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February 10, 2025

Sheleen Dumas

Departmental PRA Clearance Officer

Office of the Under Secretary for Economic Affairs

U.S. Department of Commerce

Washington, DC 20230

Submitted via email to FLD.Decennial.Oversight@census.gov

RE: *Federal Register* Notice Docket Number USBC-2024-0030, "Decennial Census
Temporary, Intermittent Applicant Information Collection"

Dear Ms. Dumas,

On behalf of The Leadership Conference on Civil and Human Rights, a coalition charged by its diverse membership of more than 240 national organizations to promote and protect the rights of all persons in the United States, and our Census Task Force co-chairs, Asian Americans Advancing Justice | AAJC and NALEO Educational Fund, we appreciate this opportunity to provide comments in response to the Census Bureau's Federal Register Notice on Decennial Census Temporary, Intermittent Applicant Information Collection, which was published on December 6, 2024 (Docket Number USBC-2024-0030).

The proposed Decennial Census Temporary, Intermittent Applicant Information Collection through the Decennial Administrative, Recruiting, Hiring, and Training System (DARHTS) is a step toward streamlining census workforce recruitment. However, ensuring a complete and accurate count requires skilled and well-trained field staff who can serve as trusted messengers in their communities. Below are our recommendations to enhance the hiring process for the 2026 Census Test and future census operations.

Prioritize Multilingual and Paper-Based Accessibility in Recruiting Census Workers

While we recognize the advantages of a streamlined online application system, we are concerned that the lack of a paper-based option will preclude qualified individuals, particularly individuals from persistently undercounted communities, from applying or even knowing about the opportunity to apply. In remote or rural areas where internet access is often limited, paper-based applications are essential to ensure that candidates can be hired from their local communities.

Furthermore, the absence of an online Spanish-language application in the 2026 Census Test will limit participation by applicants with limited English proficiency, particularly in areas with significant Spanish-speaking populations. Not including a Spanish-language application

would be a missed opportunity to evaluate the success of the new hiring system in communities where Spanish-speaking candidates could best fill various field positions.

While future renewals may include paper-based and Spanish-language options, earlier integration of these options would allow the Census Bureau to assess ways to improve outreach and engagement, ensuring these communities are not excluded from the applicant pool. We recommend that the bureau expedite the development of multilingual and paper-based application options, ensuring alignment with its goal to provide access and representation across all communities.

Language barriers remain one of the biggest challenges to ensuring a complete and accurate census, particularly in communities with a larger number of limited English proficiency households. Hiring census workers who are fluent in the languages spoken in their communities is essential to increasing response rates and reducing undercounts. While the Census Bureau has historically allowed legal permanent residents to serve as interpreters, the current job application process does not clearly communicate that work-eligible noncitizens can be considered for positions requiring language skills. This lack of clarity creates confusion for both applicants and community organizations assisting with recruitment. The Census Bureau should state the policy relating to noncitizen hiring clearly and visibly.

Requiring U.S. citizenship for all census workers may unnecessarily limit the available pool of qualified applicants, particularly in communities where noncitizens represent a significant portion of the population. Noncitizens, including lawful permanent residents, asylum seekers, and others authorized to work in the U.S., often have unique insights and language skills that would be invaluable for conducting the 2030 Census, especially in undercounted communities. Allowing a waiver for citizenship requirements, where lawful employment authorization can be verified, would enhance recruitment efforts, improve representation, and ensure a more complete and accurate count. The bureau should develop a waiver process that allows lawful noncitizens to apply for temporary census positions, provided they meet other eligibility requirements and can legally work in the U.S. This policy should include safeguards to ensure compliance with federal employment laws while expanding access to qualified candidates who have the requisite skills to carry out the Census Bureau's work in their assigned areas.

Enhance Application Accessibility for Individuals with Disabilities

Individuals with disabilities face unique barriers to census participation, from navigating inaccessible digital forms to encountering difficulties in understanding materials or communicating with census workers. To ensure full participation by qualified candidates, it is essential that the Census Bureau prioritize accessibility in both its hiring and data collection efforts.

To ensure compliance with Section 508 of the Rehabilitation Act, the DARHTS system must accommodate applicants with disabilities. This includes providing compatibility with assistive technologies such as screen readers, voice navigation tools, and alternative input devices. Beyond this, offering video or text tutorials on how to navigate the system would further assist applicants with varying needs. The bureau should conduct usability testing with individuals with disabilities to ensure the DARHTS platform is fully accessible and incorporate their feedback to address potential barriers before deployment.

We further recommend that the bureau enhance hiring efforts for individuals with disabilities by proactively recruiting individuals with disabilities for temporary census positions, particularly in outreach and enumeration roles where their perspectives can improve engagement with individuals with disabilities. In addition, the bureau should ensure digital accessibility for all census job applications. Lastly, the bureau should ensure that its application and interview processes are accessible by providing materials in Braille, large print, and plain-language formats and ensuring that American Sign Language (ASL) interpretation is available.

Collect and Utilize Recruitment and Demographic Data to Ensure a Highly Skilled Workforce

The inclusion of voluntary questions about recruiting sources, education, and demographic characteristics is a valuable step toward refining recruitment strategies and ensuring equal opportunity for all candidates. Analyzing these data will help identify gaps in recruitment efforts, such as underrepresentation of rural residents, tribal populations, and other historically undercounted groups, and inform tailored recruitment activities to address these gaps. We recommend that the bureau develop a transparent framework for analyzing and reporting on recruitment data to inform targeted outreach strategies to ensure that qualified individuals from all communities can access opportunities for decennial census positions.

Conclusion

By incorporating multilingual and paper application options, ensuring accessibility for individuals with disabilities, and using recruitment data to address differential undercounts, the Census Bureau can optimize the effectiveness of the DAHRTS system. These enhancements will both improve the applicant experience and ensure that the bureau attracts a highly qualified workforce to support its mission.

We thank the Census Bureau for its consideration of our views and for its continued partnership. We look forward to ongoing collaboration in support of our shared goal of a complete, accurate count in 2030. If you have any questions about these comments, please contact Meeta Anand, Senior Director, Census and Data Equity at The Leadership Conference on Civil and Human Rights, at anand@civilrights.org.

Sincerely,

The Leadership Conference on Civil and Human Rights
The Leadership Conference Education Fund
Asian Americans Advancing Justice | AAJC
NALEO Educational Fund