



**UNITED STATES DEPARTMENT OF COMMERCE**  
Economics and Statistics Administration  
**U.S. Census Bureau**  
Office of the Director  
Washington, DC 20233-0001

**OCT 16 2017**

**MEMORANDUM FOR:** Ditas Katague  
Chair  
National Advisory Committee on Racial, Ethnic,  
and Other Populations

**From:** Ron Jarmin   
Performing the Non-Exclusive Functions  
and Duties of the Director  
U.S. Census Bureau

**Subject:** U.S. Census Bureau Responses to National Advisory Committee  
on Racial, Ethnic and Other Populations 2017 Spring Meeting  
Recommendations

The U.S. Census Bureau thanks the National Advisory Committee on Racial, Ethnic and Other Populations for its recommendations. We are responding to the committee recommendations submitted during the April 27-28, 2017, meeting.

Your expert advice is critical to identifying new strategies for improved census operations, survey and data collection methods, including determining cost-efficient ways to increase census participation.

Attachment

**Topic - 2020 Census and 2018 End-to-End Test:**

- 1) **Recommendation:** As the period for testing and making adjustments to the 2020 Census operational plan comes to a close, the Bureau will make additional changes to the plan based on available appropriations and research findings. The NAC recommends that the Census Bureau be transparent in a timely fashion about its criteria for such decisions, including the canceling or pausing of certain aspects of the plan, and explain the impact of the decisions on its ability to achieve a fair and accurate census.

**CENSUS BUREAU RESPONSE:**

The Census Bureau will continue to be transparent in discussing changes to the 2020 Census design via our meetings, through working groups, and through virtual meetings if needed. The 2020 Census Operational Plan v3.0 will be released to the public in October 2017. The Census Bureau anticipates releasing additional revised versions in October 2018 and October 2019.

- 2) **Recommendation:** The NAC recommends that when feasible, the Census Bureau will consult with and solicit feedback from the NAC about the impact of significant adjustments to the 2020 Census Operational Plan on achieving a fair and accurate census count before those adjustments are finalized.

**CENSUS BUREAU RESPONSE:**

The Census Bureau appreciates the advice, feedback, and recommendations from the Committee. The Census Bureau will continue to engage with the NAC during their fall and spring meetings and throughout the 2020 Census life cycle.

***Recommendations on 2018 End-to-End Census Test***

- 3) **Recommendation:** The NAC strongly urges the Census to develop a plan to reinstate the cancelled 2017 Field Test on Tribal Lands and in Puerto Rico through the 2018 End-to-End Test.

**CENSUS BUREAU RESPONSE:**

The Census Bureau appreciates the recommendation, but given our current budget situation, our plan will not include these sites in the 2018 End-to-End Census Test.

- 4) **Recommendation:** The Census should clearly outline different contingencies around these field tests with possible “drop dead dates” and implications for an accurate Census count for missing those drop dead dates. Census should clarify what the different costs (both financial costs and possible negative impact to communities) are for the different contingencies (including not doing the test).

*(This test was going to identify possible solutions to the difficulty reaching American Indian and Alaska Native (AIAN) respondents without mailing addresses and barriers to in-person enumeration. The AIAN population experienced the largest undercount, 4.9 percent, of any major race/ethnic population group in the 2010 Census, so it is critical to include the tribal lands field test. Note that civil rights groups already are making this request for FY 2018 appropriations in their work with Congressional appropriations staff.)*

**CENSUS BUREAU RESPONSE:**

The Census Bureau appreciates the recommendation and will keep the Committee informed of any changes in our testing plans and the trade-offs that had to be balanced in making these changes.

- 5) **Recommendation:** Given the programmatic needs already identified by federal agencies through the outreach process articulated by the Director in his comments of April 26, 2017, Census should clearly explain the threshold for meeting a ‘programmatic need’ for including sexual orientation and gender identity questions on the American Community Survey.

**CENSUS BUREAU RESPONSE:**

The process for determining the subjects on the American Community Survey (ACS) is a rigorous, iterative process completed in conjunction with the Office of Management and Budget and coordinated across many federal agencies. If a federal agency wishes to obtain data through the ACS, the agency must submit a request. In making requests for content, a federal agency must submit a statement of the federal use, provide legal citation(s), and identify the ACS question(s) connected to the use and legal citation. The Department of Commerce Office of General Council then evaluates this submission in accordance with the following long-standing classifications set forth in Census Bureau policy on new content for the ACS and the 2014 ACS Content Review criteria:

- **Mandatory:** A federal law explicitly calls for use of decennial census or ACS data on that question.
- **Required.** A federal law explicitly requires the use of data and the decennial census or the ACS is the historical source; or the data are

needed for case law requirements imposed by the U.S. federal court system.

- **Programmatic:** The data are needed for program planning, implementation, or evaluation and there is no explicit mandate or requirement.

6) **Recommendation:** The NAC recommends that the Census Bureau assess the feasibility of a second write-in line for the AIAN response category in the paper version of the 2018 End-to-End Test given the length of many tribe and village names.

*This would maximize detailed reporting and mitigate the need for an extensive public campaign to inform AIAN respondents to a) write very small and/or b) use the margins.*

#### **CENSUS BUREAU RESPONSE:**

Enabling the reporting of detailed identities for all race/ethnicity groups has been a major objective of the Census Bureau's research for improving data on race/ethnicity over the past decade. The expansion of the write-in line for the AIAN category, within the race and ethnicity question, would require a split-panel test to assess any potential or unforeseen impacts to the data. There is no other census test before the 2020 Census that could test this change to the paper form.

The 2015 National Content Test (NCT) research shows, however, that on paper, about 70 percent of AIAN respondents provided a detailed responses in the Combined Question with Write-In Response Areas (see Table 11 from the 2015 NCT report).<sup>1</sup> While the Combined Question with Detailed Checkboxes was the most successful for all other race and ethnicity groups, for AIAN respondents, since the Combined Question with Write-In Response Areas provided the highest levels of detailed AIAN reporting on paper, the 2017 Census Test and the 2018 End-to-End paper form was changed to include this design feature. Given the relatively high reporting of detailed AIAN identities with this format, the Census Bureau expects this design will continue to allow respondents to effectively self-identify and report their detailed AIAN identities.

#### **Topic - Language Accessibility on 2020 Census:**

1) **Recommendation:** The NAC recommends that the Census Bureau use the December 2016 determinations under section 203 of the Voting Rights Act (which are derived from ACS data) as the starting point to identify Limited-English Proficient (LEP) language groups including American Indian and Alaska Native groups, and the location of the LEP people who speak them, as additional languages for which Census outreach and enumeration efforts should be targeted.

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<sup>1</sup> The 2015 NCT report is available online at [www.census.gov/programs-surveys/decennial-census/2020-census/planning-management/final-analysis/2015nct-race-ethnicity-analysis.html](http://www.census.gov/programs-surveys/decennial-census/2020-census/planning-management/final-analysis/2015nct-race-ethnicity-analysis.html).

#### **CENSUS BUREAU RESPONSE:**

As stated in the *Census Response to the NAC Recommendations from the Language Working Group*, the Census Bureau will use the most recent American Community Survey (ACS) estimates as the primary data source for identifying LEP households for the 2020 Census. The Census Bureau will identify households in which household members speak a language other than English at home, as well as households in which no one age 14 and over speaks English “very well” or speaks English only.

The 2016 determination of languages for Section 203 of the Voting Rights Act is derived from the 2010-2014 ACS 5-year estimates. Therefore, continuing to use the most current ACS estimates available, as the 2020 Census approaches, will provide a more accurate and wider representation of language needs for all potential respondents. However, the Census Bureau understands that the materials and processes created to comply with the Voting Rights Act, and to communicate with area-specific language groups about voting rights, may be excellent supplemental resources in ensuring sufficient coverage and scope of LEP populations.

- 2) **Recommendation:** The NAC recommends that within language groups, the Census Bureau should account for dialectical differences in outreach and enumeration.

*(For example, the Yup'ik language includes over two dozen spoken dialects; there are a sufficient number of variations in those dialects to require distinct translations.)*

#### **CENSUS BUREAU RESPONSE:**

In planning for the 2020 Census, the Census Bureau carefully considers the following: results and recommendations pertaining to variations within language groups, experiences or cultural practices, best practices, and variation or absence of spoken and written forms. Based on this information, the Census Bureau may conclude that some small and/or geographically concentrated language populations may be best served by an individual who is recruited and hired from within a particular community.

In this effort, the Census Bureau plans to leverage a robust network of Partnership Specialists, recruited at the local level, to focus on these language groups. In 2010, the Census Bureau employed Partnership Specialists and Assistants with the ability to work in 145 languages, and plans to recruit Partnership Staff with the ability to work in as many languages (and dialects) as possible for 2020. In addition, the Census Bureau will hire enumerators who reflect the diversity of the populations they are interviewing. Because of this focus on local hiring, the languages spoken by enumerators are likely to reflect the characteristics of the given population.

- 3) **Recommendation:** Because there has been little broadband penetration into AIAN communities on tribal lands (a 2011 FCC study estimated it at just under ten percent), the NAC recommends that the Census Bureau conduct most of the outreach and enumeration efforts in more geographically isolated tribal areas through other means. Wherever feasible, direct, in-person outreach and enumeration should be utilized through local tribal members who are fluent in English and the applicable local language and dialect.

**CENSUS BUREAU RESPONSE:**

The Census Bureau agrees and will follow this recommendation.

- 4) **Recommendation:** The NAC recommends that the Census Bureau should work with local translation panels to ensure that complete, accurate, and uniform information and instructions are provided by enumerators. Where feasible, a written translation that local translators/translation panels have determined is understandable to those in their community should be provided to the enumerator to be read to each LEP respondent. *(Although many of the AIAN languages are predominately oral in nature, several have written forms that are used within AIAN communities. Using translations written in AIAN languages, including oral translations that are phonetically spelled out, is a widely used approach. It has been used over the past decade in Alaska, and 203 covered jurisdictions have used it for nearly three decades in providing translations of registration and voter information in the Navajo language in Arizona, New Mexico, and Utah. It has proven to be the most effective at providing complete and accurate information to each person without being dependent upon the particular language skills - or lack thereof -- of enumerators through less accurate on-the-spot translations) (The Native American Voting Rights Coalition can put the Census Bureau in touch with the translation panels our members have worked with in Alaska and in the Midwestern and Southwestern States)*

**CENSUS BUREAU RESPONSE:**

The Census Bureau recognizes that special considerations are needed for languages where written text is less common than oral communication and where the number of professional translators and formal translation of documents may be limited. These special considerations include the recommendation that oral translations be phonetically spelled out for certain AIAN languages. When completing translation work for such languages, the Census Bureau will work with stakeholders to obtain additional input from local translation communities, where applicable.

- 5) **Recommendation:** The NAC recommends that an outreach brochure be translated in writing for written AIAN languages that are commonly used. The brochure should explain in concise terms the importance of participating in the Census and provide a blank for the person(s) within the community who are conducting outreach to provide their name and contact information.

**CENSUS BUREAU RESPONSE:**

The Census Bureau appreciates this recommendation and will explore producing such a brochure.

**Topic - 2020 Census Operational Readiness: Integrated Partnership and Communications Program**

- 1) **Recommendation:** The Census Bureau establish a Federal Interagency Working Group (FIWG) on Outreach modeled after the State of California's State Agency Working group on Outreach which was effective in both Census 2000 and the 2010 Census in creating millions of "impressions" on hard to count populations as well as general "awareness and motivation" impressions on all constituencies.

*The US Census Bureau could save money by leveraging already existing Federal Agency messaging vehicles (newsletters, emails, web banners, social media, check, mailings, pay stubs etc). Build stronger partnerships with federal agencies that use decennial and ACS data.*

**CENSUS BUREAU RESPONSE:**

The Census Bureau welcomes this recommendation. Partnerships at all levels will be crucial to reaching everyone and encourage them to participate, especially those populations considered hard-to-count or hard-to-reach. Leveraging channels already established by other federal agencies is a cost-effective way to use federal dollars to reach these groups. The Integrated Partnership and Communications Program will work on this initiative. For example, the National Partnerships Team has already started conversations with the U.S. Postal Service. The Community Partnership and Engagement Program (CPEP) through the State Complete Count Commissions (SCCC) and Complete Count Committees (CCC) include regional, state, and local offices of federal programs on these groups to ensure appropriate ways to share information and resources.

- 2) **Recommendation:** The Integrated Partnership and Communications Program (IPC), through the Federal Interagency Working Group (FIWG) on Outreach pursue Interagency Agreements with key federal programs that have "high touch and high trust" interaction with hard to count populations. The ICP working group will provide

the FIWG a specific list of federal programs that have "high touch, high trust" interactions with specific populations.

*If the IPC would like to understand how the State of California PAID WIC counselors at the county and local level to speak directly to WIC recipients, recommend the IPC office contact the California Complete Count Committee or read the report called "Counting All Californians: An analysis of outreach effectiveness" from Census 2000. (States have to pay WIC program providers for the minutes they spent talking about non-nutrition related topics).*

#### **CENSUS BUREAU RESPONSE:**

As mentioned in the previous recommendation, the Census Bureau welcomes this idea and will be working with the National Partnerships Team and CPEP toward this initiative. The Census Bureau will provide a list to the working group, but any additional input or ideas from NAC members are welcome.

- 3) **Recommendation:** The NAC recommends the Census Bureau give a high priority to outreach and communications/education for hard to count and reach groups to ensure higher levels of self-identification and participation in the 2020 Census and to improve awareness about the importance of the census data.

#### **CENSUS BUREAU RESPONSE:**

The Census Bureau understands that the IPC must spend greater efforts to reach hard-to-count groups and less effort for those who are more inclined to cooperate. The Census Bureau will selectively use the components of the IPC to work where they are most effective to encourage every household to respond. One key factor in reaching hard-to-count and hard-to-reach groups will be the Community Partnership and Engagement Program (CPEP). The CPEP objectives and goals are to reach specifically to the grassroots level of the hard-to-count low response score groups.

- 4) **Recommendation:** Before making final decisions on school outreach, Census Bureau should review their Census in Schools (Scholastic) program and their Statistics in Schools programs and share evaluation metrics with the NAC and develop more locally-tested school curriculum-based outreach programs.

*For example, IPC should review the California Complete Count Committee's Schools-Based Outreach Program. The toolkit included a California standard-aligned lesson plans for History-Social Science 4th, 5th, 8th, 11th and 12th graders. These lesson plans were rolled out in the highest Title 1 and Title 3 Counties and school districts. Working through the State Superintendent for Public Instruction, they engaged the County Office of*

*Education Curriculum Development Coordinators and developed "plug and play" lessons that would take a teacher less than 10 minutes to know when and where to implement.*

**CENSUS BUREAU RESPONSE:**

The Census Bureau appreciates this recommendation as we are planning the Statistics in Schools program for the 2020 Census. As part of our planning process, we intend to review the evaluations of the Census in Schools program, metrics from the recently launched Statistics in Schools program as well as work with our Community Partnership and Data Dissemination Programs before making final decisions on outreach.

- 5) Recommendation:** The NAC recommends that the Integrated Partnership and Communications' Campaign work with immigrant communities to get out the message that fully responding early by web or mail to the 2020 Census will minimize the likelihood of in-person visits from enumerators.  
*(This will help address fears immigrants may have of having government agents come to their home. This is similar to messaging used in 2010 Census.)*

**CENSUS BUREAU RESPONSE:**

The Census Bureau concurs with this recommendation and will be doing this through Communications and Partnerships efforts.

- 6) Recommendation:** The NAC recommends that the communications strategy needs to be tailored to the current and evolving environment affecting public trust in contact with federal agencies employees, and the targeted audiences should include the "trusted messengers," historically undercounted communities, as well as the public at large. The NAC further recommends that the Census Bureau report back to the NAC on how the communication strategy will alleviate fears that data might be used against responding communities.

**CENSUS BUREAU RESPONSE:**

The Census Bureau concurs with these recommendations and will take these actions.

## **Topic - Tribal Consultations Briefing**

- 1) Recommendation:** Census should provide NAC with a cost analysis of pursuing or abandoning the tribal enrollment questions.

### **CENSUS BUREAU RESPONSE:**

The 2017 Census Test is part of a program of research and testing the Census Bureau is conducting in preparation for the 2020 Census. The test was designed to test the feasibility of collecting information on tribal enrollment, as well as the integration of key data collection systems and the methods for enumerating areas with unique location characteristics. Subsequent to the design of the 2017 Census Test, the Census Bureau determined it would neither submit to Congress a topic on tribal enrollment in 2017, nor a question in 2018 for the 2020 Census or the American Community Survey. However, the Census Bureau believes the 2017 Census Test results will provide a useful contribution to overall research into this field.

## **Topic - Undercount of Young Children Working Group**

To reduce the undercount of young children in the 2020 Census, we recommend that the census consider the following:

- 1) Recommendation:** All of the components supporting the 2020 Census should appoint an individual responsible for the inclusion of the issues related to young children and the people in their lives. This includes but is not limited to partnerships, communications, ACS, field offices, enumerator training, etc.

### **CENSUS BUREAU RESPONSE:**

The Census Bureau recently approved the charter for the 2020 Census Undercount of Young Children Subteam (a subteam of the Coverage Improvement Integrated Project Team). This subteam is responsible for developing, coordinating, and managing activities aimed at improving the coverage of young children in the decennial census. Team membership includes people working on research related to the undercount of young children, enumerator training development, coverage improvement, and communications and partnership efforts. Team members are expected to be ambassadors to their respective areas as well as working on specific activities outlined in the charter.

- 2) Recommendation:** The continuation of the Undercount of Young Children Task Force within the Bureau with a minimum requirement of an annual report back to the NAC on findings as the research is further delineated.

#### CENSUS BUREAU RESPONSE:

The Census Bureau appreciates this recommendation and will keep the Committee informed on the Undercount of Young Children Subteam findings.

- 3) Recommendation:** That the CCM/PES (Coverage Measurement Survey) for 2020 have definite elements pertaining the count of young children.

#### CENSUS BUREAU RESPONSE:

Like the 2010 Census Coverage Measurement Survey, the 2020 Post-Enumeration Survey will estimate the net coverage and components of census coverage for children by three age groups: 0 to 4, 5 to 9, and 10 to 17.

### 2015 NCT Report

- 1) Recommendation:** The NAC supports the Bureau's selection of an optimal design for the 2020 census race / ethnicity item, and recommends that this format be submitted to Congress in 2018 as the proposed question wording.

#### CENSUS BUREAU RESPONSE:

The Census Bureau appreciates and accepts the recommendation.

- 2) Recommendation:** The NAC recommends that the Census Bureau analyze and report on the data it collected on the fluidity and external classification of race as part of the 2015 National Content Test (NCT).

#### CENSUS BUREAU RESPONSE:

The NCT Analysis Team is considering explorations like this as work and preparation continues for the 2020 Census, as well as the analysis and understanding of the increasingly complex racial/ethnic identification and the growing diversity of the nation's population. The Census Bureau appreciates the NAC's encouragement for this research.

- 3) Recommendation:** The NAC encourages the Census Bureau to analyze its 2015 National Content Test data to better understand why multiple-race reporting has relatively low consistency rates (e.g. Exploring some potential correlates with inconsistent multiple reporting).

#### CENSUS BUREAU RESPONSE:

The Census Bureau is considering explorations like those suggested by NAC as work and preparation continues for the 2020 Census. The Census Bureau appreciates the NAC's encouragement for this research as it supports ongoing analyses and goals to understanding and describing the increasingly complex racial/ethnic identification and growing diversity of the nation's population.

- 4) Recommendation:** The NAC encourages the Census Bureau to analyze the reporting patterns of people filling out the census on small devices versus larger ones (e.g. phones or tablets versus laptops and desktops) in order to understand which factors (such as age) may explain the disparities in response rates, detailed reporting, and multiple-race reporting.

#### CENSUS BUREAU RESPONSE:

The Census Bureau agrees that it is important to understand the reporting patterns of people who are responding in one data collection mode compared with another mode. The 2020 Census is designed with a multimode approach to make it easier for the public to respond, and it is believed that this will also make it easier for traditionally harder-to-count populations to participate in the census. For instance, Census Bureau research has found that younger adults are more likely to respond using smaller devices such as smartphones. It is known that younger people are more likely to identify with more than one race or ethnicity, and that these complex identities are an important part of understanding the nation's growing diversity. The Census Bureau also recognizes that there are differences in detailed race/ethnicity reporting by age group. These factors contribute to some of the results in the 2015 NCT report, such as higher multiple group reporting and lower detailed reporting among smartphone respondents. The Census Bureau will continue to assess the design and functionality of each of the reporting instruments in the future to ensure that all respondents can recognize their options to report and provide the most accurate data possible reflecting their self-identification.

- 5) Recommendation:** The NAC recommends that Census convene a working group to study and make recommendations on the addition of sexual and gender identity questions to the American Community Survey.

#### CENSUS BUREAU RESPONSE:

As stated in our response to recommendation #5, the process for determining the subjects on the American Community Survey (ACS) is a rigorous, iterative process completed in conjunction with the Office of Management and Budget

(OMB) and coordinated across many federal agencies. If a federal agency wishes to obtain data through the ACS, the agency must submit a request. In making requests for content, a federal agency must submit a statement of the federal use, provide legal citation(s), and identify the ACS question(s) connected to the use and legal citation. The Department of Commerce Office of General Council then evaluates this submission in accordance with the following long-standing classifications set forth in Census Bureau policy on new content for the ACS and the 2014 ACS Content Review criteria:

- **Mandatory:** A federal law explicitly calls for use of decennial census or ACS data on that question.
- **Required.** A federal law explicitly requires the use of data and the decennial census or the ACS is the historical source; or the data are needed for case law requirements imposed by the U.S. federal court system.
- **Programmatic:** The data are needed for program planning, implementation, or evaluation and there is no explicit mandate or requirement.

Throughout this process, the Census Bureau works in collaboration with OMB, and the Interagency Council on Statistical Policy's Subcommittee on the ACS (ICSP-SACS).

In 2015, the OMB convened a *Federal Interagency Working Group on Measuring Sexual Orientation and Gender Identity*. As stated in the working group's charter:

"The working group will explore measurement of Sexual Orientation and Gender Identity (SOGI), considering multiple different dimensions of sex, gender, and sexuality. The working group will examine variability in measurement by age, race, ethnicity, and cultural group. It will prepare recommendations to OMB and other Federal agencies for the development, testing, and usage of SOGI measures to more accurately describe Lesbian, Gay, Bisexual, and Transgender populations."

The Census Bureau participates in this OMB Interagency Working Group and remains actively engaged in the discussion of how to develop and implement quality measures of both sexual orientation and gender identity.

- 6) Recommendation:** Regardless of the outcome of the OMB revisions to its standards, the NAC recommends that Middle Eastern and North African (MENA) category should be included and tabulated in the 2020 Census.

## CENSUS BUREAU RESPONSE:

The Census Bureau will continue to research the race/ethnicity question optimal design during the 2018 End-to-End Census Test based on 2015 National Content Test results. The final determination has not been made on the format of the race/ethnicity question for the 2020 Census. As part of ongoing work with OMB and the Federal Interagency Working Group, the Census Bureau and other federal agencies are in dialogues about the NCT results, other data inputs, and feedback from the public through the Federal Register Notice process to discuss and develop solutions to recommend to OMB for improving race/ethnicity data.

The Census Bureau will continue to engage with NAC and our other advisors and stakeholders as these discussions continue. OMB will decide on the race/ethnicity standards during the fall and winter of 2017. Once a decision is made by OMB, this will enable the Census Bureau to prepare and submit final question wording for the 2020 Census during the winter to spring of 2018. Final question wording on the 2020 Census content must be submitted to Congress by April 2018.