



ASIAN AMERICANS
**ADVANCING
JUSTICE**
AAJC

VIA EMAIL

November 14, 2022

Sheleen Dumas
Department PRA Clearance Officer
Office of the Chief Information Officer
Commerce Department
Email: acso.pra@census.gov

Re: Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; American Community Survey and Puerto Rico Community Survey
(Document Citation: 87 FR 55990)

Asian Americans Advancing Justice | AAJC (Advancing Justice | AAJC) is a national non-profit, non-partisan organization founded in 1991. For over thirty years, we have served as the leading Asian American voice on civil rights issues in our nation's capital. Our mission is to advance civil and human rights for Asian Americans and to build and promote a fair and equitable society for all. Our expertise on issues of importance to the Asian American community is widely acknowledged in the media, by the public, and by policymakers at the federal, state, and local levels.

Advancing Justice | AAJC considers data collection and reporting to be the backbone of its mission. We have been working to eliminate the barriers that have historically resulted in the undercounting and underreporting of Asian Americans and NHPs in federal data collection and analysis efforts, particularly in the decennial census count. Our permanent census program monitors census policy and educates policy makers—including through testifying at Congressional hearings—and conducts community outreach and education on 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 and serves as a co-coordinator of the Census Count campaign.

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 the aspects of the ACS referenced in the notice (87 FR 55990).

Internet Self-Response Option to Group Quarters Data Collection Operation

- *"In 2024, the ACS plans to add an internet self-response option to the group quarters data collection operation. The Census Bureau believes there is value in offering a self-response option to people living in certain types of group quarters—college/university student housing, group homes, military barracks, workers' group living quarters and Job Corps centers, and emergency and transitional shelters."*

It is important to ensure that the laudable goal of expanding opportunities to respond to the ACS does not inadvertently harm certain segments of the population due to less access. There may be inequities between different types of group quarters; residents of some types of group quarters can more easily respond online. For example, college/university student housing will have more and/or easier access to internet as compared to emergency and transitional shelters or workers' group living quarters. Therefore, the Census Bureau should research (1) ways to increase access to the new online option for residents of all group quarters, with a focus on group quarters that have less access; and (2) additional methods for improving the enumeration of group quarters residents who might face barriers to online response. We know that the digital divide exists, and indicators suggest that there are likely millions of Asian Americans and Native Hawaiians and Pacific Islanders for whom the digital divide is yet to be bridged. Therefore, we expect Asian Americans and other low-income communities of color in group living quarters may have a harder time accessing the online options.

Use of administrative data for ACS beginning with the 2024 data collection year

- *"Beginning with the 2024 data collection year, the ACS will use administrative data. ... The Census Bureau is focusing initial efforts to supplement or replace ACS survey data for several housing characteristics with administrative data from other sources, such as property tax records. At a minimum, administrative data will be used for the question asking about property acreage beginning in 2024. Implementation for other housing items, such as agricultural sales and year built, may start later."*

We are concerned about replacing or substituting all or certain 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, including Native Hawaiians and Pacific Islanders 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 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, in some cases, any—respondent information about Asian Americans or Pacific Islanders. For these reasons, using administrative data to supplant parts of the ACS – rather than supplement – is alarming.

The Bureau should proceed with great caution in a wholesale replacement of parts of the ACS. To the extent that the initial efforts to utilize administrative records to supplement or replace ACS survey data are limited to several factual housing characteristics, potential harm should be minimal. However, any efforts to use administrative records more extensively to supplement, and in particular supplant parts of the ACS, must be rigorously tested. There must be significant engagement with census stakeholders about such usage. This is particularly true for people characteristics as opposed to housing characteristics. As the Bureau continues to explore using administrative records more extensively, the Bureau should only use administrative records sparingly. Moreover, the Bureau should only do so only when it is confident in both the quality of the data and the coverage of the data across different communities, particularly those who are traditionally hard to count.

Conclusion

We appreciate the opportunity to provide comments on the American Community Survey and look forward to continuing to work with the Bureau on the ACS. Please feel free to contact me at tminnis@advancingjustice-aaajc.org or (202) 815-4412 if you have any further questions.

Sincerely,



Terry Ao Minnis
Senior Director of Census and Voting Programs
Asian Americans Advancing Justice | AAJC