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December 19, 2016

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Jennifer Jessup
Departmental Paperwork Clearance Officer
Department of Commerce
Room 6616, 14th St. and Constitution Ave. NW
Washington, DC 20230
Transmitted via email to: jjessup@doc.gov

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 for comment on October 19, 2016 at 81 Federal Register 72036. This Notice concerns the Census Bureau’s Address Canvassing Operation during the 2018 End-to-End Census Test.

NALEO Educational Fund is the nation’s leading non-profit, non-partisan organization that facilitates full Latino participation in the American political process, from citizenship to public service. Our constituency encompasses the more than 6,100 Latinos currently in office, and includes Republicans, Democrats, and Independents. NALEO Educational Fund achieves its mission through integrated strategies that include increasing the effectiveness of Latino policymakers, mobilizing the Latino community to engage in civic life, and promoting policies that advance Latino political engagement. The organization provides national leadership on key issues that affect Latino participation in our political process, including immigration and naturalization, voting rights, election reform, the Census, and the appointment of qualified Latinos to top executive and judicial positions.

NALEO Educational Fund’s expertise in Census policy and operations is based on our decades of experience encouraging Latinos to participate fully in Census enumeration. For many years, our organization has also actively advised the Census Bureau, key executive and legislative branch officials, and partner organizations on data collection practices that will enhance the quality of data obtained about the Latino community. We currently serve as organizational co-chairs of the National Hispanic Leadership Agenda’s Census Task Force and the Leadership Conference on Civil and Human Rights’ Census Task Force, and I am a member of the Census Bureau’s National Advisory Committee on Racial, Ethnic, and Other Populations.

EXECUTIVE DIRECTOR

Mr. Arturo Vargas

† deceased

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NALEO Educational Fund urges the Census Bureau to ensure that its efforts to reduce the costs of conducting the decennial Census do not compromise the quality of the data it will collect, nor exacerbate the differential undercounts of hard-to-count populations that previous decennial Censuses have produced. As it tests Address Canvassing operations in advance of the 2018 End-to-End Census Test, it is critical that the Bureau evaluate the accuracy and completeness of in-office address canvassing findings, as well as the success of its efforts to recruit linguistically- and culturally-competent staff for in-field address canvassing. Should testing reveal difficulties in recruiting qualified, multilingual in-field canvassers, the Bureau must develop new plans that will ensure successful, timely recruitment of skilled staff. If the Bureau discovers gaps in the information gleaned through in-office canvassing procedures, we strongly urge the agency to employ alternate methods that will ensure compilation of the most accurate Master Address File possible.

We attach to the present letter comments previously submitted by the Leadership Conference on Civil and Human Rights regarding Address Canvassing for the decennial Census. We share the concerns and adopt the recommendations highlighted in the Leadership Conference's comments.

Thank you for extending the opportunity to comment upon preparations for the 2020 Census. We appreciate your attention to our concerns about how changes to address canvassing methods may affect the inclusion or exclusion of addresses in the Master Address File that are home to members of hard-to-count populations. If we may provide additional information, please contact Laura Maristany, Director of Policy and Legislative Affairs, at 202-546-2536 or lmaristany@naleo.org.

Sincerely,



Arturo Vargas
Executive Director

cc: Congressional Hispanic Conference
Congressional Hispanic Caucus

**The Leadership Conference
on Civil and Human Rights**

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May 23, 2016

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

Submitted via e-mail

Re: Proposed Information Collection; Comment Request; Address Canvassing Test
(Document Citation: 81 FR 15505)

Dear Ms. Jessup:

On behalf of The Leadership Conference on Civil and Human Rights, a coalition charged by its diverse membership of more than 200 national organizations to promote and protect the civil and human rights of all persons in the United States, and its Census Task Force, we appreciate this opportunity to provide comments in response to the Department of Commerce's Request for Public Comment on the Census Bureau's plans for the 2016 Address Canvassing Test. The Leadership Conference Census Task Force is committed to ensuring a fair and accurate census and believes that a comprehensive, accurate address list and spatial database are the foundations of a complete count of the U.S. population.

The collection of useful, objective data about our nation's people, housing, economy, and communities is among the most significant civil rights issues facing the country today. The U.S. Constitution's Equal Protection Clause guarantee of fair representation requires census data that are as precise as possible in terms of where people live. There are limited opportunities in the census process to find living quarters — and, therefore, the residents — that are not a part of the Master Address File (MAF). Equally challenging—but also important—is the placement of every living quarter (whether a housing unit or group facility) in the correct geographic location.

The Address Canvassing (AdCan) operation represents an opportunity to target more enumeration resources to areas where the housing stock is less stable, undergoing significant change, more likely to include housing units with nontraditional or confusing addressing (including some multi-unit housing), or more likely to contain “hidden” living quarters that administrative records and commercial databases do not capture. The Leadership Conference supports the Census Bureau's efforts to spend limited fiscal resources wisely to implement the 2020 Census, in order to ensure that sufficient resources are available to conduct a fair and accurate enumeration in historically undercounted communities. However, **it is imperative that cost-saving measures do not shortchange the work that will be necessary to identify the hardest-to-find (and often temporary) living quarters, which — by and large — are home to people most at risk of being missed in the census.** In trying to strike the right balance between cost-effective operations and accurate outcomes,

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Karen McGill Lawson



the Census Bureau must always choose quality over savings. To that end, we offer the following recommendations.

“Hidden” Housing Units

There are “hidden” housing units in virtually all local jurisdictions, although to a greater extent in some communities than others. The Census Bureau should be able to demonstrate, through empirical research, that its redesigned AdCan operation for the 2020 Census will capture these living quarters — often created by subdividing a residential structure in violation of local housing codes or through the use of non-residential structures, such as garages, as living quarters — in areas where canvassing is conducted using both in-office and in-field procedures. Subdivided units and non-residential structures often have nonexistent or unclear unique addresses that may not conform to address information on the MAF and are unlikely to appear in commercial databases. Aerial imagery also will not determine if non-residential structures are being used as a “home.” **The 2016 Address Canvassing Test must evaluate the ability of in-office procedures to capture the existence of hidden units in geographic areas that are otherwise considered “stable.”**

Similar concerns apply to structures that have been converted from commercial to residential use, as well as structures which the Census Bureau has designated as non-residential but which, in fact, have multiple uses (e.g., a small business owner who lives in an apartment above her storefront). The Interactive Review that informs additional steps in the in-office AdCan process will not shed light on any of these hard-to-identify housing situations. Therefore, **the 2016 test must include a robust evaluation of how thoroughly additional data sources — such as local GIS systems, parcel data, state and local administrative records, and commercial data — capture these types of addresses and housing units.**

Group Quarters

Group quarters will also be validated during the AdCan test. The Census Bureau should pay particular attention to housing shelters, as some evidence suggests that housing and utility costs for poor renters have risen significantly in urban areas since 2000, potentially resulting in greater establishment and utilization of homeless shelters. It may be especially important to test the accuracy of procedures for identifying shelters for people without a permanent residence, as Transitory Locations such as motels and campgrounds are often used by this same population, but are excluded from the 2016 test. Evidence also suggests that single mothers with young children are especially at high risk of eviction. The Census Bureau itself has noted that the disproportionate undercount of young children is a demonstrated problem that is “real and growing.” **The Bureau should take such factors into consideration when identifying living quarters during the AdCan test.**

Local Update of Census Addresses (LUCA)

Input from state and municipal governments through the Local Update of Census Addresses (LUCA) program could be an important factor in the Census Bureau’s ability to identify hidden living quarters that are not included on the MAF. Yet, as previous censuses have shown, LUCA participation is far from universal, and the quality of local address information is uneven. **The 2016 Address Canvassing Test must demonstrate that the standards for determining where the Census Bureau will use in-office vs. in-field AdCan procedures do not rely unduly on local government data provided through the LUCA program where useful information might not exist.**

Currency of Data

With respect to in-office AdCan procedures, **the 2016 test must evaluate carefully the currency of all external data sources**, including aerial imagery and commercial databases. Research and anecdotal



evidence suggest that some of the information contained in these sources is outdated or does not capture change in a timely way.

Confidentiality

In finalizing the design for the 2020 Census AdCan operation, **the Census Bureau also must consider and document necessary protocols for maintaining and preserving the confidentiality of data** the Census Bureau will use to construct the MAF and TIGER database using in-office procedures. Assurances that the new procedures will meet strict Title 13, U.S.C., standards of confidentiality could be an important factor in gaining the cooperation of local governments in the AdCan operation and related LUCA program.

Staffing for Address Canvassing Operation

The Leadership Conference notes that the Census Bureau will hire “inexperienced” address listers for the in-field component of the AdCan operation. The field staff will use the new Listing and Mapping Application (LIMA) software on government furnished mobile devices. **We urge the Census Bureau to evaluate and document the ease with which temporary address listers master the program and the extent to which the new online training and data collection/verification system affected the Bureau’s ability to hire a diverse, local workforce for areas designated for in-field AdCan, including bilingual listers who can help mitigate any language barriers.**

Thank you for this opportunity to comment on the Address Canvassing Test as the Bureau strives to count everyone in the right place, to reflect enormous demographic shifts, and meet the urgent needs of communities. If you have any questions about these comments, please contact Corrine Yu, Managing Policy Director, at 202-466-5670 or yu@civilrights.org.

Sincerely,

Wade Henderson
President & CEO

Nancy Zirkin
Executive Vice President