



FOUNDER EMERITUS

Hon. Edward R. Roybal[†]

[†]deceased

CHAIR

Hon. Mara Candelaria Reardon
Board Trustee,
Lake County Public Library

TREASURER

Mr. Rick R. Olivarez, Esq.
Partner, Olivarez Madruga
Lemieux O'Neill, LLP

SECRETARY

Ms. Michelle Mancias, Esq.
Assistant VP and Counsel,
State Farm®

May 9th, 2022

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 the National Association of Latino Elected and Appointed Officials (NALEO) Educational Fund, I write to comment on the Census Bureau's 2022 American Community Survey (ACS) Content Test. These comments are in response to the proposed information collection published by the Bureau on March 21, 2022, at 87 FR 15909.

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 7,000 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 fully consider and evaluate the implications of the complex living arrangements within the Latino community when assessing the Content Test's research on Household Roster questions. This is particularly important, given the complexity of Latino living arrangements and the Content Test's goal of improving within household coverage and more fully capturing such complex living arrangements. In addition, the Federal Register notice sets forth the agency's plans to conduct research to determine the feasibility of using administrative sources as a replacement for or supplement to the information which would have otherwise been obtained from ACS questions currently fielded on topics such as income, employment and labor force participation. While we

welcome the Bureau's effort to continue to explore the use of administrative data for the purpose of strengthening survey programs and easing the burden of response to federal surveys, we have several concerns regarding the quality of administrative records about Latinos and other population groups, which would potentially impair the Bureau's ability to use the records effectively for the purposes it has set forth in the Bureau's information collection notice. We also urge the Bureau to consult with data experts and stakeholders who are familiar with historically undercounted communities before it makes any decisions to change ACS questions based on the results of the 2022 ACS Content test, and we encourage the Bureau to be fully transparent about the findings of the administrative records research. Finally, as the Bureau moves forward with the Content Test, we believe it should be mindful of the overall context of the challenges and opportunities for improvement facing the collection of data about Latinos and very young children, given the initial results of the Census 2020 PES national net undercount estimates. Ultimately, we urge the Bureau to assess how it conducts the Content Test and assesses its results in connection with its overall efforts to modernize census data collection and enhance the quality of data on Latinos and other historically undercounted population groups.

Revisions to Household Roster questions

Obtaining an accurate snapshot of our population's living arrangements is critical for the sound allocation of governmental resources and decision-making in the public and private sector. We applaud the Bureau's continual pursuit of improvement in this area, including its efforts to enhance within household coverage and improve the capture of complex living arrangements. However, given the prevalence of such complex living arrangements in the Latino community—especially among Latino immigrants and very young children—we are concerned that potential changes to the Household Roster questions on the ACS might have unintended detrimental consequences for the quality of data about living arrangements in the Latino community. As highlighted in a 2018 brief by the Leadership Conference Education Fund, 55 percent of Latino children live in a household with complex living arrangements, sometimes moving between various relatives' or caregivers' residences¹. In addition, according to this issue brief, one-quarter of young Latino children also live in a linguistically isolated household where adults have difficulty speaking English. Considering these findings, as the Bureau moves forward with the 2022 ACS Content Test, we encourage the agency to fully consider and evaluate the effect of the complex living arrangements within the Latino community when making decisions about changing question content on the ACS.

Using administrative sources as a replacement or supplement questions currently fielded on the ACS survey

As stated in the Bureau's Information Collection notice, the agency is conducting research to determine the feasibility of using administrative sources as a replacement for or supplement to information currently collected by the ACS on topics such as income, employment, and SNAP program participation. While we agree that there is a need to test the use of administrative records as a tool to improve the quality of ACS estimates for these topics, we urge the Bureau to continue to carefully consider the limitations of such records in producing accurate data on persons of color, lower-income, and other historically undercounted or underserved populations. For example, one Bureau comparison of data from representative administrative records to results of the 2010 Census revealed that the two sources agreed

¹ Latinos in the 2020 Census. 2018. <https://civilrights.org/resource/will-you-count-latinos-in-the-2020-census/>

on one of the most basic elements of the decennial Census—number of residents living at a given address—just 62% of the time.

Additional testing by the Census Bureau and other research have revealed that administrative records often lack quality information about race, ethnicity, and household relationships. Moreover, in 2015, Dr. William O'Hare published an analysis of various studies attempting to match either 2010 Decennial Census data or 2010 ACS data with that from administrative records, and found that generally, the youngest children (ages 0–2) had the lowest match rates of any age group for both data sets. The analysis also found that match rates for young Latino children ages 0 to 2 were lower than those for other major race or ethnic groups in this age range. In addition, one study examined by Dr. O'Hare found only a 32 percent match rate for all records between data from New York SNAP files and the 2010 Decennial Census. Given that the Bureau is researching the use of administrative records in part to supplement ACS information on SNAP and other topics affecting households with very young children, it is important that it continue to consider the limitations revealed in the foregoing body of research as it conducts and assesses the results of the ACS Content Test.

Continued consultation with data experts and stakeholders

As the Bureau moves forward with the 2022 ACS Content test and the related research on administrative records, we urge the agency to continue to consult data experts and stakeholders who are familiar with historically undercounted communities, before it makes any final decisions about modifying ACS questions or expanding the use of administrative records. The Bureau should be fully transparent about the results of the ACS Content Test and any challenges it encountered in conducting the Test. With respect to the research on administrative records, the Bureau should also provide data experts and stakeholders with information about how it has evaluated the quality of data obtained through the records, and any limitations it has found with respect to the accuracy and consistency of those data. If it makes any decisions about the future use of data from the records to supplement or replace ACS questions, it must also provide comprehensive and detailed information on precisely how it intends to use these. This continued consultation will greatly enhance the accuracy of ACS estimates, particularly with respect to historically undercounted or underserved communities.

The national net undercount of Latinos and other population groups and Census modernization

We greatly appreciate the Bureau's efforts to test whether proposed changes to ACS questions can produce higher quality data, and we urge the Bureau to assess the 2022 ACS Content Test in the larger context of the broad range of data challenges and opportunities for improvement it is confronting. For example, the Post-Enumeration Survey estimates for Census 2020 revealed a 4.99 percent national net undercount of Latinos, and 2.79 percent national net undercount of very young children (ages 0–4). The Bureau should thoroughly assess the implications of these undercounts for ACS data collection on Latinos and very young children – this is especially salient given that research spearheaded by Dr. O'Hare which found that the Census national net undercount rate for very young Latino children ages 0–4 was 7.1 percent compared to 4.3 percent for non-Latinos. It is also relevant in the context of the past research on administrative records and the data quality of records on Latino children ages 0-2.

As part of the Bureau's foregoing assessment, we also urge the agency to examine options to ameliorate the impact of the Census 2020 net undercounts on the quality of data produced by the ACS. Ultimately, we encourage the Bureau to continue to consider the larger issue of how the Bureau can modernize the

collection of data for the decennial Census, the ACS, and other data products, given such developments as emerging technology, evolving statistical approaches, and changes in how our nation's residents respond to surveys. Moreover, the modernization must move forward with a view to significantly enhancing the completeness and accuracy of data on historically undercounted and underserved communities. We believe the Bureau shares this vision, and we look forward to working with the agency to achieve this important goal.

Sincerely,

A handwritten signature in black ink, appearing to read "Arturo Vargas", with a long horizontal flourish extending to the right.

Arturo Vargas
Chief Executive Officer