decrease in detailed race reporting among Asian Americans and NHPIs seen across different tests.

A. Key Principles for 2020 Census

We believe the following overarching principles should guide the Census Bureau as it moves forward with its efforts on determining the race and ethnicity questions for the 2020 census. In many of our conversations and in the design proposals for testing variations in the measure of race and ethnicity, the Census Bureau has noted "balance," "equity," and "symmetry" as central tenets of this effort. However, this approach overlooks two other important, and fundamental, tenets that are centrally important for Census data collection on the race and ethnicity of U.S. persons:

- 1) Ensuring that we do not move backwards from the detailed reporting achieved in the 2010 Census, which should serve as the baseline for effective practice and;
- 2) Ensuring the accuracy of the data collected.

Principle #1: 2010 Census as a Baseline for Effective Practice - We cannot go backwards

Any data collected in future census must meet the standard already achieved in 2010. This is a minimum or floor, with the hopes that future efforts can build on this foundation. We cannot go backwards in terms of the quality of detailed data collected on Asian American and NHPI groups. In order to honor this principle, we recommend the following practices:

- **A maximum number of check boxes should be included, with the number used during the 2010 Census serving as a minimum** - Check boxes capturing detailed race groups improve detailed race reporting and should be utilized for all race groups, regardless of whether or not the race and Hispanic origin questions are combined.;
- **A maximum number of examples should be included, with the number used during the 2010 Census serving as a minimum** - Examples are critical in soliciting detailed race reporting from detailed race groups not represented by check boxes and should also be utilized;
- **NHOPI response options should be clearly identified separate from Asian American response options** – Increasing the visibility of NHOPI response options will help promote their detailed race reporting, which was particularly low during the 2010 Census.

Any further testing should:

- Keep (at a minimum) the practice of having 6 separate check boxes for Asian sub-categories and 3 separate check boxes for Pacific Islander sub-categories.
- "Other Asian" and "Other Pacific Islander" categories should be included, with listings of the same number of examples used in the 2010 Census (at a minimum, 5 for Other Asian American and 2 for Other Pacific Islander).

- Improve upon this baseline, e.g. increasing the number of check boxes and listing of examples, not decreasing these options.

Principle #2: Accuracy

Without accurate data by detailed subgroup, the diversity in the Asian American and NHPI communities means some of the most disadvantaged in our communities are rendered invisible to policy makers, leaving their critical needs unmet. In reviewing proposed research panels, we observed that the proposed formats decreased both the number of separate checkboxes and listings of examples for Asian American and NHPI race groups compared to Census 2010 – practices that have been demonstrated by research to be both ineffective and a threat to accuracy. The most recent AQE testing results¹ confirm that:

- **Removing check boxes used to capture detailed race groups also decreased the amount of detailed race reporting among Asian Americans.** Indeed, these formats yielded the lowest detailed race reporting among Asian Americans of any format tested.
- **Removing a subgroup or national origin from the list of examples for each broad race category reduced reporting for that group.** Testing conducted as part of the 2005 National Census Test² suggests that limiting or removing the list of examples has a negative impact on detailed reporting.

In addition to the recommendations above regarding check boxes and examples, we recommend the following to ensure more accurate data on the Asian American and NHPI communities:

- **Oversampling Asian Americans and NHPs by ethnic group in future testing protocols**, ensuring an adequate sample of both large and small groups across all panels;
- **Providing adequate Asian and Pacific Island language assistance** to ensure meaningful responses from limited-English proficient Asian Americans and NHPs and to ensure results are not biased by English-fluent respondents.

B. Question Format

1. Separate race and origin questions

We support the continued testing of the separate race and origin questions. This format continues to provide the best detailed reporting on Asian American, NH and PI groups and is our preferred method of data collection on race and ethnicity so long as the detailed reporting remains higher with this format. Preservation of the NH checkbox (stand-alone) is consistent with Census' 2000 and 2010.

2. Combined question with checkboxes and write-ins on same screen

¹ U.S. Census Bureau. "2010 Census Race and Hispanic Origin Alternative Questionnaire Experiment." http://www.census.gov/2010census/pdf/2010_Census_Race_HO_AQE.pdf

² Nicholas, Alberti, 2006. "2005 National Census Test: Analysis of the Race and Ethnicity Questions." [Http://www.census.gov.edgekey.net/cac/race_ethnic_advisory_committees/docs/2006_Nov_results_3_2005_test.pdf](http://www.census.gov.edgekey.net/cac/race_ethnic_advisory_committees/docs/2006_Nov_results_3_2005_test.pdf)

Because the Census Bureau is not planning to test a combined question that provides specific group checkboxes for Asian Americans and NHPIs in its paper version, we are concerned that by testing and adopting these design practices, the Census Bureau is introducing new barriers for Asian American populations that did not exist before that will certainly harm the accuracy of the data being collected. Additionally, the manner in which data is collected for both large and small groups must address the accuracy needs of both. Given the historical opportunity that the 2020 Census presents to accurately capture America's changing racial and ethnic demographics – we cannot waste time or resources in re-testing bad designs and creating new barriers to accuracy in detailed reporting.

Thus, we are concerned with potential biases that may be introduced when check-boxes for detailed subgroups are only offered on the internet-based version of the Census form (Gonzalez 2014; Collins et al. 2014; Choi and DiNitto 2013). Even in recent years, as access to technology has increased dramatically, there are still barriers to access for the elderly and low-income people.³ Understanding the effects of this divide is critical given that Census data is used to ensure political representation as well as healthcare services, in-language job training centers, and senior care centers (US Bureau of the Census 2010).⁴ Although internet-surveys are increasingly popular, response rates tend to be lower using this method than traditional survey methods, potentially biasing results (Fan and Yan 2010; Shih and Fan 2008).⁵ Extrapolating from past research, we can assume that those who are elderly, low-income and less English-language proficient will be least likely to access the internet-based survey. These are the very populations within the Asian American and NHPI communities that we hope would have the option to fill out a detailed subgroup checkbox, but that will be more likely to access a paper version of the Census form (which will not include the detailed subgroup check-box option).

NH colleagues fear that if the data is collected by aggregated race identifiers, then data will be published and reported in the same manner, by example of collection. By reporting aggregated NHPI data, it further marginalizes all the detailed race populations covered within this race identifier. NH and PI health, education and welfare needs are dissimilar by reason of political relationship and different historical experience with the U.S. federal government. Disaggregated collection and reporting is the only way needs can be addressed for these populations.

³ Gonzales, Amy L. "Health benefits and barriers to cell phone use in low-income urban US neighborhoods: Indications of technology maintenance." *Mobile Media & Communication* 2.3 (2014): 233-248; Collins, Sarah A., et al. "Digital divide and information needs for improving family support among the poor and underserved." *Health informatics journal*(2014): 1460458214536065; Choi, Namkee G., and Diana M. DiNitto. "The digital divide among low-income homebound older adults: Internet use patterns, eHealth literacy, and attitudes toward computer/Internet use." *Journal of medical Internet research* 15.5 (2013).

⁴ <http://www.census.gov/2010census/language/english.php>

⁵ Fan, Weimiao, and Zheng Yan. "Factors affecting response rates of the web survey: A systematic review." *Computers in Human Behavior* 26.2 (2010): 132-139. Shih, Tse-Hua and Xitao Fan. "Comparing response rates in email and paper surveys: A meta-analysis." *Educational Research Review* 4.1 (2009): 26-40.

We encourage you to include the same version of the Census questions on race on both the paper and internet versions of the survey so that any differences in the likelihood of providing detailed subgroup information can be properly attributed (i.e. to question format or to form medium). With regard to these concerns, we make the following recommendations:

- 1) Collect data on which AANHPI subgroups are the least likely to fill out the Census form on the internet (refusal rates by subgroup)
- 2) Collect data on whether refusals vary by age and English-language proficiency; if these data are available, provide information to the public about refusal rates by English-language proficiency and ethnic subgroups
3. Preserve the stand-alone NH checkbox as presented in Census 2000 and 2010 paper versions.

A significant proportion of AANHPIs are not English-language proficient and their participation in the testing will be reduced by any design that does not include Asian languages. We encourage you to make every effort to include outreach and information related to the September testing in-language and request that you share your plan for outreach and how the Census will collect and record data on refusals/non-respondents. Finally, we ask that you share your plan for recruiting Native Hawaiian/Pacific Islanders into the September 2015 tests. Without their inclusion, it is impossible to understand how changes to the Census will affect these smaller, often non-English proficient, groups.

3. Combined question with checkboxes and write-ins on separate screens (Internet-only)

It will be important to provide maximum number of examples, with the number used during the 2010 Census serving as a minimum. Examples are critical in soliciting detailed race reporting from detailed race groups. The checkboxes and examples utilized in the 2010 Census should be offered on the first screen and subsequent screens for Asian Americans and NHPIs.⁶

4. Combined question branching with detailed checkbox screens (Internet-only)

A maximum number of check boxes should be included in the branching detailed checkbox screens, with the number used during the 2010 Census serving as a minimum. A maximum number of examples should be included for the write-in option, with the number used during the 2010 Census serving as a minimum.

C. Race Response Categories

We support the testing of a separate MENA category.

⁶ Additionally, different forms could also lead to an increase in scams, such as the one detailed in “Avoid possible scams: U.S. Census Bureau will not threaten jail time” (http://dailyjournalonline.com/news/local/scams/avoid-possible-scams-u-s-census-bureau-will-not-threaten/article_82244a86-fc8e-5383-891b-4ea9d178e033.html). This will particularly be the case in vulnerable communities who are low-income, low literate, and LEP.

II. Coverage Content (Internet Only)

Efforts to test ways to improve accurate within-household coverage are important as our nation becomes more and more complex. As the Census Bureau itself notes, the household structure has been diversifying in this country as a result of demographic trends such as: increases in immigration rates and the proportion of the population that is foreign born; changing migration streams now coming predominantly from Asia and Latin America, rather than from Europe; increases in cohabitation and blended families due to more divorces and remarriages; increases in the proportions of co-habitor households with children; and dramatic increases in grandparent-maintained households and non-relative households.⁷ It will be important to ensure we have an accurate count of each household. At the same time, it is important to note that some of the factors that may make a household more complex will mean that the household is less likely to have access to the internet, such as a poorer household or a more heavily-immigrant, limited English-proficient household. To that extent, efforts to test coverage content through other means beyond the internet will be important to explore.

III. Optimizing Self Response

We believe the focus of optimizing self-response should be about optimizing the self-response of hard to count populations. As noted in the notice, the Census Bureau has found depressed self response rates among certain respondents/areas with lower Internet usage. This testing is important to ensure that our communities are properly engaged in this effort. The Census Bureau should not just rely on internet access by traditional broadband means but should develop a strong mobile platform for response to help address disparities in broadband use between racial/ethnic and socio-economic groups. The Census Bureau should also study the results of this testing across different racial, ethnic and subgroup groupings as well as by owner versus renter and by age

IV. Language

We are concerned that the notice does not detail the “additional options for non-English speakers to complete the questionnaires.” There are more than 800 spoken Asian languages and dialects. According to the 2013 ACS 5-year estimates, over seventy-five percent of Asians speak a language other than English at home and nearly 1 out of 3 are limited English-proficient (LEP) – that is, speak English “less than very well”, creating quite a challenge in information dissemination efforts. In addition, older generation immigrants have a different adaptation rate when it comes to speaking/understanding the English language.

Without more detail we can only assume that the Census Bureau's plans to provide language assistance to the many limited-English people that need help filling out their forms outside of Spanish is not fully developed. Lack of English fluency is a real barrier in getting many limited English proficient persons to fill out their surveys. The Census Bureau's own focus group research leading into the last census found that Asian Americans believed that lack of in-language questionnaires and lack of English-language fluency were among the major barriers to having greater participation in the census among the Asian American communities.

⁷ <https://www.census.gov/pred/www/rpts/Complex%20Households%20Final%20Report.pdf>

Similar to the Census Bureau's efforts to include in-language messages in the 2010 Census Advance Letter, the Census Bureau should test including in-language messaging to optimize self-responses in additional Asian languages. The Census Bureau should target language minority communities not just by the size of Limited English Proficient community but also for those groups that have the highest LEP rates and high levels of "linguistically isolated" households, which may represented smaller groups but ones with huge needs. The Census Bureau must also ensure that its translations are of high quality, easily understood in language, and do not inadvertently offend the language community. The Census Bureau should establish and share a systematic process for high quality and accurate translations for both questionnaires (and the subsequent communications campaign) that includes identifying and utilizing appropriate partners. Messaging developed must be easily translated into other languages and the Census Bureau should engage appropriate partners through its partnership program to review messaging for efficacy, including cultural appropriateness.

V. Conclusion

We hope these comments are helpful to the Census Bureau as it finalizes its plans for the 2015 Content Test. We are happy to discuss any of these topics in greater detail and appreciate the opportunity to comment in the first instance. Please feel free to contact us at (808) 315-2141 if you have any further questions.

Sincerely,

William H. "Bill" Brown, President PPHLCA