



Officers

Chair

Judith L. Lichtman
National Partnership for
Women & Families

Vice Chairs

Margaret Huang
Southern Poverty Law Center
Derrick Johnson
NAACP
Thomas A. Saenz
Mexican American Legal
Defense and Educational Fund

Secretary

Fatima Goss Graves
National Women's Law Center

Treasurer

Lee A. Saunders
American Federation of State,
County and Municipal Employees

Board of Directors

AFL-CIO
American Association of People
with Disabilities (AAPD)
AAUW
American Civil Liberties Union
American Federation of Teachers
American-Arab Anti-Discrimination
Committee - ADC
Anti-Defamation League
Arab American Institute
Asian Americans Advancing
Justice | AAJC
Common Cause
Delta Sigma Theta Sorority,
Incorporated
HRC | Human Rights Campaign
International Union, UAW
Japanese American Citizens
League - JAACL
Jewish Council for Public Affairs (JCPA)
Lawyers' Committee for Civil
Rights Under Law
League of United Latin
American Citizens (LULAC)
League of Women Voters
NAACP Legal Defense &
Educational Fund, Inc (LDF)
National Congress of American
Indians (NCAI)
National Council of Jewish Women
National Education Association
National Fair Housing Alliance
National Organization for Women
National Partnership for
Women & Families
National Urban League
People for the American Way
Religious Action Center of
Reform Judaism
Service Employees International Union
Sikh Coalition
UnidosUS

President and CEO

Maya Wiley

March 11, 2025

Sheleen Dumas
Departmental PRA Clearance Officer
Office of the Under Secretary for Economic Affairs
U.S. Department of Commerce
Washington, DC 20253

Re: 2026 Census Test-Peak Data Collection (FR Doc. USBC-2024-0028)

Submitted via email to acso.pra@census.gov

Dear Ms. Dumas:

On behalf of The Leadership Conference on Civil and Human Rights, a coalition charged by its diverse membership of more than 240 national organizations to promote and protect the civil and human rights of all persons in the United States, and its Census Task Force co-chairs, Asian Americans Advancing Justice | AAJC and NALEO Educational Fund, we appreciate this opportunity to provide comments in response to the Census Bureau's request for feedback on the peak operational plans for the 2026 Census Test (the "Test"), published in the *Federal Register* on January 10, 2025 ("notice") (Docket Number USBC-2024-0028).

The Leadership Conference is the nation's oldest, largest, and most diverse civil and human rights coalition and provides a powerful unified voice for the many constituencies we represent. Our coalition views an accurate and fair census — and the collection of useful, objective data about our nation's people, housing, economy, and communities generally — to be among the most important civil rights issues of our day. The Leadership Conference's longstanding role as a Census Information Center has allowed us to lift up within our broad civil rights coalition the fundamental importance of comprehensive, high-quality data about our population, communities, and economy. We also have a long history of first-hand experience working in support of the decennial census and the ongoing ACS.

As a threshold matter, we want to underscore the importance of thorough research and testing in every decennial census cycle. Through its ongoing pursuit of and dedication to improved data collection methods, the Census Bureau is always prepared to evaluate both refined and cutting-edge updates to methods that will help ensure a cost-efficient, fair, and accurate census. But the bureau cannot achieve that goal without carefully planned, executed, and timely tests, both in the field and through nationally representative samples. Both the field and national components of the 2026 Census Test, therefore, are essential, especially with respect to improving peak data collection methods.

Furthermore, the Census Bureau cannot postpone the 2026 Field Test because there will not be time to conduct such comprehensive research and testing at a later date. Census Day

March 11, 2025
Page 2 of 6

(April 1, 2030) is set by law, and the U.S. Constitution mandates a census every ten years. The 2026 Census Test must therefore proceed on schedule and cover the entirety of areas and methods. To ensure a successful 2026 Field test and to best apply its results to planning for the 2030 Census, the bureau must also consult proactively and meaningfully with stakeholders prior to, during, and after the Test. At a minimum, the 2030 Census Advisory Committee must be reinstated so that the bureau can continue to rely on the expertise of committee members in preparing for the Test and utilizing the research it yields. We note that the 2030 Census Advisory Committee was in fact scheduled to discuss in depth, and offer recommendations on, some of the topics below.

We offer the following recommendations to maximize the effectiveness of the 2026 Census Test in preparing for the 2030 Census.

1. The focus on increasing online response must not overshadow the importance of improving other response methods.

Given the many avenues for a majority of U.S. households to access and use the internet to submit census responses, we appreciate the effort to maximize online self-response in the Test. We support the focus on ensuring data security; ease of use and access for people responding; sufficient technological capacity; and — perhaps most importantly at a time of both rapid technological advancement and continued digital inequities in many communities — that the online portal can be used easily across a wide range of technology platforms, including smartphones, to boost electronic responses and, therefore, data quality and completeness. With respect to encouraging online response in communities on the lagging side of the digital divide, the Census Bureau should consult closely with knowledgeable community advocates to ensure the bureau understands the most commonly used communication technologies, learns the best ways to address gaps in digital literacies in various communities, and creates an online portal that works optimally on these platforms and for these communities.

2. The Census Bureau should highlight the availability of a non-ID response option in the Test.

We urge the bureau to amplify the non-ID response option in the Test field sites and the national sample component. So-called “complex households” are more prevalent in historically undercounted and undercount-prone communities, particularly in low-income and immigrant urban and rural communities. Even if enumerated, these households are more likely not to include all household members in their count, making it more likely that a household is enumerated yet not fully counted (“within household” omissions). First introduced in the 2020 Census, the non-ID online and telephone response option should be highlighted and promoted more widely and clearly in all 2030 Census tests. The bureau should rely on local partners to identify neighborhoods and communities where complex households are likely to be prevalent.

To increase inclusion of all complex households in census results, the bureau should fully assess the use of non-ID response in the Test and adjust promotion of this option in the 2028 Dress Rehearsal and 2030 Census itself, as indicated by Test evaluations. Assessments should include an analysis of non-ID response by race/ethnicity, owner and renter status of household, household size, and

March 11, 2025
Page 3 of 6

language used for response (to the extent offered in the Test), in order to understand fully the types of households for which non-ID response adds to a complete enumeration. These analyses, in turn, can inform promotion of non-ID response among population and household groups most likely to take advantage of this option. Finally, the bureau should use the Test to refine and strengthen protocols for accepting non-ID responses and placing them in the correct households, while at the same time seeking to eliminate the possibility of duplication in census enumeration operations that already contribute substantially to overcounts of certain population groups,

We also want to highlight a related concern with respect to counting separate households in overcrowded housing. The definition of a “housing unit” in the notice gives us pause, as it could be read to discount the existence of separate households in one structure that, for example, has been subdivided without knowledge of local housing authorities or the U.S. Postal Service (for purposes of mail delivery).

“An HU is a private residence for a person or small group of people (such as a family or group of roommates). Each housing unit must have a separate entrance that provides direct access to the outdoors or to a common space within a building (such as a hall, lobby, or stairwell) without having to pass through the living quarters of any other people.”

This definition implies that residents of a unique household who are living in a portion of a structure that does not have direct access to the outdoors, such as an attic or basement, cannot be enumerated as a separate household. Families living in such situations, in particular, are significantly more likely to be missed if they are not allowed to complete a separate census form. Fear of government authorities in immigrant communities, as well as growing financial strain in low-income communities, increase the likelihood of these situations. We urge the Census Bureau to discuss this challenge with knowledgeable experts and relevant stakeholder organizations in municipalities where such households exist to ensure that its definitions reflect reality across all communities.

3. Self-response for selected Group Quarters (GQ) is a promising and positive development for data collection; its success will largely hinge on clear instructions to potential respondents and GQ administrators alike.

We strongly support the pursuit of a self-response option for residents of select noninstitutional GQs in the census. However, we are concerned that limiting notification of this option to the use of email might not work well for all institutions selected for this new response option. In addition, the bureau must ensure that while the new methodology helps to maximize census participation, it also eliminates the possibility of duplication in census enumeration operations that already contribute substantially to overcounts of certain population groups, most notably college students living away from home during the census. For example, email notifications should clarify that respondents should associate themselves with only one address, as people may receive email notifications across several different email platforms.

March 11, 2025
Page 4 of 6

Previous Census Bureau focus group research,¹ as well as the bureau's recent experience with GQ self-response in the American Community Survey, led the bureau to select college housing, workers' quarters and Job Corps centers, and religious quarters for testing an online self-response via an individual census questionnaire (ICQ) for the 2030 Census. While we agree it is likely that college students use email as a means of communication, we are more skeptical of using email to reach residents of worker living quarters, especially in migrant worker communities, as well as some members of religious quarters. Migrant workers might not use email due to technology preferences or lack of digital access in rural areas; literacy barriers could also play a role.

Accordingly, we urge the Census Bureau to consult with advocates for migrant workers about the alternative ways to notify these workers of the opportunity to self-respond to the census, via the online portal and an ICQ, as set forth in the Notice, to help ensure the most effective means of communicating this option, as well as its efficacy among a population at high risk of being undercounted. Further, we question the decision to limit testing of a self-response option to the select GQ populations to online response, without also exploring the option of telephone self-response for these GQ types. We encourage the bureau to expand its testing to include telephone self-response for select GQ populations.

Finally, we urge the bureau to ensure that communications to college students regarding the self-response ICQ option are available in multiple languages, to ensure that foreign students studying in the U.S. can take advantage of a response vehicle that produces the most accurate data.

4. Quality assurance operations are essential for strengthening public trust in the census process, as long as the results are transparent.

We also appreciate the inclusion of quality assurance (QA) activities throughout the peak data collection period at the six field site tests. QA is vital to ensure that in-field data collection in all types of communities is consistent and of high quality, particularly in communities with low self-response rates. The Census Bureau should analyze the factors that lead to lower-quality field enumerations, share its findings with the public, and take transparent steps to address weaknesses identified through the Test, so that door-to-door data collection and data quality improve measurably during the 2028 Dress Rehearsal.

5. The national sample must be sufficiently large and available in multiple languages to ensure a response universe that fully reflects the geographic, economic, racial and ethnic, size, and linguistic diversity of U.S. households.

We applaud the inclusion of a nationally representative sample in the Test, to evaluate refinements to timing and messaging for census packages. The Census Bureau should release additional information regarding the design and size of the national sample and plans for multilingual communications and messages as soon as possible, so that stakeholders can adequately judge the breadth and depth of the Test plan. Relatedly, offering information and a response option through Census Questionnaire

¹ <https://www.census.gov/library/working-papers/2024/adrm/rsm2024-07.html>

March 11, 2025
Page 5 of 6

Assistance in multiple languages, and accessible response avenues for individuals with disabilities, should also be a priority for the six field sites.

6. Other Test elements outlined in the notice.

The specific issues highlighted above are not meant to be inclusive of all comments and concerns related to the notice, but rather to emphasize certain issues of particular concern to the broad civil rights community represented by The Leadership Conference. Below, we note several other elements of proposed peak data collection operations for the 2026 Census Test that caught our attention with respect to the bureau's ability to evaluate Test operations that are fundamental to ensuring a fair and accurate census. These additional observations are as important as those set forth above.

- a. We support the option of making paper questionnaires available in the Mobile Questionnaire Assistance (MQA) operation. While we acknowledge that the bureau is still deciding where to locate MQAs in the six field sites, we strongly urge the bureau to consult with partner organizations in low self-response areas of each site regarding these decisions, in addition to using the metrics outlined in the notice.
- b. We support the consultation with knowledgeable stakeholders in developing address and contact frames for GQs and Transitory Locations. The Leadership Conference itself is well-positioned to advise the Census Bureau on stakeholder organizations who can assist with this effort.
- c. We believe that "cross-training" for some temporary Test employees will help the bureau contain costs by taking advantage of the full range of skills each employee brings to the table. At the same time, this promising enhancement for training must not replace the need to hire a sufficient number of culturally and linguistically competent and knowledgeable field staff during In-Field Enumeration operations. We understand that the bureau must use the Test to estimate both cost and staffing needs for the 2030 Census. In all cases, appropriate staffing levels to improve coverage of historically undercounted communities must outweigh cost considerations, although effective cross-training could help mitigate costs.
- d. Testing CQA design should focus on ways to make collection of census responses a priority, by emphasizing that possibility for everyone who calls the telephone line and then making it easy to provide responses via phone (or to request a paper questionnaire, if preferred). Too often during the 2020 Census, callers were frustrated by the emphasis on messages to respond online; the bureau may well have "lost" responses from callers who were discouraged by their inability to provide responses by phone immediately and were unable to try another response option (for any number of reasons). The bureau should view the primary purpose of CQA as an opportunity to capture responses quickly, especially from households or individuals who face barriers to online response.
- e. Finally, we support the goals for In-Field Enumeration for housing units set forth in the notice. The Census Bureau should make public its evaluation of these benchmarks from the

March 11, 2025
Page 6 of 6

Test, so that stakeholders fully understand subsequent decisions regarding 2030 Census operations and how those choices will help improve coverage across all historically undercounted and at-risk of being undercounted communications.

Thank you for your consideration of our views on these important issues related to peak data collection activities in the 2026 Census Test. We appreciate the opportunity to comment on this critical census test and note that transparency of results will contribute greatly to public confidence in the bureau's design and operational decisions for 2030. If you have any questions about these comments, please contact Meeta Anand, senior director of the census and data equity program at The Leadership Conference on Civil and Human Rights, at anand@civilrights.org.

Sincerely,

The Leadership Conference on Civil and Human Rights
Asian Americans Advancing Justice | AAJC
NALEO Educational Fund