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October 5, 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 2016 Census 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 2016 Census Test (hereinafter the "2016 Test"). These comments are in response to the proposed information collection published by the Bureau on August 4, 2015, at 80 FR 46239. 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 55 million Latinos are the country's second largest population group, and more than 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 2016 Test is a crucial component of the restructuring process for the 2020 decennial Census. The Bureau's decisions about all aspects of the 2016 Test 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. The 2016 Test will evaluate several potential changes to the Bureau's enumeration approaches, including: the use of a strategy intended to optimize self-response by encouraging respondents to complete the enumeration questionnaire online; the use of a combined question on race and Hispanic origin; refinement of the Bureau's support for respondents who are not yet fully fluent in English; the use of administrative records and third party data to reduce the challenges involved in enumerating households that do not initially respond to the questionnaire ("Nonresponse Followup" or "NRFU"); and other potential technological and operational enhancements.

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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. To achieve these goals, the Bureau must work closely with the Latino community in carrying out the 2016 Test, 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 several different components of the 2016 Test as well as other issues affecting the Bureau's activities which have an impact on the enumeration of the Latino community.

I. 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. Thus, we are looking forward to the 2016 Test's evaluation of the impact of the Internet response option on self-response rates.

However, while we support the idea of utilizing 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. At the same time, we also note that many Latinos use mobile phone applications, and a mobile phone-based response could significantly strengthen the Bureau's ability to reach Latino residents. In light of the foregoing, we urge the Bureau to assess several issues as it evaluates the Internet response option in the 2016 Test:

- The extent to which self-response rates overall vary between Latinos based on a wide range of demographic characteristics, including geography, age, and national origin and sub-group.
- The extent to which Latinos respond using computers compared to mobile phones, and the demographic characteristics of those who use different modes of response.
- The extent to which heads of households receive assistance from other household members in utilizing the different technological response modes. As is the case with other population groups, Latino youth are generally more comfortable with new technology than older Latinos, and it would be useful to understand the extent to which older household members obtain assistance from younger ones in completing the questionnaire through the Internet.

In addition, we recommend that the Bureau explore the experiences of Latinos with different modes of Internet response in the focus groups that are part of the 2016 Test. The focus groups should examine whether Latinos found the questionnaire and the modes of response to be accessible and "user-friendly." The groups should also examine whether the modes of response elicited any concerns about the privacy or confidentiality of the data provided.

Finally, as the Bureau looks beyond the 2016 Test, it is important that efforts to take advantage of new technology for a more efficient and cost-effective Census do not leave Latinos and other traditionally harder-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.

Need for multilingual Internet response contact strategies and materials: We understand that the 2016 Test will examine updated and modernized contact strategies to encourage self-response, including text communication and postcard reminders. In addition, the Test will explore the refinement of the Bureau's non-English language support, and the inclusion of non-English language materials in mailings and web addresses and other contact modes. We commend the Bureau for its recognition of the importance of refining its support for and communication with Latinos who are not yet fully fluent in English, because these Latinos need specialized strategies to promote their self-response. With respect to the contact strategies, we strongly encourage the Bureau to do as much testing in multiple languages of messages, vehicles, and response options as is feasible. With respect to telephone support, we recommend that the Bureau include a mechanism to evaluate customer satisfaction with the bilingual assistance the Bureau provides.

Evaluation of Strategies to Deliver Paper Questionnaires: The 2016 Test will include an evaluation of strategies to deliver paper questionnaires to households that cannot or do not respond using the Internet. This evaluation should include a thorough examination of the demographic characteristics of those who do not use the Internet response option including Hispanic national and sub-group origin, linguistic abilities, and geographic location.

II. Proposed Revisions to the Race and Ethnicity questions

Comparability with previous Census data: The 2016 Test will test a combined question on race and ethnicity, building on its evaluation from the 2015 National Contest Test and the 2010 Race and Hispanic Origin Alternative Questionnaire Experiment. We continue to 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, we emphasize that 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 the combined race and ethnicity question to ensure that Spanish-dominant residents (which include a significant number of immigrants) understand the questions. This testing should also gather information about how these respondents interpret these questions, since many of them are not necessarily familiar with the terms used. The focus groups conducted by the Bureau should explore these issues with participants.

Use of clear instructions for harder-to-count communities: The question formats of the 2016 Test should include clear instructions targeted towards harder-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. The 2016 Test should also examine how different Internet response modes affect the ability to convey clear instructions and information about the combined question formats.

III. Administrative Records and NRFU

Impact of use of administrative records on enumerating hard-to-count populations: A key component of the 2016 Test will involve the Bureau's research into the broader use of administrative records, both from governmental and private sector sources, to enhance NRFU. We understand that the Bureau intends to evaluate the use of administrative records to identify vacant housing units and to assist in determining the occupancy status of housing units for enumeration after a certain number of NRFU contact attempts. We also recognize that the use of administrative records might help the Bureau reduce costs for NRFU operations. However, we are deeply concerned about the quality, consistency, and accuracy of administrative records, especially with respect to detailed information about race, ethnicity and household relationships. We also believe that information in administrative records about harder-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 harder-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, primarily with data from administrative records. 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.

We also recognize that the 2016 Test will include quality evaluations of the administrative records and review of the procedures by which they are produced. This evaluation should examine the extent to which race and ethnicity information are contained in administrative records, and how that information is obtained. The evaluation should also encompass a more

thorough examination of the quality of these records with respect to 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 harder-to-count residents, such as undocumented immigrants, are unlikely to appear in the types of administrative records the Bureau proposes to use.

IV. NRFU Technological Improvements and Operational Procedures

The 2016 Test will examine several technological improvements and operational procedures for conducting NRFU. In light of the 2016 Test's emphasis on the Internet response option, traditionally harder-to-count populations may be even more likely to require NRFU than they would in a paper-based enumeration, because they lack Internet access or the skills or information needed to navigate the online questionnaire. Thus, in general, we urge the Bureau to examine the overall effectiveness of the 2016 Test's NRFU technological improvements and operational approaches in reaching and improving the quality of data collected on harder-to-count populations.

Hiring and Deployment of Field Enumerators: The 2016 Test will evaluate several operational approaches that affect the hiring and deployment of field enumerators. These include utilization of approaches which could result in the deployment of a smaller field workforce and the use of enumerator-provided mobile devices by field employees. We recommend that the Bureau ensure that the field workforce for the 2016 Test reflect the racial, ethnic and linguistic diversity of the sites in which the Test is being conducted, and that field employees have the language skills and cultural competency needed to reach harder-to-count populations.

It is particularly important that the Bureau hire diverse staff appropriate for the sites of the 2016 Test in light of its intent to evaluate the efficacy of deploying a smaller workforce in NRFU. In Harris County, this is also crucial because of the serious challenges that arose during Census 2010 in the Rio Grande Valley and *colonias* area as a result of miscommunication between the Bureau's regional office and local leaders regarding the enumeration method that would be used. While ultimately, the Bureau and local, regional and national partners came together to implement a strategy to address the challenges that arose, one issue that emerged during these efforts was the lack of bilingual field staff assigned to work with or collect data from limited-English proficiency residents, including staff who possessed the requisite knowledge and culture of the immigrant community and families in the area. The 2016 Test provides an opportunity to evaluate strategies to hire and deploy NRFU employees in Texas who can effectively reach Latino residents in Harris County.

Additionally, in Los Angeles County, the hiring of staff with the appropriate linguistic and cultural competency skills is also critical for evaluating the NRFU strategy in the Asian

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.

American community, because of the relatively large population of foreign-born Asian residents in the part of the county where the Test will be conducted. Finally, in both sites, the Bureau should compare the usability of enumerator-provided mobile devices and the related software applications by diverse employees with the usability of Census-owned devices.

V. Focus Groups

As part of the 2016 Test, the Bureau will conduct focus groups with various categories of respondents and non-respondents. These focus groups will examine several issues that are extremely critical for ensuring an accurate account of the Latino community. The groups will examine participant opinions about the use of administrative records, general concerns with government collection, cyber security and protection of confidential data. Because a successful Census depends, in large part, on public trust in the absolute confidentiality of the information individuals provide to the Census, we commend the Bureau for examining confidentiality and privacy concerns in the focus groups. In order to obtain information that will enhance the Latino community's trust in the new approaches that will be utilized in the 2020 Census, the Bureau must ensure that the 2016 Test focus groups held with Latino participants reflect the diversity of the Latino communities in the respective test sites. The composition of these groups should take into account such demographic characteristics as age, national and sub-origin group, nativity and linguistic preferences. At the minimum, the Bureau should conduct one focus group each in both sites with English-dominant Latinos and one with Spanish-dominant Latinos.

As noted above, it is also important that the focus groups held with Latino participants thoroughly examine their experiences with Internet self-response option, including such issues as the choice of devices used to complete the questionnaire, the readability and accessibility of the online questionnaire (including reactions to the combined race and ethnicity question), and the extent to which respondents obtained assistance from family members in completing the questionnaire. If participants chose to respond using the paper questionnaire, or did not respond at all, the focus groups should examine any challenges presented by the Internet response option.

VI. Regional Offices and Partnership Program

We believe the 2016 Test offers the Bureau an opportunity to help assess the impact of its 2012 realignment of its regional office structure on its partnerships with local stakeholders, particularly in the Harris County test site. The Bureau's reduction of the number of regional offices from 12 to six has expanded the size of the regions served. In addition, as a result of the realignment, the Bureau closed its Dallas regional office and transferred its responsibilities to Denver, which now serves Texas and several other Southwestern and Great Plains states. The 2016 Test should examine how the realignment affects the Denver regional's office ability to reach and engage stakeholders in Harris County.

It is particularly critical that the 2016 Test focus on the ability of the Bureau to reach and engage local partner organizations and stakeholders in Texas. As noted above, during Census 2010, serious challenges arose in the Rio Grande Valley and *colonias* area because of

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miscommunication between the Bureau's regional office and local leaders regarding the enumeration method that would be used; these problems made local leaders less confident in the Bureau's partnership capabilities. The 2016 Test will provide an opportunity for the Bureau to re-evaluate its partnership efforts in Texas, and to specifically examine the Denver regional's office relationship with local partners. The evaluation will also help the Bureau design and implement plans in preparation for the 2020 Census that take into account how the realignment will affect outreach by all regional offices.

Similarly, the Bureau should use its experiences with engaging local partners and stakeholders in the Los Angeles and Harris County 2016 Test sites to inform and strengthen its on-going partnership efforts as it prepares for the 2020 Census. The Bureau's Partnership Program was an integral component of 2010 Census outreach efforts, and helped engage harder-to-count populations in the enumeration. We continue to urge the Census Bureau to maintain and strengthen the Partnership Program in preparation for the 2020 Census 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.

We believe the foregoing recommendations will help the 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,

A handwritten signature in black ink, appearing to read 'Arturo Vargas', with a stylized flourish at the end.

Arturo Vargas

Executive Director

Member, National Advisory Committee on Racial, Ethnic, and Other Populations

CC: Congressional Hispanic Caucus
Congressional Hispanic Conference