

TO:

Sheleen Dumas  
Department PRA Clearance Officer  
Office of the Chief Information Officer  
Department of Commerce

FROM:

Corinna Turbes, Policy Manager  
[corinna.turbes@datacoalition.org](mailto:corinna.turbes@datacoalition.org)  
202-573-7975

July 20, 2020

RE: Continuation of the Business Pulse Survey

The Data Coalition is America's premier voice on data policy. As a membership-based business association, the Data Coalition advocates for responsible policies to make government data high-quality, accessible, and usable. Our work unites data communities that focus on data science, management, evaluation, statistics, and technology in companies, nonprofit organizations, and academia.

The Data Coalition supports the continuation of the Business Pulse Survey because of the tremendous utility of the information collected. As decision-makers consider interventions to address the effects of the COVID-19 pandemic, having clear information on what these effects are is crucial to making evidence-based policies. This survey will help develop a clearer picture of business operations, employment, worker hours, and the availability of consumer goods and services. Providing this data promptly through a pulse survey will help policymakers develop more responsive and effective interventions in a rapidly changing and unpredictable economy.

Research into social well-being and mental health is already being conducted with the support of private sector organizations, such as the Data Foundation's [COVID Impact Survey](#). These projects help to fill the information gaps while our official government data sources worked to expand their products to cover new questions brought up by the pandemic. It is necessary to complement these surveys with an understanding of the well-being and considerations of business establishments.

However, the Census Bureau's technical expertise and extensive reach mean it has a unique ability to create and disseminate data products based on large amounts of information. This also provides an opportunity for the Census Bureau to test internal processes and systems as well as a more collaborative collection activity that takes advantage of the expertise throughout the statistical system. Having this experience may help the Census Bureau to quickly deploy a similar strategy in the event of future economic crises.

Extending this information collection will not only provide vital information, but it will also provide the Census Bureau with an opportunity to experiment with new and innovative ways of collecting accurate, timely, and relevant information.

Thank you for the opportunity to submit comments on this important issue. If you or your staff have any questions about the Data Coalition's comments, please contact Corinna Turbes at [corinna.turbes@datacoalition.org](mailto:corinna.turbes@datacoalition.org).

Respectfully,  
Corinna Turbes  
Data Coalition

## Comment on SBPS Notice

Kermit Kubitz

San Francisco, CA

A Census Bureau survey of small business during the Covid-19 Pandemic should include data about the effectiveness of the CARES Act and PPP payments. This would mean questions that ask 1. Have you applied for a PPP loan or an EIDL loan? 2. Was your request approved and if so, how long was the time between the application and receipt of funds? 3. If that request has not been approved, how long has a PPP or EIDL request been pending? 4. What is the amount requested under the Cares Act? 5. What amount was received and if was different from the amount requested, what was the difference? 6. How much of the amount received or to be received would have been spent on employees and payroll? 7. If any funds were EIDL amounts, how many employees were counted for a \$1000 cap per employee? 8. How will the loans be repaid, and if a time period is expected, how long do you expect these loans to take to be repaid? 9. Do you expect that some of the PPP loans will be forgiven? 10 If so, how much of the PPP loans do you expect will be forgiven?



July 20, 2020

Mr. Thomas Smith  
PRA Liaison  
U.S. Census Bureau  
4600 Silver Hill Road  
Washington, DC 20233

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Hon. Edward R. Roybal †

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EVP and Director of  
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Parking Company of America

## CHIEF EXECUTIVE OFFICER

Mr. Arturo Vargas

† deceased

Re: DOC Docket No. USBC-2020-0012 - Comments on Small Business Pulse Survey

Dear Mr. Smith:

On behalf of the National Association of Latino Elected and Appointed Officials (NALEO) Educational Fund, I am writing to comment on the U.S. Census Bureau's Small Business Pulse Survey, which is designed to assess the impact of the COVID-19 pandemic on small businesses (the "SBPS"), in response to the Notice published at 85 Fed. Reg. 29923 on May 19, 2020. We are concerned that the response mode and the contact strategy for the SBPS will not adequately capture responses from the Latino small business sector, and we offer recommendations to address our concerns.

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 6,800 Latino elected and appointed official, and include Republicans, Democrats and Independents. NALEO Educational Fund is a national leader in Census outreach, community education and policy development. Since the 1990 Census, our organization has conducted outreach campaigns to promote the full and accurate count of the Latino community. Together with media and community-based organizational partners, we have launched iHAGASE CONTAR! ("Make Yourself Count!") and iHAZME CONTAR! ("Make Me Count!") campaigns to drive response to the 2020 Census through dissemination of community education materials; promotion of a toll-free Census information hotline staffed by bilingual operators; technical assistance for community groups; and direct assistance to Latino residents with completing Census forms. NALEO Educational Fund also conducted comprehensive research to inform its campaigns and determine the best messages and messengers to reach the Latino community. The research included a survey of a nationally-representative sample of Latino adults, which allowed the organization to compare the perspectives of both documented and undocumented residents. We also conducted focus groups with diverse segments of the Latino population.

NALEO Educational Fund also has decades of experience working closely with its Latino elected official constituency, other government officials and partner organizations to promote public policies to achieve the most accurate count possible of the nation's population. NALEO Educational Fund served as a member of the Census Bureau's national advisory committees between 2000 and August 2019, and continues to share its expertise with top Census Bureau officials. NALEO Educational Fund is also the co-chair of the Leadership Conference on Civil and Human Rights' Census Task Force, and of the National Hispanic Leadership Agenda's Census Task Force.

NALEO Educational Fund commends the Census Bureau for its effort to collect near real-time data about the impact of the pandemic on the functioning of small

businesses, including its impact on business operations, employment, worker hours, and the availability of consumer goods and services. These data are critical to guide policymakers and the public in making sound decisions during a time of economic crisis. We also applaud the Bureau's efforts to assess the execution of a high-frequency, quick turnaround survey. However, NALEO Educational Fund believes that the response mode and the contact strategies for the SBPS will result in the survey failing to include a representative sample of Latino-owned small businesses, and inaccurately reflecting the full range of Latino small-scale business activities. Our first concern is the Bureau's use of the Centurion online reporting system for data collection for the SBPS. Attached is a copy of comments we have submitted on the Household Pulse Survey that set forth our concerns about how the use of an online reporting system and related contact strategies will impair the ability of the survey sample to accurately represent the Latino population. We believe the concerns we have raised about reaching and obtaining responses from many segments of the Latino population are relevant for the ability of the SBPS to collect data from Latino small business owners.

In addition, many Latinos engage in small-scale business enterprises through the "informal economy," which may include street vendors, home-based businesses, or businesses where employees are primarily domestic workers or day laborers. We believe that the SBPS' data collection approaches will not capture the impact of the pandemic on the informal economy sector, and thereby fail to reflect the experiences of a significant segment of Latino businesses and workers.

Finally, the Bureau is only making the SBPS questionnaire available in English, and has not developed a Spanish-language questionnaire. According to 2018 American Community Survey data (1-year estimates) over one-third of Latino adults (35%) are not yet fully proficient in English. Thus, a significant number of Latino business owners will fail to understand or complete the SBPS, and the survey sample will not include a representative sample of all of the nation's business owners.

Because the data collection strategies for the SBPS could result in a sample which does not accurately represent the full range of small-scale Latinos business activities, we recommend that the Bureau consider the following to address possible sample bias in the survey:

- Conduct an evaluation of the Bureau's SBPS design and methodology, including its weighting methodology, to better assess how representative the Survey's sample is, and the quality of the data produced, particularly with respect to the informal economy.
- Augment the collection of data and contact strategies by adopting approaches that would better capture business activity in the informal economy, and would better reach business owners who lack access to online response platforms or are experiencing business location instability. This should involve conducting interviews with respondents using live telephone interviews.
- Develop and make available a Spanish-language SBPS questionnaire and related survey outreach materials.

We greatly appreciate the Bureau's work to provide a new data source with timely and relevant information about the impact of the pandemic on our nation's small businesses. We believe our recommendations will enhance the Bureau's ability to achieve this goal, and we

Mr. Thomas Smith  
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look forward to continuing our partnership with the Bureau as it proceeds with the SBPS and other data collection efforts.

Sincerely,

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

Arturo Vargas  
Chief Executive Officer







## ATTACHMENT

July 20, 2020

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Hon. Edward R. Roybal<sup>†</sup>

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EVP and Director of  
New Business Development,  
Parking Company of America

### CHIEF EXECUTIVE OFFICER

Mr. Arturo Vargas

<sup>†</sup> deceased

Ms. Cassandra A. Logan  
Survey Director, Household Pulse Survey  
U.S. Census Bureau  
4600 Silver Hill Road  
Washington, DC 20233

Re: DOC Docket No. USBC-2020-0013 – Comments on Household Pulse Survey

Dear Ms. Logan:

On behalf of the National Association of Latino Elected and Appointed Officials (NALEO) Educational Fund, I am writing to comment on the U.S. Census Bureau's Household Pulse Survey During COVID-19 Epidemic (the "Household Pulse Survey"), in response to the Notice published at 85 Fed. Reg. 29922 on May 19, 2020. We are concerned that the response mode and the contact strategy for the Household Pulse Survey will not adequately capture responses from the Latino population, and we offer recommendations to address our concerns.

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 6,800 Latino elected and appointed official, and include Republicans, Democrats and Independents. NALEO Educational Fund is a national leader in Census outreach, community education and policy development. Since the 1990 Census, our organization has conducted outreach campaigns to promote the full and accurate count of the Latino community. Together with media and community-based organizational partners, we have launched iHAGASE CONTAR! ("Make Yourself Count!") and iHAZME CONTAR! ("Make Me Count!") campaigns to drive response to the 2020 Census through dissemination of community education materials; promotion of a toll-free Census information hotline staffed by bilingual operators; technical assistance for community groups; and direct assistance to Latino residents with completing Census forms. NALEO Educational Fund also conducted comprehensive research to inform its campaigns and determine the best messages and messengers to reach the Latino community. The research included a survey of a nationally-representative sample of Latino adults, which allowed the organization to compare the perspectives of both documented and undocumented residents. We also conducted focus groups with diverse segments of the Latino population.

NALEO Educational Fund also has decades of experience working closely with its Latino elected official constituency, other government officials and partner organizations to promote public policies to achieve the most accurate count possible of the nation's population. NALEO Educational Fund served as a member of the U.S. Census Bureau's national advisory committees between 2000 and August 2019, and continues to share its expertise with top Census Bureau officials.

NALEO Educational Fund is also the co-chair of the Leadership Conference on Civil and Human Rights' Census Task Force, and of the National Hispanic Leadership Agenda's Census Task Force.

NALEO Educational Fund commends the Census Bureau for its effort to collect near real-time data about the social and economic impact of the COVID-19 pandemic in a time of urgent and unprecedented need. We also applaud the Bureau's work in assessing whether collaborative data collection between federal agencies can produce high quality information to guide our nation during this crisis. However, NALEO Educational Fund believes that the response mode and the contact strategies for the Household Pulse Survey will not result in the survey including a representative sample of the Latino population or other population groups.

Our first concern is regarding the response mode, the Qualtrics online data collection platform. According to August 2019 research published by the Pew Research Center, while the "digital divide" is narrowing, Latino adults are less likely than White adults to own a computer or tablet, or have access to high speed internet at home. For example, 57% of Hispanic adults own a computer compared to 82% of White adults; 43% of Hispanic adults own a tablet device compared to 53% of White adults; and 61% of Hispanic adults have broadband access compared to 83% of White adults. Moreover, while many Latinos have access to smartphones, there are disparities between smartphone access between native-born and foreign-born Latinos, with 87% of native-born Latinos owning smartphones compared to 69% of foreign-born Latinos. Pew research has also indicated that older adults, those with lower incomes, and those in rural areas generally have less access to computers or broadband technology. Thus, the use of an online response platform for the Household Pulse Survey will not capture a representative sample of Latinos or other population groups – and it is unclear whether weighting the sample will overcome this problem.

In addition, the Household Pulse Survey will contact potential respondents through e-mail or SMS text. However, as noted above, there are disparities within and between different population groups with respect to computer, broadband and smartphone access. Moreover, e-mail and SMS text contact strategies are less effective in reaching households where there is high mobility, or residential instability. Even before the pandemic, according to Census Current Population Survey data, Latinos were a more mobile population than non-Hispanic Whites. Data which examined mobility between 2018 and 2019 revealed that 10.6% of Latinos were "movers" compared to 8.6% of non-Hispanic Whites. Within the Latino population and the population as whole, young persons, persons living in poverty, renters, and non-citizens were among the groups with the highest mobility rates. All of these groups would be harder to reach and capture with the Household Pulse Survey's contact strategies, because of the likelihood that they would not have stable e-mail addresses or cellphone numbers.

After the advent of the pandemic, the mobility of the Latino population has likely increased even more because of a variety of factors, including economic instability and job losses, family care arrangements and responsibilities, and evictions or changes in renter housing. Data analyses by Latino Decisions, UCLA's Latino Policy and Politics Initiative, the Centers for Disease Control and other entities suggest that COVID-19 is



Ms. Cassandra Logan  
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disproportionately affecting Latinos, and Pew Research Survey data indicate that Latinos are more likely than Americans overall to see coronavirus as a major threat to their health and finances. The pandemic is also likely to disproportionately affect other population groups with high mobility, such as youth, persons living in poverty, renters and non-citizens.

Thus, the contact strategies for the Household Pulse Strategy could result in a sample which does not accurately represent Latinos and other groups who are experiencing higher mobility and residential instability than the population as a whole. We recommend that the Bureau consider the following to address possible sample bias in the survey:

- Conduct an evaluation of the Bureau's Household Pulse Survey design and methodology, including its weighting methodology, to better assess how representative the Survey's sample is, and the quality of the data produced.
- Augment the collection of data and contact strategies by adopting approaches that would better capture populations who lack access to online response platforms or are experiencing residential instability. This should involve conducting interviews with respondents using live telephone interviews.

We greatly appreciate the Bureau's work to provide a new data source with timely and relevant information about the impact of the pandemic on our nation's households. We believe our recommendations will enhance the Bureau's ability to achieve this goal, and we look forward to continuing our partnership with the Bureau as it proceeds with the Household Pulse Survey and other data collection efforts.

Sincerely,



Arturo Vargas  
Chief Executive Officer

NALEO  
Educational Fund