

**Public Comments Received on Federal Register notice 79 FR 71377:  
Proposed Information Collection; Comment Request; 2015 National Content Test  
U.S. Census Bureau; Department of Commerce  
December 2, 2014 – February 2, 2015**

**Comments** (written verbatim, with personal information redacted)

Thank you for the opportunity to comment on the question content for the 2020 Census Hispanic Origin and Race Question. As a sociologist of racial, ethnic and gender stratification, I have a lifelong interest in these questions. Has any of the question format testing been done to assess the impact on the ability to track social outcomes in housing segregation or any other Civil Rights measures? I have attached a bibliography and one article and one chapter I wrote that detail the importance of maintaining two separate questions format on Hispanic origin and race for interrogating inequalities in Civil Rights outcomes including residential segregation, voting redistricting, as well as education, law enforcement, employment, and education among other policy arena. I have also attached the mission for the New Mexico Statewide Race, Gender, Class Data Policy Consortium as it may be of interest to Census data staff and other users and two commentaries I wrote for the National Institute for Latin Policy on the topic.

Thank you again for your leadership in the collection of data that advances a more perfect union for all. I look forward to supporting all your efforts to invite community dialogue and promote outreach and education on the purpose of federal data collection as well as the analytical distinction between race (e.g., Master Status based on the meaning assigned to a conglomeration of physical characteristics) and ethnicity (cultural background, such as national origin, language and potentially ancestry or distant lineage).

[Multiple Submissions]

On behalf of The Leadership Conference on Civil and Human Rights, a coalition charged by its diverse membership of more than 200 national organizations to promote and protect the civil and human rights of all persons in the United States, we appreciate this opportunity to provide comments in response to the Department of Commerce's Request for Public Comment. The Leadership Conference provides a powerful unified voice for the various constituencies of the coalition: persons of color, women, children, individuals with disabilities, gays and lesbians, older Americans, labor unions, major religious groups, civil libertarians, and human rights organizations. We are pleased to offer for the record a report from our sister organization, The Leadership Conference Education Fund, "Race and Ethnicity in the 2020 Census," which examines the potential implications of proposed revisions to the 2020 census race and ethnicity questions for continued, effective implementation, monitoring, and enforcement of civil rights protections.

The Leadership Conference views an accurate and fair census, and the collection of useful, objective data about our nation's people, housing, economy, and communities, to be among the most important civil rights issues of our day. We have a long record of first-hand experience working in support of previous censuses, and for the 2010 Census, undertook the most comprehensive and extensive effort by a stakeholder organization to promote participation in historically hard-to-count communities and to mobilize local advocates in support of a fair and accurate census by highlighting the civil rights and social justice implications and community benefits. In addition, The Leadership Conference conducts advocacy on various data-related issues, such as sufficient funding resources for the American Community Survey (ACS).

The measurement of race, ethnicity, and national origin in the census, ACS, and other bureau surveys is of particular importance to The Leadership Conference and its members. Generally, we support the collection of detailed data that illuminate the diversity within racial and ethnic groups; these data give public and private sector policymakers the tools necessary to understand and address the disparate needs of all communities. We have followed closely the 2010 Census Alternative Questionnaire Experiment Program, as well as subsequent analysis and research efforts, and want to ensure appropriate and timely opportunities for The Leadership Conference to review and comment on the development of possible revisions to the race and ethnicity questions. We also are interested in how and when the Bureau will utilize the ACS as a vehicle for testing any proposed revisions to the race and ethnicity questions and other methodological and operational changes.

While we applaud the Census Bureau for recognizing the need to reevaluate race/ethnicity questions at a time of ongoing demographic change, we also want to be sure the census and ACS continue to produce data that are useful in the implementation, enforcement, and monitoring of this nation's civil rights laws.

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The Education Fund's report, "Race and Ethnicity in the 2020 Census," is the culmination of The Leadership Conference and The Education Fund's year-long project to examine the Census Bureau's research and testing program from the perspective of civil rights stakeholders and to ensure that any revisions to the 2020 census race and ethnicity questions continue to yield data that support the advancement of fairness and equity in all facets of American life. The report describes specific uses of census race and ethnicity data for the implementation, monitoring, and enforcement of civil rights laws, regulations, and policies, in a number of important arenas. The report also outlines civil rights stakeholder goals and concerns with respect to the collection and reporting of race and ethnicity data in the next decennial census. It concludes with a set of recommendations for both the Census Bureau and OMB, encompassing suggestions for further research and testing, ways to strengthen the partnerships between these agencies and the civil rights community, and principles to guide final decision-making on this critical aspect of the 2020 census.

We stand ready to work with you to ensure that the voices of the civil and human rights community are heard in this important, ongoing national conversation. If you have any questions about these comments, please contact [redacted].

On behalf of the National Association of Latino Elected and Appointed Officials (NALEO) Educational Fund, the leading Latino organization in the area of Census policy development and public education, I would like to take this opportunity to Provide comments about the Census Bureau's 2015 National Content Test (NCT).

These comments are in response to the proposed information collection published by the Bureau on December 2, 2014 at 79 FR 71377. The NALEO Educational Fund is the nation's leading nonprofit organization that facilitates the full participation of Latinos in the American political process, from citizenship to public service. Our Board members and constituency encompass the nation's more than 6,000 Latino elected and appointed officials, and include Republicans, Democrats and Independents.

The nation's 54 million Latinos are the country's second largest population group, and one of every six of the nation's residents is Latino. Thus, in order for the Census Bureau to compile the most accurate data possible about the U.S. population, it must ensure a full and accurate count of the Latino community. While the Bureau has made progress in reducing the differential undercount of different population groups, the differential undercount of Latinos persists, and was 1.5% in Census 2010.

As the Bureau has recognized, the 2015 NCT is a crucial component of the restructuring process for the 2020 decennial Census. The Bureau's decisions about all aspects of the NCT will have a critical impact on the accuracy of the data compiled on Latinos and the nation's other racial and ethnic population groups, including the detailed data compiled on Latino national origin and sub-groups.

The NCT will evaluate several potential changes to the Bureau's enumeration approaches: the wording and format of questions on race and Hispanic origin, the optimal targeting of multilingual materials, and the feasibility of various Internet response options. Generally, we believe that any of the foregoing changes adopted by the Bureau must maintain or improve historical Latino response rates and the accuracy of the data collected. The Bureau's future research must also reflect and take into account the diversity within the Latino community, including linguistic and national origin diversity. In order to achieve these goals, the Bureau must work closely with the Latino community in carrying out the 2015 NCT, and obtain the input of Latino stakeholders who have extensive expertise in issues which affect Latino participation in the Census, Latino racial and ethnic identity, and the use of data about Latinos by the public and private sector.

In this letter, we provide recommendations regarding the different components of the NCT as well as other issues affecting the Bureau's activities which have an impact on the enumeration of the Latino community.

**I. Proposed Revisions to the Race and Ethnicity questions**

Comparability with previous Census data: We support the collection of detailed data that accurately illuminate the diversity within racial and ethnic groups; these data give public and private sector policymakers the tools necessary to understand and address the disparate needs of all communities. While we commend the Census Bureau for recognizing the need to reevaluate the race and ethnicity questions at a time of ongoing demographic change, we also want to ensure that all Census products provide data that

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are useful in the implementation, enforcement, and monitoring of this nation's civil rights laws. To that end, any revised format for the race and ethnicity questions must continue to yield, at a minimum, data about all diverse racial and ethnic communities that are compatible with and comparable to data collected during the 2010 and previous decennial Censuses.

Enhanced accuracy of national-origin and sub-group detail: For the Latino community, it is critical that any redesign of these questions does not diminish, and hopefully improves, the quality of data collected about specific Latino national origin and sub-groups. The Bureau must also ensure that testing takes into account and is able to obtain accurate information from Latinos who may choose to report multiple national origin or sub-group identifications.

Testing with Spanish-dominant residents: The Bureau should test all approaches to redesigning the questions on race and ethnicity to ensure that Spanish-dominant residents (which include a significant number of immigrants) understand the questions. This testing should also focus on gathering information about how these respondents interpret these questions, since many of them are not necessarily familiar with the terms used.

Use of clear instructions for hard-to-count communities: The question formats of the NCT should include clear instructions targeted towards hard-to-count communities which effectively communicate to respondents the purpose of the questions and what is precisely being asked. To achieve this goal, we recommend consultation with experts in linguistics and socio-culturally sensitive communications to develop instructions in multiple languages that comport with the dialects used by and reading capabilities of the survey recipients historically least likely to complete the surveys without Census enumerator follow-up.

## II. Internet/Technology Response Option

Internet and mobile-phone use by Latinos: We believe that providing a means for electronic response could potentially increase participation rates for some residents while holding down costs, and would be consistent with the growing use of new technology in a variety of governmental operations. However, while we support the idea of adding an Internet response option, we are mindful of disparities in broadband use and the presence of computers in households of different racial/ethnic and socio-economic groups, as well as public concerns about the privacy of electronic data. It is important that efforts to take advantage of new technology for a more efficient and cost-effective Census do not leave traditionally hard-to-count communities behind, and we urge the Bureau not to view the Internet response option as a replacement for paper-based questionnaires, and in-person enumerator follow-up. At the same time, we also note that many Latinos use mobile phone applications, and a mobile phone-based response option could significantly strengthen the Bureau's ability to reach Latino residents. We urge the Bureau to assess the potential of mobile phones as it proceeds to evaluate the use of new technology to improve the quality of public participation in the Census.

Need for multilingual Internet response "push" materials: We are aware that the Bureau recognizes and intends to take advantage of the efficient opportunity that Internet-based response platforms offer for making Census forms and instructions available in multiple languages. However, the Bureau will not be able to effectively utilize this opportunity unless mailings and other contact methods and materials that encourage recipients to respond through the Internet are also multilingual. For example, a monolingual Spanish speaker is not likely to go to the Internet to complete a survey in Spanish in response to receipt of a postcard or letter that encourages him or her to do so but is written in English only. As the Bureau's evaluation of Internet "push" approaches proceeds, we strongly encourage the Bureau to do as much testing in multiple languages of messages, vehicles, and response options as is feasible.

## III. Partnership Program and Regional Offices

Sustain the Partnership Program between decennial enumerations: We believe that continued opportunities for a diverse range of census stakeholders to monitor, understand, evaluate, and comment on the Census Bureau's plans for 2020 are vital to ensuring an accurate and fair Census. The Bureau's Partnership Program was an integral component of 2010 Census outreach efforts, and helped engage hard-to-count populations in the enumeration. We urge the Census Bureau to maintain the Partnership Program throughout

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the decade for several purposes. First, the program will help keep national, state, and local stakeholders fully informed about prospective design changes for the 2020 Census, as well as ongoing efforts to preserve a robust American Community Survey (ACS) and other important demographic and socio-economic surveys. In addition, maintaining and strengthening the network of stakeholders in the program will help ensure their robust and effective participation in the outreach efforts for the 2020 enumeration and other surveys.

Realignment of regional offices and stakeholder outreach: We are also concerned about the impact of the Bureau's realignment of its field office structure on the Bureau's partnerships with local stakeholders. The Bureau's reduction of the number of regional offices from 12 to six has expanded the size of the regions served. As a result, regional offices could experience challenges in reaching and engaging grassroots stakeholders in larger geographic regions encompassing greater cultural and socio-economic diversity. The Census Bureau must address this challenge in a proactive manner by creating plans for Regional Office outreach that take into account the new realignment. These plans should include hiring strategies that promote diversity in field staffing for the Census and other surveys and programs.

#### IV. Administrative Records

Impact of use of administrative records on enumerating hard-to-count populations: The Census Bureau is conducting research into a broader use of administrative records, both from governmental and private sector sources, to enhance decennial census operations. We understand that administrative records could help the Bureau reduce costs (for example, in updating the Master Address File), and improve certain operations (such as the ability to reach people through e-mail or cell phones). However, we are deeply concerned about the quality, consistency, and accuracy of administrative records, especially with respect to detailed information about race and ethnicity and household relationships. We also believe that information in administrative records about hard-to-count populations may be less complete, accurate and up-to-date than the information about other populations. This results in part from the fact that many residents in hard-to-count populations are extremely mobile, live in non-traditional housing, and have lower incomes than the overall population.

Thus, we are opposed to any attempts to replace the information gathered from door-to-door visits to households that do not respond by mail, Internet, or telephone, with data from administrative records. While we understand that the Bureau has no intention of replacing traditional methods to reach people, we believe that administrative records should only be used if their application does not create disparate results for traditionally hard-to-count communities, and does not diminish the quality or accuracy of data on the Latino population.

Therefore, the Bureau should examine the use of administrative records more thoroughly to evaluate the quality of these records in terms of traditionally undercounted communities. For example, a November 2014 report from the International Journal of Population Research indicates that the net undercount of very young Latino children (age 0 – 4) in the 2010 Census was higher than the undercount for any other comparable population group.

These children, and other hard-to-count residents, such as undocumented immigrants, are unlikely to appear in the types of administrative records the Bureau proposes to use. Confidentiality and privacy concerns: We also are mindful that the American public is wary of government access to personal information, and that a successful Census depends, in large part, on public confidence in the absolute confidentiality of the information individuals provide to the Census. Our nation's residents will not participate in the Census if they believe it will violate their privacy. Thus, we are not only concerned about how the Bureau utilizes administrative records, but also how it communicates this use to our country's residents in a manner that does not undermine public trust in the confidentiality of Census information.

We believe the foregoing recommendations will help ensure that the 2020 Census, the ACS, and other Census Bureau surveys collect and produce the most accurate information about the nation's diverse population, and we remain committed to working with the Bureau to achieve this important goal. Should you have any questions, please contact [redacted]. Thank you for your consideration of our views.

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Project RACE (Reclassify All Children Equally) respectfully submits the comments below regarding the 2015 Optimizing Self-Response and Census Tests. We are the national advocates for multiracial children and their families. We are often rendered invisible by federal agencies in the discussions and planning for racial and ethnic classifications. We are concerned with ways to enhance the quality, utility, and clarity of the information to be collected in the 2020 Census regarding race and ethnicity. As you know, the 2000 Census partially accommodated multiracial respondents by allowing us to check more than one racial box. The request by the multiracial community to use the preferred term “multiracial” was denied then and for the 2010 Census. As a result, multiracial respondents who checked more than one race are called “MOOMS” (Check One Or More), “Two or More Race People,” or “In Combination” respondents for purposes of tabulation. Tabulation wording does influence common usage because it is a descriptor of the total numbers. OMB advised federal agencies to utilize “in combination” in its guidance for federal data on race and ethnicity in December, 2000. However, there has been much confusion about the nomenclature since 1997 when OMB specified, “When the primary focus of a report is on two or more specific identifiable groups in the population, one or more of which is racial or ethnic, it is acceptable to display data for each of the particular groups separately and to describe data relating to the remainder of the population by an appropriate collective description.” Our requests for utilizing the word “multiracial” on the federal forms has been denied, even though it is important for multiracial children to see a descriptive word for themselves that is correct, respectful, and accurate. We work with many schools, medical facilities, clinical trials, etc. that do use the term “multiracial” on the forms with these directions: If you are multiracial, you may select two or more races. We would like to see testing of this wording on the instructions for the 2020 Census. Census Bureau personnel have indicated that will not happen. We have not been given any reason and our suggestion was not tested. The instructions for indicating a person’s races are critical to the clarity of the category, which can affect the total numbers of people across all racial classifications. The multiracial population needs assurance that we will not lose numbers based on how the question is asked. “Mark X one or more boxes” proved to be confusing. Our hope is that the testing of “Mark all boxes that apply...note, you may report more than one group” will prove more effective for the multiracial population.

It would be very meaningful to the multiracial population if the appropriate term is at the very least used for tabulation, replacing “in combination.” Ironically, the Census Bureau often uses the term “multiracial” when discussing this population and in presentations, but not in its “official” data collection. If you seek clarity, the term “alone” should be dropped or changed to “racial,” and the term “in combination,” should be changed to “multiracial.” To give an example, consider that the decisions of the OMB and Census Bureau are often reflected by the media. When we see a racial and ethnic pie chart in a newspaper or Internet story, we want to see the multiracial community represented as “multiracial,” not “combination people” or “other.” Both OMB and Census personnel know perfectly well that proper nomenclature is extremely important when used to describe race and ethnicity, yet it is completely disregarded when it comes to only one population group—multiracial. Additionally, it is reprehensible that OMB Bulletin No 00-02, Guidance on Aggregation and Allocation of Data on Race for Use in Civil Rights Monitoring and Enforcement (March 9, 2000) sets forth racially insensitive instructions in its EEO Enforcement instructions, whereby a person who checks more than one race is assigned to one of their minority races. Discrimination is often the result of a person designating more than one race, and to be reassigned to one race only defeats the purpose of enforcement of Title VI of the Civil Rights Act of 1964. Unfortunately, we see cases where multiracial children are bullied because they are multiracial, and they have no protection in that eventuality under the OMB guidelines.

We ask that these issues be revisited in testing for the 2020 Census. Changing “in combination” to “multiracial” would mean government acceptance of a word that is very widely used by non-governmental entities. It would also indicate sensitivity for proper nomenclature that is given to other racial groups, which we have been asking for since 1990. Any consideration that can be given to this demographic group that is rapidly and substantially increasing would be appreciated by the multiracial community.

What I would like to see is the 5 categories in alphabetic order. The exact way OMB Directive 15 has it listed. If there are any sub-category than it should be under its respected group.

American Indian

-sub group

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Asian  
-sub group  
Black  
-sub group  
Hispanic  
-sub group  
Native Hawaiian  
-sub group  
White  
-sub group

Having the Asian and Pacific Islander category lump together defeats omb directive 15 which separates the Asian and NHPI community.

My name [redacted] and I am a board member and the South Florida representative of the [redacted]. I am also a Computer Systems Engineer, and Business Academic by trade. Below are my personal observations.

1. I support the combined question on Race and Ethnicity as an improvement the way the question was worded in the 2010 Census. It is my believe that it shows equity in the treatment of the various groups and will improve the accuracy of the count. This is given my understanding of the constraints and the research that has been done to date (AQE in 2010 and post 2010 testing)
  - a. Suggestion: Given that most of the responses are expected to be obtained in an electronic format, I believe that when soliciting for detailed race data on a second screen, a drop down list should be offered that lists ALL possibilities of national origin. This should be instead of a second screen that allows a selection of about 6 groups and a space to write in information. This will allow true equity and allow all subgroups to have easily access to data.
  - b. Unclear\concern: How is a White Latino counted who checks both boxes? Will he or she now show up as One or More races and thus not be counted as White. I believe that we will have a more accurate picture of the number of Latinos, but given that many Latinos self-identify as white, will they no longer be counted as white. Is this a case of curing one ailment and causing another.
  - c. Question: The MENA category is . Is it just lobbying from the MENA population that has this category added? The MENA category may be plagued with the same issues of the Hispanic category as a grouping
2. I applaud the use of digital media to capture census data, but belief it must be used appropriately to solve the issue. I believe we are using technology to automate a paper process. Instead we need to use technology to conduct the census.
  - a. My suggestion in 1a above is an example of that.

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b. Concern: Adequate funding is still needed for door to door follow up. We will have people without access to technology and they must be counted. Their numbers are critical in social work areas. Progress in battling poverty and improving our economy depend on that.

c. Concern: Adequate funding is needed for initial implementation of systems. Let's not be solely concerned about using technology for cutting costs. You would have more upfront costs when you implement new systems and in the long run you would see savings . Getting the best system should not suffer from a need to cut technology. We have to do this right and we have the opportunity now with the process change to do things the best way possible.

3. The term national origin and ethnicity seem to still warrant more research. All the more reason why we need to ensure that we are accurately funding Census research and automation.

Thank you for all the work done in this important endeavor and for engaging the community to ensure we have as accurate and complete a count as possible.

[Multiple Submissions]

We, the undersigned, are stakeholders interested in policy and programmatic recommendations regarding the 2020 Decennial Census that will ensure an accurate count of all Asian American, Native Hawaiian and Pacific Islander (NHPI) communities across the country. We appreciate the opportunity to respond to the proposed information collection published by the Census Bureau on December 2, 2014 at 79 Fed. Reg. 71377, which seeks input on the upcoming 2015 National Content Test. We offer the following comments on the topics of the 2015 National Content Test as ways to enhance the quality, utility, and clarity of the information to be collected; and ways to minimize the burden of the collection of information on the respondents, including through the use of automated collection techniques or other forms of information technology.

#### I. Race and Origin Content

Asian Americans and Native Hawaiian and Pacific Islanders (NHPIs) are among our nation's fastest growing and most diverse racial groups. Often viewed as homogenous, these communities include more than 50 detailed subgroups that can differ dramatically across key social and economic indicators. Without accurate data by detailed subgroup, some of the most disadvantaged in our communities are rendered invisible to policy makers, leaving their critical needs unmet. Through the decennial census, American Community Survey, and other national surveys, the Census Bureau stands as the single most important source of disaggregated data, currently providing data on the size and characteristics of 24 Asian American and 22 NHPI detailed subgroups. Maintaining or improving upon

the quality of these detailed data is essential to informed public policy on our communities and the fair allocation of federal, state, and local funding.

Testing thus far suggests some changes being considered would result in decreased detailed race reporting among Asian Americans and NHPIs. As results of the 2015 National Content Test will help guide the Census Bureau's decision-making, and represents the last major testing opportunity before decisions must be made, it is critical that all steps are taken to address the consistent decrease in

detailed race reporting among Asian Americans and NHPIs seen across different tests.

#### A. Key Principles for 2020 Census

We believe the following overarching principles should guide the Census Bureau as it moves forward with its efforts on determining the race and ethnicity questions for the 2020 census. In many of our conversations and in the design proposals for testing variations in the measure of race and ethnicity, the Census Bureau has noted "balance," "equity," and "symmetry" as central tenets of this effort.

However, this approach overlooks two other important, and fundamental, tenets that are centrally important for Census data collection on the race and ethnicity of U.S.

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persons:

- 1) Ensuring that we do not move backwards from the detailed reporting achieved in the 2010 Census, which should serve as the baseline for effective practice and;
- 2) Ensuring the accuracy of the data collected.

*Principle #1: 2010 Census as a Baseline for Effective Practice - We cannot go backwards*

Any data collected in future census must meet the standard already achieved in 2010. This is a minimum or floor, with the hopes that future efforts can build on this foundation. We cannot go backwards in terms of the quality of detailed data collected on Asian American and NHPI groups. In order to honor this principle, we recommend the following practices:

- **A maximum number of check boxes should be included, with the number used during the 2010 Census serving as a minimum** - Check boxes capturing detailed race groups improve detailed race reporting and should be utilized for all race groups, regardless of whether or not the race and Hispanic origin questions are combined.;
- **A maximum number of examples should be included, with the number used during the 2010 Census serving as a minimum** - Examples are critical in soliciting detailed race reporting from detailed race groups not represented by check boxes and should also be utilized;
- **NHOPI response options should be clearly identified separate from Asian American response options** – Increasing the visibility of NHOPI response options will help promote their detailed race reporting, which was particularly low during the 2010 Census.

Any further testing should:

- Keep (at a minimum) the practice of having 6 separate check boxes for Asian sub-categories and 3 separate check boxes for Pacific Islander sub-categories.
- “Other Asian” and “Other Pacific Islander” categories should be included, with listings of the same number of examples used in the 2010 Census (at a minimum, 5 for Other Asian American and 2 for Other Pacific Islander).
- Improve upon this baseline, e.g. increasing the number of check boxes and listing of examples, not decreasing these options.

*Principle #2: Accuracy*

Without accurate data by detailed subgroup, the diversity in the Asian American and NHPI communities means some of the most disadvantaged in our communities are rendered invisible to policy makers, leaving their critical needs unmet. In reviewing proposed research panels, we observed that the proposed formats decreased both the number of separate checkboxes and listings of examples for Asian American and NHPI race groups compared to Census 2010 – practices that have been



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demonstrated by research to be both ineffective and a threat to accuracy. The most recent AQE testing results<sup>1</sup> confirm that:

**Removing check boxes used to capture detailed race groups also decreased the amount of detailed race reporting among Asian Americans.** Indeed, these formats yielded the lowest detailed race reporting among Asian Americans of any format tested.

**Removing a subgroup or national origin from the list of examples for each broad race category reduced reporting for that group.** Testing conducted as part of the 2005 National Census Test<sup>2</sup> suggests that limiting or removing the list of examples has a negative impact on detailed reporting.

- In addition to the recommendations above regarding check boxes and examples, we recommend the following to ensure more accurate data on the Asian American and NHPI communities:
- **Oversampling Asian Americans and NHPIs by ethnic group in future testing protocols**, ensuring an adequate sample of both large and small groups across all panels;
- **Providing adequate Asian and Pacific Island language assistance** to ensure meaningful responses from limited-English proficient Asian Americans and NHPIs and to ensure results are not biased by English-fluent respondents.

#### B. Question Format

##### 1. Separate race and origin questions

We support the continued testing of the separate race and origin questions. This format continues to provide the best detailed reporting on Asian American, NH and PI groups and is our preferred method of data collection on race and ethnicity so long as the detailed reporting remains higher with this format. **Preservation of the NH checkbox (stand-alone) is consistent with Census' 2000**

**and 2010.**

2. Combined question with checkboxes and write-ins on same screen Because the Census Bureau is not planning to test a combined question that provides specific group checkboxes for Asian Americans and NHPIs in its paper version, we are concerned that by testing and adopting these design practices, the Census Bureau is introducing new barriers for Asian American populations that did not exist before that will certainly harm the accuracy of the data being collected.

Additionally, the manner in which data is collected for both large and small groups must address the accuracy needs of both. Given the historical opportunity that the 2020 Census presents to accurately capture America's changing racial and ethnic demographics – we cannot waste time or resources in retesting bad designs and creating new barriers to accuracy in detailed reporting.

Thus, we are concerned with potential biases that may be introduced when check-boxes for detailed subgroups are only offered on the internet-based version of the Census form (Gonzalez 2014; Collins et al. 2014; Choi and DiNitto 2013). Even in recent years, as access to technology has increased dramatically, there are still barriers to access for the elderly and low-income people.

Understanding the effects of this divide is critical given that Census data is used to ensure political representation as well as healthcare services, in-language job training centers, and senior care centers (US Bureau of the Census 2010).<sup>4</sup> Although internet-surveys are increasingly popular, response rates tend to be lower using this method than traditional survey methods, potentially biasing results (Fan and Yan 2010; Shih and Fan 2008).<sup>5</sup> Extrapolating from past research, we can assume that those who are elderly, low-income,

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and less English-language proficient will be least likely to access the internet-based survey.

These are the very populations within the Asian American and NHPI communities that we hope would have the option to fill out a detailed subgroup checkbox, but that will be more likely to access a paper version of the Census form (which will not include the detailed subgroup check-box option). NH colleagues fear that if the data is collected by aggregated race identifiers, then data will be

published and reported in the same manner, by example of collection. By reporting aggregated NHPI data, it further marginalizes all the detailed race populations covered within this race identifier. NH and PI health, education and welfare needs are dissimilar by reason of political relationship and different historical experience with the U.S. federal government. Disaggregated collection and reporting is the only way needs can be addressed for these populations.

We encourage you to include the same version of the Census questions on race on both the paper and internet versions of the survey so that any differences in the likelihood of providing detailed subgroup information can be properly attributed (i.e. to question format or to form medium). With regard to these concerns, we make the following recommendations:

- 1) Collect data on which AANHPI subgroups are the least likely to fill out the Census form on the internet (refusal rates by subgroup)
- 2) Collect data on whether refusals vary by age and English-language proficiency; if these data are available, provide information to the public about refusal rates by English-language proficiency and ethnic subgroups
- 3) Preserve the stand-alone “Native Hawaiian” checkbox as presented in Census 2000 and 2010 paper versions.

A significant proportion of AANHPIs are not English-language proficient and their participation in the testing will be reduced by any design that does not include Asian languages. We encourage you to make every effort to include outreach and information related to the September testing in-language and request that you share your plan for outreach and how the Census will collect and record data on refusals/non-respondents. Finally, we ask that you share your plan for recruiting Native Hawaiian/Pacific Islanders into the September 2015 tests. Without their inclusion, it is impossible to understand how changes to the Census will affect these smaller, often non-English proficient, groups.

3. Combined question with checkboxes and write-ins on separate screens (Internet-only)

It will be important to provide maximum number of examples, with the number used during the 2010 Census serving as a minimum. Examples are critical in soliciting detailed race reporting from detailed race groups. The checkboxes and examples utilized in the 2010 Census should be offered on the first screen and subsequent screens for Asian Americans and NHPIs.

4. Combined question branching with detailed checkbox screens (Internet-only)

A maximum number of check boxes should be included in the branching detailed checkbox screens, with the number used during the 2010 Census serving as a minimum. A maximum number of examples should be included for the write-in option, with the number used during the 2010 Census serving as a minimum.

C. Race Response Categories

We support the testing of a separate MENA category.

II. Coverage Content (Internet Only)

Efforts to test ways to improve accurate within-household coverage are important as our nation becomes more and more complex. As the Census Bureau itself notes, the

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household structure has been diversifying in this country as a result of demographic trends such as: increases in immigration rates and the proportion of the population that is foreign born; changing migration streams now coming predominantly from Asia and Latin America, rather than from Europe; increases in cohabitation and blended families due to more divorces and remarriages; increases in the proportions of co-habitor households with children; and dramatic increases in grandparent-maintained households and nonrelative households. It will be important to ensure we have an accurate count of each household. At the same time, it is important to note that some of the factors that may make a household more complex will mean that the household is less likely to have access to the internet, such as a poorer household or a more heavily-immigrant, limited English-proficient household. To that extent, efforts to test coverage content through other means beyond the internet will be important to explore.

### III. Optimizing Self Response

We believe the focus of optimizing self-response should be about optimizing the self-response of hard to count populations. As noted in the notice, the Census Bureau has found depressed self response rates among certain respondents/areas with lower Internet usage. This testing is important to ensure that our communities are properly engaged in this effort. The Census Bureau should not just rely on internet access by traditional broadband means but should develop a strong mobile platform for response to help address disparities in broadband use between racial/ethnic and socio-economic groups. The Census Bureau should also study the results of this testing across different racial, ethnic and subgroup groupings as well as by owner versus renter and by age

### IV. Language

We are concerned that the notice does not detail the “additional options for non-English speakers to complete the questionnaires.” There are more than 800 spoken Asian languages and dialects. According to the 2013 ACS 5-year estimates, over seventy-five percent of Asians speak a language other than English at home and nearly 1 out of 3 are limited English-proficient (LEP) – that is, speak English “less than very well”, creating quite a challenge in information dissemination efforts. In addition, older generation immigrants have a different adaptation rate when it comes to speaking/understanding the English language.

Without more detail we can only assume that the Census Bureau's plans to provide language assistance to the many limited-English people that need help filling out their forms outside of Spanish is not fully developed. Lack of English fluency is a real barrier in getting many limited English proficient persons to fill out their surveys. The Census Bureau's own focus group research leading into the last census found that Asian Americans believed that lack of in-language questionnaires and lack of English language fluency were among the major barriers to having greater participation in the census among the Asian American communities.

Similar to the Census Bureau's efforts to include in-language messages in the 2010 Census Advance Letter, the Census Bureau should test including in-language messaging to optimize self-responses in additional Asian languages. The Census Bureau should target language minority communities not just by the size of Limited English Proficient community but also for those groups that have the highest LEP rates and high levels of "linguistically isolated" households, which may represented smaller groups but ones with huge needs. The Census Bureau must also ensure that its translations are of high quality, easily understood in language, and do not inadvertently offend the language community. The Census Bureau should establish and share a systematic process for high quality and accurate translations for both questionnaires (and the subsequent communications campaign) that includes identifying and utilizing appropriate partners. Messaging developed must be easily translated into other languages and the Census Bureau should engage appropriate partners through its partnership program to review messaging for efficacy, including cultural appropriateness.

### V. Conclusion

We hope these comments are helpful to the Census Bureau as it finalizes its plans for the 2015 Content Test. We are happy to discuss any of these topics in greater detail and appreciate the opportunity to comment in the first instance. Please feel free to contact us at [contact information] if you have any further questions.

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Sincerely,

Please note that again we remain extremely concerned that the Caribbean demographic as a bloc does not seem to have any real identifier on this test. To allow Haitians to identify but to ignore Caribbean under the “ Black or African American” category is not only wrong but a slap in our faces as Haiti is only one country in wider Caribbean region.

Unless each nationality from within the region will be allowed to write in their origin under black, we again urge you to simply have a sub category under Black where people can simply and adequately tick Caribbean or West Indian. This ensures everyone from this region can identify while covering the entire grouping.

If the Census is really concerned about accuracy it will allow Caribbean nationals or West Indians to identify themselves.

[Multiple Submissions]

This is to express my support for the combined question on Race and Ethnicity that has been tested for use on the 2020 Census Form.

In addition, I would like to say that as the Census enters the digital age,. it is important that you do not leave behind many in our community who do not have access to a computer or a smart phone. I hope that adequate funds will be in place to ensure we can go door to door in the hard to count communities.

We appreciate this opportunity to provide comments in response to the Department of Commerce’s Request for Public Comment. UNITED SIKHS is a U.N. affiliated, international, non-profit, humanitarian relief, human development and advocacy organization, aimed at empowering those in need, especially disadvantaged and minority communities across the world.

Since September 11, 2001, our organization has seen a rise in the need for policy advocacy and legal representation for Sikh American community members in the areas of hate crimes, bullying, discrimination, and profiling. With the media images of Bin Laden and Al Qaeda embedded in society, the Sikh community in the United States has suffered from unprecedented misconceptions and hate.

Sikhism stands as the fifth largest religion in the world and has transformed into a racial and ethnic group as time has progressed due to the unique and distinct articles of faith, such as: the turban, beard, and uncut hair. It is these articles of faith that make the religion a unique target for hate.

We strive to advocate for the safety of our community through our work on Capitol Hill and in conjunction with the Administration and its various agencies. However, one of the biggest setbacks for the Sikh community and our advocacy work is the lack of consistent numbers of Sikhs residing in the United States.

We write to you today about the dire need for Sikhs to be counted as a separate category within the U.S. Census. In order for us to adequately advocate for the Sikh community, we need to know how many Sikhs reside in the United States so we know the percentages and ratios important for such advocacy work. As it stands, we don’t have those numbers. Some Sikh groups will say 500,000 Sikhs live in this country, while others say one million. We have no way of knowing for sure until we are counted in the Census.

UNITED SIKHS worked tirelessly on this issue in previous years, in hopes of change for the 2010 Census. We successfully began a campaign to inform Sikhs to check "OTHER" and write in "Sikh" on their Census forms. This proved unsuccessful as we struggled to reach out to every Sikh family.

With the 2020 Census in mind, we now are hoping to see one of two things happen:

1.) A form that allows everyone to write in what they are underneath the five main categories. This way a Sikh could right “Sikh” underneath “Asian.” The accompanying package with how to fill out the form would explain this clearly and provide examples, one being to write “Sikh” under “Asian.” OR

2.) We maintain the option to check “OTHER” and write in “Sikh” but an additional pamphlet in English and Punjabi would explain “If you are a Sikh American, please check off

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“OTHER” and write in “Sikh.” This would assure every self-identified Sikh would have this option.

While a small addition to the already existent pamphlets, such a step would provide numbers for the Sikh community and advocacy groups that are vital for the safety and progression of the community.

In addition, we would like to raise some concerns about the objectives listed for your test:

- 1.) We request that the option for mail-in still be given to every household in America. Many low income families consist of non-English speaking elderly individuals who do not even possess e-mail addresses and will not be able to fill out their forms on line. An entire sub-group of every race, ethnicity, and religion will be left out.
- 2.) As you explore the options for non-English materials, we hope you will consider Punjabi as one of those alternative languages. As stands, the Department of Justice, Department of Education, Department of Homeland Security, the White House, and others all have started including Punjabi in their non-English materials. As an emerging group with strong ties to the civil and human rights movement in this country, Punjabi has become a vital language for community services.
- 3.) Similar to the options of various Native American tribal affiliations, we hope an option to list “Sikh” under Asian or under South Asian can be included. We emphasize the dire need for the numbers and the powerful impact those numbers will have on a major community in the United States.

Finally, we agree with and share the concerns raised by the Leadership Conference in their letter to you regarding race and ethnicity concerns for the enforcement of civil rights protections.

We hope you will keep the ongoing civil and human rights for the Sikh community in mind as you proceed with your work on the Census. If you have any questions about these comments, please contact [redacted].

[Multiple Submissions]

We, the undersigned, are stakeholders interested in policy and programmatic recommendations regarding the 2020 Decennial Census that will ensure an accurate count of all Asian American, Native Hawaiian and Pacific Islander (NHPI) communities across the country. We appreciate the opportunity to respond to the proposed information collection published by the Census Bureau on December 2, 2014 at 79 Fed. Reg. 71377, which seeks input on the upcoming 2015 National Content Test. We offer the following comments on the topics of the 2015 National Content Test as ways to enhance the quality, utility, and clarity of the information to be collected; and ways to minimize the burden of the collection of information on the respondents, including through the use of automated collection techniques or other forms of information technology.

#### I. Race and Origin Content

Asian Americans and Native Hawaiian and Pacific Islanders (NHPIs) are among our nation’s fastest growing and most diverse racial groups. Often viewed as homogenous, these communities include more than 50 detailed subgroups that can differ dramatically across key social and economic indicators. Without accurate data by detailed subgroup, some of the most disadvantaged in our communities are rendered invisible to policy makers, leaving their critical needs unmet. Through the decennial census, American Community Survey, and other national surveys, the Census Bureau stands as the single most important source of disaggregated data, currently providing data on the size and characteristics of 24 Asian American and 22 NHPI detailed subgroups. Maintaining or improving upon

the quality of these detailed data is essential to informed public policy on our communities and the fair allocation of federal, state, and local funding.

Testing thus far suggests some changes being considered would result in decreased detailed race reporting among Asian Americans and NHPIs. As results of the 2015 National Content Test will help guide the Census Bureau’s decision-making, and represents the last major testing opportunity before decisions must be made, it is critical that all steps are

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taken to address the consistent decrease in

detailed race reporting among Asian Americans and NHPs seen across different tests.

**A. Key Principles for 2020 Census**

We believe the following overarching principles should guide the Census Bureau as it moves forward with its efforts on determining the race and ethnicity questions for the 2020 census. In many of our conversations and in the design proposals for testing variations in the measure of race and ethnicity, the Census Bureau has noted “balance,” “equity,” and “symmetry” as central tenets of this effort.

However, this approach overlooks two other important, and fundamental, tenets that are centrally important for Census data collection on the race and ethnicity of U.S. persons:

- 1) Ensuring that we do not move backwards from the detailed reporting achieved in the 2010 Census, which should serve as the baseline for effective practice and;
- 2) Ensuring the accuracy of the data collected.

**Principle #1: 2010 Census as a Baseline for Effective Practice - We cannot go backwards**

Any data collected in future census must meet the standard already achieved in 2010. This is a minimum or floor, with the hopes that future efforts can build on this foundation. We cannot go backwards in terms of the quality of detailed data collected on Asian American and NHPI groups. In order to honor this principle, we recommend the following practices:

- A maximum number of check boxes should be included, with the number used during the 2010 Census serving as a minimum - Check boxes capturing detailed race groups improve detailed race reporting and should be utilized for all race groups, regardless of whether or not the race and Hispanic origin questions are combined.;
- A maximum number of examples should be included, with the number used during the 2010 Census serving as a minimum - Examples are critical in soliciting detailed race reporting from detailed race groups not represented by check boxes and should also be utilized;
- NHPI response options should be clearly identified separate from Asian American response options – Increasing the visibility of NHPI response options will help promote their detailed race reporting, which was particularly low during the 2010 Census.

Any further testing should:

- Keep (at a minimum) the practice of having 6 separate check boxes for Asian sub-categories and 3 separate check boxes for Pacific Islander sub-categories.
- “Other Asian” and “Other Pacific Islander” categories should be included, with listings of the same number of examples used in the 2010 Census (at a minimum, 5 for Other Asian American and 2 for Other Pacific Islander).
- Improve upon this baseline, e.g. increasing the number of check boxes and listing of examples, not decreasing these options.

**Principle #2: Accuracy**

Without accurate data by detailed subgroup, the diversity in the Asian American and NHPI communities means some of the most disadvantaged in our communities are rendered invisible to policy makers, leaving their critical needs unmet. In reviewing proposed research panels, we observed that the proposed formats decreased both the

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number of separate checkboxes and listings of examples for Asian American and NHPI race groups compared to Census 2010 – practices that have been demonstrated by research to be both ineffective and a threat to accuracy. The most recent AQE testing results<sup>1</sup> confirm that:

- Removing check boxes used to capture detailed race groups also decreased the amount of detailed race reporting among Asian Americans. Indeed, these formats yielded the lowest detailed race reporting among Asian Americans of any format tested.
- Removing a subgroup or national origin from the list of examples for each broad race category reduced reporting for that group. Testing conducted as part of the 2005 National Census Test<sup>2</sup> suggests that limiting or removing the list of examples has a negative impact on detailed reporting.

In addition to the recommendations above regarding check boxes and examples, we recommend the following to ensure more accurate data on the Asian American and NHPI communities:

- Oversampling Asian Americans and NHPs by ethnic group in future testing protocols, ensuring an adequate sample of both large and small groups across all panels;
- Providing adequate Asian and Pacific Island language assistance to ensure meaningful responses from limited-English proficient Asian Americans and NHPs and to ensure results are not biased by English-fluent respondents.

#### B. Question Format

##### 1. Separate race and origin questions

We support the continued testing of the separate race and origin questions. This format continues to provide the best detailed reporting on Asian American, NH and PI groups and is our preferred method of data collection on race and ethnicity so long as the detailed reporting remains higher with this format. Preservation of the NH checkbox (stand-alone) is consistent with Census' 2000

and 2010.

2. Combined question with checkboxes and write-ins on same screen Because the Census Bureau is not planning to test a combined question that provides specific group checkboxes for Asian Americans and NHPs in its paper version, we are concerned that by testing and adopting these design practices, the Census Bureau is introducing new barriers for Asian American populations that did not exist before that will certainly harm the accuracy of the data being collected.

Additionally, the manner in which data is collected for both large and small groups must address the accuracy needs of both. Given the historical opportunity that the 2020 Census presents to accurately capture America's changing racial and ethnic demographics – we cannot waste time or resources in retesting bad designs and creating new barriers to accuracy in detailed reporting.

Thus, we are concerned with potential biases that may be introduced when check-boxes for detailed subgroups are only offered on the internet-based version of the Census form (Gonzalez 2014; Collins et al. 2014; Choi and DiNitto 2013). Even in recent years, as access to technology has increased dramatically, there are still barriers to access for the elderly and low-income people.

Understanding the effects of this divide is critical given that Census data is used to ensure political representation as well as healthcare services, in-language job training centers, and senior care centers (US Bureau of the Census 2010).<sup>4</sup> Although internet-surveys are increasingly popular, response rates tend to be lower using this method than traditional survey methods, potentially biasing results (Fan and Yan 2010; Shih and Fan 2008).<sup>5</sup> Extrapolating from past research, we can assume that those who are elderly, lowincome,

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and less English-language proficient will be least likely to access the internet-based survey.

These are the very populations within the Asian American and NHP communities that we hope would have the option to fill out a detailed subgroup checkbox, but that will be more likely to access a paper version of the Census form (which will not include the detailed subgroup check-box option). NH colleagues fear that if the data is collected by aggregated race identifiers, then data will be

published and reported in the same manner, by example of collection. By reporting aggregated NHP data, it further marginalizes all the detailed race populations covered within this race identifier. NH and PI health, education and welfare needs are dissimilar by reason of political relationship and different historical experience with the U.S. federal government. Disaggregated collection and reporting is the only way needs can be addressed for these populations.

We encourage you to include the same version of the Census questions on race on both the paper and internet versions of the survey so that any differences in the likelihood of providing detailed subgroup information can be properly attributed (i.e. to question format or to form medium). With regard to these concerns, we make the following recommendations:

- 1) Collect data on which AANHPI subgroups are the least likely to fill out the Census form on the internet (refusal rates by subgroup)
- 2) Collect data on whether refusals vary by age and English-language proficiency; if these data are available, provide information to the public about refusal rates by English-language proficiency and ethnic subgroups
- 3) Preserve the stand-alone “Native Hawaiian” checkbox as presented in Census 2000 and 2010 paper versions.

A significant proportion of AANHPIs are not English-language proficient and their participation in the testing will be reduced by any design that does not include Asian languages. We encourage you to make every effort to include outreach and information related to the September testing in-language and request that you share your plan for outreach and how the Census will collect and record data on refusals/non-respondents. Finally, we ask that you share your plan for recruiting Native Hawaiian/Pacific Islanders into the September 2015 tests. Without their inclusion, it is impossible to understand how changes to the Census will affect these smaller, often non-English proficient, groups.

3. Combined question with checkboxes and write-ins on separate screens (Internet-only)

It will be important to provide maximum number of examples, with the number used during the 2010 Census serving as a minimum. Examples are critical in soliciting detailed race reporting from detailed race groups. The checkboxes and examples utilized in the 2010 Census should be offered on the first screen and subsequent screens for Asian Americans and NHPs.

4. Combined question branching with detailed checkbox screens (Internet-only)

A maximum number of check boxes should be included in the branching detailed checkbox screens, with the number used during the 2010 Census serving as a minimum. A maximum number of examples should be included for the write-in option, with the number used during the 2010 Census serving as a minimum.

C. Race Response Categories

We support the testing of a separate MENA category.

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Efforts to test ways to improve accurate within-household coverage are important as our nation becomes more and more complex. As the Census Bureau itself notes, the



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household structure has been diversifying in this country as a result of demographic trends such as: increases in immigration rates and the proportion of the population that is foreign born; changing migration streams now coming predominantly from Asia and Latin America, rather than from Europe; increases in cohabitation and blended families due to more divorces and remarriages; increases in the proportions of co-habitor households with children; and dramatic increases in grandparent-maintained households and nonrelative households. It will be important to ensure we have an accurate count of each household. At the same time, it is important to note that some of the factors that may make a household more complex will mean that the household is less likely to have access to the internet, such as a poorer household or a more heavily-immigrant, limited English-proficient household. To that extent, efforts to test coverage content through other means beyond the internet will be important to explore.

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We believe the focus of optimizing self-response should be about optimizing the self-response of hard to count populations. As noted in the notice, the Census Bureau has found depressed self response rates among certain respondents/areas with lower Internet usage. This testing is important to ensure that our communities are properly engaged in this effort. The Census Bureau should not just rely on internet access by traditional broadband means but should develop a strong mobile platform for response to help address disparities in broadband use between racial/ethnic and socio-economic groups. The Census Bureau should also study the results of this testing across different racial, ethnic and subgroup groupings as well as by owner versus renter and by age

### IV. Language

We are concerned that the notice does not detail the “additional options for non-English speakers to complete the questionnaires.” There are more than 800 spoken Asian languages and dialects. According to the 2013 ACS 5-year estimates, over seventy-five percent of Asians speak a language other than English at home and nearly 1 out of 3 are limited English-proficient (LEP) – that is, speak English “less than very well”, creating quite a challenge in information dissemination efforts. In addition, older generation immigrants have a different adaptation rate when it comes to speaking/understanding the English language.

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Similar to the Census Bureau's efforts to include in-language messages in the 2010 Census Advance Letter, the Census Bureau should test including in-language messaging to optimize self-responses in additional Asian languages. The Census Bureau should target language minority communities not just by the size of Limited English Proficient community but also for those groups that have the highest LEP rates and high levels of "linguistically isolated" households, which may represent smaller groups but ones with huge needs. The Census Bureau must also ensure that its translations are of high quality, easily understood in language, and do not inadvertently offend the language community. The Census Bureau should establish and share a systematic process for high quality and accurate translations for both questionnaires (and the subsequent communications campaign) that includes identifying and utilizing appropriate partners. Messaging developed must be easily translated into other languages and the Census Bureau should engage appropriate partners through its partnership program to review messaging for efficacy, including cultural appropriateness.

### V. Conclusion

We hope these comments are helpful to the Census Bureau as it finalizes its plans for the 2015 Content Test. We are happy to discuss any of these topics in greater detail and appreciate the opportunity to comment in the first instance. Please feel free to contact us at [contact information] if you have any further questions.

Native Hawaiian and Other Pacific Islander (NHPI) stakeholders are pleased that the U.S. Census Bureau is undertaking the massive, but critical research associated with the 2015

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National Content Test (NCT). This project is essential to bringing more equity to the collection of Census data and to providing accurate and reliable information on the diverse and growing US population, including NHPIs. As a distinct Office of Management and Budget (OMB) group, NHPIs represent hard working people who contribute to the vitality of the country and as such, deserve to be accurately reflected in the tabulations of the U.S. Census Bureau. This research will enable us to see ourselves as real people who represent diverse cultures, ethnicities, histories, languages, geographies and demographics that negate the size of our population. As a hard-to-count and hard-to-reach population, we view this effort as our best opportunity to obtain quality information on our population using robust scientific methods and evidence-based research.

We support testing the combined question for Race and Hispanic Origin for the following reasons: 1) the question format represents an equitable approach for obtaining information on all racial and ethnic groups in the US; 2) placing the OMB category checkbox for the NHPI population on a separate line will resonate with Pacific Peoples as a distinct racial group, decreasing confusion and the subsequent item non-response; 3) NHPI persons of mixed race/Hispanic origin will be able to embrace their diverse heritage, increasing the accuracy and reliability of results; and 4) detailed responses of the NHPI communities will provide disaggregated granular data on our diverse population and still provide accurate counts of the overall NHPI population.

We support testing the relationship question to include households with same-sex couples for the following reasons:

1) NHPI households that meet these new criteria deserve to be counted and tabulated; and 2) exclusion of these types of households will underestimate the true count of NHPI same-sex couple households and distort counts for the total same-sex couple households for the US population.

We support testing the within-in household coverage to improve accuracy of household rosters as it will help the Census Bureau achieve a complete and accurate enumeration of the composition of NHPI households. We know from previous censuses that NHPIs live in large complex households containing multiple generations and relatively large families. Obtaining accurate and complete rosters is essential to measuring and understanding the growing variation in US households.

We support further testing that uses different contact strategies to optimize self-response. We agree that the Internet response option is more efficient, cost-effective and offers the flexibility of using drop-down menus for example, detailed list of NHPI ethnicities. However, we believe there are segments of the NHPI population that will need access to a paper questionnaire for a number of reasons, including lack of reliable internet access, weak technology literacy, privacy concerns associated with electronic submission, and for personal comfort and scheduling.

We support testing the use of non-English materials for respondents with Limited English Proficiency (LEP) and strongly recommend that the Census Bureau continue to provide Language Assistance Guides for NHPI populations with LEP. We also recommend that the Census Bureau support the production and dissemination of culturally relevant census promotional materials on the 2020 Census.

Finally, NHPIs are not new to this process. Collectively, we led a successful effort to be recognized and counted as a distinct OMB group and this mandate has greatly enhanced our ability to measure, advocate and promote the needs of all NHPI populations and to be seen as full partners in the growth and success of the United States.

I write in support of the combined question option, both written and online. I believe such a change will significantly increase the response rate by Black population respondents of African, African American, Afro-Latino and Caribbean ethnicity and heritage. Further, the proposed form for 2020 Decennial Census with a combined race/ethnicity question creates a fair and equitable way for ALL groups to write in their country of origin if they wish to differentiate in their self-reporting. Additionally, I would like to support the continuation of the door-to-door approach to census data collection. It is vitally important that this online process does not leave behind many in our community who do not have access to a computer or a smartphone. These comments are left to support a process that provides that everyone is counted in the most accurate way.

I am [redacted] and a member of the South Carolina Caribbean Culture & Heritage, Inc. based in Charleston, South Carolina.

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This letter is to express my support for the combined question on Race and Ethnicity that has been tested for use on the 2020 Census Form.

I would also like to express my desire for consideration to be given to others in our varied communities that do not have access to computers or smart phones. The allocation of adequate funds to allow individuals to go door to door in the hard to count communities will allow for complete inclusion.

[Multiple Submissions]

In recognition of the need to ensure a complete count of every person in the United States every ten years through the Decennial Census, we the undersigned organizations (see page 2) are writing to submit our comments for the Federal Register Notice by the Commerce Department, Proposed Information Collection; Comment Request; 2015 National Content Test.

Specifically, we are writing to express our strong support for the combined race and ethnicity question option the U. S. Census Bureau is testing through the 2015 National Content Test (NCT) for the 2020 Decennial Census. We believe such a change will significantly increase the response rate by Black population respondents of African, African American, Afro-Latino and Caribbean ethnicity and heritage. Further, the proposed form for 2020 Decennial Census with a combined race/ethnicity question creates a fair and equitable way for ALL groups to write in their country of origin if they wish to differentiate in their self-reporting.

The National Coalition on Black Civic Participation, in partnership with the Institute of Caribbean Studies, has convened its Unity Diaspora Coalition to work together to help ensure the Black population is represented in the planning and execution of the 2020 Decennial Census. The Unity Diaspora Coalition (UDC) is a non-partisan, broad-based coalition of census stakeholders representing national and state-based organizations. Many of the UDC member organizations served as partners to assist the Census Bureau in achieving a successful 2010 Decennial Census that had one of the highest response rates in recent history and many plan to partner with the Census Bureau for the 2020 Decennial Census.

The UDC believes that the combined question option (printed and online) will provide more detailed data that is beneficial for a myriad of critical public and private sector purposes, which are vital to all of the American people in determining such issues as: 1) expanding business development opportunities; 2) providing adequate funding for infrastructure, programs and services in communities across the country (urban and rural); 3) providing accurate data for reapportionment and redistricting of congressional districts by states; and 4) assist in having accurate data for monitoring the enforcement of civil rights laws. Further, we know that the Census Bureau will review this issue at upcoming hearings and respectfully ask that the Bureau include our letter in the official hearing record.

In addition, as the Census Bureau enters the digital age in its effort to stay within federal budget constraints by using an online process for self-response for 2020 census count, it is vitally important that this online process does not leave behind many in our community who do not have access to a computer or a smartphone. We strongly recommend that adequate funds will be in place to ensure the door to door process remains intact to reach hard to count communities.

Thank you for the opportunity to provide our comments. Please accept the above written comments on behalf of the Unity Diaspora Coalition member organizations listed below.

Please accept these comments for official consideration per 79 FR 71377 on the U.S. Census Bureau's 2015 National Content Test:

a) Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility.

As an end user of Census data and a member of the Census Bureau's National Advisory Committee on Racial, Ethnic and Other Populations, I am an advocate for more relevant, robust, and useful census data for American Indian and Alaska Native tribal populations. Any new question wording or formatting warrants extensive field-testing; such a change

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pertaining to race, ethnicity, and Hispanic origin demands even further testing given the extensive variation and complexity of responses that stem from these questions. Such field-testing should be conducted with all populations and oversampling conducted for the hard to reach, hard to count, and small populations and subpopulations, including American Indian tribes. Regarding the practical utility of the proposed collection of information for American Indian tribes, it is not only necessary, but an obligation of the Bureau as mandated in Executive Order 13175—Consultation and Coordination With Indian Tribal Governments—to establish regular and meaningful consultation and collaboration with tribal officials in the development of Federal policies that have tribal implications. Changes to the collection and classification of racial and ethnic responses in the decennial census have the potential for significant positive or negative tribal implications and thus tribes must be formally consulted, as should the National Congress of American Indians and other American Indian and Alaska Native national advocacy organizations, and the American Indian and Alaska Native representatives appointed to serve on the Census Bureau’s National Advisory Committee on Racial, Ethnic and Other Populations who not only have subject matter expertise, but also significant stakeholder relationships in Indian Country. A letter sent to tribal leaders does not qualify as meaningful consultation with tribes. Tribal consultations should take place before the 2015 National Content Test goes live in order to ensure that tribes have input into any changes in the proposed enumeration process of American Indian and Alaska Native populations. To this end, the proposed collection of information in the 2015 content test is absolutely necessary, as is formal consultation with tribes and stakeholders prior to national testing.

b) The accuracy of the agency’s estimate of the burden (including hours and cost) of the proposed collection of information.

It is reasonable to expect that a combined race and Hispanic origin question could reduce both confusion and burden amongst those who struggled with these questions in previous censuses.

c) Ways to enhance the quality, utility, and clarity of the information to be collected.

The OMB minimum category definition for American Indian or Alaska Native as: “A person having origins in any of the original peoples of North and South American (including Central America), and who maintains tribal affiliation or community attachment” has remained stagnant for nearly twenty years. A timely update is warranted and research commencing this process is long overdue. At the least, efforts should be made by the Census Bureau to enable the disaggregation of this minimum collection of data at relevant and useful levels for tribal populations. There is not only extensive diversity between the indigenous peoples of North, South, and Central America, but also within these populations. The current OMB definition (and thus the aggregate race category for American Indian and Alaska Native in the census) is unsuitably broad.

Similarly, this Federal Register Notice is vague about any proposed changes to the sub question of American Indian and Alaska Native tribe that will be included in the 2015 National Content Test. The importance of the wording of the tribal sub question cannot be understated in yielding high quality, useful, and relevant tribal data. The current wording “Print name of enrolled or principal tribe” inhibits tribal governments from utilizing this data to get an enrolled count of their population versus those who are affiliated. While all responses are of course collected via self-identification, self-identified enrollment status is still valuable data for tribes. Given the extensive financial burden of conducting a census, few tribes have the resources to conduct large-scale demographic surveys of their tribal populations on a routine basis. As the country’s largest peacetime mobilization, the U.S. Census is the most robust and updated data source of our nation’s population. It should endeavor to do the same for tribal populations as it does all ethnic and racial populations.

Tribal data collected in the census would be of higher quality and more useful to tribes and researchers alike if the question asked for “principal tribe” or “affiliated tribe” and then had a follow up question that asked, “Are you enrolled in this tribe?” Yes/No. Tribal enrollment is undoubtedly a contentious space, however, it is one in which the Census has ventured since 1990, when the “enrolled” language was first introduced. Adding a follow up question will provide more tailored data specifically for tribal governments, which are currently poorly served by the census and to whom the U.S. government has a federal trust obligation. Moreover, several spaces could be provided to enable respondents to identify more than one tribe given the high intertribal marriage rates amongst American Indians and Alaska Natives. The additional question and additional

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spaces would not be prohibitively burdensome to an Internet test and the benefits of actually rendering useful tribal data outweigh any drawbacks. As previously mentioned, any wording changes to the race question need to be extensively tested and government-to-government consultation with American Indian tribes is mandated.

d) Ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other forms of information technology.

Utilizing the Internet and other automated techniques is practical for the general collection of information from respondents across the country. It should be noted that while some American Indian reservations and Alaska Native villages are incredibly remote with limited connectivity, others have quite sophisticated IT infrastructure. This spectrum of connectivity presents both a challenge and an opportunity for data collection. The Bureau should focus on extensive outreach in American Indian and Alaska Native communities to ensure that all reservation and village residents have access to the same instrument modes as the rest of the country. Differences in instrument modes could inject bias into the data. This is especially relevant to reservation residents given their disproportionate undercount.

Additionally, one benefit identified in this Notice for the online response mode is allowing more functionality and greater flexibility in designing questions compared to the space constrained paper versions. Currently there is only one response box available for an American Indian or Alaska Native respondent to write their tribal affiliation. If one has multiple tribal affiliations, then one is expected to fit all of those tribal names into the one response box. This has been a constraining practice that has plagued previous censuses and inhibited accurate tribal counts. The testing of multiple response spaces for tribal affiliation is recommended. One simply needs to look to the New Zealand Census as an example where indigenous respondents are given up to five spaces to identify separate tribal affiliations.

Ke Ali`i Maka`ainana Hawaiian Civic Club of Washington, D.C. appreciates the opportunity to provide a statement of our support of the 2015 National Content Test (NCT) effort.

We understand that the NCT bears the specific mandate of the U.S. Census to test data collection systems and processes asserting statistical strategies and data collection technologies to ensure accuracy, quality and clarity of said data collection to minimize cost to and increase responses from the U.S. population.

We support the efforts of the NCT to apply scientific-data driven techniques and methodologies to ensure the use of the most accurate procedures for data collection reflected in the combined question for Race and Hispanic Origin. We believe this format more effectively provides respondents with an opportunity to clearly identify an Office of Management and Budget (OMB) category checkbox; Native Hawaiian and Other Pacific Islanders, then a separate line to further clarify a distinct racial group and even further via online responses, identify a sub-group for the NHPI population. Ke Ali`i Maka`ainana Hawaiian Civic Club of Washington, D.C. spoke in support of the U.S. Census Bureau's work towards the proposed Combined Questionnaire format for the upcoming 2020 census during the 2014 Association of Hawaiian Civic Clubs convention held on the island of Hawai`i.

And finally we support NCT efforts to investigate and continuously expand collection tools that will simplify responses easily accessible by traditional paper questionnaires respondents and technology users. The transition of the U.S. population to automated tools will increase responses for granular data not currently collected, thereby decreasing cost of survey administration.

Native Hawaiian and Other Pacific Islander (NHPI) stakeholders are pleased that the U.S. Census Bureau is undertaking the massive, but critical research associated with the 2015 National Content Test (NCT). This project is essential to bringing more equity to the collection of Census data and to providing accurate and reliable information on the diverse and growing US population, including NHPIs. This research will enable us to see ourselves as real people who represent diverse cultures, histories, languages, geographies and demographics that negate the size of our population. As a hard-to-count and hard-to-reach population, we view this effort as our best opportunity to obtain quality information on our population using robust scientific methods and evidence-based research.

We support testing the combined question for Race and Hispanic Origin for the following reasons: 1) the question format represents an equitable approach for obtaining

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information on all racial and ethnic groups in the US; 2) placing the OMB category checkbox for the NHPI population on a separate line will resonate with Pacific Peoples as a distinct racial group, decreasing confusion and the subsequent item non-response; 3) NHPI persons of mixed race/Hispanic origin will be able to embrace their diverse heritage, increasing the accuracy and reliability of results;

4) detailed responses of the NHPI communities will provide disaggregated granular data on our diverse population and still provide accurate counts of the overall NHPI population.

We support testing the relationship question to include households with same-sex relationships for the following reasons: 1) NHPI households that meet these new criteria deserve to be counted and tabulated; 2) exclusion of these types of households will underestimate the true count of NHPI same-sex households and distort counts for the total same sex household for the US population.

We support testing the within-in household coverage to improve accuracy of household rosters as it will help the Census Bureau achieve a complete and accurate enumeration of the composition of NHPI households. We know from previous censuses that NHPIs live in large complex households containing multiple generations and relatively large families. Obtaining accurate and complete rosters is essential to measuring and understanding the growing variation in US households. We support further testing that uses different contact strategies to optimize self-response. We agree that the Internet response option is more efficient, cost-effective and offers the flexibility of using drop-down menus for example, detailed list of NHPI ethnicities. However, we believe there are segments of the NHPI population that will need access to a paper questionnaire for a number of reasons, including lack of reliable internet access, weak technology literacy, privacy concerns associated with electronic submission, and for personal comfort and scheduling. We support testing the use of non-English materials for respondents with limited English language proficiency and strongly recommend that the Census Bureau continue to provide language assistance guides for NHPI groups. We also encourage the Census Bureau to continue supporting culturally relevant census materials.

Finally, I am sending an attachment of Resolution 14-21 that was passed by the Association of Hawaiian Civic Clubs (the parent organization for the MCAHCC) at our 2014 Convention which “supports native Hawaiian and Pacific Islander detailed races printed on Census 2020 survey panels.” Please feel free to contact me at [redacted] if you have any questions.

[Multiple Submissions]

According to the 2010 Census, Asian Americans, Native Americans and other Pacific Islanders (NHPI) are the fastest growing races in America. i In fact, our multiple-race population has grown faster than our single-race population. ii As of 2010, 15% of Asian Americans are multi-racial iii and 56% of Pacific Islanders are multi-racial. Together, we have a stake in ensuring that our numbers are accurately accounted, as they affect our ability to accurately measure and assess the state and the future of Asian & Pacific Islander health, and the state and the future of health equity. To do this, we must be able to conduct comparative analysis that requires the ability to align our health-related numerators, with population denominators. We also have a stake in ensuring that our numbers are accurately and completely accounted for, as doing so affects our civil rights, voting rights, and language rights. A complete and accurate count affects the numbers used for redistricting, which affects the composition of the US Congress and other political jurisdictions, and has the potential to affect how public and private dollars are allocated and/or distributed.

America is changing, and the global context of America’s future is changing. Smaller populations want to be counted, and it’s important that we conduct research to see how well the 2020 Census can accommodate the dynamics of global relations/change, and other forms of social change. Towards this end, we are pleased that the US Census Bureau is undertaking research associated with the 2015 National Content Test to study how to “re-adjust” the sails, by testing the incorporation of relationship questions, within in-household coverage, new MENA categories, and the combination question for Race & Hispanic origin.

- We support testing the relationship question to include households with same-sex relationships because Asian & NHPI households that meet these new criteria deserve to be

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counted and tabulated, and exclusion of this category could underestimate the true count of Asian & NHPI same-sex households, and distort counts for the total same sex households for the US

population.

- We support testing the within in-household coverage to improve accuracy of household rosters as it will help the Census Bureau achieve a complete and accurate enumeration of Asian & NHPI households. We know from prior Censuses that many Asian & NHPI households live in large, complex households containing multiple generations and relatively large families. We are also concerned about how to reach, and enumerate, Asian & NHPIs who may be homeless, or living in multiple venues because of divorce, dual citizenship, etc.

- We support further testing that uses different contact strategies to optimize self-response. We support using the internet response option because it is more efficient, cost-effective, and offers the flexibility of using drop-down menus for a detailed list, as well as a fill-in the blank, of Asian & NHPI ethnicities. However, income, educational, and technological disparities may exacerbate a digital divide that exists for some Asian & NHPI more than others, and it is important to ensure equitable access by offering segments of the Asian & NHPI populations who will need access to a paper questionnaire for a number of reasons, including: a lack of reliable and affordable internet access and/or technology; limited technologic proficiency; and concerns about privacy and electronic submission.

- We support the use of technologies and human resources to ensure that all individuals will have equal capacity to complete Census forms. We are concerned that certain persons will need further assistance in completing the Census test/forms, including those with limited vision, persons who are not literate in English or other languages, as well as persons who are limited English proficient. Towards this end, it will be important for the Census to allocate sufficient human and technologic resources to address having culturally-sensitive human surveyors, in language training videos and in-language verbal recording devices, to ensure a complete and accurate count.

- We support testing the use of non-English materials for respondents who are limited English language proficient. We also support testing non-English materials for cultural competency, as well as sensitivity to sexual orientation.

- We support testing the combined question for Race & Hispanic Origin for the following reasons:

- (1) the question format is an equitable approach for obtaining information on all racial and ethnic groups in the US;
- (2) persons who are of mixed race/Hispanic origin will be able to embrace their diverse heritage, increasing the accuracy and reliability of results;
- (3) placing three separate OMB category checkboxes, one for Asians, one for Middle Easterners, and one for NHPIs, will resonate with each racial population as distinct racial groups, decreasing confusion and subsequent item non-response;
- (4) detailed responses of the Asian, Middle Eastern, and NHPI communities will provide disaggregated granular data on diverse populations, while still providing accurate counts of the overall Asian, Middle Eastern, and NHPI populations.

At the same time, we do not want to lose sight of measuring progress, from the past to the future, and for this reason support the continued collection, disaggregation and re-aggregation of data that allows for longitudinal analysis, and for that reason, support the continued collection of ethnicity and race.

We thank the Census Bureau for changing with the changing times, and at the same time, working with due diligence to develop technically accurate “race- and ethnic-bridges” so America can measure progress as it relates to our global past, present and future.

As you move forward with public input, and evidence-based analysis, we want to encourage the Census to make the data from the 2015 Census Test public, and invite the Asian

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& Pacific Islander Caucus (APIC) to provide future comment and testimony as the 2020 Census instrument is presented to Congress in 2017, 2018, and 2019.

APIC has a 40 year history addressing public health issues affecting APIS in the US and associated jurisdictions in affiliation with the American Public Health Association, the world's largest and oldest association of public health professionals. In 2014, APIC incorporated to become a think tank and an action tank that analyzes, interprets, advances, and disseminates research and policy solutions that have an enduring impact on the Asian & Pacific Islander health and health equity. APIC collaborates with API communities, and with the American Public Health Association, to advance API health and health equity through information-sharing, practice, research, education, policy and advocacy. We have more than 600 individual and organizational members, and would be pleased to serve as a resource to facilitate engagement, understanding and collaboration, of future dialogues about the Census, to advance America's global citizenship, and America's health and economic well-being.

I'd like to recognize all APIC members who contributed to this commentary. As you move forward, if you have any questions, need for additional information, or an invitation to participate in further commentary, please contact me at [redacted]

The Office of Hawaiian Affairs (OHA) appreciates the opportunity to respond to the Department's comment request regarding the 2015 National Content test. By way of background, OHA is a semi-autonomous agency established under the constitution and laws of the State of Hawaii. The statutory mandates for OHA include advising and coordinating federal, state, and county officials regarding Native Hawaiian programs and activities; assessing the policies and practices of other agencies as they impact Native Hawaiians; and advocating for Native Hawaiians. It is with this kuleana (responsibility) in mind that OHA submits the following for your consideration. We offer the following comments on the topics of the 2015 National Content Test as ways to enhance the quality, utility, and clarity of the information to be collected; and ways to minimize the burden of the collection of information on the respondents, including through the use of automated collection techniques or other forms of information technology.

OHA appreciates the Department's reiteration of its compliance with the U.S. Office of Management and Budget's October 30, 1997 "Revisions to the Standards for the Classification of Federal Data on Race and Ethnicity," otherwise known as OMB Directive 15. This important policy appropriately recognized that "Native Hawaiian or Other Pacific Islanders" are a distinct racial group, separate from the "Asian" category. Further, Directive 15 lists Native Hawaiian or Other Pacific Islanders ("NHPIs") as one of five "minimum groups," meaning that federal statistics, program administrative reporting, and civil rights compliance reporting on race and ethnicity must include Native Hawaiian or Other Pacific Islanders as a unique group. As stated in the Department's notice, "The 1997 OMB standards state the minimum categories that must be used to collect and present federal data on race and ethnicity." **First and foremost, OHA advocates in strong support of the U.S. Census Bureau's continued compliance with the spirit and letter of Directive 15.**

**Secondly, OHA stands alongside others in advocating for the continuation of standalone data on Native Hawaiians, as well as other subgroups within the NHPI category.** As a fiduciary with trust responsibility to better the conditions of Native Hawaiians, OHA relies on the wealth of data that the Census Bureau can provide on the current conditions of Hawaii's indigenous people (including those no longer in the State of Hawaii). Clearly, OHA is incapable of self-funding data collection of a scope and validity comparable to the multi-million dollar and multi-billion dollar undertakings of the U.S. Census. If the Census Bureau does not provide solid and reliable standalone data on Native Hawaiians, OHA's ability to understand the current conditions is limited. OHA also believes that this is in the best interest of other NHPI subgroups, due to the various differences in socioeconomic condition and political status that differentiate these populations.

While OHA does not have a statutory role in advocating on behalf of non-Hawaiians, including the Asian Americans, our comment below includes recommendations with respect to data collection for that community (Asians). It is OHA's understanding that these positions have wide support among Asian American leaders, and we encourage you to view OHA's comments on Asian data collection as the voice of an ally.

I. Race and Origin Content



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Asian Americans and Native Hawaiian and Other Pacific Islanders (NHPs) are the two fastest growing basic racial groups, according to Census data. Often viewed as homogenous, these two racial groups are distinct from each other. Even within the two separate groups, these communities include more than 50 detailed subgroups that can differ dramatically across key social and economic indicators. Without accurate data by detailed subgroup, some of the most disadvantaged in our communities are rendered invisible to policy makers, leaving their critical needs unmet. Through the decennial census, American Community Survey, and other national surveys, the Census Bureau stands as the single most important source of disaggregated data, currently providing data on the size and characteristics of 22 NHPI and 24 Asian American detailed subgroups. Maintaining or improving upon the quality of these detailed data is essential to informed public policy on our communities and the fair allocation of federal, state, and local funding.

Testing thus far suggests some changes being considered would result in decreased detailed race reporting among NHPs and Asian Americans. As results of the 2015 National Content Test will help guide the Census Bureau's decision-making, and represents the last major testing opportunity before decisions must be made, it is critical that all steps are taken to address the consistent decrease in detailed race reporting among NHPs and Asian Americans seen across different tests.

A. Key Principles for 2020 Census

We believe the following overarching principles should guide the Census Bureau as it moves forward with its efforts on determining the race and ethnicity questions for the 2020 census. In many of our conversations and in the design proposals for testing variations in the measure of race and ethnicity, the Census Bureau has noted "balance," "equity," and "symmetry" as central tenets of this effort. However, this approach overlooks two other important, and fundamental, tenets that are centrally important for Census data collection on the race and ethnicity of U.S. persons:

- 1) Ensuring that we do not move backwards from the detailed reporting achieved in the 2010 Census, which should serve as the baseline for effective practice and;
- 2) Ensuring the accuracy of the data collected.

*Principle #1: 2010 Census as a Baseline for Effective Practice - We cannot go backwards*

Any data collected in future census must meet the standard already achieved in 2010. This is a minimum or floor, with the hopes that future efforts can build on this foundation. We cannot go backwards in terms of the quality of detailed data collected on NHPI and Asian American groups. In order to honor this principle, we recommend the following practices:

- **A maximum number of check boxes should be included, with the number used during the 2010 Census serving as a minimum** - Check boxes capturing detailed race groups improve detailed race reporting and should be utilized for all race groups, regardless of whether or not the race and Hispanic origin questions are combined.;
- **A maximum number of examples should be included, with the number used during the 2010 Census serving as a minimum** - Examples are critical in soliciting detailed race reporting from detailed race groups not represented by check boxes and should also be utilized;
- **NHPI response options should be clearly identified separate from Asian American response options** – Increasing the visibility of NHPI response options will help promote their detailed race reporting, which was particularly low during the 2010 Census.

Any further testing should:

- Keep (at a minimum) the practice of having 3 separate check boxes for Pacific Islander sub-categories and 6 separate check boxes for Asian sub-categories.
- "Other Pacific Islander" and "Other Asian" categories should be included, with listings of the same number of examples used in the 2010 Census (at a minimum, 2 for Other

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Pacific Islander and 5 for Other Asian American).

- Improve upon this baseline, e.g. increasing the number of check boxes and listing of examples, not decreasing these options.

*Principle #2: Accuracy*

Without accurate data by detailed subgroup, the diversity in the Asian American and NHPI communities means some of the most disadvantaged in our communities are rendered invisible to policy makers, leaving their critical needs unmet. In reviewing proposed research panels, we observed that the proposed formats decreased both the number of separate checkboxes and listings of examples for NHPI and Asian American race groups compared to Census 2010 – practices that have been demonstrated by research to be both ineffective and a threat to accuracy. The most recent AQE testing results<sup>1</sup> confirm that:

- **Removing check boxes used to capture detailed race groups also decreased the amount of detailed race reporting among Asian Americans.** Indeed, these formats yielded the lowest detailed race reporting among Asian Americans of any format tested.
- **Removing a subgroup or national origin from the list of examples for each broad race category reduced reporting for that group.** Testing conducted as part of the 2005 National Census Test<sup>2</sup> suggests that limiting or removing the list of examples has a negative impact on detailed reporting.

In addition to the recommendations above regarding check boxes and examples, we recommend the following to ensure more accurate data on the Asian American and NHPI communities:

- **Oversampling NHPIs and Asian Americans by ethnic group in future testing protocols**, ensuring an adequate sample of both large and small groups across all panels;
- **Providing adequate Asian and Pacific Island language assistance** to ensure meaningful responses from limited-English proficient NHPIs and Asian Americans and to ensure results are not biased by English-fluent respondents.

B. Question Format

1. Separate race and origin questions

We support the continued testing of the separate race and origin questions. This format continues to provide the best detailed reporting on NHPI, Asian American groups and is our preferred method of data collection on race and ethnicity so long as the detailed reporting remains higher with this format. **Preservation of the Native Hawaiian checkbox (stand-alone) is consistent with Census' 2000 and 2010.**

2. Combined question with checkboxes and write-ins on same screen

The combined question has consistently provided less accurate data for Asian Americans and NHPIs ethnic groups. Because the Census Bureau is not planning to test a combined question that provides specific group checkboxes for Asian Americans and NHPIs in its paper version, we are concerned that by testing and adopting these design practices, the Census Bureau is introducing new barriers for Asian American populations that did not exist before that will certainly harm the accuracy of the data being collected. Additionally, the manner in which data is collected for both large and small groups must address the accuracy needs of both. Given the historical opportunity that the 2020 Census presents to accurately capture America's changing racial and ethnic demographics – we cannot waste time or resources in re-testing bad designs and creating new barriers to accuracy in detailed reporting.

Thus, we are concerned with potential biases that may be introduced when check-boxes for detailed subgroups are only offered on the internet-based version of the Census

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form (Gonzalez 2014; Collins et al. 2014; Choi and DiNitto 2013). Even in recent years, as access to technology has increased dramatically, there are still barriers to access for the elderly and low-income people. 3 Understanding the effects of this divide is critical given that Census data is used to ensure political representation as well as healthcare services, in-language job training centers, and senior care centers (US Bureau of the Census 2010).4 Although internet-surveys are increasingly popular, response rates tend to be lower using this method than traditional survey methods, potentially biasing results (Fan and Yan 2010; Shih and Fan 2008).5 Extrapolating from past research, we can assume that those who are elderly, low-income, and less English-language proficient will be least likely to access the internet-based survey. These are the very populations within the Asian American and NHPI communities that we hope would have the option to fill out a detailed subgroup checkbox, but that will be more likely to access a paper version of the Census form (which will not include the detailed subgroup check-box option).

OHA and other Native Hawaiian organizations fear that if the data is collected by aggregated race identifiers, then data will be published and reported in the same manner, by example of collection. By reporting aggregated NHPI data, it further marginalizes all the detailed race populations represented within this race identifier. Native Hawaiian and PI health, education and welfare needs are dissimilar by reason of political relationship and different historical experience with the U.S. federal government. Disaggregated collection and reporting is the standard that the U.S. Census Bureau should demonstrate to other data collectors and distributors. This issue alone impacts over a half-million Native Hawaiians in the U.S. Federal agreements and funding mechanisms require specific detailed race data that represents the population of Native Hawaiians at their maximum.

We encourage you to include the same version of the Census questions on race on both the paper and internet versions of the survey so that any differences in the likelihood of providing detailed subgroup information can be properly attributed (i.e. to question format or to form medium). With regard to these concerns, we make the following recommendations:

- 1) Collect data on which NHPI and Asian subgroups are the least likely to fill out the Census form on the internet (refusal rates by subgroup)
- 2) Collect data on whether refusals vary by age and English-language proficiency; if these data are available, provide information to the public about refusal rates by English-language proficiency and ethnic subgroups.
- 3) Preserve the stand-alone Native Hawaiians checkbox as presented in Census 2000 and 2010 paper versions.

A significant proportion of NHPis and Asians are not English-language proficient and their participation in the testing will be reduced by any design that does not include NHPI and Asian languages. We encourage you to make every effort to include outreach and information related to the September testing in-language and request that you share your plan for outreach and how the Census will collect and record data on refusals/non-respondents Finally, we ask that you share your plan for recruiting Native Hawaiian/Pacific Islanders into the September 2015 tests. Without their inclusion, it is impossible to understand how changes to the Census will affect these smaller, often non-English proficient, groups.

3. Combined question with checkboxes and write-ins on separate screens (Internet-only)

It will be important to provide maximum number of examples, with the number used during the 2010 Census serving as a minimum. Examples are critical in soliciting detailed race reporting from detailed race groups. The checkboxes and examples utilized in the 2010 Census should be offered on the first screen and subsequent screens for NHPis and Asian Americans.

4. Combined question branching with detailed checkbox screens (Internet-only)

A maximum number of check boxes should be included in the branching detailed checkbox screens, with the number used during the 2010 Census serving as a minimum. A

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maximum number of examples should be included for the write-in option, with the number used during the 2010 Census serving as a minimum.

**C. Race Response Categories**

We support the testing of a separate MENA category.

**II. Coverage Content (Internet Only)**

Efforts to test ways to improve accurate within-household coverage are important as our nation becomes more and more complex. As the Census Bureau itself notes, the household structure has been diversifying in this country as a result of demographic trends such as: increases in immigration rates and the proportion of the population that is foreign born; changing migration streams now coming predominantly from Asia and Latin America, rather than from Europe; increases in cohabitation and blended families due to more divorces and remarriages; increases in the proportions of co-habitor households with children; and dramatic increases in grandparent-maintained households and non-relative households.<sup>6</sup> It will be important to ensure we have an accurate count of each household. At the same time, it is important to note that some of the factors that may make a household more complex will mean that the household is less likely to have access to the internet, such as a poorer household or a more heavily-immigrant, limited English-proficient household. To that extent, efforts to test coverage content through other means beyond the internet will be important to explore.

**III. Optimizing Self Response**

We believe the focus of optimizing self-response should be about optimizing the self-response of hard to count populations. As noted in the notice, the Census Bureau has found depressed self-response rates among certain respondents/areas with lower Internet usage. This testing is important to ensure that our communities are properly engaged in this effort. The Census Bureau should not just rely on internet access by traditional broadband means but should develop a strong mobile platform for response to help address disparities in broadband use between racial/ethnic and socio-economic groups. The Census Bureau should also study the results of this testing across different racial, ethnic and subgroup groupings as well as by owner versus renter and by age

**IV. Language**

We are concerned that the notice does not detail the “additional options for non-English speakers to complete the questionnaires.” There are more than 800 spoken Asian languages and dialects. Seventy-five percent of Asians speak a language other than English at home, creating quite a challenge in information dissemination efforts.<sup>7</sup> In addition, older generation immigrants have a different adaptation rate when it comes to speaking/understanding the English language.

Without more detail we can only assume that the Census Bureau's plans to provide language assistance to the many limited-English people that need help filling out their forms outside of Spanish is not fully developed. Lack of English fluency is a real barrier in getting many limited English proficient persons to fill out their surveys. The Census Bureau's own focus group research leading into the last census found that Asian Americans believed that lack of in-language questionnaires and lack of English-language fluency were among the major barriers to having greater participation in the census among the Asian American communities.

Similar to the Census Bureau's efforts to include in-language messages in the 2010 Census Advance Letter, the Census Bureau should test including in-language messaging to optimize self-responses in additional Asian languages. The Census Bureau should target language minority communities not just by the size of Limited English Proficient community but also for those groups that have the highest LEP rates and high levels of "linguistically isolated" households, which may represent smaller groups but ones with huge needs. The Census Bureau must also ensure that its translations are of high quality, easily understood in language, and do not inadvertently offend the language community. The Census Bureau should establish and share a systematic process for high quality and accurate translations for both questionnaires (and the subsequent communications campaign) that includes identifying and utilizing appropriate partners. Messaging developed must be easily translated into other languages and the Census

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Bureau should engage appropriate partners through its partnership program to review messaging for efficacy, including cultural appropriateness.

V. Conclusion

We hope these comments are helpful to the Census Bureau as it finalizes its plans for the 2015 Content Test. Once again, OHA's most important recommendations are:

- 1.) **OHA advocates in strong support of the U.S. Census Bureau's continued compliance with Directive 15, and**
- 2.) **OHA stands alongside others in advocating for the continuation of standalone data on Native Hawaiians, as well as other subgroups within the NHPI category.**

[Multiple Submissions]

We, the undersigned leaders of national civil rights and social advocacy organizations committed to the empowerment of peoples of the African diaspora write in response to the U.S. Census Bureau (Bureau) Federal Register Notice outlining the proposed information collection plan for the 2015 National Content Test (NCT).

As part of the research and development cycle for the 2020 Census, we appreciate the importance of the 2015 NCT in developing a decennial Census questionnaire that allows for the collection of accurate data on the racial and ethnic composition of every American community. The decennial Census—the largest peacetime mobilization operation in the U.S.—is essential in advancing equality of access and opportunity in virtually every social and economic sector. We applaud the Bureau's efforts to create equity throughout the race and ethnic categories and to maximize opportunities to self-identify and self-describe.

The Bureau's Federal Register Notice requests comments on three objectives:

1. To evaluate and compare different census content, including race and Hispanic origin, relationship and within-household coverage.
2. To test different contact strategies for optimizing self-response and
3. To test different options for offering non-English options

**1. To evaluate and compare different census content, including race and Hispanic origin, relationship and within-household coverage.**

The Bureau's goal to achieve a fair and accurate accounting of our nation's population coincides well with our country's broad demographic shift. Research on new methods for collecting race and ethnicity data in the 2020 Census began during the 2010 Census when the Bureau conducted the *Race and Hispanic Origin Alternative Questionnaire Experiment Program*. In that effort, the Bureau disseminated nearly 500,000 questionnaires, re-interviewed households within their sampling, and conducted focus groups and stakeholder meetings to evaluate alternate variations of questions about race and Hispanic origin.

Some notable findings from their extensive research were:

- that the 2010 census did not treat all race and ethnic groups equally;
- whites and blacks did not have a way to identify in or as a subgroup in the 2010 Census;
- that including Middle Eastern subgroups within the White category was not accurate

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- that the combined question yielded higher response rates;
- that the combined question better reflected self-identity;
- that the combined question increased reporting of detailed responses for most groups; and
- that many individuals across communities liked the combined question approach as it created equity throughout the different categories.

The collection of comprehensive race and ethnicity data is central to implementing and evaluating a wide array of civil rights laws and policies such as voting, employment, education, housing, health care, criminal justice and financial and economic security. We believe that the Bureau's objective of improving race and ethnic data will provide for more detailed and accurate information that will enhance implementation of civil rights laws and policies. Therefore, we support the Bureau's ongoing efforts to improve the race and ethnicity questions on the 2020 Census questionnaire. This is in keeping with the U.S. Office of Management and Budget's (OMB) standards, which advise that race and ethnicity are two distinct concepts.

Per the OMB definition, a Black or African American person is one having origins in any of the black racial groups of Africa. Therefore, we are particularly supportive of the testing and evaluation of a combined question that will include a more balanced and equal distribution of examples within each race and ethnic question, *i.e. African American, Jamaican, Nigerian, Ethiopian, Haitian and Ghanaian*. Not only does it create a more balanced and equitable distribution of examples within each racial and ethnic category, but it also allows each individual to report a racial identity as well as a country of origin.

To this end, we also support the testing and addition of a Middle Eastern or North African (MENA) category. This would be the first time in the history of the decennial Census that the diversity of the African diaspora would be assessed. We are quite interested, however, in how the Bureau disaggregates, codes and edits Sub-Saharan African responses to the MENA category. Therefore, we urge the Bureau and OMB to support the use of the combined question, in the 2020 Census.

We also support the Bureau's within-in household coverage tests. With the ever-changing economic realities, we believe that the collection of such data will allow for more precise information about the composition of black households.

## **2. To test different contact strategies for optimizing self-response**

We understand that the Bureau has been mandated by Congress to conduct the 2020 Census in a cost-effective manner that does not exceed the 2010 Census budget. We recognize that this will be an extraordinary undertaking, and applaud the Bureau for its strategy to utilize less costly methods such as web-based collection and distribution of the Census questionnaires. We agree that relative to paper forms Internet based tools allow for much greater functionality and flexibility, particularly in question design. We also support the integration of cutting edge user interfaces, because it will allow for the collection of detailed racial and ethnic data that reflects multiple examples of the African diaspora.

We must note, however, that while there is an advantage of utilizing new technology to curtail costs, we believe that the Bureau must not solely rely on web-based technology. Though more Americans are gaining access to broadband in their homes, recent data from our *State of Black America* (SOBA) 2014 Equality Index and Pew Research Center,<sup>1</sup> find that home broadband adoption rates for Blacks still lag behind those of whites by 12 percentage points.<sup>2</sup> For certain subgroups within our communities—the elderly, those with lower incomes and limited education—the gaps are even wider.<sup>3</sup>

Data also shows that while younger, college educated, and higher income Blacks are just as likely as their white counterparts to use the Internet and to have home broadband access, these statistics are less promising as socioeconomic status and educational attainment levels decline.<sup>4</sup>

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An exclusively web accessible Census can create access barriers to the 2020 Census questionnaire and thus compromise response rates particularly for some members of low-income communities of color. Therefore, while we support utilizing web-based designs, we also support the use of other avenues—both traditional, such as mailed paper questionnaires, enumerators and other non-broadband dependent methods.

**3. To test different options for offering non-English options**

The African diaspora is an amalgamation of diverse cultures, histories and languages. Therefore, we encourage the Bureau and OMB to support culturally relevant census materials that reflect languages spoken throughout the African diaspora. We believe that by doing so, the Bureau will be able to realize its goal of maximizing the number of non-English and English as a second language speakers that complete the 2020 questionnaires. Once again, this will allow for the collection of vital race and ethnicity data for all of our American communities.

We applaud the Bureau for undertaking this important research. In summary, we support methods to improve with-in household data throughout all populations, including in the Black community. We strongly support the adoption of a combined question that provides equity across all race and ethnic groups for self-identification and self-reporting. Finally, we encourage the Bureau to develop relevant census materials in languages spoken throughout the African diaspora.

The National Congress of Americans (NCAI), the oldest and largest representative tribal organization, commends the Census Bureau for soliciting comments from federally-recognized tribes, state-recognized tribes, and tribal and national Indian organizations. The Census provides critical national, regional, and local data for the United States and Indian Country. American Indians and Alaska Natives have a significant stake in the accuracy and outcome of the 2020 census and the American Community Survey (ACS), as segments of the Indian population experience the highest rates of poverty, unemployment, and lack of infrastructure. Moreover, tribal leaders and decision-makers need accurate data for the American Indian/Alaska Native population, one of the most undercounted populations in the history of the decennial census. NCAI supports the Census Bureau's effort to conduct an accurate count of the American Indian and Alaska Native population in the decennial census and ACS. The support and participation of all tribal leaders and Native people is critical to the ultimate success of the 2020 census. In addition, ongoing consultation with tribal leaders is essential to Census outreach and enumeration efforts and reflects the federal trust responsibility to a government-to-government relationship. Our comments are summarized below and are organized by the requested sections:

**a) Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility.**

Any new question wording or formatting warrants extensive field-testing; such a change pertaining to race, ethnicity, and Hispanic origin demands even further testing given the extensive variation and complexity of responses that stem from these questions. Such field-testing should be conducted with all populations and oversampling conducted for the hard to reach, hard to count, and small populations and subpopulations, including American Indian tribes and Alaska Native villages. Regarding the practical utility of the proposed collection of information for American Indian tribes, it is not only necessary, but an obligation of the Bureau as mandated in Executive Order 13175—Consultation and Coordination With Indian Tribal Governments—to establish regular and meaningful consultation and collaboration with tribal officials in the development of Federal policies that have tribal implications. Changes to the collection and classification of racial and ethnic responses in the decennial have the potential for significant positive or negative tribal implications and thus tribes must be formally consulted, as should American Indian and Alaska Native national advocacy organizations and the American Indian and Alaska Native representatives appointed to serve on the Census Bureau's National Advisory Committee on Racial, Ethnic and Other Populations who not only have subject matter expertise, but also significant stakeholder relationships in Indian Country. A letter sent to tribal leaders does not qualify as meaningful consultation with tribes. Tribal consultations should take place before the 2015 National Content Test goes live in order to ensure that tribes have input into any changes, especially relating to wording or format, in the proposed enumeration process of American Indian and Alaska Native populations. This is particularly important given the high, significant levels of inconsistency

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for American Indian and Alaska Native populations in the Alternative Questionnaire Experiment Program. To this end, the proposed collection of information in the 2015 Content Test is absolutely necessary, as is formal consultation with tribes and stakeholders prior to national testing.

**b) The accuracy of the agency's estimate of the burden (including hours and cost) of the proposed collection of information.**

It is reasonable to expect that a combined race and Hispanic origin question could reduce both confusion and burden amongst those who struggled with these questions in previous censuses. However, there is a significant, unintended consequence of this proposed combination that severely impacts American Indian and Alaska Native communities. When federal agencies develop guidance on how they plan to maintain, collect, and report racial and ethnic data following changes by OMB that are reflected in this Census effort, some have opted to merge categories, which prevents the disaggregation that communities rely on for planning. In addition, this can impact federal allocation of resources to tribes as many formula and other appropriations rely on agency data to inform population measures and need. Without disaggregated data, some agencies may not be delivering on their trust responsibility. Notably, when the US Department of Education released its 2007 Final Guidance on Maintaining, Collecting and Reporting Racial and Ethnic Data, the impacts across Indian Country were felt almost immediately. While the USDOE will continue to collect data on American Indian and Alaska Native (AI/AN) students whether or not they report a racial/ethnic status that is in combination with other racial/ethnic groups (e.g., Hispanic/Latino, White), the USDOE will only report AI/AN specific data for students who indicate they are not Hispanic/Latino ethnically and select only American Indian and Alaska Native as their race. American Indian/Alaska Native students who indicate that they are also Hispanic/Latino ethnically will only be reported in the Hispanic/Latino category. Regardless of whether they indicate Hispanic/Latino ethnicity, American Indian/Alaska Native students selecting an additional racial category will only be reported as multiracial. The effect is major and detrimental at local, state, and national levels as AI/AN communities have historically relied on USDOE data as a quality source of information for planning and development efforts.

The USDOE has data that it can disaggregate for AI/AN alone, AI/AN in combination with other ethnicities and races, and AI/AN alone and in combination as the Census does, but it has opted not to do so.

While combining these questions may not have a statistical impact on populations being enumerated, it has had a detrimental impact on reporting policy of federal agencies. It is imperative that the Census Bureau and OMB offer guidance on the importance of disaggregation in federal agency reporting and differentiating between race and ethnicity in these reports.

**c) Ways to enhance the quality, utility, and clarity of the information to be collected.**

**1. Race and Origin Content**

The Federal Register Notice is vague about any proposed changes to the sub question of American Indian and Alaska Native tribe that will be included in the 2015 National Content Test. The importance of the wording of the tribal sub question cannot be understated for the quality, utility, and relevance of the resulting tribal data collected. The current wording "Print name of enrolled or principal tribe" does not provide an estimate of an enrolled count of a tribal or village population though it can offer a loose approximation of those who self-affiliate. While all responses are of course collected via self-identification, self-identified enrolment status is still valuable data for tribes. Given the extensive financial burden of conducting a census, few tribes have the resources to conduct large-scale demographic surveys of their tribal populations on a routine basis. The US Census is the most robust and updated data source of our nation's population. In this light, it should endeavor to do the same for tribal-level enumeration. Further, the Department of the Interior is increasingly relying on Census data as part of its biannual report to Congress of the American Indian Population and Labor Force Report, which suggests that National Content Test should report on the quality of tribal-level aggregation.

**2. Relationship Content**

NCAI is encouraged by the re-introduction of the foster child category in enumerated households due to the high rates of foster placements of American Indian and Alaska



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Native children.

### **3. Coverage Content**

The "Question-Based Response" has the potential to improve data collection on American Indian and Alaska Native households given some of the complex and unique household compositions present in our communities as noted by the results of the AQE. However, without further information and more extensive consultation with tribal and community leaders, it is difficult to provide insight on the appropriateness of the instructions and questions being tested for American Indian and Alaska Native communities. NCAI suggests further consultation with tribal leaders on this component.

### **4. Optimizing Self-Response**

NCAI previously submitted comments on the use of internet enumeration of American Indian and Alaska Native populations (see attachment). There, we explained that American Indian and Alaska Native lands are some of the most unserved and underserved areas of the United States. When referring to Internet, broadband and wireless capability, the difference between Indian Country and the rest of the United States has commonly been referred to as the 'Digital Divide'. The Federal Communications Commission's National Broadband Plan states that Internet penetration on tribal lands is estimated at less than ten percent, while basic analog telephone service reaches about 68 percent of Indian Country. This proposed testing is essential to understand the impact of a shift away from hard copy, mail outreach to more internet enumeration on American Indian and Alaska Native populations, who typically have lower rates of access to internet and computer technology. As such, it is important that sub samples and re-interview respondents include a significant number of American Indian and Alaska Native people.

### **5. Language**

NCAI is encouraged that there are continued efforts to explore language supports for non-English speaking community members as these individuals make up a significant proportion of the American Indian and Alaska Native population. However, without further information and more extensive consultation with tribal and community leaders, it is difficult to provide insight on the appropriateness of the methods and languages being tested for American Indian and Alaska Native communities. NCAI suggests further consultation with tribal leaders on this component.

### **6. Content Reinterview**

Various components of this proposed testing are essential to understand the impact on American Indian and Alaska Native populations. As such, it is important that sub samples and re-interview respondents include a significant number of American Indian and Alaska Native people. As NCAI is often told this can be cost-prohibitive, it is critical that tribal leaders be consulted more comprehensively on the National Content Test and information about the results of consultations be made public.

#### **d) Ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other forms of information technology.**

Utilizing the Internet and other automated techniques is practical for the general collection of information from respondents across the country. It should be noted that while some American Indian reservations and Alaska Native villages are incredibly remote with limited connectivity, others have quite sophisticated IT infrastructure. This spectrum of connectivity presents both a challenge and an opportunity for data collection. The Bureau should focus on extensive outreach in American Indian and Alaska Native communities to ensure that all reservation and village residents have access to the same instrument modes as the rest of the country. Differences in instrument modes could inject bias into the data. This is especially relevant to reservation residents given their disproportionate undercount.

Additionally, one benefit identified in this Notice for the online response mode is allowing more functionality and greater flexibility in designing questions compared to the space

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constrained paper versions. Currently there is only one response box available for an American Indian or Alaska Native respondent to write their tribal affiliation. If one has multiple tribal affiliations, then one is expected to fit all of those tribal names into the one response box. This has been a constraining practice that has plagued previous censuses and inhibited accurate tribal counts. The testing of multiple response spaces for tribal affiliation is recommended.

*ASSOCIATION OF HAWAIIAN CIVIC CLUBS*

*A RESOLUTION 14-21*

SUPPORTS NATIVE HAWAIIAN AND PACIFIC ISLANDER DETAILED RACES PRINTED ON CENSUS 2020 SURVEY PANELS

WHEREAS, the U.S. Census Bureau released "Results from the 2010 Census Race and Hispanic Origin Alternative Questionnaire Experiment: Technical Briefing" (Technical Briefing) dated August 8, 2012, influences how the race groups and detailed races will be printed and displayed on the census survey panel with or without check boxes and write-in line on the next decennial census in 2020; and

WHEREAS, the primary research objectives of the Technical Briefing include:

- Increase reporting in the standard Office of Management and Budget (OMB) race and ethnic categories
- Lower item nonresponse to the race and Hispanic origin questions
- Improve the accuracy and reliability of race and ethnic data
- Elicit the reporting of detailed race and ethnic groups; and

WHEREAS, "detailed races" have been represented as checkboxes on the 2010 Census questionnaire, including the "Native Hawaiian" checkbox on the 2010 Census race question; and

WHEREAS, the Native Hawaiian & Pacific Islander group (Detailed Reporting for Select Race Groups and Hispanic Origin, pg. 49) registered the highest approval response (85.8) for the Detailed Approach with a Native Hawaiian checkbox compared to other census control panels;

and

WHEREAS, the Technical Briefing's Recommendations did not include issues that specifically pertain to the Native Hawaiian and Pacific Islander race group; and

WHEREAS, the National Advisory Committee on Racial, Ethnic and Other Populations (NAC), a program of the U.S. Census Bureau, recommended a combined question format for the 2020 Census that did not include a Native Hawaiian detailed race checkbox in its "2020 Census Race and Hispanic Origin Research Working Group, Final Report," recommendations dated June 10, 2014 (Final Report) which proposed recommendations for the Native Hawaiians and Other Pacific Islanders (NHOPI) category (Final Report, pg. 20 and 24); and

WHEREAS, community programs formed by the U.S. Census Bureau and other community organizations have had active dialog and input on the Alternative Questionnaire Experiment (AQE) issue for the past three years through formal discussions that have taken place through conference calls, national conferences, and civic organizations making recommendations that represent the diverse population and need for accurate data that represents the NHOPI detailed race group; and

WHEREAS, the NHOPI race group population increased 40% between Census 2000 and Census 2010 with Hawai'i and California registering the largest NHOPI populations in the

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U.S.; and

WHEREAS, the U.S. Census Bureau and OMB Directive No. 15 (OMB-15) identify the detailed Pacific Islander races as: Native Hawaiian (NH), Samoan, Chamorro, Carolinian, Chuukese, Fijian, Guamanian, Kosraean, Marshallese, Niuean, Palauan, Pohnpeian, Tokelauan, Tongan, and Yapese; and

WHEREAS, the authors and undersigned agrees with the AQE Technical Briefing specific to the NHOPI race group that the detailed approach as described below will achieve 1) increased reporting in the NHOPI detailed races; 2) lower item non-response from the NHOPI race group; 3) improve accuracy and reliability of NHOPI race and ethnic data; and 4) elicit reporting in the NHOPI detailed race and ethnic group; and

WHEREAS, the authors and undersigned do not agree with the NAC Working Group Final Report's Summary and Recommendations specific to the NHOPI race group; and

WHEREAS, data users need the detailed NHOPI race data because each detailed race is striving to improve the health, education, and welfare for its people, while there are different political relationships, unique languages, diverse cultural practices and identity, and different paths to achieve equity, including data equity that represents each detailed race; and

WHEREAS, Pacific Islanders new to U.S. census detailed race identifications may be confused if they do not have a visual of the detailed listing of their identity on the census survey panel, thus risking a diminished ability to achieve and execute goals and strategies stated in the Technical Briefing; and

WHEREAS, the U.S. Census Bureau projects extensive use of the Internet and electronic Census 2020 survey panels for much of the process that would eliminate the need to reduce space on paper panels by printing the detailed races included in the NHOPI race group;

NOW, THEREFORE BE IT RESOLVED by the Association of Hawaiian Civic Clubs at its 55TH annual convention at Waikoloa, Hawai'i this 151 day of November 2014, that it SUPPORTS NATIVE HAWAIIAN AND PACIFIC ISLANDER DETAILED RACES PRINTED ON CENSUS 2020 SURVEY PANELS; and

BE IT FURTHER RESOLVED, that the U.S. Census Bureau and Office of Management and Budget provide Census 2020 survey panels that will increase reporting, lower non-response from the NHOPI population, improve accuracy and reliability of the NHOPI detailed race group data, elicit reporting in the NHOPI detailed race and ethnic group; and

BE IT FURTHER RESOLVED, that a certified copy of this resolution be given to [redacted].

The undersigned hereby certifies that the foregoing Resolution was duly adopted on the 1<sup>st</sup> day of November 2014, at the 55<sup>th</sup> Annual Convention of the Association of Hawaiian Civic Clubs at Waikoloa, South Kohala, Hawai'i

The Pacific American Community Cultural Center (PACCC), is a 501(c)3 non-profit, member organization based group in the State of California that serves the Native Hawaiian and other Pacific Island communities. We appreciate the opportunity to respond to the proposed information collection published by the Census Bureau on December 2, 2014 at 79 Federal Register 71377 which seeks input on the upcoming 2015 National Content Test (NCT). We offer the attached as ways to enhance the quality, and clarity of the information to be collected; and ways to minimize the burden of the collection of information on the respondents, including through the use of automated collection techniques or other forms of information and technology.

Our member organizations represent all Pacific Islanders in the Southern California region. The Los Angeles CSA has the largest number of NHPI of any CSA in the continental United States. The region also has the largest number of Native Hawaiians, and Guamanian or Chamorro and Samoan Americans on the continent. It has the third-largest population of Tongan Americans of any CSA on the continent.

We are gravely concerned that the "combined question" approach that eliminates detailed race check boxes for Native Hawaiian and Pacific Island (NHPI) communities is not

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equitable and represents a step back from the 2010 Census and threatens the accurate collection of our communities' data. While the NCT will test detailed checkbox screens, it will be limited to "internet-only" and will not accurately capture our NHPI community's members, many of whom do not have readily available access to internet connected devices or the language skills to accurately respond.

Although the Native Hawaiian and Pacific Islanders share many values in their cultures, they all have significantly different needs when it comes to health, income, language and education. These are all important factors for successful integration into American culture. We also retain the connections to our homeland and specifically our cultural identity. Who is our community? One box does not accurately capture the many diverse cultural differences in the NHPI community.

We conducted training in the community at large for the 2010 Census and realized a very large return for our effort, as is captured in the recently released, California NHPI Demographic Profile. If you change the reporting and combine all of us we will not be able to accurately portray our communities' needs. These numbers are crucial to the health and wellbeing of our different communities.

We look forward to continuing to engage with the U.S. Census Bureau on this and other issues that have a direct impact on our NHPI communities.

#### I. Race and Origin Content

Asian Americans and Native Hawaiian and Pacific Islanders (NHPIs) are among our nation's fastest growing and most diverse racial groups. Often viewed as homogenous, these communities include more than 50 detailed subgroups that can differ dramatically across key social and economic indicators. Without accurate data by detailed subgroup, some of the most disadvantaged in our communities are rendered invisible to policy makers, leaving their critical needs unmet. Through the decennial census, American Community Survey, and other national surveys, the Census Bureau stands as the single most important source of disaggregated data, currently providing data on the size and characteristics of 24 Asian American and 22 NHPI detailed subgroups. Maintaining or improving upon

the quality of these detailed data is essential to informed public policy on our communities and the fair allocation of federal, state, and local funding.

Testing thus far suggests some changes being considered would result in decreased detailed race reporting among Asian Americans and NHPIs. As results of the 2015 National Content Test will help guide the Census Bureau's decision-making, and represents the last major testing opportunity before decisions must be made, it is critical that all steps are taken to address the consistent decrease in

detailed race reporting among Asian Americans and NHPIs seen across different tests.

#### A. Key Principles for 2020 Census

We believe the following overarching principles should guide the Census Bureau as it moves forward with its efforts on determining the race and ethnicity questions for the 2020 census. In many of our conversations and in the design proposals for testing variations in the measure of race and ethnicity, the Census Bureau has noted "balance," "equity," and "symmetry" as central tenets of this effort.

However, this approach overlooks two other important, and fundamental, tenets that are centrally important for Census data collection on the race and ethnicity of U.S. persons:

- 1) Ensuring that we do not move backwards from the detailed reporting achieved in the 2010 Census, which should serve as the baseline for effective practice and;
- 2) Ensuring the accuracy of the data collected.

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*Principle #1: 2010 Census as a Baseline for Effective Practice - We cannot go backwards*

Any data collected in future census must meet the standard already achieved in 2010. This is a minimum or floor, with the hopes that future efforts can build on this foundation. We cannot go backwards in terms of the quality of detailed data collected on Asian American and NHPI groups. In order to honor this principle, we recommend the following practices:

- **A maximum number of check boxes should be included, with the number used during the 2010 Census serving as a minimum** - Check boxes capturing detailed race groups improve detailed race reporting and should be utilized for all race groups, regardless of whether or not the race and Hispanic origin questions are combined.;
- **A maximum number of examples should be included, with the number used during the 2010 Census serving as a minimum** - Examples are critical in soliciting detailed race reporting from detailed race groups not represented by check boxes and should also be utilized;
- **NHOPI response options should be clearly identified separate from Asian American response options** – Increasing the visibility of NHOPI response options will help promote their detailed race reporting, which was particularly low during the 2010 Census.

Any further testing should:

- Keep (at a minimum) the practice of having 6 separate check boxes for Asian sub-categories and 3 separate check boxes for Pacific Islander sub-categories.
- “Other Asian” and “Other Pacific Islander” categories should be included, with listings of the same number of examples used in the 2010 Census (at a minimum, 5 for Other Asian American and 2 for Other Pacific Islander).
- Improve upon this baseline, e.g. increasing the number of check boxes and listing of examples, not decreasing these options.

*Principle #2: Accuracy*

Without accurate data by detailed subgroup, the diversity in the Asian American and NHPI communities means some of the most disadvantaged in our communities are rendered invisible to policy makers, leaving their critical needs unmet. In reviewing proposed research panels, we observed that the proposed formats decreased both the number of separate checkboxes and listings of examples for Asian American and NHPI race groups compared to Census 2010 – practices that have been demonstrated by research to be both ineffective and a threat to accuracy. The most recent AQE testing results<sup>1</sup> confirm that:

- **Removing check boxes used to capture detailed race groups also decreased the amount of detailed race reporting among Asian Americans.** Indeed, these formats yielded the lowest detailed race reporting among Asian Americans of any format tested.

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- **Removing a subgroup or national origin from the list of examples for each broad race category reduced reporting for that group.** Testing conducted as part of the 2005 National Census Test2 suggests that limiting or removing the list of examples has a negative impact on detailed reporting.

In addition to the recommendations above regarding check boxes and examples, we recommend the following to ensure more accurate data on the Asian American and NHPI communities:

- **Oversampling Asian Americans and NHPs by ethnic group in future testing protocols**, ensuring an adequate sample of both large and small groups across all panels;
- **Providing adequate Asian and Pacific Island language assistance** to ensure meaningful responses from limited-English proficient Asian Americans and NHPs and to ensure results are not biased by English-fluent respondents.

B. Question Format

1. Separate race and origin questions

We support the continued testing of the separate race and origin questions. This format continues to provide the best detailed reporting on Asian American, NH and PI groups and is our preferred method of data collection on race and ethnicity so long as the detailed reporting remains higher with this format. **Preservation of the NH checkbox (stand-alone) is consistent with Census' 2000**

**and 2010.**

2. Combined question with checkboxes and write-ins on same screen Because the Census Bureau is not planning to test a combined question that provides specific group checkboxes for Asian Americans and NHPs in its paper version, we are concerned that by testing and adopting these design practices, the Census Bureau is introducing new barriers for Asian American populations that did not exist before that will certainly harm the accuracy of the data being collected.

Additionally, the manner in which data is collected for both large and small groups must address the accuracy needs of both. Given the historical opportunity that the 2020 Census presents to accurately capture America's changing racial and ethnic demographics – we cannot waste time or resources in retesting bad designs and creating new barriers to accuracy in detailed reporting.

Thus, we are concerned with potential biases that may be introduced when check-boxes for detailed subgroups are only offered on the internet-based version of the Census form (Gonzalez 2014; Collins et al. 2014; Choi and DiNitto 2013). Even in recent years, as access to technology has increased dramatically, there are still barriers to access for the elderly and low-income people.

Understanding the effects of this divide is critical given that Census data is used to ensure political representation as well as healthcare services, in-language job training centers, and senior care centers (US Bureau of the Census 2010).<sup>4</sup> Although internet-surveys are increasingly popular, response rates tend to be lower using this method than traditional survey methods, potentially biasing results (Fan and Yan 2010; Shih and Fan 2008).<sup>5</sup> Extrapolating from past research, we can assume that those who are elderly, lowincome, and less English-language proficient will be least likely to access the internet-based survey.

These are the very populations within the Asian American and NHPI communities that we hope would have the option to fill out a detailed subgroup checkbox, but that will be more likely to access a paper version of the Census form (which will not include the detailed subgroup check-box option). NH colleagues fear that if the data is collected by aggregated race identifiers, then data will be

published and reported in the same manner, by example of collection. By reporting aggregated NHPI data, it further marginalizes all the detailed race populations covered within

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this race identifier. NH and PI health, education and welfare needs are dissimilar by reason of political relationship and different historical experience with the U.S. federal government. Disaggregated collection and reporting is the only way needs can be addressed for these populations.

We encourage you to include the same version of the Census questions on race on both the paper and internet versions of the survey so that any differences in the likelihood of providing detailed subgroup information can be properly attributed (i.e. to question format or to form medium). With regard to these concerns, we make the following recommendations:

- 1) Collect data on which AANHPI subgroups are the least likely to fill out the Census form on the internet (refusal rates by subgroup)
- 2) Collect data on whether refusals vary by age and English-language proficiency; if these data are available, provide information to the public about refusal rates by English-language proficiency and ethnic subgroups
- 3) Preserve the stand-alone “Native Hawaiian” checkbox as presented in Census 2000 and 2010 paper versions.

A significant proportion of AANHPIs are not English-language proficient and their participation in the testing will be reduced by any design that does not include Asian languages. We encourage you to make every effort to include outreach and information related to the September testing in-language and request that you share your plan for outreach and how the Census will collect and record data on refusals/non-respondents. Finally, we ask that you share your plan for recruiting Native Hawaiian/Pacific Islanders into the September 2015 tests. Without their inclusion, it is impossible to understand how changes to the Census will affect these smaller, often non-English proficient, groups.

3. Combined question with checkboxes and write-ins on separate screens (Internet-only)

It will be important to provide maximum number of examples, with the number used during the 2010 Census serving as a minimum. Examples are critical in soliciting detailed race reporting from detailed race groups. The checkboxes and examples utilized in the 2010 Census should be offered on the first screen and subsequent screens for Asian Americans and NHPs.

4. Combined question branching with detailed checkbox screens (Internet-only)

A maximum number of check boxes should be included in the branching detailed checkbox screens, with the number used during the 2010 Census serving as a minimum. A maximum number of examples should be included for the write-in option, with the number used during the 2010 Census serving as a minimum.

C. Race Response Categories

We support the testing of a separate MENA category.

II. Coverage Content (Internet Only)

Efforts to test ways to improve accurate within-household coverage are important as our nation becomes more and more complex. As the Census Bureau itself notes, the household structure has been diversifying in this country as a result of demographic trends such as: increases in immigration rates and the proportion of the population that is foreign born; changing migration streams now coming predominantly from Asia and Latin America, rather than from Europe; increases in cohabitation and blended families due to more divorces and remarriages; increases in the proportions of co-habitor households with children; and dramatic increases in grandparent-maintained households and nonrelative households. It will be important to ensure we have an accurate count of each household. At the same time, it is important to note that some of the factors that may make a household more complex will mean that the household is less likely to have access to the internet, such as a poorer household or a more heavily-immigrant, limited

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English-proficient household. To that extent, efforts to test coverage content through other means beyond the internet will be important to explore.

### III. Optimizing Self Response

We believe the focus of optimizing self-response should be about optimizing the self-response of hard to count populations. As noted in the notice, the Census Bureau has found depressed self response rates among certain respondents/areas with lower Internet usage. This testing is important to ensure that our communities are properly engaged in this effort. The Census Bureau should not just rely on internet access by traditional broadband means but should develop a strong mobile platform for response to help address disparities in broadband use between racial/ethnic and socio-economic groups. The Census Bureau should also study the results of this testing across different racial, ethnic and subgroup groupings as well as by owner versus renter and by age

### IV. Language

We are concerned that the notice does not detail the “additional options for non-English speakers to complete the questionnaires.” There are more than 800 spoken Asian languages and dialects. According to the 2013 ACS 5-year estimates, over seventy-five percent of Asians speak a language other than English at home and nearly 1 out of 3 are limited English-proficient (LEP) – that is, speak English “less than very well”, creating quite a challenge in information dissemination efforts. In addition, older generation immigrants have a different adaptation rate when it comes to speaking/understanding the English language.

Without more detail we can only assume that the Census Bureau's plans to provide language assistance to the many limited-English people that need help filling out their forms outside of Spanish is not fully developed. Lack of English fluency is a real barrier in getting many limited English proficient persons to fill out their surveys. The Census Bureau's own focus group research leading into the last census found that Asian Americans believed that lack of in-language questionnaires and lack of English language fluency were among the major barriers to having greater participation in the census among the Asian American communities.

Similar to the Census Bureau's efforts to include in-language messages in the 2010 Census Advance Letter, the Census Bureau should test including in-language messaging to optimize self-responses in additional Asian languages. The Census Bureau should target language minority communities not just by the size of Limited English Proficient community but also for those groups that have the highest LEP rates and high levels of "linguistically isolated" households, which may represented smaller groups but ones with huge needs. The Census Bureau must also ensure that its translations are of high quality, easily understood in language, and do not inadvertently offend the language community. The Census Bureau should establish and share a systematic process for high quality and accurate translations for both questionnaires (and the subsequent communications campaign) that includes identifying and utilizing appropriate partners. Messaging developed must be easily translated into other languages and the Census Bureau should engage appropriate partners through its partnership program to review messaging for efficacy, including cultural appropriateness.

### V. Conclusion

We hope these comments are helpful to the Census Bureau as it finalizes its plans for the 2015 Content Test. We are happy to discuss any of these topics in greater detail and appreciate the opportunity to comment in the first instance. Please feel free to contact us at [contact information] if you have any further questions.

[Multiple Submissions]

### I.Race and Origin Content

Asian Americans and Native Hawaiian and Pacific Islanders (NHPs) are among our nation's fastest growing and most diverse racial groups. Often viewed as homogenous, these communities include more than 50 detailed subgroups that can differ dramatically across key social and economic indicators. Without accurate data by detailed subgroup, some of the most disadvantaged in our communities are rendered invisible to policy makers, leaving their critical needs unmet. Through the decennial census, American Community



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Survey, and other national surveys, the Census Bureau stands as the single most important source of disaggregated data, currently providing data on the size and characteristics of 24 Asian American and 22 NHPI detailed subgroups. Maintaining or improving upon

the quality of these detailed data is essential to informed public policy on our communities and the fair allocation of federal, state, and local funding.

Testing thus far suggests some changes being considered would result in decreased detailed race reporting among Asian Americans and NHPIs. As results of the 2015 National Content Test will help guide the Census Bureau's decision-making, and represents the last major testing opportunity before decisions must be made, it is critical that all steps are taken to address the consistent decrease in

detailed race reporting among Asian Americans and NHPIs seen across different tests.

A. Key Principles for 2020 Census

We believe the following overarching principles should guide the Census Bureau as it moves forward with its efforts on determining the race and ethnicity questions for the 2020 census. In many of our conversations and in the design proposals for testing variations in the measure of race and ethnicity, the Census Bureau has noted "balance," "equity," and "symmetry" as central tenets of this effort.

However, this approach overlooks two other important, and fundamental, tenets that are centrally important for Census data collection on the race and ethnicity of U.S. persons:

- 1) Ensuring that we do not move backwards from the detailed reporting achieved in the 2010 Census, which should serve as the baseline for effective practice and;
- 2) Ensuring the accuracy of the data collected.

*Principle #1: 2010 Census as a Baseline for Effective Practice - We cannot go backwards*

Any data collected in future census must meet the standard already achieved in 2010. This is a minimum or floor, with the hopes that future efforts can build on this foundation. We cannot go backwards in terms of the quality of detailed data collected on Asian American and NHPI groups. In order to honor this principle, we recommend the following practices:

- **A maximum number of check boxes should be included, with the number used during the 2010 Census serving as a minimum** - Check boxes capturing detailed race groups improve detailed race reporting and should be utilized for all race groups, regardless of whether or not the race and Hispanic origin questions are combined.;
- **A maximum number of examples should be included, with the number used during the 2010 Census serving as a minimum** - Examples are critical in soliciting detailed race reporting from detailed race groups not represented by check boxes and should also be utilized;
- **NHOPI response options should be clearly identified separate from Asian American response options** – Increasing the visibility of NHOPI response options will help promote their detailed race reporting, which was particularly low during the 2010 Census.

Any further testing should:

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- Keep (at a minimum) the practice of having 6 separate check boxes for Asian sub-categories and 3 separate check boxes for Pacific Islander sub-categories.
- “Other Asian” and “Other Pacific Islander” categories should be included, with listings of the same number of examples used in the 2010 Census (at a minimum, 5 for Other Asian American and 2 for Other Pacific Islander).
- Improve upon this baseline, e.g. increasing the number of check boxes and listing of examples, not decreasing these options.

*Principle #2: Accuracy*

Without accurate data by detailed subgroup, the diversity in the Asian American and NHPI communities means some of the most disadvantaged in our communities are rendered invisible to policy makers, leaving their critical needs unmet. In reviewing proposed research panels, we observed that the proposed formats decreased both the number of separate checkboxes and listings of examples for Asian American and NHPI race groups compared to Census 2010 – practices that have been demonstrated by research to be both ineffective and a threat to accuracy. The most recent AQE testing results<sup>1</sup> confirm that:

- **Removing check boxes used to capture detailed race groups also decreased the amount of detailed race reporting among Asian Americans.** Indeed, these formats yielded the lowest detailed race reporting among Asian Americans of any format tested.
- **Removing a subgroup or national origin from the list of examples for each broad race category reduced reporting for that group.** Testing conducted as part of the 2005 National Census Test<sup>2</sup> suggests that limiting or removing the list of examples has a negative impact on detailed reporting.

In addition to the recommendations above regarding check boxes and examples, we recommend the following to ensure more accurate data on the Asian American and NHPI communities:

- **Oversampling Asian Americans and NHPs by ethnic group in future testing protocols**, ensuring an adequate sample of both large and small groups across all panels;
- **Providing adequate Asian and Pacific Island language assistance** to ensure meaningful responses from limited-English proficient Asian Americans and NHPs and to ensure results are not biased by English-fluent respondents.

B. Question Format

1. Separate race and origin questions

We support the continued testing of the separate race and origin questions. This format continues to provide the best detailed reporting on Asian American, NH and PI groups and is our preferred method of data collection on race and ethnicity so long as the detailed reporting remains higher with this format. **Preservation of the NH checkbox (stand-alone) is consistent with Census’ 2000**

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**and 2010.**

2. Combined question with checkboxes and write-ins on same screen Because the Census Bureau is not planning to test a combined question that provides specific group checkboxes for Asian Americans and NHPIs in its paper version, we are concerned that by testing and adopting these design practices, the Census Bureau is introducing new barriers for Asian American populations that did not exist before that will certainly harm the accuracy of the data being collected.

Additionally, the manner in which data is collected for both large and small groups must address the accuracy needs of both. Given the historical opportunity that the 2020 Census presents to accurately capture America's changing racial and ethnic demographics – we cannot waste time or resources in retesting bad designs and creating new barriers to accuracy in detailed reporting.

Thus, we are concerned with potential biases that may be introduced when check-boxes for detailed subgroups are only offered on the internet-based version of the Census form (Gonzalez 2014; Collins et al. 2014; Choi and DiNitto 2013). Even in recent years, as access to technology has increased dramatically, there are still barriers to access for the elderly and low-income people.

Understanding the effects of this divide is critical given that Census data is used to ensure political representation as well as healthcare services, in-language job training centers, and senior care centers (US Bureau of the Census 2010).<sup>4</sup> Although internet-surveys are increasingly popular, response rates tend to be lower using this method than traditional survey methods, potentially biasing results (Fan and Yan 2010; Shih and Fan 2008).<sup>5</sup> Extrapolating from past research, we can assume that those who are elderly, lowincome, and less English-language proficient will be least likely to access the internet-based survey.

These are the very populations within the Asian American and NHPI communities that we hope would have the option to fill out a detailed subgroup checkbox, but that will be more likely to access a paper version of the Census form (which will not include the detailed subgroup check-box option). NH colleagues fear that if the data is collected by aggregated race identifiers, then data will be

published and reported in the same manner, by example of collection. By reporting aggregated NHPI data, it further marginalizes all the detailed race populations covered within this race identifier. NH and PI health, education and welfare needs are dissimilar by reason of political relationship and different historical experience with the U.S. federal government. Disaggregated collection and reporting is the only way needs can be addressed for these populations.

We encourage you to include the same version of the Census questions on race on both the paper and internet versions of the survey so that any differences in the likelihood of providing detailed subgroup information can be properly attributed (i.e. to question format or to form medium). With regard to these concerns, we make the following recommendations:

- 1) Collect data on which AANHPI subgroups are the least likely to fill out the Census form on the internet (refusal rates by subgroup)
- 2) Collect data on whether refusals vary by age and English-language proficiency; if these data are available, provide information to the public about refusal rates by English-language proficiency and ethnic subgroups
- 3) Preserve the stand-alone “Native Hawaiian” checkbox as presented in Census 2000 and 2010 paper versions.

A significant proportion of AANHPIs are not English-language proficient and their participation in the testing will be reduced by any design that does not include Asian languages. We encourage you to make every effort to include outreach and information related to the September testing in-language and request that you share your plan for outreach and how the Census will collect and record data on refusals/non-respondents Finally, we ask that you share your plan for recruiting Native Hawaiian/Pacific Islanders into the

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September 2015 tests. Without their inclusion, it is impossible to understand how changes to the Census will affect these smaller, often non-English proficient, groups.

3. Combined question with checkboxes and write-ins on separate screens (Internet-only)

It will be important to provide maximum number of examples, with the number used during the 2010 Census serving as a minimum. Examples are critical in soliciting detailed race reporting from detailed race groups. The checkboxes and examples utilized in the 2010 Census should be offered on the first screen and subsequent screens for Asian Americans and NHPs.

4. Combined question branching with detailed checkbox screens (Internet-only)

A maximum number of check boxes should be included in the branching detailed checkbox screens, with the number used during the 2010 Census serving as a minimum. A maximum number of examples should be included for the write-in option, with the number used during the 2010 Census serving as a minimum.

C. Race Response Categories

We support the testing of a separate MENA category.

II. Coverage Content (Internet Only)

Efforts to test ways to improve accurate within-household coverage are important as our nation becomes more and more complex. As the Census Bureau itself notes, the household structure has been diversifying in this country as a result of demographic trends such as: increases in immigration rates and the proportion of the population that is foreign born; changing migration streams now coming predominantly from Asia and Latin America, rather than from Europe; increases in cohabitation and blended families due to more divorces and remarriages; increases in the proportions of co-habitor households with children; and dramatic increases in grandparent-maintained households and nonrelative households. It will be important to ensure we have an accurate count of each household. At the same time, it is important to note that some of the factors that may make a household more complex will mean that the household is less likely to have access to the internet, such as a poorer household or a more heavily-immigrant, limited English-proficient household. To that extent, efforts to test coverage content through other means beyond the internet will be important to explore.

III. Optimizing Self Response

We believe the focus of optimizing self-response should be about optimizing the self-response of hard to count populations. As noted in the notice, the Census Bureau has found depressed self response rates among certain respondents/areas with lower Internet usage. This testing is important to ensure that our communities are properly engaged in this effort. The Census Bureau should not just rely on internet access by traditional broadband means but should develop a strong mobile platform for response to help address disparities in broadband use between racial/ethnic and socio-economic groups. The Census Bureau should also study the results of this testing across different racial, ethnic and subgroup groupings as well as by owner versus renter and by age

IV. Language

We are concerned that the notice does not detail the “additional options for non-English speakers to complete the questionnaires.” There are more than 800 spoken Asian languages and dialects. According to the 2013 ACS 5-year estimates, over seventy-five percent of Asians speak a language other than English at home and nearly 1 out of 3 are limited English-proficient (LEP) – that is, speak English “less than very well”, creating quite a challenge in information dissemination efforts. In addition, older generation immigrants have a different adaptation rate when it comes to speaking/understanding the English language.

Without more detail we can only assume that the Census Bureau's plans to provide language assistance to the many limited-English people that need help filling out their forms

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outside of Spanish is not fully developed. Lack of English fluency is a real barrier in getting many limited English proficient persons to fill out their surveys. The Census Bureau's own focus group research leading into the last census found that Asian Americans believed that lack of in-language questionnaires and lack of English language fluency were among the major barriers to having greater participation in the census among the Asian American communities.

Similar to the Census Bureau's efforts to include in-language messages in the 2010 Census Advance Letter, the Census Bureau should test including in-language messaging to optimize self-responses in additional Asian languages. The Census Bureau should target language minority communities not just by the size of Limited English Proficient community but also for those groups that have the highest LEP rates and high levels of "linguistically isolated" households, which may represent smaller groups but ones with huge needs. The Census Bureau must also ensure that its translations are of high quality, easily understood in language, and do not inadvertently offend the language community. The Census Bureau should establish and share a systematic process for high quality and accurate translations for both questionnaires (and the subsequent communications campaign) that includes identifying and utilizing appropriate partners. Messaging developed must be easily translated into other languages and the Census Bureau should engage appropriate partners through its partnership program to review messaging for efficacy, including cultural appropriateness.

V. Conclusion

We hope these comments are helpful to the Census Bureau as it finalizes its plans for the 2015 Content Test. We are happy to discuss any of these topics in greater detail and appreciate the opportunity to comment in the first instance. Please feel free to contact us at [contact information] if you have any further questions.

I am writing to offer comments on the U.S. Census Bureau's 2015 National Content Test, 79 FR 71377.

(a) Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility;

It is my professional opinion that any new format and/or wording of a question about race and/or Hispanic ethnicity must be pretested extensively. People's answers to these questions can differ depending on the wording and format and we need to understand this variation before collecting the decennial census data. Therefore I believe that the proposed collection of information is practical and necessary.

A number of Census Bureau studies have found, over the years, that the race question is difficult for Hispanics to answer because they think of Hispanic as a race category. Thus it seems to support the function of the decennial census (to accurately enumerate all people) to pretest a question that provides a Hispanic answer category within the same question as the traditional race categories. This is likely to have practical results in that the non-response rate for Hispanics can be expected to decline and thus we will have more respondent-provided answers and less need for non-response imputation.

(b) the accuracy of the agency's estimate of the burden (including hours and cost) of the proposed collection of information;

Combining the race and Hispanic origins questions into a single question could reduce the cognitive burden on people who previously had trouble answering the separate questions.

(c) ways to enhance the quality, utility, and clarity of the information to be collected; and The specific wording of the sub-question about American Indians' tribal affiliation will be very influential on the quality and type of information collected. There has been very extensive non-response to this question in recent decennial censuses, which implies that the current version is problematic. Also, the phrase "enrolled or principal tribe" does not allow tribal governments to know whether people are enrolled or just think of themselves as affiliated. The information gathered in the tribal affiliation sub-question would be much more useful and high-quality and beneficial to American Indian tribes if the question asked for "principal tribe" and then had a separate, follow up question of "are you enrolled in this tribe? yes/no". This would not be a burdensome addition to an

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internet test.

As mentioned above, it is vitally important to pretest all changes to the race and Hispanic origin questions. Specifically, it is possible that any change to the tribal affiliation sub-question will impact respondents' decisions about whether or not to report their American Indian heritage as a race (as opposed to thinking of it as family background only).

(d) ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other forms of information technology.

The use of an internet form is a good idea for most people. American Indian reservations are often treated differently in terms of enumeration. The Census Bureau should prioritize outreach on reservations so that residents can use the same kinds of questionnaire formats offered to the rest of the country. Differences in questionnaire format can cause differences in answers, thus introducing bias into results.

On behalf of Cook Inlet Housing Authority (CIHA), I appreciate this opportunity to submit comment on the above referenced notice issued by the Department of Commerce ("the Department"). The Department is seeking comment on information collection related to the U.S. Census Bureau's 2015 National Content Test (NCT).

We believe that the proposed data collection may seek to collect information that will not have practical utility to the Department or the Census Bureau. We are grateful for the opportunity to articulate our concerns and suggest ways to enhance the quality, utility, and clarity of the information to be collected. Preventing the Exclusion of Alaska Native Tribal Members from Special Tabulations. According to the Census Bureau, the 2015 National Content Test (NCT) is a continuation of ongoing testing activities to research innovative methods for reducing the cost of the 2020 Census, while maintaining a high quality census. The testing helps the Census Bureau develop a census that is cost-effective, improves coverage, and reduces operational risk. The results will inform planning decisions that will guide the design of the 2020 Census. One of the primary objectives of the 2015 National Content Test is to evaluate and compare different census content, including content related to race. The 2010 Decennial Census asked respondents who self-identified as American Indian or Alaska Native to name their "enrolled or principal tribe." Cook Inlet Housing Authority and many other tribal housing providers in Alaska are deeply concerned that the manner in which this question is asked, if changed, will inadvertently gather information that is of little utility due to its poor quality and lack of clarity.

The tribal status of Alaska Native peoples is unique. Historically, most Alaska Natives identified along ethnic lines as being, for example, Aleut, Tlingit, or Yupik. It was not until the 1970s that the

land claims of Alaska's indigenous peoples were settled, resulting in the creation of regional and village corporations with Alaska Native shareholders. Federal recognition of Alaska tribes did not occur until the 1990s, a process that resulted, in many instances, in tribes being formally recognized on the basis of the proximity of a specific group of people to a particular village or geographic area. Sometimes, those people were not connected by shared ancestry, history, or culture; rather, the manner in which the federal government recognized Alaska's tribes was in some circumstances an artificial construct.

Because of this unique and complex history, members of Alaska tribes may, when asked to identify their tribe, "tribal affiliation," "principally enrolled tribe," or similar tribal status, respond by identifying themselves in a variety of ways. Some may identify the tribe of which they are a member. Some may identify the regional or village corporation of which they are a shareholder. Many will identify in a traditional manner as being, for example, Aleut, Tlingit, or Yupik. Alaska Native elders, for example, often identify ethnically when asked about their "tribe" – even when they are tribal members.

This phenomenon was apparent at a recent Alaska Native forum on tribal issues. An elder in the audience stood to speak, identifying himself as being seventy-one years old. "It makes no sense to me," he explained, "the way that Native people [in Alaska] must identify these days. Is being a shareholder what makes us Native? Being a member of a village? The names of our tribes were just taken from many different places and used for all the people who lived nearby. What happened to being Tlingit? This is how I think of

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myself.”

Recent focus groups held by the Census Bureau at a conference of the Alaska Federation of Natives appeared to confirm that Alaska Natives who are tribal members are at risk of being excluded from special tabulations intended to gather data on tribal enrollment or membership. Despite the fact that Alaska Natives who identify in this manner are usually tribal members or shareholders, there is a significant risk that they may not be counted as tribal members for the purposes of a particular federal program. Were a federal agency to allocate funding, for example, on the basis of the number of respondents who name a federally-recognized tribe in response to a tribal enrollment question, the result would be the misallocation of federal resources based upon flawed data. The harm to Alaska Native tribal members would be significant.

For many years, the United States Census Bureau has responded to the concerns of Alaska Native peoples regarding this issue. Thoughtfully, the Census Bureau recognizes Alaska Natives who primarily identify along ethnic lines (e.g. Haida, Inupiaq, Athabaskan, etc.) when asked about their tribal affiliation, preventing a potentially significant undercount of Alaska Native tribal members. This approach must be maintained going forward, and we respectfully request that any data collection through the 2015 National Content Test that deviates from this approach be removed because of its limited utility, low quality, and lack of clarity.

On behalf of Cook Inlet Housing Authority, thank you for the opportunity to comment on the above referenced notice.

[Multiple Submissions]

In recognition of the need to ensure a complete count of every person in the United States every ten years through the Decennial Census, we the undersigned organizations (see page 2) are writing to submit our comments for the Federal Register Notice by the Commerce Department, Proposed Information Collection; Comment Request; 2015 National Content Test.

Specifically, we are writing to express our strong support for the combined race and ethnicity question option the U. S. Census Bureau is testing through the 2015 National Content Test (NCT) for the 2020 Decennial Census. We believe such a change will significantly increase the response rate by Black population respondents of African, African American, Afro-Latino and Caribbean ethnicity and heritage. Further, the proposed form for 2020 Decennial Census with a combined race/ethnicity question creates a fair and equitable way for ALL groups to write in their country of origin if they wish to differentiate in their self-reporting.

The National Coalition on Black Civic Participation, in partnership with the Institute of Caribbean Studies, has convened its Unity Diaspora Coalition to work together to help ensure the Black population is represented in the planning and execution of the 2020 Decennial Census. The Unity Diaspora Coalition (UDC) is a non-partisan, broad-based coalition of census stakeholders representing national and state-based organizations. Many of the UDC member organizations served as partners to assist the Census Bureau in achieving a successful 2010 Decennial Census that had one of the highest response rates in recent history and many plan to partner with the Census Bureau for the 2020 Decennial Census.

The UDC believes that the combined question option (printed and online) will provide more detailed data that is beneficial for a myriad of critical public and private sector purposes, which are vital to all of the American people in determining such issues as: 1) expanding business development opportunities; 2) providing adequate funding for infrastructure, programs and services in communities across the country (urban and rural); 3) providing accurate data for reapportionment and redistricting of congressional districts by states; and 4) assist in having accurate data for monitoring the enforcement of civil rights laws. Further, we know that the Census Bureau will review this issue at upcoming hearings and respectfully ask that the Bureau include our letter in the official hearing record.

In addition, as the Census Bureau enters the digital age in its effort to stay within federal budget constraints by using an online process for self-response for 2020 census count, it is vitally important that this online process does not leave behind many in our community who do not have access to a computer or a smartphone. We strongly recommend that

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adequate funds will be in place to ensure the door to door process remains intact to reach hard to count communities.

Thank you for the opportunity to provide our comments. Please accept the above written comments on behalf of the Unity Diaspora Coalition member organizations listed below.

I am writing to express my position of being AGAINST this change to the 2020 census, adding MENA. Personally, I'm against the census bureau asking anyone what their ethnic background is. If we are all "equal Americans", then any question regarding ethnic backgrounds is insulting. The 2010 census had the opportunity to ask about job loss, unemployment, mortgage problems, etc., but instead it was more concerned about whether I was of Spanish decent, etc. Again, an insult to those of us who have paid taxes to this country for decades and trace their family roots back to the beginnings of this great nation. I hope you will not add MENA to the 2020 census. It will simply be one more insult from my government.

My name is [redacted] and I am the outgoing president of the Amazigh Cultural Association in America, an organization of more than one hundred people. I am writing you to convey the concern of our membership regarding the suggestion from the NCAAC organization concerning the classification of Imazighen as a subgroup of Arabs which we are not. The attached letter is our official response. The Arab American organizations do not speak for Imazighen nor for North Africans in general. We are of North African Amazigh origins and it is our right to speak for ourselves.

The vast majority of the people of North Africa (Mauretania, Morocco, Algeria, Tunisia and Libya) consider themselves Imazighen (plural of Amazigh) even when they do not practice the language Tamazight in their daily lives. In addition Imazighen can be found living and practicing their culture and language in Mali, Niger and even in the Canary Islands (part of Spain) and in the Oasis of Siwa in Egypt. A growing immigration of Imazighen to North America is making more Americans aware of the true identity of North Africans.

Of the 90 Million or more living today in the countries that form North Africa, more than 40 millions continue to use their language even when the governments of Morocco, Algeria, Lybia and Tunisia want to impose the Arabic language on them.

There was a small number of Arabs who came to North Africa in the 7th and then 11th century to convert Imazighen to Islam (Imazighen during those time were either non religious or were Christians (e.g. the famous Saint Augustine) or Jewish. But even if some converted to Islam, they continued to follow their Amazigh culture and traditions, and especially using Tamazight as their preferred language. Therefore, we do not consider ourselves as Arabs.

The people of North Africa should not be considered as part of the Middle East. In addition, the people of North Africa in their vast majority are Imazighen (Berbers), speaking Tamazight (the Amazigh language). Therefore, a new classification in the census form is needed to identify the vast majority of the people coming to the United States from North Africa, as Imazigen (Berber) on their own right and not as a subsection of some other culture or people to which they do not belong to.

I look forward to seeing the new Census Form reflect the reality of the true identity of North Africans who come to settle in the United States of America: Imazighen (Berbers).

[Multiple Submissions]

We are writing in a response to an initiative by some Arab Americans to reclassify the population from origins in the Middle East and North Africa ("MENA" region) as "Arab." It is highly concerning when one ethnic group "Arab" is organized to include sub-national and ethnic groups who are referred to as minorities. These "minority" groups, including the Amazigh people of North Africa, do in fact view themselves as the majority, not a minority, and are the indigenous inhabitants of their respective regions. Consequently, the terminology on the survey perpetuates further cultural conflicts especially considering the current political environment and the lasting effects of Arabization policies on the Amazigh groups, who do not refer to themselves with the derogatory term of "Berber".



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The NNAAC survey currently reads: "A MENA classification will also allow many sub-national minority communities (i.e. Assyrians, Chaldeans, Kurds, Berbers, etc.) that originate from this region to self-identify." Speaking on behalf of the Amazigh American communities, we do not want to be classified under an Arab ethnic identity, which would be discriminatory and refuse us the right to express our identity and culture. We urge you to consider clarifying this inaccurate information and prejudiced proposal, in which an Arab ethnic group sub-classifies non-Arab ethnic groups who have steadfastly refused that homogenization. We urge you to consider the ongoing misconception that North African Americans are a group from the Middle East, and respect our self-identification.

We hope that you will take into consideration the fact that the survey submitted by NNAAC is not only offensive to us because of its inaccuracy, but because it contributes to the exclusion and marginalization of Amazigh, Kurdish, and other groups' identities in public spheres and among policymakers. We do not have an issue with the Arab American classification existing. We have an issue with our communities being inappropriately classified as "Arab." Amazigh Diaspora greatly values its American identity for the freedom it has given us to bring issues of marginalization and discrimination to a political platform and to advocate for more just and democratic societies.

We look forward to your response and thank you for your understanding.

[Multiple Submissions]

We are writing in a response to an initiative by some Arab Americans to re-classify the population from origins in the Middle East and North Africa ("MENA" region) as "Arab." It is highly concerning when one ethnic group "Arab" is organized to include sub-national and ethnic groups who are referred to as minorities. These "minority" groups, including the Amazigh people of North Africa, do in fact view themselves as the majority, not a minority, and are the indigenous inhabitants of their respective regions. Consequently, the terminology on the survey perpetuates further cultural conflicts especially considering the current political environment and the lasting effects of Arabization policies on the Amazigh groups, who do not refer to themselves with the derogatory term of "Berber".

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[Multiple Submissions]

I am writing to express my support for the Census Bureau's plan to test a Middle East and North Africa (MENA) Category as part of the 2015 National Content Test.

I encourage the Bureau to use a comprehensive geographic definition of the MENA region which includes at least all the countries which are members of the League of Arab States, as well as Turkey and Iran. This regional definition will allow the many sub-national minority communities (e.g., Assyrians, Chaldeans, Kurds, Berber, etc.) that originate in this region to self-identify.

I also strongly support including the MENA category on the 2020 U.S. Census. I am concerned that there is currently no category on the U.S. Census that includes persons

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Americans from the MENA region, such as Lebanese, Iranians, Egyptians, Syrians, Moroccans, Algerians, etc.

As you know, Middle Eastern and North African responses are currently classified as "White" under the OMB standards used by the Census Bureau. This lack of an accurate ethnic category has led to a significant under-count of MENA communities, preventing our access to basic services such as language assistance, educational grants, and funding for cultural competency training. Additionally, being counted in the Census would also allow for more effective implementation, monitoring, and enforcement of civil rights protections for our community.

Thank you for your work to create this MENA category and test it on the 2015 National Content Test. The addition of the MENA category on the U.S. Census will provide a more accurate and inclusive count of our community.

I am writing to express my support for the Census Bureau's plan to test a Middle East and North Africa (MENA) Category as part of the 2015 National Content Test.

Growing up, I identified as an Arab-American and was confused when I had to fill out forms for state-wide examinations and the only categories I saw were white, hispanic, asian or african-american. This confusion continued for years as I filled out college applications, law school applications, financial aid scholarships and the like. Other than a matter of cultural pride, people that consider themselves members of Middle Eastern and North African descent have been treated as minorities without receiving any of the protections or benefits that other minority groups receive, leaving us feeling unrepresented and often overlooked. For example, I was not eligible for any minority scholarships in college because my ethnicity was considered "white" although I am a Syrian-American.

I encourage the Bureau to use a comprehensive geographic definition of the MENA region which includes at least all the countries which are members of the League of Arab States, as well as Turkey and Iran. This regional definition will allow the many sub-national minority communities (e.g., Assyrians, Chaldeans, Kurds, Berber, etc.) that originate in this region to self-identify.

I also strongly support including the MENA category on the 2020 U.S. Census. I am concerned that there is currently no category on the U.S. Census that includes persons Americans from the MENA region, such as Lebanese, Iranians, Egyptians, Syrians, Moroccans, Algerians, etc.

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Thank you for your work to create this MENA category and test it on the 2015 National Content Test. The addition of the MENA category on the U.S. Census will provide a more accurate and inclusive count of our community.

As the husband of an Arab-American and a specialist in the Middle East, I am writing to express my support for the Census Bureau's plan to test a Middle East and North Africa (MENA) Category as part of the 2015 National Content Test. I encourage the Bureau to use a comprehensive geographic definition of the MENA region which includes at least all the countries which are members of the League of Arab States, as well as Turkey and Iran. This regional definition will allow the many sub-national minority communities (e.g., Assyrians, Chaldeans, Kurds, Berber, etc.) that originate in this region to self-identify.

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This policy is an obviously rational and common sense thing to do. It will be of benefit to both the stakeholder communities and to governmental agencies in relations with these communities.

I also strongly support including the MENA category on the 2020 U.S. Census. I am concerned that there is currently no category on the U.S. Census that includes persons Americans from the MENA region, such as Lebanese, Iranians, Egyptians, Syrians, Moroccans, Algerians, etc.

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I STRONGLY URGE AND SUPPORT the inclusion of the MENA category because it makes the census more inclusive and makes all citizens more valued and equal in our society !!!!

Thank you for your work to create this MENA category and test it on the 2015 National Content Test. The addition of the MENA category on the U.S. Census will provide a more accurate and inclusive count of our community.

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I also strongly support including the MENA category on the 2020 U.S. Census. I am concerned that there is currently no category on the U.S. Census that includes persons Americans from the MENA region, such as Lebanese, Iranians, Egyptians, Syrians, Moroccans, Algerians, etc.

As you know, Middle Eastern and North African responses are currently classified as "White" under the OMB standards used by the Census Bureau. This lack of an accurate ethnic category has led to a significant under-count of MENA communities, preventing our access to basic services such as language assistance, educational grants, and funding for cultural competency training. Additionally, being counted in the Census would also allow for more effective implementation, monitoring, and enforcement of civil rights protections for our community.

Also, as an urban geographer who uses census data in research, and who has studied the historical development of the U.S. Census, and who works with and studies urban Muslim communities in the U.S., I would argue this would be a significant improvement in the Census's current categories.

Thank you for your work to create this MENA category and test it on the 2015 National Content Test. The addition of the MENA category on the U.S. Census will provide a more accurate and inclusive count of our community.

I, as an Egyptian-American, am writing to express my support for the Census Bureau's plan to test a Middle East and North Africa (MENA) Category as part of the 2015 National Content Test. I encourage the Bureau to use a comprehensive geographic definition of the MENA region which includes at least all the countries which are members of the League of Arab States, as well as Turkey and Iran.

It is also important that this regional definition allows the many sub-national minority communities (e.g., Assyrians, Chaldeans, Kurds, Berber, etc.) that originate in this region to self-identify.

As you know, Middle Eastern and North African responses are currently classified as "White" under the OMB standards used by the Census Bureau. This lack of an accurate ethnic category has led to a significant under-count of MENA communities, preventing our access to basic services such as language assistance, educational grants, proper health care, and funding for cultural competency training. Additionally, being counted in the Census would also allow for more effective implementation, monitoring, and enforcement

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of civil rights protections for our community.

Thank you for your work to create this MENA category and test it on the 2015 National Content Test. The addition of the MENA category on the U.S. Census will provide a more accurate and inclusive count of our community.

PREFACE - For many years I have opted, when given the chance, on many different forms and applications to identify my heritage as being either Arabic or Semitic, rather than Caucasian which is normally the only other selectable category.

I am writing to express my support for the Census Bureau's plan to test a Middle East and North Africa (MENA) Category as part of the 2015 National Content Test. I encourage the Bureau to use a comprehensive geographic definition of the MENA region which includes at least all the countries which are members of the League of Arab States, as well as Turkey and Iran. This regional definition will allow the many sub-national minority communities (e.g., Assyrians, Chaldeans, Kurds, Berber, etc.) that originate in this region to self-identify.

I also strongly support including the MENA category on the 2020 U.S. Census. I am concerned that there is currently no category on the U.S. Census that includes persons Americans from the MENA region, such as Lebanese, Iranians, Egyptians, Syrians, Moroccans, Algerians, etc.

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Thank you for your work to create this MENA category and test it on the 2015 National Content Test. The addition of the MENA category on the U.S. Census will provide a more accurate and inclusive count of our community.

[Multiple Submissions]

I am writing to express my strong support for the addition of a Middle East and North Africa (MENA) category by the U.S. Census Bureau on the 2020 Census. As you well know, there is currently no ethnic category for Americans from the MENA Region on the U.S. Census, a region that comprises at least all of the members of the Arab League of States. This has led to a significant undercount of the community, creating barriers to many basic rights and services.

The creation of a coherent ethnic category for the MENA region will have a positive impact on the treatment and services available to members of the community. The

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undercounting of Americans from the Middle East and North Africa has served as a barrier to representation, education, health, and employment for the community. New and expanded data provided by the inclusion of a Middle East and North Africa checkbox on the 2020 Census will arrive at a better count of our community and ensure greater access to necessary resources.

Thank you for your efforts in the creation of this new category.

I am writing to express my strong support for the addition of a Middle East and North Africa (MENA) category by the U.S. Census Bureau on the 2020 Census. As you well know, there is currently no ethnic category for Americans from the MENA Region on the U.S. Census, a region that comprises at least all of the members of the Arab League of States. This has led to a significant undercount of the community, creating barriers to many basic rights and services.

I support the Census Bureau's plan to test a Middle East/North Africa ethnic category as part of its 2015 research for content improvements to the 2020 Census. I encourage the Bureau to use a comprehensive geographic definition of the MENA region to include at least all the countries which are members of the League of Arab States, and in addition, Turkey and Iran; this regional definition will allow the many sub-national minority communities (e.g., Assyrians, Chaldeans, Kurds, Berber, etc.) that originate in this region to self-identify.

I support the importance of testing a category for a growing American ethnic population that is mostly invisible in federal statistics and reports, and yet rEmails hyper-visible in our country's political, policy, law enforcement and security arenas. The accurate and inclusive data collection on the MENA population will inform policymakers, federal and local officials, service organizations, and the public on the status of these communities, their needs, and the assets they bring to local, national and international issues.

The creation of a coherent ethnic category for the MENA region will have a positive impact on the treatment and services available to members of the community. The undercounting of Americans from the Middle East and North Africa has served as a barrier to representation, education, health, and employment for the community. New and expanded data provided by the inclusion of a Middle East and North Africa checkbox on the 2020 Census will arrive at a better count of our community and ensure greater access to necessary resources.

As a college professor, I can also attest that this data will help us better serve the needs of MENA students on campuses.

Thank you for your efforts in the creation of this new category.

As a licensed business psychologist and scientific researcher, I unequivocally support the Bureau's plan to test a Middle East and North Africa (MENA) Category as part of the 2015 National Content Test. I encourage the Bureau to use a comprehensive geographic definition of the MENA region.

Self-identification is a basic psychological & American right.

I also strongly support including the MENA category on the 2020 U.S. Census. There is currently no category on the U.S. Census that includes Americans from the MENA region, such as Lebanese, Iranians, Egyptians, Syrians, Moroccans, Algerians, etc.

The current system results in a significant under-count of MENA communities, preventing researchers access to basic info.

Additionally, being counted in the Census would also allow for more effective implementation, monitoring, and enforcement of civil rights protections for all.

Thank you for your work to create this MENA category and test it on the 2015 National Content Test. The addition of the MENA category on the U.S. Census will provide a more accurate and inclusive count of the US.

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As an English as a Second Language teacher of adults, I have often wished there were a better category in which to place my Middle Eastern students. I am in favor of adding such a category for the census, as well as for other areas.

As the President and the Owner of [redacted], I would like to bring to your attention that Amazigh or Berber population is far from being a sub group or a minority group descending from Arabs. We have our civilization, our culture, our history and own language. We are even in year 2965, which is 1529 years older than the Arab calendar year.

The Berbers are trying for many years to prove their existence, and get back their stolen land, taken by Arabs invasions. Being classified as a minority affiliated to Arab community is an insult to us.

We Berbers call our selves Amazigh which means Free Men and do not want to be associated or affiliated to any other ethnicity. If the Arabs want to get noticed and added included in the census they can do so with their own population, they do not need to add Berbers to their list. Every time I participate to the International festival to represent the Berber Community I bring this up to the United Nation's attention as the Arab-Americans always include us in their booth as minority being part of their Arab culture.

I want to let you and everyone know that We Are Berbers and not ARABS, we exist and our civilization is in history.

I am asking your kindness to please discard the request of the NNAAC to new classification of Arab Americans with a sub-classification of "Berber", and would like to urge you to stop this sub-classification from happening, and include the Berbers in federal data of your 2020 census.

I am against that MENA region designation as a new race on the next census. It is not. It is a way for a group to get more money from our government. The argument that they are invisible is just not true. They are on school boards, city councils and now the census National Advisory committee.

I am against the classification of MENA, or Middle East-North Africa, in the 2020 Census. The Muslims are beheading and waging Jihad against Americans in the Middle East. We should not give them more political power to spread their hate in America.

I am an Amazigh (Berber) American and I am writing to you in a response to an initiative by the Arab-American Group NNAAC to re-classify the population from origins in the Middle East and North Africa ("MENA" region) as "Arab." It is disturbing when one ethnic group, called "Arab", is organized to include sub-national and ethnic groups who are referred to as minorities. These "minority" groups, including the Amazigh people of North Africa, do in fact view themselves as the majority, not a minority, and are the indigenous inhabitants of their respective regions. Consequently, the terminology in the survey perpetuates further cultural misrepresentations, especially considering the current political environment in North Africa and the lasting effects of "Arabization" policies on the Amazigh people, who do not refer to themselves with the derogatory term of "Berber".

The NNAAC survey currently reads: "A MENA classification will also allow many sub-national minority communities (i.e. Assyrians, Chaldeans, Kurds, Berbers, etc.) that originate from this region to self-identify." The Amazigh-American community is against being classified under an Arab ethnic identity, which would be discriminatory and refuses it the right to express its identity and culture. I urge you to consider clarifying this inaccurate information and prejudicial proposal, in which an Arab ethnic group sub-classifies non-Arab ethnic groups who have steadfastly refused that homogenization.

I urge you to re-consider the ongoing misconception that North African Americans are a group from the Middle East, and respect our self-identification.

I hope that you will take into consideration the fact that the survey submitted by NNAAC is not only offensive to Amazigh people because of its inaccuracy, but because it contributes to the exclusion and marginalization of Amazigh, Kurdish, and other groups' identities in public spheres and among policymakers. I do not have an issue with the Arab American classification existing. I have an issue with my community being inappropriately classified as "Arab." The Amazigh Diaspora in USA greatly values its American

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identity for the freedom it has given us to bring issues of marginalization and discrimination to a political platform and to advocate for just and democratic societies.

I am an Arab-American citizen of the United States, who immigrated here in 1958. My contact information is in my signature below.

I strongly support including populations from the Middle East and North Africa in the census. This is an ethnic and not a racial category. Nor is it a religious category. Current census options simply do not fit us, and most of us are invisible because we tend to blend into our neighborhoods. At the same time, we are not protected from bias in employment, and our new immigrants do not receive the kind of support they need to effectively participate in the American dream.

I am in support of including a separate category in the census (and other documents) for people of Middle Eastern descent. Thank you

I am responding to the Federal Register's comment request on the 2015 National Content Test (NCT), specifically the consideration of Middle Eastern and North Africans (MENA) being identified as Arab-Americans on the next United States Census collection.

America, the land of the free and home of the brave does not need hyphenated categories of people. America needs citizens who are 100% dedicated and committed to being one group of Americans and not Arab, African, Asian, Mexican, Black-American sub-groups. Present and future immigrants should assimilate and become Americans. The division of America into subgroups fails to bring unity. The proposal for an Arab-American subgroup will do nothing more than further divide America. America was not established to be bi-, tri-, or quad-lingual, cultural or racial in a national sense. United we stand, divided we fail and fall.

According to the Constitution, Article I, Section 2, Congress is given the power to enumerate the population in accordance with the statute that Congress enacts. The enumeration process is for determining the number of representatives who are to be elected to the U.S. House of Representatives. Any law directing any or more splinter groups leads to bigger government, more taxes and more division. America needs a smaller central government, less taxation and less division of its population.

Those supporting the Arab-American designation state that "we need to rethink who we are". It really does not take re-thinking to determine who we are or who we want to continue to be as a population and as a nation. Are we going to be one nation under God, or a mixture of hyphenated American groups following many different false gods? It is important to count the people, but we must stop the spending and focus on becoming a smaller government.

I do not support the 2015 National Content Test.

I am thrilled that the Census Bureau is testing a MENA category!

As a sociologist who has studied Arab Americans for decades, good quantitative data on these groups has been extremely difficult to obtain, and sample data from ancestry questions are prone to large error. It is important for this data to be useful that the write in responses are coded properly and that all potential identity responses are considered.

I further recommend that you do testing in multiple areas where there are large Arab American and MENA communities. Since we know that responses to the Census are in part socially constructed, a wide and deep sample is important.

I am vehemently opposed to creating this new category of ME-NA in the U.S. Census.

I am writing in opposition to the addition of a new classification for people from the Middle East and North Africa region by the U.S. Census Bureau on the 2020 Census. I call on your opposition for the testing of MENA as an ethnic classification. Our national motto is E pluribus unum, "Out of many, one" not E unum pluribus, "From the one, many." The addition of this "class" would encourage division in our great country instead of unity as one people made up of many nationalities, countries, religions, races, etc. People have



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been coming to America for four hundred years to get away from the divisions and divisiveness of their former countries.

I believe that data collection on the MENA population in the U.S. will serve as a source of division as policy makers, federal and local officials, public institutions, service organizations, and perhaps the public, try to identify subsets of the American people for special treatment and privileges not available to the community at large. In his recent State of the Union message to Congress, President Obama urged us to "recapture the sense of common purpose that has always propelled America forward." Not divided purpose, but common purpose.

I am writing to express my opposition to the National network Arab American census idea that puts all ethnic groups such as kurds, Berbers etc undet the Arab category.

These groups have their own languages and cultures and they would not identify themselves as Arabs at all. Your census numbers would not be accurate at all. I personally would not check any box that identifies me anything as Arab. This is because my mother tongue is Berber.

However, if you ask me which languages i speak, i would check. Arabic Berber, french, and English.

A more appropriate question is: which languages do you speak?

I am writing to express my vehement opposition to creating any new sub-category of persons for upcoming U.S. Census surveys, particularly the currently proposed Middle Eastern-North African.

First of all, the U.S. government has no business creating what will be yet another special interest group. This country is socially fragmented enough as it is.

Secondly, in light of everything we're seeing in Europe now, we should encourage those of Arab ancestry in this country to continue to assimilate, not promote their separation from our shared American identity. The Europeans are seeing the failure of the lack of integration of their Middle Eastern-North African communities, the absolute worst thing we could do right now is emulate their mistakes.

Again, mark me vehemently opposed.

I am writing to express strong opposition to the MENA category. According to anthropologists, Semites and peoples of the middle east are WHITE Caucasians. Some peoples of North Africa are not Caucasians. This MENA category is scientifically Wrong and inaccurate. It consudes different races. Lebanese are white, while some Moroccans are and Egyptians are NOT. This is a blatant grab for federal funds by special interest groups. I am of Lebanese descent and strongly oppose the MENA category.

I am writing to urge you to support the creation of a census classification for people who are from the Middle East, or who are of Middle Eastern or North African ancestry. This ethnic classification is extremely important because of the large numbers of people who appropriately belong in this classification. People from the MENA region may identify with several racial groups, but have much in common to unify them. Currently, there is no way on the census forms to identify this group, and so we rEmail an "invisible community".

I am of MENA background, and have always found it confusing as to how I should identify. Please help us to correct this omission for the hundreds of thousands of Syrians, Egyptians, Chaldeans, Kurds, Lebanese, Algerians, and many, many other groups, in our country, who should be counted as MENA.

Thank you for anything you can do to correct this serious issue.

I am writing to you today to support the Census Bureau's plan to test a Middle Eastern and North African (MENA) category for the 2020 Census. The research into this category is certainly important but the creation of the category – and the recognition of the uniqueness of the people from this region – is necessary at this point in our history as

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Americans.

As a scholar, I know that definitions of geographical areas are often hard to determine. On behalf of the Census 2020 Research Working Group, I would like to express our support of the definition of MENA as "Arab League + 3". By this I mean the 22 members of the League of Arab States: Algeria, Bahrain, Comoros, Djibouti, Egypt, Iraq, Jordan, Kuwait, Lebanon, Libya, Mauritania, Morocco, Oman, Palestine, Qatar, Saudi Arabia, Somalia, Sudan, Syria, Tunisia, United Arab Emirates, and Yemen, as well as Turkey, Iran and Israel. There are limitations of determining people according to state-based definitions so I would include the many sub-national communities and identities that reside in those countries (and only if they are from one of those countries listed above), including Armenians, Assyrians, Chaldeans, Kurds, Berbers or Imazighen. More perplexing is how to assign ethno-religious groups or sects that are written as responses. I would encourage the Census Bureau to acknowledge that not all MENA peoples are Muslim and self-identify ethnically as Chaldeans, Assyrians, Maronites, Copts, Druze, etc. and should be honored by these self-ascriptions at face value, as part of the MENA geographic category.

Some examples will be given if the MENA checkbox is approved. I would encourage the examples to be the most popular answers from past surveys and censuses with some leeway for growing nationality-based immigrant groups (e.g. Arab/Arabic, Lebanese, Palestinian, Egyptian, Yemeni) as well as the explicit acknowledgement of groups that may question their inclusion in the MENA category such as Iranian, Somali, Sudanese, Assyrian, or Berber/Amazigh.

I hope that this email will be considered as you continue through the review process at this important time for those from the MENA region. As a scholar on the issue, I will be closely watching the outcome and deliberations with great professional and personal interest.

I read a column in the Southgate, Mich. The News-Herald newspaper. It stated the census bureau is considering adding a new race classification for persons from the Middle East-North Africa (MENA). In this article an Arab-American is quoted that they remain "an invisible community" because they are obligated to classify as white. I desire to comment.

In the 2010 census there were, I believe, race/nationality options such as African-American, Native-American, Spanish surnamed-American, etc. etc. etc.

My race/nationality was not identified so I was supposed to identify as WHITE. I was not even given the option of identifying as an American regardless of my ancestry. I strongly objected so I crossed out every offered race/nationality designation and wrote in European-American. My ancestry is Polish and Czechoslovakian. I am not WHITE. I want my minority status so I will be treated differently, and, receive more federal benefits than those who are simply WHITE.

I could not believe the census bureau was so stupid as to classify anyone as WHITE, and, omitting their American citizen designation.

I read in the Detroit News today that the census is considering adding a new classification of middle eastern to the next census. The article provided your email address if we want to make our opinion known to the Census department.

The article identified that the reasoning behind adding this classification was so that middle eastern descendants would be able to obtain more benefits from the government.

The census should NOT add this new classification.

It does not do that for those who are descendants of Irish, German, Italian, Polish, Russian, ... nationalities.

People of middle eastern descent are not discriminated against and do not need an avenue to attain benefits not available to everyone else.

I strongly support the:

- The Arab League + 3 definition of MENA (preferably mentioning "Arab", "Arabic", Iran, Turkey, Israel (to include the 48ers) and the 22 member countries of the Arab League.

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- Inclusion of corresponding subnational minority groups (Chaldeans, Assyrians, Kurds, Armenians, Berbers, etc.) that originate in the region

I think it would be a good idea to change the census to include Arab American as a population group. It will better show ethnic diversity.

I want to strongly support the creation of MENA in the Census. I am a retired Middle East cultural anthropologist who taught at Wayne State Univ in Detroit for 34 years and have been on the Board of Directors of ACCESS for 40 years. I have always felt the need for this classification in my and my students research, and I know I speak for many others. I also served as President of the Middle East Studies Association of North America. At one time , many years ago I was on the committee to achieve this classification.

Please count me in as one of the strong supporters.

I'm not for this Mena idea on the basis that labels just divide people. The entire race section should be replaced with American or non American. BTW the nnaac has a quick fill in the blank webpage for the Mena to be promoted, which I think is cheating.

I'm writing to say I fully support AAI's push for an ethnic category for the MENA communities in the US – with the MENA region as defined below -- using Arab League definition - plus three non-Arab states - and with the inclusion the subnational minority groups:

- The Arab League + 3 definition of MENA (preferably mentioning "Arab", "Arabic", Iran, Turkey, Israel (to include the 48ers) and the 22 member countries of the Arab League.
- Inclusion of corresponding subnational minority groups (Chaldeans, Assyrians, Kurds, Armenians, Berbers, etc.) that originate in the region

It has come to our knowledge that the National Network of Arab American Communities (NNAAC) has conducted a campaign to have the Census Bureau include a new category called MENA (Middle East and North Africa). According to NNAAC this category would include not only Arabs but also people living in the so-called MENA region, i.e., Amazighs (referred to as Berbers by others), Kurds, Copts, Assyrians, etc.

My name is [redacted]. I am the president of TIWIZI, inc a Pennsylvania nonprofit organization founded to help the people of Kabylia, an Amazigh region of Algeria and foster friendship between the American and the Kabyle people. For this reason, I thought it would be appropriate to write to you about the position of Tiwizi and its members. I have already written you on my own behalf.

TIWIZI considers that the Amazigh people, although geographically included in the so-called MENA region, such geographical designation lumping the Middle East and North Africa does not serve the interests of the Kabyle and Amazigh people.

The Kabyle and the Amazigh in general are the indigenous people of North Africa. While many of them have adopted the moslem religion, they do not consider Islam as their primary identity. Their strong Amazigh culture and secular organization is what defines them. This culture and their way of life has come under threat for centuries by invading conquerors and especially North Africa independent Arab-Moslem centrist states and dictators that do not recognize them and have always tried to suppress their identity and assimilate them.

We think that NNAAC is doing us a disservice by campaigning for this category. Arab centrist states have always tried this inclusion and presented the best Amazigh people as Arabs, but acceptance among Arabs means assimilation to us, which is not acceptable. We do not want to be assimilated as Arabs and certainly not represented by them.

We believe that a MENA category assimilates people who do not want to be assimilated. Therefore, we think it should not be implemented. Please consider this: the Kurds do not want to be assimilated with a Saddam, the Amazighs do not want to be assimilated with a Kaddafi or a Bouteflika and the Egyptian Copts do not want to be assimilated with Egypt's Islamic radicals, etc.

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I urge you not to take into consideration the request of NNAAC as formulated as, we think it has a negative impact on all of the people who suffered at the hands of the Arabs.

My name is [redacted] and I am the outgoing president of the [redacted], an organization of more than one hundred people. I am writing you to convey the concern of our membership regarding the suggestion from the NCAAC organization concerning the classification of Imazighen as a subgroup of Arabs which we are not. The attached letter is our official response. The Arab American organizations do not speak for Imazighen nor for North Africans in general. We are of North African Amazigh origins and it is our right to speak for ourselves.

The vast majority of the people of North Africa (Mauretania, Morocco, Algeria, Tunisia and Libya) consider themselves Imazighen (plural of Amazigh) even when they do not practice the language Tamazight in their daily lives. In addition Imazighen can be found living and practicing their culture and language in Mali, Niger and even in the Canary Islands (part of Spain) and in the Oasis of Siwa in Egypt. A growing immigration of Imazighen to North America is making more Americans aware of the true identity of North Africans.

Of the 90 Million or more living today in the countries that form North Africa, more than 40 millions continue to use their language even when the governments of Morocco, Algeria, Lybia and Tunisia want to impose the Arabic language on them.

There was a small number of Arabs who came to North Africa in the 7th and then 11th century to convert Imazighen to Islam (Imazighen during those time were either non religious or were Christians (e.g. the famous Saint Augustine) or Jewish. But even if some converted to Islam, they continued to follow their Amazigh culture and traditions, and especially using Tamazight as their preferred language. Therefore, we do not consider ourselves as Arabs.

The people of North Africa should not be considered as part of the Middle East. In addition, the people of North Africa in their vast majority are Imazighen (Berbers), speaking Tamazight (the Amazigh language). Therefore, a new classification in the census form is needed to identify the vast majority of the people coming to the United States from North Africa, as Imazigen (Berber) on their own right and not as a subsection of some other culture or people to which they do not belong to.

I look forward to seeing the new Census Form reflect the reality of the true identity of North Africans who come to settle in the United States of America: Imazighen (Berbers).

[Multiple Submissions]

I am writing in support of the addition of a new classification for people from the Middle East and North Africa (MENA) region by the U.S. Census Bureau on the 2020 Census. I call on your support for the testing of MENA as an ethnic classification. People from the MENA region identify with many racial backgrounds. Unfortunately, no designation currently exists on the Census forms for individuals who trace their roots to the MENA region. We effectively remain an “invisible” community which has left us undercounted and underrepresented. A MENA classification will also allow many sub-national minority communities (i.e. Assyrians, Chaldeans, Kurds, Berbers, etc.) that originate from this region to self-identify.

I believe that accurate and inclusive data collection on the MENA population in the U.S. will serve as a resource to policy makers, federal and local officials, public institutions, service organizations and the public, in assessing the status and needs of these communities.

Thank you for your contributions in the development of this new category

On the basis of long experience with and thought on the rationale and consequences of the divisive governmental practice of asking individuals to classify themselves into racial or ethnic categories, I suggest the Census Bureau drop this idea. Surely some in the Census Bureau are aware of the racist origins of governmental racial classifications in the U.S.?!

It is ridiculous to propose adding new race/ethnicity categories instead of starting the process to eliminate all such categorization by government. The CB's problem clearly is

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much bigger than the MENA proposal, and it is understandable the CB may not want to deal with the larger issue at the moment. But then when will it, some of us ask.

The country's situation is that while only about 2% of the population "checks more than one box" on the census form, the great majority of individuals in the US are to some degree and have been for some time, multiracial. Deliberately or not, the CB has obscuring that fact and perpetuating ideas about "race" more than a century out of date.

Has any one in the CB been on a university campus recently and seen who's holding hands with each other? And this is hardly anything new. As an "Anglo" I married a Chinese woman at Cornell half a century ago next week.

Has anyone asked the MENA category proponents how they think how the tens of thousands of children should be classified who have one MENA parent and one non-MENA parent? and the tens of thousands of such yet to be born? Mongrel infidels perhaps?

About a dozen years ago in California we put the Racial Privacy Initiative (RPI) on the ballot. This would have forbid all state government entities from asking people to identify their race/ethnicity on forms of any sort (except where required by the federal government, and a few other exceptions). Reliable polls just a couple of months before the vote showed that in every racial/ethnic group in California, a majority of those with an opinion on the matter wished to eliminate the governmental racial classification of people.

In gathering signatures to put that initiative on the ballot, I scoured local university campuses (San Diego State University, University of California at San Diego, San Diego community colleges) passing out a flyer on the subject and asking students to sign the petition form. It was a truly delightful experience, as in their very great majority (>90%) students of all racial groups signed enthusiastically. At SDSU I even had students wanting to sign seeking me out in the central plaza after hearing about the petition from their dorm mates and class mates.

But shortly before the vote, leading opponent CA Lt. Gov. Cruz Bustamante with a war chest of ca. \$12,000,000 began a massive campaign of TV and radio ads against the RPI. They paid former US surgeon general Everett Koop to go on TV and say the initiative would put millions of California children's lives at risk, etc., etc. Then all the race hucksters got involved. So the initiative did not pass but it still got 37% voting in favor of it.

Supposedly the data banks providing demographic data by race are especially needed to fight discrimination. But several points. 1) the resultant data sets have rarely been useful in winning actual discrimination cases, but have been and are relentlessly used, along with naive use of statistics and the cooperation of statistically naive journalists, to bring and publicize bogus and divisive charges of discrimination; 2) we do not need ethnicity/race data to fight racial discrimination any more than the government needs personal information on our political and religious beliefs in order to fight political and religious discrimination; 3) because a person's self-classification usually ignores their actual ethnic/racial origins and because most Americans are multiracial/multiethnic the data sets are fairly meaningless -- and valued mostly by academic social scientists, both conservative and liberal, who cry they will be unable to survive and publish articles if the government stops supplying them with the bogus data sets on racial composition.

From the beginning computer scientists have been warning us to understand the powerlessness of computers and statistics to overcome bad study design and bad data sets. "Garbage in, garbage out," they say. This new proposal of the census bureau essentially aims to increase the flow of "Garbage in."

On behalf of Oakwood Healthcare, I am writing this letter in support of the U.S. Census Bureau including a new ethnic classification for persons from the Middle East and North Africa region in the 2020 Census.

Based in Dearborn, Michigan, Oakwood provides acute, specialty, primary and preventive care services backed by excellence in research and education. In addition to hospitals in Dearborn, Taylor, Trenton and Wayne, we operate 70 outpatient facilities, a rehabilitation skilled nursing facility and a residential retirement community. As one of the founding organizations of Beaumont Health, Oakwood is committed to improving the health and well being of the individuals and communities in southeastern Michigan.

Oakwood serves a large, diverse community that includes more than 62,000 people descended from the MENA region. According to the Prevention Research Center of Michigan

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- and borne out by our own experience - little data exists about the prevalence and outcomes of significant health issues within this population, including cancer, diabetes, HIV/AIDS and mental health.

With U.S. census data, Oakwood can better identify and support the unique health needs of this population through:

- medical research
- clinical language services
- post-hospitalization care management and coordination
- end-of-life care
- community education, programs and services

We believe accurate, inclusive data collection regarding the MENA population in the U.S. will be a valuable resource for federal and local officials, policy makers, public institutions and service organizations. It will certainly enable Oakwood to provide health care that is even more culturally sensitive, efficient and effective. Therefore, it is our sincere hope that MENA will be included as an ethnic classification in the 2020 Census.

Please don't add another "classification" to the census. Don't we have enough 'racial' tension now? When I am asked my race, if it only says "white", I mark 'other', followed by "Human race, of Caucasian persuasion". All this ethnicity is just as bad as the various religions.

[Multiple Submissions]

I am writing to express my strong support for the Census Bureau's plan to test a Middle East and North Africa (MENA) category as part of its 2015 research for content improvements to the 2020 Census.

As you are aware, there is currently no ethnic category for Americans of Iranian descent on the U.S. Census. This has led to a significant undercount of the Iranian American community. The creation of a MENA category in the U.S. Census will have a significant and enduring impact on the treatment and services available to the Iranian American community.

I support the importance of testing a category for a growing American ethnic populations that are mostly invisible in federal statistics and reports. Inclusive data collection on the MENA population will inform policymakers, federal and local officials, service organizations, and the public on the status of these communities, their needs, and the assets they bring to local, national and international issues.

[Multiple Submissions]

We write in support of a proposal by the U.S. Census Bureau to test a Middle East and North Africa (MENA) category for possible inclusion in the 2020 Census. At present, the Census does not provide an option for people who are from this region to identify themselves. This proposal would provide a more accurate picture of the demographic composition of the United States, which is critical to ensure the proper allocation of government resources.

Excluding the MENA category has serious ramifications for members of these communities, many of whom live in the State of Michigan. For example, since the MENA community is not included in the Census they are not eligible for protection under Section 203 of the Voting Rights Act, which ensures the availability of foreign language ballots. Additional examples include researchers having difficult conducting studies on health disparities without this critical information and challenges monitoring employment discrimination against Arab Americans without accurate count of the size and location of the population. These are only a few examples of the disadvantages the MENA community faces as a result of their exclusion from the Census.

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We all want to improve the accuracy of the Census, and it is our belief that including a broad MENA category would help us achieve this shared goal. We encourage you to move forward with this proposal as quickly as possible. Thank you for your consideration of this request.

[Multiple Submissions]

I am writing to you on behalf of the American-Arab Anti-Discrimination Committee (ADC), the country's largest Arab-American civil rights organization. ADC is committed to protecting civil rights, promoting mutual understanding, and preserving the Arab cultural heritage. ADC has protected the Arab-American community for thirty five years against discrimination, defamation, racism, and stereotyping. ADC respectfully takes this opportunity to submit comments and recommendations to the Department of Commerce regarding the proposed information collections of the 2015 National Content Test (NCT), and particularly with regard to the inclusion of the proposed Middle Eastern or North African (MENA) category in the race question.

Inclusion of the MENA category on the 2015 National Content Test is both necessary and practical. ADC is strongly concerned that there is currently no category on the U.S. Census that includes the MENA community, and effectively Arab-Americans. The MENA demographic should include the 22 Arab countries in the Arab League: Algeria, Bahrain, the Comoros Islands, Djibouti, Egypt, Iraq, Jordan, Kuwait, Lebanon, Libya, Morocco, Mauritania, Oman, Palestine, Qatar, Saudi Arabia, Somalia, Sudan, Syria, Tunisia, the United Arab Emirates, and Yemen. Arab countries have a rich diversity of ethnic, linguistic and religious communities. The lack of a racial or ethnic category that accurately reflects the Arab-American population has led to a significant under-count of our community. This impacts agencies' evaluation of our community's needs, as well as our community's access to services and resources.

The necessity and practical utility of testing a MENA category on the 2015 National Content Test (NCT):

ADC supports the ongoing evaluation of Census questions that gather data on race and ethnicity because of its necessity and practical utility in having an accurate understanding of the make-up of our ever-growing and diverse country. The collection of accurate and comprehensive data on race and ethnicity is necessary for implementing many important civil rights laws and policies, such as the Civil Rights Act of 1964 and the Voting Rights Act of 1965. For instance, the Voting Rights Act prohibits discrimination on the basis of race, color, or membership in minority language group. Accurate data on race and ethnicity is needed to evaluate the efficacy of voting rights protections and monitor attempts to suppress and dilute the vote of minority populations. It is also need to evaluate the fairness of political representation and redistricting. Further, this data is critical for monitoring equal opportunity across sectors of the economy, including housing, education, health care, and employment.

Inclusion of a MENA category would have a positive impact on the Arab-American community in a variety of ways. Being counted on the U.S. Census would benefit our community by making Arab-Americans eligible for many services and opportunities that are provided for minority populations, such as language assistance, educational grants, funding for cultural competency training, and minority business development loans. Inclusion of a MENA category in the Census would also allow for more effective implementation, monitoring, and enforcement of civil rights protections for the Arab-American community. For instance, advocacy groups such as ADC would have more accurate data to measure racial and ethnic discrimination against Arab-Americans.

Ways to enhance the quality, utility, and clarity of the information to be collected under the MENA category on the U.S. Census:

1. Including a geographically-broad MENA category with diverse examples of countries of origin

First, ADC strongly encourages the U.S. Census Bureau to use a comprehensive geographic definition of the MENA region in the race question. This regional MENA category should include all of the Arab countries which are members of the Arab League, which were previously mentioned, as well as the non-Arab states of Turkey and Iran. The U.S. Census Bureau can enhance the clarity of the information to be collected and minimize the burden on respondents by including diverse country examples in the MENA check box category for the race question. According to the Federal Register Notice 79 FR 71377, the 2015 National Content Test will include examples of "Lebanese, Iranian, Egyptian,

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Syrian, Moroccan, Algerian, etc.” These country examples support a geographically-broad MENA category because they include countries from the Levant, the Gulf, and North Africa. However, while the Levant and North Africa are represented twice in these country examples, ADC is concerned that there are no Arab country examples from the Gulf or Sub-Saharan Africa. ADC strongly recommends that the Bureau also include an example from Sub-Saharan Africa, such as Somalia or Sudan. ADC also recommends adding a Gulf Arab country, such as Yemen. Listing these diverse country examples will help to promote a broad regional definition of the MENA category, and thus allow more groups to identify with the MENA category .

2. Including instructions to “print your specific origin(s)/ethnicities” in the space provided

A MENA category that also allows for a space for groups to print their specific origin(s)/ethnicities will enhance the quality, utility, and clarity of the information collected. The word “ethnicity” should be included in the instructions since “origin” alone can be a confusing term. Additionally, including “ethnicities” in the instructions will allow the many sub-national minority communities that originate in this region to self-identify their specific ethnic group (e.g., Assyrian, Chaldean, Kurd, Berber, etc.). This will also allow the different ethnicities that originate in this region to identify with both their country of origin and ethnic group (e.g., Iraq and Arab, Iraq and Kurd, Morocco and Arab, Morocco and Berber, etc.). Examples of ethnicities should be listed in addition to the examples for countries of origin. This will reduce the burden on respondents and enhance the quality, utility, and clarity of the information to be collected.

Ways to minimize the burden of the collection of information on respondent:

1. Offering Arabic language support

According to Notice 79 FR 71377, an objective of the NCT is to test different options for offering non-English materials, and the goal is to provide language support for respondents with limited English proficiency. The Census Bureau should include materials in Modern Standard Arabic, which is the official and formal Arabic used by all regional Arabic dialects in printed materials. Offering Arabic language support would help to minimize the burden of the collection of information on respondents and boost response from those Arab-Americans who speak English as a second language. While the majority of Arab-Americans are bilingual, about half of Arab-Americans speak a language other than English in their homes. The availability of Arabic translated materials to respondents who need language support, will help maximize the number of non-English speakers that will be able to participate in the U.S. Census. This will help to ensure that all persons are counted.

2. Use of Internet-based questionnaires

a. Reducing the cost on the U.S. Census Bureau

The costs of offering non-English language materials can be reduced by use of Internet-based questionnaires, which negate the costs of producing extra materials for respondents with limited English proficiency. According to Notice 79 FR 71377, the language support options being explored on the NCT include online Spanish questionnaires, dual-language English and Spanish paper questionnaires and letters, and additional questionnaire options and support in non-English languages. Use of online questionnaires would allow the Census Bureau to expand its language support materials to minority languages that are less common than Spanish, such as Arabic, while also furthering the Census Bureau’s high-level goal of greatly reducing paper responses in the 2020 Census.

b. Reducing the burden on respondents

The use of Internet-based questionnaires can reduce the burden on respondents by making the questionnaire easily accessible for persons who use the internet. For instance, if the Census Bureau provides a link to the questionnaire, organizations such as ADC can forward the link to their members to remind them to respond to the questionnaire. These additional reminders will reduce the burden on respondents and thus increase the response rates. Further, ADC encourages to making the Internet-based questionnaire simple to use for those who are not technologically savvy. This entails making it simple for respondents to navigate through questions, limiting the number of questions on each web



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screen, and providing FAQs on how to complete and/or navigate the questionnaire.

Conclusion:

ADC appreciates the U.S. Census Bureau for its work to develop the new MENA category and test it on the 2015 NCT. ADC believes that the MENA category is a necessary and practical addition to the Census race response categories that will greatly benefit the Arab-American community. ADC urges the U.S. Census Bureau to include the MENA category on the 2020 Census. The inclusion of a MENA category on the U.S. Census will help ADC to fulfill its mission of protecting the civil rights and civil liberties of Arab-Americans.

On behalf of the Public Affairs Alliance of Iranian Americans (PAAIA), I am writing to express our strong support for the Census Bureau's plan to test a Middle East and North Africa (MENA) category as part of its 2015 research for content improvements to the 2020 Census.

As you are aware, there is currently no ethnic category for Americans of Iranian descent on the U.S. Census. This has led to a significant undercount of the Iranian American community. The creation of a MENA category in the U.S. Census will have a significant and enduring impact on the treatment and services available to the Iranian American community.

In order to obtain the most precise count of the various MENA communities, we encourage the Census Bureau to use a comprehensive geographic definition of the MENA region. We further advise the Census Bureau to revise the examples it provides in the notice in order to represent the diverse communities from the MENA region in a more equitable manner. Both of the above recommendations were submitted to the Department of Commerce by the Arab American Institute in a letter dated January 28, 2015.

Finally, we would also like to voice our support for the inclusion of the category on the form as a distinct question on ethnicity and national origin as opposed to a combined question on ethnicity and race. We maintain that persons from the MENA region, much like those of Hispanic origin, identify with many racial backgrounds and that ethnicity and national origin is the appropriate approach to this new category.

PAAIA supports the importance of testing a category for a growing American ethnic populations that are mostly invisible in federal statistics and reports. A MENA category in the 2020 Census will increase the accuracy of ethnicity reporting as well as better reflect self-identity of respondents. Inclusive data collection on the MENA population will inform policymakers, federal and local officials, service organizations, and the public on the status of these communities, their needs, and the assets they bring to local, national, and international issues.

We look forward to continuing our activities in collaboration with the U.S. Census Bureau throughout the MENA testing process. We are confident that our collaborative efforts will result in a more accurate count of the Iranian American and other MENA communities.

It has come to my attention through the Northeast Amazigh Community, which I am a proud member of, that the US Census Bureau is considering to classify the People of North African descent as part of the so-called MENA ethnic classification. As I am sure you know well, North Africa with the exception of Egypt has historically been tied to its African roots and its Mediterranean heritage. The People of North Africa (Morocco, Algeria, Tunisia, Libya, Mauritania, Northern Mali (Azawad), and North-East Niger (Agadez), as well as small parts of Chad, Burkina Faso, and even Nigeria), are historically Amazigh People. To this day, despite centuries of assimilation, Arabization, and the constant barrage of propaganda led by Arabo/Islamists across the Middle East and the Gulf region, our people are still keeping their Amazigh heritage, their culture, and their language.

Historically, North Africa with its Amazigh identity has been a rampart against the Middle Eastern/Arab invasions and was largely liberated from the Islamic Empires of the East as soon as the mid-8<sup>th</sup> Century. Since then, the region has been ruled by Amazigh Empires that extended their rule to the borders of Egypt, and as South as Senegal and as North as Southern Spain, Italy, etc... While many people immigrated to North Africa throughout the ages and were well integrated into the society, the bulk of the society retained the

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Amazigh genetics and the Amazigh culture, traditions, food, clothing, music, folklore, pottery, artisanal crafts, etc... As a matter of fact, North Africa made significant contributions to the Western Civilization throughout the first Century BC all the way to the late 400s. Great minds such as St. Augustine were born and bred in North Africa. North African Empires led by Amazigh dynasties held off the advance of the Ottoman Empire by allying themselves with European powers of the time, hence present day Morocco was never part of the Ottoman Empire.

North Africa has seceded from the Middle Eastern based Empires of the Omayyad's, Abbasids since the get go and kept their independence until the late 19<sup>th</sup> century when European powers started chipping at their Empire and colonizing it. The rivalry between the Middle East based powers and North Africa has been there for centuries. After the late 50s independence movements, the Arab nationalists in the Middle East set out to reconquer North Africa, this time by pushing Arabization and denying the Amazigh people their language, culture, and identity. Recently, the Gulf States and their Islamist allies took over the mantle from the Arab nationalists and started pushing and imposing their own version of Islam on the People of North Africa. North Africa has always advocated and stood for tolerance between various ethnic and religious groups. It is no accident that a sizable Jewish population lived and thrived in North Africa for Millennia.

We the Amazigh people are freedom lovers, defenders of the rule of law, and are committed to freedom of speech, freedom of worship, and democracy. Including us as part of the MENA region is diluting our identity, alienating our people, and making us part of a foreign political-entity that has been hard at work denying our people the right to live freely in their own land, use their own language, culture, names, and above all their freedom to shape their future. We identify ourselves as North Africans, our region is part and parcel of Africa and while we had interactions with the Middle East, we do not share their vision, approach, and objectives.

The Amazigh people all over the World identify with a culture, a language, a heritage that goes back 1000s of years, and a culture that interacted with the World, and that incorporates many aspects of the World culture. Our people are well integrated within the US and other Democratic countries and share the same philosophy when it comes to Human Rights, Democracy, Freedom, and Liberty.

I strongly urge you and your team to reconsider this classification and do the right thing, which is to give the people of North African descent an opportunity to regain their identity and keep it as pristine as it was for Millennia, while enriching the culture of this great country of ours where we live, the Grand Old USA.

The Arab Community Center for Economic and Social Services (ACCESS) writes this letter to express strong support for the U.S. Census Bureau's plan to test a Middle East and North Africa (MENA) category, as part of its 2015 research for content improvements to the 2020 Census.

ACCESS is the largest Arab American human services agency in the country. We are headquartered in Dearborn, Michigan, among the most highly concentrated Arab American community in the nation. In 2004, ACCESS launched the National Network for Arab American Communities (NNAAC), a network of 23 Arab American organizations in 11 states.

As an organization that predominantly serves the Arab American community and provides technical assistance and programming for Arab American organizations across the country, we know firsthand the significance of inclusion in Census data. More accurate counts will allow us to more accurately assess specific programming and government resources that can better serve, empower and integrate Arab communities in the United States. While Arab Americans have been immigrating to the United States for over a century, we are still seen as "white." With the current political environment as it is, we are aware of the many unique challenges and needs that are particular to our community. However, we are unable to address these challenges through identification within the "white" category.

Because no designation currently exists on Census forms for individuals who trace their roots to the MENA region, we remain an "invisible" community. **No community should be invisible.** Including the MENA classification in the Census will help address the vital needs of our communities, provide more accurate and inclusive data collection, bring to light the status and needs of these communities, serve as a resource to policy makers, federal and local officials, function as an ethnic category instead of a racial one to include those who identify with many racial backgrounds.

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Finally, we would like to voice our support for the inclusion of the category on the form as a distinct question on ethnicity, as opposed to the presence of the category in a combined question format. We maintain that persons from the MENA region, much like those of Hispanic origin, identify with many racial backgrounds and that ethnicity is the appropriate approach to this new category. We support the importance of testing a category for a growing American ethnic population that is mostly invisible in federal statistics and reports, and yet remains hyper-visible in our country's political, policy, law enforcement and security arenas. We believe accurate and inclusive data collection on the MENA population will inform policymakers, federal and local officials, service organizations, and the public on the status of these communities, their needs, and the assets they bring to local, national and international issues.

We greatly appreciate the efforts of the U.S. Census Bureau to test this new category. ACCESS is eager to continue to working alongside the Bureau throughout the testing process that may lead to the creation of the MENA Category. We are confident that our partnership will prove fruitful for the federal government and for the Arab American community.

I am writing to you today to express my strong support for the movement to create a new US Census category for individuals of Middle Eastern and North African descent. The Arab and North African communities across this city and nation are diverse, and our experiences – our challenges, our successes, our perseverance – are diverse as well. Despite this, we remain uncounted. The Arab immigrant population is the fastest growing immigrant population in Brooklyn – yet we do not receive institutional acknowledgement that our communities, our heritage, or our identities are distinct from those of Anglo-Americans.

The Arab-American Family Support Center is the first and largest Arabic-speaking social service agency in New York City. For over 20 years we have provided culturally and linguistically sensitive services to Arab immigrants and their families. We strive to provide our communities with the most comprehensive, effective, and meaningful service possible, but there are barriers to our success. Our invisibility as a community is one of them. Without access to basic information about the communities with whom we work, we lack grounding knowledge about the lives and livelihoods of our community as a whole, our neighborhoods specifically, and how the individuals we serve fit into the broader social landscape. Because our communities remain invisible, our organizations, advocates, and allies struggle to identify what strategies are successful, what services are effective, and what progress we have made.

By adding the MENA category to the 2020 Census, we will be able to access data and information about a largely unconsidered and marginalized population that will be instrumental in our efforts to empower and support our Arab and North African communities.

We are responding to the Federal Register notice regarding the Census Bureau's plan to test a Middle East/North Africa ethnic category as part of its 2015 research for content improvements to the 2020 Census.

The Arab American Institute supports the Census Bureau's endeavor and encourages the Bureau to use a comprehensive geographic definition of the MENA region by including the population with origins in:

- a. **League of Arab States:** Algeria, Bahrain, Comoros, Djibouti, Egypt, Iraq, Jordan, Kuwait, Lebanon, Libya, Mauritania, Morocco, Oman, Palestine, Qatar, Saudi Arabia, Somalia, Sudan, Syria, Tunisia, United Arab Emirates, and Yemen.
- b. **Non-Arab MENA States:** Turkey, Iran and Israel
- c. **Sub-national communities:** Assyrians, Chaldeans, Kurds, Berber.

We maintain that persons from the MENA region (much like those of Hispanic origin) identify with many racial backgrounds and that ethnicity is the appropriate approach to this new category. We support the importance of testing a category for a growing American ethnic population that is mostly invisible in federal statistics and reports, and yet

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remains hyper-visible in our country's political, policy, law enforcement and security arenas. We believe accurate and inclusive data collection on the MENA population will inform policymakers, federal and local officials, service organizations, and the public on the status of these communities, their needs, and the assets they bring to local, national and international issues.

We further advise the Census Bureau to revise the examples it provides in the notice in order to represent the diverse communities from the MENA region in a more equitable manner. Currently, North African examples are over-represented and do not correspond with the relative population size. Additionally, important regions in the Middle East are not mentioned (e.g. the Gulf). Finally, subnational and transnational groups are not listed. In particular, we recommend that the Census Bureau list examples that correspond with the following six categories:

1. **The Levant:** We suggest listing Lebanon due to its large size. Should the Census Bureau wish to list also Syria; that decision should not be done at the expense of other origins.
2. **North Africa:** We recommend listing only Egypt. But should the Census Bureau wish to list also Morocco; that decision should not be done at the expense of other origins.
3. **Sub Saharan Africa:** the current examples ignore non-white Arabs (specifically Sudan, Somalia and Mauritania). We recommend listing either Somalia or Sudan in the examples.
4. **Gulf States:** We recommend listing Yemen as an example.
5. **Non-Arab MENA:** we recommend keeping Iran as an example due to its large size.
6. **Sub-national ethnicities:** Assyrians, Kurds and Berber are not listed. The Assyrian/Chaldean community is a significant member of our coalition and a historic community in Middle East. Additionally, they are the largest in this group.

We look forward to hearing from you about the future Census Bureau plans to research, test and implement a MENA category.

[Multiple Submissions]

We are writing to express the strong support of the Arab American Institute for the Census Bureau's plan to test a Middle East and North Africa category as part of its 2015 research for content improvements to the 2020 Census. As you well know, there is currently no ethnic category for Americans from the MENA Region on the U.S. Census. This has led to a significant undercount of Arab Americans, creating barriers to many basic rights and services. The creation of a coherent ethnic category for the MENA region will have a positive impact on the treatment and services available to members of our community by addressing the longstanding undercount that has served as a barrier to representation, education, health, and employment. New and expanded data provided by the inclusion of a Middle East and North Africa checkbox on the 2020 Census will arrive at a better count of our community and ensure greater access to necessary resources.

In order to capture the most accurate count of Arab Americans, we encourage the Bureau to use a comprehensive geographic definition of the MENA region that includes the population with origins in member nations of the League of Arab States as well as Turkey, Iran, Israel, and several sub-national communities. We believe this definition of the population of the Middle East and North African region will provide the most comprehensive data on the region's diverse community, capturing the multiple racial, national and sub-national identities of the region. The full list of included groups is as follows:

- a. **League of Arab States:** Algeria, Bahrain, Comoros, Djibouti, Egypt, Iraq, Jordan, Kuwait, Lebanon, Libya, Mauritania, Morocco, Oman, Palestine, Qatar, Saudi Arabia, Somalia,

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Sudan, Syria, Tunisia, United Arab Emirates, and Yemen.

b. **Non-Arab MENA States:** Turkey, Iran and Israel.

c. **Sub-national communities:** Assyrians, Chaldeans, Kurds, Berber.

We further advise the Census Bureau to revise the examples it provides in the notice in order to represent the diverse communities from the MENA region in a more equitable manner. Currently, North African examples are over-represented and do not correspond with the relative population size. Additionally, important regions in the Middle East are not mentioned (e.g. the Gulf). Finally, subnational and transnational groups are not listed. In particular, we recommend that the Census Bureau list examples that correspond with the following six categories:

1. **The Levant:** We suggest listing Lebanon due to its large size. Should the Census Bureau wish to list also Syria; that decision should not be done at the expense of other categories we suggest below.
2. **North Africa:** We recommend listing only Egypt. Again, should the Census Bureau wish to list also Morocco that decision should not be done at the expense of other categories.
3. **Sub Saharan Africa:** Current examples ignore non-white Arabs (specifically Sudan, Somalia and Mauritania). We recommend listing either Somalia or Sudan in the examples.
4. **Gulf States:** We recommend listing Yemen as an example.
5. **Non-Arab MENA:** We recommend keeping Iran as an example due to its large size.
6. **Sub-national ethnicities:** Assyrians, Chaldeans, Kurds and Berber are not listed. The Assyrian/Chaldean community is a significant member of our coalition and a historic community in Middle East. Additionally, they are the largest in this group.

Finally, we would like to voice our support for the inclusion of the category on the form as a distinct question on ethnicity as opposed to the presence of the category in a combined question format. We maintain that persons from the MENA region, much like those of Hispanic origin, identify with many racial backgrounds and that ethnicity is the appropriate approach to this new category. We support the importance of testing a category for a growing American ethnic population that is mostly invisible in federal statistics and reports, and yet remains hyper-visible in our country's political, policy, law enforcement and security arenas. We believe accurate and inclusive data collection on the MENA population will inform policymakers, federal and local officials, service organizations, and the public on the status of these communities, their needs, and the assets they bring to local, national and international issues.

We would like to express our thanks for the crucial role the Census Bureau has played in pushing forward the testing of this new category. The Arab American Institute will continue to work alongside the Bureau throughout the testing process in the effort to create the MENA Category. We are confident that our joint efforts will result in a better count of our community.

[Multiple Submissions]

On behalf of the Population Association of America's (PAA) Committee on Population Statistics (COPS) and Association of Population Centers (APC), we are pleased to respond to the notice in the December 2, 2014 *Federal Register* requesting comments regarding the 2015 National Content Test.

PAA and APC believe that the successful conduct of the 2020 Census is vitally important to the health and well-being of America's communities, large and small. For the next

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decade, apportionment of seats in the House of Representatives, legislative redistricting, the allocation of federal funds, and informed decision-making at all levels of government and in business rely -- directly or indirectly-- on the results of the 2020 Census.

The following comments are divided into two sections: 1) those that concern efforts to test a variety of contact strategies for optimizing self-response, better ensuring the coverage of persons in households, and providing language support for census respondents; and 2) those that concern the testing of content related to relationship as it concerns married-couples and unmarried partners, and questions related to race/ethnicity.

**Contact Strategies**

The PAA and APC support the Census Bureau's efforts to increase self-response and provide language support as part of its strategy to improve census accuracy and contain costs. The logistics of delivering questionnaires, the timing of reminders, and their mode of delivery (postcard, letter, email) are understandably complex and require empirical validation before they are employed. Of special interest is the supplemental contact frame, where email addresses will be tested as a potential supplement or replacement for postcard reminders.

The PAA and APC think that it is useful for the Bureau to think creatively about how best to address the problem of counting everyone in a household that should be counted, and reduce the incidence of erroneously reporting persons who have a "usual home elsewhere" (e.g. college students in dorms). Comparing the current "rules-based" approach, where the Census Bureau provides a set of definitions (aka "rules") on who should be included on the census form with a more "open" approach, where a series of questions help the respondent (and the Bureau) determine who should be listed on the household roster, could prove to be very useful. This is akin to recommendations made by the National Research Council Panel on Residence Rules in the Decennial Census. In their report, "Once, Only Once and in the Right Place", the Panel recommended reducing the burden on respondents by gathering information through a series of "guided questions," as opposed to having residence determined solely by instructions to the respondent, which are frequently not read (National Research Council, 2006). The current testing moves in this direction and seeks empirical evidence of viability within existing census operations. One potential problem is that the new approach in the 2015 test relies on an extensive series of guided questions that are interactive in nature and, as such, are consistent with computer-assisted methods of data collection, and not with data collection using paper forms. Thus, this advance may heighten differences by mode of data collection in new ways, an issue that needs to be addressed before methods are formally adopted for 2020.

Finally, the PAA and APC endorse the testing options for providing language assistance because these tests will help shed light on the best strategies for optimizing response from those respondents who are not proficient in English. Eliciting compliance to the census has become more problematic in many areas of the nation, as immigrants with limited English proficiency settle well beyond the historical immigrant-receiving states. The best course of action, however, may require a considerable number of tailored approaches, based on the groups represented and their geographic locations. The test should provide the Census Bureau with data that can inform decision-making along these lines.

**Content - Relationship and Race/Ethnicity**

The PAA and APC believe that testing a new relationship question that integrates gender with relationship for married-couples and unmarried partners is a good idea whose time has come. Previous research on the 2010 Census showed that the identification of same-sex married couples using a two question approach (i.e. sex and relationship to householder) was seriously compromised by errors in the reporting of sex (O'Connell and Feliz, 2011). The PAA and APC believe that the testing of a combined sex-relationship question, with specific categories for same-sex married couples and unmarried partners has great potential to reduce these errors. Especially important are the diagnostic checks being performed for consistency between the separate identification of respondents as being male or female and their responses in the combined sex-relationship question. Conducting follow-up on inconsistent responses can prove to be very valuable in the ultimate determination about the efficacy of the combined question.

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The PAA and APC applaud the Bureau's efforts to provide respondents with a greater opportunity to report their detailed race and ethnicity. This step will make the census more inclusive and relevant in an era where the nation is becoming increasingly diverse as a result of immigration from many different countries. The PAA and APC believe that the decennial census should test options that provide information for race and ethnic categories that are not only mandated by the Federal Office of Management and Budget, but are essential for the conduct of policy research, program planning and implementation, and the social science research that undergirds our understanding of differences by race, ethnicity and origin.

For decades, data users have been provided with numbers for detailed Asian and Hispanic subgroups from the decennial census short form, but no detail on subgroups that may be included under white and black race categories. Around census time, local census partners have often been in a difficult position to explain why someone who is Chinese gets to list themselves in detailed fashion, while those who are Jamaican or Irish do not. This has become an especially important issue starting in 2010, with the decoupling of the long form from the decennial census. Some groups (e.g. Black West Indians) feel overlooked as a result of their seeming inability to report their detailed race/ethnicity within the existing race/Hispanic categories. The spirit of inclusiveness that is actively promoted by the Census Bureau around the decennial census could be compromised in some communities because of this issue.

After reviewing the results of the 2010 Alternate Questionnaire Experiment (AQE), the PAA and APC believe that the one-question option likely holds the most promise regarding the collection of more detailed information on racial/ethnic origins. Increased reporting detail and lower item non-response are among the results that provide at least tentative support for the single question approach (Compton et al., 2013). Moreover, the results of cognitive testing and focus group research have shown that the one-question approach is perceived as more equitable. Still, given the importance of race/ethnicity as part of the decennial census, the PAA and APC fully support the Census Bureau's efforts to provide more definitive evidence regarding the viability of the measurement alternatives, in the form of this large and comprehensive test.

The PAA and APC acknowledge that including write-in options under the existing five categories may be insufficient for the purposes of providing more sub-group data, since respondents from the Middle East or North Africa may not associate themselves with any of these existing categories. Therefore, the PAA and APC believe that there is a real need to test the efficacy of a separate Middle Eastern or North African (MENA) category.

In an effort to be more inclusive, the PAA and APC applaud the Census Bureau's efforts to gather data on the efficacy of the terms "race," "ethnicity" and "origins." However, this needs to be done, not only as it relates to instructional materials, but potentially as part of the actual question wording. In the context of the Bureau's efforts to be more inclusive, it should consider the possibility that the extensive use of the word "origins" in instructional materials may portend its usefulness in the actual question wording.

Finally, the use of different modes for data collection holds much promise for eliciting high levels of response while containing costs. As the Census Bureau is well aware from previous experience, even seemingly small changes in question wording or in the logistics of data collection can have important impacts on how individuals respond. In the area of race and ethnic data collection this is especially true, as evidenced by the big impact of a seemingly small change in the examples provided as part of the write-in portion of the Hispanic question in 2000. Therefore, the PAA and APC would like to underscore the importance of evaluating test results for race and ethnicity by mode of data collection in the test. This should promote a better understanding of differences between Internet-based self-response (with prompting for subgroups), versus response via other methods of collection, especially those involving paper questionnaires.

Thank you for this opportunity to comment on the 2015 National Content Test.

[Multiple Submissions]

On behalf of The Leadership Conference on Civil and Human Rights, a coalition charged by its diverse membership of more than 200 national organizations to promote and protect the civil and human rights of all persons in the United States, we appreciate this opportunity to provide comments in response to the Department of Commerce's

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Request for Public Comment. The Leadership Conference provides a powerful unified voice for the various constituencies of the coalition: persons of color, women, children, individuals with disabilities, gays and lesbians, older Americans, labor unions, major religious groups, civil libertarians, and human rights organizations. We are pleased to offer for the record a report from our sister organization, The Leadership Conference Education Fund, "Race and Ethnicity in the 2020 Census," which examines the potential implications of proposed revisions to the 2020 census race and ethnicity questions for continued, effective implementation, monitoring, and enforcement of civil rights protections.

The Leadership Conference views an accurate and fair census, and the collection of useful, objective data about our nation's people, housing, economy, and communities, to be among the most important civil rights issues of our day. We have a long record of first-hand experience working in support of previous censuses, and for the 2010 Census, undertook the most comprehensive and extensive effort by a stakeholder organization to promote participation in historically hard-to-count communities and to mobilize local advocates in support of a fair and accurate census by highlighting the civil rights and social justice implications and community benefits. In addition, The Leadership Conference conducts advocacy on various data-related issues, such as sufficient funding resources for the American Community Survey (ACS).

The measurement of race, ethnicity, and national origin in the census, ACS, and other bureau surveys is of particular importance to The Leadership Conference and its members. Generally, we support the collection of detailed data that illuminate the diversity within racial and ethnic groups; these data give public and private sector policymakers the tools necessary to understand and address the disparate needs of all communities. We have followed closely the 2010 Census Alternative Questionnaire Experiment Program, as well as subsequent analysis and research efforts, and want to ensure appropriate and timely opportunities for The Leadership Conference to review and comment on the development of possible revisions to the race and ethnicity questions. We also are interested in how and when the Bureau will utilize the ACS as a vehicle for testing any proposed revisions to the race and ethnicity questions and other methodological and operational changes.

While we applaud the Census Bureau for recognizing the need to reevaluate race/ethnicity questions at a time of ongoing demographic change, we also want to be sure the census and ACS continue to produce data that are useful in the implementation, enforcement, and monitoring of this nation's civil rights laws.

The Education Fund's report, "Race and Ethnicity in the 2020 Census," is the culmination of The Leadership Conference and The Education Fund's year-long project to examine the Census Bureau's research and testing program from the perspective of civil rights stakeholders and to ensure that any revisions to the 2020 census race and ethnicity questions continue to yield data that support the advancement of fairness and equity in all facets of American life. The report describes specific uses of census race and ethnicity data for the implementation, monitoring, and enforcement of civil rights laws, regulations, and policies, in a number of important arenas. The report also outlines civil rights stakeholder goals and concerns with respect to the collection and reporting of race and ethnicity data in the next decennial census. It concludes with a set of recommendations for both the Census Bureau and OMB, encompassing suggestions for further research and testing, ways to strengthen the partnerships between these agencies and the civil rights community, and principles to guide final decision-making on this critical aspect of the 2020 census.

We stand ready to work with you to ensure that the voices of the civil and human rights community are heard in this important, ongoing national conversation. If you have any questions about these comments, please contact [redacted].

[Multiple Submissions]

We are writing in regards to the Comment Request Notice for the 2015 National Content Test (Federal Register/Vol. 79, No. 231) and to express our sincere appreciation of the efforts undertaken by the Census Bureau to ensure a more accurate accounting and classification of our community. We also bring to your attention specific items of concern based on our assessment and the responses we received from our grassroots.

The Lebanese Information Center (LIC) is the largest Lebanese American grassroots organization and has been actively involved in the focus groups discussions and preparations



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leading up to the current proposal for the NTC. In a letter addressed to the OMB in June 2013, the LIC maintained that the MENA classification with country of origin subgroup, that is, a classification that is based on geographically-defined origins, does indeed merit further discussion and careful consideration. However, the LIC also noted that the overwhelming majority of members of the Lebanese American community radically oppose being defined by a racial ethnicity or clustered under a general ethnic umbrella (Arabs, Levantine, etc.) that misrepresents their heritage, and that they have, “for numerous decades, preferred to remain unclassified than to be misclassified.”

Upon receiving the Comment Request Notice, we forwarded it to our chapters across 48 States and solicited comments and suggestions from the community. The following is a summary of the main points we received and that our organization adopts:

1. A better accounting of the sizeable Lebanese American community is a welcome initiative as long as it does not imply that Lebanese Americans will be aggregated under a racial ethnicity or clustered under a general ethnic umbrella. The Lebanese American community, the largest, oldest and most integrated community with Middle Eastern roots, does not self-identify with any singular regional ethnicity nor does it necessarily share the supposed grievances of other groups from the region.
2. We believe that the use of the MENA category to imply a race or ethnicity is inappropriate – People from the MENA region do not share a common race or ethnicity and hence the category should not be used to imply such commonality. We believe that using the term “origin” instead of race is more appropriate here. We do note the qualitative focus groups’ findings that the use of this term is potentially “confusing or misleading to many respondents,” but we do believe that it is appropriate in this setting since it would imply a geographically contiguous area rather than race or ethnicity.
3. The MENA category, if adopted, should have a clear definition based strictly on a demarcated geographical area and the example groups should reflect that. Examples should not include countries or areas that are not part of this geographical definition such as West African or Sub Saharan countries simply because they share or are perceived to share some pan-nationalist identity. Including, for example, Mauritania, Somalia or Comoros in the example groups simply because they are members of the Arab League would only serve to confuse and potentially alienate members of our community.
4. Sub-National ethnicities or groups whose presence extends into but is not limited to the MENA region (Berbers, Armenians, Assyrians, etc. ) should not be included in the example groups. Doing so would muddy the definition of MENA, create unnecessary confusion, and limit the choice of members of these ethnicities who do not self-identify under MENA.

We sincerely hope that our comments would prove helpful in your efforts and, again, reiterate our sincere appreciation of the Bureau’s initiatives and goodwill towards our community. Please do not hesitate to contact us if we can be of any further assistance.

The Census Bureau is violating my 5TH Amendment Right to Equal Protection of Law by refusing to acknowledge my Ethnic background. My Race is not white, because my Race is Slavic. Many Citizens whose Ancestry comes from Eastern Europe are of the Slavic Race. Citizens whose ancestry come from Russia, Poland, Ukraine, Czechoslovakia, and Yugoslavia are of the Slavic Race. People of the Slavic Race share a common language, religion, cuisine, and history. Citizens of the Slavic Race have different cuisine, language, and history than Citizens whose ancestry are from France, Germany, or England.

My ancestor were told that Citizens of my generation would never be able to read, speak, or write English. If the Census Bureau was truly interested in Diversity, then the Census Bureau would included all Ethnic Groups in it's Ethnic Classification.

Now that the Census Bureau is looking to change the Ethnic Classification for the 2020 Census, the Census Bureau should do the RIGHT THING and include all Ethnic Groups like the Slavic.

Unfortunately no designation currently exists on the census form for individual who trace their roots to the Slavic Race. The accurate and inclusive data collection on the Slavic

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Population in the U.S.A. will serve as resource to policy makers, federal, state, and local official, public institutions, service organizations, and the public in assessing the status and needs of Citizens of the Slavic Race.

This MENA category needs no special census identification and the MENA category should NOT be counted in the US Census. There should be no special treatment or funding or protection for MENA as an ethnic classification.

Please eliminate this MENA classification consideration for the US Census Bureau.

I am definitely in favor of adding the "MENA" race classification to be used for the next census taking place in 2020.

It is important that all racial, ethnic, and other populations be included in the census.

To me, this is what our country "is all about."

[Multiple Submissions]

I am writing to express my rejection of the new classification of the people of North Africa by the U.S. Census Bureau for the 2020 Census. I call on you for the exclusion of the population of North Africa from the postulated MENA ethnic classification. The people of North Africa identify with their Amazigh (Berber) ethnic identity and are African, not Middle Eastern.

The "MENA" ethnic classification has been pushed forward by an Arab/Islamist lobby in an attempt to exploit the large numbers of Americans of North African decent to further political and religious agenda in the Middle East. However, the Amazigh North African community is well integrated in the American society and has its own concerns regarding peace and development in North Africa and we seek to promote democracy and human rights in that region. The MENA classification also segregates North Africans in Morocco, Algeria, etc. from those of the same ethnic backgrounds in Mali, Niger and Burkina Faso (Touareg) with which we share the same ancestry, language and cultural heritage. Such segregation is both culturally inappropriate and demographically incorrect.

The inclusion of North Africans within a MENA, "Arab" classification will only alienate our future generations by subjecting them to a foreign politico-religious entity, which as also attempted to assimilate our indigenous and secular identity within North Africa. I believe that here, in the United States, we have the right to self-identify and express our cultural values.

I believe that our Amazigh and North African communities can only be classified as "North African" or "African," and we categorically reject the MENA inclusion.

Thank you for giving me the opportunity to voice our concerns.

I am writing in support of the addition of a new classification for people from the Middle East and North Africa region by the U.S. Census Bureau on the 2020 Census. I call on your support for the testing of MENA as an ethnic classification. People from the MENA region identify with many racial backgrounds. Unfortunately, no designation currently exists on the census forms for individuals who trace their roots to the MENA region. We effectively remain an "invisible" community which as left us undercounted and underrepresented. A MENA classification will also allow many sub-national minority communities (i.e. ) Assyrians, Chaldeans, Kurds, Berbers, etc. that originate from this region to self-identify.

I believe that accurate and inclusive data collection on the MENA population in the U.S. will serve as a resource to policy makers, federal and local officials, public institutions, service organizations and the public, in assessing the status and needs of these communities.

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I am writing in support of the addition of a new classification for people from the Middle East and North Africa region by the U.S. Census Bureau on the 2020 Census. I call on your support for the testing of MENA as an ethnic classification. People from the MENA region identify with many racial backgrounds. Unfortunately, no designation currently exists on the Census forms for individuals who trace their roots to the MENA region. We effectively remain an “invisible” community, which has left us undercounted and underrepresented. A MENA classification will also allow many sub-national minority communities that originate from this region to self-identify. I believe that accurate and inclusive data collection on the MENA population in the U.S. will serve as a resource to policy makers, federal and local officials, public institutions, service organization and the public, in assessing the status and needs of these communities. Thank you for your contributions in the development of this new category.

I am against a special designation for Arab Americans on any future Census.

This proposal is divisive and represents an heir of the US-controlled Japanese concentrations camps of the 1940's. To even ask for voluntary inclusion from individual shows a smell of hatred towards mostly Christian citizens that have integrated into American society mostly over 100 years ago.

Arabs are white by definition, make up only about 1.2M Americans and are mostly Christian in the US. No state currently has more than 1% of its population in this category, so it's ridiculous to state that Arabs would get special recognition for government spending, etc.

The US may need to tally data on Muslims within the nation's borders due to recent events. If Islam is perceived as a threat to the US, work with immigration officials to keep them from entering US borders. Keep them out.

Please keep in mind the world-wide dynamics and problems between Arabs and Jews, Semites of the same genetic disposition. Don't get caught in the trap of taking sides in these complex dynamics. The Mediterranean region consists of Arabs, Israelis, Greeks, Italians, Spaniards and so much more who are closely related in genetic make up.

The question isn't race/ethnicity, but RELIGION. Begin tracking Islam, Judaism, Chinese and Indian eastern religions, as well as other nationalistic religions of those entering the US. Fortunately, Homeland Security is doing an excellent job of this.

Again, it's a question of RELIGION, not race/ethnicity. Don't insult or create a negative atmosphere for Arabs or any other of the above listed ethnicities that have so well integrated into US society and have been here for generations.

The undersigned organizations are grateful for the opportunity to comment on the Census Bureau's 2015 National Content Test. We applaud the Bureau's continuing efforts to improve the efficacy of the relationship question. We urge the Bureau to build on this success by considering the needs of the LGBTQ community in its efforts to increase self-response, integrating sexual orientation and gender identity cultural competency into its training, moving forward with sexual orientation and gender identity demographic questions, and tailoring the question-based approach to capture more homeless youth.

**I. Continued Testing of the Revised Relationship Question, Including as Part of the Reinterview Process**

We are encouraged to hear that the Bureau is continuing to test its revised relationship question, which modifies the “husband or wife” and “unmarried partner” categories to distinguish between same-sex and opposite sex relationships. We understand that these changes will significantly improve the quality of same-sex couple data, and will resultantly improve development of policy concerning same-sex couples and their families.

We urge the Bureau to include the revised relationship question in the reinterview process. As indicated in the Federal Register notice, because the incidence of some household relationships is relatively low, testing with large, representative samples is essential to ensuring that the question is capturing various household types accurately. Integrating the new relationship content into the reinterview process will improve the Bureau's confidence in the efficacy of the question.

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**II. Consider LGBTQ Communities in Planning for Increased Use of Technology to Improve Self-Response**

The Census Bureau's increased use of technology is an exciting development, but may have mixed results for lesbian, gay, bisexual, transgender, and queer (LGBTQ) and homeless youth communities if not accurately tailored. Because LGBTQ people—and especially LGBTQ people with intersecting minority identities like race, ethnicity, or immigration status—are disproportionately low-income, they may have less regular access to the Internet. In a study of LGBTQ community centers, the Movement Advancement Project and CenterLink reported that only 23% of patrons who used the centers' computers had access to a computer at home, and only 39% had access to a smartphone that connects to the Internet.

1 However, to the extent that web-based tools are used to increase self-response, studies of Internet usage may provide the Bureau with insight into how best to reach the LGBTQ population. For example, the Bureau should consider making any web-based tools mobile or smartphone accessible as research shows 56% of those LGBTQ individuals with smartphones prefer to connect via mobile than laptop or desktop. 2 In addition, Pew Research Center reports that LGBT people use social networking sites at higher rates than the general public (80% compared to 58%), so Internet-based outreach efforts should include social networking sites.

The homeless population continues to be a group that is difficult for the Census Bureau to accurately count. Increased reliance on self-response through the Internet is likely to be even more complicated for LGBTQ homeless youth. To highlight the difficulty, a recent study conducted among a sample of homeless youth in Los Angeles finds that 62% of adolescents owned a cellphone (Rice et al., 2011b), though only 40% of those surveyed owned a working phone and 15% reported that they were out of minutes. While some of the adolescents had access to a shared (7%) or borrowed (15%) phone, 22% did not have any form of access.<sup>3</sup>

We recommend that the Bureau consider several technical options that would not only benefit the LGBTQ homeless population but other homeless populations and individuals who rely on mobile phones or smartphones as their only source to access the Internet. The Bureau should ensure that all surveys are easily accessible and optimized on mobile devices and should limit the amount of data sent and received (transmission) to complete the surveys. The Bureau should also consider using text surveys where a mobile user initiates and completes the survey completely over text. By incorporating heavy mobile accessibility, the Bureau will extend the reach of surveys and meet individuals where they are.

**III. Integrate Sexual Orientation and Gender Identity Cultural Competency Into Training**

Cultural competency training for non-response follow-up (NRFU) staff is a necessary prerequisite to collecting accurate data on the LGBTQ community. Left untrained, NRFU staff may unwittingly alienate or offend respondents, potentially eliciting false replies from respondents who would otherwise honestly and willingly answer the relationship to householder question. Recent studies indicate that respondents rarely refuse to answer sexual orientation identity questions. In fact, one study found that refusal rates for sexual orientation identity questions (0.8% to 2.6%) were measurably lower than refusal rates for income questions (4.23% to 6.11%).<sup>4</sup> Still, if NRFU staff is not adequately trained, they may prompt social desirability bias in the respondents they interview.

We encourage the Bureau to integrate LGBTQ cultural competency training into any existing training modules for NRFU staff. In order to ensure that such training is effective, we recommend the Bureau include community stakeholders in the training development processes.

**IV. Add Sexual Orientation and Gender Identity Demographic Questions to Current and Subsequent Content Tests**

While the Census question regarding relationship to reference person will now include response options for same-sex partners, the Census still tells us nothing about the sexual orientation of people who are single or do not live with a partner. Current estimates of the size of the LGBT population vary widely, from as little as 1.7% to as much as 5.6% of the U.S. population identifying as LGBT,<sup>5</sup> and studies find a greater number reporting same-sex attraction or sexual behavior with someone of the same-sex.<sup>6</sup> There are a limited number of state and federal surveys that include questions about sexual orientation and almost no population-based surveys that include questions about gender

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identity. Based on a 2012 Gallup survey finding that 3.4% of adults identified as LGBT, conservative estimates put the number of LGBT adults in the United States around 9 million individuals.<sup>7</sup>

Some federal agencies are rectifying the lack of data collection on sexual orientation and gender identity. For example, the Department of Health and Human Services (HHS) is beginning to collect information on the LGBT community as part of its implementation of the Affordable Care Act (ACA). Section 4302 of the ACA requires data collection on health disparities. While sexual orientation and gender identity data collection is not explicitly required, the Section does require data collection on sex. HHS has developed a data progression plan for collecting sexual orientation data and has conducted gender identity collection listening sessions as part of its compliance with the new law.

In their 2014 report on Advancing LGBT Health and Well-Being, the HHS LGBT Issues Coordinating Committee detailed progress on the commitments laid out in the Data Progression Plan. Among their achievements, the Committee reported that:

- Centers for Disease Control (CDC) added a question on sexual orientation to the National Health Interview Survey (NHIS) in 2013, and subsequently published a report based on information gathered in that survey;
- HHS developed and tested questions on sexual orientation and gender identity for the Behavioral Risk Factor Surveillance System (BRFSS) and implemented them as an optional module for the 2014 version of BRFSS;
- Substance Abuse and Mental Health Services Administration (SAMHSA) completed pilot testing of sexual orientation questions for use on the 2015 National Survey on Drug Use and Health (NSDUH); and

Health Resources and Services Administration (HRSA) included a question on gender identity in the 2013 and 2014 National Health Service Corps Patient Satisfaction Survey and the 2014 NURSE Corps Participant Satisfaction Survey.

HHS plans to continue this progress in 2015, committing to actions including:

- Pretesting a question on sexual orientation for inclusion in the Medicare Current Beneficiary Survey;
- Implementing a new question on gender identity in the Population Assessment of Tobacco Health Study;
- Including questions on gender identity in HRSA's upcoming Health Center Patient Survey;
- Adding a question on sexual orientation to the National Survey of Older Americans Act Participants;
- Implementing new sexual orientation questions in SAMHSA's National Survey on Drug Use and Health; and
- Including sexual orientation and gender identity measures in SAMHSA's new Common Data Platform.

We strongly encourage the Bureau to take necessary steps to integrate the sexual orientation question currently being used on the National Health Interview Survey into the Census. This question has been rigorously tested and successfully fielded. Because a thoroughly tested question already exists and is currently being used on other data collection instruments, we believe the next logical step is to move this question into larger surveys like the Census. We urge the Bureau to take this necessary step, and to immediately include sexual orientation in the Census.

In tandem, we encourage the Bureau to immediately update the Census to include survey questions that capture respondents' gender identity. Sexual orientation and gender identity are separate aspects of an individual's identity; data on gender identity are equally necessary to understanding the unique disparities impacting transgender Americans.

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Data should be collected on both gender identity and sexual orientation in order to fully study the needs of the transgender community.

Transgender people are not only more likely to face discrimination in employment, housing, and places of public accommodation, but are also disproportionately likely to experience violence, to live in extreme poverty, to contract HIV, to go without preventive care, and to attempt suicide.<sup>8</sup> While the existing body of research has helped policymakers, researchers, service providers, and advocates begin to address these concerns, many aspects of the needs and experiences of transgender people remain unexplored. Collecting more high-quality data on the disparities transgender people experience and other social, economic, and health concerns of transgender

communities is essential if federal, state, local, and nonprofit agencies are to adequately serve transgender people. Improved data are also necessary to allow researchers to better understand the backgrounds and needs of transgender people and to help transgender advocates and their allies develop effective strategies for improving the circumstances of transgender people's lives.<sup>9</sup>

While the Bureau has not conducted content field-testing of the gender identity question, gender identity has been included on several other national censuses, including in the United Kingdom and Canada. Additionally, the Department of Health and Human Services (HHS) has added a gender identity question to the BRFSS optional modules and plans to add gender identity to the NHIS, SAMHSA's Common Data Platform, and other survey instruments in the near future. Accordingly, we urge the Bureau to immediately update the Census to include questions that capture respondents' gender identity to ensure adequate representation and appropriate protection of the needs of this particularly vulnerable community. To the extent that the Bureau requires internal testing of a question, we urge the Bureau to conduct preliminary testing immediately, followed by integration of a gender identity question in the 2016 Content Test.

V. Question-based approach and homeless youth

The undersigned support continued testing of the "Question-Based" approach to improving coverage. According to the U.S. Interagency Council on Homelessness, youth experiencing homelessness are underrepresented in national data, in part because they lack a safe and stable place to call home. Use of a "question-based" approach may help the Bureau to capture more of these individuals in the 2015 Content Test. To that end, we recommend that the Bureau include a question that would apply to homeless youth. In efforts to develop a question that adequately captures this population, we urge the Bureau to integrate LGBTQ homeless youth direct service providers.

The undersigned organizations appreciate the Census Bureau's strong leadership on LGBTQ issues, as well as its continued testing of the revised relationship question. We encourage the Bureau to adopt the recommendations included in this comment. If you have any questions about the content of this comment, please contact [redacted].