



December 17, 2018

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

Submitted via <http://www.regulations.gov> (Docket # USBC-2018-0013)

RE: Comments on Generic Clearance for Census Bureau Field Tests and Evaluations

Dear Ms. Jessup,

On behalf of the Arab American Institute (AAI), we are pleased to provide comments in response to the Federal Register notice (the "Notice"). The Notice asks for comments on two issue areas important to Arab Americans and other communities across the country: ways to enhance the quality, utility, and clarity of the information to be collected, as well as ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other forms of information technology.

As an organization, AAI seeks to nurture and encourage the direct participation of Arab Americans in political and civic life in the United States. AAI represents the policy and community interests of Arab Americans and strives to promote Arab American participation in the U.S. electoral system. Serving as a central resource to policy makers, the media, political leaders, and community groups on a variety of public policy issues that concern Arab Americans, AAI has been engaged in efforts to ensure support of an accurate census count since its founding in 1985. AAI currently hosts the only Census Information Center tasked with dissemination of data about Arab Americans. We have been actively working with the Census Bureau (the Bureau), coalition groups, and a working group we co-founded and lead, in preparation for the 2020 Census. Federal statistics estimate there are 1.96 million Arab Americans living in the United States, a gross underestimate of the community. Research done by AAI suggests a more accurate estimate is around 3.66 million Arab Americans.¹ It is of mutual interest for AAI and the Bureau to find the best way to ensure a fair and accurate count for Arab Americans and other MENA populations for the upcoming Census.

¹ Arab American Institute. "National Demographic Profile 2014." National Demographic Profile 2014. 2014. https://d3n8a8pro7vnm.cloudfront.net/aai/pages/9843/attachments/original/1460668240/National_Demographic_Profile_2014.pdf?1460668240.

AAI knows field tests and evaluations are essential for the Bureau to understand the best ways to reach hard to count communities. It was actually in the field test and evaluations that the combined question format and the MENA category were proven to be effective at increasing response rates for Arab Americans and other communities, leading to a more fair and accurate count. It was research done by the Bureau which found that “the strategy to combine the race and Hispanic origin questions into one item resulted in dramatically lower item nonresponse compared to the separate race and Hispanic origin questions.”² However, it is also important to note results and information gained from field tests should be used to reach a fair and accurate count, and the Bureau itself should be accountable to ensure the research leads to positive policy changes. While we hoped that would be true for the MENA category, that was not the case. In fact, the Bureau has yet to give a credible explanation as to why a method that was Bureau tested and proven effective would still not be used in the upcoming Census if the goal, is indeed to, count all Americans.

The Notice mentions that the Bureau will be using non-English language training and interviews in the research phase, and AAI believes this is a vital part of effectively reaching out to a variety of Americans. We urge the Bureau to conduct research in Arabic, and to do so in a way that demonstrates cultural competency. AAI also urges the Bureau to develop forms in Arabic as well as English so that Arab Americans who are non-native English speakers can still fill out their form accurately.

Other ways to enhance the quality of the data is to rely on the preferences of the people themselves. While we are aware the Bureau would like to use online forms and phase out mailer forms as a cost-saving strategy, research done by AAI and other groups working with hard to count communities has seen members of their own communities in large numbers state their preference for mailer forms. In order to ensure all Americans are counted, the Bureau must adjust its strategy on outreach to account for these preferences.

The Notice mentions the reliance on technology in obtaining responses and reaching out to individuals to fill out the online form. A major concern with the use of technology is the assumption that people have safe and reliable internet connections to complete the Census form. Beyond this concern, many groups working with hard to count communities noted the use of technology was of concern for the respondents because they did not feel their data was going to be kept confidential. This lack of trust in government makes respondents less likely to fill out the Census form more generally, and specifically more skeptical to supply their information online.

From an institutional standpoint though, AAI is also concerned about the cybersecurity risks associated with an online form. Hacking has become a more common phenomenon, seen in government agencies as well as corporations and our electoral system in the last presidential election. This cybersecurity threat is something we do not take lightly. These cybersecurity issues are to concern of organizations like AAI, as well as the millions of community members we represent.

AAI is also concerned about the automation used during the 2020 Census, which the Notice mentions. While it may work in theory, the Bureau should have back up plans in the event that

² United States. Department of Commerce. Census Bureau. *2010 CENSUS PLANNING MEMORANDA SERIES*. By Burton Reist. 2nd ed. Vol. 211. Washington, DC: Census Bureau, 2013. 1-151.
https://www.census.gov/2010census/pdf/2010_Census_Race_HO_AQE.pdf

technologies malfunction during their use in field operations. Field staff and enumerators must be trained and given materials to work without their ability to access these technologies in the event that they are not useable.

To ensure successful field tests, AAI recommends using Arabic language interviews and testing the effectiveness of Arabic language forms, noting that there will not be Census assistance centers as have existed in the past. AAI would also urge the Bureau to put the MENA category in their field tests to see if this research is consistent with past field testing done to ensure a fair and accurate count is reached. AAI also believes the Bureau should meet Americans where they are, using studies that gauge their preferences, similar to testing done by AAI that showed a majority of Arab Americans prefer to fill out the Census through a paper form instead of using an online form. Additionally, technology cannot and should not be relied on so heavily. Beyond cyber-security concerns, issues with automation and lack of trust in government makes AAI, other stakeholders, and community members skeptical on the reliance on the use of technology which will very likely negatively impact an accurate count of already hard to count communities during the 2020 Census.

As a community-based organization with a long-held vested interest in accurate census data, we are hopeful these recommendations for the field tests and evaluations can be taken into account to ensure tests are useful in identifying ways we can best count all Americans. Actions that compromise the accurate, constitutionally mandated collection of data will harm communities across the country, including Arab Americans. It is imperative that federal officials act at this time to (1) use Arabic language in interviews and online forms, (2) add a MENA category, and (3) alter and assess the best ways to use technology to encourage accurate data. These recommendations will uphold the commitment of the Census Bureau to conduct field tests that help gather accurate data on all individuals residing in the United States in 2020.

Thank you for the opportunity to comment on the upcoming Census and for taking these concerns seriously. If you have any further questions about the comments provided here, please feel free to contact Suher Adi at 202-429-9210 or sadi@aaiusa.org.

Sincerely,

A handwritten signature in black ink, appearing to read 'Maya Berry', with a stylized, flowing script.

Maya Berry
Executive Director