



March 2, 2022

[2020DAS@census.gov](mailto:2020DAS@census.gov)

**Re: 2020 Census Detailed DHC-A**

Asian Americans Advancing Justice | AAJC (Advancing Justice | AAJC) is a national non-profit, non-partisan organization founded in 1991. For over thirty years, we have served as the leading Asian American voice on civil rights issues in our nation's capital. Our mission is to advance civil and human rights for Asian Americans and to build and promote a fair and equitable society for all. Advancing Justice | AAJC considers data collection and reporting to be the backbone of its mission.

Over the decades, we have worked to eliminate the barriers that have historically resulted in undercounting and underreporting Asian Americans and NHPs in federal data collection and analysis efforts, particularly in the decennial census count. Our permanent census program monitors census policy and educates policy makers—including through testifying at Congressional hearings. We conduct community outreach and education on the surveys conducted by the Census Bureau, including running nationwide Asian American-focused campaigns for Census 2000, Census 2010, and Census 2020. Advancing Justice | AAJC has also served as a member of numerous advisory committees to the Census Bureau since 2000. Most recently, we served on the National Advisory Committee on Racial, Ethnic and Other Populations, completing our second three-year term through August 2019. Additionally, Advancing Justice | AAJC currently co-chairs the Leadership Conference on Civil and Human Rights' Census Task Force and serves as a co-coordinator of the Census Count campaign.

Advancing Justice | AAJC considers a fair and accurate census and comprehensive ACS among the most significant civil rights issues facing the country today. Our wide-ranging efforts to promote civic engagement, forge strong and safe communities, and create an inclusive society are guided significantly by objective, inclusive data on America's diverse communities and populations. We appreciate the importance of fact-based analyses and the need for disaggregated, detailed data on our community for purposes of identifying disparate access and outcomes and devising effective solutions. To that end, we offer the following feedback on the Detailed DHC-A Proof of Concept.

## Overview

Detailed data are particularly critical for Asian Americans, who are among our nation’s fastest growing and most diverse racial groups.<sup>1</sup> Often viewed as homogenous, these communities include more than 30 detailed subgroups that can differ dramatically across key social and economic indicators.<sup>2</sup> While Indian Americans have an average poverty rate of 6%, Mongolian Americans and Burmese Americans have a poverty rate of 25%.<sup>3</sup> Roughly 75% of Taiwanese Americans hold a bachelor’s degree, yet only 14% of Laotian Americans do.<sup>4</sup> Another example can be found in health disparities. A study showed that “19.4% of Asian adults compared to 12.9% of whites report[ed] being without a usual source of health care, with Cambodian and Vietnamese [Americans] ... three times more likely to skip doctor visits due to cost compared to all Asian [Americans] or U.S. residents.”<sup>5</sup> The study further found that U.S.-born Vietnamese American women represent one of the highest risk groups for breast cancer; they are four times more likely to die of breast cancer than any other Asian American group. Moreover, Korean American children are four times more likely to have no health insurance as compared to others. Finally, disaggregating data on the prevalence of smoking in New York City showed that while the prevalence in smoking was lower overall in Asian Americans compared to whites (14.1% vs. 18.6%), the actual prevalence of smoking was much higher for some Asian American subgroups, such as 35.5% in Korean Americans.<sup>6</sup> And while Japanese Americans, Filipino Americans, and Indian Americans all have English language proficiency at or above 80%, only 36% of Bhutanese Americans speak English proficiently.<sup>7</sup>

Advancing Justice | AAJC appreciates that the Census Bureau recognizes the importance of producing disaggregated, detailed data for the 2020 Census because this data are critical to our diverse community. Given that the Bureau considered not producing such data due to privacy disclosure concerns, we applaud the Bureau’s decision to take an innovative approach to ensure it could indeed produce detailed data under the new Disclosure Avoidance System (DAS). However, there are also areas of concerns that we would like to bring to your attention.

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<sup>1</sup> <https://www.pewresearch.org/fact-tank/2021/04/29/key-facts-about-asian-origin-groups-in-the-u-s/>.

<sup>2</sup> <https://www1.nyc.gov/assets/immigrants/downloads/pdf/Fact-Sheet-NYCs-API-Immigrant-Population.pdf>.

<sup>3</sup> Id.

<sup>4</sup> <https://theconversation.com/asians-could-opt-out-of-naming-a-country-of-origin-on-the-2020-census-a-policymakers-nightmare-92714>.

<sup>5</sup> [https://www.pfizer.com/news/articles/health\\_disparities\\_among\\_asian\\_americans\\_and\\_pacific\\_islanders#:~:text=In%20fact%2C%2019.4%25%20of%20Asian,all%20Asians%20or%20U.S.%20residents.](https://www.pfizer.com/news/articles/health_disparities_among_asian_americans_and_pacific_islanders#:~:text=In%20fact%2C%2019.4%25%20of%20Asian,all%20Asians%20or%20U.S.%20residents.)

<sup>6</sup> Id.

<sup>7</sup> <https://www.pewresearch.org/fact-tank/2021/04/29/key-facts-about-asian-origin-groups-in-the-u-s/>.

## Accuracy and Usability

Having accurate data is necessary, but having usable data is equally important. We understand that the adaptive design allows for more control of noise injection and for the advance determination of all margins of error that are met 95% of the time. However, we also know that there are limitations to utilizing this methodology.

The population thresholds for detailed group reporting for 2020 is an improvement as compared to 2010. Detailed groups with populations of 22 or more and regional groups with populations of 94 or more at any given sub-state geography and American Indian/Alaska Native/Native Hawaiian (AIANNH) area will have data published for that geography in the 2020 Census (in contrast to the minimum population count of 100 in the 2010 Census). This means that for the 2020 Census, we should see tabulation of approximately 370 detailed racial and ethnic groups and 1,200 American Indian and Alaska Native tribes and villages. Clearly, this is more extensive than what was produced in 2010.

While there will be more detailed groups included in the data set, due to privacy concerns, the Detailed DHC-A and Detailed DHC-B will actually have fewer tables and levels of geography than in 2010. This is a significant setback. Higher levels of geography are not particularly useful when trying to identify and target areas and communities of concern – they are simply too large in many cases to provide the granularity needed. Thus, it would be ideal to produce data at the block group geography, even if it would only be for a subset of detailed groups.

It will be important for the Bureau to educate data users extensively about what to expect from these data sets, how to best use them, how not to use them, and how to best present these data. The Census Bureau must do more than releasing technical documentation with the final release of the Detailed DHC-A to achieve these goals. While technical documentation is an important standard to maintain, community-focused and data-user-focused educational materials are also needed to ensure the data are used properly and effectively by all. We must democratize access to data by making it accessible to audiences beyond technical and scientific experts .

One example of how the Bureau could better educate data users would be to address the fact that when aggregating data from the D-DHC tables, the data will generally become more variable the more they are aggregated. This will differ from other census data products and will not be intuitive to data users. The Bureau needs to do more than simply state that data users should use the published statistic they are interested in (when available) rather than aggregating data themselves. Moreover, the Bureau must go beyond warning users to exercise caution when aggregating data for custom geographies—a common practice among data users. The Bureau

must provide guidance on what can and cannot be done with the data, what other methods can be utilized achieve the data of interest, and the best and most appropriate way to present the data.

Additionally, certain groups that meet specific thresholds will be eligible for age by sex data. The amount of detailed age by sex data will be based on the size of the group. At the same time, some groups will be too small to receive a sex by age table in 2020 and will only receive total population data at the national and state level. It is laudable that the Census Bureau is trying to provide as much data as possible under their adaptive design. But it will be important that the design is well explained so that people understand why they are seeing what they're seeing, including that which is hidden or excluded. That is, it will be important for people to understand why some detailed groups have age by sex data and others do not. Similarly, the Bureau needs to explain why some detailed groups have more detailed age and sex data than others. Without proper guidance and education, some may infer ill intent for why some groups have access to certain data while others do not.

Similarly, the Bureau must educate data users about the fact that the Detailed DHC-A will not be consistent with other 2020 Census data products. Providing community-focused educational materials that are easily understood will be key to ensure data users know which data products to use, for what purposes and how best to use them. This will help to ensure that census data are used appropriately and to minimize inappropriate uses of census data that could call into question the legitimacy of data collected.

### **Classifications of Racial and Ethnic Detailed Groups**

Advancing Justice | AAJC values that the Bureau is looking to report on data for regional groups for the first time in 2020. Regional groups include groups such as Caribbean, East Asian, American Indian, Polynesian, and so forth. Because these data points were not published in 2010, this could be particularly helpful especially if additional data points are provided that would otherwise not meet the population threshold for individual detailed groups..

However, the current Race and Ethnicity Codes in Appendix F of PL94-171 Redistricting Summary File Technical Documentation and the anticipated coding for the Detailed DHC-A include an incorrect regional classification for the Hmong American community. As flagged in the sign-on letter of 57 Hmong American; Southeast Asian American; and Asian American, Native Hawai'ian, and Pacific Islander organizations sent on March 2, 2023, Hmong is incorrectly included in the East Asian regional group. As the letter stated, "Hmong Americans' origins are as refugees from Southeast Asia [and that] Southeast Asian American (SEAA) is not only a geographic identity, but also a political identity that comes from the shared experiences of people who came to this

country as refugees from Cambodia, Laos, and Vietnam.” The letter further finds, “The U.S. Census Bureau’s own data describes this history. According to the American Community Survey, nearly all foreign-born Hmong Americans migrated from Southeast Asia, which the Bureau defines as including the following countries: Myanmar, Cambodia, Indonesia, Laos, Malaysia, Philippines, Singapore, Thailand, and Vietnam. The most recent American Community Survey estimates show that 95.6% of Hmong Americans reported Southeast Asia as their region of origin, while only 1.6% reported East Asia.” In addition to the community’s understanding of Hmong as Southeast Asian Americans, this is also well-established in the academic literature.<sup>8</sup>

The Census Bureau must immediately rectify this error and reclassify Hmong in the Southeast Asian regional group for its data products past and future.

### Need to Actively Engage Impacted Communities

The Census Bureau must do a better job of actively engaging impacted communities to ensure that their policies and decisions align with how communities self-identify. The Bureau must provide communities with the tools they need to effectively utilize census data. For example, had the Census Bureau consulted any one of the 57 groups from the sign-on letter, it would have been quite evident that the community identifies as Southeast Asian, not as East Asian. These groups include national advocacy organizations that work on behalf of, and are led by, members of the community. It will be important for the Bureau to engage with a diverse set of interested stakeholders, including academics and groups that serve the impacted communities.

The Bureau should also make sure to engage a diverse range of stakeholders as it develops community-focused educational materials that explain the Detailed-DHC datasets in easily accessible language, with extensive examples of what to do and what **not** to do with these data. Engaging with community groups will provide the Census Bureau an opportunity to utilize communities as informal focus groups, allowing the Bureau to fine-tune their materials to ensure they are as accessible as possible.

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<sup>8</sup> For a selection, see, Wayne Carroll, “Economic Progress of Hmong Americans: The First Twenty-Five Years,” *Hmong Studies Journal* 23 (January 2021): 1–49, accessed March 2, 2023, <https://search-ebSCOhost-com.proxygw.wrlc.org/login.aspx?direct=true&db=a9h&AN=154703458&site=ehost-live>; --- and David Schaffer, “Employment and Wages of Hmong and Other Southeast Asian Refugees in the United States,” *Journal of Immigrant & Refugee Studies* 19, no. 4 (2021): 526–539; Bic Ngo and Stacey J. Lee, “Complicating the Image of Model Minority Success: A Review of Southeast Asian American Education,” *Review of Educational Research* 77, no. 4 (2007): 415–453; Arthur Sakamoto, John Iceland, and Thomas Siskar, “The Socioeconomic Attainments of Second-Generation Southeast Asian Americans in the 21st Century: Evidence from the American Community Survey, 2012–2016,” *Population Research and Policy Review* 41, no. 1 (2022): 59–88.

## Conclusion

We appreciate the opportunity to provide comments on the 2020 Census Detailed DHC-A and the Proof of Concept. Please feel free to contact me at [tminnis@advancingjustice-aaajc.org](mailto:tminnis@advancingjustice-aaajc.org) or (202) 815-4412 if you have any further questions.

Sincerely,



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