



November 3, 2023

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Dear Associate Director Stempowski,

We are writing to express both appreciation and concern about the Census Bureau's recently released 2030 Census Research Agenda.¹ We very much appreciate that Decennial leadership took time to reach out to stakeholders to present the highlights and to commit to receiving feedback before the 2030 Census Research Agenda is finalized. Additionally, the website presents in thematic and easily navigable chunks what would otherwise have been a very long document.

That said, we have significant concerns with the 2030 Census Research Agenda. Many of us are on record saying the American people are indebted to the career staff of the Census Bureau who carried out our 23rd decennial enumeration under unprecedented challenges. But the "enhanced 2020" approach described will not be adequate for meeting the Census Bureau's commitment to "producing data that depict an accurate portrait of America, including its underserved communities."

The challenges encountered in overcoming differential undercounts of marginalized populations including people of color, language minorities, noncitizens, rural residents, as well as Americans without broadband access and with lower educational attainment continue and trends indicate some are increasing. Coupled with across-the-board nationwide declines in survey response, a growing housing crisis, and increasing distrust of government, what is needed now is a bold 2030 Census Research Agenda designed to provide a genuinely novel approach to Census Bureau data collection. In short, the Bureau will need to tackle 2030 with groundbreaking new research and procedures to produce an accurate count of an increasingly diverse and skeptical U.S. population in 2030.

1. Addressing All Persistently Undercounted Populations

As researchers, statisticians, and stakeholders, our professional judgment is that the persistent differential undercounts of people of color, language minorities, noncitizens, rural residents, and renters, which are also reflected in the undercounts of very young children, and the dramatically lower response rates in low-income communities, from respondents with lower educational attainment, and households without broadband access, are the cluster of issues in greatest

¹ 2030 Census Research Project Explorer. U.S. Census Bureau. <https://www.census.gov/data/data-tools/decennial/2030-census-research-explorer/>.

need of attention in the decennial program.² So we are concerned to see that while two research projects focus on the undercount of children, none address the differential undercounts of any other persistently undercounted group.

Evidence

The need for explicit action-oriented applied research to address all persistently undercounted populations is clear. We need only look at tripling of the undercount of people of Hispanic origin in 2020, the most serious undercount of the American Indian and Alaska Native population in recent decades, and persistence of the differential undercount of Black people, and an overcount of Asian-Americans shown to be misleading in the aggregate. Moreover, the PES design in 2020 did not even seek to assess the differential undercount gap between rural and urban communities even though the undercount of rural areas has been documented since 1960s and earlier.

Moreover, in the leadup to 2020, the Bureau devoted extensive research and resources to the undercount of children, and yet the 2020 Census resulted in the highest undercount of young children since 1970. As a matter of simple demography and math, we submit that this undercount will persist and even grow until the Census Bureau successfully addresses the undercount of people of color more broadly, given that the majority of children in the U.S. today are non-white.

Structural barriers to self-response and successful NRFU are arguably more important to address than motivation. A recent analysis by O'Hare and Lee, for example, shows that multiple factors including educational attainment of a high school diploma or less (an indicator of low literacy skills), crowded housing (likely complex households), and a recent move are associated with lower levels of self-response.³ Some of the structural barriers that affected the 2020 Census include:

- Addresses not on the Master Address File
- Multiple households at a single address receiving only one census form or ID
- No internet access
- Low literacy level and/or low digital literacy skills
- Limited English

² Low self-response is highly predictive of not being counted at all regardless of NRFU. The 2020 PES showed that there was a statistically significant undercount of the 20% of census tracts with the lowest level of self-response. Courtney Hill, Krista Heim, Jinhee Hong, and Nam Phan, U.S. Census Bureau, 2020 Post-Enumeration Survey Estimation Report, PES20-G-02RV, *Census Coverage Estimates for People in the United States by State and Census Operations*, U.S. Government Publishing Office, Washington, DC, June 2022

³ O'Hare, William P., and Jae June J. Lee. "Who Responded in the 2020 Census? Variation in Tract- Level Self-Response Rates in the 2020 U.S. Census." Georgetown Center on Poverty and Inequality, 2021. Available at www.georgetownpoverty.org/issues/who-responded-in-the-2020-census.

Beware of equity-efficiency tradeoffs

An equitable census would be an accurate census with no differential under or overcounts—one which counts all groups accurately (and thus contributes to the accurate distribution of representation and resources as intended to people of color, rural residents, renters, and children). Economists point to an equity-efficiency trade-off which can occur when activities are focused primarily on economic efficiency.

The Bureau successfully cut the rate of growth in cost per household of the 2020 Census to 7.4% over 2010 – compared to growth of 15 percent in 2010.¹ Many of the efficiencies that the Census implemented for the first time in 2020 contributed to this cost containment, but may also have contributed to the continued, and in some cases worsened, differential undercount of persistently undercounted populations. Examples of possible equity-efficiency trade-offs in the 2020 Census appear in Appendix A.

Recommendation

We recommend the Census Bureau establish a research project focusing on the undercount of all persistently undercounted populations. This research project should begin immediately in FY24 with a modest investment in observational research built on the affordable ethnographic research conducted in 1990. That research initiative examined causes of undercount in 31 distinct communities.⁴ We suggest research sites in 2024 be chosen to represent diverse populations in diverse built environments (housing/living patterns, urban/rural, level of broadband connectivity). Such research could then inform “localized” operations and messaging to be tested in multiple 2026 field tests. This research should include particular emphasis on those with low literacy and/or low digital literacy and language minorities to identify modes by which they prefer to provide information to the government. This research should also aim to surface issues around distrust of government and how the Census Bureau might overcome this distrust.

Observational research (such as inexpensive ethnographic research) is key to understanding challenges to census participation. Surveys and focus groups (including CBAMS) are not sufficient to gather all of the comprehensive and accurate information about barriers that individuals may face regarding census completion (such as low-literacy or low-digital literacy, or lack of an address on the MAF.)

2. Improving Master Address File (MAF) Quality and Completeness

The quality and completeness of the MAF and processes for MAF-building are extremely important because they affect both completeness of data collection and subsequent assessment of data quality in the PES.

⁴ De La Puente M. Using Ethnography to Explain Why People are Missed or Erroneously Included by the Census: The Evidence from Small Area Ethnographic Studies, Center for Survey Methods Research, U.S. Census Bureau <https://www.census.gov/library/working-papers/1995/adrm/sm95-16.html>.

Evidence

An in-depth evaluation of LUCA for the 2010 decennial census showed that the program generated only limited local government participation and that the quality of locally generated address data varied.⁵ Most LUCA submissions have been based on local databases of administrative records many of which have the same shortcomings the USPS file has. In addition, a frequent problem with LUCA has been de-duplication which is time-consuming, costly, and error prone. Going forward, it should be expected that local government ability to generate high-quality LUCA data will become more uneven due to growing disparities in local fiscal and technological capacity with rural areas increasingly falling behind the largest urban areas.⁶ Targeted community-based address canvassing has been shown to be affordable and effective and may generate cost-savings over LUCA which is costly and error-prone.

Recommendation

We recommend the Bureau establish a research project no later than 2024 that examines whether well-targeted in-field (street level) address canvassing can not only identify low-visibility housing units not in the MAF but, also, areas with concentrations of complex households. These efforts could be guided by a model to be developed by the Census Bureau that targets areas where addresses were missed in 2020 as identified by the Real-Time 2020 Administrative Record Census Simulation⁷ and metrics that suggest a likely concentration of complex households.⁸

3. Improving Instruments Design

Improving enumeration of persistently undercounted groups will require bold strategies to facilitate low-barrier alternatives to online response for households without broadband connectivity, with low literacy levels and/or limited digital literacy skills, or limited-English.

Evidence

The 2022 ACS found that 6% of American households have no internet access at all and another 11% have cellular service only. Communities that lack internet are likely clustered in low-income or rural areas. (As just one example, 22% of households in rural Calhoun County, FL have no internet access and another 21% have cellular only.) We are pleased to see that improvements in non-ID response data collection procedures are on the 2030 Census Research Agenda (EA 1.1-- Improving Internet Self-Response and Non-ID Data Collection) but concerned

⁵ Swartz R, Virgile P, Timko B. 2010 Census Local Update of Census Addresses Assessment: Final Report, Geography Division, U.S. Census Bureau. 2012

⁶ "Rural Capacity Map." Headwaters Economics, June 8, 2023. <https://headwaterseconomics.org/equity/rural-capacity-map/>.

⁷ Real-Time 2020 Administrative Record Census Simulation. U.S. Census Bureau. May 5, 2023. <https://www.census.gov/programs-surveys/decennial-census/decade/2020/planning-management/evaluate/eae/2020-admin-record-census-simulation.html>.

⁸ Including doubled-up and dynamic households. Census Bureau research led by Laurie Schwede has provided very useful insights, but there remain many key areas where not enough is known. For example, there is not, to our knowledge, any comprehensive research on the prevalence of doubled-up households in different geographic areas or among different ethnic/socioeconomic subpopulations. Without a solid knowledge base about prevalence and patterns and the variations in types of doubled-up household (e.g. in major urban areas vs. rural areas) it is difficult to optimize operations to assure each household (not just each housing unit) is enumerated. To provide a sound basis for subsequent detailed operational design, this research will need to focus on areas where such housing arrangements are most prevalent. National-level analysis will not suffice.

that this research focuses only on Internet Self-Response and fails to specifically address the needs of persistently undercounted populations.

Recommendation

We recommend the Bureau establish a research project to identify optimal modes of response and improved instrument design for limited-English households and those without broadband connectivity, with low literacy levels and/or limited digital literacy skills. The analytic framework for the research needs to be focused on user experience rather than on enhancement of pre-existing facets of current operational design. Kissam's 2010 field research found that less-literate respondents preferred getting help from friends or extended family rather than Mobile Questionnaire Assistance Centers.⁹ And the Census Bureau previously conducted low-cost ethnographic research that shed light on possible instrument improvements by examining how experienced enumerators paraphrased census form directions for limited-English respondents.¹⁰ We recommend that the Bureau build on this research to establish similar low-cost research that can reduce barriers to self-response for these populations. The innovations announced at the October 17th Census Bureau webinar (including the use of chatbots, QR codes and live webinars for questionnaire assistance) are not likely to be effective at bridging the digital divide. Census should research the potential impact on equity of these modes.

4. Identifying and Empowering Trusted Voices

Trusted voices outside of government are increasingly important for encouraging census response as trust in government deteriorates. Identifying the most effective approaches to engage trusted leaders in marginalized communities and optimally mobilize local social networks will be a critical component in overcoming differential undercounts.

Evidence

Research by Terry et al (2023) found that Community Based Organizations (CBOs) are critical for overcoming distrust of the Census, but CBOs are already stretched thin.¹¹ The Bureau relies heavily on thousands of community partners, few of whom receive compensation for promoting the census. In 2020, the Census Bureau had a goal of recruiting 300,000 community partners, up from 256,000 in 2010. And by the end of February 2020, the Bureau's Partnership Specialists documented more than 307,000 community partners.¹² But how effective were these community partners, what messaging and outreach activities did they undertake, and what is the evidence about the efficacy of different types of efforts to promote census self-response?

Recommendation

⁹Kissam E. Census Enumeration of Immigrant Communities in California: Dramatic Improvements but Challenges Remain. Report to The California Endowment, JBS International, September, 2010.

¹⁰ Christina Isabelli, Yuling Pan, and Stephen Luberkerman, "Observing Census Enumeration of Non-English Speaking Households in the 2010 Census: Spanish Report", *Survey Methodology Report #2012-06*, Census Bureau, 2012. Parallel studies were conducted for other languages.

¹¹ Terry et al, 2023, Qualitative Insights on Barriers to 2020 Census Participation for Some Populations, AAPOR Conference

¹² <https://www.gao.gov/products/gao-20-496>. In addition, anecdotal evidence from Partnership Specialists (after their temporary employment ended) revealed that the requirement to enter information about community partners in a Census Bureau database was extremely time-consuming, took away from important outreach and relationship building activities, and was devoid of utility for the Partnership Specialists themselves.

We recommend the Bureau develop a research project that aims to identify the strengths and weaknesses of the 2020 Census partners. The current research project entitled “Enhance External Engagement” which aims to explore how the Bureau can “equip stakeholders to increase their capacity, identify gaps, and leverage networks” specifically identifying convening as an approach that will be tested to “determine structures, systems, capacities, and tools needed to conduct a better enumeration of the U.S. population” represents a re-testing and refining of a longstanding operational component of unknown effectiveness. Instead, research is needed on the extent to which the community outreach partners actually reached households that were less inclined to self-respond, and how persuasive messages were developed for sub-population. Research in the San Joaquin Valley suggests that low-cost qualitative research can yield actionable insights on this important topic.¹³ Such research could then serve as an information base for designing and providing technical assistance to external partners to ensure they are effective.

Funding for GOTC efforts is very unevenly available across states and localities, and the current 2030 Census Research Agenda reveals a 2030 Census plan that would place too heavy a reliance on groups that may have no funding to support GOTC efforts. The Bureau or Commerce Department should consider providing matching funding to states and localities for GOTC efforts to ensure that each state and locality has a fighting chance at supporting a full count.

Finally, we recommend the Bureau develop a research project that rigorously evaluates its 2020 Census Communications Campaign. The strategic challenge for media efforts to promote self-response (and response during NRFU) is that the distribution of persistently undercounted populations is not the distribution of mainstream media and social media have limitations in reaching audiences without broadband connectivity and/or less connected to generic social media.¹⁴ It’s reasonable to hypothesize that any mass media campaign will be ineffective at motivating self-response among persistently undercounted populations. A research project that rigorously quantifies the contribution of the 2020 Census Communications Campaign is needed evidence for minimizing this costly initiative.

5. Evaluating Success Metrics

While the 2030 Census Research Agenda includes a project to research the feasibility of disseminating and utilizing real time “Integrated Performance Analytics” this project fails to critically examine the impact of current success metrics.

Recommendation

We recommend that the Bureau develop a research project that critically reexamines its current set of success metrics and identifies metrics that can assess progress toward truly counting “everyone once, only once, and in the right place.” For example:

¹³ A recent quantitative analysis of California’s vigorous “Get Out The Count” program in a multi-county region showed positive impacts but that impact varied greatly from community to community. Much more needs to be learned about the factors affecting outreach efficacy. See Joanna Lee and Jennifer Ito, “Census 2020 in the San Joaquin Valley: An Empirical Assessment of Strategies to Activate Populations That Have Been Historically Undercounted”, April, 2023, USC Dornsife Equity Research Institute. https://www.shfcenter.org/wp-content/uploads/2023/05/Census_2020_in_the_San_Joaquin_Valley_April_2023.pdf

¹⁴ Pew Research Center, “Social Media Fact Sheet”, April, 2021 <https://www.pewresearch.org/internet/fact-sheet/social-media/?tabId=tab-f13a8cb6-8e2c-480d-9935-5f4d9138d5c4>

- Total Percent Net Coverage Error, which is a measure of accuracy of only one data point – the total population of the nation -- does not indicate anything about the success of the census to count everyone once, only once, and in the right place. Instead, it measures the opposite, the extent to which omissions were offset by imputations and duplications in regard to the national total population. This metric should be eliminated as a measure of success of the 2030 Census.
- In 2020, the Census Bureau touted a 99.98 percent accounting of all addresses. But “accounting” simply means that a nonparticipating household or address was brought to final disposition according to field protocol. Certainly “accounting” does not indicate anything about the quality of the final disposition of the address, or even the completeness of the MAF and as such is not a good measure of success.
- Analyses of coverage should include more detail on coverage for diverse sub-populations, including ethnic groups within each major race category. In particular, more fine-grained geographic detail is needed on patterns of coverage and the relationship between undercount and self-response and operational data on NRFU at the sub-county level.

6. Targeting Administrative Records Acquisition and Assessment

Dramatically declining response rates are pushing many peer countries to assess new data sources for their potential to improve census coverage and quality. While a number of projects included in the 2030 Census Research Agenda include assessments of the utility of administrative records, these projects primarily only update methods used in 2020 rather than exploring the utility of a wider variety of additional data sources. The creation of Demographic Frame¹⁵ and the Continuous Count Study¹⁶ are important steps toward leveraging a wider variety of data to account for households missed in the decennial census.

Recommendation

We recommend the Bureau develop a research project focused specifically on state-level data sets including WIC, TANF, Medicaid and CHIP to assess their utility for improving census coverage of persistently undercounted populations. This project should include all the practical questions entailed in securing these datasets including how much time it would take to reach agreements to access them.

Separately, the Census Bureau should make clear how the Continuous Count study will leverage the learnings from the impressive Real-Time 2020 Administrative Record Census Simulation to improve decennial census coverage and quality.¹⁷

Summary

In summary, with the end goal of eliminating differential undercounts in 2030, we recommend some specific ways by which affordable mixed-methods research can greatly enhance the

¹⁵ <https://www.census.gov/content/dam/Census/newsroom/press-kits/2023/jsm/20230807-jsm-presentation-demo-frame-2030-census.pdf>

¹⁶ <https://www2.census.gov/about/partners/cac/sac/meetings/2023-09/presentation-continuous-count-study.pdf>

¹⁷ These include the paper on an experimental AR-based census <https://www.census.gov/programs-surveys/decennial-census/decade/2020/planning-management/evaluate/eae/2020-admin-record-census-simulation.html>, the paper on non-citizen coverage and population statistics <https://www2.census.gov/library/working-papers/2023/adrm/ces/CES-WP-23-42.pdf>

Census Bureau's understanding of barriers, attitudes, and motivations around census response, how targeted research on administrative records may yield data sources that increase coverage of persistently undercounted populations, and how success metrics can be critically reexamined.

We appreciate the Census Bureau's dedication to accurately enumerating the United States population to ensure fair distribution of representation and resources. We look forward to continued engagement around the 2030 Census Research Agenda in service of a 2030 Census that accounts for the whole number of persons in our diverse nation.

Sincerely,

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The Data Center of Southeast Louisiana
Census Quality Reinforcement Task Force Co-Chair

Cara Brumfield, Director of Income and Work Supports,
Center for Law and Social Policy (CLASP)
Census Quality Reinforcement Task Force Co-Chair

[Organizations]

National Urban League

NAACP

Population Association of America

Association of Public Data Users (APDU)

Association of Population Centers

Coalition on Human Needs

Arab American Institute (AAI)

Center for Law and Social Policy (CLASP)

Georgetown Center on Poverty & Inequality

Prison Policy Initiative

Asian and Pacific Islander American Vote (APIAVote)

Fair Count

SocialExplorer, Inc.

Texas Census Institute

Connecticut Data Collaborative

Central Valley Immigrant Integration Collaborative

MACS 2030 - Minnesotans for the ACS and 2030 Census

Twin Cities Research Group

NC Counts Coalition

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APPENDIX A

Examples of Possible Equity-Efficiency Trade-offs in the 2020 Census

The Real-Time 2020 Administrative Record Census Simulation found that “About 14.4 million administrative record people are observed at 9.8 million addresses outside the 2020 Census collection universe, and another 8.7 million are at addresses not linked to the MAF” suggesting that the Bureau’s method of address canvassing failed to capture millions of addresses.¹⁸ While satellite imagery was credited with more efficiently completing the needed 2020 address canvassing, it was not well-suited to identifying some quite common types of low-visibility housing units such as rented basements in urban areas and rented garages and backyard trailers in suburban and ex-urban low-income neighborhoods.

The 2020 Census NRFU operation used automated case assignment methodologies to increase efficiency. But anecdotal evidence from enumerators revealed that many were re-assigned to neighborhoods they did not know. Yet research is clear that enumerators are most effective in overcoming distrust when they are assigned to the neighborhoods in which they live and are known.

The highly touted phone-in response option in 2020 did not facilitate self-response via phone but instead pushed callers to respond online and presented significant barriers to anyone who attempted to respond via phone. Ultimately only 1.39% of all household self-responded via phone¹⁹— a technology that is widely available and usable even for individuals with low digital literacy. While this push-toward-online approach may have saved human resource costs in call centers, how many self-responses did the Bureau fail to receive because the phone-in option presented barriers to responding via phone?

Recent analyses indicate that introduction of online response was highly-cost effective but that it increased disparities in enumeration by broadening the self-response gap between tracts with high levels of broadband connectivity and those without.²⁰ In particular, it appears to have broadened the rural-urban divide in self-response and may have also broadened the differential undercount of race/ethnic minorities due to disparities in broadband connectivity.

¹⁸ <https://www.census.gov/content/dam/Census/newsroom/press-kits/2023/jsm/20230807-jsm-presentation-demo-frame-2030-census.pdf>

¹⁹ 2020 Census Data Quality, May 1, 2023. <https://www.census.gov/programs-surveys/decennial-census/decade/2020/planning-management/process/data-quality.html>.

²⁰ J. Gregory Robinson, Ed Kissam, and William O'Hare, “Hard-to-Count Scores and Patterns of 2020 Census Response Rates: A Case Study of California”, paper prepared for the AAPOR Annual Conference, Panel A on the Census, May 10, 2023