



FOUNDER EMERITUS

Hon. Edward R. Roybal[†]

BOARD OF DIRECTORS

CHAIR

Hon. John Duran
Councilmember,
City of West Hollywood, CA

TREASURER

Hon. Gaddi H. Vasquez
SVP Government Affairs,
Edison International/
Southern California Edison

SECRETARY

Ms. Michelle Mancias, Esq.
Counsel, State Farm

Hon. Mara Candelaria Reardon
Indiana State Representative

Hon. René García
Florida State Senator

Ms. Jessica Herrera-Flanigan
EVP of Government and
Corporate Affairs,
Univision Communications Inc.

Hon. Pauline Medrano
NALEO President,
Dallas County Treasurer, TX

Mr. Rick R. Olivarez, Esq.
Partner,
Olivarez Madruga, LLP

Hon. Alejandra Sotelo-Solis
Councilmember,
City of National City, CA

Ms. Mónica Talán
Chief Mission Officer,
PreK12 Plaza

Mr. Joseph "Pep" Valdes
EVP and Director of
New Business Development,
Parking Company of America

Hon. Peter R. Villegas
NALEO Board Representative,
Commissioner,
Rancho Cucamonga Park
and Recreation, CA

EXECUTIVE DIRECTOR

Mr. Arturo Vargas

[†] deceased

May 30, 2017

Ms. Jennifer Jessup
Departmental Paperwork Clearance Officer
U.S. Department of Commerce
14th and Constitution Avenue NW, Room 6616
Washington, D.C. 20230

Re: Request for comments regarding the 2018 End-to-End Census Test

Dear Ms. Jessup:

On behalf of the National Association of Latino Elected and Appointed Officials (NALEO) Educational Fund, the leading Latino organization in the area of Census policy development and public education, I would like to take this opportunity to provide comments about the Census Bureau's 2018 End-to-End Census Test (hereinafter the "2018 Test"). These comments are in response to the proposed information collection published by the Bureau on March 29, 2017, at 82 FR 15486 (the "Federal Register notice"). The 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 6,100 Latino elected and appointed officials, and include Republicans, Democrats and Independents.

The nation's 56 million Latinos are the country's second largest population group, and more than one of every six of the nation's residents is Latino. Thus, for the Census Bureau to compile the most accurate data possible about the U.S. population, it must ensure a full and accurate count of the Latino community. While the Bureau has made progress in reducing the differential undercount of different population groups, the differential undercount of Latinos persists, and was 1.5% in Census 2010. In addition, research by demographer Dr. William O'Hare found that the 2010 Census did not count 400,000 very young Latino children (under age 5). The research also revealed that the net undercount rate for young Latino children was 7.1 percent in Census 2010, compared to 4.3 percent for non-Hispanics

As the Bureau has recognized, the 2018 Test is the last major test before Census 2020 and is a crucial component of the Bureau's preparation for the 2020 decennial enumeration. The Bureau's decisions about all aspects of the 2018 Test will have a critical impact on the accuracy of the data compiled on Latinos and the nation's other racial and ethnic population groups, including the detailed data compiled on Latino national origin and sub-groups.

www.naleo.org

National Office	Houston	Orlando	New York	Washington, DC
1122 W. Washington Blvd., Third Floor Los Angeles, CA 90015 Tel: (213) 747-7606 Fax: (213) 747-7664	1314 Texas Avenue, Suite 410 Houston, TX 77002 Tel: (713) 228-6400 Fax (713) 228-0606	5950 Lakehurst Drive, Suite 169 Orlando, FL 32819 Tel: (321) 795-3757	55 Broad Street, Suite 9B New York, NY 10004 Tel: (212) 480-1918 Fax: (212) 480-1697	600 Pennsylvania Ave., SE Suite 230 Washington, DC 20003 Tel: (202) 546-2536 Fax: (202) 546-4121

v. 1/15

NALEO.ORG
@NALEO
213.747.7606

LOS ANGELES, CA
1122 W. Washington Blvd., Third Floor
Los Angeles, CA 90015

HOUSTON, TX
1415 N. Loop W Fwy, Ste. 1020
Houston, TX 77008

NEW YORK, NY
55 Broad St., Ste. 9B
New York, NY 10004

ORLANDO, FL
5950 Lakehurst Dr.
Orlando, FL 32819

WASHINGTON, D.C.
600 Pennsylvania Ave. SE, Ste. 480
Washington, DC 20003

The 2018 Test will build on the Bureau's past research to further evaluate several potential changes to the Bureau's enumeration approaches, including: the use of a strategy intended to optimize self-response by encouraging respondents to complete the enumeration questionnaire online; the use of a combined question on race and Hispanic origin; refinement of the Bureau's support for respondents who are not yet fully fluent in English; operational and technological improvements for Nonresponse Followup (NRFU); and the Update Enumerate (UE) operation.

In this letter, we provide recommendations regarding several different components of the 2018 Test as well as other issues affecting the Bureau's activities which have an impact on the enumeration of the Latino community.

I. Internet/Technology Response Option

Internet and mobile-phone use by Latinos: We believe that providing a means for electronic response could potentially increase participation rates for some residents while holding down costs, and would be consistent with the growing use of new technology in a variety of governmental operations. Thus, we are looking forward to the 2018 Test's evaluation of both the "Internet First" and the "Internet Choice" response options, together with the assessment of household contact strategies to encourage self-response. While we are mindful that the "digital divide" is narrowing within our nation, disparities still exist in broadband use and the presence of computers in households of different racial/ethnic and socio-economic groups. In addition, in many rural areas of the country, Internet or broadband access is not available, and Latinos in these areas are likely to face challenges with answering an online survey. We also note that many Latinos use mobile devices to access the Internet, and effective mobile device-based response capabilities could significantly strengthen the Bureau's ability to reach Latino residents. In light of the foregoing, we urge the Bureau to assess several issues as it evaluates the Internet response options in the 2018 Test:

- The extent to which self-response rates overall vary between Latinos based on a wide range of demographic characteristics, including geography, age, national origin and sub-group, and language used when accessing the Internet. This evaluation should include a thorough examination of the demographic characteristics of those who choose to initially respond using a paper questionnaire, and those whom the Bureau must attempt to reach through NRFU.
- The extent to which the Bureau's measures of low Internet connectivity or low Internet usage rates are effective guides for the delivery of paper questionnaires to households.
- The extent to which Latinos respond using computers compared to mobile devices, and the demographic characteristics of those who use different modes of response.
- The extent to which heads of households receive assistance from other household members in utilizing the different technological response modes. As is the case with other population groups, Latino youth are generally more comfortable with new technology than older Latinos, and it would be useful to understand the extent to which older household members obtain assistance from younger ones in completing the questionnaire through the Internet.

Finally, it is important that efforts to take advantage of new technology for a more efficient and cost-effective Census do not leave Latinos and other traditionally harder-to-count communities behind. We commend the Bureau for evaluating the “Internet Choice” option, and we urge the Bureau not to view the Internet response option as a replacement for paper-based questionnaires, and in-person enumerator follow-up.

Need for multilingual Internet response contact strategies and materials: We understand that the 2018 Test will examine expanded language capabilities and support to further the goal of optimizing self-response. We commend the Bureau for its recognition of the importance of refining its support for and communication with Latinos who are not yet fully fluent in English, because these Latinos need specialized strategies to promote their self-response. With respect to telephone support, we recommend that the Bureau include a mechanism to evaluate customer satisfaction with the bilingual assistance the Bureau provides.

II. Evaluation of Combined Question on Hispanic origin and Race

The 2018 Test will evaluate a combined question on Hispanic origin and race that is similar to a design strategy used in its 2015 National Content Test (NCT) which included detailed checkboxes for the reporting within different race/ethnicity categories. Based on the 2015 NCT and the Bureau’s 2010 Alternative Questionnaire Experiment results, we believe the foregoing approach shows promise for improving the completeness and accuracy of responses from Latinos and other diverse racial and ethnic communities. We have attached a *Policy Brief* which sets forth our perspectives and recommendations on this issue. In summary, as the Bureau evaluates the results of the 2018 Test, we urge the agency to continue to be mindful of the following:

- The extent to which the combined question format improves the level of overall race/ethnicity reporting as well as detailed reporting for specific Latino national origin and sub-groups.
- The impact on the combined question format on the reporting of Latinos who choose to identify with multiple major race/ethnic categories (such as Latino and Black), as well as those who choose to identify with multiple detailed categories (such as Mexican and Dominican).

We also commend the Bureau for recognizing that the 2018 Test should further evaluate some issues that arise from the use of a combined question design strategy as a replacement for the “two separate questions” approach in Census 2010. For example, insofar as the Bureau’s design strategy continues to include a “some other race, ethnicity or origin” category, the Bureau will still need to carry out imputation procedures to ensure comparability between Census data and the Office of Management and Budget’s (OMB) federal data standards, which do not include this category. Based on the Bureau’s NCT research, the number of individuals who choose this category should be significantly smaller than those who indicated being “Some other race” in Census 2010. However, we are encouraged to see that the Bureau will examine which procedures yield the best imputation results in the 2018 Test. In addition, the Bureau should

closely examine the characteristics of respondents who chose the “Some other race, ethnicity, or origin,” category to guide its work on this issue.

We also commend the Bureau for recognizing the importance of data products and dissemination as a critical objective of the 2018 Test, and for producing prototypes of these products as part of the Test. Thus, we urge the Bureau to assess how it will tabulate and report data based on responses to a combined question. For example, use of a combined question may increase the percentage of survey respondents who accurately report belonging to more than one major race or ethnicity category. Under some circumstances, the Census Bureau reports these data in one single “two or more races” category. However, if the combined question approach increases the diversity of responses by individuals who identify with more than one race or ethnicity, then presenting data on those individuals in a single category may not be an optimal approach.

Moreover, as the Bureau collects multiple responses indicating both membership in broad race and ethnicity categories and membership in smaller national origin, ethnic, and tribal groups, the Bureau will possess information about individuals’ backgrounds that may be very complex and include many details. The Census Bureau must decide, and clearly communicate, the level of detail it can feasibly make available in various products and publications, striving to provide as much precise data as possible. To the extent possible consistent with sound statistical practices, the Bureau should also disaggregate these data by the different individual national origin and other ethnic groups.

In addition, the Bureau must develop plans to ensure the comparability of data to historical statistics. With two separate questions on Hispanic origin and race, the Bureau has been able to present data on Latinos which also categorizes Latinos by race - either the specific racial category selected by Latino respondents, or the category the Bureau assigned the Latino respondent if he or she did not choose one of those specific categories.

However, with the combined question approach, there is likely to be a significant number of respondents who indicate that they self-identify solely as Latino. Thus, there would be no presentation of other specific “racial” categories for these respondents. While this approach may more closely reflect the self-identification of Latinos, it creates challenges for the comparability of data collected under the combined question approach and the separate questions approach. Thus, the Bureau may need to plan for and allocate resources to adapt old or new datasets for comparability, or consider developing tools that enable data users to convert old and new datasets into a common format.

III. NRFU and Use of Administrative Records

The 2018 Test will examine several technological improvements and operational procedures for conducting NRFU. In light of the 2018 Test’s emphasis on the Internet response option, traditionally harder-to-count populations may be even more likely to require NRFU than they would in a paper-based enumeration. In some cases, these residents live in areas that do not have Internet access, such as rural areas or those with non-traditional housing. Some also cannot

afford Internet access or lack the skills or information needed to navigate the online questionnaire. Thus, in general, we urge the Bureau to examine the overall effectiveness of the 2018 Test's NRFU technological improvements and operational approaches in reaching and improving the quality of data collected on harder-to-count populations.

The 2018 Test will evaluate several operational approaches that affect the deployment of field enumerators. We recommend that the Bureau ensure that the field workforce for the 2018 Test reflect the racial, ethnic and linguistic diversity of the sites in which the Test is being conducted, and that field employees have the language skills and cultural competency needed to reach harder-to-count populations. This is particularly important in light of the fact that two of the 2018 Test sites have significant Latino populations – Providence County, Rhode Island (21%) and Pierce County, Washington (10%).

The challenges which arose in the Rio Grande Valley and *colonias* in Census 2010 help demonstrate the importance of the Bureau deploying a diverse workforce in the 2018 Test. The challenges occurred as a result of miscommunication between the Bureau's regional office and local leaders regarding the enumeration method that would be used. Ultimately, the Bureau and local, regional and national partners came together to implement a strategy to address these challenges. However, one issue that emerged during these efforts was the lack of bilingual field staff assigned to work with or collect data from limited-English proficiency residents, including staff who possessed the requisite knowledge and culture of the immigrant community and families in the area.

As noted above, there are special challenges in reaching and engaging rural residents during the decennial enumeration, and the Bureau's operational innovations may make the challenges more acute. Some of these residents live in areas which lack Internet access, do not have "city-style" street addresses, or lack transportation infrastructure. Some are seasonal workers. The 2018 Test provides an opportunity to evaluate strategies to hire and deploy NRFU employees who can effectively reach Latino residents in rural areas. The Bureau should also utilize the 2018 Test to assess the impact of other operational components on its ability to obtain accurate data about Latinos in rural areas, including the UE operation, and the Test's partnership efforts.

In addition, we note that the Bureau will continue to evaluate the efficacy of automated data collection during NRFU, and make field data collection instruments and materials available in both English and Spanish. The Bureau should work with enumerators and other members of its workforce to evaluate the usability of automated NRFU devices and the related software applications by diverse employees. The Bureau should also examine the effectiveness of Spanish-language instruments and materials for enhancing NRFU within Latino communities.

The Bureau will also use NRFU during the 2018 Test to assess enumerators' experience with the field enumeration instrument and their navigation of the combined Hispanic origin and race question. The Bureau should use this opportunity to examine whether Latino respondents understand the purpose of the question, the question's instructions, and whether respondents understand that they can choose multiple major and detailed race/ethnicity categories. This

examination is particularly important for determining how Spanish-dominant residents interpret the question, since many of them may not be familiar with the terms used.

During its 2018 Test NRFU operations, the Bureau will also assess its procedures for interviewing proxy respondents to gather information from hard-to-enumerate households. As is the case with its evaluation of Internet responses, the Bureau should examine the extent to which young Latinos provide assistance to or serve as proxies for the heads of households during NRFU. Young Latinos may have greater English-language proficiency than older household members, and it will be useful to understand the role they play in providing household responses during NRFU.

In the 2018 Test, the Bureau will continue to refine its NRFU methods for enumerating multi-unit structures, to assist in identifying vacant households with a minimal amount of contact attempts, to minimize burden on respondents. In light of the fact that many Latinos are extremely mobile or live in non-traditional housing, we urge the Bureau to examine the impact of these NRFU refinements on reaching Latino households and obtaining an accurate count of their members.

We also note that the Bureau has already developed the basic architecture of its strategy to use administrative records to assist in NRFU operations, and that the 2018 Census test will primarily examine further refinements to that strategy. We have consistently expressed our concerns about the quality, consistency, and accuracy of administrative records, especially with respect to detailed information about race, ethnicity and household relationships. We also believe that information in administrative records about harder-to-count populations may be less complete, accurate and up-to-date than the information about other populations. This results in part from the fact that many residents in harder-to-count populations are extremely mobile, live in non-traditional housing, and have lower incomes than the overall population. Moreover, we remain concerned that Latino residents may be underrepresented in administrative records under consideration for use in Census enumeration, including very young Latino children.

As the Bureau evaluates its refinements to its administrative records strategy, we urge the agency to be mindful of any use of the records that would create disparate results for traditionally hard-to-count communities, or diminish the quality or accuracy of data on the Latino community. We also urge the Bureau to continue to communicate with Latino stakeholders about the proposed use of administrative records, and obtain their feedback as the agency finalizes its operational plans. In addition, as the Bureau trains its field enumerators, it should educate them about the fact that part of their role is to ameliorate some of the potential limitations in the use of administrative data. The Bureau should empower enumerators to alert the Census Bureau of instances where information based on administrative records does not match their observations, which could help alert the Bureau to potential systemic issues with the generation or use of such information.

IV. Group Quarters

The Bureau will use the 2018 Test to assess several components of its Group Quarters (GQ) operations, including Advance Contact strategies, Service-Based Enumeration, and Group Quarters Enumeration (GQE). Census staff and field enumerators will be involved in several aspects of the GQ operations, including obtaining pre-enumeration information from institutions, and conducting GQE. As is the case with NRFU, we urge the Bureau to deploy a diverse workforce for these tasks, with staff that have the linguistic skills and cultural competency needed for effective outreach to and enumeration at the GQ institutions. We also note that GQE will involve different modes of enumeration, including electronic response and paper-based enumeration. The Bureau should assess whether the type of response mode affects the accuracy of information obtained about Latinos and other harder-to-count GQ residents. Similarly, to the extent that GQE involves enumeration of group homes or other residential institutions which house very young Latino children, the Bureau should examine whether specific GQE strategies can help ameliorate the undercount of this population.

V. Realignment of Regional Offices

We believe the 2018 Test offers the Bureau an opportunity to continue to assess the impact of its 2012 realignment of its regional office structure on its partnerships with local stakeholders. The Bureau's reduction of the number of regional offices from 12 to six has expanded the size of the regions served. In addition, as a result of the realignment, the Bureau closed its Seattle regional office and transferred its responsibilities to Los Angeles, which now serves California, Alaska, Hawaii and the Pacific Northwestern states. The Bureau also closed its Boston office (which formerly served Rhode Island and other Northeastern states), and transferred its responsibilities to New York, which now serves all of the Northeast area. Thus, both the Pierce County and Providence County 2018 Test sites will be served by regional offices which are geographically more distant than the offices in Census 2010. In addition, the Los Angeles and New York offices serve significantly more populous regions than the Seattle and Boston offices served. Thus, the 2018 Test will provide an opportunity to specifically examine the relationship of the Los Angeles and New York offices with local partners at the test sites. The evaluation will also help the Bureau design and implement plans in preparation for the 2020 Census that take into account how the realignment will affect outreach by all regional offices.

VI. The Need for Adequate Resources for the 2018 Test and Census 2020 Preparations

NALEO Educational Fund is profoundly concerned that the level of Census funding provided in FY 2017, and the level proposed in the Administration's FY 2018 budget request, will not provide the resources needed for a fair and accurate count of the nation's population in Census 2020. The Census Bureau has already scaled back or eliminated certain important components of its Census 2020 preparations. For example, the agency eliminated two 2017 field tests, including the 2017 Puerto Rico Test. The 2017 Puerto Rico Test would have provided the Bureau with an opportunity to assess many of its proposed operational changes in areas with

primarily Spanish-dominant Latinos, and the test results would have informed the Census 2020 enumeration of the Island's residents as well as Puerto Ricans living on the U.S. mainland.

For example, the 2017 Puerto Rico Test would have included an UE component. Under UE operations, households which have certain demographic and housing characteristics do not receive any information or explanation about Census participation through the mailings that will go to residents who can use the Internet response operations. Thus, for effective UE operations, the Bureau must work closely with community stakeholders who will be educating and engaging residents to respond to the Census, and the 2017 Puerto Rico test would have provided an opportunity to assess the role of such partnerships in promoting sound UE operations. While the 2018 Test will include a UE component, the 2017 Puerto Rico test would have provided more robust information about how to implement UE in Latino communities throughout the nation. The Bureau has indicated that it may move the Puerto Rico test sites included in the 2017 test to the 2018 Test; however, it does not appear that this would be likely or feasible under the level of funding provided in the President's FY 2018 budget request.

In addition, as a result of funding constraints, the Bureau has paused or delayed several operational components that are critical to achieving an accurate Census 2020 enumeration of Latinos and other hard-to-count populations. These components include the Bureau's advertising and communications efforts and partnership program. The Bureau will not conduct a communications campaign in the 2018 Test, and it has delayed the opening of three Regional Census Centers.

In light of the technological and operational innovations the Bureau intends to implement in Census 2020, robust and effective communications and partnership efforts are crucial to educate Latinos about how to participate in Census 2020 and ensure that the Latino community understands the different options available for participation. NALEO Educational Fund has consistently urged the Census Bureau to maintain and strengthen the Partnership Program to achieve this important goal. The Bureau's Partnership Program was an integral component of 2010 Census outreach efforts, and helped engage harder-to-count populations in the enumeration. The program helps keep national, state, and local stakeholders fully informed about prospective design changes for the 2020 Census, as well as ongoing efforts to preserve a robust American Community Survey (ACS) and other important demographic and socio-economic surveys. In addition, maintaining and strengthening the network of stakeholders in the program will help ensure their full engagement in the outreach efforts for the 2020 enumeration and other surveys.

Effective Integrated Communications and Partnerships efforts are also essential to ameliorating the undercount of very young Latino children. The Bureau must incorporate messaging in its communications campaign to ensure that individuals completing the census forms include all household members, including very young children, in their responses. It must also engage partners who work closely with Latino families, such as institutions which reach new or expectant Latino mothers, community organizations, and public assistance programs.

Moreover, in the Federal Register notice, the Bureau acknowledges that with respect to its assessment of the combined question, it needs to understand “whether or not respondent privacy concerns and expectations for data protection are addressed and the process is trusted by the general public.” The absence of a communications effort for the 2018 Test represents a lost opportunity for the Bureau to evaluate the role of such an effort in building public trust in the privacy and confidentiality of information provided to the Census Bureau. This issue is particularly salient in light of the current technology environment in the nation. Cybersecurity risks and breaches have generated significant public attention, and many residents are likely to have serious concerns about the confidentiality of information submitted to the Bureau through the Internet.

In addition, our nation continues to engage in a divisive dialogue about its immigration policy. The Administration has also engaged in aggressive immigration enforcement activities, and immigrants, many of whom are Latino, are fearful of contact with government officials. Many are also concerned that information provided to government agencies will result in immigration enforcement actions targeted at their families or communities.

To effectively engage Latinos and all U.S. residents to participate in Census 2020, the federal government must ensure that none of its policies undermine the confidentiality and privacy of information provided in the Census. The Census Bureau will also have to conduct effective communications activities and work with partners who are trusted by the Latino community to address concerns about how the Bureau will use the information provided to it. Delaying the Integrated Partnerships and Communications efforts will significantly impair the ability of the Bureau to achieve this goal.

NALEO Educational Fund is also extremely concerned about the Bureau’s plans to eliminate or reduce the scope of the Census Coverage Measurement (CCM) Operation for the 2018 Test. The CCM would provide invaluable information about the overall effectiveness of the Bureau’s operational and technological enhancements. The CCM would enable the Bureau to determine 2018 Test measures of coverage error in the 2018 Test for different demographic groups and geographic areas, as well as similar measures for different operational components. The process of determining these measures would also provide the Bureau with a deeper understanding of any methodological or statistical issues which might arise when it deploys new operational approaches in Census 2020. We believe that the absence of a sound CCM operation in the 2018 Test will significantly impair the ability of the Bureau to prepare for and carry out an accurate count of the population in Census 2020.

Ultimately, Congress must provide the Bureau with the ramp up in funding that will enable the Bureau to sustain timely and thorough preparations for Census 2020, including the 2018 Test. The President’s FY 2018 budget request is inadequate to achieve the ramp up the Bureau needs. Congressional failure to approve a significantly more robust level of funding would impede crucial operations designed to improve accuracy in the Latino and other historically undercounted communities. The U.S. Constitution requires an accurate enumeration of all Americans every 10 years, and Congress is responsible for ensuring that outcome. To carry out

Ms. Jessica Jessup

May 30, 2017

Page 10

this Constitutional mandate effectively, Congress and must provide the Bureau the resources needed for a fair and accurate count in Census 2020.

VII. The Nomination and Confirmation of a Highly Qualified Census Bureau Director

With the resignation (effective June 30, 2017) of current Census Bureau Director John Thompson, the agency faces a leadership vacuum less than a year before the 2018 Test and less than three years before the start of Census 2020. Failure to fill this vacancy quickly could delay final design decisions, impair preparations for Census 2020, and impede the sound implementation of other Census programs, such as the ACS and the 2017 Economic Census. The Census Bureau requires an established leader who will provide stability through the final years of this decade, address Congress's fiscal concerns, and be ready for full immersion in the important tasks at hand. The candidate for this position also must meet the qualifications set forth in the Presidential Appointment Efficiency and Streamlining Act of 2011, which envisions a nonpartisan candidate with "demonstrated ability in managing large organizations and experience in the collection, analysis, and use of statistical data." Thus, we urge the prompt nomination and confirmation of a highly qualified and widely respected professional to serve as the next Director of the Census Bureau – an individual who possesses the skills and expertise the position requires, and who will garner the trust and confidence of policymakers, the Census Bureau's professional staff, stakeholders and the public at large.

Should you have any questions about our comments, please contact Rosalind Gold, Senior Director of Policy, Research and Advocacy, at 213-747-7606, or rgold@naleo.org. Thank you for your consideration of our views.

Sincerely,



Arturo Vargas
Executive Director

cc: Congressional Hispanic Caucus
Congressional Hispanic Conference



POLICY BRIEF

The Census Bureau's Proposed "Combined Question" Approach Offers Promise for Collecting More Accurate Data on Hispanic Origin and Race, but Some Questions Remain

The Importance of Accurate Census Data for the Latino Community

The accuracy of the data collected by the Census Bureau on the nation's population, and on its racial, ethnic and national origin groups, helps ensure our nation's future prosperity and well-being. These data guide a wide range of decisions made in the public and private sectors that affect the lives of Latinos and all American families and their children. The data help ensure fair and representative reapportionment and redistricting for Latino communities. Census data play an indispensable role in the monitoring and implementation of civil rights policies, and they are used to allocate billions of dollars in federal, state and local funding.

Latinos are the nation's second largest population group, and one of its fastest growing communities. Latinos account for more than one of every six U.S. residents, and one of every four of the country's population under 18. For the Census Bureau to compile the most accurate data possible about the U.S. population, it must ensure a full and accurate count of the Latino community.

For Census data to present an accurate portrait of our Latino population, they must reflect the on-going evolution of Americans' racial and ethnic identity. The Census Bureau has undertaken a comprehensive evaluation to determine whether changes to the wording and format of its questions on Hispanic origin and race would improve the accuracy of the responses it receives.

The Office of Management and Budget Standards for Federal Data on Race and Ethnicity:

The Census Bureau collects data on race and ethnicity in accordance with standards for federal data established by the Office of Management and Budget (OMB). Federal data on race and ethnicity serve two crucial purposes that are particularly important for the Latino community. The data reveal persistent disparities rooted in historic discrimination premised on race and ethnicity, and they enable efforts to eliminate those disparities.

In 1997, the OMB undertook a major revision of its classification standards, and adopted an approach which defined two ethnicity categories - Latino, or not Latino. The standards required that race be measured separately from these ethnicity categories, and defined five minimum race categories - generally, White, Black, American Indian/Alaska Native, Asian, or Native Hawaiian/Pacific Islander.

The Census “Two Separate Question” Approach to Hispanic Origin and Race

Beginning in 1970, the Census included separate questions on Hispanic identity and racial identity in its questionnaires. Research in the 1990s showed that the government derived much better data with two separate questions than a combined question. In addition, the Census questions on Hispanic origin and race continued to evolve after the OMB revised its standards and established two ethnicity categories and five minimum race categories.

The 2010 Census questions reflect the “two separate question” approach to obtaining responses on Hispanic origin and race. The questionnaire first asked individuals to indicate whether or not they were of Hispanic origin, followed by a separate question asking respondents to indicate their race. Respondents were provided five general race categories: White; Black; American Indian or Alaska Native; a selection of nine specific large Asian and Native Hawaiian or Pacific Islander subgroups, with two additional write-in boxes for “Other Asian” and “Other Pacific Islander; and “Some other race.” Respondents could also select one or more race (Figure 1)

Figure 1

→ NOTE: Please answer BOTH Question 8 about Hispanic origin and Question 9 about race. For this census, Hispanic origins are not races.

8. Is Person 1 of Hispanic, Latino, or Spanish origin?

☐ No, not of Hispanic, Latino, or Spanish origin

☐ Yes, Mexican, Mexican Am., Chicano

☐ Yes, Puerto Rican

☐ Yes, Cuban

☐ Yes, another Hispanic, Latino, or Spanish origin — *Print origin, for example, Argentinean, Colombian, Dominican, Nicaraguan, Salvadoran, Spaniard, and so on.* ↴

9. What is Person 1's race? Mark ☒ one or more boxes.

☐ White

☐ Black, African Am., or Negro

☐ American Indian or Alaska Native — *Print name of enrolled or principal tribe.* ↴

<input type="checkbox"/> Asian Indian	<input type="checkbox"/> Japanese	<input type="checkbox"/> Native Hawaiian
<input type="checkbox"/> Chinese	<input type="checkbox"/> Korean	<input type="checkbox"/> Guamanian or Chamorro
<input type="checkbox"/> Filipino	<input type="checkbox"/> Vietnamese	<input type="checkbox"/> Samoan
<input type="checkbox"/> Other Asian — <i>Print race, for example, Hmong, Laotian, Thai, Pakistani, Cambodian, and so on.</i> ↴		<input type="checkbox"/> Other Pacific Islander — <i>Print race, for example, Fijian, Tongan, and so on.</i> ↴

☐ Some other race — *Print race.* ↴

→ If more people were counted in Question 1, continue with Person 2.

Reasons for the Census Bureau's Redesign of Hispanic Origin and Race Questions

The mismatch between Latino identification and the Census race categories:

As part of its effort to increase the reliability of responses and to increase census response rates, the Census Bureau continuously examines the format and wording of the Hispanic origin and race questions. The Bureau has long recognized a growing mismatch between the specific categories set forth in the race question and the ways in which many Latinos express their racial and ethnic background. The Bureau has consistently found that Latinos account for majorities of people who do not report themselves as belonging to any of the specific race categories. For example, more than 43% of Latinos chose "Some other race" or did not answer the race question on the 2010 decennial Census. Of those who chose "Some other race" and wrote in the race with which they identified, an overwhelming majority answered "Mexican," "Hispanic," "Latin American," or "Puerto Rican," which suggests they did not identify with the specific racial groups set forth in the question.

Consistency between Census data and OMB categories:

The relatively high number of Latinos who do not identify with the specific racial categories set forth in the Census question also presents a major challenge for the consistency of Census data with race and ethnic categories established by the OMB. Because the OMB minimum race categories do not include "Some other race," the Bureau has developed a procedure to assign an OMB race to those checking "Some other race" in response to the Census question. The procedure relies on assessment of the demographic characteristics of these respondents and their family members and neighbors, and the Bureau uses it for post-Census calculations and products, such as population estimates.

Between 2000 and 2010, the population classified as "Some other race" grew by one-quarter. By 2010, 6% of all decennial Census respondents – 19.1 million people – identified themselves as "Some other race," and 97% of those 19.1 million individuals were Latino. Latinos aged 18 to 44 are statistically more likely than their older counterparts to answer "Some other race" or to provide no answer to a separate Census question about race. The Census Bureau expects that by 2020, "Some other race" could become the second largest racial group reported in the Census.

Missing information about detailed national origin:

Finally, the Census Bureau's research around alternate Hispanic origin and race question design has been motivated by the goal of collecting more accurate detailed data about Latino national origin and sub-groups. The separate-question format employed in the 2010 decennial Census did not accommodate the reporting of multiple national origins by respondents of Latino ethnicity. However, evidence indicates that inability to record and report multiple Hispanic national origins results in the loss of detailed information about Latino identities. For example, in response to a differently-formatted ethnicity question on the 2000 decennial Census, the Bureau observed that more than 260,000 respondents attempted to report multiple Latino national origins, and that such reporting was most common among respondents under the age of 35, portending future increases in the percentages of Latinos identifying as being of more than one Latino national origin.

The Census Bureau's 2010 Research on the Hispanic Origin and Race Questions

The Census Bureau's research to enhance its collection of race and ethnicity data includes its Alternative Questionnaire Experiment (AQE), which was conducted during Census 2010 to test a number of different questionnaire design strategies. During the 2010 enumeration, the Bureau mailed out questionnaires with several different experimental variations in the design strategies for the Hispanic origin and race questions.

The Bureau also conducted interviews and focus groups with respondents, which revealed that some Latinos struggled to answer a separate question about race, and were not necessarily satisfied with the answers they had given. This research indicated that a number of Latinos reported their race as White to the separate race question because they did not see themselves represented among the other options in the race question and felt forced to choose a race category. The Bureau found that significant numbers of Latinos did not embrace or express any identity other than that stemming from their Latino and specific national origin heritage – in other words, Latino was equivalent to these individuals' "race." However, the Bureau also found that some survey respondents strongly resist the equating of nationality or ethnicity to race, and insisted on the importance of distinguishing between geographic origins and pan-national racial classifications.

In addition, the Census Bureau's research raised concerns about how non-Hispanic individuals responded to the questions on Hispanic origin and race. For example, some non-Hispanics did not respond to the separate Hispanic origin question, because they did not feel it applied to them or believed they had answered the question when responding to the question on race.

Survey participants also told the Census Bureau that they were skeptical or suspicious of the motives for asking a separate question that sought only to identify people with Latino ethnicity, for various reasons. Some individuals worried that the question enabled the discriminatory treatment of people who denoted themselves as Hispanic or Latino. At the same time, some members of the public saw the question as unfair because it could lead to provision of special, preferential treatment to Latinos. In either case, survey subjects perceived Latinos being counted differently than other groups of Americans because Latino ethnicity was the sole topic of a dedicated question.

The Census Bureau's 2015 Research on the Combined Race and Ethnicity Question Approach

In addition to the 2010 AQE, the Bureau undertook a comprehensive 2015 evaluation of the content of the Census questionnaire - the 2015 National Content Test (NCT). The 2010 AQE and the 2015 NCT sought to determine what question format would achieve the most in terms of decreasing nonresponse, increasing reporting within the OMB-recognized race and ethnicity categories, eliciting detailed reporting of Latino national origin and sub-groups, and increasing accuracy and reliability of results.

The Census Bureau's research appears to demonstrate that a single combined question on race and ethnicity accompanied by detailed checkboxes best achieves the foregoing goals (Figure 2).

Figure 2

8. Which categories describe Person 1?
 Mark all boxes that apply **AND** print details in the spaces below.
 Note, you may report more than one group.

☐ **WHITE** – Provide details below.

<input type="checkbox"/> German	<input type="checkbox"/> Irish	<input type="checkbox"/> English
<input type="checkbox"/> Italian	<input type="checkbox"/> Polish	<input type="checkbox"/> French

Print, for example, Scottish, Norwegian, Dutch, etc.

☐ **HISPANIC, LATINO, OR SPANISH** – Provide details below.

<input type="checkbox"/> Mexican or Mexican American	<input type="checkbox"/> Puerto Rican	<input type="checkbox"/> Cuban
<input type="checkbox"/> Salvadoran	<input type="checkbox"/> Dominican	<input type="checkbox"/> Colombian

Print, for example, Guatemalan, Spaniard, Ecuadorian, etc.

☐ **BLACK OR AFRICAN AM.** – Provide details below.

<input type="checkbox"/> African American	<input type="checkbox"/> Jamaican	<input type="checkbox"/> Haitian
<input type="checkbox"/> Nigerian	<input type="checkbox"/> Ethiopian	<input type="checkbox"/> Somali

Print, for example, Ghanaian, South African, Barbadian, etc.

☐ **ASIAN** – Provide details below.

<input type="checkbox"/> Chinese	<input type="checkbox"/> Filipino	<input type="checkbox"/> Asian Indian
<input type="checkbox"/> Vietnamese	<input type="checkbox"/> Korean	<input type="checkbox"/> Japanese

Print, for example, Pakistani, Cambodian, Hmong, etc.

☐ **AMERICAN INDIAN OR ALASKA NATIVE** – Provide details below.

<input type="checkbox"/> American Indian	<input type="checkbox"/> Alaska Native	<input type="checkbox"/> Central or South American Indian
--	--	---

Print, for example, Navajo Nation, Blackfeet Tribe, Mayan, Aztec, Native Village of Barrow Inupiat, Nome Eskimo Community, etc.

☐ **MIDDLE EASTERN OR NORTH AFRICAN** – Provide details below.

<input type="checkbox"/> Lebanese	<input type="checkbox"/> Iranian	<input type="checkbox"/> Egyptian
<input type="checkbox"/> Syrian	<input type="checkbox"/> Moroccan	<input type="checkbox"/> Algerian

Print, for example, Israeli, Iraqi, Tunisian, etc.

☐ **NATIVE HAWAIIAN OR OTHER PACIFIC ISLANDER** – Provide details below.

<input type="checkbox"/> Native Hawaiian	<input type="checkbox"/> Samoan	<input type="checkbox"/> Chamorro
<input type="checkbox"/> Tongan	<input type="checkbox"/> Fijian	<input type="checkbox"/> Marshallese

Print, for example, Palauan, Tahitian, Chuukese, etc.

☐ **SOME OTHER RACE, ETHNICITY, OR ORIGIN** – Print below.

NALEO Educational Fund agrees with the Bureau's careful assessment. First, the Census Bureau's extensive testing has repeatedly achieved lower nonresponse rates to combined than to separate questions. "Some other race" responses also decline dramatically when a combined question is substituted for separate race and ethnicity questions. Whereas the Bureau conducted the AQE solely on paper, it tested responses received both on paper and through the internet in the NCT. In addition, while the AQE tested questions only in English, the NCT tested them in both English and Spanish. This testing confirmed that a combined question resulted in lower nonresponse rates regardless of the medium used to answer the questionnaire, or whether respondents used English- or Spanish-language questionnaires.

The Census Bureau also observed that combining race and ethnicity questions in the AQE and NCT led fewer Latinos to choose White as their race, and instead resulted in majorities of Latinos self-identifying solely in the Latino/Hispanic category and not with any of the other specific racial groups in the existing Census question. Latino NCT respondents were more likely overall to convey their Latino ethnicity in response to a combined question than if they received a questionnaire with separate race and ethnicity questions.

The Bureau also examined the consistency between respondents' answers to various question formats and the ways in which they self-identify through focused interviews with individuals. These interviews also supported the Bureau's contention that combined question formats are a better approach than separate questions to eliciting how Latinos define themselves.

Finally, when checkboxes and an optional write-in area immediately follow broad race and ethnicity categories, a combined question is as effective as separate questions in prompting survey respondents to provide detailed information about their national origins and ethnicities. This result holds true for most racial and ethnic classifications, except with respect to the Bureau's attempted use of three very broad geographic checkboxes to elicit detailed reporting from American Indian and Alaska Native respondents on paper questionnaires. The Bureau must revisit alternative format approaches to address this issue.

Results of the AQE and NCT indicate that the adoption of a combined question format will not result in the loss of any necessary data that would have been collected with separate questions. For example, the Census Bureau did not find any statistically significant differences in the rates at which respondents indicated Afro-Latino identity whether they were responding to separate or combined questions. Similarly, the percentage of people who self-identified as both Latino and White in a combined question – about 15% of all Latinos – was consistent with the percentage of Latinos who affirmed their White identity in a post-survey interview associated with questionnaires that employed separate questions. As noted, combined questions produce no decline, and instead a slight increase, in the percentages of survey respondents identifying as Latino. In sum, Latinos provide the most accurate reports of their self-identification in response to a combined question, whether or not they identify with one or more of the specific categories set forth in the Census race question.

In addition, the combined question design strategy proposed by the Bureau shows promise for collecting more accurate and nuanced data on Latinos who identify with more than one national origin or sub-group. The initial instructions for the combined question direct respondents to mark all categories that apply, and respondents who indicate they are Latino can check more than one of the checkboxes for the national origin or sub-groups listed, as well as writing in other national origins where indicated. The 2010 Census question on Hispanic origin did not permit the reporting of multiple Latino national origin or sub-groups.

Prospective benefits of combined question format extend beyond the Latino community:

The Bureau also found that it collected the most detailed and complete responses from people of all races and ethnicities when it queried them using a single question with detailed checkboxes. Secondary interviews conducted after circulation of the questionnaire revealed that, across race and ethnicity categories, the identities described by respondents were generally more consistent with their answers to combined rather than to separate questions about race and ethnicity. In this connection, it should also be noted that the Bureau's combined question format includes a new "Middle Eastern or North African" category to improve the accuracy of data collected about population groups from these origins.

The Census Bureau's tests showed that in response to combined questions, larger percentages of respondents reported identifying with multiple racial and ethnic groups. In the NCT, for example, there were "similar or higher percentages of multiple-group reporting within the combined question format for Black, Asian, American Indian/Alaska Native, and Native Hawaiian/Pacific Islander groups, compared with the separate questions approach." The Bureau believes this may be because when survey respondents see all of the race and ethnicity categories grouped together in one question, they more clearly understand that they can and should choose all of the categories that apply to them.

Outstanding Questions for the Census Bureau and OMB

While NALEO Educational Fund is confident that a single question about race and ethnicity can obtain optimally detailed and accurate responses from Latinos, we recognize that outstanding issues remain to be addressed by the Census Bureau and other government agencies responsible for federal data collection. Before the Census Bureau adopts a combined question format for the decennial questionnaire and other surveys, it must resolve these concerns.

First, the Census Bureau must determine how it will tabulate and report data based on responses to a combined question, and share its plans with stakeholders. For example, use of a combined question may increase the percentage of survey respondents who accurately report belonging to more than one major race or ethnicity category. Under some circumstances, the Census Bureau reports these data in one single "two or more races" category. However, if the combined question approach increases the diversity of responses by individuals who identify with more than one race or ethnicity, then presenting data on those individuals in a single category may not be an optimal approach.

Moreover, as the Bureau collects multiple responses indicating both membership in broad race and ethnicity categories and membership in smaller national origin, ethnic, and tribal groups, the Bureau will possess information about individuals' backgrounds that may be very complex and include many details. The Census Bureau must decide, and clearly communicate, the level of detail it can feasibly make available in various products and publications, striving to provide as much precise data as possible. To the extent possible consistent with sound statistical practices, the Bureau should also disaggregate these data by the different individual national origin and other ethnic groups.

If the Bureau adopts the proposed combined question approach, it could also continue to face issues regarding the comparability of its data with the OMB standards. The Bureau's proposed combined question continues to allow respondents to indicate "Some other race, ethnicity, or origin," as one of their choices. Thus, without a corresponding OMB category, the Bureau will continue to need to assign a racial or ethnic category to respondents who check this box. Based on the Bureau's NCT research, the number of individuals who choose this category should be significantly smaller than those who indicated being "Some other race" under the two separate question approach.

The Bureau should closely examine the characteristics of respondents who chose the “Some other race, ethnicity, or origin,” option under the combined question approach in the NCT to guide its work on this issue.

In addition, the Bureau must develop plans to ensure the comparability of data to historical statistics. With two separate questions on Hispanic origin and race, the Bureau has been able to present data on Latinos which also categorizes Latinos by race - either the specific racial category selected by Latino respondents, or the category the Bureau assigned the Latino respondent if he or she did not choose one of those specific categories.

However, with the combined question approach, there is likely to be a significant number of respondents who indicate that they self-identify solely as Latino. Thus, there would be no presentation of other specific “racial” categories for these respondents. While this approach may more closely reflect the self-identification of Latinos, it creates challenges for the comparability of data collected under the combined question approach and the separate questions approach. Thus, the Bureau may need to plan for and allocate resources to adapt old or new datasets for comparability, or consider developing tools that enable data users to convert old and new datasets into a common format.

Emerging Issues and Next Steps

The Census Bureau faces some important milestones and emerging issues as it moves forward with potential redesign of the questions on Hispanic origin and race. First, the OMB is also considering revisions to its standards relating to race and ethnicity in federal data. The OMB established a Federal Interagency Working Group to address this potential revision, and in March 2017, the Working Group published a report and proposals on its standards, which will be finalized by December 31, 2017. NALEO Educational Fund provided comments to the Working Group on its proposals, and will continue to advocate for standards that promote sound and accurate federal data collection about Latinos and other population groups. In addition, by March 31, 2018, the Bureau must submit to Congress the final wording of the questions for Census 2020, so it must finish any remaining evaluation or assessment well before that date.

The critical need for robust Census 2020 Outreach:

Finally, it is critical that the Census Bureau conduct and help coordinate robust outreach during Census 2020 to ensure that Latinos understand what is likely to be a new design for the Hispanic origin and race question. This outreach should emphasize that respondents should answer the question in the manner they feel best reflects their self-identification. It should also highlight the fact that respondents can choose to mark more than one racial or ethnic category, and can indicate more than one Latino national origin or subgroup. The re-design of the Census questions on Hispanic origin and race will only produce more accurate data if Latinos participate in Census 2020 and fill out their questionnaires in an informed manner.

For more information about the NALEO Educational Fund’s
Census policy development efforts, please contact

Ms. Rosalind Gold, rgold@naleo.org or (213) 747-7606; or
Ms. Erin Hustings, ehustings@naleo.org or (202) 546-2536.