VIA EMAIL

October 23, 2018

Jennifer Kim
Assistant Division Chief
Decennial Census Management Division
U.S. Census Bureau
4600 Silver Hill Road
Washington, DC 20233
jennifer.kim@census.gov

Dear Ms. Kim –

On behalf of community-based organizations representing Asian Americans and Native Hawaiians and Pacific Islanders (NHPI) throughout the country, we write to express concerns regarding the language support program for the 2020 Census and to provide related recommendations we believe will promote a more accurate count of those we serve.

According to the Census Bureau's 2017 Population Estimates, there are over 22 million Asian Americans and nearly 1.6 million NHPI living in the United States. Our communities are the fastest growing in the country: the nation's Asian American and NHPI populations grew 25.5% and 17.3% respectively between 2010 and 2017,[1] with most of that growth attributable to immigration. The success of the 2020 Census depends on the full participation and cooperation of all segments of the American people, including immigrant communities and those who are limited-English proficient (LEP).

Among racial groups, Asian Americans have among the highest levels of limited-English proficiency; over a third of Asian Americans and 13.5% of NHPI are LEP.[2] Rates of limited-English proficiency are particularly high among some Asian American and NHPI ethnic groups: Burmese (72.5%), Vietnamese (51.8%), Nepalese (51.7%), Chinese (45.9%), Bangladeshi (44.4%), Thai (43.2%), Korean (42.9%), Cambodian (41.1%), Indonesian (35.5%), Laotian (38.7%), Hmong (37.3%), Micronesian (22.8%), and other groups must grapple with disproportionately high language barriers.[3] Failure by the Census Bureau to provide adequate language assistance to Asian American and NHPI respondents will decrease response rates and increase the amount of missing and inaccurate responses to the 2020 Census, resulting in a misleading portrait of our growing communities that has serious consequences for federal, state, and local funding, access to services, and civil rights protections.

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[1] U.S. Census Bureau, 2017 Population Estimates.
[2] Horikoshi & Minnis, RISE for Boys and Men of Color, Asian American and Pacific Islander Boys and Men: The Risk of Being Missed in the U.S. 2020 Census 5, http://www.risebmoc.org/issues/post6.
[3] *Id.*

Certainly the 2020 Census Language Support Program has incorporated improvements relative to 2010. With the lower threshold to trigger language support (60,000+ compared to 100,000+), there is more language coverage for some facets of the 2020 Census, specifically the online questionnaire and telephonic support. As you know, the Census Bureau's current plan supports an online questionnaire and Census Questionnaire Assistance (that is, telephonic support) in 12 non-English languages (Spanish, Chinese (Simplified), Vietnamese, Korean, Russian, Arabic, Tagalog, Polish, French, Haitian Creole, Portuguese, and Japanese).[4] Census Bureau telephonic support will also now allow respondents to fill out their census form over the phone. The plan further provides for language glossaries, language identification cards, and language assistance guides (video and paper) in 59 languages.[5]

While we appreciate these improvements and the transparency by which the language determinations were made and shared, we are gravely concerned with the considerable gaps that remain in the current 2020 Census Language Support Program. Below, we articulate several recommendations that we think are critical to a complete count of our communities.

1. For Asian American and other language minority communities, perhaps the most serious shortcoming of the 2020 Census Language Support Program is the provision of the paper questionnaire in only English and Spanish. We are particularly concerned because early focus group testing completed by Asian Americans Advancing Justice – AAJC has indicated that many Asian American community members have a preference for completing the 2020 Census in a paper format. The decision to not provide the paper questionnaire in languages other than English and Spanish is disproportionately burdensome for the low-income language minority communities that have lower levels of internet connectivity and limited access to the online form available in 12 languages. **We recommend that the Census Bureau invest the resources needed to make the paper version of the 2020 Census questionnaire available in the same languages in which it is available online.**

2. We are also concerned about the loss of assistance in several key languages. While some languages were added to the Census Bureau's current plan, there are no NHPI languages, no Alaskan Native languages, and only one American Indian language (Navajo) covered. During the 2010 Census, nine languages were added based on requests made by specific Race and Ethnicity Advisory Committees. We recommend a similar kind of discretionary coverage to expand access for these key communities. **We recommend, at a minimum, adding the languages supported in 2010 that are currently NOT on the 2020 Census language list: Cebuano, Chamorro, Chuukese, Marshallese, Samoan, and Tongan, as well as Hawaiian.**

[4] Jennifer Kim, U.S. Census Bureau, Update on Language Services Operation (June 14, 2018), https://www2.census.gov/cac/nac/meetings/2018-06/kim-language-services.pdf.
[5] *Id* (see page 9 for list of 59 languages).

3. Additionally, **we request that the Census Bureau consider using the language glossaries and language assistance guides that it plans to create in 59 languages and turn them into online versions of the 2020 Census questionnaire for some or all of those languages.** We recognize that creating and printing millions of paper questionnaires in dozens of additional languages would create significant costs. But given that most or all of the verbiage on the questionnaire will already be translated for these language glossaries and language assistance guides, we assume the additional cost of creating an online questionnaire in these languages would not be significant. We ask that the Census Bureau evaluate how the cost of converting language glossaries and language assistance guides into online questionnaires compares to the added benefit of expanded access for Asian American and other language minority communities.

4. Finally, we believe that it is important to include in-language messaging in all mailings, whether for Internet First or Internet Choice treatment. In-language messages used on the advance letters in the 2000 and 2010 Censuses allowed people to indicate that they wanted to receive a questionnaire in a non-English language or provided information about where people could get more in-language information. Advocates, particularly those working in immigrant communities, believed that those messages were useful when engaging LEP community members. **We recommend that in all mailings to households about the 2020 Census, the Census Bureau include in-language messages that provide information to respondents about how to request a questionnaire in a non-English language, about how to get translated information to assist in filling out the census form on the 2020 census website, or about the Census Questionnaire Assistance phone numbers that provide in-language assistance.** Providing these avenues for language support up-front will help optimize self-response and remove potential cases from the Non-Response Follow Up workload.

We appreciate this opportunity to share our concerns and recommendations with respect to the 2020 Language Support Program. We are all committed to ensuring a fair and accurate count of all Americans and recognize that providing effective language support to AANHPIs is a key component of achieving that goal.

We request that you provide us with a reply to our recommendations, letting us know whether and/or the degree to which you can accept each, by November 23, 2018, one month from today. You can reach all of us by responding to Terry Ao Minnis, Director of Census and Voting Programs, Asian Americans Advancing Justice – AAJC, at tminnis@advancingjustice-aajc.org or (202) 815-4412. Many thanks for your consideration.

Sincerely,

18MillionRising.org
AFIRE (Alliance of Filipinos for Immigrant and Refugee Empowerment)
Angkor Resource Center, Inc. (ARC)
APAPA Albany chapter

Arab American Institute
Asia Pacific Cultural Center
Asian & Pacific Islander American Health Forum (APIAHF)
Asian American Bar Association of the Greater Bay Area
Asian American Federation
Asian American Organizing Project
Asian American Psychological Association
Asian Americans Advancing Justice - AAJC (Advancing Justice - AAJC)
Asian Americans Advancing Justice - Asian Law Caucus (Advancing Justice - ALC)
Asian Americans Advancing Justice - Atlanta (Advancing Justice - Atlanta)
Asian Americans Advancing Justice - Chicago ((Advancing Justice - Chicago)
Asian Americans Advancing Justice - Los Angeles (Advancing Justice - LA)
Asian Americans United
Asian and Pacific Islander American Vote (APIAVote)
Asian Community Development Corporation
Asian Community Development Council
Asian Counseling and Referral Service
Asian Health Services
Asian Law Alliance
Asian Pacific American Labor Alliance, AFL-CIO (APALA)
Asian Pacific American Network of Oregon (APANO)
Asian Pacific American Student Services (APASS)
Asian Pacific Development Center
Asian Pacific Environmental Network
Asian Pacific Islander American Public Affairs Association Austin TX Chapter
Asian Pacific Islander American Public Affairs Association Ohio Chapter
Asian Pacific Islander Americans for Civic Empowerment (APACE)
Asian Pacific Islander Initative
Asian Pacific Islanders Coalition of Washington (APIC-WA), South Puget Sound Chapter
Asian Pacific Policy and Planning Council (A3PCON)
Asian Services In Action
Asian Women for Health
Athens Immigrant Rights Coalition
AZ APIA Vote Table
BACDYS (Bangladeshi American Community Development and Youth Services)
Bangladeshi American Community Development and Youth Services
Bay Rising
Black Alliance for Just Immigration (BAJI-Atl)
Boston Chinatown Neighborhood Center
CAIR - Georgia
Cambodian Mutual Assistance Association of Greater Lowell, Inc.

Center for Pan Asian Community Services, Inc.
Chhaya CDC
Chinese American Progressive Action
Chinese Culture Connection
Chinese for Affirmative Action
Chinese Progressive Association
Chinese-American Planning Council, Inc.
Civic Education Alliance Inc.
Coalition for Asian American Children and Families
Council for Native Hawaiian Advancement (CNHA)
Council on American-Islamic Relations
De La Cruz-Viesca, Melany (Associate Director, UCLA Asian American Studies Center) (INDIVIDUAL)
Dignidad Inmigrante en Athens
East Bay Community Foundation
Emgage Action
Empowering Pacific Islander Communities (EPIC)
Ethnic Minorities of Burma Advocacy and Resource Center (EMBARC)
Faith in the Valley, Merced County
Filipino Advocates for Justice
Georgia Alliance for Social Justice
Georgia Association of Latino Elected Officials (GALEO)
Georgia Budget & Policy Institute
Georgia Muslim Voter Project (MVP)
HANA center
Hawaiian Community Assets
Hindu American Foundation
Indo-American Center
Indo-Caribbean Alliance, Inc.
Jakara Movement
Japanese American Citizens League, Arizona Chapter
Khmer Girls in Action (KGA)
Lao-American Organization of Elgin
Laotian American National Alliance
Latino Community Fund (LCF Georgia)
Little Manila Rising
Liwanag Kultural Center
Los Vecinos de Buford Highway
LWVVA
Massachusetts Voter Table
MassVOTE

MinKwon Center for Community Action
Monument Impact
NARAL Pro-Choice Virginia
National Asian Pacific American Bar Association (NAPABA)
National Asian Pacific American Women's Forum (NAPAWF)
National Asian Pacific American Women's Forum Arizona Chapter
National CAPACD
National Federation of Filipino American Associations (NaFFAA)
National Korean American Service & Education Consortium (NAKASEC)
National Pacific Islander Education Network
National Tongan American Society
NETMM
Network of Myanmar American Association
New American Pathways
NHPI // PIA
Northern California Grantmakers
OCA - Asian Pacific American Advocates
OCA San Mateo County
OCA St. Louis
OCA-Asian Pacific American Advocate
OCA-Greater Houston
Ohio Chinese American Association (OCAA)
Ohio Progressive Asian Women's Leadership (OPAWL)
OneAmerica
Orange County Asian and Pacific Islander Community Alliance (OCAPICA)
Papa Ola LÅ□kahi
Peninsula Conflict Resolution Center
Pennsylvania Immigration and Citizenship Coalition
Pilipino American Unity for Progress, Inc. (UniPro)
Project South
Raksha, Inc.
Refugee & Immigrant services NW
Refugee Women's Network (RWN), Inc.
Revere Youth in Action
Seek Jesus First Ministries
Services, Immigrant Rights & Education Network (SIREN)
South Asian Bar Association of Northern California
South Asian Network (SAN)
South Puget Sound Asian Pacific Islander Coalition (APIC)
Southeast Asia Resource Action Center (SEARAC)
Southeast Asian Coalition

Southeast Asian Educational Development of WI, Inc.
Southeast Immigrant Rights Network
Taulama for Tongans
The Greater Malden Asian American Community Coalition, Inc. (GMAACC)
Tongan American Youth Foundation (TAYF)
Union of Pan Asian Communities (UPAC)
United Chinese Association of Brooklyn, Inc.
Virginia Civic Engagement Table (VCET)
VN TeamWork, Inc.
Wah Lum Kung Fu and Tai Chi Academy
Wisconsin Voices
Women Watch Afrika, Inc.