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

Re: 2030 Census Locate Address Test for Accessory Dwelling Units (OMB Control Number 0607 1031)

Dear Ms. Dumas:

On behalf of The Leadership Conference on Civil and Human Rights and our Census Task Force co-chairs, Asian Americans Advancing Justice – AAJC and NALEO Educational Fund, we appreciate this opportunity to provide comments on the efforts by the Census Bureau to include Accessory Dwelling Units (ADUs) in the 2030 Census, as described in the Federal Register Notice (OMB Control Number 0607-1031), “Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; 2030 Census Locate Address Test for Accessory Dwelling Units.”

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, and a complete address list is foundational for a successful 2030 Census. We applaud the Census Bureau’s efforts to better identify the existence of Accessory Dwelling Units (ADUs), include them on the census address list, and ensure residents of ADUs are counted in the census. During this decade, problems related to the availability and cost of housing have increased pressure on the existing housing stock, resulting in accessory buildings being increasingly repurposed for residential use. As this Federal Register Notice (FRN) notes, these units are not always included in U.S. Postal Service address files, which the bureau uses to update its address list.

We appreciate the bureau’s plans to deploy an array of methods to better detect ADUs, including obtaining ADU addresses through local government partnerships and working to better locate ADUs during in-field enumeration. We support the proposal in this FRN for Census Bureau employees to visit address locations with potential ADUs to help refine strategies for identifying ADUs and enumerating residents. In addition, we offer the following comments on the Locate Address Test for Accessory Dwelling Units:

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- We appreciate that in this field activity to contact residents and confirm the existence of ADUs, the Census Bureau has emphasized a Confidentiality Notice and upholding Title 13 protections. This provides a unique opportunity to test messages about the confidentiality of address information and help curb fears of disclosing such information to governmental authorities. Title 13 confidentiality is of the utmost importance for the 2030 Census, as for the integrity of all censuses.
- In this effort “to locate and classify” ADUs, we encourage the Census Bureau to ensure employees have appropriate guidance on how to list ADUs, given that these units are likely not to be separately identified for mail delivery purposes and not have exact address identifiers. The bureau should consider adopting standard nomenclature and training field workers on ways to best label these units.
- The narrow geographic footprint of the test — limited to areas within a 25-mile radius of Census Bureau facilities in Suitland, Maryland and Jeffersonville, Indiana — may limit the generalizability of findings. We encourage the bureau to consider how lessons learned will be applied to jurisdictions with different ADU regulatory environments and building stock.
- While the identification and enumeration of ADUs as part of the 2030 Census in-field enumeration operation can occur during the census, we encourage the Census Bureau to focus on how best to ensure ADUs are on the address list before enumeration begins — particularly through effective communication with tribal and local government partners during the Local Update of Census Addresses operation. We appreciate the bureau’s efforts toward this so far and encourage continued focus on this goal.
- The Census Bureau should place a high priority on creating trust that data on ADUs provided by governmental units will be protected under Title 13 of the U.S. Code.
- We appreciate that this field activity conducts in-person visits to potential ADUs “identified by local governments and online address resources.” The bureau should make a special effort to identify the shortcomings of in-office processes that have been used to identify ADUs, especially the use of aerial imagery. Conducting an in-office review of the same properties being examined in the field could help the bureau evaluate the limits of what can be done in-office to determine whether an accessory building is actually a dwelling unit. We appreciate the bureau’s focus on ultimately ensuring ADUs are included in the 2030 Census and residents are enumerated.

Thank you for your consideration of our views on these important issues related to the 2030 Census Locate Address Test for Accessory Dwelling Units. 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

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