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November 15, 2021

Ms. Sheleen Dumas
Departmental Lead PRA Officer
Office of the Chief Information Officer
U.S. Department of Commerce
14th and Constitution Avenue, NW
Washington, DC 20230

Dear Ms. Dumas:

On behalf of NALEO Educational Fund, I write to comment on the Bureau's planning, research and implementation activities for the American Community Survey (ACS). These comments are in response to the proposed information collection published by the Bureau on September 14, 2021, at 86 FR 51112.

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 officials, 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 led the 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 a robust social media and advertising campaign.

In addition, NALEO Educational Fund is a leading expert on Census policy development, with a long record of service on the Bureau's National Advisory Committees. The organization serves as co-chair of the Leadership Conference on Civil and Human Rights' Census Task Force, a Steering Committee member of the Census Counts Campaign, and the co-chair of the National Hispanic Leadership Agenda's Census Task Force. We also work closely with our Latino elected and appointed official constituency and our community partners on Census policy and outreach, and we are extremely familiar with their data needs. Our organization itself uses ACS data for a variety of research and program efforts. Thus, the ability to obtain accurate, relevant, and accessible ACS data is critical to all our work.

In these comments, we encourage the Bureau to evaluate the implications of a potential Census 2020 undercount for the quality of ACS data, and to examine options to ameliorate the detrimental consequences of such an undercount. We also urge the Bureau to continue to assess the impact of the release of 2020 ACS 1-year experimental estimates and the delay in releasing the 2016-2020 ACS 5-year estimates on the full range of activities for which such data are used. In this connection, we believe the Bureau should provide stakeholders with more specific guidance on the use of the experimental estimates. In addition, we recommend that the Bureau increase the sample size of the ACS, and engage stakeholders in a dialogue about the best approach to doing so. Finally, we urge the Bureau to encourage the Office on Management and Budget (OMB) to revive efforts to modernize the Hispanic origin and race questions, and conduct additional research to understand the implications from the

Bureau's new approach to coding question responses in Census 2020 and the wording changes in the race and Hispanic origin questions.

I. Implications of Potential Census 2020 Undercount for ACS Data

There is growing evidence of a potential undercount of Latinos and young children in Census 2020, with emerging analyses from several different institutions and data experts. Given this evidence, as the Bureau proceeds with its Census 2020 evaluation and data quality indicator activities, we urge the Bureau to also assess the impact of a potential undercount on the quality of ACS data. The Bureau should also be prepared to continue this assessment should the Post-Enumeration Survey or other analyses provide more definitive evidence that an undercount occurred. This evaluation should include an examination of options to ameliorate the impact of a Census 2020 undercount on the quality of ACS data.

II. Impact of Evolving ACS Data Limitations and Delays on Full Range of ACS Data Uses

In July 2021, the Bureau announced that it will not release its standard 1-year estimates from the 2020 ACS because of the impacts of the COVID-19 pandemic on data collection, and would instead release experimental estimates developed from 2020 ACS data. The Bureau has also informed stakeholders that the publication of the 2016-2020 ACS 5-year estimates will be delayed beyond December 2021, the originally-anticipated publication date, with the Bureau providing an update on the publication schedule in December.

We commend the Bureau for adhering to high data quality standards with its decision not to publish standard ACS 2020 1-year estimates, and we greatly appreciate the Bureau's transparency in setting forth the specific factors which affected its decision. Given the widespread use of ACS data by public and private decisionmakers, we urge the Bureau to evaluate and provide stakeholders with information about the implications of the limitations of the ACS experimental data and the delayed release of the 2020 ACS 5-year estimates for the Latino community. This should involve providing as much information as is feasible about the Bureau's methodology and data sources for developing the experimental estimates.

In addition, we understand the Bureau has initiated dialogues internally and with other agencies about the impact of the release of the experimental estimates on funding formulas. Similarly, we encourage the Bureau to also evaluate the impact of ACS data limitations on civil rights enforcement and other purposes for which ACS data that are used. As the Bureau assesses these limitations, it should also examine options to ameliorate any detrimental consequences for data about and issues affecting the Latino community.

In this connection, we commend the Bureau for the information it has provided through reports and working papers about issues affecting the quality of ACS data and factors affecting ACS response. We encourage the Bureau to continue this research, and make it more accessible to stakeholders, particularly with respect to challenges the Bureau encountered beyond the pandemic. The Bureau has explored some of these issues in working papers, which are generally only accessible to sophisticated data experts. It should consider providing information about these issues in blogs or other more accessible formats.

Given the potential undercount of young children in Census 2020, the Bureau should also assess its efforts to improve the reporting of young children in the 2020 ACS through enhancements to the instructions about reporting babies' ages in the 2020 ACS questionnaire. We understand that the overall challenges experienced by the Bureau with respect to response rates generally might complicate its ability to obtain comprehensive meaningful results from such research, but we encourage the Bureau to at least assess what it might be able to learn about the effect of the 2020 enhancements.

We understand that the Bureau intends to provide general information to data users about the limitations of the experimental estimates, with a general caution that users should use their discretion about whether the data are suited for their particular needs. We encourage the Bureau to provide more specific guidance on how these data can be used, given their limitations, such as any possible assessments of thresholds of reliability of certain demographic characteristics at certain levels of geography. We believe the Bureau should consult with data users about the type of guidance that would be the most useful for various statistical uses, and about whether there are statistical or methodological approaches to mitigate the limitations of the experimental estimates.

III. Increasing the Sample Size of the ACS

We also urge the Bureau to assess the feasibility of enlarging the sample size of the ACS to provide better data about smaller geographic areas and demographic groups. As the Latino community continues to grow larger and more diverse, the data provided by the ACS on such characteristics as income, educational attainment, employment status, nativity and citizenship, and linguistic abilities become even more important for policymakers, community organizations, and other stakeholders in meeting the needs of the communities they serve. Enlarging the sample size of the ACS would allow these stakeholders to use statistically sound data to better design and target initiatives for smaller and demographically distinct populations at lower levels of geography.

We understand that there is evolving discussion within the community of demographic and statistical experts about the increasing difficulty of obtaining responses to surveys, and that the Bureau continues to use and examine other approaches beyond survey responses to compiling and analyzing data. We encourage the Bureau to engage data experts and other stakeholders in a dialogue about the approach the Bureau should take regarding enlarging the larger ACS sample size in the context of evolving developments regarding the use of survey data. This dialogue should include an assessment of the implications of the foregoing issue for obtaining complete and accurate data about the Latino community.

IV. Research and Evaluation to Modernize the ACS Questions on Hispanic Origin and Race

Because of the overwhelming amount of sound research conducted by the Census Bureau supporting the use of the “one combined question” approach to asking respondents about their Hispanic origin and race, NALEO Educational Fund has advocated for the adoption of the Bureau’s recommendations on this question format for all of its relevant data products since at least 2017. However, the Bureau’s implementation of its recommendation required a revision of racial and Hispanic origin data standards by the OMB, a process which was essentially derailed at the end of 2019, when an OMB-coordinated Interagency Working Group failed to make public a report regarding the potential revision of the categories.

Census 2020 data also suggest that the “two separate questions” approach for asking about Hispanic origin and race does not elicit quality data from Latinos and other population groups. In Census 2010, 7.04 percent of the population identified as “Some other race (alone or in combination),” and 95.2 percent of these respondents were Latino. In Census 2020, the share of the population which identified as “Some other race (alone or in combination)” increased to 15.1 percent, and 90.8 percent of these respondents were Latino. Moreover, by Census 2020, “Some other race (alone or in combination)” had become the nation’s second largest racial group.

NALEO Educational Fund recommends that the Bureau encourage the OMB to pursue the revision of the OMB federal data standards on Hispanic origin and race. We also urge the Bureau to conduct additional

research about the Hispanic origin and race data which examines the impact of the Bureau's new approach in Census 2020 to coding responses on data quality and the changes it made to the questions on Hispanic origin and race. This should include assessing the impact of the coding approach on responses obtained from a combined Hispanic origin and race question and if the wording changes in 2020 have implications for possible wording changes in a subsequent combined race and ethnicity question.

Conclusion

It is critical that the ACS continues to serve as a premier source of data between the decennial Censuses on a broad range of demographic characteristics that are invaluable for the work of decisionmakers in the public and private sector. We appreciate the Bureau's efforts to produce the highest quality ACS data possible given evolving public health, social and statistical challenges, and we look forward to working with the Bureau to achieve this important goal.

Sincerely,

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

Arturo Vargas
Chief Executive Officer