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August 29, 2016

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Washington, DC 20230

**Re: Request for comments regarding the Local Update of Census Addresses Operation**

Dear Ms. Jessup:

On behalf of the National Association of Latino Elected and Appointed Officials (NALEO) Educational Fund, I write to comment on the Census Bureau’s Notice of Proposed Information Collection published in the Federal Register on June 30, 2016, FR Doc. 2016-15495, concerning the Local Update of Census Addresses (LUCA) Operation.

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 more than 6,100 Latino elected and appointed officials serving throughout the country, and include Republicans, Democrats, and Independents.

The NALEO Educational Fund is a national leader in Census outreach, community education and policy development. Since the 1990 Census, the organization has conducted outreach campaigns to promote the full and accurate count of the Latino community, and we conducted the largest private national Census campaign in 2010. Together with Spanish-language media and national organization partners, we helped coordinate the multi-media *ya es hora: ¡HAGASE CONTAR!* (“It’s time: Make Yourself Count!”) effort, which included partnerships with a broad network of local organizations; the dissemination of community education materials; a toll-free Census information hotline staffed by bilingual operators; technical assistance for community groups; and direct assistance to Latino residents with completing Census forms.

Since the mid-1990’s, the NALEO Educational Fund has also worked closely with its Latino elected official constituency, other government officials and partner organizations to promote public policies to achieve the most accurate count possible of the nation’s population. We have served on the Decennial Census Advisory Committee, the Census Advisory Committee, and the National Advisory Committee on Racial, Ethnic, and Other Populations. The NALEO Educational Fund is also the co-chair of the Leadership Conference on Civil Rights’ Census Task Force, and of the National Hispanic Leadership Agenda’s Census Task Force.



To conduct a full and fair count of the Latino population, the Census Bureau must start with an accurate Address List, and LUCA has a proven track record of usefulness and importance in achieving this goal. During the 2000 and 2010 decennial census cycles, the Census Bureau collected millions of updates concerning successfully enumerated addresses from LUCA participants. In this comment letter, we first provide some general information about Latino residential arrangements and demographic characteristics which the Bureau should take into account as it moves forward with its LUCA planning and implementation. We then submit recommendations to maximize the utility and accuracy of information gathered through the program, and to minimize the burden of participation to prospective partner jurisdictions.

### Latino Residential Arrangements and Demographic Characteristics Particularly Relevant to LUCA

There are several demographic characteristics of the Latino community that are particularly relevant to LUCA and the proposed new technological and operational approaches the Bureau is planning for the 2020 Census. We will provide general information about these characteristics in this section, and we will also highlight their relevance to specific LUCA components in our recommendations below.

First, Latinos are more likely to live in “hard-to-count” areas than the overall population, which include areas with non-traditional housing and with many multi-unit buildings. These areas include the border region *colonias*, which lack public utility or transportation infrastructure. They include urban or suburban areas where several households live in one residential unit, or where family members reside in parts of homes not traditionally used for housing, such as garages. These types of residential situations create challenges for the compilation of accurate and useful Master Address File (MAF) information. In addition, according to 2014 American Community Survey 1-year estimates data (hereinafter “2014 ACS data”), Latinos are more likely to rent their residences than the overall population (55% compared to 37%), and the Bureau considers renters to be one of the major hard-to-count groups.

It should also be noted that an April 2016 report released by the NALEO Educational Fund and Child Trends Hispanic Institute revealed that approximately 400,000 very young Latino children (age 0-4) were left uncouned in the 2010 Census, and that the net undercount rate of these Latino children was 7.1%, higher than the comparable rate for non-Latinos (4.3%).<sup>1</sup> While we do not know definitively what specific factors contribute to the high net undercount among very young Latinos, we believe that residential and housing characteristics of these children’s households may play a role, and that this issue bears further research. Thus, as the Bureau proceeds with its LUCA planning, we urge the agency to recognize the importance of reducing the undercount of young Latino children in Census 2020 and to consider the impact of its LUCA approaches on achieving this goal.

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<sup>1</sup> William P. O’Hare, Ph.D., Yeris Mayol-Garcia, Ph.D. Candidate, Elizabeth Wildsmith, Ph.D., and Alicia Torres, Ph.D., *The Invisible Ones: How Latino Children Are Left Out of Our Nation’s Census Count*, Child Trends Hispanic Institute and National Association of Latino Elected and Appointed Officials (NALEO) Educational Fund, April 2016, online at <http://www.childtrends.org/wp-content/uploads/2016/04/2016-16TheInvisibleOnesLatinoCensus.pdf>.

Recommendations for Improving Quality and Utility of Address Information Collected

*Continue sending block counts and accepting block count challenges in order to improve information about residences without city-style addresses and that do not receive mail delivery.*

We understand that the Bureau is considering limiting the information it sends to governments participating in LUCA, and including only those residences that are assigned a city-style address that includes a structure number and street name. The NALEO Educational Fund believes the Bureau should use the LUCA program to gather information about the hardest-to-count areas and populations, which prominently include many neighborhoods with non-traditional housing that lack city-style addresses and that are occupied by Latinos. We urge the Bureau to provide participating jurisdictions with block counts of residences without city-style addresses as it has done in past cycles, and to collect feedback from jurisdictions that find discrepancies with the Bureau's records.

The LUCA program can be an effective and prolific source of information about the residences most likely to be at risk of not being enumerated, and it can thereby reduce the differential undercount of Latinos and other communities of color. Governments participating in LUCA possess significant and unique knowledge of the location and use of residences that are not known to the Census Bureau. For example, local or tribal governments may become aware of places lacking city-style addresses through administration of property tax systems or building and safety permitting procedures, or they may be involved in providing social services to populations living in marginal or isolated areas where house numbers and street names have not been assigned.

The results of LUCA programs in past decennial census styles clearly demonstrate the fact that LUCA participants have information the Census Bureau lacks. For example, over the course of the LUCA operation immediately preceding the 2010 Census, participating entities submitted more than 100,000 valid challenges to the Bureau's counts of addresses within blocks lacking city-style designations. To ensure capture of similar critical and helpful information, we urge you to maintain the block count component the LUCA operation in preparation for the 2020 Census.

*Take steps to protect against erroneous deletion of non-standard residential locations reported by LUCA participants.*

As it has always done, the Census Bureau should continue to take steps to verify address additions, deletions, and other changes submitted by LUCA participant governments prior to undertaking enumeration of those addresses. However, we are concerned that conducting a larger share of verification activities in-office could result in a failure to verify valid changes concerning Latino residences that would have otherwise been confirmed by in-field canvassing.

Where confirmation is undertaken in-office only, there is particular danger of missing residences whose occupants live in non-traditional housing or who are less likely to appear in official records. These residents include undocumented immigrants (approximately 70% of whom are Latino, according to the Migration Policy Institute), persons with disabilities, retired occupants, or others who derive their financial support from family or friends.

For example, a participating government might report the use of a detached garage or guest quarters at a particular property as a separate residence. However, the satellite imagery sources used for in-office verification might not reveal that separate structures on the same piece of property were in use as separate residences. Moreover, tax and other administrative records used for in-office verification might not reflect tenants' presence.

By contrast, successful in-field canvassing could confirm the use of the structure in question as a separate residence through visual observation or discussion with tenants or nearby residents. If, in such a situation, in-office procedures did not produce any secondary evidence of use as a residence, sole reliance on in-office address canvassing would result in erroneous rejection of the reported addition of an address. It is not even clear to us that the Bureau would try to confirm existence of a second residence at a single address before matching the LUCA report to an existing MAF record and rejecting the report as a duplicate address.

We recommend the Bureau take steps to mitigate the possibility of rejecting valid submissions, which would be heightened by the proposed reduction of in-field address canvassing operations. We understand that the Bureau will eliminate the option participating governments previously enjoyed of submitting their full address files without first comparing them to Census records. Thus, the Bureau should receive relatively fewer LUCA submissions that overlap with existing MAF records for the 2020 decennial cycle. Presuming that this approach will provide the Bureau with more capacity to review apparent duplicate reports closely, we recommend that the Bureau adopt a protocol of searching for confirmatory evidence of multiple residences at a single address before concluding that a duplicate address has been reported in error.

We also recommend that in its reports to participating jurisdictions that describe the actions taken on address changes reported by tribal, local, and state governments, the Bureau provide some indication of the basis on which particular changes have been rejected, whether due to findings of in-office or in-field address canvassing. This would allow jurisdictions to focus in the appeals process on instances in which the limitations inherent in in-office address canvassing are likely to have prevented the Bureau from confirming valid address changes.

*Continue to accept alternative identifiers for housing units within multi-unit addresses where unit numbers are not available or known.*

We are also concerned that the Bureau may lose accurate and useful information about Latinos and other historically undercounted populations if it decides to accept and integrate only those records that assign a unit number to each separate housing unit at a multi-unit address. According to the National Multifamily Housing Council, more than half of all renters in the country live in structures that contain two or more housing units, and as noted above, Latinos are more likely to be renters than the overall population. Thus, the policy adopted toward compilation of multi-unit addresses by the Bureau would have a significant impact on the accuracy of the 2020 count of Latino residents.

As the Bureau is aware, there is a wide variety of possible designations assigned to units within multi-unit structures, including not just numbers but letters, directions (e.g., “East”, or “Basement”), or even no indicator at all. Conducting a complete count requires enumerating everyone at a multi-unit structure whether or not the unit each person occupies has been assigned an indicator that is convenient for the Bureau to use. The Bureau must make any necessary adaptations to its records and operational systems that will enable it to accept and enumerate units reported by LUCA participants as existing within multi-unit structures, regardless of the kind of identifier for the unit reported by the participating jurisdiction. The Bureau might consider making multi-unit structures a top priority for in-field address canvassing to ensure that MAF and other records essential to the enumeration process include the maximum possible number of places in actual use as residences, and accurately reflect the location and identifiers assigned to each residence.

*Seek exemptions from applicable Appropriations Act and Executive Order-based restrictions that may limit or prevent the hiring of culturally-competent noncitizens as in-field address canvassers.*

We believe that LUCA participants have the capacity to significantly improve the Bureau’s inclusion of hard-to-reach populations in enumeration efforts, but this will only occur if address canvassing operations effectively confirm that LUCA addresses are valid and in use as residences. As noted above, many Latinos live in non-traditional housing or residential situations, and in-office satellite review of communities may fail to identify this housing. The Bureau’s proposed use of administrative records may not effectively enhance address canvassing for Latino residents who do not regularly interact with government agencies. Therefore, it is particularly important that in-field address canvassing operations are structured around building capacity to identify traditionally undercounted areas and people, including those that may be represented in address additions and changes reported by LUCA-participant jurisdictions.

One of the soundest ways to maximize the utility and accuracy of in-field address canvassing, and to increase the likelihood that the Bureau will enumerate Latinos and other historically undercounted populations, is to hire culturally competent canvassers who are able to effectively communicate with and earn the trust of hard-to-count residents. The Bureau is most likely to achieve this goal if it is legally able to undertake broad recruitment of people eligible to work in the United States regardless of their citizenship status. For example, according to 2014 ACS data, just 6.0% of U.S. citizens 18 or older speak both English and Spanish ably, compared to 12.1% of noncitizen adults. Just 4.1% of U.S. citizen adults speak English and a second language other than Spanish fluently, while 14.8% of noncitizen adults possess those valuable skills.

To conduct sound LUCA in-field address canvassing operations, we believe the Bureau must deploy a sufficient number of in-field canvassers who possess the linguistic skills and cultural competence to effectively work in communities whose residents are not yet fully fluent in English or may not trust the government. Therefore, we urge the Bureau to seek any necessary exemptions to appropriations legislation and Executive Order 11935 that will allow recruitment and hiring of noncitizens who are legally permitted to work in the United States, and have needed linguistic ability, community connections, and cultural sensitivity.

#### Recommendations for Minimizing the Burden to Tribal, Local, and State Governments of Participating in LUCA

##### *Diversify notification and invitation methods.*

As strong supporters of the LUCA program and partnerships between the Bureau and other government entities, we are dismayed that only approximately one-quarter of eligible governments were active participants during the 2010 decennial census cycle. We recommend that the Bureau broaden its outreach to eligible governments in order to increase the percentage that ultimately participate. Outreach efforts to potential LUCA participant governments will be particularly critical to the success of LUCA operations conducted in preparation for the 2020 Census because the Bureau has closed half of the regional offices it operated in connection with the 2010 Census. The closure of these offices has reduced the amount of regular contact between Census and state, local, and tribal government personnel, as well as the visibility of Census operations in many communities around the country.

During the 2010 decennial census cycle, the Bureau issued invitations to participate in LUCA through mailings addressed to top officials serving in eligible government entities. Through extensive collaboration with elected and appointed officials serving at various levels of government, we have learned that passive mailings directed to busy leaders are a relatively inefficient method of communication, particularly with entities with whom one has no pre-existing relationship.

We urge the Bureau to direct more of its resources during the remainder of the 2016 calendar year and during the LUCA Invitation phase to working through existing partnerships and trusted intermediaries to develop relationships with a cross-section of personnel in eligible governments.

For example, the Bureau should make maximum effort to secure opportunities to make presentations about the benefits of participating in LUCA at conferences and other meetings of associations of government officials, and to enlist organizations such as NALEO, the National Conference of State Legislatures and National Hispanic Caucus of State Legislators, the National Association of Counties and National Association of Hispanic County Officials, the United States Conference of Mayors and the Latino Alliance of Mayors, the National League of Cities and Hispanic Elected Local Officials, and others in alerting their members that LUCA will soon begin. Since it will rarely be the highest-ranking official within a governmental body who determines whether LUCA participation is feasible and who administers the entity's participation, it may be productive for the Bureau to seek recommendations from associations of government professionals, such as the International City/County Management Association, as to the appropriate individual or office to contact about program participation in a given government.

Larger, better-resourced governments can also play these roles with respect to the smaller entities within their jurisdiction: for example, states can be highly effective messengers when they endorse the LUCA effort and encourage counties, tribal areas, and municipalities within the state to participate. States and counties may also be able and willing to provide valuable input as to the local person or office to whom invitations and subsequent materials are best addressed.

We recognize that the scope of the LUCA operation is vast, and that the resources available to the Bureau to promote and publicize the program will be limited. Therefore, we recommend that the Bureau prioritize outreach to those parts of the country that had the lowest rates of participation by eligible governments in past decennial census cycles, where awareness of LUCA and understanding of the benefits of participation are likely to be at the lowest levels. Jurisdictions whose past low rates of participation are of particular concern to the NALEO Educational Fund include states like New Mexico, Texas and Illinois, which are home to large and diverse Latino populations as well as hard-to-count communities; and Midwestern and southeastern states whose Latino populations have been growing particularly rapidly.

*Encourage cooperation between governmental entities eligible to participate.*

We applaud the Bureau's past efforts to encourage overlapping government entities to cooperate with one another to review and comment upon address records on file, and we urge the Bureau to continue actively promoting and fostering such collaboration. We believe this type of collaboration will lessen the burden of participation and potentially increase the number of eligible entities that take part in the LUCA program. We recommend that outreach and invitations explicitly ask larger governments to contact smaller governments within their jurisdiction about LUCA and proactively offer any available technical assistance. The Bureau can also foster cross-government cooperation by training large-government personnel in the efficient management and compilation of records provided by smaller governments, and by notifying larger entities of the smaller entities within their territory that are participating or have expressed interest in doing so.

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Finally, we encourage the Bureau to consider allocating a longer period in its proposed timeline for the "Address Review" stage, which would give cooperating levels of government additional time to consolidate their responses, and reduce the number of response packages the Bureau would need to review and take action upon. For example, the Bureau could consider the feasibility of providing additional review time by shortening the four-month period between the "Advance Notice" and "Invitation" stages of its plan, enabling it to finish sending invitations and to begin address review sooner than currently envisioned.

### Conclusion

As an organization committed to ensuring that Latinos become full participants in our nation's democracy, the NALEO Educational Fund shares the Census Bureau's dedication to conducting the most, inclusive, fair and accurate decennial census possible. We strongly support the maintenance of a robust and thoughtfully-planned LUCA program, which will help ensure that we reach this important goal. We believe that as the Bureau moves forward with new technological and operational approaches to Address Canvassing, it must take into account the impact of these approaches on the compilation of accurate information about the residential situations of Latinos and other hard-to-count communities. In addition, the enlistment of an ever-widening circle of stakeholders in sharing information about where Americans live will more efficiently expand the Census Bureau's limited capacity, and improve the quality of essential data about our population. Together with our constituency of the nation's Latino elected and appointed officials, we look forward to working together with you to ensure LUCA's successful operation between now and 2020, and to implement enhancements, including those we have recommended herein.

Should you have any questions, please contact Laura Maristany, the NALEO Educational Fund's Washington, DC office director at 202-360-4182 or at [lmарistany@naleo.org](mailto:lmарistany@naleo.org). Thank you for your consideration of our views.

Sincerely,



Arturo Vargas  
Executive Director

cc: Congressional Hispanic Conference  
Congressional Hispanic Caucus