

Responses to Comments Received on the 2020 Census 60-day Federal Register Notice

The 2020 Census 60-Day Federal Register Notice was posted for public comment and published in the *Federal Register* June 8, 2018. This document provides a response to comments received other than comments about the inclusion of the citizenship question on the 2020 Census questionnaire.

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Address Canvassing

State of California, Department of Finance - Irena Asmundson, Chief Economist

California is committed to ensuring full public participation in the 2020 Census given that a complete and accurate count is critical for fair political representation and the distribution of billions of dollars in federal funds. To that end, we strongly recommend the U.S. Census Bureau withdraw the citizenship question, increase field canvassing efforts, expand language options for the Census form and broaden efforts to reach residents who do not initially respond.

In order for the Census Bureau to achieve its goal of counting everyone “once, only once, and in the right place,” it needs a complete address list for all residents. In 2010, Census Bureau field staff canvassed nearly every block in the nation. This comprehensive approach for validating the address list has been abandoned for the 2020 Census and replaced with a new, in-office validation strategy using satellite imagery and third-party data. This type of off-site canvassing has the grave potential to miss unconventional and secondary housing units that share a roofline, such as garages and basement conversions, and do not appear on satellite imagery. People residing in these housing units may not be counted, which is unacceptable. While the Census has agreed to do in-field canvassing in areas where addresses cannot be verified (approximately 30 percent of total addresses), this is inadequate to ensure that every person has an opportunity to participate.

Asian Americans Advancing Justice - John C. Yang, President and Executive Director

As stated in the federal register notice, “[t]he goal of the 2020 Census is to count everyone once, only once, and in the right place.” To achieve that goal, the Census Bureau must prioritize the quality of the data it collects above all else, including cost savings. By definition, counting those that are harder to count will cost more. And today’s anti-immigrant, hostile political climate means there will be more that are hard to count, and they will be harder to count than ever. Thus, the 2020 Census effort must be focused on counting those hardest to count. These comments will address how best to ensure a fair and accurate census that counts everyone by providing concerns and recommendations on the content and form design as well as design changes in four key areas: reengineered address canvassing, optimizing self-response, utilizing administrative records and third-party data, and reengineered field operations. In particular, the comments will focus on (i) whether the proposed collection of information is necessary for the proper performance of the function of the agency, including whether the information shall have practical utility; (ii) ways to enhance the quality, utility, and clarity of the information to be collected; and (iii) 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.

The Census Bureau’s reliance on technology in their reengineered address canvassing operations could negatively impact a fair and accurate count of Asian Americans through the use of technology to replace on-the-ground, in-person address canvassing for 70% of the addresses in its database. In-office address canvassing, which relies on tools such as administrative records and satellite imagery, is less able to detect nontraditional, complex households than people in the field. The reality is that the traditional concept of a household – one that only includes a married couple with children under 18 – has been giving way to nontraditional, more complex households over the last several decades. While

three-fourths of all U.S. households in 1960 consisted of married couples with or without children, in 2000, just under 53 percent of all households consisted of married couples with or without children. The increase in nontraditional, complex households stems from “demographic trends such as: increases in immigration rates and the proportion of the population that is foreign born[...], and changing migration streams now coming predominantly from Asia and Latin America, rather than from Europe. Other factors include increases in cohabitation and blended families due to more divorces and remarriages; increases in the proportions of cohabitor households with children; and dramatic increases in grandparent-maintained households and nonrelative households.” In fact, multigenerational households – those that include two or more adult generations, or those that include grandparents and grandchildren – have been increasing, with a record 60.6 million people (or 19% of the U.S. population) living with multiple generations under one roof in 2014. Asian Americans are more likely to live in non-traditional, complex households. Sixty-seven percent of Asian Americans are immigrants, and those that are foreign-born are more likely to live with multiple generations of family. In 2014, 28% of Asian Americans lived in multigenerational family households, among the highest of any group. Additionally, we’ve seen in recent years that young adults are the age group most likely to live in multigenerational households. In fact, for the first time in more than 130 years, young adults 18 to 34 were more likely to be living with parents than any other living arrangements in 2014. Over 4.6 million Asian Americans are 18 to 34 years old, representing just over one in four Asian Americans. Asian Americans are often more likely to live in crowded conditions. For example, in New York City in 2009, Asian Americans had larger households than average (3.12 people v. 2.67) and were more likely to live in a household with more than one occupant (14% v. 8%). Asian Americans can also find themselves living in crowded housing with many unrelated individuals in an effort find affordable housing. All these households are complex and can be more difficult to properly count in a decennial census.

If a household is not in the master address list, then they will mostly likely NOT be counted during the 2020 census. Because In-Field Address Canvassing will be particularly important for identifying and noting nontraditional, complex households, we recommend that the accuracy of the list should be the top priority and that the Bureau should increase its In-Field Address Canvassing workload regardless of the cost factor. As part of this analysis, the Census Bureau must determine the accuracy of those 70% of the nation’s addresses that are deemed “stable” and resolved by In-Office Canvassing. Because of the invisible nature of complex households, such as multiple families living in one dwelling, we have concerns that these types of households would be missed during In-Office Canvassing. And to the extent that these types of households often represent those traditionally hardest-to-count, it is imperative that the In-Office Canvassing does not exacerbate the likelihood of missing them.

Leadership Conference on Civil and Human Rights - Vanita Gupta, President and CEO, et al

- The Census Bureau should devote more resources to conducting In-Field Address Canvassing and expand the scope of on-the-ground canvassing to increase the likelihood of capturing nontraditional, hidden, and converted housing units in the MAF before the census starts.
- We previously offered general support for the use of administrative data to assist with verifying and updating the residential address file. At the same time, we urge caution with respect to the limits of these datasets, which are far less likely to include accurate information on nontraditional and hidden housing units that, more often than not, are home to individuals and families already

considered hard-to-count based on a range of demographic characteristics identified in previous censuses and 2020 Census pretests. Over reliance on government and commercial data to build an accurate address list undoubtedly will result in failure to count a disproportionate number of households in historically undercounted communities.

New York City Department of City Planning Population Division - Joseph Salvo, Director

The Notice states that in preparation for the 2020 Census, “the Census Bureau is using In-Office Address Canvassing for the first time,” which “detects and identifies change using high-quality imagery, administrative data, and third-party sources to review and update the address list.” However, the process of identifying discrepant addresses in the absence of field inspections is potentially flawed in places like New York City, where DCP’s Local Update of Census Addresses (LUCA) research has shown that housing units, particularly basement and subdivided units in small multi-unit buildings, are undetectable using high-quality imagery, even in conjunction with administrative data. In these cases, field work needs to be conducted to verify the presence of additional units, including those provided by local governments through LUCA. The flagging of housing units during the In-Office Address Canvassing process for scrutiny in the actual enumeration should not be viewed as a substitute for in-field canvassing prior to the census.

California Rural Legal Assistance, Inc. - Ilene J. Jacobs Director of Litigation, Advocacy & Training

Development and implementation of an accurate Master Address File through thorough and improved address canvassing operations, targeting unconventional and hidden or low-visibility housing, using in person enumeration for group quarters and housing units, reaching post office box communities, utilizing hiring waivers, hiring multi-lingual and culturally, racially and ethnically appropriate decennial staff to conduct address canvassing, education and outreach, enumeration, non-response follow-up and other census operations are key to the accuracy of census data.

Reliance on In-Office and operations such as In-Office rather than In-Field address canvassing, use of administrative data and online technology for enumeration will place at risk the accuracy of data and worsen the differential undercount of the most vulnerable populations. Mailouts cannot be received without an address and online questionnaires are not designed to reach undercounted groups. GPS does not identify hidden or low visibility housing units. Households are entirely omitted from census data because of missed addresses. Traditional address canvassing, without improvements, and extensive use of electronic means will only contribute to this result.

Additional comments: The Census Bureau received three additional comments from the general population that are covered in the topics above.

Census Bureau response

The Census Bureau has implemented a number of mechanisms to ensure the quality of its Address Canvassing operations. The In-Office Address Canvassing process began in September of 2015 with the Interactive Review, which reviews all housing units across the nation using multiple sources of data such as aerial imagery, administrative data, and third-party data. The administrative and third-party data sets are used in conjunction with the imagery to give the Interactive Review clerk information about what is under each roof top. Interactive Review utilizes imagery in conjunction with data in the

Master Address File (MAF) to determine whether individual census blocks are “passive” or “active.” Blocks are determined to be passive when the number of housing units visible in the current imagery matches the number of addresses in the MAF, and to be active when the comparison of imagery to the MAF detects undercoverage or overcoverage in the MAF. Census blocks for which the Interactive Review clerk could not make a determination, generally due to cloud cover in imagery, are placed “on-hold.”

The Census Bureau began In-Office Address Canvassing in September 2015 and completed the Interactive Review initial review of all 11.1 million census blocks in June 2017. The Census Bureau’s triggering process, which began in June 2017 after completion of the initial review, identifies census blocks with changes in the inventory of addresses due to processing of the United States Postal Service Delivery Sequence File (DSF) or other address sources, census blocks that may have potential classification changes, and census blocks that were put on hold with the hope of assigning either an active or passive status. The process then sends those census blocks back into the Interactive Review component of In-Office Address Canvassing for a new review, which can result in the following:

- A passive block remains passive (i.e., the MAF has kept up with change on the ground).
- An active block becomes passive (i.e., updates to the MAF have resolved the coverage issue detected in the previous IOAC review).
- A passive block becomes active (i.e., updates to the MAF did not account for all of the change detected in imagery).
- Clearer imagery allows for determination of passive or active status for an on-hold block.

Census blocks may also be triggered directly into In-Field Address Canvassing when there are known address issues within the block.

Another component of the In-Office Address Canvassing is Ungeocoded Resolution. This project identifies the census block to which an address should be assigned when the automated geocoding process for assigning block numbers from the MAF/TIGER System is unable to make a determination. Since the project began in the spring of 2017 at the Census Bureau’s National Processing Center, over 770,000 addresses (73 percent of addresses reviewed to date) have been geocoded to census blocks by clerical staff who use reference data and resources for adding missing features, feature names, and/or addresses to the MAF/TIGER database. Only geocoded addresses are included in the census address frame since it is imperative to know in which block every housing unit is located.

This In-Office Address Canvassing process allows for a continuous update of MAF data so that the Census Bureau can target resources to identify hard-to-list and hidden housing units before conducting In-Field Address Canvassing. In-Field Address Canvassing can then target known gaps in the MAF, which the Census Bureau expects will minimize undercounting. The 2020 Census recruiting and hiring strategies will ensure that field listers have the knowledge and skills (including language skills) necessary to work effectively in areas targeted for In-Field Address Canvassing. Also, In-Field Address Canvassing training instructs listers to identify and inquire about hidden housing units.

Although the Address Canvassing operation is a key address list development activity leading into the 2020 Census enumeration, it does not work alone to assure a complete and accurate list. The 2020 Census address list development started soon after the Census Bureau finalized the 2010 Census count of living quarters. The 2010 Census addresses are retained in the MAF, and they are subject to continuous updates from the DSF, as well as new sources, to support the 2020 Census. In contrast to the previous decade, the 2020 Census did not wait until just prior to enumeration to supplement the

address list nationwide. For example, an initiative for the Geographic Support System (GSS) program—which is an integrated program of improved address coverage, continual spatial feature updates, and enhanced quality assessment and measurement—started work to improve the address frame in Fiscal Year 2011. The GSS and the DSF, in conjunction with the Address Canvassing operation, continue to update the frame prior to the 2020 Census.

The Census Bureau developed the Local Update of Census Addresses (LUCA) operation to meet the requirements of the Census Address List Improvement Act of 1994, Public Law 103-430. The Census Bureau uses LUCA to help develop the housing unit and group quarters (e.g., college dormitory, nursing home, correctional facility, etc.) address information that it will need to conduct the 2020 Census, similar to the LUCA operations that were conducted for Census 2000 and the 2010 Census. LUCA is a voluntary operation. Participating governments, after signing a confidentiality agreement to maintain the confidentiality of the Census Bureau address information, may review the Census Bureau's Title 13 United States Code confidential list of individual living quarters addresses and provide to the Census Bureau address additions, corrections, and deletions, as well as structure point coordinates and road updates. Participating governments also may provide spatial and attribute updates for addresses and roads. LUCA is available to tribal, state, and local governments, the District of Columbia, and Puerto Rico (or their designated representatives). LUCA includes federally recognized American Indian tribes with reservations and/or off-reservation trust lands, states, and general-purpose local governments, such as cities and townships, for which the Census Bureau reports data. The Census Bureau does encourage the LUCA participants to conduct a targeted review of areas that contain changes that have occurred and hidden or hard-to-find housing units, in the event the participants cannot conduct a full review of the address list. The LUCA updates are incorporated into the MAF in time to determine the In-Field Address Canvassing workload.

In addition to collecting address information through LUCA, the Census Bureau also conducts the New Construction Program. The purpose of the New Construction Program is to obtain city-style addresses for newly built living quarters for which construction is in progress during or after March 1, 2018, that are expected to be closed to the elements (final roof, windows, and doors) and potentially inhabitable by Census Day, April 1, 2020, in blocks where census questionnaires or mailing packages are delivered and households are expected to use a self-response mode to complete the census. The Census Bureau conducts the New Construction Program to assure the completeness and accuracy of the Census Bureau's address list. Participating governments have the opportunity to provide input to improve the Census Bureau's address list and to ensure accurate and complete enumeration of their communities.

The Census Bureau also conducts the Count Review operation, which is conducted in collaboration with the state demographer members of the Federal-State Cooperative for Population Estimates (FSCPE). This program allows an additional opportunity for stakeholders to review counts of housing units prior to the 2020 Census and to provide updates as necessary.

In addition, some areas of the country are designated for the Update Leave and Update Enumerate operations. The Update Leave operation is designed to occur in areas where the majority of housing units do not have either mail delivered to the physical location of the housing unit, or the mail delivery information for the housing unit cannot be verified. The Update Enumerate operation is designated to occur in areas where the initial visit requires enumerating while updating the address frame. The majority of this operation will occur in remote geographic areas that have unique challenges

associated with accessibility. In both of these operations, the addresses are visited in the field, and the address list is updated at the time of the census.

The Census Bureau is using all of these programs together to ensure the quality of the address frame for the 2020 Census.

Commenters also raised concerns about the ability for the Census Bureau's reengineered address canvassing process to locate and assure that hidden housing units and complex households are included on the address frame for the 2020 Census. As part of the GSS Program, the Census Bureau conducted a pilot project focused on assessing the degree to which hidden housing units were missing from the MAF, as well as field methods for identifying locations of hidden units. This study was conducted in a selection of census blocks in an urban setting (Queens, New York) and a rural setting (Southern California). In-field canvassers verified 70 percent of the nearly 9,000 housing units in the Queens study site, adding only 71 (0.8 percent) and deleting 13.4 percent. Of the 9,000 housing units in the Queens site, 87.8 percent were on the address list as a result of updates from address sources, including the DSF and New York City's Local Update of Census Addresses (LUCA) submissions for Census 2000 and the 2010 Census. Only 9.8 percent of the addresses in the study site had been acquired through previous in-field canvassing operations. It is important to note that canvassers in this study used the same job aid as was used during address canvassing for the 2010 Census to help identify potential hidden units. In other words, canvassers in the Queens study site were successful in validating addresses included on the address list but found very few additional hidden units. In-field canvassers in the rural site added a larger percentage of new units (6.7 percent) but deleted 31.5 percent of all units on their address list and verified only 28 percent of all units.

Additional research utilizing a statistically reliable sample of addresses and using 2010 Census household-level responses indicated that in-field canvassers were as likely to delete hidden housing units that had been acquired through processing of address sources as they were to add hidden units. Based on this research, it is estimated that 2010 Census operations were responsible for adding 214,370 good hidden units that would otherwise have been omitted from the enumeration frame (with 432,038 population). But it also estimated that census operations were responsible for deleting 217,558 good hidden units that otherwise would have survived to the enumeration frame (note that the population in these units is unknown since they were not enumerated). It is also worth noting that census operations added 163,241 hidden units that residents themselves did not consider to be separate units (such as basement or attic apartments, garage apartments, and other external units located on the same lot) and, as a result, returned duplicate household rosters on each of the census questionnaires delivered to the units. Based on the results from these two studies, while fieldwork can be valuable for locating hidden units, given the nature of hidden housing, it also is likely that fieldwork will result in the deletion of hidden units when canvassers cannot locate them on the ground. Thus, fieldwork to locate additional hidden units imperils hidden units that have been added to the address frame from sources provided by tribal, state, and local government partners. During the 2020 Census, the Census Bureau will work closely with local officials and community advocates, through the Integrated Partnership and Communications operation, to advertise so that households that have not received a questionnaire are aware of how to request a questionnaire, respond on-line, or by telephone through a call center. The Census Bureau advocates that this method will prove more effective for assuring the enumeration of individuals and households living in hidden units.

Detailed Asian Checkboxes

Asian Americans for Equal Rights - Yuan Le, Chairperson

We consider the current proposed race question to be lacking in clarity while also imposing a burden on the Census Bureau and Asian American and Pacific Islander (AAPI) community members. More importantly, the current race question treats AAPIs differently from White, African American, and American Indian or Alaska Native respondents, which is discriminatory, alienating and potentially provoking racial trauma. Therefore, we suggest that the Census Bureau remove the AAPI origin boxes and replace them with two generic Asian/Asian American and Pacific Islander checkboxes and respective write-in areas.

Additional comments: The Census Bureau also received 9,595 additional comments, some including lists of signatures, about the inclusion of detailed Asian checkboxes in the race question. Of these, 9,540 comments requested that the detailed checkboxes (e.g., Chinese, Vietnamese, Asian Indian, etc.) be removed as response categories and replaced with one checkbox labeled as Asian or Asian American, while 55 comments expressed support for these checkboxes.

Census Bureau response

The 2020 Census race and ethnicity question format must adhere to the U.S. Office of Management and Budget's (OMB) 1997 race and ethnicity standards for data collected by the Federal Government. The design of the 2020 Census question on race is similar to designs used in Census 2000, the 2010 Census, and currently on the American Community Survey (ACS), the Current Population Survey (CPS), and other federal surveys. Over the past decade, facilitating the reporting of detailed racial and ethnic identities for all population groups has been a major objective of the Census Bureau's research for improving race and ethnicity data. We work closely with advisors and stakeholders from many communities to explore ways to improve the reporting of detailed data. This objective is in line with the OMB race and ethnicity standards, which encourages Federal agencies to collect additional detailed data, as long as the data can be aggregated to the required OMB categories.

Public feedback over the past decade included strong interest in allowing respondents to be able to self-identify their detailed racial and ethnic background, such as German, Mexican, Jamaican, Chinese. For the past several decades, detailed checkboxes for Asian and Native Hawaiian and Pacific Islander (NHPI) populations proved to be an effective way to elicit detailed responses, and these approaches have been strongly supported by Asian and NHPI organizations. Providing detailed response options has been shown to help respondents have more options to self-identify. This enables the data to be tabulated both in disaggregated formats (Chinese, Samoan, etc.) as well as in aggregated formats (Asian, NHPI, etc.).

Race and Ethnicity

Asian Americans Advancing Justice

We are disappointed that the Census Bureau did not select 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. According to the submission made to Congress, the Census Bureau plans to utilize two separate questions on the 2020 form to ask about race and ethnicity. This is in contrast to the version tested in the 2015 National Content Test (and the one that was recommended for further testing with the plan to implement for the 2020 Census), which was the combined question with detailed checkboxes format for each group, a Middle Eastern or North African (MENA) category, and the ability for everyone to select multiple boxes, including for the Hispanic options (which was not available on previous census forms). We recommend the Census Bureau adopt the originally recommended format to the extent possible, which would enhance the quality and utility of the information collected given the diversity that exists within races, particularly within AANHPI communities.

NALEO Educational Fund – Arturo Vargas, CEO

In addition to the threat posed by the inclusion of the citizenship question, the Administration's failure to move forward with revisions recommended by the Bureau to the questions on Hispanic origin and race will diminish the quality of data collected in Census 2020. For Census data to present an accurate portrait of our Latino population and of other historically underrepresented groups, they must reflect the on-going evolution of Americans' racial and ethnic identity. As our nation's population has grown increasingly diverse, the Census Bureau and other government agencies have periodically conducted evaluations to determine whether changes to the wording and format of surveys about Hispanic origin and race would improve the accuracy of responses.

Leadership Conference on Civil and Human Rights

- Senior Census Bureau and Commerce Department officials should convey to the Director of OMB and the Administrator of the Office of Information and Regulatory Affairs their strong support for revisions to the OMB Standards published in the Federal Register on March 1, 2017 (82 FR 12242), especially with respect to revisions that would allow the Census Bureau to use the combined race and ethnicity question with a discrete MENA category recommended by bureau staff to the Census Director. Bureau and department officials should urge OMB to adopt revised Standards post haste, in order to allow the bureau to use the preferred question, with formatting and instructions that have been researched and tested thoroughly, in the 2020 Census.
- If the Census Bureau is unable to modify the proposed questionnaire to use a combined race and ethnicity question, it must use the Hispanic origin question tested in the 2018 End-to-End Census Test, which includes an instruction to “Mark one or more boxes AND print origins.” There simply is no compelling reason to drop the instructions clearly contemplated and validated by the Census Bureau’s comprehensive testing and evaluated in the dress rehearsal; allowing Hispanics to identify with multiple origins is consistent with the bureau’s goal of improving the measurement of the nation’s diverse population.

NAACP Legal Defense and Educational Fund – Sherilyn Ifill, et al

Despite [test] findings and despite the urging of various stakeholders, like LDF, the DOC announced in January of this year that it would continue using two separate questions for race and ethnicity. The agency has also denied the many requests it has received over decades, including in advance of the decennial 2020 Census, to add a “Middle Eastern or North African” (MENA) category to the Census form, despite the Census Bureau’s own research and findings that it would be “optimal” to add this category to “help MENA respondents to accurately report their MENA identities”.

National Hispanic Caucus of State Legislators – Felice Levine, Executive Director

- We call for a full count of all Americans, including precisely identifying Native Americans, African Americans, Native Hawaiian and other Pacific Islanders, Asian Americans, Americans of Middle Eastern and North African (MENA) descent, White Americans, and the members of our Latino communities.
- We call for the adoption of a combined race and ethnicity question, including the separate MENA category, to achieve an accurate count, and reject the decision not to include it by the Office of Management and Budget.

Additional comments: The Census Bureau received 23 individual comments expressing support for the MENA category; 54 individual commenters expressed support for the race and ethnicity questions as tested in the 2015 National Content Test or with minor changes; 78 individual commenters called for the removal of all race and ethnicity questions; approximately 40 other comments expressed support for or desired changes in race and ethnicity questions.

Census Bureau response

The U.S. Census Bureau and other Federal agencies that collect information on race and ethnicity must follow the most recent race and ethnicity standards for the Federal Government set by the U.S. Office of Management and Budget (OMB). In keeping with the OMB standards, which remain unchanged since 1997, the planned race and ethnicity questions for the 2020 Census will follow a two-question format for collecting data on race and ethnicity. There will not be a separate Middle Eastern or North African category. Responses to the census questions on race and ethnicity are based on self-identification, and the 2020 Census design for collecting these data has improved upon that of the 2010 Census.

As in previous decades, the Census Bureau plans to collect and tabulate multiple race responses, following the 1997 OMB standards. While the OMB standards do not permit the explicit collection or tabulation of mixed ethnicities (Hispanic AND Non-Hispanic) in the ethnicity question, OMB does encourage additional research on this subject. Therefore, the Census Bureau plans to analyze patterns of responses to the ethnicity question in the 2020 Census. We expect that this research will help us better understand the depth and breadth of mixed and multiple Hispanic reporting and inform future collections of these data.

Language Services

Leadership Conference on Civil and Human Rights

The Census Bureau should consult post haste with knowledgeable representatives of communities not represented currently in the language support program, to identify ways to offer language assistance during all census operations (e.g., self-response; Nonresponse Follow-up; Enumeration of Transitory Locations and Service-based Enumeration) to limited English proficient American Indian, Alaska Native, Native Hawaiian, and Pacific Islander households and individuals.

NALEO Educational Fund

For several decades, NALEO Educational Fund has conducted outreach and provided assistance to individuals in need of more information about naturalization, voting and elections, and Census participation. From our efforts, we are extremely knowledgeable about the importance of providing in-language assistance to Spanish-dominant residents who are not yet fully fluent in English. Based on this experience and our contemporary observations, we project high demand for bilingual English- and Spanish-language information and assistance through the Bureau's Census Questionnaire Assistance telephone program. Census data indicate that among those age 5 and above, the number of Latino U.S. residents who reported not being able to speak English fluently increased by more than 160,000 from 2015 to 2016, to a total of more than 16 million. In addition, nationwide polling conducted by Anzalone Liszt Grove Research for the Leadership Conference on Civil and Human Rights in December 2016 found that about 19% of Spanish-dominant Latinos would prefer to answer the Census by phone instead of online or on paper, far outpacing the national average of 7%. Assessing the demand for in-language assistance: For several decades, NALEO Educational Fund has conducted outreach and provided assistance to individuals in need of more information about naturalization, voting and elections, and Census participation. From our efforts, we are extremely knowledgeable about the importance of providing in-language assistance to Spanish-dominant residents who are not yet fully fluent in English. Based on this experience and our contemporary observations, we project high demand for bilingual English- and Spanish-language information and assistance through the Bureau's Census Questionnaire Assistance telephone program. Census data indicate that among those age 5 and above, the number of Latino U.S. residents who reported not being able to speak English fluently increased by more than 160,000 from 2015 to 2016, to a total of more than 16 million. In addition, nationwide polling conducted by Anzalone Liszt Grove Research for the Leadership Conference on Civil and Human Rights in December 2016 found that about 19% of Spanish-dominant Latinos would prefer to answer the Census by phone instead of online or on paper, far outpacing the national average of 7%.

While we are pleased the Federal Register notice reaffirms the responsible agencies' commitment to a robust in-language telephone assistance program, we are concerned that, in the absence of an explanation of how the Bureau will set goals for staffing and technological capacity, the Bureau may underestimate the demand for this service. Were the Bureau to finalize staffing and infrastructure plans for Questionnaire Assistance hotlines without collecting and analyzing as much data as are available about the language preferences of various groups of residents, it could find itself unable to meet demand. As a result, its services would not be accessible to the residents who need them.

In addition, in-language assistance helps build community members' trust in the government's ability to serve them effectively.

In the nation's current political and policy climate, the failure to meet the demand for in-language assistance could exacerbate residents' concerns about contacting government agencies and participating in Census 2020. Thus, we urge the Bureau to describe in future publications the information it will consider and the process it will follow in staffing and securing adequate phone capacity for the Census Questionnaire Assistance Program.

Asian Americans Advancing Justice

We urge the Census Bureau to revisit its decision to make the paper version of the Census questionnaire available only in English and Spanish. For Asian American communities and other language minority communities, this decision creates a severe chance of an undercount. This danger is particularly large with respect to low-income language minority communities that have lower levels of internet connectivity and thus less 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 Census questionnaire available in the same 12 languages in which it is available online.

At the same time, we have some concerns with the current 2020 Language Support Program. While some languages were added to the list, 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. We recommend, at a minimum, adding the languages supported in 2010 that are currently NOT on the 2020 language list: Cebuano, Chamorro, Chuukese, Marshallese, Samoan, and Tongan.

Finally, we believe that it is important to include in-language messaging in all mailings, whether for Internet First or Internet Choice treatment. Advocates, particularly those working in immigrant communities, believed that in-language messages used on the advance letter in the 2000 and 2010 Censuses that allowed people to indicate that they wanted to receive a questionnaire in another language or provided information about where they could go to get more in-language information were useful to engage the LEP community. 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 get information in-language to assist them in filling out their census form by directing them to the 2020 census website or to the Census Questionnaire Assistance numbers. Providing these avenues for language support upfront will help optimize self-response and remove potential cases from the NRFU workload.

State of California Department of Finance

The 2020 Census also proposes to severely reduce accessibility for non-English speakers by printing forms in English and Spanish only – a departure from the six languages included in 2010 – and limiting the language assistance provided for online and telephone questionnaires. This will adversely affect the Census Bureau's ability to meet its goal of counting all residents. Approximately 6 million

California residents do not speak English or Spanish at home and may need language assistance to complete the Census questionnaire.

National Asian Pacific American Bar Association

We encourage the Census Bureau to seriously address the need to accurately count those who are limited English proficient (LEP), including allocating significant resources to engage the population. Even before the addition of a citizenship question, Asian Pacific American communities have in the past been undercounted because of existing language barriers on the census. If LEP communities do not have adequate language access resources, participation in the 2020 Census will be low. Further, Executive Order 13166 mandates that federal agencies identify any need for services to those with LEP and develop and implement a system to provide those services so LEP individuals can have meaningful access to them.

California Rural Legal Assistance, Inc.

Motivation cannot be the most significant focus for the Census Bureau, albeit important, the Census Bureau must have address canvassers, enumerators and culturally appropriate outreach workers reaching hidden housing, visiting group quarters and post office box communities, following up on non-response, in addition to educating respondents about the importance of participation and providing assurance about confidentiality.

Language services (questionnaires, interpreters, multi-lingual census staff and materials in multiple languages are key to this effort).

Census Bureau response

Census data are collected at the household level, and the language determinations for the 2020 Census are based on data on households that are limited-English-speaking. Languages supported by the 2020 Census Language Services operation are those that have more than 2,000 limited-English-speaking households in the U.S. Limited-English-speaking households are defined as households where there is “no one 14 years or older who speaks English only or speaks English ‘very well.’” This is an important distinction, as language support decisions are driven by whether there is a language barrier at the household level.

The Census Bureau used a robust, data-driven process when determining the languages for the 2020 Census, that led to providing the Internet questionnaire and Census Questionnaire Assistance (CQA) in 12 non-English languages (compared to 5 in 2010), and language guides and glossaries in 59 non-English languages. With respect to paper questionnaires, we will provide paper questionnaires in English and Spanish, and will produce print language guides in 59 non-English languages that will assist respondents in filling out the paper questionnaire. In 2010, respondents requesting non-English paper questionnaires needed to call Telephone Questionnaire Assistance, request that a non-English paper questionnaire be mailed to them, and then wait for the questionnaire to arrive at their homes. In 2020, we will eliminate these steps and allow respondents to provide their information directly to the bilingual telephone agent in one of the 12 supported non-English languages.

The effort to ensure adequate phone capacity by the CQA program began with a review of multiple sources of data, including the 2010 Census, all intercensal tests, and the American Community Survey, to derive a distribution of expected call volume by language. Language services and the CQA program worked jointly to refine the expected call distribution by language. Census Bureau leadership provided insight into the overall call arrival patterns, and the CQA program worked to ensure adequate staffing profiles to support all language lines for the duration of the operation. Additionally, CQA is incorporating “call back” functionality in the event call volume is higher than forecasted, wherein respondents may receive a return call, rather than wait on hold to speak to an agent.

The Census Bureau makes every effort to hire local residents to be census takers, as they are likely to be more familiar with the area and accepted by the community. This practice is particularly important in areas with unique and specific language needs. Working closely with local officials and community leaders in linguistically isolated areas, our regional partnership program identifies specific hiring needs for each community. Our staffing plans will be made public in the 2020 Census Memorandum Series as our staffing projections are further refined and clarified to reach our final levels.

Internet

City of Los Angeles, CA – Eric Garcetti, Mayor

To enhance the utility of the Bureau's information collection methods, I strongly urge you to significantly increase the percentage from twenty percent of self-response households receiving an initial mailing with an invitation to fill out the census online and a paper questionnaire (i.e., Internet Choice method).

City of Los Angeles, CA – Alex Whitehead, Office of Chief Legislative Analyst

The Census Bureau has proposed further reliance on internet responses for Census 2020. However, recent cyber-security incidents, which have often involved government agencies, have heightened the public's distrust of providing sensitive information online. In addition, access to computers and the internet is not readily available to all citizens and is especially difficult to obtain for traditionally undercounted groups like minorities, recent immigrants, and those living in poverty. Encouraging internet response while subsequently tapering off the use of other response types will further alienate these traditionally undercounted communities.

Leadership Council on Civil and Human Rights

- The Census Bureau should take all possible measures to bridge the digital divide with the new internet response option. For instance, the bureau should test software for the decennial census to ensure it operates smoothly and safely on older operating systems and smartphones that may not handle new software and new websites well. This is especially important since people of color, younger adults, low-income adults, and those without a high school diploma are most likely to use older computers or a mobile device as a primary source of internet access. The bureau also must address the significant digital divide affecting many rural and remote communities, including American Indian reservations and Alaska Native villages, and ensure that there are adequate resources to conduct a comprehensive enumeration in areas where reliable broadband is problematic.
- Both the Census Bureau and the Department of Homeland Security (DHS) should guarantee the sanctity of personal data submitted as part of the 2020 Census. DHS should officially pledge to strip all personally identifiable information from any cybersecurity threat indicator it shares outside the department. With respect to Einstein 3A intercepted traffic, there is a significant threat that, absent a complete scrub of personally identifiable information from any cyber threat indicator, personal information could be used, and access abused, for purposes that will chill participation in the census.
- The Census Bureau should partner with schools, libraries, community centers, and other public computing centers that can set aside computers to facilitate on-line responses to the census for households without reliable broadband or internet access. Doing so during the self-response period would give more people an opportunity to be counted on systems that are updated, secure, and using software that optimizes response time. To this end, the Census Bureau must avoid any policy that limits the number of self-responses its IT system will accept from a single IP address or electronic device, as such limits would undermine efforts the bureau's 2020 Census staff themselves

— as well as state and local governments — are promoting to facilitate internet response in group settings whenever helpful.

- The Census Bureau should work with local partners, including civil rights advocates, to emphasize the confidentiality of responses and help respondents sift through perceived cybersecurity and privacy threats to determine legitimate strategies and outstanding concerns. The communications campaign, as well as trusted messengers who will be a conduit to hard-to-count communities, should explain clearly how to identify official on-line decennial census materials, forms, and portals, and how to avoid phishing attempts and fake websites, especially since the Census Bureau is using targeted digital advertising.

NALEO Educational Fund

The Census Bureau has proposed further reliance on internet responses for Census 2020. However, recent cyber-security incidents, which have often involved government agencies, have heightened the public's distrust of providing sensitive information online. In addition, access to computers and the internet is not readily available to all citizens and is especially difficult to obtain for traditionally undercounted groups like minorities, recent immigrants, and those living in poverty. Encouraging internet response while subsequently tapering off the use of other response types will further alienate these traditionally undercounted communities.

Hathaway-Sycamore Child and Family Services – Wendy Wang, VP for Public Policy and Strategy

Some communities have poor or no high-speed internet access.

Asian Americans Advancing Justice

The Census Bureau's heavy reliance on technology for the 2020 Census will potentially lead to higher levels of AANHPIs being missed due to the lack of access to a telephone or broadband internet at home. Asian Americans were 1.5 times, and NHPs almost twice, as likely to have no telephone service at home than Whites (2.6%). NHPs were more likely than Whites (16.6%) to not have broadband internet at home. While Asian Americans overall have more broadband internet access than Whites, certain subgroups have less access, such as Burmese and Cambodians. These communities with less access will need additional attention to ensure the move toward technology does not overlook them in the 2020 count. In addition to conducting proper outreach to these communities, it will be important for the Census Bureau to properly calibrate which households will receive the Internet Choice mailing treatment, which will ensure those households receive a questionnaire in the first instance. Not doing so could impede the Census Bureau's ability to optimize self-response. To that end, we recommend that additional attention be paid to who receives Internet Choice mailings and to err on the side on being over-inclusive of households in that universe.

NAACP Legal Defense and Educational Fund – Sherilyn Ifill, et al

The 2020 decennial Census—“the first electronic Census in U.S. history”—will use new technology and methods in an effort to reduce per household costs below those incurred during the 2010 Census. The Census Bureau plans “to implement a more efficient internet response option,

automate key components of training and field operations, and develop cloud infrastructure to streamline data collection.” While this type of innovation has the potential to improve efficiency, traditionally undercounted populations are most likely to be disproportionately harmed by any technological failures, and are at greater risk of having their data intercepted or compromised. Reliance on internet-based technology also raises concern about communities, particularly in rural regions, that lack consistent access to the internet.

Additional comments: The Census Bureau received about 45 comments from individuals related to the internet response option. While some were in favor of the internet questionnaire, others expressed concerns about availability of questionnaires, data security, and system defects.

Census Bureau response

Households in self-response areas will be able to respond to the Census online, by phone, and by mail. While the majority of the nation’s households will be encouraged first to respond via the internet (and will simultaneously be able to respond via telephone), a portion will receive a paper questionnaire in their first mailing. All households in self-response areas will receive a paper questionnaire in the fourth mailing if they have not yet responded online or by phone.

The Census Bureau has been actively working with its national partners the American Library Association and the Public Libraries Association to engage local libraries as partners. The goal of this type of partnership is for every library in America to promote the 2020 Census, allow the public to respond to the 2020 Census on its computers, and encourage visitors to do so.

With regard to confidentiality of responses and perceived cybersecurity and privacy threats, the Census Bureau is currently working with its communications, Team Y&R, to develop a creative platform that will include messages on privacy, confidentiality and cybersecurity. This creative platform will be used on all areas of the campaign from paid advertising to digital and social media efforts and will be utilized by the Census Bureau to work with national, regional and community partners that will be key in educating our hard to county groups.

The U.S. Census Bureau has a robust cybersecurity program in place to protect the nation’s information as we collect, process and store it in our Information Technology (IT) systems. We have incorporated industry best practices and follow Federal IT security standards for encrypting data in transmission and at rest. As a matter of data security, we do not disclose our specific encryption methods, but we would like to note that two-factor authentication is required for all who access the data. While many of our defenses are invisible to the public, know that we have strong and resilient security measures protecting every respondent’s information.

Type of Enumeration Areas - Contact Strategies

Leadership Conference on Civil and Human Rights

- We urge the bureau to make Type of Enumeration Area (TEA) designations for all communities available publicly as quickly as possible, to help its governmental and organizational partners develop their educational materials and plan their outreach activities in a timely way.
- The Census Bureau should mail a letter or postcard to post office boxes in areas designated as Update/Leave or Update/Enumerate TEAs before the start of the national self-response period, to alert residents about the method of delivery of their census materials. In addition, the bureau should make educational materials (such as fliers and posters) available at Post Offices in these TEAs, informing residents about census methods and timing applicable to them.

NALEO Educational Fund

We disagree with the Bureau's published plan to develop its Master Address File for places in its Update/Leave enumeration areas using exclusively in-office address canvassing procedures. Because that method relies on reference to dated administrative records and satellite images, its use is simply not appropriate for places like Puerto Rico, where a severe natural disaster has had an extreme effect on the island's residences and other infrastructure. We believe the Bureau could more efficiently and effectively enumerate Puerto Rico in 2020 by conducting normal self-response operations in those parts of the island that are best-connected and in which infrastructure has been restored. This would allow the Bureau to reserve resources and personnel for the enumeration of the most difficult-to-reach parts of Puerto Rico.

Census Bureau response

In early 2019, the Census Bureau plans to provide publicly a list of all geographic entities that contain Self-Response areas to support the New Construction program, which is the opportunity to inform the Census Bureau about recently-constructed housing units. This list will also include the percentage of tabulation blocks, by entity, that are within the Self-Response area. While this information can be used to determine whether an area will be enumerated in other ways than self-response, it is important to note that over 95 percent of stateside housing units are in Self-Response.

In Update Leave areas, the Census Bureau will mail a reminder letter and reminder postcard designed to encourage response to addresses in Update Leave areas that are capable of receiving mail. Mailable addresses include complete city-style and Rural Route Box types of addresses that are recognized by the U.S. Postal Service. These represent an estimated 20 to 30 percent of the total workload. The Census Bureau does not maintain a list of Post Office Box addresses associated with Update Leave and Update Enumerate living quarter locations due to the temporary nature of these types of associations. Given the mailability rate for these areas, the key strategy for contacting residents about 2020 Census methods for enumeration prior to the operation is through the Integrated Partnership and Communications Operation. In particular, this will occur through working with local partnership specialists and tailoring local advertisements to inform communities about ways to respond.

While only in-office address canvassing will occur prior to the census for Update Leave areas, canvassing will also occur on the ground at the time of enumeration. That is, in addition to leaving paper questionnaires and information on the options to respond online or by phone, field staff will be updating the address list to account for new addresses as well as structures that may have been destroyed. For the Census Bureau's planning purposes for field operations, it is more efficient to designate all of Puerto Rico as Update Leave rather than attempt to identify areas where the infrastructure has recovered before 2020. The Census Bureau is committed to a complete count in Puerto Rico, and enumeration in difficult-to-reach areas will not suffer from the application of Update Leave in recovered areas. We may also designate areas of California that have had fires that disrupted the address schemes, as well as the West Coast of Florida and other areas that have had flood and hurricane damage, as Update Leave (or Update Enumerate). In general, for any area that has a natural disaster that is disruptive to the housing stock in that area, the decision about what methodology to use will be made as we get closer to the time for the census.

Nonresponse Followup and Administrative Records

New York City Department of City Planning Population Division

The Notice states that, unlike in the 2010 Census, Nonresponse follow-up (NRFU) operations will incorporate “administrative records and third-party data usage to reduce the workload.” More specifically, “Once the households that did not respond through internet, telephone, or paper are known, administrative records will be used to identify vacant addresses and addresses that do not exist.” As with In-Office Address Canvassing, the use of administrative data to identify vacant and nonexistent housing is problematic in places like New York City, with many hard-to-enumerate or “hidden” units. In fact, research has shown (Keller, 2015) considerable error rates at a national level when using administrative records to identify vacant units – over 20% false positives <https://www.census.gov/content/dam/Census/library/working-papers/2015/dec/DSSD-WP2015-03.pdf>. Moreover, the use of administrative records in NRFU is potentially more damaging than with In-Office Address Canvassing, because NRFU occurs further along in the 2020 Census operation, and there are limited opportunities to correct erroneous conclusions.

Leadership Conference on Civil and Human Rights

- The Census Bureau should make more information available that demonstrates the quality thresholds it has established to determine if administrative records will be used to enumerate occupied unresponsive households after only one in-person visit and a follow-up postcard. Those thresholds must include race and Hispanic origin data consistent with the categories offered on the 2020 Census questionnaire. The bureau also must publicly address how it will overcome the deficiencies in administrative records with respect to transitory nonfamily household members, young children, and undocumented residents, among other hard-to-count individuals.
- Administrative records should be used as a source of information for unresponsive households only after a minimum of three unsuccessful in-person visits and in conjunction with data gleaned from proxy attempts.

NALEO Educational Fund

Our review of relevant published research indicates to us that use of administrative records may impair the accuracy of Census 2020 data by reinforcing racial, ethnic, and other disparities in the data produced. It is critical that the Bureau explain in detail how it will determine that administrative data can be used soundly and how it will complement or correct any such data incorporated into Census 2020 results. Until this occurs, we do not believe that administrative records can be used as planned without diminishing the quality of Census statistics and exacerbating differential undercounts. We are particularly concerned about any plans to use the records to determine vacancy status of housing, or in lieu of NRFU contacts.

Asian Americans Advancing Justice

While we recognize and appreciate that the Census Bureau is working to address congressional concerns about the cost of taking the census, efforts to use administrative records must ensure that the

quality of data for our community will not be disproportionately compromised. We are particularly concerned with the proposed use of administrative records for Non-Response Follow-Up (NRFU), where potential harm could occur if the proper precautions are not taken. There is a lack of standardization across administrative databases on how race and ethnicity is reported and collected that could potentially leave a large portion of our community being missed in these surveys through the use of administrative data.

California Department of Finance

Rather than conducting up to six in-person visits to households that do not initially respond, the Census Bureau proposes to attempt just one, in-person visit and then use administrative records as the household's response. This will lower direct participation and force the Census Bureau to rely instead on administrative records, which are unreliable. Data quality in administrative records can vary dramatically and show multiple people associated with a single address, or a single person associated with more than one address. The Census Bureau lacks sufficient evidence to show that the administrative records it obtains would adequately replace such a large number of incomplete responses. Administrative data cannot replace a project of this size and significance. Therefore, we advise the Census Bureau to conduct at least three in-person visit attempts before utilizing administrative records to fill out the census form.

Census Bureau response

In the 2020 Census NRFU operation, the Census Bureau will be implementing a personal visit to all cases that are identified as vacant or nonexistent housing units through the use of administrative records. If that visit results in an indication that the housing unit is occupied, that case will remain in the NRFU workload. This visit during NRFU will not only provide the opportunity for a census enumerator to conduct an interview with the household, if occupied, but the census enumerator will also leave a Notice of Visit at the address, which will provide information for the household to self-respond via the internet or telephone.

The Census Bureau will only be using administrative records for enumeration if an address does not self-respond. An address will receive several mailings in March and April, including a paper questionnaire encouraging them to self-respond. During the NRFU operation, the address will be visited by an enumerator. If the interview is not completed, the enumerator will leave a Notice of Visit that reminds the household that they can respond by the internet, phone or mailing back their paper questionnaire. While an enumerator may not visit the address again, we send an additional postcard reminder about one week after the visit letting the household know that they can still self-respond.

The Census Bureau has shared the findings of our research of administrative record enumeration with the Census Scientific Advisory and National Advisory Committees throughout the decade. The Census Bureau methodology addresses the concern that administrative record sources may not fully cover all populations. The Census Bureau is using administrative records that meet our quality criteria for enumeration at addresses. We require that multiple sources indicate that a family is at an address. The Census Bureau research has shown areas with higher concentrations of harder to count populations like Hispanic or Non-Hispanic Black populations have lower percentages of reducing NRFU contacts based on administrative records. This is allowing these areas with higher concentrations of harder to count populations to be receiving more field visits in the NRFU operation.

Nonresponse Followup Vacants and Deletes

New York City Department of City Planning Population Division

It is also essential to keep track of the percentage of housing units that are deleted or deemed vacant. In 2010, large numbers of census tracts in New York City in two Local Census offices had unreasonably high vacancy rates – in excess of 20 percent, in a tight real estate market. DCP and the Census Bureau became aware of this only when the Public Law file 94-171 was released, when it was too late to do anything about it. Getting real time information on the percentages of vacant and deleted units, and sharing this with local officials, will allow managers in Area Census Offices to investigate when the percentages of vacant and deleted units are unreasonably high.

Leadership Conference on Civil and Human Rights

The Census Bureau should develop an additional procedure to prevent overlooking people who reside in housing units that are officially designated as vacant or abandoned and to enumerate these residents. Such a procedure could involve consultation with knowledgeable community-based partner organizations, who can identify specific census blocks or neighborhoods where such living arrangements are likely to occur.

Census Bureau response

During the 2020 Census NRFU operation, the Census Bureau will have access to real-time information on the outcomes of NRFU visits, including counts of addresses deemed to be vacant or nonexistent. Staff reviewing these reports will be looking for anomalous situations, both within the field offices and at the management level.

In the 2020 Census NRFU operation, the Census Bureau will be implementing a personal visit to all cases that are identified as vacant or nonexistent through the use of administrative records. If that visit results in an indication that the housing unit is occupied, that case will remain in the NRFU workload. This visit during NRFU will not only provide the opportunity for a census enumerator to conduct an interview with the household, if occupied, but the census enumerator will also leave a Notice of Visit at the address, which will provide information for the household to self-respond via the internet or telephone.

Nonresponse Followup Automation

NALEO Educational Fund

- Assessing the demand for in-language assistance: For several decades, NALEO Educational Fund has conducted outreach and provided assistance to individuals in need of more information about naturalization, voting and elections, and Census participation. From our efforts, we are extremely knowledgeable about the importance of providing in-language assistance to Spanish-dominant residents who are not yet fully fluent in English. Based on this experience and our contemporary observations, we project high demand for bilingual English- and Spanish-language information and assistance through the Bureau's Census Questionnaire Assistance telephone program. Census data indicate that among those age 5 and above, the number of Latino U.S. residents who reported not being able to speak English fluently increased by more than 160,000 from 2015 to 2016, to a total of more than 16 million. In addition, nationwide polling conducted by Anzalone Liszt Grove Research for the Leadership Conference on Civil and Human Rights in December 2016 found that about 19% of Spanish-dominant Latinos would prefer to answer the Census by phone instead of online or on paper, far outpacing the national average of 7%. Assessing the demand for in-language assistance: For several decades, NALEO Educational Fund has conducted outreach and provided assistance to individuals in need of more information about naturalization, voting and elections, and Census participation. From our efforts, we are extremely knowledgeable about the importance of providing in-language assistance to Spanish-dominant residents who are not yet fully fluent in English. Based on this experience and our contemporary observations, we project high demand for bilingual English- and Spanish-language information and assistance through the Bureau's Census Questionnaire Assistance telephone program. Census data indicate that among those age 5 and above, the number of Latino U.S. residents who reported not being able to speak English fluently increased by more than 160,000 from 2015 to 2016, to a total of more than 16 million. In addition, nationwide polling conducted by Anzalone Liszt Grove Research for the Leadership Conference on Civil and Human Rights in December 2016 found that about 19% of Spanish-dominant Latinos would prefer to answer the Census by phone instead of online or on paper, far outpacing the national average of 7%.

While we are pleased the Federal Register notice reaffirms the responsible agencies' commitment to a robust in-language telephone assistance program, we are concerned that, in the absence of an explanation of how the Bureau will set goals for staffing and technological capacity, the Bureau may underestimate the demand for this service. Were the Bureau to finalize staffing and infrastructure plans for Questionnaire Assistance hotlines without collecting and analyzing as much data as are available about the language preferences of various groups of residents, it could find itself unable to meet demand. As a result, its services would not be accessible to the residents who need them. In addition, in-language assistance helps build community members' trust in the government's ability to serve them effectively. In the nation's current political and policy climate, the failure to meet the demand for in-language assistance could exacerbate residents' concerns about contacting government agencies and participating in Census 2020. Thus, we urge the Bureau to describe in future publications the information it will consider and the process it will follow in staffing and securing adequate phone capacity for the Census Questionnaire Assistance Program.

- We also understand that the Bureau may be able to achieve cost savings and better ensure against inadvertent loss of data by following the plan it has set forth in the present Federal Register notice to capture NRFU data exclusively in electronic format. However, we are concerned about the potential discrepancy between this plan and the findings that have emerged from the Bureau's test of in-field address canvassing procedures in geographically and residentially diverse settings. The connectivity issues that the Bureau has already encountered in carrying out limited activities in selected rural communities in West Virginia raise additional questions about whether electronic data capture will be fully functional where enumerators may lack cellular and data connections at the time of an interview.

Census Bureau response

Because some areas will inevitably have connectivity issues, the automated data collection system for the 2020 Census NRFU operation is designed to ensure that household data can be collected and stored on the devices and can be transmitted at a later time once connectivity is restored. This functionality for NRFU was successfully tested and demonstrated in the 2018 End-to-End Census Test.

The effort to ensure adequate phone capacity by the Census Questionnaire Assistance (CQA) program began with a review of multiple sources of data, including the 2010 Census, all intercensal tests, and the American Community Survey, to derive a distribution of expected call volume by language. Language services and the CQA program worked jointly to refine the expected call distribution by language. The Census Bureau leadership provided insight into the overall call arrival patterns, and the CQA program worked to ensure adequate staffing profiles to support all language lines for the duration of the operation. Additionally, CQA is incorporating “call back” functionality in the event call volume is higher than forecasted, wherein respondents may receive a return call, rather than wait on hold to speak to an agent.

Nonresponse Followup Manager Visits and use of Proxies

New York City Department of City Planning Population Division

While effective in cost savings, both manager visits and proxy use could diminish the quality of the enumeration as there is often an incentive for residents/superintendents/landlords not to be forthcoming about the presence of illegal units, especially in small multiunit structures with six or fewer units. In both the 2000 and 2010 censuses, the procedural standard used in New York City was that canvassers first verify by observation. Evidence of the existence of a housing unit included doorbells or buzzers, extra mailboxes, sealed garage doors with separate entryways and/or curtains on garage windows, multiple entryways with doorbells and locks, cottages or garages behind homes that could be used as housing units, alleyways running behind the buildings leading to additional structures, and factory lofts and old garages being used as housing units (Please see U.S. Census Bureau, Revised text for the Lister's Instructions – D-583). Only when verification by observation was not possible did the canvasser go to a proxy respondent. This procedural standard should also be used in the 2020 census.

Census Bureau response

For the 2020 Census NRFU operation, in general, cases do not become eligible for proxy respondents until the third unsuccessful personal visit attempt. However, cases identified as vacant or nonexistent by enumerator observation do become immediately eligible for proxy attempts. Cases that are identified as vacant or nonexistent by enumerator observation must be verified by a second (different) enumerator. The Manager Visit approach is not used for small multiunit structures as defined by the commenter. The current specification is for enumerators to conduct Manager Visit interviews only for structures that contain a total of at least 10 units, with at least two nonresponding units within the structure.

Nonresponse Followup Burden Estimate

California State Legislature – Toni G. Atkins, Anthony Rendon

The Legislature also requests that the agency correct and clarify the estimated total burden hours and burden hours for non-response follow up and their cost to allow the public to determine whether or not funding for the 2020 census is sufficient to satisfy constitutional requirements.

Census Bureau response

The U.S. Census Bureau is planning to conduct a randomized control test for the 2020 Census using the American Community Survey (ACS) infrastructure in the summer of 2019. This test will inform the planning for the non-response follow up for the 2020 Census and the Integrated Partnership and Communications Campaign. The test will ask the 2020 Census questions (i.e., number of people, tenure, sex, age, date of birth, Hispanic origin, race, citizenship, relationship, and coverage questions). The test will have two panels; Panel A will include the citizenship question, and Panel B will not include the citizenship question.

Sexual Orientation Gender Identity/Lesbian Gay Bisexual Transgender status

City of Minneapolis, MN - Jacob Frey, Mayor; Lisa Bender, City Council

The decennial census and its companion ACS are the lifeblood of wise decision-making for the next decade across all these sectors, and across all major levels of government operations. It is in recognition of this very critical impact that the census has that we must request that the 2020 Census provide everyone a chance to self-identify with respect to LGBT status and that the data not be compromised by the potentially chilling impact of a question related to citizenship status.

Additional comments: The Census Bureau received 63 comments from individuals requesting questions on LGBTQ status, while 33 commenters requested that this question not be asked; 15 individual commenters had related comments, such as requesting questions on same-sex marriage.

Census Bureau response

Federal agencies routinely request additional topics to be considered in the American Community Survey (ACS), and the U.S. Census Bureau considers them pursuant to a longstanding process that involves the Office of Management and Budget (OMB). The Census Bureau in 2016 received requests from the U.S. Department of Justice (DOJ), the Environmental Protection Agency (EPA), the U.S. Department of Housing and Urban Development (HUD), and the U.S. Department of Health and Human Services (HHS) to consider a new topic in the 2020 ACS that would collect Sexual Orientation and Gender Identity (SOGI) data. The Census Bureau and the U.S. Department of Commerce worked with the requesting agencies and OMB to evaluate the requests. On March 7, 2017, DOJ withdrew its SOGI data request before the Department completed its analysis of the need for the content. The EPA, HUD, and HHS did not further pursue their requests, and the Census Bureau concluded that, in the absence of a continuing agency request, there was no independent basis for the Census Bureau to alter or amend the current content.

Census Questionnaire Assistance

Asian Americans Advancing Justice

To optimize the utility of CQA, the Bureau should extensively advertise the availability and existence of CQA, starting no later than January/February 2020. In past censuses, the telephone assistance numbers were not well known, particularly by those with language needs. It is important that the Census Bureau's partnership and communications efforts promote the CQA program. The CQA numbers should be publicized through ethnic advertising, the mailings from the Census Bureau about participating in the census, and other materials to ensure that community groups are aware of the service, when it is available, and how it works. CQA numbers should also be given in advance to community organizations, who could in turn advertise the numbers as part of their outreach efforts.

Census Bureau response

The Census Bureau will make the CQA phone numbers available a number of ways. Mailing packages, specifically the initial mailing and the fourth follow-up, will include a complete list of all CQA language lines to contact for assistance. Additionally, the online internet-reporting instrument and 2020 Census internet pages will also list CQA phone numbers.

The Census Bureau evaluated the need for providing call center support against funding availability, balancing projected average wait times callers can expect to experience against total cost of the CQA operation. CQA is working with the Integrated Communications Contract, which is planning the partnership, outreach, and media campaigns, to determine optimal timing for targeted media campaigns and ethnic advertising.

Non-ID Processing

Asian Americans Advancing Justice

The “Non-ID” Process is especially important for hard-to-count populations. It is essential that the Census Bureau put individual non-ID responses in the correct address, to ensure accurate household data. Anecdotally in the Asian American community, during the 2010 Census, many on-the-ground partners pointed to the “Be Counted” form as a very useful tool in engaging and counting Asian Americans. The “Be Counted” forms, which were census forms that came in additional non-English languages, were accessible at specific “Be Counted” sites. The “Be Counted” forms did not contain address-specific bar codes, which provided another option for LEP respondents to fill out their forms in-language. The “Non-ID” response option can be a similarly useful tool for the 2020 Census in our community. To that end, it is important for the Census Bureau to sort out how to ensure proper household relationships are established for individuals who respond through the Non-ID response option separately from and in addition to their household and to ensure that the processing of Non-ID responses can address names of respondents from other countries that may differ structurally than the average American name. Additionally, in order to maximize the potential of Non-ID Processing, the Census Bureau must conduct advertising and develop promotional materials for use in the ethnic communities to raise awareness of the opportunity to use respond to the census even if one does not have a unique, identifying code. We recommend that the Census Bureau work with community groups to make sure they are aware of this opportunity for people to participate in the census without an identifying code, as well as incorporate it into its partnership and communication campaign.

Census Bureau response

Similar to the work in 2010 and prior Censuses to accommodate responses that lacked a Census ID, such as a Be Counted return in addition to an ID’ed questionnaire, the Census Bureau will conduct processing following the completion of the self-response period to account for all persons associated with that address. While name matching occurs as part of that processing, it is not the sole determiner for inclusion or exclusion of persons on the household roster. Therefore, name structure that is not consistent with the “first name - last name” convention accommodated on the response modes (internet, telephone, paper), will not be a barrier to inclusion.

The promotional efforts for the 2020 Census will detail the variety of potential response options through our integrated partnerships and communications program, including the Non-ID response option. Paid advertising, promotional materials and other communications tactics such as partnerships efforts, social media outreach and digital content will be targeted to reach racial and ethnic minorities and other hard-to-count populations and will provide information on all response options.

Residence Criteria

Child Care Aware of America – Lynette Fraga, Executive Director

[We] commend the Census Bureau for updating the language on the primary solicitation materials that most households will receive in 2020 to “...all adults, children, and babies living or staying at this address,” instead of “...everyone living or staying at this address.”

NAACP Legal Defense and Educational Fund

Communities of color, thus, are deprived of potential voters and the ability to elect their candidates of choice through felony disenfranchisement laws and policies. Compounding this is prison-based gerrymandering: the practice of counting incarcerated persons as residents of the prison facilities where they are housed when election district lines are drawn based on Census data. This practice distorts our democratic process by artificially inflating the population count—and thus, the political influence—of the districts where prisons and jails are located—often rural and overwhelmingly made up of white residents. As a result, the voting power of everyone living outside of those districts is weakened. And the communities that are the most harmed by prison-based gerrymandering are urban communities of color—a result of the racial discrimination that infects our nation’s criminal justice, housing, and other policies.

National Hispanic Caucus of State Legislators

We encourage the Census Bureau and, for redistricting and funding purposes, the states and territories, to count deployed service members, students and incarcerated persons at their place of permanent residence and not at the place they happen to be at the time of the census taking.

Additional comments: The Census Bureau received 2 additional comments from individuals requesting that prisoners be counted at their home address.

Census Bureau response

The Census Bureau’s goal is a complete and accurate census of every person living in the United States. To be fair and consistent, we follow a longstanding principle set by Congress to count people at their usual residence, which is where they live and sleep most of the time. As required by Article I, Section 2 of the U.S. Constitution, the decennial census is conducted to be able to apportion seats in the U.S. House of Representatives among the states. To that end, it is crucial to count everyone in the right place during the decennial census.

From the very first census in 1790, Congress established the principle of counting people where they usually reside in order to be fair and consistent. The census has followed that principle ever since. For most people, determining their usual residence is straightforward. For others — like members of the military, college students, and other people living in group quarters — knowing where to count them can be more complicated. Over time, we have developed guidelines for applying the principle of usual residence so that we accurately count people in more complicated residence situations in the correct

location. These guidelines were published in the Federal Register and are available on the Census Bureau's website.

The U.S. Census Bureau uses residence criteria to determine where people are counted during each decennial census. Earlier this decade, the U.S. Census Bureau used the Federal Register process to solicit feedback regarding the 2010 Census Residence Criteria (80 FR 28950, May 20, 2015) and the Proposed 2020 Census Residence Criteria (81 FR 42577, June 30, 2016). On February 8, 2018, the Census Bureau published the "Final 2020 Census Residence Criteria and Residence Situations" in the Federal Register (83 FR 5525). The second and third Federal Register documents regarding residence criteria (published on June 30, 2016, and February 8, 2018) contained summaries of the public comments received during the preceding Federal Register comment periods, as well as the Census Bureau's responses to those comments.

For the 2020 Census, we plan to use administrative data from the Department of Defense to count deployed personnel at their usual residence in the United States for apportionment purposes and for inclusion in the resident population counts. We will count military and civilian employees of the U.S. government who are stationed or assigned outside the United States, and their dependents living with them, in their home state, for apportionment purposes only, using administrative data provided by the Department of Defense and the other federal agencies that employ them.

We will continue to count college students where they live and sleep most of the time. For students who live away from their parents' home, we will count them at their on- or off-campus residence.

We will continue counting prisoners who are incarcerated on Census Day (April 1) at the correctional facility. However, we plan to provide states with tools to help them "move" inmates back to where they lived before incarceration, if they choose to do so. These tools will help states make their own decisions about where and whether to include prisoners when redrawing district boundaries. This plan gives interested states the information they need to redraw district boundaries as they prefer while still following the census's principle of counting people where they live and sleep most of the time. We will also give states the counts of their prison populations earlier than before. After the 2020 Census, we will provide prison counts along with the other data needed for redistricting by March 31, 2021 (per Public Law 94-171) (2010 Census counts were released April 20, 2011).

Group Quarters

Prison Policy Initiative – Aleks Kajstura, Legal Director

- State and Federal prisons data are best approached from an agency, rather than individual, perspective. If administrative data is to be used in correctional GQs for the 2020 Census, examining the use of agency-wide data in these 51 systems should be considered.
- Correctional facilities operate best with a written, standardized protocol. Prior to the 2020 Census, a written protocol should be developed with specific information pertinent to correctional settings. A review of the protocols used in the Correctional ACS may be instructive. While each state prison system and the Federal Bureau of Prisons would need a customized section (whether an agency approach is adopted or the individual facility approach is retained), the time invested in an agency-wide approach would produce benefits, such as reducing regional office time and providing consistent records within each system. Investing time at determining the best type of data for the upcoming censuses and developing a system-wide protocol will avoid the duplication of effort and the potential for subjective results present in the observed approach which relied on negotiations and enumerations at individual facilities in each of the nation's thousands of correctional facilities.
- Self-enumeration would result in more accurate race data; for example, the Maryland Department of Public Safety and Correctional Services (DPSCS), which runs the state's prisons, does not have Hispanic, Hawaiian and Pacific Islander or "two or more" race categories in their administrative records. We therefore discourage the Bureau from using administrative records, except as a last resort. However, we acknowledge that the Bureau is moving toward ever-increasing reliance on administrative records, and those records have been historically the primary method of counting incarcerated people. Given that landscape, we encourage the Bureau to use the 2020 Census as an opportunity to work with correctional facility administrators to get the best records possible for the 2020 Census and set the stage for improving record accuracy for the 2030 Census.

Census Bureau response

During Group Quarters Advance Contact, Group Quarter facility administrators will be given several data collection options for the 2020 Census, including eResponse, and paper data collection operations such as facility self-enumeration, drop-off/pick-up, paper listings, etc. The eResponse option allows resident-level data to be uploaded onto a secure server and sent to the Census Bureau. The Census Bureau has entered into a Memorandum of Agreement with several organizations, including correctional facilities to use eResponse for the 2020 Census. The protocol is similar to the ACS in that Introductory Letters will be mailed to facilities in advance of Advance Contact. Letters are tailored based on group quarter type (i.e. correctional, college/university student housing, etc.) The letters will also contain a link to the website for 2020 Group Quarters data collection. We realize that self-response for group quarter residents is ideal, but it is up to the administrators as to how the Census Bureau will collect data, as they are the gatekeepers. The Census Bureau provides several data collection options for facility administrators to choose from based on their privacy and security concerns.

Redistricting Data Program

State of California Legislature – Toni G. Atkins, Anthony Rendon

The Notice suggests that citizenship information may be included in the PL94-171 dataset. The Legislature urges that the PL94-171 dataset be released in the same form as in 2010, with the same number of tables, including the Total Population and the Voting Age Population tables.

Additional comments: The Census Bureau received an additional 125 comments from individuals who expressed opposition to inclusion of the citizenship data on the PL94-171 files delivered for redistricting. One commenter was in favor of including this data.

Census Bureau response

The current schedule for the final design of the 2020 Census P.L. 94-171 Redistricting Data File has a completion date of June 30, 2019. The U.S. Census Bureau will use feedback regarding the Prototype Redistricting Data File, stakeholder comments, and legal requirements, amongst other considerations in the creation of this final file design.

Undercount/Undercount of Young Children/Communications

Child Care Aware of America

[We] request that the Census Bureau revamp its communications research and outreach to include special attention to the undercount of young children.

California Rural Legal Assistance, Inc.

Predominant reliance on internet self-response, administrative records and third-party data also lead to differential undercount because the same vulnerable and undercounted populations and low-visibility and unconventional housing units are underrepresented in online use, and undercounted in administrative records and third-party data sources. They are underrepresented for both structural and response rate reasons which is borne out by the Census Bureau's decades of research and evaluation.

Coverage improvement, especially for omissions, will be key to assessing the impact of increased reliance on technology and untested questions and field operations.

The Children's Health Coverage Coalition – Mayra Alvarez (The Children's Partnership), et al

The Children's Health Coverage Coalition—consisting of The Children's Partnership, Children Now, Children's Defense Fund California, California Coverage & Health Initiatives, and United Ways of California—commends the Census Bureau for updating the language on the primary solicitation materials that most households will receive in 2020 to “...all adults, children, and babies living or staying at this address, “instead of “everyone living or staying at this address.”

Additional comments: The Census Bureau received an additional 53 comments from individuals expressing concerns about an undercount of young children.

Census Bureau response

There are many reasons why children are undercounted. Since there is no single cause for the undercount of young children, there is no single solution to the problem. We are pursuing multiple strategies to ensure that the count of young children is as complete as possible:

- We changed the wording on the census questionnaire to help those responding on behalf of their household to include children and babies. We have added the term “grandchild” and tested prompts to list unrelated children. This new wording was tested in the 2018 End-to-End Census Test.
- We are developing materials that explain why young children are undercounted and how organizations and individuals can educate households likely to exclude young children on their questionnaire.
- We are including messaging on the importance of including young children in our communications and partnership support materials.
- We plan to purchase advertising and will have an online presence aimed toward households with young children. We will also partner with advocacy groups focused on children and local community groups who can help us get the word out about the importance of counting all children in the household.
- We are working on a local level. Organizations that focus on children are connecting us with communities through pediatrician groups and advocacy organizations focused on local children. Together, we are getting the word out about counting all children.
- We are working with local schools through our Statistics in Schools program to educate parents about the importance of the census by way of older siblings of these undercounted children.
- We improved our census-taker training materials to emphasize the importance of including children during interviews with nonresponding households.

In addition, the Census Bureau is working closely with children's group and advocacy organizations to build partnerships and conduct outreach to address the count of young children. We have published an info-graphic that describes living situations in which children might be missed and suggests ways for groups and organizations to discuss these situations with the communities they serve. The communications campaign has also conducted research on the matter through the Census Barriers, Attitudes and Motivators Survey (CBAMS) and will continue doing so through the creative testing process and other communications-related research. Messages used on a number of communications tactics (i.e. promotional materials, partnerships efforts, social media outreach and the Statistics in Schools program among others) will also include messaging about counting young children.

The Census Bureau agrees about the importance of a coverage measurement program to assess the quality of the 2020 Census.

Reengineering Field Operations/Field Operations Staffing

Leadership Conference on Civil and Human Rights

- The bureau should consult with community-based organizations familiar with neighborhoods and rural areas where hard-to-find housing is prevalent, both as a source of a knowledgeable hiring pool for the address canvassing operation and for guidance on the types of living quarters address listers might overlook. Equally important, residents of many neighborhoods and areas where address canvassing will take place are likely to view address listing staff with suspicion and even fear, equating any government personnel who are walking around their communities with federal and local law enforcement authorities. Stakeholder organizations can serve as trusted messengers in communities where address canvassing is taking place, reassuring residents about the purpose and safety of the work taking place.
- The Census Bureau should ensure adequate opportunities for people to apply for census positions using traditional paper applications, and also facilitate convenient on-line applications for individuals who do not have access to the internet.
- Increase the number of Area Census Offices in a way that is commensurate with projected increases in the NRFU workload in many hard-to-count communities.
- Open and operate, through the self-response and NRFU phases, Questionnaire Assistance Centers in hard-to-count urban and rural communities (as identified through the Census Bureau's 2018 planning database) where no ACO will be located.
- The Census Bureau should seek immediate support from the Commerce Department to secure a waiver from the Office of Personnel Management that will allow the bureau, as in past censuses, to hire work-eligible noncitizens as enumerators, cultural facilitators, and partnership specialists in immigrant communities where language barriers could prevent complete census participation.

State of California Legislature

The risk of an undercount is compounded by the fact that the Census data collection process, as summarized in the Notice, will rely on several novel and untested procedures meant to reduce in-field personal follow-ups. The Bureau will be relying for the first time on internet self-reporting, and the Bureau's budget for non-responsive follow-ups (NRFU) appears to be based on an estimate that 45% of households will self-respond through the internet and 60.5% will self-respond by mail, internet, or phone. Similarly, the Bureau will be relying on "in-office" address canvassing, which relies on electronic sources such as satellite imagery rather than in-person site verification, to determine address validation. Adding the citizenship question, which will deter self-responses by noncitizens, naturalized citizens and their citizen relatives, to a Census process that already lacks sufficient on the ground resources for non-responsive followups, will greatly interfere with the Bureau's ability to ensure an accurate and full count. At a minimum, the Bureau must provide more detail about how it will deploy in-field follow-up resources in areas with large immigrant populations and other areas where self-response rates could be low.

Asian Americans Advancing Justice

The Census Bureau plans to hire about half the number of temporary workers as it hired for the 2010 Census. With this decrease in staffing, it is even more critical that the Census Bureau recruit and hire people who are "indigenous" to the communities where they will be working because of the

knowledge these workers bring – from local knowledge of language to local knowledge of neighborhood and culture. To this end, we recommend the Census Bureau prioritize community, cultural and linguistic skills, experience, and knowledge when recruiting and hiring.

The Census Bureau should ensure adequate opportunities for people to apply for census positions using traditional paper applications, and also facilitate convenient on-line applications for individuals who do not have access to the internet.

Increase the number of Area Census Offices in a way that is commensurate with projected increases in the NRFU workload in many hard-to-count communities. Open and operate, through the self-response and NRFU phases, Questionnaire Assistance Centers in hard-to-count urban and rural communities (as identified through the Census Bureau’s 2018 planning database) where no ACO will be located.

Additional comments: The Census Bureau received an additional 2 comments from the general public about reengineering field operations. The issues are covered in the above.

Census Bureau response

The 2020 Census design infuses technology into many pieces of the decennial operation, thus streamlining many of the Census Bureau’s internal processes, compared with the 2010 Census. Census-takers will use smartphones or tablets to securely receive and send their daily assignments and time sheets, instead of meeting their supervisors in person to handle those tasks on paper, as in prior censuses. These changes, which were successfully tested in the field, allow managers to supervise more employees and eliminate the need for the daily in-person meetings required in the past. With these efficiencies, we require fewer offices for the 2020 Census than we had for the 2010 Census.

We conducted a data-driven process to determine how many ACOs we need and where to locate them. Based on the projected number of households that will not respond on their own and therefore require a census-taker to visit, we projected a total number of census-takers required. From the number of census-takers, we projected the number of managers needed and determined that 248 ACOs are required for the 2020 Census.

The Census Bureau will provide a traditional paper application for those people who are otherwise unable to complete the online version of the application. Additionally, the Census Bureau will be working at the local level, with local partners and organizations, libraries, and job centers, in order to facilitate the ability to complete the application online, for individuals who do not have access to the internet.

Additional Comments

The Census Bureau received an additional 532 comments from the public on general census issues, political issues, proposals for more or fewer questions (other than those discussed above), in support of or against having a 2020 Census, on unrelated issues, or that were unclear. These comments are not addressed in this response.