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

SEP 27 2018

MEMORANDUM FOR: Carol Gore
Chair
Census National Advisory Committee

From: Ron S. Jarmin
Performing the Nonexclusive Functions
and Duties of the Director
U.S. Census Bureau

Subject: U.S. Census Bureau Responses to Census National Advisory Committee Spring 2018 Recommendations

The U.S. Census Bureau thanks the Census National Advisory Committee for its recommendations. We are responding to the committee recommendations submitted during its June 14-15, 2018, meeting.

Your expertise is necessary to ensure that the Census Bureau continues to provide relevant and timely statistics used by federal, state, and local governments, as well as business and industry, in an increasingly technologically oriented society.

Attachment

Recommendations and Comments to the Census Bureau from the Census National Advisory Committee during 2018 Spring Meeting

To: Ron S. Jarmin
Associate Director for Economic Programs
Performing the Non-Exclusive Functions and Duties of the Director

From: Ditas Katague, Chair, NAC

Date: June 15, 2018

Section I: Race & Ethnicity

1. NAC reiterates its recommendation that the Census Bureau use the combined question format for the 2020 Census and American Community Survey, which has been supported by over a decade of research which has shown to yield the best count. To that end, we also continue to support the addition of MENA response options to the combined question. We also believe the combined question that maintains the separation of Asians and NHOPI from each other best complies with OMB 1997 standards and support maintaining the separation in any question format.

   The Census Bureau appreciates the NAC's continued interest in this issue, but we are unable to act on this recommendation. The Census Bureau and every other agency must follow the most recent race and ethnicity standards for the federal government set by the U.S. Office of Management and Budget (OMB). In keeping with OMB standards, which remain unchanged since 1997, the planned race and ethnicity questions for the 2020 Census will follow a two-question format for capturing race and ethnicity. That format was used during the 2018 End-to-End Census Test. There will not be a separate Middle Eastern or North African category. The 2020 Census will differ from the 2010 Census by collecting multiple Hispanic ethnicities, such as Mexican and Puerto Rican; adding a write-in area and examples for the White racial category and for the Black racial category; removing the term "Negro"; and adding examples for the American Indian or Alaska Native racial category.

2. In the event there is no combined question with a MENA option, NAC recommends the Census Bureau conduct testing of the MENA category as an ethnicity.

   The Census Bureau notes the NAC's recommendation. There will not be a separate Middle Eastern or North African category. The MENA category was tested extensively in the 2010 Census Program for Evaluations and Experiments and in mid-decade testing. The Census Bureau remains committed to researching our population and the best way to measure its diversity.

3. In the separate questions format, NAC recommends that the Census Bureau allow multiple Latino origins responses under the Hispanic origin question as the question is being tested in the 2018 end to end test. The 2020 Census Hispanic origin question should include instructions to count more than one and those responses should be tallied.

   The Census Bureau does not accept the recommendation to include an instruction to solicit more than one response in the ethnicity question. The Census Bureau must adhere to the 1997 OMB Revisions to the Standards for the Classification of Federal Data on Race and Ethnicity, which remain in effect. The 1997 OMB standards do not permit the collection of both "Yes, of Hispanic or Latino origin" and "No, not of Hispanic or Latino origin" responses to the ethnicity question.

Section II: Citizenship Question

1. The NAC strongly opposes the use of a citizenship question in the 2020 census. It has not been tested on a contemporary census, is unnecessary, and is likely to significantly deter participation.

   The Census Bureau notes the NAC's opposition to the question. The Census Bureau executes the decennial census based upon the direction of the Secretary of Commerce under his authority in Title 13. In 2020, that will include a citizenship question that has been asked on the American Community Survey (ACS). Its extensive use in the ACS – where it has been answered by 42 million households – far exceeds any testing sample size the Census Bureau could conduct and demonstrates that the question can be used successfully in a survey.

   Responding to the 2020 Census is required by law, and we will have a robust partnership and communications program that will encourage self-response by targeting the right messages to the right audiences in the right places. We share concerns about confidentiality. The law is clear – the answers a person provides on a census form may not be used for law enforcement or any other purpose that would reveal the person's identity or how they responded to a question. Anyone who handles Census Bureau data takes an oath to keep those data confidential for life. Under Title 13, using census responses for any other reason than to produce population statistics is punishable by fines and up to five years in prison.

2. NAC recommends the Census Bureau evaluate and report on any observed or documented changes in responsiveness or respondent activity or attitude with respect to the citizenship question in the ACS in the last two years, in an expedited schedule.

   The Census Bureau continually monitors the accuracy and reliability of the ACS data using several quality measures, including sample size, coverage rates, response rates, and item allocation rates.

3. If the 2020 Census form includes a citizenship question, NAC recommends the Census Bureau not use NRFU activities (including in-person enumerators, follow-up calls or proxy interviews) for non-response to the citizenship question.

   The Census Bureau does not accept the recommendation. If someone does not answer the 2020 Census or any other question on the form, they increase the likelihood of an in-person visit from the Census Bureau.

4. NAC recommends the Bureau will work with NAC members to develop protocols to count AIAN respondents in regard to the citizenship question.

   a. *Explanation*: Native American groups have just completed field hearings in Indian Country in which witnesses were asked how they would answer on the 2020 decennial form a proposed question, "Are you a citizen of the United States (Yes or No)?" Witnesses responded that they will either answer just "No," or will answer "No" and write in the name of their tribe or Native village because they consider themselves citizens of the tribe or village and not the United States even though under the law they are United States citizens.

   Recommendation accepted. The Census Bureau works closely with the AIAN community and tribal leaders through formal tribal consultations and regular, ongoing conversations. The Census Bureau will discuss with the AIAN community, and address, through the partnership and communications program, these issues.

5. The Census Bureau's National Advisory Committee on Race, Ethnic and Other Populations strongly recommends that the Census Bureau provide an update at next NAC meeting in the Fall 2018 on the coverage measurement plans to evaluate the accuracy of the 2020 Census, especially in light of the addition of the citizenship question. This update should include information on timing of the availability of the evaluation and the impact on the cost of the evaluation.

   Recommendation accepted. We will plan to present our coverage measurement plans at the next NAC meeting.

6. NAC request that the Census Bureau provide it with a plan of action across different components of the 2020 Census to address the likely decline in self-response rate due to the addition of the last-minute citizenship question, particularly in the immigrant community and other HTC communities, including providing an evidence-based assessment of impact on self-response rate and the cost.

   The 2018 End-to-End Census Test is underway and although it does not include a citizenship question, it is noteworthy that although the results are not final, our response rates are higher than projected and our NRFU workload is more efficient than projected. The test started soon after the 2020 Census questions were delivered to Congress and the discussion around the citizenship question began.

Also, it is important to note that the Secretary has stated that he took the possibility of increased NRFU into account when he decided to reinstate the citizenship question. As set forth in his March 26, 2018 decision memorandum, a copy of which is available at https://www.commerce.gov/sites/commerce.gov/files/2018-03-26_2.pdf, the Census Bureau estimated that the reinstatement of the citizenship question could potentially increase non-response follow up costs by up to 0.5 percent, which would equate to a potential cost increase of up to $27.5 million. However, as discussed in the Secretary's decision memorandum, this increased cost is well within the scope of the contingency funding included in the October 2017 Lifecycle Cost Estimate provided to Congress. Actually, an increase in costs several times the Bureau's estimated amount would be well within the scope of these contingency funds. While the Census Bureau in 2017 predicted a self-response rate of 60.5%, the Lifecycle Cost Estimate included contingency funding for several possible variables, including a reduction in self-response to 55%. So although the current Lifecycle Cost Estimate was prepared before the reinstatement of the question and therefore could not have included its impact in the self-response assumption, the Lifecycle Cost Estimate adopted by Congress in the FY 2018 Omnibus Act provides more than sufficient funding to address the potential drop-off in self-response that the Census Bureau predicted could result from reinstating the question.

7. NAC recommends that the Census Bureau provide assurances that without regard to the ultimate disposition of the addition of a citizenship question to the 2020 decennial Census form that future Section 203 determinations continue to be made using ACS data.

    a. *Explanation*: Section 203 of the Voting Rights Act provides that coverage determinations under the Act shall be made "based on the 2010 American Community Survey census data and subsequent American Community Survey data in 5-year increments, or comparable census data."

Recommendation not accepted. On its face, Section 203 empowers the Census Bureau Director to make determinations based on both ACS and other census data.

8. In keeping with long-standing practice, NAC recommends that the Census Bureau not include citizenship data in the Public Law No. (P.L.) 94-171 redistricting files.

Recommendation not accepted. Public Law 94-171 charges the Census Bureau with providing "the officers and public bodies having initial responsibility for the legislative apportionment or districting of each state…" with the "tabulations of population" needed for legislative redistricting for the geographic areas they identify as desired. The Census Bureau's long standing practice is to provide both the total population by race and ethnicity and the voting age population by race and ethnicity as parts of the P.L. 94-171 Redistricting Data File, as the states have expressed these categories as needed for creating and analyzing redistricting plans. In keeping with this practice, the Census Bureau will assess any expressed needs of the states in light of citizenship

data being available for inclusion. Should a change from the prototype version of the P.L. 94-171 Redistricting Data File being produced from the 2018 End-To-End test be warranted, then that new design will be presented for public comment with extreme weight being given to the needs of those officers and public bodies within the states as identified in the law.

9. In the interest of transparency and public trust, Census should immediately inform NAC members (via conference call and/or webinar), of the recommendation of its internal "working group", regarding how it will respond to incomplete responses to the citizenship question, and solicit NAC feedback prior to finalizing.

   The Census Bureau understands your interest and will get back to the Committee in a timely manner.

1. *Communications Activities*

   a. Use "rapid response" funding now to communicate with the public about privacy and confidentiality of Census data, especially with respect to responses to the citizenship question. The crisis of public confidence as a result of the citizenship question addition has already reached the level of emergency.

      Recommendation not accepted. The Rapid Response operation is designed to respond in near-real-time to response rates that are lower than projected at a particular point in time during data collection. This effort occurs through partnership and communications activities to boost response rates in an area where response is lower than anticipated. The Census Bureau has robust, ongoing communications efforts regarding privacy and confidentiality, including a recent Director's Blog on the subject and other daily conversations with partners and stakeholders. This topic also will be prominently featured in the 2020 Census communications campaign Team Y&R will design.

   b. Create materials for community partners and the public that respond to specific concerns raised by the inclusion of the citizenship question, including whether people are required to respond to the citizenship question and what enforcement activities will take place if people do not respond to the citizenship question.

      Both responding to the census and ensuring the confidentiality of those responses is required by law. The answers a person provides on a census form may not be used for law enforcement or any purpose that would reveal anyone's identity or how an individual responded to a question. Anyone who handles Census Bureau data takes an oath to keep those data confidential for life. Under Title 13, using these personal data for any other reason than to produce population statistics is punishable by fines and up to five years in prison.

      We provide the public with this information regularly. We will continue to do so through our 2020 Census Integrated Communications Contract and a multichannel,

sophisticated, data-based campaign. Electronic and paper-based materials addressing many potential issues respondents may raise will be developed in close coordination with Team Y&R. As we analyze the results from both the CBAMS survey and focus groups, the data will guide the development of the right messages and the right materials to address these topics. In addition, the Census Bureau is working closely with several national and community partners to develop and launch several focus groups targeting hard-to-count populations.

c. Conduct specific research into messaging about the citizenship question for AIAN (American Indian and Alaskan Native) communities.

Recommendation accepted. We have specific CBAMS information from the focus groups conducted with AIAN communities, and we are currently analyzing these data. We will continue working with AIAN groups exploring messaging on issues related to this community.

Section III: Update on Language Services Operations

Languages Used for Census Outreach

1. The NAC recommends that the Census Bureau provide translations of Census 2020 information and publicity in the Central Yup'ik dialect of Yup'ik in its activities in Alaska.

    a. *Explanation:* Among United States citizens of voting age (CVAP), the Alaska Native language of Yup'ik is the most widely spoken non-English language. Over 30,000 Alaska Natives identify as Yup'ik. Over three-quarters of all Alaska Natives who identify as Yup'ik are fluent in the language. According to the Census Bureau's most recent language determinations issued in December 2016, nine county-level jurisdictions in Alaska are covered under Section 203 of the Voting Rights Act for the Alaska Native language of Yup'ik. There are over one dozen dialects of Yup'ik that are spoken in Alaska, with Central Yup'ik being the most common.

The Census Bureau does not accept this recommendation. Section 203 of the Voting Rights Acts directs the Census Bureau Director to make determinations for the purpose of informing jurisdictions of the minority language groups for which they must provide voting materials. While important for Voting Rights Act enforcement, the Section 203 determinations have no relation to Census Bureau operational planning. The 2020 Census Language Services Operation is responsible for identifying ways to reduce language barriers to enumeration for respondents of limited English proficiency. Language selection is based on the needs of limited-English-speaking households, not on the total number of speakers of a language. Based on our criteria, the estimate of Yup'ik-speaking limited-English-speaking households does not indicate a need for national-level support.

The Census Bureau believes that a community-translation process will be the best option for creating 2020 Census materials in Yup'ik. The Census Bureau plans to

provide a template of the print language guide in 2019, so that the Yup'ik-speaking community and its partners can translate and disseminate the language guide.

In the Remote Alaska operation, enumerators will visit every housing unit and attempt to conduct an interview. In the summer and fall of 2019, the Census Bureau will visit all remote villages and communities to prepare for enumeration. During these visits, the Census Bureau will work with village and community leaders to identify individuals who are familiar with the culture and language of those residing in Remote Alaska and can work as enumerators and cultural facilitators. In addition, the Census Bureau will work with Alaska partners to reach geographically specific populations within Alaska and provide assistance in different languages, including Yup'ik.

2. NAC recommends that message testing focus groups begin within AIAN communities to account for extended time needed for translation and dissemination of materials to AIAN communities.

    a. *Explanation:* The Bureau's failure to provide translations and language support for any American Indian or Alaska Native languages who do outreach and organizing to American Indian and Alaska Native people to allow those partners and groups sufficient time to translate the materials in American Indian and Alaska Native languages for which the Bureau is not going to provide coverage for the 2020 Census other than Navajo contributed to the most significant undercount of any racial or ethnic group in the 2010 Census (estimated at 4.9 percent of all American Indians living on tribal lands) and is expected to do the same in the 2020 Census among a group that is among the hardest to count populations.

The Census Bureau advises the NAC that this recommendation falls under the communications contract, not the language services program. The Census Bureau, along with its contractor Team Y&R, is reviewing the message testing schedule to identify any efficiencies that may result in an earlier start. Our goal is to thoroughly test messaging for the paid campaign with all target audiences prior to use. The Census Bureau will share other materials as they become available and will encourage our partners to translate them into any language necessary to reach audiences for which translated materials have not been provided.

3. The Census Bureau should, at a minimum, include in their list of languages for language assistance guides those languages recommended by the previous Race and Ethnicity Advisory Committees for the 2010 list of languages for their language assistance guides.

The Census Bureau does not accept this recommendation. The language selection for the 2020 Census Language Services Operation is based on a data-driven approach. The Census Bureau selects a language for an assistance guide when at least 2,000 households have no usual resident or proxy 14 years or older that speaks English greater than "very well." In other words, languages spoken in households often

referenced as limited-English-speaking households would be considered for language assistance guides – provided that the household number threshold is met. Based on these criteria, the languages recommended by the previous Race and Ethnicity Advisory Committees from 2010 do not meet our threshold for the 2020 Census language support.

For the languages that do not meet the threshold for the 2020 Census Language Services Operation, the Census Bureau will provide templates and shells of the print and video guides to enable community members and partners to produce language support materials for additional languages. These templates and shells, which did not exist during the 2010 Census, are a significant innovation for the 2020 Census and part of a larger effort to integrate with and support the partnership staff in their effort to help reduce language barriers throughout the country.

Section IV: Demonstration on Recruiting and Assessment

Online application

1. The NAC recommends that the online and paper applications for Census enumerators and trainers add two additional questions: (a) tribe or Native village; and (b) whether the applicant was referred by any organization or individual (to allow them to identify if their tribe or other Native organization recommended them).
    a. *Explanation:* During field hearings in Indian Country, witnesses testified the need to have trusted messengers from their own tribes serving as Census enumerators. To do that, it is critical that Census know the applicant's tribe or Native village, and not just their race or ethnicity (not just AIAN). In addition, tribal governments and regional and local Native organizations are the best sources of identifying trusted messengers and bilingual individuals to serve as Census enumerators.

Recommendation partially accepted. Since recruiting for the 2020 Census begins in September 2018, the questions on the job application have been determined already. One of the questions does allow the applicant to enter the referring organization. However, hiring decisions cannot be made based upon how the applicant was referred. Applicants must meet the criteria specified for the position.

The Census Bureau does recruit and hire locally, using geographic codes (for example, census tract numbers) to all applications. Assigning geocodes allows us to narrow the geographic areas from which we hire enumerators, to help ensure we hire enumerators to work in their own neighborhoods. We hire locally because local residents know their neighbors and their neighborhoods. In addition, hiring locally is the most efficient and cost-effective way to get the work done in the field because we pay time and mileage (if appropriate) from the time an enumerator leaves home until the enumerator returns home (minus any personal time and mileage).

General recruitment

1. The NAC recommends that generally Census enumerators on tribal lands be drawn from trusted messengers from the particular tribe or Alaska Native village who will be conducting the enumeration on those tribal lands, with a particular emphasis on enumerators fluent in any Native language spoken in the area being enumerated.

    a. *Explanation:* During field hearings in Indian Country, witnesses testified the need to have trusted messengers from their own tribes serving as Census enumerators. To do that, it is critical that Census know the applicant's tribe or Native village, and not just their race or ethnicity (not just AIAN). In addition, tribal governments and regional and local Native organizations are the best sources of identifying trusted messengers and bilingual individuals to serve as Census enumerators.

    Recommendation not accepted. The law does not allow the Census Bureau to make hiring decisions based on race and ethnicity. When there is a local need for enumerators to communicate in a language other than English, we do factor this need into recruitment and hiring. However, all applicants must be able to communicate in English.

2. The NAC recommends that Census trainers conducting training for enumeration on tribal lands be trusted messengers from the particular tribes or Alaska Native villages where the enumerators being trained will be conducting the enumeration in those tribal areas.

    a. During field hearings in Indian Country, witnesses complained that Census trainers conducting training for enumerators on tribal lands were non-Natives providing training on cultural sensitivity to enumerators, many of who were American Indian or Alaska Native and lived in the areas being enumerated, which was offensive to those AIAN enumerators.

    Recommendation not accepted. The Census Bureau must provide equal employment opportunity for employees and applicants for employment, which prohibits discrimination on the basis of race, color, religion, sex, national origin, age (40 and over), Genetic Information Nondiscrimination Act (GINA) disability, sexual orientation, or reprisal for filing a previous EEO complaint. Therefore, the Census Bureau does not use race or ethnicity to make hiring decisions.

3. The NAC recommends that the Census Bureau place a special emphasis on recruiting members of other socio-economically disadvantaged groups to serve as Partnership Specialists, trainers, enumerators and other positions for the 2020 Census.

    Recommendation accepted. The Census Bureau intends to recruit from a wide variety of sources, including partners that work with socioeconomically disadvantaged groups. In addition, the Census Bureau is seeking waivers that will allow individuals receiving Temporary Assistance for Needy Families (TANF), Tribal TANF, and the

Supplemental Nutritional Assistance Program (SNAP) to work on the 2020 Census without having their benefits reduced.

Section V: Cybersecurity in the 2020 Census

1. NAC recommends that the Census Bureau through their communications plan to identify the correct messengers and messages to relay the assurance to the public that it is safe to fill out their census survey online.

   Recommendation accepted. The Census Bureau and Team Y&R, are analyzing quantitative and qualitative research from the CBAMS. That research will be paired with subject matter expertise from Team Y&R and its subcontractors to develop the appropriate message for every audience. The main focus of these messages will be that 2020 Census answers are safe, secure, and confidential.

Section VI: Update on Integrated Partnership and Communications Program

1. NAC recommends that all IPC messaging, future qualitative and quantitative research (including additional CBAMS research), marketing and paid advertising strategies targeting Black population to reflect its diversity and people of African descent, including foreign born and Black immigrants, as well as native born African Americans.

   Recommendation accepted. The 2020 CBAMS survey included 50,000 households with more than 17,000 completed surveys (which will yield statistically significant results) and 42 focus groups. In contrast, the foundational CBAMS effort for the 2010 Census only had 4,000 respondents and no qualitative (focus group) component. The 2020 CBAMS survey oversampled geographic areas with high concentrations of minorities and with low and high propensities to respond. This included 7,000 Black with low propensity to respond households and 6,000 Black with high propensity to respond households. This combined sample size was the largest of all race and ethnicity breakouts in the survey. We also conducted four Black/African American focus groups to garner additional information to inform creative development. We are just beginning the 2020 CBAMS data analysis and are eager to share what we learn when analysis concludes in the fall.

   The CBAMS data will inform the creative campaign developed by Team Y&R and the specific expertise of our multicultural partner and subcontractor Carol H. Williams. The campaign will target varied audiences with relevant, culturally sensitive, and effective messages to increase self-response rates with a strong focus on hard-to-count audiences. Once the creative executions are developed, they will be tested through focus groups representing more detailed sub-populations.

2. NAC recommends the Census Bureau convene a gathering of leadership of State Complete Count Committees in (August/September) 2018 for the purpose of engaging in discussions about planning, timelines, coordination, resources, sharing strategies/initiatives and best practices.

The Census Bureau accept with condition and will pursue state level Complete Count Committees (CCCs) leader meetings in late 2018 or early 2019 to provide technical census information and share best processes among state CCCs.

Section VII: Integrated Partnership and Communications Working Group

Communications and Partnerships Recommendations

2. *Language Access*

   a. Give micro-grants or use communications contract funding to support translation activities for languages not already covered by Census Bureau non-English materials.

      Recommendation not accepted. We understand your concern about the number of languages that the 2020 Census Integrated Partnership and Communications Program will cover. However, the Census Bureau does not have grant authority. Therefore, we cannot provide microgrants or divert funding allocated to the communications contract or other 2020 Census related activities to support translation activities by outside entities.

3. *Timing*

   a. Use increased funding from Congress to conduct CBAMS analysis and message testing earlier. Complete activities by March 2019.

      Recommendation not accepted. The Census Bureau and Team Y&R are committed to conducting a thorough analysis of CBAMS data to ensure that we clearly understand what will motivate each target audience to complete their census questionnaire, as well as their barriers to responding, and develop appropriate messaging. We are working expeditiously to analyze the thousands of survey responses, as well as transcripts from the 42 focus groups, so that we can begin the creative process and provide the findings to you and our partners. We hope you and our partners will use those findings to craft and translate additional messaging that will supplement our efforts and reach audiences for which non-English materials are not developed by the Census Bureau. However, we must recognize that, even with additional funding, the capabilities of both Census Bureau and Team Y&R staff are limited and CBAMS results can only be available later this fiscal year. Creative testing will be implemented in March 2019 and will be completed in about 8-12 weeks. At this point, it would not be realistic to set expectations of these milestones being completed at an earlier date. The Census Bureau is committed to sharing results with the NAC, briefing Committee members on these results, and making the Committee part of the creative testing process.

   b. Begin communications activities to historically undercounted communities by March 2019 using plans designed for the Strategic Early Education Campaign, originally intended to be launched in January 2019 but then modified to November 2019 more recently.

The Census Bureau assures the Committee that while paid advertising is not starting until November 2019, other communications activities to reach historically undercounted communities have already begun, so the Strategic Early Education phase has already started. As stated on page 50 of the Communications Plan, the Strategic Early Education Campaign will be implemented through, "Ongoing and planned activities through the Census Bureau's National Partnership Program, Community Partnership and Engagement Program (CPEP), Statistics in Schools (SIS) program, and Field Division work, as well as public relations outreach for decennial and other data collection efforts [that] will be critical during this phase to reach and engage audiences and markets that will require early education." Partnership specialists are currently working across the country to reach and engage audiences that require early education. Hiring of partnership specialists began October 2015, and as of July 2018 more than 125 specialists have been hired and working. Starting in October 2018, a serious ramp-up will occur with the hiring of over 1,000 specialist who will began working specifically in Hard to Count (HTC) communities. The National Partnership Program is actively engaging organizations, companies, and other entities with a national focus to use their platforms to help us recruit and begin early education work. SIS is an evergreen program and has activities and materials that are ready to use. We will continue to develop additional materials to support all of these components and increase efforts to reach those that require early education. All these activities will be greatly expanded in October 2018 as we ramp up the entire Integrated Partnership and Communication (IPC) Program.

c. Ensure that communications materials are made available by March 2019 so that community partners have adequate time to translate materials into languages not covered by existing Census Bureau translation programs.

The Census Bureau is constantly developing communication materials that we will make available to community partners on a flow basis. As we have done previously, we will make all materials available on our website for anyone interested in using them. Both the National Partnership and CPEP programs have already developed some materials, and we expect Team Y&R to deliver materials and products during the first quarter of FY2019.

4. *Communications Activities*

a. Use "rapid response" funding now to communicate with the public about privacy and confidentiality of Census data, especially with respect to responses to the citizenship question. The crisis of public confidence as a result of the citizenship question addition has already reached the level of emergency.

Recommendation not accepted. The Rapid Response operation is designed to respond in near-real-time to response rates that are lower than projected at a particular point in time during data collection. This effort occurs through partnership and communications activities to boost response rates in an area where response is lower than anticipated. The Census Bureau has robust, ongoing communications efforts

regarding privacy and confidentiality, including a recent Director's Blog on the subject and other daily conversations with partners and stakeholders. This topic also will be prominently featured in the 2020 Census communications campaign Team Y&R will design.

b. Create materials for community partners and the public that respond to specific concerns raised by the inclusion of the citizenship question, including whether people are required to respond to the citizenship question and what enforcement activities will take place if people do not respond to the citizenship question.

Recommendation accepted. Electronic and paper-based materials addressing all potential concerns will be developed in close coordination with Team Y&R. As we analyze the results from both the CBAMS survey and focus groups, the data will guide the development of the right message and the right materials to address these topics. In addition, the Census Bureau is working closely with several national and community partners to develop and launch several focus groups covering this particular topic with hard-to-count populations.

c. The Bureau should work with the Department of Justice and other federal agencies to ensure that the policies of the Census Bureau are also articulated by the Department of Justice and other federal agencies.

Recommendation accepted. We will work with the Department of Justice and others to articulate the policies of the Census Bureau as they relate to communications activities for the 2020 Census and beyond.

d. Ensure rapid response "task force" is in place to respond to concerns of community members that integrates communications activities with partnerships activities.

A key part of our communications plan is to conduct rapid response activities to address issues as the 2020 Census unfolds. Through campaign optimization activities, the IPC program will respond to the data that comes in during the enumeration and by conducting crisis communications for unforeseen events. All areas of the IPC, such as partnerships, social media, and paid advertising, will be taken into consideration when selecting the right communications tactics to address these issues. In addition, the Census Bureau and Team Y&R will have a team structure, governance, and playbook with preapproved actions and messaging for potential situations in order to establish decision-making processes and responsibilities.

e. Share detailed Partnerships rapid response plans with the National Advisory Committee.

The Census Bureau will continue to share its plans with the National Advisory Committee and looks forward to the Committee's continued engagement and expertise.

f. Share detailed, community-specific plans for outreach to hard to count communities with the National Advisory Committee for input and feedback by December 2018.

The Census Bureau will continue to share its plans with the National Advisory Committee and looks forward to the Committee's continued engagement and expertise. During the rest of the year, the Census Bureau plans to share several documents with the Committee that will offer a better understanding of how we plan to reach hard-to-count populations, such as the CBAMS report and the creative platform.

g. Create detailed, community-specific plans for outreach to all hard to count communities, including parents of young children, low-income people, people experiencing homelessness and housing instability, and other hard to count segments.

Recommendation accepted. The Census Bureau's robust communications and partnership program will target hard-to-count communities through on-the-ground, local, trusted voices and partners and through targeted advertising across various channels depending on which channel is most used by a particular audience. The example communities mentioned are indeed focus areas for our efforts, and we plan to develop specific communications tactics to reach them.

h. Share with the National Advisory Committee the amounts spent in 2010 on communications activities directed to hard to count communities.

Communications activities for the 2010 Census were designed to reach everyone, with a heavy emphasis on hard-to-count audiences. We are able to provide amounts spent in 2010 by component. However, the only component for which funds were tracked by audience was paid media. While we are able to provide the amount spent on media buys by audience, it is important to understand that the diverse mass audience encompasses anyone who consumes English language media regardless of race or ethnicity. Therefore, the diverse mass media expenditures include vehicles that reach a variety of audiences and this cannot be broken down any further. Please see attachment with further information.

i. Create a communications campaign that will assist the public in understanding how best to answer the new race and ethnicity questions.

Recommendation accepted. The Census Bureau's robust communications and partnership program will help the public understand how to fill out the 2020 Census questionnaire. As we analyze the results from both the CBAMS survey and focus groups the data will inform development of the right message and the right materials addressing this particular topic.

j. Create an easy to understand handout for trusted messengers to better understand Title XIII privacy protections.

Recommendation accepted. The Census Bureau's robust communications and partnership program will create messaging for the public and for trusted messengers to understand how information is protected by law.

5. *Communications and Messaging Research*

a. Conduct additional research activities concerning how best to reach people impacted by natural disasters, especially people in Puerto Rico and Hawai'i.

Recommendation accepted. The Census Bureau has been working hard to expand outreach and communications strategies in areas affected by disasters. Through the CBAMS research, we conducted focus groups in both Houston and Puerto Rico. In these areas, we specifically asked probing questions related to natural disasters. In Puerto Rico, we conducted two different sets of focus groups in urban and rural areas to gather information representing different perspectives. During the creative testing research, we plan to further expand research on areas affected by natural disasters and adapt this information to future usage. During FY19 Q2, we plan to conduct a workshop with Team Y&R and Census Bureau staff on disaster-specific planning in support of the IPC program.

In addition, Team Y&R is utilizing Y&R San Juan, a creative agency with experience reaching Puerto Rican audiences through compelling advertising. They have worked with MMM, a local Medicare Advantage Plan, for more than 10 years.

Lastly, there are currently two partnership specialists assigned to Puerto Rico as part of the Community Partnership and Engagement Program (CPEP). We have hired 44 partnership specialists nationally, and plan to hire more than 1,000 specialists. As part of that effort, additional partnership specialists, will be assigned to Puerto Rico. Partnership specialists are actively conducting outreach with the media, private sector entities, local governments, and nonprofit organizations that are interested in distributing our messages in Puerto Rico at the grassroots level. CPEP's main objective is to engage community partners who connect with their audiences and networks to increase participation in the 2020 Census, focusing on those who are less likely to respond or are often missed. These partners are the trusted voices in their communities who educate the public that the census is safe and important. CPEP aims to implement strong partnership relationships in Puerto Rico for the 2020 Census.

b. Conduct specific research into messaging about the citizenship question for AIAN communities.

Recommendation accepted. We have specific CBAMS information from the focus groups conducted with AIAN communities, and we are currently analyzing these data. We will continue working with AIAN groups and exploring messaging on issues related to this community.

c. Create messaging for AIAN communities that takes into consideration cultural, linguistic, and geographical differences among tribes. Ensure that this messaging includes concerns regarding validity and usefulness of Census data for tribes.

Recommendation accepted. G&G Advertising, an American Indian owned and operated agency, is part of Team Y&R and has extensive experience creating messaging for the AIAN community. G&G was involved with creating messaging for the AIAN community for the 2000 and 2010 censuses. Messaging for the AIAN community will take into consideration the cultural, linguistic, and geographical differences among tribes.

d. Conduct focus groups both before message testing and during the messaging testing phase that are made up of people living in complex families from hard to count communities. Use community partners to help get participants who are most likely not to include young children in their Census responses.

Recommendation accepted. We plan to conduct focus groups that are comprised of people living in complex families from hard-to-count communities as part of creative message testing.

e. Focus on simple, easy-to-understand messaging tools that will be easy to translate and to use for verbal communications efforts.

Recommendation accepted. These considerations are part of our plans.

6. *Partnerships*

a. Meet with trusted Census partners to ensure they have the tools they need to be confident in supporting Get Out the Count efforts. Needed tools may include public statements from Census Bureau, ICE, Department of Justice, and other agencies that no personally identifiable information will be shared between federal agencies.

Recommendation accepted. Our partnership program includes 44 specialists (with 80 additional partnership specialists joining the agency this summer) working on local partnerships and a team focused on national partnerships. That group is already meeting with partners to understand what they need and how they can help reach a variety of audiences to motivate 2020 Census response.

b. Do not assume that current Census partners will be willing to continue their association with the Census Bureau through the 2020 Census given the recent politicization of the Census.

We appreciate this feedback and recognize that partners have concerns. Partners are essential to a complete and accurate count. We look forward to continuing

collaborating with and assuring our valuable partners that their role remains vital and that the Census Bureau remains an apolitical, statistical organization. We also appreciate any assistance that the NAC can provide.

c. Partner with Departments of Vital Statistics and other state and local agencies to ensure that young children are included in the Census count.

Recommendation accepted. We are working with a variety of state agencies and private partners focused on the undercount of young children to ensure children of all ages are counted. Internally, we have improved our enumerator training materials to emphasize the importance of including children during interviews with nonresponding households. We changed the wording of a question on the census form to help those responding on behalf of their household to include children and babies. We have added the term "grandchild" and tested prompts to list unrelated children. This new wording was tested in the 2018 Census Test. We are also working on a local level. National organizations that focus on children are connecting us with local communities through pediatrician groups and advocacy organizations focused on local children. Together, we are getting the word out about counting all children.

d. Partner with Fair Housing Agencies to help ensure that there is adequate outreach to people experiencing homelessness and housing instability.

Recommendation accepted. Our Service-Based Enumeration operation and our partnership program work with external groups to reach as many people as possible who are experiencing homelessness and housing instability.

e. Provide a "how to guide" for convening Complete Count Committees and understanding GOTC timelines so that community organizations can best create organizing and outreach plans for Get Out the Count in their area and secure funding for those activities that will supplement the Bureau's GOTC efforts. Make those tools available as soon as possible, and no later than October 2018, so that community partners can use the tools to secure funding.

Recommendation accepted. The Census Bureau recently released a 2020 Census CCC Guide and a 2020 Census CCC Training Manual for partnering organizations that include recommended time lines for when certain activities should take place in their communities. Both guides can be accessed at https://www.census.gov/programs-surveys/decennial-census/2020-census/complete_count.html.

f. Ensure that community partners and funders have access to tools to help in understanding who the hardest to count people are in a state or other geographic area so that they can best allocate resources to community organizations based on the needs of the community.

Recommendation accepted. The Census Bureau has developed a tool called the Response Outreach Area Mapper (ROAM). The ROAM is an interactive web mapping application that allows partners to access the Census Bureau's Planning Database (PDB) to determine tract areas that are harder to count. The PDB includes the Low Response Score, 2010 Census data, and select ACS estimates. The Census Bureau has developed CCC training for partnering organizations which includes examples and hands-on exercises on how CCCs can use ROAM. The Census Bureau will continue working with partners to assess the tools they need. ROAM can be accessed at www.census.gov/roam.

7. *Interagency Activities*

   a. Use relationships with agencies like ICE and the Department of Justice to secure public commitments that no requests for personally identifiable Census data will be made at any time.

   The Census Bureau appreciates this recommendation. We are working with DOC to disseminate 2020 Census confidentiality messaging to other federal agencies. The Census Bureau cannot disclose identifiable data for enforcement purposes. The law is clear – the answers a person provides on a census form may not be used for law enforcement or any other purpose that would reveal individual's identity or how they responded to a question. Anyone who handles Census Bureau data swears an oath to keep those data confidential for life. Under Title 13, using census responses for any other reason than to produce population statistics is punishable by fines and up to five years in prison.

Section VIII: Undercount of Young Children Working Group

1. NAC recommends that there be additional focus groups made up of individuals living in complex families from those communities where there is a repeated pattern of undercounting young children to provide sufficiently robust data to inform an effective communications plan. Local partners trusted in those communities could potentially help organize such groups.

   Recommendation accepted. We are planning to conduct focus groups comprised of individuals living in complex families from hard to count communities as part of creative message testing. Our Communications Research and Analytics Team and our National Partnership Program Team are working together to facilitate partners' assistance in organizing such groups.

2. If and when the ROAM is updated, for the purpose of providing fuller, easily accessible information by census tract and block, NAC recommends adding the following to the list of data that is provided:

a. Child poverty rate

b. Uninsurance rate of children

c. Uninsurance rate of 18-64

d. 3 and 4 year olds enrolled in (pre)school

e. Percent of families with young children that are married couple families

The U.S. Census Bureau accepts this recommendation, provided that the ACS 5-year estimates available for the 2019 Planning Database (PDB) production cycle support the desired variables. ROAM is sourced directly from the PDB and relies on the PDB data for variables to add into the application. The detailed variables requested above may not produce reliable estimates at the census tract level. Variables that do not produce reliable estimates will not be included in the 2019 PDB. The variables requested that do produce reliable estimates will be added to the 2019 PDB and the ROAM. The 2018 PDB released in June 2018 does not include the source data necessary to include the variables listed in the ROAM this calendar year. The 2019 PDB is scheduled to be released in Quarter 3 (April-June) of FY 2019. The next major release of ROAM would be shortly after the 2019 PDB is made available and will be updated to include the appropriate variables related to children that are added to the 2019 PDB. The 2013-2017 ACS 5-year estimates will be pulled into the 2019 PDB. Please note that ROAM currently displays data at the census tract level.

3. NAC recommends the Census Bureau solicit recommendations from child data experts (Kids Count grantees, National Neighborhood Indicators Partnership members), child policy and advocacy organizations that have state and community affiliates (Partnership for America's Children, Children's Leadership Council), and others with particular foci on young children (ECCS grantees, foundations developing birth-to-five and birth-to-three initiatives) on resources that can be provided to state and community groups to use collect, analyze, and present data to identify neighborhoods (using zip code, tract, or block level information) of special focus for reducing the undercount of young children.

   Recommendation accepted. The Census Bureau is already working closely with these groups to address the undercount of young children. We are building partnerships, sharing and disseminating messaging, conducting outreach and working together to identify what tools are needed to address the undercount of young children in 2020. We look forward to continuing these engagements.

Section IX: General Recommendations

NAC Staffing and Meetings

1. NAC recommends the Census Bureau consider increased NAC meetings, briefings, webinars and timely updates on 2020 Census developments, including: ICC developments, Bureau's response to the citizenship question FRN, introduction to new NAC members, etc.

The Census Bureau accepts the recommendation and will explore the possibility of additional virtual meetings, as topics demand.

2. NAC recommends that the Census Bureau fully staff the Advisory Committee Branch to ensure its ability to respond to increased 2020 Census advisory needs for NAC and CSAC due to decennial ramp-up.

   The Census Bureau appreciates the recommendation. We are working within our resources to continue to fully support the NAC.

3. NAC recommends that replacements for the 6 retiring members of the NAC should represent the interests of those rolling off, including the disability rights, privacy protection, and Arab American communities.

   The Census Bureau appreciates this recommendation. We always strive for a National Advisory Committee that reflects the country's diversity.

4. That the NAC create a working group on Census data confidentiality protections to: a) understand fully existing statutory protections and their practical implementation and enforcement; b) propose appropriate Census Bureau communications and partnerships to increase public confidence in the efficacy of existing protections; and c) consider appropriate augmentation of existing protections that the Census Bureau could implement, support, and/or communicate to increase public confidence in the confidentiality of Census data.

   The Census Bureau supports the recommendation and will look into standing up the working group. By way of background, the Census Bureau has already been exploring this topic. Over the past two years, the CSM has conducted remote and in-person qualitative evaluations of all legal- and policy-required respondent messaging about privacy and confidentiality. This research was designed to explore various ways of communicating the required description of access to data collected under Title 13, as well as other language required by the Paperwork Reduction Act (PRA). The team synthesized the findings from these research efforts and, after consultation with Census Bureau's Policy and Legal Offices, issued required modifications to the Census Bureau's confidentiality and PRA-required language. These updates will allow more standardized and optimized messaging from the Census Bureau to the public on privacy and confidentiality. CSM has also tested many of the FAQ and talking points surrounding privacy and confidentiality for both the Policy and Public Information Offices. CSM maintains the capacity to quickly qualitatively or quantitatively pretest any modifications to the required language or other messaging surrounding privacy and confidentiality.

5. That the NAC create a working group on Census Bureau hiring and recruitment of staff for Census 2020 to: a) assess the efficacy of existing recruitment and hiring practices,

especially with respect to hard-to-count populations in need of culturally-competent Census Bureau field staff to achieve higher levels of Census response; b) assess the fairness of existing recruitment and hiring practices, including the specific application and use or non-use of written or oral assessments, with respect to race/ethnicity, gender, age, disability, and other characteristics, including assessing the need for reasonable accommodations; and c) recommend changes, adjustments, or augmentations to recruitment and hiring practices to address efficacy and fairness concerns.

a. *Statement*: The decision of the OMB regarding data collection on race and ethnicity. As a result the Afro-descendant (black population in the US) continues to be placed in various regional boxes in which they are not counted as blacks, and some are even counted as white as is the case of the black MENA communities and black Hispanics (Afro-Latinos), for example. This results in significant undermining of the Census Bureau's ability to achieve an accurate counting of the black population in the country and thus its ability to have accurate numbers in the 2020 Census as a whole because of the flaws of the current category system.

b. *Statement*: In the UN-proclaimed "International Decade of Peoples of African Descent: Recognition, Justice and Development 2015-2024" we see the following:

- Recognition: No full recognition of black race for Afro-Latinos, and some people—black Egyptians, for example, are counted as white;
- How can we receive equal access to justice without proper recognition? The judicial system treats all blacks equal, even if the Census Bureau counts them as white.
- How can we be included on an equal basis in the development process without recognition and proper access to justice? We miss out in access to investment, other resources and appropriate representation. As a result our communities are consistently left out or behind other populations in the development process.

The Census Bureau accepts the recommendation and looks forward to working with the NAC on recruiting and hiring as we move to the 2020 Census.

Section X: Requests for Information

1. Copy of AIAN partnership plan that has been developed.

   The Census Bureau currently is developing the tribal partnership plan. We expect to complete the plan early in the fall. As soon as the plan is completed, we will share with the Committee and present on this topic at the fall meeting.

2. Please share the efforts of the NAC reports to the communications leads so they can be aware of the efforts, including hard to count & undercount of young children.

   Recommendation accepted. The Census Bureau shares all of the NAC reports and recommendations with the communications team.

3. Section 2018 Test - Provide current 2018 Census Test Response Rates by race and Hispanic origin and mode to NAC, immediately, and final response rates once this information is calculated.

   As of July 3, 2018, the self-response rate for the 2018 Census Test is 52.5 percent, with 32.1 percent internet response, 16.5 percent paper response, and 3.9 percent telephone response. We cannot yet provide response by demographic groups, such as race or Hispanic origin. This type of breakdown requires data collection to be complete, providing a final housing unit status for each unit. After data collection ends and the post processing of the data is complete, we can produce "return rates" that reflect the self-response percentage out of all occupied households. The Census Bureau plans to release final response rates, final return rates, and final return rates for demographic groups, and we will share these results with the NAC.

4. Is there a breakdown of the % of the CPEP budget directed to different racial & ethnic groups? It was just said that 50% of the budget in 2010 targeted English language outreach BUT within that 50%, what proportions targeted hard to reach populations?

   No such information exists. In the past, this [percentage?] is not something that has been predefined. As time passes, we may have additional information about expenditures for the Committee, but at the moment there are not any pre-established targets.

5. Provide webinar on how to access and make use of ROAM to NAC members and community partners.

   Recommendation accepted. The Census Bureau will work with the NAC to plan a ROAM webinar.

   As part of the NAC Engagement plan, the Census Bureau is planning a 5-part Webinar Series (one-way briefings). The first of these will be on the Response Outreach Area Mapper (ROAM). It is tentatively scheduled for July or August, 2018. This webinar will be recorded and the ROAM staff are coordinating with the Community Partnership Staff in FLD make it widely available to local partners e.g. via the 2020 Census Partnership Website portal (https://www.census.gov/partners/).

6. Given the importance of 2020 Census recruitment and hiring and the large number of prospective candidates the Bureau must recruit (1.5 million?) to hire approximately 500,000 FLD enumerators. Please provide NAC an opportunity to review 2020 Census

recruitment messaging and advertisement materials prior to completion to ensure materials appeal to diverse candidates.

Advertising materials for 2020 Census recruitment are being developed under the Census Bureau's Integrated Communications Campaign (ICC) contract, which was awarded to Young and Rubicam (Y&R). As part of the contract, Y&R is obligated to subcontract with multicultural partners that are focused on ensuring materials are appropriate for a diverse pool of candidates. The Census Bureau is currently under strict deadlines with very short review periods for these materials and must rely on the multicultural partners to assist us with review. We appreciate the Committee's expertise and advice and we will be happy to share final products with NAC, when they are available. Please note that the NAC charter does not provide for an approval role for the Committee.

Section XI: Future Meeting Topics

1. Request the IPC be a standing report/presentation at NAC meeting through implementation of the 2020 Census with emphasis on HTC efforts/populations.

   Recommendation accepted. We would be pleased to regularly update the Committee on the IPC operation and discuss our hard-to-count efforts.

2010 COMMUNICATIONS CONTRACT MEDIA PLANNING BUDGET

Census 2000 and 2010 Census

Program Component	Census 2000 Contract Cost (Actual)	**Census 2000 Contract Cost Inflated to 2010	2010 Census Estimated Lifecycle Allocation (Base and ARRA)	*Index vs. 2000	2010 Rapid Response Activities (Base and ARRA)	TOTAL ESTIMATED LIFECYCLE BUDGET	*Index vs. 2000
National Buys (All audiences)	$ 57,916,000	$ 84,441,528	$ 75,570,160	130	$ 14,599,055	$ 90,169,215	156
Local Buys (Mostly directed to HTC population)	$ 52,102,000	$ 75,964,716	$ 59,615,457	114	$ 17,340,927	$ 76,956,384	148
Diverse Mass***	$ 57,916,000	$ 84,441,528	$ 64,442,095	111	$ 17,198,375	$ 81,640,470	141
Ethnic/Language Audience	$ 52,102,000	$ 75,964,716	$ 70,743,522	136	$ 14,741,607	$ 85,485,129	164
Hispanic	$ 18,886,000	$ 27,535,788	$ 25,297,664	134	$ 7,440,524	$ 32,738,188	173
Black (including African and Caribbean)	$ 17,021,000	$ 24,816,618	$ 22,779,681	134	$ 5,608,161	$ 28,387,842	167
Asian	$ 10,016,000	$ 14,603,328	$ 12,928,880	129	$ 1,235,770	$ 14,164,650	141
Native Hawaiian & Pacific Islanders	$ 147,000	$ 214,326	$ 1,105,036	752	$ 24,900	$ 1,129,936	769
American Indian/Alaska Native	$ 2,804,000	$ 4,088,232	$ 3,892,787	139	$ 194,494	$ 4,087,281	146
Emerging Audiences	$ 1,508,000	$ 2,198,664	$ 1,778,119	118	$ 103,641	$ 1,881,760	125
Puerto Rico	$ 1,298,000	$ 1,892,484	$ 2,397,000	185	$ 47,000	$ 2,444,000	188
Island Areas	$ 422,000	$ 615,276	$ -	N/A	$ -	$ -	N/A
New Legacy languages	N/A	N/A	$ 564,355	N/A	$ 87,117	$ 651,472	N/A
Total Advertising Buy	**$ 110,018,000**	**160,406,244**	**$ 135,185,617**	**123**	**$ 31,939,982**	**$ 167,125,599**	**152**

* Comparison between Census 2000 Contract Cost (Actual) to 2010 Census Estimated Lifecycle Allocation and Total Estimated Lifecycle Budget.
** The inflation rate for paid media varies from year to year. This represents an average of the last 10 years.
*** In Census 2000, the national buy was equivalent to the "Diverse Mass" audience of 2010.