



ASIAN AMERICANS
**ADVANCING
JUSTICE**
AAJC

VIA EMAIL

April 12, 2021

Sheleen Dumas
Department PRA Clearance Officer
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Commerce Department
Email: acso.pra@census.gov

Re: American Community Survey Methods Panel Tests
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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 of its mission to advance the civil and human rights of Asian Americans and build and promote a fair and equitable society for all. Advancing Justice | AAJC has maintained a permanent census program that monitors census policy, educates policy makers, and conducts community outreach and education to encourage participation in the surveys conducted by the Census Bureau, including running nationwide Asian American-focused campaigns for Census 2000, Census 2010, and Census 2020. Advancing Justice | AAJC has also served as a member of numerous advisory committees to the Census Bureau since 2000, including, most recently, the National Advisory Committee on Racial, Ethnic and Other Populations, for which we served our second three-year term through August 2019. Additionally, Advancing Justice | AAJC currently co-chairs the Leadership Conference on Civil and Human Rights' Census Task Force.

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 certain aspects of the American Community Survey Methods Panel Tests.

Self-Response Mail Messaging and Contact Strategies Testing

We support and look forward to seeing the results of the self-response mail messaging and contact strategies testing. We believe that the efforts to use plain language to improve communications and updating messages to motivate response are necessary shifts in tactics to be responsive to our ever-changing environment and increase participation in the ACS, particularly by groups traditionally harder to engage. Plain language will facilitate uniform comprehension by readers of all levels, as well as for readers for whom English is a second language. It also supports better translations into other languages.

Motivational messages must be updated to be responsive and sensitive to current conditions, such as the pandemic and the resulting economic instability for some. These messages must work across different communities, including Asian Americans who have previously been less aware about the Census Bureau and its surveys as well as more skeptical or distrusting of the government. These messages must also be understood across different cultures and languages; they cannot rely on concepts or idioms that only exist in the English language.

Finally, we urge the Bureau to continue to look for ways to engage language minority participants in-language through its messaging and contact strategies. In addition to including in-language messaging that provide ways respondents can get assistance, messaging should be included that highlight all self-response options that provide language support.

Testing the Use of Administrative Data

As a general note, we are concerned about a move to replacing or substituting all or parts of the ACS with administrative records. Racial disparities in administrative records have been documented in different contexts, such as in healthcare and policing. Any disparities in administrative records would be carried over if administrative records replaced portions of the ACS. This is particularly problematic for smaller population groups who are already more likely to be missed by the ACS and less likely to be captured in administrative records.

Additionally, due to the lack of standardization across administrative databases on how race and ethnicity data are reported and collected, a large portion of our community could potentially be missed through the use of administrative data. In many datasets, “Asian” and “NHPI” responses are lumped into an “Other” category, making it impossible to determine which individuals would identify as Asian American or NHPI. Outside of the data produced by the Census Bureau, detailed data on Asian American and NHPI subgroups are simply unavailable. Thus, any use of administrative data to replace portions of the ACS would mean that those portions of the ACS would not include detailed (or any depending on the record used) respondent information about Asian Americans or Pacific Islanders. For these reasons, using administrative data to supplant parts of the ACS - rather than supplement it - is alarming.

It is promising that the current testing will include all modes of data collection as the type of response mode that respondents choose is correlated with different socioeconomic characteristics. But the Bureau should proceed with great caution in a wholesale replacement of parts of the ACS. This will require significant testing and engagement with census stakeholders. The Bureau should sparingly use administrative records only when it is confident in both the quality of the data provided through the records and the coverage of the data across different communities, particularly those who are traditionally hard to count.

Content Testing

We are interested in seeing the results of the content test. There are a number of potential changes that are of particular interest to us, including household roster, educational attainment, health insurance, disability, and income. We hope that the testing will take into consideration not just the different modes of response but whether responses were provided in different languages. It will be important to understand if the changes resonate in both English and the other languages supported by the Bureau. It will also be important for us to understand the impact of each of the proposed changes both as an individual question as well as a part of the larger survey.

We reiterate our disappointment that the Census Bureau did not select the question format that was most successful in its 2015 National Content Test (NCT) for the questions on race and ethnicity on the 2020 Census. Recognizing that there were factors outside of the Bureau's control, we wanted to re-raise the need to restart this process and discussion. The expansive use of checkboxes for racial and ethnic groups, the combining of the race and ethnicity questions, and the addition of a Middle Eastern North African response option are long overdue. We should not have to wait for the next Decennial Census to modernize how questions on race and ethnicity are asked to more closely align with the way society currently views race and ethnicity.

Internet Instrument Testing, Respondent Help Testing, & Nonresponse Follow up Data Collection Testing

As the Census Bureau embarks on testing to improve its models, including those that are technology-based, we recommend that the language needs of limited-English proficient persons be an integral part of test planning and execution. Even if the Bureau is not currently planning on expanding its language support for the ACS, it is important that as new processes, procedures, and technologies are created, these products allow for the expansion of language support without reconfiguring a whole system. For example, while the ACS questionnaire is currently only available in English and Spanish, the Census Bureau could decide to utilize an internet instrument in additional languages. It would be important for that capability to be designed up front into the system. Similarly, as assistance modules are designed, whether it is through the phone system or a chat functionality, planning

ahead to support multiple languages – some of which may not rely on the Roman alphabet – would be the prudent way forward.

Conclusion

We appreciate the opportunity to provide comments on the American Community Survey Methods Panel Tests. We look forward to working with the Bureau to plan for the ACS and the 2030 Census. Please feel free to contact Terry Ao Minnis, Senior Director of Census and Voting Programs, at tminnis@advancingjustice-aaajc.org or (202) 815-4412 if you have any further questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'John C. Yang', with a stylized, sweeping underline.

John C. Yang
President and Executive Director
Asian Americans Advancing Justice | AAJC