



August 14, 2017

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<sup>†</sup> deceased

Ms. Sheleen Dumas  
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Washington, DC 20230

Submitted via email to [OIRA\\_Submission@omb.eop.gov](mailto:OIRA_Submission@omb.eop.gov)

Dear Ms. Dumas:

On behalf of the National Association of Latino Elected and Appointed Officials (NALEO) Educational Fund, I write to provide comments in response to the Census Bureau's Notice published on July 13, 2017 at 82 FR 32322, concerning 2018 End-to-End Census Test Peak Operations.

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. For the Census Bureau to compile the most accurate data possible about our population, it must ensure a full and accurate count of the Latino community. Continuous innovation is necessary to achieve this goal. While the Bureau has made progress in reducing the differential undercount of different population groups, Latinos continue to be more heavily undercounted than several other racial and ethnic groups. In 2010, the undercount of all Latinos was 1.5%, and the undercount of Latino children ages 0-4 was 7.1%.

As a crucial component of Census Bureau preparations for any decennial Census, the End-to-End Census Test conducted in each year ending in -8 must produce comprehensive data that enable the Bureau to employ new procedures and accurately anticipate how socio-economic, cultural and political influences will affect the enumeration. This process will help ensure that the agency moves closer toward its goal of counting every resident once at the correct location. In 2018, the End-to-End Test carries added weight due to the cancellation of previously-planned tests in Puerto Rico and on reservations in North Dakota, South Dakota, and Washington in 2017. The Bureau had expected to collect crucial information from those tests on how to maximize self-response using the internet in places with large numbers of harder-to-count people who speak languages other than English and who live in rural areas and non-traditional housing. In addition, significant shifts in government policy are likely to have strong effects on the willingness of Latino and other undercounted communities to provide personal information to the government.

In light of the End-to-End Test's heightened importance, NALEO Educational Fund is extremely concerned that the Bureau has dramatically narrowed its scope due to funding shortfalls. We write to emphasize the fundamental importance to ensuring the efficiency and accuracy of the 2020 decennial Census of a number of testing activities scheduled to be eliminated or reduced in scope. We urge the Bureau to

work to restore these activities by providing detailed information to Congress as soon as possible about the likely negative repercussions of delaying or cancelling components of testing. We further encourage the Bureau to reprogram funds so that it may carry out these activities as originally planned, but only if it is able to do so without reducing the sample sizes of other surveys including the American Community Survey (ACS), and impairing the accuracy and timeliness of resulting data.

Cancellation of Testing in Pierce County, Washington and Bluefield-Beckley-Oak Hill, West Virginia Eliminates the Bureau's Only Opportunity to Test New Enumeration Methods in Rural and Highly Mobile Latino Communities

Because the 2018 End-to-End Test is the Census Bureau's final opportunity to test significant changes to enumeration methods, and because the Bureau has cancelled pre-2020 Census tests it had planned to conduct in places with a diversity of demographic and geographic characteristics, it is particularly important that the upcoming End-to-End Test reach a broad cross-section of historically hard-to-count populations. In addition to undercounting Latinos generally, and especially very young Latino children, the Bureau has struggled to accurately enumerate rural populations, immigrants, people who are highly mobile or who live in non-traditional housing, and people who are not yet fully fluent in English.

Given this history, we are acutely concerned that by conducting the 2018 dress rehearsal only in Providence County, Rhode Island, the Bureau will fail to collect adequate information about how our nation's hardest-to-count Latino residents will respond to its proposed innovations for self-response, including its updated materials and outreach. Pierce County, Washington and Bluefield-Beckley-Oak Hill, West Virginia are very different demographically and geographically from Providence County, and offer unique opportunities to assess populations and conditions that challenge the enumeration process; for example, Pierce County is home to notable agricultural activity and has a more mobile population than the nation as a whole, which includes migratory farmworkers. According to the Census Bureau's QuickFacts data tables, poverty rates in the area of West Virginia that was to be tested are as much as 73% higher than the national average, and residents of the region younger than 65 are more than twice as likely as all Americans to be living with a disability. Shortchanging thorough research and preparation could cause the Bureau to overestimate self-response to the 2020 Census, and thereby lead to cost overruns or a higher undercount of rural, migrant, and limited-English proficient Latinos.

*Internet Response*

To prepare to conduct a decennial Census in which a majority of data are expected to be collected through the internet, it is essential that the Census Bureau thoroughly evaluate residents' willingness and ability to use the internet to provide personal information in a variety of communities that vary as to their demographic, geographic, and economic characteristics. Internet response rates are likely to vary widely based on factors including personal comfort with the privacy and security of electronic communications, and degree of access to broadband networks. For example, a survey conducted for the Leadership Conference on Civil and Human Rights by Anzalane Liszt Grove Research in December 2016 found that just 29% of Spanish-dominant Latinos said they would likely use the internet to respond to the 2020 Census, compared to 53% of all respondents. Moreover, according to Federal Communications Commission data, while strong majorities of residents of Providence County, Rhode Island have internet connectivity allowing for uploads and downloads at a speed of at least 200 KB per second, between 60% and 80% of households in numerous Census tracts in Raleigh County, West Virginia, where planned testing has been eliminated, do not have effective internet access.

Such evidence indicates that it is very likely that encouraging Latino households to provide Census responses through the internet will succeed to varying degrees in communities across the country that are as different from one another as are the original End-to-End Test sites in Rhode Island, Washington, and West Virginia. We are acutely concerned that cancelling testing in Washington and West Virginia will leave the Census Bureau inadequately prepared to maximize Latinos' rates of internet self-response to the 2020 Census in

places with concentrations of rural and non-traditional housing, highly-mobile residents, and people with immigrant backgrounds who are not yet fully fluent in English.

#### *Non-Response Follow Up*

NALEO Educational Fund is also concerned that the failure to comprehensively test significantly altered methods for following up with households that do not initially participate in Census self-response will have a negative impact on data accuracy. As compared to past decennial Censuses, non-response follow up (NRFU) operations in 2020 will make increased use of electronic data collection, and include fewer contact attempts by Census enumerators. Enumerators' use of electronic devices instead of paper forms may exacerbate anxieties about the federal government's protection and use of personal data, particularly among older Americans, who are more likely than their younger counterparts to say they are concerned about the security of electronic communications according to the December 2016 survey conducted by Anzalone Liszt Grove Research. In addition, immigrants and members of mixed immigration status households may be more reluctant to provide information to Census employees using electronic devices that, unlike paper forms, are vulnerable to hacking.

In addition, unless sound research guides efforts to target NRFU contacts to the hardest-to-reach households, reduced capacity to make personal contact with non-responding households will very likely increase the undercount of Latinos who live in rural areas and non-traditional housing, and who are mobile or have limited or no English proficiency. To understand how NRFU results will change across diverse communities, and how NRFU deployment should change to maximize its utility, the Census Bureau must test updated NRFU methods not only in Providence County, but also with Latinos who are older, more rural, and more migratory, and living in regions of Washington and West Virginia previously chosen for the End-to-End Test.

#### *Accuracy and Completeness of Administrative Records*

NALEO Educational Fund has consistently expressed concerns about the quality, consistency, and accuracy of information contained in administrative records as a potential substitute for direct enumeration, and we remain acutely concerned that such records lack accurate and up-to-date information about race, ethnicity, and household relationships, and especially about hard-to-count households that include immigrants and young children. The use of administrative records for enumeration as a replacement for firsthand information about a variety of households has significant implications for the accuracy of Census data. It is not sufficient for the Bureau to investigate the usefulness of these records in supplying information about only the relatively urban and stable Latino population of Providence County. Scientific rigor demands that the agency test the quality and completeness of those records concerning the hardest-to-count Latino residents and households. This involves validating the use of administrative records in both rural and urban areas, including those with large concentrations of renters, immigrants, people not yet fully fluent in English, farmworkers and other highly-mobile residents.

#### *Update/Leave and Update/Enumerate Operations*

Historically, the Census Bureau's counts of places enumerated through Update/Leave and Update/Enumerate procedures have had relatively high rates of error as indicated by Coverage Measurement results. This fact, and the Bureau's July 2017 announcement that it would shift millions of addresses from the Update/Enumerate to the Update/Leave workload, counsel strongly in favor of extensive testing and evaluation of the effectiveness of these procedures. Given that Update/Leave is a more passive approach to enumeration, testing and evaluation is critical to mitigate any potential declines in self-response that may result from expanded use of this approach.

NALEO Educational Fund is therefore extremely concerned about the Census Bureau's proposal to test only Update/Leave operations during the 2018 End-to-End Test, and only in Providence County, a site which may not produce the most useful information about the efficacy of Update/Leave procedures. It is likely that



many more Latino households exist within now-cancelled test sites in Washington and West Virginia than in Providence County that meet the criteria for inclusion in the Update/Leave workload, including lack of city-style mailing addresses and home mail delivery, and use and accessibility of the residence that vary seasonally. The testing of Update/Leave in Providence County alone will not provide sufficient information to enable the Bureau to fine-tune this operation to maximize the accuracy of the data collected from Latino respondents.

*Imputing Race and Producing Historically Comparable Statistics When Using a Single Combined Race and Ethnicity Question*

While we are pleased that the Census Bureau plans to continue testing of a single question about Hispanic origin and race during the 2018 End-to-End Test, we are concerned that the information it would collect from surveys disseminated in only one county would not provide sufficiently comprehensive data to support sound decision-making. NALEO Educational Fund has consistently urged the Bureau to test all aspects of potential changes to data collection on race and ethnicity across the broadest possible cross-section of U.S. residents, including people with varying linguistic abilities, immigration and citizenship status, and socio-economic and educational attainment.

Latinos from different communities and backgrounds have widely divergent experiences and opinions, which must be taken into consideration as comprehensively as possible. This comprehensive effort is particularly critical for the testing needed to inform the Bureau's procedures for producing datasets derived from the proposed combined question which have sound comparability to the data derived from the Bureau's two separate question approach. We recognize the critical importance of ensuring the Bureau's ability to accurately impute race to respondents who do not choose an OMB-recognized category, and to produce comparable datasets when it uses a combined question on race and ethnicity; therefore, the testing and analysis that underscore this work must incorporate responses from diverse communities of Latinos such as those residing in the three locations in which the Bureau initially planned to conduct the 2018 End-to-End Test.

Eliminating All Testing in 2018 of Critical Aspects of Decennial Census Enumeration Puts the Accuracy and Usefulness of the 2020 Census in Jeopardy

Current events and the mood of the nation are very likely to have strong effects on the ease or difficulty of conducting the 2020 Census. In 2020, the Census Bureau will face acute challenges stemming from factors including the public's perception that the federal government cannot guarantee the security and privacy of its databases, and of the federal government's efforts to accelerate enforcement of criminal and immigration laws. It has never been more indispensable to the success of the decennial Census that the Bureau perfect its messaging and outreach to forestall security-related concerns. The Bureau must also be able to anticipate where there might be high rates of non-response, to concentrate limited resources on reaching the hardest-to-count households. It is therefore extremely troubling that the Census Bureau does not anticipate testing in 2018 those aspects of its operations that will best prepare it to counter the strong headwinds facing it as it approaches 2020.

*Communications Campaign and Partnership Program*

As noted in NALEO Educational Fund's previous comments on the 2018 End-to-End Census Test dated May 30, 2017, robust and effective communications and partnership efforts are crucial to educate Latinos about how to participate in the decennial Census, and to ensure Latinos' familiarity with the different options available for participation. Communications and partnership efforts are also essential to ameliorating the severe undercount of very young Latino children, as they hold the greatest promise of providing the information families need to complete Census materials accurately.

Most importantly, it is only with strong messaging and solid community partnerships that the Bureau can hope to overcome high levels of mistrust of the government and maintain strong rates of self-response to the decennial Census. Cybersecurity and the weakness of existing protections continue to be frequent topics of conversation and media coverage; for example, two weeks prior to the filing of these comments, there was widespread discussion of the fact that attendees at the annual DEF CON programming conference had succeeded at hacking into voting machinery in less than 90 minutes, and had thereby accessed the actual voter registration records of more than 600,000 individuals.

In addition, President Trump's Administration and Congress continue to advocate for or conduct more robust immigration and other enforcement activity. Government agencies in many communities are reporting measurable and noticeable declines in the willingness of residents to engage with those agencies. These similar trends will diminish the quality and reliability of the decennial Census unless the Bureau does as much as it can to win residents' trust by communicating effectively and enlisting convincing messengers who do not work for the government. If it is to accomplish this, the Census Bureau simply cannot afford to eliminate communications and partnership testing from its 2018 End-to-End Test.

#### *Coverage Measurement*

NALEO Educational Fund reiterates the concerns raised in our May 30, 2017 comments about the negative consequences of failure to test Coverage Measurement in the 2018 End-to-End Test. As we previously noted, the Coverage Measurement Operation would provide invaluable information about the effectiveness of the Bureau's operational and technological enhancements, enabling the agency to identify successes and anticipate challenges among particular demographic groups and in targeted geographic areas. The information the Coverage Measurement Operation would provide about the accuracy and comprehensiveness of the 2018 End-to-End Test is essential to ensure the Bureau can make effective alterations to its plans and materials needed to forestall potential undercounts in Census 2020. The failure to test Coverage Measurement will significantly impair the Bureau's ability to make these alterations, causing the 2018 End-to-End Test to fail to fulfill its fundamental purpose. Like "test-driving" communications and partnership campaigns, measuring the accuracy and the effective reach of the test Census is an indispensable activity; the quality of the 2020 Census depends upon it.

#### Conclusion

NALEO Educational Fund urges the Census Bureau to restore as much of its full original plan for the 2018 End-to-End Census Test as is possible, to include dissemination of surveys in Pierce County, Washington and Bluefield-Beckley-Oak Hill, West Virginia and full testing of the Communications Campaign, Partnerships Program, and Coverage Measurement Operation. We recognize that fiscal constraints limit the Bureau's capacity, and we would oppose expansion of the scope of the 2018 End-to-End Test if it were to come at the expense of the quality of other important data products, including the ACS.

We strongly encourage the Census Bureau to provide, as soon as it is able, detailed information to Congress about the consequences of cancelling aspects of the 2018 End-to-End Test in terms of reduced decennial Census data quality, and heightened expense that would result from depressed self-response rates. In addition, we ask the Bureau to take stock of the data and qualitative feedback it will fail to collect by cancelling sites and tests of particular operations. The Bureau must actively seek out any alternate relevant information for Census 2020 planning activities that would have otherwise been informed by a fully-functioning 2018 End-to-End Test.

Educational Fund

Ms. Dumas  
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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](mailto:rgold@naleo.org). Thank you for your consideration of our views.

Sincerely,

A handwritten signature in black ink, appearing to read 'Arturo Vargas', with a stylized flourish at the end.

Arturo Vargas  
Executive Director

cc: Congressional Hispanic Caucus  
Congressional Hispanic Conference

