



ASIAN AMERICANS
**ADVANCING
JUSTICE**
AAJC

VIA EMAIL
OIRA_Submission@omb.eop.gov

October 31, 2016

**Re: American Community Survey (ACS) Methods Panel,
Online Communications Improving Survey Response Campaign**
(Document Citations: 81 FR 67957)

Asian Americans Advancing Justice | AAJC (Advancing Justice | AAJC) submits this comment in response to the Department of Commerce's federal register notice requesting comments regarding the American Community Survey (ACS) Methods Panel, Online Communications Improving Survey Response Campaign ("Digital Advertising Campaign"), 81 FR 67957 (October 3, 2016). We offer concrete recommendations for the test to ensure that communities of color are properly engaged and to enhance learnings from the test.

Organizational Information

Advancing Justice | AAJC is a national non-profit, non-partisan organization founded in 1991 with the mission to advance the human and civil rights of Asian Americans, and to build and promote a fair and equitable society for all. Our wide-ranging efforts include promoting civic engagement, forging strong and safe communities, and creating an inclusive society.

Advancing Justice | AAJC works closely with our Community Partners Network, consisting of 156 community-based organizations (CBOs) in 32 states and the District of Columbia. Additionally, Advancing Justice | AAJC is part of Asian Americans Advancing Justice, a national affiliation of five nonprofit organizations in Los Angeles and San Francisco, California, Chicago, Illinois, Atlanta, Georgia, and Washington, D.C.

Advancing Justice | AAJC considers the Census, including the American Community Survey (ACS), to be the backbone of its mission to advance the human and civil rights of Asian Americans and build and promote a fair and equitable society for all. Advancing Justice | AAJC has maintained a permanent census program monitoring census policy, educating policy makers, and conducting community outreach and education to encourage participation in the surveys conducted by the Census Bureau in conjunction with other Advancing Justice affiliates.

The communications team at Advancing Justice | AAJC has more than thirty years of experience in market research, public education campaigns, community outreach, public relations,

marketing, publishing, and digital media. The team engages in an array of activities to capture the attention of audiences ranging from community members to key policymakers across the nation with up-to-date, well-researched positions on issues critical to Asian Americans and the larger civil and human rights community.

Key Concerns with Proposed Digital Advertising Campaign

Demographics of Test

The notice did not note the demographic breakdown by race and ethnicity for the Digital Advertising Campaign being tested. Without this information we cannot ensure that communities of color, especially Asian Americans, are being considered, included, and represented accurately in any tests of new methods to reach the American public about the Census. This test must explicitly include communities of color as we know that these groups represent traditionally hard-to-count communities, many of which continue to experience a persistent digital divide.

We recommend that the test oversample for racial and ethnic groups in order to learn how communities of color (including Asian Americans) will respond to these efforts. Oversampling will be important because without it the test will not provide useful data for different communities of color, especially Asian Americans and smaller population groups. This is particularly problematic for Asian Americans and Native Hawaiian and Pacific Islanders, who comprise vastly diverse racial groups with vastly different internet access rates. Without specific data, some of the most disadvantaged in our communities will be rendered invisible in the test, potentially leaving their critical needs unknown and unmet in new or future outreach activities.

Lack of Clickable Banners

The design of the test groups leaves out an important piece of research. The current methodology assumes that people will not click on banners that contain direct messaging about the Census. Advancing Justice | AAJC recommends creating banners with specific messaging about the 2020 Census and then testing the assumption through the addition of a fourth group. This fourth group would see banners with promotional messages about the Census. This group would test the belief that people will ignore or not click on direct messages about filling out the 2020 Census. This reaction and the responses of this group would be measured in comparison to the high-spend, low-spend, and control groups. As an added bonus, this group might provide insight into what Census advertising may be most effective. This addition would drive toward the specific purpose of the Digital Advertising Campaign, which is to see if people would respond via digital means to complete the 2020 Census. Without this group, there would be no control to see whether Census-specific ads can actually drive people to census materials.



Conclusion

Thank you for this opportunity to comment on the testing of the Digital Advertising Campaign. Advancing Justice | AAJC believes that communications and new technology can be a useful tool in reaching traditionally hard-to-count communities and we look forward to working with the Census Bureau on how best to engage through these mediums. If you have any questions, please feel free to contact me at tminnis@advancingjustice-aajc.org or (202) 296-2300 x127.

Sincerely,



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

