



**Asian Americans Advancing Justice | AAJC Comments  
To Department of Commerce Federal Register Notices**

**Re: the U.S. Census Bureau  
(80 FR 29609 and 80 FR 30655)**

June 17, 2015

Asian Americans Advancing Justice | AAJC (Advancing Justice | AAJC) is a national non-profit, non-partisan organization founded in 1991. Advancing Justice | AAJC considers the census, including the American Community Survey (ACS), to be the backbone to its mission to advance the human and civil rights of Asian Americans, and build and promote a fair and equitable society for all. Advancing Justice has maintained a permanent census program monitoring census policy, educating policy makers, and conducting community outreach and education to encourage participation in the surveys conducted by the Census Bureau. We appreciate the opportunity to respond to the submissions for OMB Review on the 2015 National Content Test and the American Community Survey.

***80 Federal Register 29609  
Submission for OMB Review; Comment Request – 2015 National Content Test***

Advancing Justice | AAJC, in conjunction with other Asian American and Pacific Islander leaders, submitted comments to the initial request for comments regarding the 2015 National Content Test. We appreciate the efforts the Census Bureau made to be responsive to public comments by ensuring that the 2015 NCT offered a paper-based question design that included multiple-detailed checkboxes for all groups (Combined Question with Major Checkboxes, Detailed Checkboxes, and Write-Ins (Paper)). This was one of the requests made in the comments submitted from the many Asian American organizations and academics. As mentioned in our comments, we were concerned with potential biases that may have been introduced when check-boxes for detailed subgroups were only offered on the Internet-based version of the Census form. Although Internet surveys are increasingly popular, response rates tend to be lower using this method than traditional survey methods, potentially biasing results. Providing multiple-detailed checkbox options for both the online questionnaire and the paper questionnaire will allow us to make the proper comparisons and analysis when the research results are shared.

However, we have similar concerns about the current plans to test "Coverage Content" only through the Internet. As described in the *Federal Register* notice, the Census Bureau plans to test methods to improve within-household coverage, most notably by changing the approach to determining whether the respondent has accurately listed all residents of the household in the roster (i.e. "Rules Based" approach versus the "Question Based" approach). This testing is important to developing the best ways to ensure that everyone who should be included, is actually included, including those most likely to be overlooked (e.g. babies and

young children; non-relatives with no other usual residence). Unfortunately, the Census Bureau is only planning to test the different approaches for Internet response and not testing the new approach via the paper questionnaire. This runs the risk of providing a skewed response to these approaches. One source of within-household misses is "large households" - that is, those with more than 6 people. And those households are more likely to be lower income, as well as less likely to be English language proficient, and, therefore, less likely to have Internet access at home. In other words, the very households most vulnerable to within-household misses are LESS likely to respond via Internet. Thus, the results of the 2015 NCT will not actually address how to best capture these within-household misses. This is a missed opportunity to improve the accuracy of the census and we urge a paper-version testing of the new approach.

**80 Federal Register 30655**

***Submission for OMB Review; Comment Request – American Community Survey***

Advancing Justice | AAJC considers a fair and accurate census and comprehensive ACS among the most significant civil rights issues facing the country today. Our wide-ranging efforts to promote civic engagement, forge strong and safe communities and create an inclusive society are guided significantly by objective, inclusive data on America's diverse communities and populations. We appreciate the importance of fact-based analyses for identifying disparate access and outcomes and devising effective solutions. To that end, we offer the following comments regarding a) the use of administrative records as it relates to the ACS, and b) changes in 2016 ACS content resulting from cognitive testing on computer usage and internet questions.

- Administrative Records

While we recognize and appreciate that the Census Bureau is working to address congressional concerns about the scope of the ACS and to reduce the burden on respondents, any such efforts must ensure that the quality of data for our community, which is already barely adequately captured by the ACS, and others similarly situated, will not be disproportionately compromised. The use of administrative records is an area where potential harm can be done if the proper precautions are not taken.

The *Federal Register* notice is not clear on how the Census Bureau is planning to potentially utilize administrative records. The following two statements in the notice raise concerns for our community.

- “The Census Bureau is conducting groundbreaking work aimed at understanding the extent to which existing government data can reduced redundancy and improve efficiency. The tests we are conducting in the next two years will tell us whether existing government records can provide substitute data for households ***that have not responded to the ACS.***” (emphasis added) (p. 30655)
- “We are also conducting research on substituting the direct collection of information with the use of information already provided to the government. It is possible that the Census Bureau could use administrative records from federal ***and commercial***



*sources* in lieu of asking particular questions on the ACS.” (emphasis added) (p. 30658)

There is a lack of standardization across administrative databases on how race and ethnicity is reported and collected that could potentially leave a large portion of our community being missed in these surveys through the use of administrative data. Particularly as it relates to detailed data being collected, Asian Americans run the risk of missing out on critical detailed data if there is an overreliance on administrative data. We are also particularly concerned about the potential use of commercial sources for data. Commercial data is of greatly lower quality than governmental data with respect to the availability of consistent, detailed data on our community. This means that any design that relies solely, or even mainly, on administrative records in lieu of in-person non-response follow-up, as well as the use of commercial data except for in the most limited of ways, is highly problematic, especially as the ACS provides our communities with the rich characteristic data by detailed groups.

- Changes in 2016 ACS Content Resulting From Cognitive Testing on Computer Usage and Internet Questions

While we understand the need for flexibility in reviewing and possibly revising questions on the ACS, given rapid demographic, social, and economic changes in our society, the Census Bureau must continue to ensure that the review process is transparent; provides adequate opportunity for external stakeholders to review and provide feedback on proposed revisions; and ensures the comparability and consistency of data over time, to support robust research and analysis and to guide prudent policy development. For example, the *Federal Register* notice suggests that the Census Bureau will field revised questions on computer usage and Internet access starting with the 2016 ACS, but stakeholders have not seen the proposed new versions of the questions. We hope that the Census Bureau will not only share the proposed new questions on computer and internet usage, but also report on the progress of its pilot program in a timely way that allows for additional feedback from stakeholders.

### *Conclusion*

We appreciate the opportunity to provide comments on both the 2015 National Content Test and the American Community Survey. Please feel free to contact me at [tminnis@advancingjustice-aajc.org](mailto:tminnis@advancingjustice-aajc.org) or (202) 296-2300 x127 if you have any further questions.

Sincerely,



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Asian Americans Advancing Justice | AAJC

