

National Hispanic Leadership Agenda

December 9, 2015

Ms. Jennifer Jessup
Departmental Paperwork Clearance Officer
Department of Commerce
14th and Constitution Avenue NW, Room 6616
Washington, D.C. 20230

Re: Request for comments regarding the 2016 Census Test

Dear Ms. Jessup:

On behalf of the National Hispanic Leadership Agenda (NHLA), a coalition of 40 leading national Latino nonpartisan civil rights and advocacy organizations, we appreciate the opportunity to provide comments about the Census Bureau's 2016 Census Test (hereinafter the "2016 Test"). These comments are in response to the proposed information collection published by the Bureau on November 9, 2015, at 80 FR 69188.

The nation's 55 million Latinos are the country's second largest population group, and more than one of every six of the nation's residents is Latino. As important as it already is, the Latino population will continue to increase in size and prominence in the coming years. By 2050, the Census Bureau projects that more than 105 million Latinos will live in the United States, accounting for about 26.5% of the total population. In order for the Census Bureau to compile accurate and useful data 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 various population groups, the undercount of Latinos persists, and was 1.5% in Census 2010. The recurrence of a statistically significant undercount is a serious concern, particularly considering that the 2010 Census produced a 0.8% over count of the non-Hispanic white population. More progress toward a full and accurate count is urgently needed.

As the Bureau has recognized, the 2016 Test is an integral part of the restructuring process for the 2020 decennial Census. The 2020 Census will be different in important aspects from any past Census: it will be conducted primarily online, by a smaller workforce, and may utilize administrative records to augment data compilation. In addition, the Bureau may fundamentally alter questions about respondents' race and ethnicity. The 2016 Test will provide indispensable information for the decision-making that will have a large influence on the quality of data collected in Census 2020. The assessment the Bureau conducts in the 2016 Test is particularly important for the NHLA and the Latino community as a whole, because the two test sites – Los Angeles and Houston – are home to very large Latino populations, including many who are harder-to-count because of their limited English proficiency.

MEMBER ORGANIZATIONS

Alianza Americas
American G.I. Forum
ASPIRA Association
Avance Inc.
Casa de Esperanza: National Latin@ Network
Congressional Hispanic Caucus Institute
Cuban American National Council
Farmworker Justice
Hispanic Association of Colleges & Universities
Hispanic Federation
Hispanic National Bar Association
Inter-University Program for Latino Research
Labor Council for Latin American Advancement
Latino Justice PRLDEF
League of United Latin American Citizens
MANA, A National Latina Organization
Mexican American Legal Defense and Educational Fund
National Association of Hispanic Federal Executives
National Association of Hispanic Publications
NALEO Educational Fund
National Association of Latino Independent Producers
National Conference of Puerto Rican Women, Inc.
National Council of La Raza
National Hispana Leadership Institute
National Hispanic Caucus of State Legislators
National Hispanic Council on Aging
National Hispanic Environmental Council
National Hispanic Foundation for the Arts
National Hispanic Media Coalition
National Hispanic Medical Association
National Institute for Latino Policy
National Latina Institute for Reproductive Health
National Puerto Rican Coalition
Presente.org
SER Jobs for Progress National
Southwest Voter Registration Education Project
United States Hispanic Chamber of Commerce
United States Hispanic Leadership Institute
United States-Mexico Chamber of Commerce
U.S.- Mexico Foundation

One key component of the 2016 Test is the evaluation of a combined question on race and ethnicity, building on the 2015 National Contest Test and the 2010 Race and Hispanic Origin Alternative Questionnaire Experiment (AQE). We continue to 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 their constituents' disparate needs. We also wish to ensure that Census data continue to serve as an effective tool in the monitoring of compliance with and enforcement of civil rights laws. Thus, we emphasize two important overall goals for any revised format eventually chosen for the race and ethnicity questions:

- The format must enable the Census Bureau to maintain or improve upon historical Latino response rates and the accuracy of the data collected. This includes maintaining and hopefully enhancing the quality of data about the Latino community's specific national origin and sub-groups.
- The format must continue to yield, at a minimum, data about residents' racial and ethnic identities that are compatible with and comparable to data collected during the 2010 and previous decennial Censuses.

To meet these goals, we believe the Census Bureau should adopt the following recommendations as it conducts the 2016 Test:

The 2016 Test should include multiple versions of the Hispanic race and ethnicity question: The proposed version of the 2016 Test paper questionnaire will only include one version of the combined question format of the Hispanic race and ethnicity section. We are concerned that testing only one version of the question will result in unreliable data, and will not allow us to compare the effectiveness of other formats, including those tested in the 2010 AQE. Therefore, we urge the Census Bureau to test multiple formats of the Hispanic race and ethnicity question to obtain more data on which format and wording will yield the most complete and accurate information.

The 2016 Census Test should include evaluation that will enable the Bureau to improve the accuracy of Latino national origin and sub-group details: For the Latino community, it is critical that at the minimum, any redesign of race and ethnicity questions does not diminish the quality of data collected about specific Latino national origin and sub-groups. In this connection, the Bureau must ensure that testing takes into account and is able to obtain accurate information from Latinos who may choose to report multiple ethnic, national origin or sub-group identifications. For example, to help capture data about the Afro-Caribbean community, we encourage the Bureau to include Afro-Caribbean as one of the examples under the "Black or African Am." category in the responses to Question 8.

Moreover, as noted above, the 2016 Test paper questionnaire includes only one version of a combined question on race and ethnicity, and the version includes only one checkbox for each major response group, followed by just sixteen spaces on one line for respondents to provide their detailed national origin or sub-group identification. This format does not include instructions or provide a feasible opportunity for respondents to indicate more than one national origin or sub-group identification, and may result in the loss of important information about respondents and their family backgrounds. While we understand that there may be challenges with the amount of space available for additional instructions and response opportunities in the paper questionnaire, it should be easier to surmount these challenges with the online version. Thus, we recommend that the online version have questionnaire formats which have multiple check boxes for the major Latino national origin and sub-groups, similar to the format of the Census 2010 question on Hispanic origin. In addition, online, and insofar as possible in print, the Census Bureau should provide additional space for national origin and sub-group reporting, and clarify that respondents should write in each and every group with which they identify.

Alternate formats for race and ethnicity questions must be tested with Spanish-dominant residents: In order to answer pertinent concerns left unaddressed by previous tests of race and ethnicity question formats, the Bureau should test a range of approaches to gathering race and ethnicity data with Spanish-dominant residents. We commend the Census Bureau for preparing 2016 Test print and online forms and other materials that will enable respondents to answer the questionnaire and seek assistance from the Bureau in Spanish, and strongly advocate that the Bureau send bilingual forms, letters, and other materials to every household chosen for the 2016 Test, in every instance in which mail contact is attempted. We urge the Bureau to, in addition, conduct some of its planned focus groups with Spanish-dominant 2016 Test respondents, and to include in questions to be asked of all focus group participants inquiries about residents' responses to the race and ethnicity question and the terms used therein.

The Bureau must carefully investigate the reliability of race and ethnicity data in administrative records: The 2016 Test is a crucial opportunity for the Census Bureau to investigate the value and limitations of data in administrative records concerning individuals' race and ethnicity. When, in the course of the 2016 Test, the Bureau compares the content of administrative records to Non-ID responses and to data gathered through ongoing non-response follow-up operations, we strongly encourage it to dedicate attention to the rate of disparity between respondents' self-identification and the racial and ethnic data contained in administrative records or predicted by modeling based on administrative records. We remain concerned that Latino residents may be underrepresented in administrative records under consideration for use in Census enumeration. In particular, we note that 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 harder-to-count residents, are unlikely to appear in the types of administrative records the Bureau proposes to use. We urge the Bureau to avoid any use of administrative records which appears likely, after testing, to create disparate results for traditionally hard-to-count communities, or diminishes the quality or accuracy of data on the Latino population.

NHLA member-organizations are pleased to support the Census Bureau in conducting the preparation and testing necessary to ensure that the 2020 decennial Census provides the most full and accurate data possible on the nation's rapidly growing Latino community. We thank you for your attention to our recommendations for the 2016 Test.

Sincerely,



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