



ASIAN AMERICANS
**ADVANCING
JUSTICE**

AAJC

VIA EMAIL

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Re: Soliciting Input or Suggestions on 2030 Census Preliminary Research

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Asian Americans Advancing Justice (Advancing Justice) offers comments to the Federal Register Notice, Soliciting Input or Suggestions on 2030 Census Preliminary Research (87 FR 50599). Advancing Justice, a national affiliation of five independent nonprofit organizations dedicated to serving our nation's most rapidly growing racial minority communities actively works to ensure a fair and accurate count during the census because of the importance of census data to Asian Americans, Native Hawaiians, and Pacific Islanders (AANHPIs). The Advancing Justice affiliation is comprised of our nation's oldest Asian American legal advocacy center located in San Francisco (Advancing Justice – Asian Law Caucus), our nation's largest legal and civil rights organization for Asian Americans, Native Hawaiians, and Pacific Islanders located in Los Angeles (Advancing Justice – Los Angeles), the largest national Asian American policy advocacy organization located in Washington, D.C. (Advancing Justice – AAJC), the leading Midwest Asian American advocacy organization (Advancing Justice – Chicago), and the Atlanta-based Asian American advocacy organization that serves one of the largest and most rapidly growing Asian American communities in the South (Advancing Justice – Atlanta).

Together, Advancing Justice has been working to eliminate the barriers that have historically resulted in the undercounting and underreporting of AANHPIs in federal data collection and analysis efforts, particularly in the decennial census count. Advancing Justice has conducted extremely successful national, state, and local outreach and educational projects focused on the AANHPI communities for Census 2000, Census 2010, and Census 2020. Advancing Justice considers a fair and accurate census and comprehensive ACS among the most significant civil rights issues facing the country today. We appreciate the importance of fact-based analyses

for identifying disparate access and outcomes and devising effective solutions. To that end, we offer the following comments regarding the 2030 Census preliminary research agenda.

Reaching and Motivating Everyone

Need to focus on reaching Asian Americans and Native Hawaiians and Pacific Islanders (AANHPIs)

We agree that the Census Bureau should focus on how to reach the Black or African American population, the American Indian or Alaska Native population living on a reservation, the Hispanic or Latino population, people who reported being of Some Other Race, and young children – groups for whom the 2020 Post-Enumeration Survey (PES) and Demographic Analysis estimates suggested undercounts in 2020. At the same time, we cannot ignore AANHPIs in the decennial census and other census surveys.

We assume that AANHPIs were not included because the metrics used by the Census Bureau to assess the accuracy of the census (i.e., Demographic Analysis and the 2020 Post-Enumeration Survey) allegedly showed that these communities were accurately counted in the 2020 Census. However, we argue that those data points are merely pieces of a larger puzzle that includes more granular information about the accuracy of AANHPI counts at lower geographies and should not be taken as fact indicative that our communities were accurately counted in 2020. Demographic Analysis, long touted as the only truly independent measure of decennial census quality, is silent on coverage for AANHPI communities. The Post-Enumeration Survey only provides a glimpse at the coverage for AANHPI communities at the national level. The lack of sub-national data on census coverage for these communities leaves everyone guessing about the true nature of coverage for these groups.

This is especially important given the geographic and ethnic diversity of AANHPI communities. Even though there may be an overcount at the national level, that does not mean that all AANHPI communities were overcounted. Advancing Justice | AAJC will publish an upcoming report that compares the postcensal population estimates with the decennial census to determine what census accuracy may have looked like in the 2020 Census for AANHPI communities. The analysis aligns with the PES in some decades and departs from others. More importantly, there are significant regional differences when the report looked throughout the country in terms of potential net undercounts and overcounts. The report found undercounts in some areas of the country are canceling out overcounts elsewhere. Thus, the community's count at the national level may be at the expense of capturing the true nature of the count at the local level.

In addition to the findings in Advancing Justice | AAJC's report, our knowledge of census messaging research points to the need to include AANHPIs in the list of groups of concern for the 2030 Census. Census messaging research, conducted by the Census Bureau and outside partners, consistently finds that Asian Americans tend to be the least educated about the census and among those likely to have the highest level of concern or suspicion about the

census. For example, in focus groups of Asian Americans conducted for the 2010 Census, many indicated a lack of awareness about the census and had not heard of the Census Bureau.¹ Indeed, many found the idea of the census not only confusing, but invasive and potentially threatening. The Asian American focus groups further noted a lack of understanding about the purpose of the census, how the data are used, and any direct benefit to them or their community from participating. Lastly, Asian Americans noted that barriers to census participation included English-language proficiency issues and the lack of availability of in-language materials. Similar findings came out of the focus group research for the 2020 Census.² Asian American and NHPI focus groups found that the following barriers existed to their community's participation in the census: confidentiality and privacy concerns; lack of knowledge or understanding of purpose; apathy toward the census and lack of efficacy; inclusion of citizenship question; fear of repercussions; online data security concerns; frauds and scams; and language barriers.

These findings were further supported by survey messaging research conducted by the Census Bureau and Advancing Justice | AAJC for the 2020 Census. The Census Bureau's own Census Barriers, Attitudes, and Motivators (CBAMS) found that Asian Americans and small-sample size races were least likely to report their intention to respond to the census. CBAMS also found that Asian Americans and small-sample races were among those least likely to report that being counted in the 2020 Census mattered for them, that Asian Americans tended to be less familiar with the census than other groups, and that Asian Americans, householders not proficient in English, and those born outside of the U.S. were the most concerned that their answers to the 2020 Census would be used against them.³ These are consistent findings from census to census and we should expect them to continue in the future. Therefore, it is important to continue focusing on how to engage AANHPIs for the 2030 census.

Need to Modernize Race and Ethnicity Data Collection and Reporting

We reiterate our disappointment that the Census Bureau did not utilize the question format that was most successful in its 2015 National Content Test (NCT) for the questions on race and ethnicity on the 2020 Census. The version tested in the 2015 NCT that solicited the best response and was the forerunner for implementation in the 2020 Census featured a combined question with detailed checkboxes format for each racial and ethnic group, a Middle Eastern or North African (MENA) category, and the ability for everyone to select multiple checkboxes, including for the Hispanic options (which was not available on previous

¹ U.S. Census Bureau, *Ethnic and Racial Sub-Population Focus Group Research* (2007), <http://www.census.gov/procur/www/2010communications/final%20report%20-%20asian%20&%20arab-american.pdf> (provides detailed findings from focus groups on the following populations: Korean, Vietnamese, Cambodian, Filipino, Laotian, Chinese, Arab, Multi-Racial and Caucasian).

²<https://www2.census.gov/programs-surveys/decennial/2020/program-management/final-analysis-reports/2020-report-cbams-focus-group.pdf>

³<https://www2.census.gov/programs-surveys/decennial/2020/program-management/final-analysis-reports/2020-report-cbams-study-survey.pdf>

census forms).⁴ In light of the extensive existing research conducted by the Census Bureau around modernizing the race and ethnicity questions, the Bureau should update the way they ask about race and ethnicity for the 2030 Census. By better reflecting individuals' complex identities and offering more inclusive choices, the Census Bureau can motivate more people to respond.

There is overwhelming support for the inclusion of specific checkboxes for Asian American and NHPI subgroups within the Asian American and NHPI communities. Collecting detailed data is particularly critical for AANHPIs, who are among our nation's fastest growing and most diverse racial groups.⁵ Often viewed as homogenous, these communities include more than 50 detailed subgroups that can differ dramatically across key social and economic indicators. Among Asian Americans, only 6% of Filipino Americans nationwide live below the poverty line, compared to 26% of Hmong Americans.⁶ Among NHPIs, about 49% of Marshallese Americans live below the poverty line, compared to only 5% of Fijians Americans.⁷ Roughly 73% of Taiwanese Americans 5 years or older hold a bachelor's degree, yet only 12% of Laotian Americans do.⁸ Similarly, while almost 18% of NHPI adults overall have a bachelor's degree, only 3% of Marshallese Americans do.⁹ Another example is pay equity. While AANHPI women are paid an average of 86 cents for every dollar a white man is paid, disaggregated data demonstrate that, for example, Native Hawaiian women are paid only 66 cents for every dollar a white man is paid; for Vietnamese, Laotian, and Samoan American women, 61 cents; for Burmese American women, 53 cents; and for Bhutanese American women, only 38 cents.¹⁰ Without accurate data by detailed subgroup, some of the most disadvantaged in our communities are rendered invisible to policymakers, leaving their critical needs unmet.

The use of inclusive checkboxes for Asian American and NHPI subgroups is supported by the results from the 2015 National Content Test (2015 NCT). The research showed that the combined question with detailed checkboxes performed better than the combined question with write-ins for all modes of responses for the decennial census.¹¹ We believe that

⁴ U.S. Census Bureau, 2015 National Content Test Race and Ethnicity Analysis Report, Table H31, 299 (2017), <https://www2.census.gov/programs-surveys/decennial/2020/program-management/final-analysis-reports/2015nct-race-ethnicity-analysis.pdf> [hereinafter "2015 NCT Report"].

⁵ Bill Chappell, *Census Finds A More Diverse America, As Whites Lag Growth*, NPR (June 22, 2017), <http://www.npr.org/sections/thetwo-way/2017/06/22/533926978/census-finds-a-more-diverse-america-as-whites-lag-growth>; Press Release U.S. Census Bureau, "2010 Census Shows Asians are Fastest-Growing Race Group (March 21, 2012)", https://www.census.gov/newsroom/releases/archives/2010_census/cb12-cn22.html.

⁶ Asian Pacific American Legal Center & Asian American Justice Center, *A Community of Contrasts: Asian Americans in the United States: 2011*, 36 (2011), http://www.advancingjustice.org/pdf/Community_of_Contrast.pdf [hereinafter "Asian American Report"].

⁷ Asian Americans Advancing Justice & Empowering Pacific Islander Communities, *A Community of Contrasts: Native Hawaiians and Pacific Islanders in the United States*, 2014, 18 (2014), http://empoweredpi.org/wp-content/uploads/2014/06/A_Community_of_Contrasts_NHPI_US_2014-1.pdf [hereinafter "NHPI Report"].

⁸ Asian American Report, 31.

⁹ NHPI Report, 11.

¹⁰ Miriam Yeung, American Association of University Women, *Overcoming the "Model Minority" Myth: AAPI Women Are Not Paid Equally* (Mar. 15, 2016), <http://www.aauw.org/2016/03/15/aapi-equal-pay-day/>.

¹¹ 2015 NCT Report, 299 (Table H31).

utilization of checkboxes and examples is critical regardless of the format of the question(s) for all surveys.

The race question used for the 2020 Census harmed NHPs. The recommended combined question panel from the 2015 NCT allowed for more detailed checkboxes (Tongan, Fijian, and Marshallese) and more examples for the “Other NHP” option (Palauan, Tahitian, and Chuukese). These checkboxes and examples are lost with the retention of the two-question format question and the question on race utilized for the 2020 Census and should be used moving forward. Another missed opportunity with the 2020 Census race question was that NHP response options are not clearly identified as separate from Asian American response options – the recommended combined question had two options and detailed checkboxes (for American Indians and Alaskan Natives, as well as for Middle Eastern North African) between Asian and NHP response options. The 2020 Census race question once again has Asian and NHP response options side by side without any labeling above the detailed checkboxes. Moving forward, the Census Bureau should add additional options and provide more clarity in how NHPs should answer the question.

The 2020 Census race question also did not include a Middle Eastern or North African (MENA) response option, even though the 2015 NCT test panels that included two questions with a MENA response option. Advocates from the Arab American community, other MENA communities, and the civil rights community, among others, supported distinct reporting categories for the MENA community for many decades. Current OMB guidelines that classify persons from the MENA region as white are not accurate or useful and are increasingly confusing to survey respondents as well as government agencies tasked with collecting information on, and providing services to, these populations. The 2015 NCT results show that when a distinct MENA category was present, there was a significant decrease in MENA responses for all other categories, including “Some Other Race”.¹² Testing has consistently reaffirmed that most members of this community do not see themselves in a “White” racial classification. The MENA category is practical and necessary. It will provide the government the ability to measure the community’s access to resources, the community’s needs in law enforcement, hospitals, schools, employment, and so forth, and the degree of disparate treatment experienced by the community. For the 2030 Census, the Census Bureau should add a MENA response option.

Finally, the Census Bureau’s failure to adopt a combined race and ethnicity question that allows respondents to provide multiple subgroup identifications for Latino ethnic category was another missed opportunity in 2020. The Census Bureau’s own research has shown that a significant portion of Latinos do not identify with the racial categories included in a separate race question. In 2010, 97% of the 19.1 million people who identified as “Some Other Race” were Latino. Using a combined question to ask about race and ethnicity resulted in a dramatic decline in “Some Other Race” responses. Latino respondents were more likely

¹² 2015 NCT Report, 59.

to convey their Latino ethnicity, and less likely to self-identify as White, when given a survey with a single combined race and ethnicity question.

Additionally, the separate-questions format used in the 2010 census did not allow for the reporting of multiple national Hispanic origins, which has been shown to result in the loss of detailed Hispanic origin information. In response to a differently-formatted ethnicity question on the 2000 decennial Census, the Bureau observed that more than 260,000 respondents attempted to report multiple Hispanic origin responses. Thus, the decision not to allow for the marking of multiple Hispanic origin responses for the 2020 census is a loss, not permitting detailed information about origin. This should be rectified for the 2030 Census.

Need to Better Understand Race and Ethnicity Data

The Census Bureau should conduct research to compare race and ethnicity findings from 2020 Census data and 2010 Census data. The Census Bureau has noted that they continue to evolve and refine their approach to race and ethnicity data, including changing the way they coded responses for the 2020 Census. The Bureau has been clear that the race and ethnicity data produced for 2020 is not an apples-to-apples comparison to data from 2010. Therefore, the Bureau should provide guidance on how to make comparisons between 2010 and 2020 census data. The Bureau should conduct further research to better understand the impact of these changes on the data, such as what impact decisions about coding Some Other Race Responses may have had on multiracial responses.

Moreover, the Census Bureau should develop clear guidance to data users on how to bridge data collected through separate race and Hispanic origin questions if the Census Bureau and other agencies use a combined question going forward. The ability to compare race and ethnicity data over time is critical to our work, including civil rights enforcement. Protocols and guidance for re-aggregating data, or “bridging” sets of data collected through different formats are critical, such as through trainings, webinars and video tutorials.

Need to improve engagement and advance data inclusion for LGBTQI+ communities

Existing research reveals that LGBTQI+ people face disparate and inequitable treatment, which adversely affects outcomes across key areas of everyday life, including health status; access to health care and health insurance; economic and housing security; educational attainment; and family and social support. These effects are even more severe for transgender individuals, LGBTQI+ people of color, LGBTQI+ people with disabilities, LGBTQ youth, and LGBTQI+ older adults. Although knowledge of the disparities that LGBTQI+ communities face has increased in recent years, significant gaps – driven by lack of reliable data – remain. Much of the evidence base relies on data gathered through community or non-Federal statistics or data collection. A dearth of consistent, large-scale sexual orientation, gender identity, and variations in sex characteristics (SOGI-SC) data collection by federal and state governments poses a barrier to obtain adequate data about the diversity of LGBTQI+ experiences, and to better comprehend and address disparities.

Collecting SOGI-SC data in the decennial census will bring visibility to the experiences of LGBTQI+ people, ensure their needs are reflected in government policies, programs, and funding investments, and support data-driven research and evidence-based policymaking to address existing disparities and discrimination. More reliable, quality data that allow for disaggregation by sexual orientation, gender identity, variations in sex characteristics, race, ethnicity, disability, age, and other key demographic variables are needed to better understand the experiences of those living at the intersections of multiple marginalized identities. For these reasons, the Census Bureau should:

1. Engage in research and testing to propose ways to measure SOGI-SC for the 2030 Census.

There are statutory and civil rights enforcement requirements for data collection about LGBTQI+ people, so that federal agencies and civil rights offices, in particular, can enforce the law. Multiple federal agencies have submitted formal requests to the Census Bureau explaining the legal and programmatic need for SOGI-SC questions to be included on the American Community Survey and for the 2020 Census, thereby formally initiating the process of adding new questions. Since then, the legal need for SOGI-SC data inclusion has only become stronger and the Biden-Harris Administration has signed multiple executive orders highlighting the need to enforce nondiscrimination protections on the basis of SOGI-SC and advance data equity for LGBTQI+ communities.

2. Support the public by directly participating in educational outreach and community engagement to encourage responses by LGBTQI+ people, reduce distrust, and improve population coverage.

If implemented, the 2030 Census will be the first time many LGBTQI+ people will have been asked about their SOGI-SC by the federal government. Many people will be excited to be counted and to see their full selves reflected in the count of the nation's population. At the same time, many LGBTQI+ people live in places that lack explicit nondiscrimination protections. Worse, some live in places where their ability to access vital medical care, to seek best practice medical care for their children, and to discuss LGBTQI+ topics in schools are under attack. For this reason, the Census Bureau must invest in community education and engagement, working closely alongside trusted LGBTQI+ organizations and spokespeople.

Technology

Need to improve and develop new technology to make online response more user-friendly

The Census Bureau should use innovative technology to make responding to the census faster and easier for everyone. The bureau should conduct user-centered design research to develop intuitive and time-saving processes for the self-response portal, and research

reasons for non-completion and points of disengagement. These findings should inform the development of new tools such as pop-up response guidance embedded within the online form. It might also include automatic prompts delivered via email, text, or phone call to encourage completion of the survey if a respondent leaves the online survey unfinished. The bureau should also analyze non-ID response rates through the online portal and research more effective methods to accommodate non-ID responses.

Recognizing how quickly technology evolves and changes, the Census Bureau should not lock themselves into technology that may be obsolete by the time the 2030 census is taken. Rather, the Bureau should develop protocols and processes that will allow them to be technologically nimble and flexible.

Finally, the Census Bureau should research how best to utilize technology to increase language access for respondents, including increasing the number of languages that can be supported for online responses and potentially including audio prompts.

New Data Sources

Utilizing Direct Services Organizations for Supplementary Data

The Census Bureau should consider working more closely with direct service organizations to collect supplementary data on hard-to-count populations. For example, many food pantries and soup kitchens already collect some data on their beneficiaries' household size and demographics. Partnering with these groups may lead to useful data insights, as well as more opportunities for the Bureau to spread awareness about the Census among underrepresented households. The Bureau should also consider incorporating data from state agencies that administer the Supplemental Nutrition Assistance Program (SNAP), if it does not do so already. SNAP applications inquire about the number of household cohabitants, including young children, and likely contain more up-to-date information about household size.

Caution against Overreliance on Administrative Data

We are concerned about the potential overreliance on administrative data, particularly any plans to supplant self-response by respondents during any aspect of census taking. Racial disparities in administrative records have been documented in different contexts, such as in healthcare and policing. Any disparities in administrative records would be carried over if used excessively and aggressively in the decennial census. This is particularly problematic for smaller population groups who are more likely to be missed and less likely to be captured in administrative records.

Additionally, due to the lack of standardization across administrative databases on how race and ethnicity data are reported and collected, a large portion of our community could potentially be missed through the use of administrative data. In many datasets, "Asian" and

“NHPI” responses are lumped into an “Other” category, making it impossible to determine which individuals would identify as Asian American or NHPI. Outside of the data produced by the Census Bureau, detailed data on Asian American and NHPI subgroups are simply unavailable. Thus, the use of administrative data leaves a large portion of our community at risk of being missed in these surveys, particularly as it relates to detailed data being collected. We are especially concerned about the potential use of commercial sources for data since commercial data are of greatly lower quality than governmental data with respect to our community.¹³ This means that any design that relies on administrative records in lieu of self-response and/or in-person non-response follow-up, as well as the use of commercial data except for in the most limited of ways, is highly problematic.

Any efforts to use administrative records more extensively, especially as it relates to enumeration, must be rigorously tested. There must also be significant engagement with census stakeholders about such usage. As the Bureau continues to explore using administrative records more extensively, the Bureau should be guided by the principle of using administrative records sparingly. Moreover, the Bureau must only use administrative records when it is confident in the quality of the data provided through the records and the coverage of the data across different communities—particularly those who are traditionally hard to count and that the administrative record can provide responses to all questions asked in the decennial form as it designs for the 2030 Census.

Improving Existing Data Sources The Bureau Relies Upon

In addition to seeking new data sources, the Bureau should research how it can improve the current data used to assess census accuracy. In particular, the Census Bureau should research new or alternative measures of census accuracy that produce more granular estimates for race and ethnic subgroups and other key demographic characteristics. The Bureau should also research how to cover more of the population, including people living in Group Quarters.

As previously noted, existing measures of accuracy are limited in what they can tell us about how accurately AANHPIs were counted in a decennial census. Understanding the differential coverage of Asian Americans and NHPIs—when compared to other racial and ethnic groups and when better understanding the internal variation in coverage within the Asian American and NHPI communities—allows for enhanced planning and outreach for the next decennial census. Further, without a detailed understanding of regional and subgroup variation in coverage, it is near impossible to spend the finite funds that the Census Bureau and their advocacy and local government partners bring to the table, ensuring the best overall count for both of these communities.

The Census Bureau should undertake research on how the AA and NHPI communities can be better integrated into Demographic Analysis, which currently does not speak to AANHPIs.

¹³ See Burton Reist, U.S. Census Bureau, 2010 Census Match Study Report (Nov. 19, 2012), https://www.census.gov/content/dam/Census/library/publications/2012/dec/2010_cpex_247.pdf.

There are sufficient data on these groups, even if they must be combined, to better understand the count for the AA and NHPI communities. Specifically, the Census Bureau could examine if the data in pre-1997 OMB race categories for births and deaths as well as those in the post-1997 categories could be used to create either a combined estimate for the net under- or over-count of the AANHPI community, or for separate estimates. These estimates would likely only be available for a subset of the population, much like the Census Bureau does for the Hispanic / Non-Hispanic Demographic Analysis estimates. But they would still be immensely useful for better understanding the quality of the decennial census for the AA and NHPI communities and for better planning for future censuses.

The Bureau should also explore how it can provide more granular data through its Post-Enumeration Survey in 2030. One critical data point is the undercount rates by racial and ethnic groups for each State. The current practice of only providing racial and ethnic undercount rates at the national level is of limited utility, as noted above. Another way to expand the utility of racial and ethnic undercount data is to include racial and ethnic undercount rates of larger sub-state jurisdictions. When coupled with the state-by-state racial and ethnic undercount data, this will provide communities a more fulsome understanding of how accurately their communities were counted. It could allow for some sharing of data for smaller populations who are concentrated in larger sub-jurisdictions in particular states.

How the Bureau Contacts Respondents

Importance of Partnership Program and Communications to Communicate with Hard-To-Count Asian American Communities and Optimize Self-Response

The census partnership and outreach programs for the 2000 Census and the 2010 Census were critical to achieving some of the most accurate counts for many of our hard-to-count communities. They were also critical to mitigate the unique challenges facing the 2020 Census (i.e., the Covid-19 pandemic and the unprecedented politicization of the decennial census, including the citizenship question).

Partnerships with hard-to-count communities reduce non-response follow-up costs. This is achieved through government leaders, school leaders, faith-based leaders, and other community leaders directly communicating with their members about the importance and benefits of participating. Respondents interacting with trusted leaders, rather than with a stranger representing the federal government, are more willing to participate.

But to reap the benefits of a partnership program, advanced planning (and funding) is necessary. The Census Bureau needs time to conduct outreach to the organizations for the partnership program as well as to reach out to local governments and engage them in these efforts. Time is also needed for the community-based organizations (CBOs), schools, churches, and other partner groups to gear up for their outreach campaign to their constituents, and for them to raise the funds needed for the outreach work from local

philanthropies and other sources. Advanced planning is particularly important for outreaching in communities of color. The growing privacy concerns and distrust of the Census Bureau among hard-to-count communities, the growing diversity in the country, the hostile climate to certain communities, and the general distrust of government make a strong and vibrant partnership and outreach program even more necessary for an accurate count in 2030. To best service this need, the Bureau should invest in a continuing partnership program throughout the decade to keep partners engaged.

In addition to the partnership program, the communications campaign played an important role in reaching hard-to-count communities in the 2000, 2010, and 2020 Censuses. Media is an important tool in communicating with hard-to-count Asian American communities. In particular, utilizing ethnic media¹⁴ is the most effective way to reach a substantial part of Asian American communities. Online media, including social media, is a good opportunity for reaching Asian Americans. The Bureau should invest in utilizing social media in different communities, which necessitates a better understanding by the Bureau about the different platforms used by communities, especially those that may be community-specific and may be in-language. This investment must be an ongoing year-in, year-out investment so that the Bureau can nimbly respond to meet the community where it (virtually) is. At the same time, there are those in the community who are not internet proficient and lack access to computers, such as AANHPI seniors.

While these are channels by which AANHPIs can be reached, because AANHPIs vary generationally any communications or marketing plan must be multi-faceted to address the needs of the various ethnic groups, various languages, and various generations. Each individual subgroup has intrinsic characteristics that require nuanced customization in messaging, treatment, and media vehicles. In addition, there are multiple factors that pose additional challenges for reaching the especially hard-to-count AANHPI communities. For example, while a majority of AANHPIs are concentrated in metropolitan areas, there are AANHPI segments located in remote rural and urban areas. In addition, immigrant communities often have cluster presence as opposed to a significant mass composition. Another factor is that some subgroups may experience high levels of illiteracy levels, making it important to invest in ways to reach this segment of the population.

The Census Bureau should continue to conduct research on census messaging throughout the decade, while planning to conduct another extensive messaging research study (i.e., CBAMS) for the 2030 census. The Bureau should plan to expand the diversity of focus groups, ensure it has the sample size needed to speak to different racial and ethnic groups and subgroups (and other hard-to-count factors such as immigrants), and must include AANHPIs as groups of focus.

¹⁴ New America Media, *National Study on the Penetration of Ethnic Media in America* (2009), available at http://media.namx.org/polls/2009/06/National_Study_of_the_Penetration_of_Ethnic_Media_June_5_2009_Presentation.pdf (media directed toward a specific ethnic group and often written or broadcast in a language native to the group (e.g., Chinese-language newspapers or Asian television stations)) (*hereinafter* "New American Media Study").

The Census Bureau must properly invest in its partnership and communications plans, including ensuring adequate funding, providing enough lead time to properly develop and implement its plans and developing plans that account for all persons in all communities, especially those hardest to count.

Expanded and Targeted Engagement

To maximize the participation of hard-to-count communities, the 2030 Census should engage more local community-based organizations in areas that are known to be underrepresented in the Census count. During the most recent redistricting and election cycle, our organizations worked directly with various immigrant, lower-income, and limited English proficient (LEP) communities, including some that were located in very rural areas. These groups may be hard to count because of language barriers, lower trust/willingness to interact with external visitors, limited experience with online surveys and technology, and/or concern that any information shared may be used against them. Some of the more rural communities we have worked with are also geographically remote, lack mailing addresses, and have poor Wi-Fi/cell connectivity.

For communities like these, the Census Bureau should partner with local organizations to find trusted "community champions" who can help organize a more effective, accurate count on the ground. Census-related outreach will be more effective when it comes from trusted community organizations or individual community leaders, as opposed to external groups or government agencies. Younger community leaders who are more familiar with online surveys and technology may be ideal candidates for this role. The Bureau should equip these local organizations with tools to help overcome any barriers that are specific to their community. For example, the Bureau should consider providing translated surveys in a wider variety of languages or equipping local organizations with mobile hotspots when they survey areas that lack internet connectivity.

Need to Research How to Improve Operations Regarding Responses

The Bureau must develop better protocols and processes to provide real-time updating about who has been reached and has responded to the census. We heard plenty of anecdotes during the 2020 Census about households that continually got follow-up contact by the Census Bureau even after filling out a census survey, whether through the self-response phase or during NRFU. This created significant frustration and confusion on the ground by respondents and may have affected the accuracy of the census by potentially creating duplicate responses for certain households. With the additional response options (i.e., online and telephonic options), it is necessary for the Census Bureau to research ways to improve their protocols and processes to provide real-time updating about responses, as well as how to engage the public in these instances (both through a communications campaign to educate the public and through its training program of temporary census takers).

Respondent Support Services

Improving and Ensuring Effective and Expansive Language Support

The success of the 2030 Census will depend on the full participation and cooperation of all segments of the American people, including the immigrant community, particularly those who are limited English proficient (LEP) and/or linguistically isolated. The Census Bureau must optimize non-English questionnaire designs and response options for LEP populations and ensure cultural appropriateness and relevance in all materials through its language support program. This is critical for AANHPIs, who have large segments of their populations that speak a language other than English at home (72% of Asian Americans and 40% of NHPIs) and high levels of limited English proficiency (LEP), (31% of Asian Americans and 12% of NHPIs).

The Bureau must continue to improve its language support program for 2030. We saw improvements with 2020 Language Support Program as compared to the 2010 Census Language Support Program, such as a lower threshold to trigger language support that resulted in more language coverage for the online 2020 Census and telephonic support. But there were still gaps in the 2020 Language Support Program. While some languages were added to the list of covered languages, we also saw the loss of coverage compared to the 2010 language support program. There is only one American Indian language covered (Navajo), no Alaskan Native languages, and no NHPI languages. For the 2010 list of languages, 9 additional languages were selected based on requests made by specific Race and Ethnicity Advisory Committees. There was no such opportunity for interested and knowledgeable stakeholders to provide input for language support for communities that had high needs in 2020. There must be an opportunity for public engagement to inform what languages are included for language support and what level of support is needed.¹⁵

The failure to include any language support for NHPI languages was particularly problematic. Advancing Justice – AAJC’s own census messaging research found that, among NHPIs, knowledge about the upcoming 2020 Census was low (27%), participation in past census was low (53%), and there was strong interest in completing a form online in their language of choice. Our research also showed that overall 1 in 3 NHPIs are misinformed about who should participate in the census, with 33% believing that only US citizens are supposed to fill out the form.¹⁶ The Census Bureau’s own CBAMS research showed that NHPIs had many barriers to participation in the 2020 Census. These include confidentiality and privacy concerns; lack of knowledge or understanding of purpose; apathy toward the census and lack of efficacy; inclusion of citizenship question; fear of repercussions; online data security

¹⁵ The Census Bureau ignored recommendations from AANHPI community and Congressional offices on the importance of strengthening the language support program for the 2020 Census, including the complete lack of support for NHPI languages and the significant need in the community. These recommendations were shared through NAC meetings, a community-based letter with 136 signatories from organizations across the country serving AANHPIs, a bicameral letter from the Congressional Asian Pacific American Caucus, led by CAPAC Chair, Congresswoman Judy Chu and Senator Brian Schatz with 22 Congressional signatories and a letter from seven Senators, led by Senator Schatz.

¹⁶ Asian Americans Advancing Justice – AAJC’s survey research included an oversample of NHPIs.

concerns; concerns about frauds and scams; and language barriers.¹⁷ The CBAMS focus group final report notes, “Participants with limited English proficiency said they would need enumerators to be fluent in their language and census forms to be in their language or bilingual. Otherwise, many reported they would have to ask a family member for assistance, and if that failed, forgo the census all together.”¹⁸ Thus, the decision not to provide any language assistance guides (LAGs) in NHPI languages was disconcerting.

The Census Bureau’s response to community organizations’ request to provide LAGs for the NHPI languages that were supported in the 2000 and 2010 censuses was to offer “templates” for communities to create their own guides. Advancing Justice | AAJC worked with the NHPI community to fund the creation of LAGs in the missing NHPI languages. The templates were difficult to use, as the formatting of the documents did not neatly line up to spacing needed for translated language (which are often not of the same length as the English text). The process placed the burden on the communities that are already among the hardest to count and the most consistently underserved—creating less than ideal products. If the Bureau wishes to continue going down this route, it should invest in creating a better process. For example, the Bureau may want to explore the creation of an app that would allow groups to input the translated language and have the app format and produce a final, translated product.

While we appreciate that the language selection process was a data-driven one in 2020, we believe that the singular focus on data did a disservice to the efforts by the Census Bureau to provide language support. The Census Bureau’s research noted that “NHPI participants did mention language barriers, especially among older members of the community” and that having assistance in language would be useful for the community. Additional data points show that 43.0% of Samoan elders, 63.6% of Tongan elders, 30.0% of Micronesian elders, and 63.9% Marshallese elders are LEP.¹⁹ This knowledge of community needs undergird recommendations from those connected to the impacted communities – community groups, Congressional offices, and the National Advisory Committee on Racial, Ethnic, and Other Populations (NAC) – who have all highlighted the need for language assistance guides in NHPI languages.²⁰ Thus, the Bureau’s sole reliance on data to define its language support program means that communities with relatively small populations are not provided with resources to ensure they are fully counted. The failure to provide language support for NHPI languages also raises issues of equity and fairness. Moving forward, the Bureau must expand its

¹⁷ CBAMS Focus Group Report.

¹⁸ *Id.*

¹⁹ Elders are defined here as those 65 years old and older. U.S. Census Bureau, Table B16004: Age By Language Spoken At Home By Ability To Speak English For The Population 5 Years And Over, 2011-2015 American Community Survey Selected Population Tables.

²⁰ See Letter to U.S. Census Bureau from Congressional Asian Pacific American Caucus (2018), <https://capac-chu.house.gov/press-release/capac-members-send-bicameral-letter-us-census-bureau-urging-adequate-language-support>; Letter to U.S. Census Bureau from U.S. Senators (2018) (on file with the author); Memo from U.S. Census Bureau to National Advisory Committee on Racial, Ethnic and Other Populations, U.S. Census Bureau Responses to Census National Advisory Committee Spring 2018 Recommendations (2018), <https://www2.census.gov/cac/nac/meetings/2018-06/2018-09-27-census-response.pdf>.

language selection process to factor community recommendations in addition to its data analysis.

Additionally, the Census Bureau should improve their language support protocols and processes to incorporate trusted CBOs in reviewing all non-English materials. This includes but is not limited to, any glossaries, non-English mailing materials, and the Census Questionnaire, while allowing sufficient time and appropriate vehicles for organizations to provide input on cultural appropriateness and translation quality prior to finalizing translations and materials.

Additionally, we believe the Census Bureau should develop educational and communications materials with simpler messages and plain-language translations. In 2010 and 2020, community members found the Census-produced materials too dense and text-heavy, and in some cases, too complicated for those who may not be literate in their own native language. The Census Bureau should strive to produce public-facing materials in plain language. Not only does this ensure that materials are accessible and easily understood by the public, it also ensures better translations into different languages.

Conclusion

We appreciate the opportunity to provide comments on the 2030 Census Preliminary Research. We look forward to working with the Bureau to plan for the ACS and the 2030 Census. Please feel free to contact Terry Ao Minnis, Senior Director of Census and Voting Programs, Asian Americans Advancing Justice | AAJC, at tminnis@advancingjustice-aaajc.org or (202) 815-4412 if you have any further questions.