

Response to the FRN seeking research suggestions for the 2030 Census, submitted on behalf of 27 organizations that serve low income families and other vulnerable populations

These comments are submitted on behalf of the undersigned organizations, which advocate for or serve low-income families and other vulnerable populations. Many of these populations have had significant numbers of their communities missed in past Censuses. As requested, we have addressed the specific topics the Bureau suggested in A through E. We also included an additional section, F, which includes other suggestions.

A. Reaching and motivating everyone

1. We commend the Bureau for its research on how much of the undercount of young children is due to entire families not responding, how much is due to responses that just leave young children off, and how much is due to leaving off units within the household such as adult siblings and their children. We recommend that the Bureau conduct similar research on other undercounted populations such as people of color. We believe that many people of color may also be left off the census response when the household they live in responds to the census.
2. The Bureau should conduct research investigating why, in the 2020 Census, response rates in predominantly Black and Hispanic tracts dropped. Recent research suggests that this was a significant problem.
3. Research conducted by many advocacy groups suggested that the single biggest motivating force for getting people to respond to the census was the impact of accurate data on improving funding for their communities. It was our observation that this was also a powerful message for persuading policy leaders and other stakeholders to engage in outreach activities.
4. We recommend the Bureau conduct additional research on “rostering”: who people will include in their response and what messages will persuade them to count everyone they are supposed to.
 - a. We suggest research on how best to convey the idea that the following people should be counted:
 - i. Nonfamily members such as family member partners, friends, or renters.
 - ii. People who are temporarily in the household but have no permanent residence.
 - iii. People who split their time among two or more residences such as homeless people who are “couch surfing” or children in shared custody situations.
 - iv. People who are staying in the household but who are legally part of another.
 - b. The Bureau should also conduct research to test which words best convey that the respondents should count everyone—“household” may imply family members but leave out others that should be counted under the law. Words such as “residence” and “at this mailing address” might be good options to test.
5. Complete Count Committees across the nation played important roles in reaching everyone. We recommend that the Bureau conduct research with stakeholders, especially those who led or participated in Complete Count Committees, on how to improve the Bureau’s resources on forming and working with Complete Count Committees. Now many of those stakeholders are still in the positions they held in 2020, but they may not be later. We have also offered non-research suggestions around Complete Count Committees below.
6. The communications research for 2030 should include the following:
 - a. The communications research should investigate the barriers to responses with more detail.
 - i. For example, research showed that families were concerned about the release of their data to private actors, particularly landlords. This was particularly true

for larger households. Many people with low incomes live in doubled-up housing, and people from many cultures prefer to live in larger family groups; the fear of more than allowed numbers of people in the residence being exposed could result in many families leaving some household members off the form. We encourage the Bureau to research which private actors respondents are concerned about, and what messages reassure them that their data is secure from these actors.

- ii. We know that immigrants' fears were heightened in the 2020 Census process. The Bureau should test messages and messengers that would best reassure that the decennial census does not ask about immigration status and is prohibited from sharing any data about it.
 - b. More broadly, we encourage the Bureau to test different messages about the safety of the data when collected. Research by the Partnership for America's Children suggested that general language about confidentiality being protected by law was not as persuasive as specific mention of the potential penalty imposed on government staff for revealing the data (that is, the size of the potential fine and maximum prison time), because the penalty is so strong. Updating this research is particularly important because there is reason to believe that people are if anything more distrustful of authorities now than when the research was conducted.
7. We ask the Bureau to research how to "unduplicate" multiple responses from the same address without removing real people if neither response includes anyone from the other response. We are concerned that the deduplication process may have weeded out legitimate responses if there was no cross-over of household members on both forms. When multiple family units reside in one residence, the primary householder might fill out the return just for the people they consider part of their family and another family may have filed a "non-ID" census response for the address just with their own family. The deduplication process should accept both household responses in this situation. Thus we ask the Bureau to research how different families respond and when they would not count other members, and how the nonhouseholder would respond. We also ask the Bureau to research what additional resources, such as administrative records, could be used to confirm that both responding households legitimately live at the same address.

B. Technology

1. We want to warn about the risks of excessive reliance on newer technology. Recent research (Robinson et al. 2022) suggests that while self-response rates in census tracts where Non-Hispanic Whites are the majority populations and easy to count groups are prevalent increased in the 2020 Census compared to the 2010 Census, self-response rates in census tracts where historically undercounted groups were the majority population were lower in 2020 than in 2010. The evidence indicates self-response rates decreased in census tracts where Blacks and Hispanics were the majority population. The trend between 2010 and 2020 reverses a trend seen between 1990 and 2010 where response rates in hard-to-count tracts increased more than self-response rates in easy-to-count tracts. One reason for this dichotomy may be the new internet option that was provided in the 2020 Census. Accordingly, we ask the Bureau to research who used the online response option, who used the written response option, who used the phone option, and who responded during the Nonresponse Follow Up (NRFU) process, broken out by race, ethnicity, and presence of young children.

2. We recommend testing older and less common versions of technology to make sure they are readily usable and compatible with Bureau technology. Lower income people often use older phones, laptops, and browsers and may not have access to the latest versions. There is market share data available for both phones and browsers that can be used to identify the full range of phones and browsers that should be tested.
3. Create an embeddable tool for websites and other digital resources that partners can use to make it easier for people to fill out the Census.

C. *New data sources.*

1. We recommend that administrative records be used as a back-up measure when households cannot be counted, or to complete information on who lives in the household, but should not replace self-response or NRFU efforts. Self-response is generally the most accurate response, and we know that administrative records use a variety of different definitions of household members, so using administrative records instead of self-response and enumerator interviews could result in less accurate results. Administrative records can play an important role in filling in the gaps for missing or incomplete survey responses or reconciling multiple responses.
2. We recommend that the Bureau research the option of using administrative records to identify young children or other family members missing from Census responses and add them to the individual household responses collected during self-response and NRFU. Since many young children are left off when adults self-respond, using administrative data to add children to individual Census records would be potentially a good way to improve the count of young children. We think this may also be true for other historically undercounted groups. It is important that the Bureau conduct research to identify strengths or gaps in specific administrative data sources for their accuracy in including more household members, taking into account race, ethnicity, age, gender, or other factors.

D. *How we contact respondents.*

We strongly recommend contacting each residence in person multiple times, especially in locations where families are more likely to work long hours, unpredictable hours, weeknights and weekends, or varying hours (increasing numbers of employers are using just-in-time scheduling where people receive their work schedule shortly before they need to work.) This means that multiple tries at multiple different times are essential for reaching someone at home. We understand that in 2020, many households were enumerated after only one in-person outreach when administrative data was available for that address. But administrative data for an address may well not include everyone living at that address that should be counted under the census household definition, so it is preferable to make more efforts to have an enumerator talk to someone in the household. In order to help the Bureau determine how many visits are needed, we recommend that the Bureau research how many households were successfully enumerated in NRFU through direct contact after 1 visit, 2, visits, and so forth, to identify the point where it was no longer fruitful.

E. *Respondent support services*

1. The outreach campaign should be designed to reach individuals with low literacy levels. According to a recent study from the Department of Education, roughly half of U.S. adults, aged 16 to 74 years old — 54% or 130 million people — lack literacy proficiency.”
https://www.barbarabush.org/wp-content/uploads/2020/09/BBFoundation_GainsFromEradicatingIlliteracy_9_8.pdf People who

struggle with reading are more likely to get information from the radio and TV and more likely to respond by phone than on paper or by internet. These households are more likely to be disproportionately low-income, people whose first language is not English, and are more likely to include young children. We recommend working with literacy experts on how best to reach people with low literacy skills and seeking their advice on what research to conduct. We recommend radio and TV ads in English as well as other languages that explain how people can respond by phone so that people with low literacy can learn about the Census and can respond orally. This also means that the Bureau should make sure it has adequate staffing for the phone response option in English as well as in other languages.

F. *Additional Considerations*

1. We strongly recommend that the Bureau include the separate Middle Eastern and North African (MENA) category in the 2030 Census. Including this category as a subgroup under “White” is not what extensive research and consultation has concluded is the best means of counting this population. Arab Americans and others in the MENA category are more likely to have low incomes and are more likely to include young children than the population as a whole, so undercounting them contributes to the failure to allocate funds where they are most needed.
2. We further recommend that the Census Bureau include Sexual Orientation and Gender Identity (SOGI) categories in the 2030 Census, as it has done in the Household Pulse and other surveys. Here, too, categories that match people’s identity will improve participation in the Census.
3. State and Local Complete Count committees were very important in building stakeholder engagement in census outreach in advance of the Census. However, in many states or communities these committees were formed too late, and some states never formed or funded them. We suggest the following:
 - a. Get information out to states and localities in 2026 or earlier about the need to have states and localities support the Census, so that policy makers and advocates can work to get legislation to create these committees in their 2027 legislative sessions.
 - b. The Bureau’s recommendations for Complete Count Committees should include information about reaching undercounted groups and suggest either subcommittees focused on those groups or a process for educating all committee members about reaching those groups.
 - c. We encourage the Bureau to expand the number of languages it makes the census form available in, and to also expand the number of resources that are available in each language online to support responses. This should include videos (designed to be easily viewable on mobile phones) so that people with limited proficiency in English can use the video to fill out the form and get questions answered. States and localities should be encouraged to disseminate the availability of these resources in languages that are used in their communities. We note that materials in all languages need to explicitly state that babies and young children should be included.
4. The Bureau should include external groups in the planning process for the 2030 Census and publicize the opportunities for stakeholder engagement in this process. We particularly encourage the Bureau to share draft communications materials with outside stakeholders to get their advice and input.
5. Lessons from EITC outreach showed that disseminating information through employers and public benefits programs was associated with increased awareness and uptake. While collaborating with business was problematic in 2020 because the Census had become so politicized, it should be more feasible in 2030. We recommend that the Bureau start building

those partnerships now and research what kind of resources would be most useful to employers.

Thank you for the opportunity to submit these comments.

American Muslim Health Professionals
Church World Service
East Bay Housing Organizations
Empower Missouri
Food Bank of Northern Nevada
Futures Without Violence
Human Service Chamber
Island Harvest Food Bank
Jewish Family Service of Colorado
LIFE at RCIL
Musikanten Montana
National Immigration Law Center
National Resource Center on Domestic Violence
National Women's Law Center
nhhc.org
Parent Voices Oakland
Partnership for America's Children
Pennsylvania Head Start Association
Pennsylvania Health Access Network
Public Advocacy for Kids (PAK)
Public Justice Center
San Diego for Every Child
The Advocacy Institute
Tivnu: Building Justice
Voices for Virginia's Children
Women Employed
ZERO TO THREE