

**September 19, 2025**

**RE: August 20, 2025 [Federal Register Notice](#) on High-Frequency Surveys Program/Household Trends and Outlook Pulse Survey (HTOPS) from Ed Kissam**

I am baffled as to why the FRN regarding this edition of the HTOPS survey research, to be conducted in September 2025, was only published on August 20, 2025, since this precluded input regarding the need to add questions, the possibility of deleting questions, or question phrasing.

I assume that the HTOPS panel design also precludes any modification of sampling procedures. That being said, it clearly would have been useful to over-sample census tracts with substantial proportions of non-citizens, given the generally-accepted hypothesis that adding a citizenship question to the 2030 Census will suppress response from households with non-citizens (Brown, Heggeness, and Murray-Close 2023; Brown and Heggeness 2025) and the practical objective of determining the extent of that suppression and messaging and/or operational changes that would be useful to minimize differential non-response.

Nonetheless, it is very welcome news to see that the Census Bureau is including a number of questions that are definitely relevant to understanding the factors that will affect non-citizen response. It is an important step forward although the survey language is not particularly well-designed for the hard-to-count individuals whose perspectives it seeks to understand.

It should be remembered that the Census 2023 Planning Survey will provide only an initial assessment. It seems to be somewhat better in improving understanding of barriers than in understanding motivators. The survey findings should be understood as important but not definitive; and, ideally, there should be a robust discussion of the limitations of the research.

It will be crucial to follow up with qualitative research, including focus groups but, ideally, also including community ethnographic case studies as was done in 1990, to more fully understand the community dynamics of census as well as the individual and household dynamics of census response. It is extremely important to continually keep in mind that individual decisions about response are linked to multiple dimensions of local community life, that survey respondents' decisions to participate in a survey, especially if there are concerns about the consequences of participation, are forged, in large measure, by the social networks they are engaged in.

My hope is that analyses of the current Census 2030 Planning survey can be completed in time to be incorporated into design of the 2026 Census Test research.

It would also be very helpful to sponsor a convening to discuss implications of the findings with market research experts, social network analysts (not just social media but on-the-ground influencing), and researchers with expertise in differential non-response and resulting differential undercounts.

**Addressing the Major Issues Regarding Census Response from Households with Non-Citizens**

My own data analysis and research have focused on differential response of Latinos and Latino immigrants and resultant undercounts.

I need to stress that is a major component of overall census enumeration because the 2020 AR-based research suggested there was about a 20% undercount of non-citizens in Census 2020 even though there was not a citizenship question or the level of immigration enforcement that we are currently witnessing.

Whether or not these factors that generate differential non-response (and consequent differential undercount) persist is unclear—but Latino Survey research expert Matt Barreto argued that whether or not enforcement practices remain unchanged up through 2030, the effects will linger and will exacerbate the negative impact of the citizenship question.

Supporting Statement A for the endeavor (OMB Control Number 0607-1029) does not have adequate detail to make it clear whether or not the HTOP team has carefully reviewed what has been learned from the 2019 citizenship question test, from the experts' testimony and research included in the litigation about adding the citizenship question in 2020, or the Experimental AR-based 2020 Census or, for that matter, from CBAMS research in prior decennial censuses.

Therefore, I will highlight some crucial analytic issues that emerge from that research in my suggestions about data analysis and reporting from the Census 2030 Planning Survey.

An important consideration in the reporting of findings from the Census 2030 Planning Survey incorporated into HTOPS is whether quantitative analysis is adequate to generate actionable guidance for planning efforts to minimize differential non-response. This is especially concerning since it is reasonable to expect that adding a citizenship question will dramatically suppress responses in large sub-populations of households.

These do not simply include immigrants who lack legal status. It also includes immigrants (referred to by Brown and his team as being of “unknown” legal status, households of mixed legal status, and, quite possibly even households consisting entirely of naturalized citizens. Analytically it will be important to recognize that census response by the head of household for census purposes (i.e. P1) will affect enumeration of everyone residing at a particular address. I estimate that about 10 million households are at risk of response suppression, in large measure, as a consequence of aggressive immigration law enforcement, rhetoric and messaging designed to encourage self-deportation and the view that non-citizens should not be enumerated.

A basic and important consideration is market research and planning of survey research is to abandon the search for a single suite of “best messages” and messaging dissemination strategy but, rather, to be prepared to design and disseminate varying messages to defined audience segments. The CBAMS research, for example, was well-designed in order to try to provide actionable insights about this. An overarching recommendation is that the analysis be configured to address this objective.

However, it is also clear that quantitative research cannot stand alone in providing sound guidance about overcoming psychological and other barriers to census response and to maximize willingness to respond.

I strongly recommend that the Census 2030 Planning Survey be acknowledged as being simply one component of a broader mixed-methods ongoing research planning process as factors affecting non-citizen response evolve.

My own research in 2018-2019 to examine likely impacts of adding a citizenship question in 2020 in a region with concentrations of Latino immigrants (Kissam et. al, 2019, Wadsworth et al 2019) used a mixed-methods approach and yielded important, and sometimes unexpected, findings about factors entering into a hard-to-count population's willingness to respond to a traditional census or a census with a citizenship question. Although our in-person interviewing was relatively expensive per encounter, it generated responses that included answers to crucial open-ended questions about motivation and clues to effective messaging to promote response.

### **Weighting To Ameliorate Sample Bias in Survey Response from Hard-to-Count Households and Census Tracts**

Simple weighting to conform to the ACS-based demographic profile of the U.S. population and population characteristics is very problematic in smaller analytic cells (e.g. counties, or even tracts). Intra-state variation in self-response (measured at either the community or county level) varied more than inter-state variation in 2020.

Colleagues' and my data analysis of patterns of tract-level self-response in Los Angeles and Fresno counties (Robinson, Kissam, and O'Hare 2023; Kissam and Robinson 2023) provided strong evidence that a number of "structural" factors of local community context were better correlated with census self-response than race/ethnicity (which was, indeed, correlated, but not as well as other factors). Reporting would ideally look at differences in response propensity at the PUMA level.

This implies that weighting to address sample bias in the Census 2030 Planning Survey should not simply seek to weight to account for demographic factors but should also account for other determinants of non-response that are particularly powerful in communities (and clusters of tracts) with relatively high proportions of low-income Hispanic non-citizens.

**Table 1** in the Robinson, Kissam and O'Hare 2023 paper shows that, in addition to Hispanic ethnicity, the following tract-level ACS-derived factors were correlated with non-response: California HTC Score (similar to the Census Bureau's LRS score), % renters in tract, % non-high school graduates, % linguistically-isolated HHs, % HHs in poverty, % HHs with broadband access. The analysis examined self-response patterns at the state level.

Our subsequent analysis of self-response patterns (Kissam and Robinson 2023) in Fresno County showed that % of non-citizens in a tract, and classification of the tracts as urban or rural were also powerful determinants of self-response.

Since the Census 2030 Planning Survey does not include response promotion and the respondent reimbursement of \$5 per interview is insignificant in contemporary society, it is worthwhile to give special attention to the role that broadband access plays in survey response for the HTOP panel as well as the role that % of linguistically-isolated households plays since it is not clear that provisions to accommodate limited-English respondents are effective.

There may already be plans for multi-variable weighting of Census 2030 Planning Survey data but, if not, I strongly recommend weighting based on known correlates of census non-response and the additional considerations stemming from panel recruitment. Subsequently, analysis and reporting of findings should highlight geographic, socioeconomic, and sociopolitical variations.

### **Report Breakout for Factors Affecting Non-Citizen Response**

Since non-citizens, especially Latino non-citizens are at high-risk of response suppression stemming from anti-immigrant rhetoric, aggressive detention tactics, and utilization of administrative records for tracking and detention in enforcement, it would be valuable to include a distinct analysis of factors affecting this very large sub-population's response and recommendations for ameliorating response suppression. This report should include frequencies, cross-tabulations, and analyses for all questions for the sub-sample of non-citizens.

### **Analysis of Specific Questions on the Census 2030 Planning Survey**

It is good to see that the questionnaire includes a number of questions relevant to non-citizens' willingness to respond to the census. They seem relevant and well-framed.

However, some of the questions essentially presume a homogenous U.S. population while, in fact, many immigrants, especially the most recently arrived, may be unfamiliar with issues.

Responses for several questions that presume some level of knowledge about U.S. institutions or, in some cases, citizenship should be analyzed with particular care.

Responses to these questions (for both US citizens and non-citizens) should also be broken out by level of educational attainment (ideally by actual level of educational attainment as Grade 8 or less vs. Grade 9 or higher, not simply HS vs. college as in the Census Bureau's Planning Database).

- Affected variables include: **Qhearcensusaid**, **CenKnow**, for example.
- The coded responses for **TrustFs** do not seem to include a pre-coded response for skipped or don't know. Analysis should, nonetheless, report frequency of skips for this question since many immigrant respondents might well feel they have no basis for assessing "statistics in the U.S."
- **Use 4** (use of census for property tax) should be broken out for renter and homeowners. Renter are unlikely to be aware of this.
- Responses to questions media1-1 through media4-2 should be broken out for limited-English vs. primary English-language speakers to provide an initial sketch for dissemination of messaging.

In general, decennial census promotion has relied too much on mainstream media (which does not reach the sub-populations least likely to respond to the census).

Effective census promotion messaging to ameliorate non-response from households with non-citizens and other known hard-to-count group should include extensive follow up exploration of

media use in these sub-populations. The current survey can at least provide an initial assessment of the extent of non-English messaging needed and clues for effective messaging to less-literate respondents who are part of the hardest-to-count groups.

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