



Chair
Fatima Goss Graves
National Women's Law Center

Vice Chairs
Derrick Johnson
NAACP
Thomas A. Saenz
Mexican American Legal Defense and
Educational Fund

Secretary
Vacant

Treasurer
Lee A. Saunders
AFSCME

Directors
Liz Shuler
AFL-CIO
Maria Town
American Association of People with
Disabilities
Gloria L. Blackwell
American Association of University Women
Anthony Romero
American Civil Liberties Union
Randi Weingarten
American Federation of Teachers

Abed Ayoub
American-Arab Anti-Discrimination Committee

Jonathan Greenblatt
Anti-Defamation League

Maya Berry
Arab American Institute
John C. Yang
Asian Americans Advancing Justice | AAJC
Virginia Kase Solomón
Common Cause

Cheryl Turner
Delta Sigma Theta Sorority, Incorporated

Kelley Robinson
Human Rights Campaign

Shawn Fain
International Union, UAW

Cheyenne Cheng
Japanese American Citizens League

Amy Spitalnick
Jewish Council for Public Affairs

Damon Hewitt
Lawyers' Committee for Civil Rights Under Law

Juan Proaño, CEO
League of United Latin American Citizens

Celina Stewart
League of Women Voters of the United States

Janaí Nelson
NAACP Legal Defense & Educational Fund, Inc.

Larry Wright, Jr.
National Congress of American Indians

Jody Rabhan
National Council of Jewish Women

Rebecca Pringle
National Education Association

Lisa Rice
National Fair Housing Alliance

Kim Villanueva
National Organization for Women

Jocelyn Frye
National Partnership for Women & Families

Marc Morial
National Urban League

Svante Myrick
People for the American Way

Rabbi Jonah Pesner
Religious Action Center of Reform Judaism

April Verrett
Service Employees International Union

Harman Singh
Sikh Coalition

Bryan Fair
Southern Poverty Law Center

Janet Murguía
UnidosUS

President and CEO
Maya Wiley

March 5, 2026

Sheleen Dumas
Departmental PRA Clearance Officer
Office of the Under Secretary for Economic Affairs
U.S. Department of Commerce
Washington, DC 20230

Submitted via email to adcc.2030.census.paperwork@census.gov and via regulations.gov

Re: 2026 Operational Test in Support of the 2030 Census (FR Doc. USBC-2026-0034)

Dear Ms. Dumas:

On behalf of The Leadership Conference on Civil and Human Rights; our Census Task Force co-chairs, Asian Americans Advancing Justice – AAJC and NALEO Educational Fund; and the undersigned organizations, we appreciate this opportunity to provide comments on the 2026 Operational Test in Support of the 2030 Census described in the *Federal Register* Notice Docket Number USBC-2026-0034, “Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; 2026 Operational Test in Support of the 2030 Census” (“Notice”).

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.

Accurate census data are a cornerstone of our democracy. As a threshold matter, we want to underscore the importance of thorough research and testing in every decennial census cycle. We support the Census Bureau’s ongoing commitment to improving its data collection methods through operational updates to ensure an accurate and cost-efficient census. The bureau cannot achieve that goal without thorough, scientifically rigorous testing of its outreach and operational methods, both in the field and through nationally representative samples.

We are therefore very concerned by the proposed scope for the 2026 Operational Test in Support of the 2030 Census, which differs dramatically from the plans for the 2026 test that

March 5, 2026
Page 2 of 8

the bureau released in January 2025.¹ The “operational test” described in the current Notice would represent an operational field test for the 2030 Census in name only. Due to the extremely small population sample and significant methodological issues, the results of such a test would be of very limited utility for improving the effectiveness and cost-efficiency of decennial census operations. We are particularly concerned about the following limitations and methodological issues for the 2026 test as proposed:

1. **Using any questionnaire other than the decennial census form to test census operations is not scientifically valid and will not produce useful information to improve 2030 Census operations and outreach.** The American Community Survey (ACS) Methods Panel is designed to test outreach and operational methods for the ACS, *not* the decennial census. The ACS questionnaire is decidedly longer than the decennial questionnaire and asks different questions, making it inappropriate for testing decennial census operations. Using the ACS form would significantly limit the usefulness of the data this test would produce for informing and improving decennial census methodology.
2. **The proposed test’s sample is not representative of the nation’s population. This would severely curtail the value of its results for strengthening census operations, particularly for correctly enumerating groups at risk for an undercount.** In its final report on the fiscal year 2026 Commerce, Science, and Justice appropriations bill, Congress underscored the importance of carrying out the 2026 Census Test in “geographically and demographically diverse field sites nationwide, and with a nationally representative sample of households,” and called on the Census Bureau to “ensure the objectives of the 2026 Census Test are fully realized.”^{2,3} We are especially concerned by the following reductions in the proposed test’s scope compared to the pre-publication version of the *Federal Register* Notice for the 2026 test that was released and subsequently withdrawn in September 2025:
 - **Elimination of test sites in Western Texas; Tribal lands within Arizona; Colorado Springs, Colorado; and Western North Carolina:** Scaling back the field test sites to only Spartanburg, South Carolina and Huntsville, Alabama does not provide an adequate population sample for the 2026 test. Eliminating the other four test sites excludes many groups at risk for an undercount, including residents of rural areas, Tribal lands, military bases and other Group Quarters facilities. This also includes housing units that are more challenging to enumerate, such as seasonal housing and new construction. The remaining sites also do not include significant immigrant, Asian American, Latino, or American Indian and Alaska Native populations. The original test sites were specifically selected to ensure appropriate representation of all these groups in the 2026 test, as their inclusion is

¹ U.S. Census Bureau. (2025, January 10). *Agency information collection activities; Submission to the Office of Management and Budget (OMB) for review and approval; Comment request; 2026 Census Test—Peak Data Collection* (90 FR 1952). *Federal Register*. <https://www.federalregister.gov/documents/2025/01/10/2025-00270/agency-information-collection-activities-submission-to-the-office-of-management-and-budget-omb-for>

² U.S. Senate Committee on Appropriations. (2025). *Departments of Commerce and Justice, Science, and Related Agencies Appropriations Bill, 2026* (Senate Report No. 119-44). U.S. Government Publishing Office. https://www.appropriations.senate.gov/imo/media/doc/fy26_cjs_senate_report.pdf

³ United States House Committee on Appropriations. (2026). *Division A – Commerce, Justice, Science, and Related Agencies Appropriations Act, 2026* (PDF). U.S. Government Publishing Office. <https://docs.house.gov/billsthisweek/20260105/Division%20A%20Commerce%20Justice%20Science.pdf>

crucial to the test's accuracy. It is not too late to restore these test sites: recruitment for temporary Census Bureau 2026 Test workers was underway in several of the test sites until recently, and these communities are ready to move forward with hosting the 2026 test if these sites are restored.

- **Elimination of the national sample component:** The current proposal does not include any national self-response testing component, which is critical to informing 2030 Census messaging, mailing strategies, and materials. Failure to include a national component further harms the representativeness of the 2026 test's sample and will weaken the Census Bureau's ability to develop effective strategies to improve self-response rates.
- **Elimination of Group Quarters component:** This proposal does not include any testing of Group Quarters enumeration, even though Spartanburg and Huntsville were originally selected as test sites due in part to the variety of group quarters facilities they include. Previously proposed testing of a self-response option for Group Quarters residents, which would have examined whether a self-response option would decrease follow up costs and increase data accuracy, also does not appear in this Notice.

3. Testing the use of United States Postal Service (USPS) workers for in-field enumeration (IFE) presents major operational, legal, and cost-efficiency challenges. The current proposal's testing of in-field enumeration is limited to small-scale tests, which include a pilot of employing postal workers to carry out IFE. Previous research in a 2011 Government Accountability Office report⁴ and 2019 Census Bureau report⁵ has already shown that this approach would increase census costs and disrupt mail service. The additional small-scale testing of USPS employees proposed in this Notice would be redundant and a waste of federal funds allocated to planning for and testing 2030 Census operations. Moreover, previous considerations of employing USPS workers as census enumerators surfaced an irreconcilable difference in legal governance structure between Title 13, which governs Census Bureau employees, and Title 39, which governs USPS employees. Title 39 allows Postal Service employees to share information with law enforcement and others under certain circumstances⁶, while Title 13 explicitly forbids sharing of individuals' census data for *any* purpose⁷. Until the Department of Commerce addresses and publicly communicates a solution to this critical discrepancy, there should be no testing of postal workers to carry out census operations.

4. Providing an internet self-response (ISR) option for the test in English only will further undermine the utility of the test for improving self-response rates. Multilingual ISR options in the 2026 test are critical to increasing self-response rates, improving data accuracy, and reducing in-field enumeration costs. The 2016 Census Test provided ISR in English, Spanish, Chinese (Simplified), and Korean⁸, and ISR for the 2020 Census was available in English,

⁴ Government Accountability Office. (2011). *Decennial Census: Census Bureau and Postal Service should pursue opportunities ...* (GAO-11-874). <https://www.gao.gov/assets/gao-11-874.pdf>

⁵ U.S. Census Bureau. (2019). *2020 research and testing: Proposed postal carriers as Census Bureau enumerators pilot* (Final Analysis Report). <https://www2.census.gov/programs-surveys/decennial/2020/program-management/final-analysis-reports/2020-report-postal-carriers-census-enumerators-pilot.pdf>

⁶ 39 C.F.R. § 266.3

⁷ 13 U.S.C. §§ 9, 214

⁸ Chapin, M. (2016, November 3). *2016 Census Test preliminary findings* [Presentation to the National Advisory Committee]. U.S. Census Bureau. <https://www2.census.gov/cac/nac/meetings/2016-11/2016-chapin.pdf>

March 5, 2026
Page 4 of 8

Spanish, Chinese (Simplified), Vietnamese, Korean, Russian, Arabic, Tagalog, Polish, French, Haitian Creole, Portuguese, and Japanese⁹. Eliminating multilingual ISR options in the 2026 test will undermine the Census Bureau's ability to improve self-response rates among households with limited English proficiency, which are already more likely to be undercounted. Lower self-response rates will also increase the cost of follow-up and in-field enumeration operations.

- 5. The proposed test does not include any community partnership engagement and eliminates testing of several methods to improve self-response in undercounted communities, including Mobile Questionnaire Assistance (MQA) centers and phone-based Census Questionnaire Assistance (CQA).** Community partnerships have been a core component of decennial census operations for decades, helping the Census Bureau to more effectively reach undercounted communities. Strengthening these partnerships is an essential element of pre-decennial field testing, and their removal from the 2026 test will undermine the Bureau's ability to work effectively with local partners in the 2030 Census. Removing testing of community partnership strategies from the 2026 test is particularly egregious in light of the Commerce's Department's abrupt termination of the Census Bureau's advisory committees in February 2025.^{10,11,12} The advisory committees served as a critical forum for gathering input from stakeholders with expertise in reaching undercounted communities. Failure to test approaches to engaging community partners in the 2026 test will further increase the risk of undercounts in the 2030 Census. The MQA and CQA programs are also critical to supporting self-response in undercounted groups, with MQAs being particularly important for communities with limited internet access or digital literacy.

Equally concerning, these significant cuts and introduction of methods that undermine the scientific validity of the 2026 test were made without the input of stakeholders with expertise in planning for the decennial census, particularly those on the 2030 Census Advisory Committee. If the Bureau proceeds with these plans, it will fail to obtain reliable information on how to better reach undercounted communities.

We cannot afford to set the 2030 Census up for failure by allowing a 2026 test with such significant scientific and methodological infirmities to move forward. Proceeding with the test as described in this Notice would constitute a gross misuse of the funds Congress has appropriated to the Census Bureau to improve the efficacy, accuracy, and cost-efficiency of census operations and outreach. Moreover, it would be a missed opportunity to effectively prepare for a fair, accurate, and comprehensive 2030 Census,

⁹ U.S. Census Bureau. (2020, March 9). *The 2020 Census speaks more languages* (Press release No. CB20-CN.25). <https://www.census.gov/newsroom/press-releases/2020/languages.html>

¹⁰ The Leadership Conference on Civil and Human Rights. (2025, May 7). *Civil rights groups oppose the termination of the Census advisory committees*. <https://civilrights.org/resource/civil-rights-groups-oppose-the-termination-of-the-census-advisory-committees/>

¹¹ NALEO Educational Fund. (2025, March 4). *NALEO Educational Fund expresses disappointment over elimination of Census Bureau's advisory committees* [Press release]. https://naleo.org/wp-content/uploads/2025/03/3_4_25_-_NEF_Census_Committee_Statement_-_FINAL.pdf

¹² Asian Americans Advancing Justice – AAJC. (2025, March 4). *Civil Rights Coalition denounces the termination of Census Advisory Committees and the inevitable harm to 2030 Census planning*. [Press release] <https://www.advancingjustice-aajc.org/press-release/civil-rights-coalition-denounces-termination-census-advisory-committees-and>

March 5, 2026
Page 5 of 8

jeopardizing the quality of census data, and all the downstream effects thereof, for at least the next decade.

We therefore call on the Department of Commerce to correct course and ensure an effective field test for the 2030 Census by:

1. Using only the decennial census form for the 2026 test to ensure its scientific validity for informing 2030 Census methods.
2. Restoring the national sample, Group Quarters component, and the other four previously planned test sites to the 2026 test to ensure the representativeness of the test's sample.
3. Including robust testing of in-field enumeration operations by trained and qualified Census Bureau employees and eliminating the proposed testing of employing USPS employees for enumeration.
4. Providing an internet self-response (ISR) option for the test in (at minimum) English, Spanish, Chinese (Simplified)¹³, and any other locally common languages in the test sites, and restoring testing of phone-based Census Questionnaire Assistance (CQA) and paper questionnaires.
5. Restoring testing of community partnership engagement, Mobile Questionnaire Assistance (MQA) centers, and other methods to improve census response rates in undercounted communities.
6. Ensuring transparency around the outcomes of the test by publishing an analysis of the test results and consulting stakeholders about how this information can help to improve 2030 operational methods.

A decennial census that counts every person residing in the United States is critical to providing accurate, useful, and actionable information about all of our nation's communities. To ensure the reliability of 2030 Census data, the Census Bureau must conduct a 2026 field test that will yield useful information to ensure an accurate count of all communities, particularly those at risk of being undercounted.

Thank you for your consideration of our views on these important issues related to the integrity of the 2026 Operational Test in Support of the 2030 Census. We appreciate this opportunity to provide comments and look forward to continued engagement to ensure a successful 2030 Census. 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
The Leadership Conference Education Fund

¹³ Languages proposed for ISR testing in the Census Bureau's January, 2025, *Federal Register* Notice on the 2026 Census Test: *Agency information collection activities; Submission to the Office of Management and Budget (OMB) for review and approval; Comment request; 2026 Census Test—Peak Data Collection* (90 FR 1952).

March 5, 2026
Page 6 of 8

Asian Americans Advancing Justice – AAJC
NALEO Educational Fund

AAPI New Jersey
Alaska Public Interest Research Group (AKPIRG)
American Association for Public Opinion Research
American Statistical Association
APA VOICE 2030 Complete Count Committee
Arab American Institute (AAI)
Arkansas Impact Philanthropy
Arkansas United
Asian American Federation
Asian American Legal Defense & Education Fund (AALDEF)
Asian American Resource Workshop (AARW)
Asian Americans Advancing Justice | Chicago
Asian Americans Advancing Justice | Southern California (AJSOCAL)
Asian and Pacific Islander American Vote (APIAVote)
Asian Community Development Corporation
Asian Counseling and Referral Service
Asian Law Alliance
Asian Law Caucus
Asian Pacific Islanders Civic Action Network
Asian Texans for Justice
Association for Public Policy Analysis and Management (APPAM)
Association of Chinese Americans
Association of Population Centers
Association of Public Data Users
AZ AANHPI Advocates
Barred Business
Black Researchers Collective
Black Voters Matter Fund
California - U.S. Census Bureau Federal-State Cooperative for Population Estimates and for Population Projections
California Pan-Ethnic Health Network
Catalyst California
Center for Economic and Policy Research
Center for Urban Research, CUNY Graduate Center
Central American Resource Center
Chaldean Community Foundation
Children's Action Alliance
Chinese American Service League
Chinese Progressive Association
Civic Nebraska
Coalition for a Healthier Frederick County
Coalition on Human Needs
Common Cause
Common Cause Georgia

March 5, 2026
Page 7 of 8

COOLJC Region 8 SJEREC
Council of Professional Associations on Federal Statistics
Data Quality Campaign
Data Rescue Project
dataindex.us
Disability Rights Education and Defense Fund (DREDF)
Empowering Pacific Islander Communities (EPIC)
Equality California
Fair Count
Family Centered Treatment Foundation
Funders' Committee for Civic Participation (FCCP)
Future of Us
Georgia AAPI Hub
Georgia Conservation Voters Education Fund
Georgia Redistricting Alliance (GRA)
Georgia Stand-UP
Homecrest Community Services
Housing Action Illinois
ICPSR, The Data Consortium
Impact Fund
Iowa Asian Alliance
IPUMS
Japanese American Citizens League
Labor Council for Latin American Advancement (LCLAA)
Latino Community Foundation
League of United Latin American Citizens (LULAC)
MACS 2030 - Minnesotans for the ACS and 2030 Census
Maine Children's Alliance
Maryland Center on Economic Policy
MinKwon Center for Community Action
Missouri Asian American Youth Foundation
Movement Advancement Project
MS Communities United for Prosperity (MCUP)
National Council of Asian Pacific Americans
National Education Association
National Network for Arab American Communities
NC Counts Coalition
New York Civic Engagement Table
New York Elections, Census & Redistricting Institute
New York Immigration Coalition
New York League of Conservation Voters
OCA-Asian Pacific American Advocates
OCA-Greater Houston
Orange County Asian and Pacific Islander Community Alliance (OCAPICA)
Pennsylvania Partnerships for Children
PFLAG National
Philanthropy California

March 5, 2026
Page 8 of 8

Population Association of America
Population Reference Bureau
Prison Policy Initiative
Project On Government Oversight
RLS Demographics, Inc.
SAAVETX EDUCATION FUND
Silver State Equality
Simply Put
Southeast Asia Resource Action Center (SEARAC)
State Voices
Stop AAPI Hate
The Colorado Health Foundation
The Hispanic and Immigrant Center of Alabama
The League of Women Voters of the United States
The National Coalition for Asian Pacific American Community Development (National CAPACD)
The New York Community Trust
United Way of Rhode Island
Vitalyst Health Foundation
Welcoming America
Women Watch Afrika, Inc.