The Leadership Conference Education Fund

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November 4, 2026

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

Re: Qualitative Research to Improve 2030 Census Communications (FR Doc. 2026–20316)

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 in response to the proposed information collection published by the Census Bureau, Department of Commerce: Federal Register Notice Docket Number USBC-2026-0397, "Qualitative Research to Improve 2030 Census Communications."

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 time. 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 firsthand experience working in support of the decennial census and the ongoing American Community Survey.

In the comment request for "Qualitative Research to Improve 2030 Census Communications," the Federal Register Notice (FRN) includes several components that we support. We appreciate the Census Bureau's recognition of the need to collect insight from the public well in advance of the decennial. We support the bureau's efforts to gather this insight leading up to the 2030 decennial through the 2023 Census Barriers, Attitudes, and Motivators Study (CBAMS), the 2025 Household Trends and Outlook Pulse Survey (HTOPS), and this proposed research project. We also support a research-informed communications campaign to design effective communications and advertising messages for the 2030 Census, as mentioned briefly in this notice. Lastly, we appreciate this project's focus on hard-to-count (HTC) audiences, with plans to target "populations and geographies that are particularly challenging to enumerate."

However, the proposal also raises some significant questions around the Census Bureau's plans for CBAMS and additional questions on the proposed research.

CBAMS I and II

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Both qualitative and quantitative public opinion research are critical to understanding how to educate and motivate audiences toward an accurate census count. Without up-to-date, representative insights into the population's perceptions of and attitudes toward responding to the census, the Census Bureau would not be able to develop impactful outreach to maximize self-response. This notice makes this very point, stating that "tracking and monitoring attitudes toward the decennial census in the intercensal years helps establish a baseline understanding of public opinion as a starting point for messaging, and how public opinion may change as the 2030 Census gets closer." The "successful [CBAMS] conducted to inform the 2010 and 2020 Censuses" were significant undertakings that served as the basis for messaging, creative, advertising, partnership, and strategy development for the large-scale communications campaigns in both decennials.

The 2020 Census Integrated Partnership and Communication (IPC) was deemed a success by the Census Bureau,[1] particularly when considering the challenges of the global COVID-19 pandemic. Census Bureau officials credited the IPC with a self-response rate of 67% — greater than the 2010 self-response rate of 66.5% — and with helping account for 99.98% of U.S. households. The IPC included a partnership operation and the Integrated Communication Campaign as a "research-based approach" that "raised and kept awareness high throughout the 2020 Census to encourage response." In 2018, former Deputy Director Ron Jarmin wrote,[2] "The 2020 CBAMS proves a much stronger and more robust foundation for our communications strategy than available in prior decennial censuses…The extensive research effort yielded rich insights that will inform the subsequent stages of the [decennial] communications campaign" — a campaign whose goal was "to reach as many people as possible, in the languages familiar to them, to motivate them to participate in the census.[3]"

The Census Bureau is no doubt aware that the 2020 CBAMS[4] (CBAMS II), executed in 2018, was a comprehensive, mixed-methods operation that included 42 in-person focus groups,[5] conducted in English, Spanish, Vietnamese, Mandarin Chinese, and Cantonese Chinese, and a survey in English and Spanish that garnered 17,500 responses. The subsequent $675 million campaign included the research; messaging, creative, and materials development in English and other languages; $350 million of paid advertising in 47 languages through multiple channels;[6] earned media and public relations in multiple languages; partnership outreach in collaboration with the bureau's partnership team; and Statistics in Schools support.

For the 2010 CBAMS project (CBAMS I), the bureau in 2008 interviewed more than 4,000 respondents[7] in English, Spanish, Korean, and Chinese. The learnings gained from the research informed the development of "a social marketing campaign capable of motivating every segment of the U.S. population." While not as robust as the 2020 CBAMS, the 2010 research was one that the Census Bureau was able to build upon for the

[1] U.S. Census Bureau. 2020 Census Response Rate Update: 99.98% Complete Nationwide. Press Release. Oct. 19, 2020.
[2] U.S. Census Bureau. Research Sets the Stage for 2020 Census Communications. Director's Blog. Nov. 1, 2018.
[3] Team Y&R. 2020 Census Integrated Communications Plan Final Report. Feb. 14, 2025.
[4] U.S. Census Bureau. 2020 Census Barriers, Attitudes, and Motivators Study Survey Report: A New Design for the 21st Century. Jan. 24, 2019.
[5] U.S. Census Bureau. 2020 Census Barriers, Attitudes, and Motivators Study (CBAMS) Focus Group Final Report: A New Design for the 21st Century. Jan. 24, 2019.
[6] U.S. Census Bureau. Census Bureau Releases Final Report on 2020 Census Integrated Communications Campaign. Press Release. Oct. 25, 2021.
[7] U.S. Census Bureau. C2PO 2010 Census Integrated Communications Research Memoranda Series. May 12, 2009.

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next decennial and, we assumed, would be "replicate[d] and expand[ed]" in 2030—borrowing from the language used in this FRN.

Given the scope, scale, rigor, and mixed-methods approach of CBAMS I and II, we sincerely hope that the bureau's proposal of 50 interviews is not intended to be a substitute for the qualitative component of the 2030 CBAMS. Such limited interviews would not suffice as the sole qualitative research effort to inform 2030 Census communications–particularly in light of the anticipated complexity around the decennial introduced by the bureau's current notice of proposed rulemaking on "Decennial Census of the Population of Americans; Proposed Residence Criteria and Proposed Regulations for Demographic Questions." The bureau must clarify for stakeholders and the public whether it intends for this research to serve as the previously planned odd-year CBAMS. It must also specify whether there is a relationship between this study and HTOPS, as the 2024 CBAMS was redeployed, rolling some of its questions into HTOPS.

Both CBAMS I and II took place in the intercensal "8" years, with planning starting at least one year before, and the execution of both heavily involved the Census Bureau's communications contractor. We are therefore extremely concerned that the Census Bureau has not engaged a communications team for the 2030 Census, let alone released any sort of request for proposal (RFP) for this work—in contrast to the last decennial, when the bureau both released the final RFP and awarded a contract in 2016. The lack of updates pertaining to a 2030 Census communications campaign raises serious concerns regarding plans for a concerted effort to outreach to all households in the country, as well as planned comprehensive research required to inform such an effort.

Proposed Qualitative Research

The proposal is to conduct 50 hourlong one-on-one interviews, virtually and in person around Washington, D.C., and Puerto Rico. We are concerned with the following aspects of this proposal:

- *Research Goals:* The FRN has identified learning about "why some households do not complete the census" and "themes that can inform compelling census communications" as two of the key outcomes of this research. Amid a widespread decline in trust in federal government,[8] a decline in the bureau's credibility with the public, and ongoing concerns about the government and data protection, confidentiality must be included as a priority topic of the interviews. This includes delving into public fears around providing personal information to the government, motivating messages and messengers to address or overcome those fears, and the effectiveness of messaging around Title 13 and Title 26 protection, among others.

- *Languages:* The notice does not address languages in which the interviews will be conducted. Given the focus on Puerto Rico, the Census Bureau must, at minimum, conduct some of the interviews in Spanish. And because the bureau considers "racial and ethnic minorities" and "people who speak languages other than English" as two of its HTC populations,[9] we urge the Census Bureau to include additional non-English languages beyond Spanish such as Asian languages and Haitian Creole. One consideration may be to conduct research in the 12 non-English languages that were supported in the 2020 Census.[10] Additionally, the inclusion of sign language would be highly appropriate given that

[8] Gallup, Inc. Trust in Federal Government Sinks to New Depths. Oct. 13, 2026.

[9] U.S. Census Bureau. Counting Every Voice: Understanding Hard-to-Count and Historically Undercounted Populations. Census Blog. Nov. 7, 2023.

[10] U.S. Census Bureau. The 2020 Census Speaks More Languages. Press Release. March 9, 2020.

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sign language was not included in the CBAMS projects and that people with disabilities are an HTC group. Furthermore, the stated focus area of Washington, D.C., includes a significant number of Deaf and hard-of-hearing students and faculty at Gallaudet University.

- *Hard-to-Count/Historically Undercounted Populations:* Beyond HTC due to language, we urge this qualitative research to include other HTC groups and historically undercounted populations (HUPs). For example, limiting interview methodology to in-person or virtual interviews will create challenges to reaching the hard-to-locate, hard-to-contact, and hard-to-interview segments. The Census Bureau should include phone interviews as an interview method to reach respondents who do not have broadband access. We also urge the Census Bureau to ensure that parents and guardians of children ages 0-4 are included as interview subjects since children of this age group are persistently undercounted.

- *Geography:* We presume that the selection of Washington, D.C., and Puerto Rico as the locations for in-person interviews is due to convenience and an intent to focus research on Puerto Rico,[11] respectively. However, conducting interviews in these two locations does not capture regional issues, the rural and tribal perspectives, and other HTC/HUP audiences. We urge the Census Bureau to, at the very least, conduct in-person interviews in each of the four census regions.

- *Scale:* The bureau has proposed to interview 50 individuals. We do not believe such a small sample will garner meaningful or representative insights to inform or improve communications at any level. This quantity of interviews may provide the bureau with anecdotes but cannot be sufficient to complement any quantitative research. To ensure that its communications research is effective, the bureau must increase the scale of this project so as to capture a representative sample of HTC and HUP segments and consider additional qualitative research methods such as focus groups.

- *Recruitment:* The notice states that 250 potential respondents will be screened to select 50 participants to interview but does not specify how the bureau will recruit respondents. With Local Update of Census Addresses not yet underway, the bureau's Master Address File (MAF) has not been updated. This means that the Bureau will need to look for other sources to reach and recruit participants from the hardest-to-count geographies that this research is designed to prioritize. For example, leveraging only the MAF for Puerto Rico means that more than half of the households there will not be considered.[12] We encourage the bureau to engage in other means to recruit interviewees, such as local census workers, trusted voices, and community organizations, and to ensure that outreach uses accessible communications, such as large print, audio formats, plain language, and sign language or captions.

- *Collaboration:* Understanding that the interviews will be conducted by the Center for Behavioral Science Methods, we urge the bureau to engage stakeholders in the development of interview prompts and screening of individuals. It would be critical for the bureau to collaborate with trusted voices and community organizations to ensure that respondents and responses are authentic and representative. We also urge that the interviewers mirror the communities that they are interviewing; for example,

[11] U.S. Census Bureau. Census Bureau Announces New and Expanded Projects in Response to Public Submissions to the 2030 Federal Register Notice. Press Release. Oct. 17, 2023.
[12] Puerto Rico Cuenta. A system that can't locate you can't count you. Webpage.

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Puerto Ricans conduct the interviews of Puerto Rican residents, and native in-language interviewers conducting their respective interviews.

- *Timeline:* In addition to the timing issue stated above in the context of a communications campaign – that is, lack of information around an RFP for the campaign, we urge the Census Bureau to share its timeline for this research — specifically, when the findings will be shared, how they will be shared, and whether they will be shared with the general public so as to be useful to other groups planning to engage in census outreach work.

- *Context:* The notice makes reference to "other qualitative methods" and "quantitative research" plans. It is unclear what additional research the bureau is planning to do leading up to the decennial, and it is difficult for us to fully evaluate the efficacy of this research without broader context and comprehension of these other plans.

In conclusion, while we support the Census Bureau conducting research in advance of the 2030 Census, we believe that this proposal exposes gaps in the bureau's research and communications planning and is insufficient to provide the bureau with meaningful insights to inform 2030 Census communication efforts.

We appreciate the consideration of our views by the Census Bureau and Department of Commerce and look forward to your responses to our questions. 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,

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Asian Americans Advancing Justice – AAJC
NALEO Educational Fund

Asian & Pacific Islander American Health Forum
Asian and Pacific Islander American Vote (APIAVote)
Association of Public Data Users
Autistic Self Advocacy Network
Census Quality Reinforcement task force
Coalition on Human Needs
Common Cause
Disability Rights Education and Defense Fund (DREDF)
Empowering Pacific Islander Communities (EPIC)
Equality California
Fair Count Inc
Insights Association
League of Women Voters of the United States
MACS 2030 - Minnesotans for the American Community Survey and 2030 Census
Movement Advancement Project
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National Action Network

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