

**FUNDERS' COMMITTEE
FOR CIVIC PARTICIPATION**
PEOPLE | PHILANTHROPY | POWER

November 14, 2022

Ms. Shannon Wink
Program Analyst, Policy Coordination Office
U.S. Census Bureau
Washington, DC 20233

Submitted via www.regulations.gov

RE: Docket Number USBC-2022-0004, Stakeholder engagement on development and implementation strategies that improve the way people participate in the 2030 Census

Dear Ms. Wink,

We write in response to the August 17, 2022, Notice in the *Federal Register* soliciting input or suggestions on 2030 Census preliminary research. We appreciate the opportunity to bring the perspective, expertise, and experience of philanthropy to bear on the design of the 2030 Census.

The Census Equity Initiative (CEI) is a philanthropic collaborative of hundreds of funders that came together to spearhead a nationwide campaign to ensure a fair and accurate 2020 Census, particularly in historically undercounted communities, and continues its work looking towards the 2030 Census. The grantmakers that participate in CEI, large and small, come from across the country, giving hundreds of millions of dollars each year to advance the common good and improve the quality of life in the United States. These foundations have different funding priorities, are ideologically diverse, and do not always agree with each other. But we share a common interest in a fair and accurate census, eliminating the persistent, disproportionate undercount of certain population groups, and providing access to demographic data, particularly data that can address equity issues. CEI is steered by a committee of some of the nation's most prominent national and regional foundations: Annie E. Casey Foundation, Bauman Foundation, Carnegie Corporation of New York, Ford Foundation, Heising-Simons Foundation, Joyce Foundation, The JPB Foundation, Open Society Foundations, Robert Wood Johnson Foundation, Rockefeller Brothers Fund, Unbound Philanthropy, Wallace H. Coulter Foundation, and W.K. Kellogg Foundation. (Note: These comments are being submitted on behalf of the CEI as a whole and not on behalf of any of the individual members noted here).

The Funders' Committee for Civic Participation (FCCP), an active part of the philanthropic collaborative, is a network of grantmakers who share an underlying conviction that all people deserve a voice in our democratic process. We work to dismantle unjust systems and structures, and shift power to communities that have long fought for inclusion. FCCP's commitment to racial justice and to achieving a

democracy where all communities are counted, resourced, and represented necessitates our deep engagement on the American Community Survey (ACS) and census. Through outreach, education, and mobilization, FCCP's Funders Census Initiative (FCI) engages philanthropy, with a particular focus on state and local funders, to leverage their resources and power in support of a fair and accurate count.

Across the varied institutions represented by CEI and FCCP is a shared commitment to reliable and accurate data as a necessary foundation for a well-functioning government, a robust civil society, and thriving business sector in the United States — all centered in the fair allocation of political representation and public resources at the federal, state, and local levels. As funders, we rely on accurate census data to help identify community needs and prioritize grantmaking, and our grantees rely on accurate census data to serve and advocate for communities, especially those that have been undercounted historically at disproportionate rates, through their work on various issues including poverty, health care, criminal legal system reform, racial equity, education equity, climate change, and infrastructure improvement.

Based on philanthropy's significant investment and involvement in the 2020 Census, we are pleased to offer research recommendations and design ideas to improve the fairness and accuracy of the next decennial count. Key to achieving that goal are trusted messengers at the national, state, and local levels. Philanthropic engagement in census activities is designed to support these trusted voices, through partnerships and resources, as they offer public education and technical assistance within their communities to other census partners, respondents, and Census Bureau job seekers alike.

Thorough research is important early in the decennial census cycle to ensure evidence-based decision-making related to infrastructure, methodology, and operations in the 2030 Census design. Research should include traditional quantitative and qualitative assessments of new and modified design elements, but must also incorporate opportunities for individual and organizational input and engagement whenever possible, especially from stakeholders representing the interests of population groups at risk of being undercounted in the census.

Our recommendations are grounded in the simple objective of removing barriers to census participation — and especially to cost-effective self-response — for as many individuals and households as possible.¹ At the same time, we suggest ways to improve the flow of information to, and collaboration with, philanthropy, as funders seek to fill in outreach gaps that the census plan is unable to fulfill.

The following recommendations reference a more detailed report, *Looking to Census 2030: Findings and Recommendations from Census 2020 Partners and Funders*, authored by Karen K. Narasaki and Tim Lim.² We also filed the full report separately through the *Federal Register*. Those observations, conclusions, and suggestions were based on philanthropy-sponsored listening sessions and 2020 Census reports and analyses by complete count committees, census policy experts, CEI grantees, and philanthropy networks.

¹ Our recommendations are in bold/italics text throughout this letter to be more easily identified. Text only in bold or only in italics are not recommendations.

² Narasaki, K. and Lim, T. 2021. *Looking to Census 2030: Findings and Recommendations from Census 2020 Partners and Funders* at <https://funderscommittee.org/looking-to-census-2030/>.

I. Reaching and motivating everyone

The Census Bureau is seeking insights on how best to reach historically undercounted population groups and motivate them to respond to the 2030 Census. The foundations we represent at the national, regional, state, and local levels are especially well-positioned to offer recommendations for research to achieve these critical goals, which we share, as the grantees and partners we supported during the 2020 Census were focused on communities that have been or are at risk of being missed in the census.

The Bureau should expand its research into the underlying factors that contribute to the disproportionate undercount of people of color, renters, and young children, and the overcount of the non-Hispanic White population and homeowners. The research should inform new design elements for the 2030 Census that can address the reasons for the persistent differential coverage in the census.

1. Reaching and enumerating households in rural and remote areas and on American Indian reservations and trust lands.

We urge the Census Bureau to redesign and improve outreach and operations in rural areas, on American Indian reservations and off-reservation trust lands, and in Remote Alaska. The 2020 Census Operational Plan did not sufficiently address the range of challenges unique to rural and indigenous areas (including Pacific Islander communities in Hawaii) and broadband deserts, jeopardizing a fair and accurate count of these communities and populations. With half the number of Area Census Offices compared to the 2010 Census, there often were not enough official Census 2020 staff (especially Partnership Specialists) at local events in some states, and there was an inadequate supply of culturally relevant and effective census materials for rural and Indian country events.

Equally important, the Census Bureau must overcome substantial distrust of the federal government among American Indians, which has contributed to the substantial undercount of Native Americans living on reservations. For 2020, the Bureau did not hire enough enumerators living on reservations, nor did it successfully negotiate agreements with most Tribal Nations to facilitate the sharing of tribal government records that could have improved coverage of this population. *(See, also, our comments under “New data sources.”)*

Below, we recommend a number of areas for research and testing to improve participation and the accuracy of the count in rural, remote, and less populous communities. We offer an equally important recommendation related to improving the census in rural and remote communities and in Indian country under “How we contact respondents.”

a. Devote resources to one or more census tests in a rural area and on an American Indian reservation, and ensure that both types of areas are part of the 2030 Census “dress rehearsal.” In the 2020 Census cycle, the Census Bureau was forced to cancel all planned field tests in rural areas and on American Indian reservations and trust lands, including two of three dress rehearsal sites (2018 End-to-End Census Test), due to delayed and insufficient funding. An absence of field tests makes it difficult, if not impossible, to modify and improve enumeration methods in rural and less populous communities in any meaningful way. The Bureau should prioritize research and testing of ways to deliver census packages and reminder materials to rural and American Indian households using the U.S. mail, instead of continuing to require field staff to visit every housing unit in person to verify and update the

address list and hand-deliver self-response packages. (See, also, our comments under “How we contact respondents.”)

- b. Continue to offer and promote the availability of telephone and paper questionnaire response options in 2030.** (See, also, our comments under “Technology.”)
- c. Increase the number of local census offices in rural and tribal areas, and ensure that a sufficient number of partnership specialists — including tribal specialists — with direct, meaningful knowledge of these communities are assigned to build relationships with local stakeholders and civic leaders and to coordinate events designed to educate residents and promote census participation.** The dramatically smaller number of local census offices (called Area Census Offices) in 2020 compared to the 2010 Census left many less populous and geographically vast areas, including American Indian reservations, without an adequate number of knowledgeable partnership specialists to staff local events, provide promotional materials, and answer questions about job opportunities, the operational timeline, and response options. Some specialists assigned to rural areas traveled long distances to help staff informational meetings and Get Out the Count events and were not familiar with the communities where they worked.
- d. Test advertising messages and communications delivery methods that specifically target and reach rural and remote populations.** The Bureau should test messages developed specifically for residents of less populous counties, small towns, American Indian reservations and trust lands, and remote communities, including Remote Alaska. Those messages should include promotion of the telephone assistance lines both as a source of information and a method of self-response. Testing for 2030 also should focus on different ways to deliver rural-focused messages that are most likely to reach residents of these communities, such as radio, local TV stations, and rural newspapers. Venues that allow for delivery of these messages in person, such as houses of worship, community gathering places, and sporting and farming-related events, should be part of the communications plan for rural areas, as well.
- e. In consultation with stakeholder organizations and local officials, develop improved processes to recruit, hire, and train sufficient field and partnership staff in rural and tribal areas.** It is important for local census staff — including Area Census Office staff, partnership specialists, field supervisors, and enumerators — to be from the communities (or types of communities) in which they carry out their responsibilities. Unfortunately, in rural communities and Indian Country, the digital divide created a barrier to a robust hiring effort in areas lacking reliable broadband. There was no formal plan to address the digital divide in rural and certain urban communities, raising concerns that the Bureau might not be able to hire partnership specialists and enumerators familiar with the geography, culture, and community structure in those areas. The Bureau’s decision to move the entire application process online made it difficult for residents in areas with low internet connectivity and computer access to pursue census jobs. As a result, the Bureau was forced to reassign enumerators from cities and even from different regions of the country, to complete the door-to-door visit phase in some rural communities — increasing distrust among residents and creating barriers for field staff unfamiliar with their assigned territories.

Therefore, the Bureau should research and test “lower tech” strategies for recruiting and hiring in rural areas, including partnering with trusted organizations such as 4H clubs, libraries, farm bureaus, and the Alaska Federation of Natives to help people navigate the application process and submit paper applications if necessary, and to provide space for in-person training once successful applicants are on-boarded. The Bureau should also work with educational associations much earlier in the planning cycle to ensure that people working in and attending schools and other educational institutions are aware of the job opportunities that will become available closer to the census year and have access to assistance in navigating the hiring process, if needed.

In addition, a lack of accessible certified fingerprinting centers made it difficult for some residents in rural and remote areas to complete the hiring process and receive a job offer. The Census Bureau should research the accessibility of fingerprinting services for all communities and should develop, in consultation with criminal legal system reform experts and census stakeholders, alternative sources of certified fingerprints — such as from a previous place of employment — in areas where public transportation is limited and fingerprinting services are not easily accessible.

2. Reaching households where English is not the primary language spoken at home.

Convincing households that speak a language other than English at home that it is safe and important to participate in the census is a significant challenge for the Census Bureau. More than 300 languages are spoken in the U.S., yet people could respond to the 2020 Census online or by phone only in 14 languages, with basic outreach materials and advertising limited to those “official” languages, as well. In a stark departure from 2010, paper questionnaires were available only in English and bilingual English-Spanish in 2020 (with the exception of Puerto Rico, where households received Spanish language forms). While assistance guides and sample forms were translated into 59 languages, these resources were only available online, and their availability was not well promoted to the general public. Only one of the 59 languages (Navajo) was American Indian, Alaska Native, or Pacific Islander.

We offer several recommendations below to help the Census Bureau reach and motivate limited English proficient households to self-respond to the census. Additional recommendations for bolstering the actual process of response for language minorities are offered under “Respondent support services” later in these comments.

- a. *Make promotional and informational materials in non-English languages available at the same time as English-language materials.*** Delays in releasing non-English language materials in 2020 put census partner organizations serving immigrant and Native American communities with limited English-proficient households at a disadvantage and left philanthropy in the dark as to where it should invest resources to supplement the Bureau’s catalogue of guides, graphics, fliers, brochures, and videos. The availability of in-language resources should be promoted more effectively and widely through partner organizations, local governments, schools, libraries, community centers, and the like.
- b. *Set local hiring goals and begin consultations early with knowledgeable stakeholder organizations to ensure that the Census Bureau hires culturally and linguistically proficient partnership staff and field staff at the regional level and in all communities.***

3. ***Develop specific messaging to reach individuals and families experiencing housing insecurity, as well as “heads of households” where unhoused people are staying at the time of the census.*** The Bureau should consult with advocates and other experts to gain a better understanding of the population experiencing homelessness and housing instability in sheltered situations (but not in emergency or transitional shelters) and should test messages to help ensure that these individuals and families are enumerated as part of the households that are their “usual residence,” even if temporary, at the time of the census.
4. ***Use the communications campaign to bolster self-response in historically undercounted communities and to create an environment that facilitates cooperation during the Nonresponse Follow-up phase.*** We agree with the Census Bureau’s overarching goal of increasing self-response in all communities, especially those with historically low self-response rates. Evaluations clearly show that self-response enumerations are the most accurate. Equally important to the success of the census, self-response is the most cost-effective method for enumerating households (and, potentially, residents of Group Quarters). Resources for every census ultimately are limited; for every one percent of households that don’t self-respond, the Bureau spends an estimated \$45 million to collect data through the Nonresponse Follow-up Operation — money that could be spent to improve the accuracy of the census in the “hardest to reach” communities, through additional in-language outreach, promotional materials, and hyper-local advertising, for example.

The 2020 Census Communications Campaign successfully incorporated a number of improvements based on lessons learned from 2010. However, the effort continued to focus too heavily on a “diverse mass audience,” instead of targeting specific communities at risk of being undercounted. Specific at-risk communities could be reached more effectively with additional in-language advertising, in combination with English-language advertising in immigrant communities and ad placement in media most likely to reach less-trusting populations successfully, such as ethnic media, in-language newspapers, other non-TV/digital platforms, and out-of-home placements such as ethnic shopping centers and other popular gathering locations.

Philanthropy’s *Looking to Census 2030* report includes numerous specific recommendations to strengthen the next census communications campaign (see pgs. 43 – 53). Here, we lift up several research areas and key design elements that we believe will help the Bureau implement an effective 2030 Census communications campaign.

a. Begin communications campaign research and testing early in the decade, using lessons learned in the 2020 Census as a starting point, with a focus on building a better understanding of how to reach and persuade people from all race, ethnic, and national origin subgroups to respond, including expanded in-language advertising. To support this effort, the Census Bureau should:

- Research effective messaging to overcome fear of misuse of census responses in immigrant communities and low-income communities, as well as many communities of color whose interaction with government authorities is not always positive based on lived experiences of exclusion, segregation in many societal institutions, and violence.

- Increase research into messages and placement most likely to reach and motivate cross-sectional population segments (i.e., age, race and gender combinations) that have been chronically undercounted in the census, such as younger adult Black men who are at risk for being undercounted.
- Research effective messaging that highlights the benefits and safety of census participation, tailored to specific historically undercounted or at-risk communities and population groups, such as rural households, American Indians living on reservations, low-income neighborhoods, people living in public housing or receiving public assistance (who fear that their personal information will be shared with landlords or government agencies, to their detriment), recent and second+ generation immigrants, LGBTQI+ individuals, people with disabilities, and families with young children.
- Research effective messaging to highlight the strict confidentiality of personal census responses in federal law (Title 13, U.S.C.) and the prohibition on using personal and household census responses for any purpose other than producing aggregate, anonymous statistics.
- Research effective ways to reach population segments at risk of being undercounted through communications channels other than television and digital platforms, especially with a hyper-local focus.
- Research effective messaging for “trusted messengers” to use in their own outreach to historically undercounted or at-risk communities and populations, and make materials available to partners engaged in Get Out the Count campaigns at the local level in greater quantities.
- Explore avenues to reach historically undercounted groups through smaller and more local media outlets that are most likely to be trusted sources of information, including ethnic media.
- Ensure that there is sufficient, timely funding within the Census Bureau to develop and manage a robust communications and outreach campaign.

b. Reimagine the traditional communications contract model that centers around a prime contractor focused on diverse mass audience advertising who partners with subcontractors targeting historically undercounted or harder-to-reach population groups.

The traditional approach to the communications campaign appears to assume that communities most at-risk of being missed comprise a small segment of the nation’s population. However, this approach is not effective in the growing number of states and communities where so-called “hard to reach” population groups comprise a majority of individuals and households that must be counted. The Census Bureau should rethink its communications campaign framework and approach to reflect this reality and ensure that the contract model does not foster financial conflicts of interest that prevent adequate advertising resources from being directed towards improving response in communities and among population groups at greatest risk of undercounting, through expanded audience segmentation.

For the 2030 Census, the Bureau should include culturally appropriate English-language advertising targeting specific immigrant communities, such as Hispanic and Arab American households, as well as in-language advertising for larger American Indian tribes and Alaska Native groups, South Asian subgroups, and Native Hawaiian and Pacific Islander subgroups, at a minimum.

- c. *Begin outreach and targeted communications to historically undercounted and at-risk communities and population groups early in 2029.*** We understand that the Census Bureau must strike a balance between allowing sufficient time to roll-out and implement a robust, comprehensive outreach and promotion campaign, to build meaningful awareness of the census, and starting these activities too early to sustain the attention and interest of the public in advance of the enumeration itself. A full-fledged advertising campaign is necessarily centered around peak census operations, with timing guided by thorough research. However, targeted outreach and promotion to historically undercounted communities and populations at risk of undercounting should begin a full year before the mass advertising campaign. This timeline acknowledges the fact that it takes longer to build the awareness and trust necessary to create a sense of “ownership” of a fair and accurate census and take advantage of multiple opportunities to educate diverse households and communities about the importance of participating.

- 5. *Strengthen capacity of the Office of Strategic Alliances (OSA) to maintain an effective evergreen partnership program, including permanent national, regional, and tribal partnership specialists, and begin hiring decennial census partnership staff several years before Census Day.*** There is widespread agreement among stakeholders, including philanthropy, that an “evergreen” partnership program is essential to engage civic and community leaders meaningfully in the effort to eliminate differential undercounting in the census. While the Census Bureau has taken tentative steps to implement such a program, by establishing the OSA and hiring regional tribal specialists, it has not yet allocated the resources needed to ensure effective relationships with key organizations, particularly at the regional and local level. Moreover, increasing resources would enable staff to also work with partners on targeted outreach for the American Community Survey.

During the decade between each census, without consistent outreach and relationship building, institutional memory about the census and past engagement is lost in the government, corporate, philanthropic, and nonprofit sectors at the national, regional and local levels. The barriers to persuading households to participate are likely to increase in the form of declining public interest in responding to surveys, growing distrust of government, and escalating privacy concerns. For communities at risk for undercounting, mobilization of trusted voices is the key to engagement and, ultimately, participation, which requires a much longer time frame and more resources than the Bureau provided for 2020.

The Bureau should establish and maintain relationships, throughout the 2030 Census planning cycle, with the business community, educational institutions, and organizations and providers serving families and children in historically undercounted communities, among other sectors, to elevate the importance of the census and census data throughout the decade, thereby creating a strong foundation for collaborative Get Out the Count efforts before and during peak census operations. Furthermore, the Bureau should increase the number of tribal specialists to more effectively work with tribal governments on the ACS, as well as plan for the 2030 Census and

begin hiring temporary partnership specialists throughout the country three or four years before the next census starts, to ensure sufficient lead time to help states and localities establish Complete Count Committees and to engage nonprofits and civic leaders more effectively in census outreach and promotion efforts.

As the Bureau addresses the hiring of partnership specialists, it should also clarify the role of the specialists and the territory each person covers, and ensure that local partners are informed as to who they are and how to contact them. The information about duties and regions, as well as how to contact the partnership specialists, should be available through the Bureau's website. These steps would help ameliorate a problem many state and local partners identified: difficulty in contacting the appropriate partnership specialist and understanding the roles they can play.

- 6. *In consultation with Congress, the nonprofit sector, and philanthropy-serving organizations, research the possibility of providing financial support to nonprofit organizations that promote and help facilitate census participation as trusted messengers in historically undercounted communities or to historically undercounted population groups.*** A public-private partnership between the Census Bureau (or Commerce Department, which has grant-making capabilities) and trusted messengers at the community level can strengthen the ability of nonprofit organizations to convince reluctant or fearful households to respond to the census. Also consider the role of philanthropy and state governments in establishing a successful public-private partnership program, including a model that incorporates matching grants, to leverage philanthropic dollars and encourage state investment in Get Out the Count campaigns.
- 7. *Strengthen the Complete Count Committee infrastructure, to engage state and local officials as equal partners in the census effort.*** The Census Bureau should evaluate best practices of 2020 Census Complete Count Committees (CCC). The presence and effectiveness of CCCs in states and localities during the last census was uneven, due in part to a lack of interest among some elected officials and in part to a lack of adequate resources to devote to such an effort. Well-organized, inclusive CCCs can be valuable partners in promoting the importance of an accurate census to their respective communities, and valuable sources of information and conduits to trusted voices for local Census Bureau staff. The Bureau should take the following actions to improve the role and effectiveness of CCCs in the 2030 Census.

 - a. *Begin communication with state, tribal, and local governments on creating Complete Count Committees earlier in the decade.*** No later than 2025, the Bureau should prepare a guide documenting best practices and providing further guidance for establishing effective CCCs; by mid-decade, the Bureau should begin distributing the guide to state, local, and tribal governments and community-based partner organizations, to encourage early consideration of resource needs (which often require involvement from state legislatures and city councils) and preparation for Get Out the Count campaigns. The Bureau should partner with government associations (e.g., U.S. Conference of Mayors, National Governors Association, National Association of Counties, National Association of Towns and Townships, National League of Cities, National Congress of American Indians, National Conference of State Legislatures, and similar organizations) to distribute the guide, highlight its importance, and host webinars to educate state, local, and tribal officials about organizing a CCC and working with legislative bodies to secure funding, if necessary.

b. In consultation with Congress and the Commerce Department, explore the possibility of creating a grant program to incentivize states, tribal governments, and localities to establish CCCs for the 2030 Census.

8. *Improve the Census Bureau’s ability to recruit, hire, train, and retain sufficient field staff who live in communities most likely to require significant follow-up visits, based on historical self-response patterns, by starting consultations with stakeholders (including tribal consultations) early in the decade, bolstered by ongoing research into labor force trends.* While increasing self-response is an important goal for the 2030 Census (and one we share), there inevitably will be households that do not respond on their own and that require one or more follow-up visits during the massive Nonresponse Follow-up Operation. Hiring and retaining a sufficient number of well-trained enumerators (and supervisory field staff) who know and understand — culturally and linguistically — the communities in which they work is essential to convincing reluctant or distrustful residents to complete an interview. Community-based partner organizations can help identify qualified applicants with the requisite local knowledge and language skills for all census jobs, helping to spread the word about census job opportunities and the application process.

9. Questionnaire content.

One barrier to motivating every person residing in the U.S. to participate in the census is the absence of inclusive categories for the most basic demographic questions, such as race and sex. *Simply put, people are more likely to respond if they “see themselves” in the questionnaire and believe that they count!* Further, what we measure matters and is a reflection of our nation’s priorities. Expanded response options in demographic questions will generate better data that captures our understanding of the country’s diverse population.

For philanthropy, it is important for the census to produce inclusive data that help funders understand and address, through prudent investments, programs that promote equality of access, opportunity, and treatment in all social institutions, including the health care system, education, housing, the labor force, and the criminal legal system. Therefore, we strongly recommend timely research and carefully designed testing — building on work already done, and as needed — to ensure appropriate modifications to census content in 2030. This process should include engagement with individuals and institutions who represent the communities being measured. The American Community Survey should be viewed as an important test-bed for these updates, as well.

a. Improve the collection of data on race and ethnicity to ensure representation for more race and/or ethnic groups and the accuracy of data collected and published, in coordination with the Office of Statistical Policy, Office of Information and Regulatory Affairs, OMB, which is responsible for setting federal policy on the collection and reporting of race and ethnicity data.

- Continue to research and test appropriate wording and formatting of a combined race and ethnicity question that includes a new category for people of Middle Eastern and North African descent, to ensure the collection and reporting of accurate data on these vital demographic topics. The Census Bureau should seek input from stakeholders throughout the process, to help minimize respondent confusion around the race and

ethnicity question(s), which arose in the 2020 Census (and, presumably, previous censuses).

- Clarify the rules for tabulating multiple race and ethnicity responses in a combined question, to ensure that reported identities are fully captured in published data and that published data fully represent all categories that respondents select, in a clear, consistent, and transparent manner.

b. Increase the collection of data on sexual orientation, gender identity, and variations in sex characteristics (SOGI-SC) in the 2030 Census and other census surveys, to support the monitoring and enforcement of civil rights laws that prohibit discrimination based on these personal characteristics.

- Research, test, and propose question(s) on SOGI-SC for the 2030 Census.
- Research the possibility of expanding the response categories in the sex question, which currently only offer the limited traditional options of male and female, also in close consultation with stakeholders representing relevant communities.
- Use evidence based on findings from the Household Pulse Survey (HPS) questions and from the recommendations made by the 2022 National Academies of Science, Engineering, and Medicine (NASEM) report to inform work to test, develop, and propose SOGI-SC measures to be used in the 2030 Census.
- The research agenda should include, but not be limited to, determining effective formatting and terminology and appropriate methods for gathering this potentially sensitive information from households and individuals that don't self-respond, as well as from residents of Group Quarters. The Bureau should also use the NASEM report's recommended testing priorities as a roadmap for engaging in additional research and testing to improve gender identity measures, including allowing individuals to identify as nonbinary, and the use of standalone measures for data collection on people with intersex traits, especially on household-based surveys.
- The Census Bureau should consult with advocates for the LGBTQI+ community, experts in measuring the characteristics of this community, and LGBTQI+ individuals as it plans, implements, and evaluates the results of research and testing of new 2030 Census questions.

c. In consultation with tribal governments (and their representatives) and the Department of the Interior, improve the accuracy of response options for American Indian and Alaska Native tribes in the online race question drop-down menu for respondents selecting American Indian or Alaska Native. Representatives of Tribal Nations reported an incomplete or inaccurate list of tribes in the 2020 Census race question "write-in" drop down menu for respondents to indicate their tribal affiliation. The Census Bureau should reach out to Tribal Governments to identify their preferred name to ensure the accuracy of the list to include in the 2030 Census online questionnaire.

II. Technology

The Census Bureau is interested in ideas for using technology to make census response more user-friendly and to promote self-response among more households, especially those in communities with historically low self-response rates. We recognize that internet self-response is a cost-effective and secure way to participate in the census, and we agree that continued efforts to increase the number of households that are able to respond online and to improve the online experience should be a priority for the 2030 Census research and testing program.

Therefore, we offer several recommendations to help enhance this design element, with a goal of improving census accuracy for historically undercounted and at-risk of undercounting populations. At the same time, the Bureau must recognize that some households will continue to be more comfortable using the telephone or a paper questionnaire to respond, or have reduced access to the online response portal by virtue of the digital divide. *The Bureau must continue to offer other modes of response beyond the internet that are easy-to-use and accessible in 2030, including paper questionnaires and a telephone response option.*

- 1. Research ways to expand online response access for rural and low-income households, whether at home or at easily accessible, high-traffic locations such as libraries, schools, senior centers, community centers, after-school programs, tax assistance programs (such as the Volunteer Income Tax Assistance program), and faith institutions.**
 - a. Create a formal working group to advise the Director on strategies for meeting this goal in a timely way.** The working group should include representatives of state and local governments, the private sector, and the nonprofit sector, as well as other federal agencies with responsibility for eliminating the digital divide and broadband deserts through new federal investments, especially the Federal Communications Commission (FCC) and National Telecommunications and Information Administration (NTIA). The Census Bureau should collaborate closely throughout the 2030 Census planning phase with the FCC and the NTIA, to encourage investments in broadband in historically undercounted communities.
 - b. Prioritize consultation and partnerships with relevant federal agencies, internet providers, technology companies, and national and community advocates about ways to ensure broad connectivity for internet self-response in as many households as possible in 2030.**
 - c. Include representatives of the American Library Association, education associations, and other organizations that provide or promote internet access, on the Census Bureau's official advisory committees.**
- 2. Improve automated data collection in rural and remote areas, on American Indian reservations, and on off-reservation tribal lands,** by addressing connectivity issues field staff encountered in communities with low broadband penetration during the 2020 Census Local Update of Census Addresses, Update/Leave, and Nonresponse Follow-up Operations.
- 3. Increase the number of languages in which households can respond online, prioritizing the languages offered with guidance from ACS data on language spoken at home.** Cost savings realized from increases in internet self-response can offset any additional costs associated with developing online questionnaires in additional languages and processing the responses. More

households that speak a language other than English at home will consider cost-effective internet response if they can do so in the language they use most often; census partners can successfully promote internet response to these households, as well, with expanded language choices.

- 4. *Work with census partners to improve interactive maps, such as the Response Outreach Area Mapper, to guide the development of targeted outreach and promotion campaigns and to facilitate tracking of census progress and deployment of local resources in real time to encourage response.*** The [CUNY Hard-to-Count](#) interactive map provided useful data in the lead-up to the 2020 Census that helped nonprofit and governmental partners focus outreach efforts, especially because stakeholders could access information about the demographic characteristics and relevant census operations from a single map for each census tract. The interactive map was also used to refine deployment of resources during the self-response phase to reach historically undercounted populations. The Bureau should work with census stakeholders and CUNY to develop an interactive map that better reflects the needs of census partners. The interactive map should be available in multiple languages.
- 5. *Research ways to use email, texts, automated phone messages, and any emerging direct communication avenues, to prompt households to respond to the census,*** short of offering links that could lead to scams and undermine confidence in the census process. For the 2020 Census, the Census Bureau was understandably concerned that bad actors would use email, texts, and phones as platforms to scam vulnerable people — including seniors, low literacy households, and limited English-proficiency households — into sharing personal information. Therefore, the Bureau decided not to use these communication modes to push out reminder messages to nonresponding households. However, the Bureau is successfully using texts and emails to contact some or all households in the American Community Survey and Household Pulse Survey samples, which suggests that testing the use of these modes, as well as automated telephone calls (within legal boundaries), to encourage self-response or even cooperation with enumerators in the decennial census is a worthwhile effort.
- 6. *Continue to work closely with technology and social media companies and civil rights organizations throughout the decade to strengthen protections against the circulation of misinformation and, especially, disinformation before and during the 2030 Census.***
- 7. *Ensure, through ongoing research, testing, and consultation with technology companies, that the 2030 Census online response portal works well on a range of devices and operating systems,*** especially older devices and systems that might still be widely used in some communities that are more likely to have low self-response and higher undercount rates.
- 8. *Develop improved digital, interactive census tools designed to help stakeholders target outreach, track response rates, and monitor the progress of Nonresponse Follow-up,*** by consulting with external experts on features that are user friendly and comprehensive, and with stakeholders on data and indicators that would best guide their Get Out the Count efforts.

III. New data sources

The Census Bureau is seeking suggestions for additional sources of data and ways to use those data to improve operational efficiency and data quality. We recognize that the 2030 Census design is likely to

incorporate an expanded use of administrative records, to improve the accuracy and efficiency of the count and to contain costs. We agree that, at a time of declining survey response rates, increased mistrust of government in some communities, and persistent resource constraints, administrative records from other federal agencies, state and tribal governments, and commercial sources can help ensure a more complete, efficient decennial census.

At the same time, through our work with a wide range of stakeholder organizations (e.g., our grantees) during the 2020 Census, we are keenly aware that many communities fear a misuse of their personal information when government agencies share data. Of equal concern, we know from experts that administrative datasets might exclude the very population groups that are more likely to be missed through traditional counting methods. For example, IRS 1040 tax returns do not always capture young children, who are consistently missed at disproportionately high rates in the census, accurately or at all for newborns. Other federal programs that might be a source of data for missing household or characteristics responses are only available to U.S. citizens, thereby excluding non-citizen immigrants who are at risk of being missed in the census. *The Bureau must not allow increased use of administrative records to complete the decennial census to produce greater inequities in the census results!*

Therefore, as the Census Bureau continues to explore additional data sources to improve the accuracy of the 2030 Census, we urge ongoing, meaningful consultation with privacy experts, civil rights advocates, and other stakeholders to address the challenges noted above. Below are additional specific recommendations for the use of administrative records.

1. ***Continue and expand research into the quality and coverage of administrative databases, to assess suitability for supplementing direct enumeration of households in the 2030 Census.*** The primary focus should be on ensuring that historically undercounted population groups or groups at risk of undercounting — such as undocumented immigrants, other noncitizens, young children, and housing insecure individuals and families — are accurately and equitably represented and captured in administrative databases that would be used for these purposes. Research should assess the degree to which each record and the collective records accurately include the communities historically undercounted and at risk of being undercounted, including the degree to which race and age are accurately captured for various racial and ethnic communities.
2. ***Research the availability of administrative records to facilitate counting incarcerated persons at their home addresses.*** The philanthropic organizations we represent strongly support an end to prison gerrymandering, which requires a change to the census Residence Criteria and Residence Situations that would count incarcerated persons, including detained juveniles, at their pre-incarceration home addresses for purposes of apportionment and redistricting. It is essential that the Census Bureau promptly begin to research methodologies and data sources to accomplish this goal for the 2030 Census.
 - a. The Bureau should consult with federal, state, and local criminal legal system agencies, as well as other experts and advocates in the field — including the formerly incarcerated — to identify datasets that include home addresses for incarcerated persons, as well as demographic characteristics data, such as race, ethnicity, and age, for this population.
 - b. The Bureau should research methodologies to reallocate persons incarcerated in correctional facilities, including detained juveniles, to their home addresses for inclusion in

the statutorily required state population totals used for congressional apportionment and detailed population counts transmitted to the states for redistricting under Public Law 94-171.

- c. The Bureau should test operational modifications required to implement a Residence Criteria and Residence Situations change for the 2030 Census that would count incarcerated persons, including detained juveniles, at their pre-incarceration home address.

3. Research the availability of administrative records and alternative databases to improve coverage of persons experiencing homelessness in shelters and unsheltered situations. In every census, the enumeration of people experiencing homelessness who live in sheltered facilities or stay in outdoor locations is problematic and difficult. Administrative databases maintained by localities, in particular, could be important tools in improving the coverage of this population.

- a. In consultation with advocates, service providers, state, local, and tribal governments, and other experts — including people experiencing or who have experienced homelessness — the Census Bureau should research federal, state, and local databases, such as Homeless Management Information System (HMIS) records, and alternative “counts,” such as the HUD-required Point-in-Time (PIT) counts, that could replace or supplement efforts to enumerate persons experiencing homelessness during the Group Quarters Operation.

4. Research a wider range of databases to improve the accuracy of the Master Address File (MAF). The Master Address File establishes the universe for the census and, thus, is an essential part of a complete and accurate enumeration. The census is more likely to miss residents of housing units and group quarters that are excluded from or miscoded on the MAF, and double-count residents of units that appear on the MAF more than once because of duplicate addresses. To improve the accuracy of the MAF, the Census Bureau should:

- a. Work with Congress to identify ways that knowledgeable nongovernmental stakeholders can assist with the Local Update of Census Addresses (LUCA) Operation — while preserving the strict confidentiality protections in Title 13, U.S.C. — to improve the accuracy of the address list that serves as the frame for the decennial census. If statutory provisions are a barrier to modifying or improving the LUCA process, the Census Bureau should work with the Department of Commerce and White House legislative office to propose legislation to modernize the program and ensure its continued value to the completeness of the MAF.
- b. Research the possibility of incorporating tribally-issued street addresses and 911 addresses, on American Indian reservations and in rural areas more broadly, in the Master Address File, to facilitate contact with these households via U.S. mail.
- c. Minimize, with the goal of eliminating, census design and operational elements that result in duplicate enumerations, leading to persistent overcounting of certain population groups, including non-Hispanic Whites, homeowners, and households with second or vacation homes. Explore a broader use of state and local administrative records (beyond the LUCA program) to help remove duplicate addresses from the MAF, throughout the decade and during peak census operations, and research and test new software to assist with the de-duplication effort in real time during peak operations.

5. ***Expand the use of administrative data to enumerate college students, including those who live in private off-campus housing and who fail to self-respond.*** Provisions of the Family Educational Rights and Privacy Act (FERPA) have proven to be a barrier to using administrative data to enumerate college students accurately and completely through the Group Quarters Operation and as part of Nonresponse Follow-up for students living in private, off-campus housing who don't self-respond. The Census Bureau, with support from the administration, should begin discussions with Congress promptly to facilitate the efficient use of institution-maintained administrative data to enumerate college students, by seeking a permanent, limited exception to FERPA, with appropriate confidentiality safeguards under Title 13, U.S.C., to ensure an accurate census count of this population.

In addition, the Bureau should research the use of high-quality administrative records on college students maintained by states, as an alternative or supplemental source of data to enumerate this population both in Group Quarters and in private, off-campus housing. The Bureau should determine early in the decade whether state laws prohibit the sharing of personally identifiable information and, if so, how to facilitate targeted exceptions, with appropriate confidentiality safeguards, that allow states to share limited information with the Census Bureau for purposes of the decennial census.

6. ***Research an appropriate use of administrative data to improve the count of American Indians living on reservations or trust lands.*** Given the sovereign nation status of American Indian tribes, the Bureau should begin now to develop a joint comprehensive census plan with each tribe for the 2030 Census. The Bureau must explore the possibility of negotiating agreements with each Tribal Nation for access to administrative databases created and maintained by their respective governments. The contracts will need to include strong protections to prevent any sharing of those data beyond the Census Bureau's use to implement the 2030 Census — a collaboration that will require a substantial period of time to complete. The Census Bureau must overcome substantial distrust of the federal government among American Indians and Alaska Natives, developed over centuries of broken treaties and other promises. In 2020, the Bureau faced significant challenges in conducting door-to-door activities on reservations closed due to the pandemic, both to deliver census materials in the Update/Leave Operation and to interview unresponsive households in the Nonresponse Follow-up Operation. However, the Bureau was able to negotiate access to phone lists with some, though not all, Navajo Nation communities that closed their borders to nonresidents during the pandemic. This arrangement could serve as a preliminary model for more extensive data sharing for the 2030 Census.

IV. How the Bureau contacts respondents

The Census Bureau is interested in tailored strategies to maximize the number of households that respond on their own. As noted above, we strongly support this goal, as self-response is the most secure, accurate, and cost-effective method of participating in the census. We offer several recommendations to increase the likelihood of self-response. However, because not all households will respond on their own, we also offer a recommendation to facilitate successful in-person interviews, which yield more accurate responses than proxy interviews or imputed data, in multi-unit buildings and gated communities.

1. ***Improve respondents' ability to respond to the 2030 Census without a unique ID tied to an address.*** Facilitating and accepting individual or household self-responses without a unique ID

assigned to a specific address, especially via internet and telephone, must be a priority for the 2030 Census. A sure way to boost self-response rates, especially online but also via telephone, is to make the process for a non-ID response simpler, clearer, and more user friendly. Improving this aspect of the process would boost the ability of mass services such as Google to promote census response to historically undercounted population groups. The Census Bureau should begin researching and testing online interfaces and instructions that make non-ID response as intuitive as possible. The communications campaign should elevate the ability to self-respond without a unique ID, as well.

- 2. *Test ways to mail all or a subset of self-response materials (including reminder postcards) to Post Office Boxes and non-city-style addresses, especially in areas that previously were included in the Update/Leave Operation.*** The Bureau has long identified, for alternative delivery of census materials, areas where homes do not have so-called city-style mailing addresses (e.g., 123 Main St., Anywhere, USA) or where households receive mail either at a Post Office Box or use addresses that make it more difficult to pinpoint the geographic location of a living quarter (e.g., where Rural Route 1, Anywhere, USA, is used for all homes along a stretch of road in a rural community). This alternative procedure for delivering census materials in Update/Leave areas reflected the Bureau's concern that it could not correctly geocode, for its Master Address File/TIGER system, living quarters that lack city-style addresses, without having a field representative visit the home in person to verify the location.
 - a. Set a primary goal of sending households that were in 2020 Census Update/Leave enumeration areas one or more 2030 Census mailings containing promotional, informational, and/or self-response materials, depending on the results of research and testing. Any new procedures should also apply to households that receive mail only at a P.O. Box, including in mail-out enumeration areas. The American Community Survey could serve as a cost-effective test-bed for these operational modifications.
 - b. Work closely with the U.S. Postal Service to facilitate respondent contact — for outreach, promotion, and enumeration — in communities with non-city-style addresses.
 - c. Explore open-source projects, such as Plus Codes (a Google project), that use latitude and longitude to assign shorter numbers and letters for a geographic location, thus facilitating delivery of mail and packages to residences without a traditional city-style address.
- 3. *Test methods to allow residents of Group Quarters to respond online, when appropriate and feasible.*** We are aware that the Census Bureau plans to update the procedures for enumerating some Group Quarters residents in the American Community Survey, starting in 2024. Modernizing the approach to enumerating selected Group Quarters would improve the cost-effectiveness and accuracy of this operation, and we urge the Census Bureau to test the application of new successful procedures used in the ACS to the 2030 Census.
- 4. *Research and test ways for non-related household members and multi-family households to respond on their own to the census more easily.*** A growing number of households do not meet the traditional definition of a single family (all related) living in a housing unit. Increasingly, non-family and extended-family members and even multiple families are living at one address, making it more difficult to ensure that all residents of the housing unit are counted, and counted correctly, in the census. The Bureau should develop and test promotional and educational

materials, and instructions for all response modes, that clearly explain (1) how to ensure that all individuals living as part of one household are included in the census response; and (2) how to respond individually or as a separate household if someone is not certain they were included in their household's response or if they want to establish the presence of a second family in a single housing unit. The Bureau also should be more transparent about its protocols for processing multiple responses from a single address, and should elevate the availability of non-ID responses for anyone who believes they were not counted in the primary response for their household.

5. *Improve guidance to building/property managers and landlords to facilitate entry into apartment and other multi-unit buildings during the Address Canvassing, Nonresponse Follow-up, and Post-Enumeration Survey Operations.*

- a. Consult early in the decade with associations representing multi-unit buildings, building and property managers and landlords, doormen, and tenants, to develop clear guidance and informational materials to ensure that enumerators can gain access easily and promptly to households that haven't self-responded. The Census Bureau should engage the U.S. Department of Housing and Urban Development, as well as state and local housing agencies, in the outreach effort to convey clear and timely guidance on legal requirements to facilitate entry to buildings and properties with more than one housing unit.

V. Respondent support services

The Census Bureau is seeking ideas for supporting people as they respond to the census, especially online and by telephone. Based on real-time reports and post-census feedback from grantees and partners, census funders identified a number of weaknesses in response modes that we believe require thorough evaluation, research, and testing to increase the likelihood of completed and accurate self-responses for individuals and households in 2030.

As a threshold matter, we urge the Bureau to modify its approach to language assistance and move away from a "one size fits all" framework. It might not be necessary to offer every type of informational or promotional resource in every language selected for the language program (e.g. questionnaire guides, fliers and fact sheets, radio or television or social media advertisements). The Census Bureau should work closely with philanthropy and partners, including Tribal Nations, to determine the array of assistance most needed for each language community. A targeted approach would ensure a more cost-effective program, thus allowing the Bureau to offer different levels of assistance in more languages, especially those languages that were overlooked in 2020 because they did not meet "language spoken at home" thresholds at the national level — an issue we address more fully in our first recommendation for improved respondent support services, below.

1. *Expand response support activities for households that speak a non-English language at home or are considered limited English proficient, including targeting response materials in a greater number of languages to localities with high concentrations of language minorities.*

The process for determining languages for translated materials in 2020 was problematic. Identifying languages for paper forms, Internet Self-Response, and Census Questionnaire Assistance based only on national population metrics ignores the geographic concentration, often at the state or local level, of many language minorities. Even state-level metrics for determining languages for assistance guides, glossaries, and other tools to facilitate

enumeration fail to account for widespread concentration of language minority populations at the local level. It is in everyone's interest to eliminate language barriers to self-response, given the importance of an accurate census and the potential for significant cost-savings when self-response rates are higher. Therefore, we recommend the following research and census preparation activities to achieve this goal.

- a. Start research early on identifying language assistance needs at substate geographic levels (such as counties and large cities), to determine if paper forms and telephone assistance should be offered in additional languages on a targeted basis.
- b. Start research early to identify concentrations of language minorities at the local level, in order to offer an appropriate range of support materials to respondents — such as glossaries and assistance guides — in more languages on a targeted basis. Consult with stakeholder organizations serving limited English proficiency households (including immigrants and refugees) to determine the most effective tools for reaching these populations.
- c. Plan for sufficient bilingual Partnership Program staff, starting at least three years before the census and continuing through peak operations, to interact with people whose primary language is not English at every step of the census process and improve their understanding of why it is important to participate in the census and how they can do so securely, easily, and accurately.

2. *Evaluate and improve Census Questionnaire Assistance (CQA), with a focus on in-language assistance and facilitating real-time responses by phone for all callers who want to use that response option.*

The Census Bureau should make the option of providing responses by telephone as easy as possible, with a goal of capturing responses from anyone who calls seeking assistance. The Bureau *should not adopt* private sector tactics designed to drive customers who call toll-free lines for assistance to pursue a resolution online instead. Some people are more comfortable interacting with a live representative over the phone than with navigating a digital questionnaire on a computer or smartphone; others do not have suitable broadband access, or face language and/or literacy barriers and would benefit from personal, in-language guidance to provide their responses. There are a number of reasons why the telephone response option was not used as widely as the Bureau had projected in 2020 (see *Looking to Census 2030*, pg. 9, for examples). The Bureau should not minimize the importance of this option in 2030, as it did in 2020.

The Bureau should take the following steps to facilitate use of this response mode for anyone who prefers to provide their information by telephone.

- a. Thoroughly evaluate the 2020 CQA Operation to determine which groups (by demographic characteristics, language, and geographic area) responded or sought assistance via CQA, and to identify system weaknesses — including failure to promote this response option widely, and unacceptable wait times — that may have prevented more households from responding by phone.

- b. Research and develop a way for partner organizations that offer their own telephone hotlines to answer questions about the census, to patch callers through to the 2030 CQA lines directly, thereby translating interest and willingness to respond to the census into a completed interview in real time.

3. *Expand and strengthen mobile and fixed-location questionnaire assistance.* The original 2020 Census design did not include questionnaire assistance sites similar to Questionnaire Assistance Centers (QAC) in 2010. QACs were located at fixed sites (such as libraries and community centers) in communities with historically low self-response rates. Individuals could request help in filling out their paper census forms, or use a “Be Counted” form without a unique geocode tied to the individual’s (or household’s) home address. While the concept was worthwhile, community-based stakeholder organizations often were frustrated by a lack of consultation and timely information about the location and hours of operation for QACs. In addition, the QACs closed after the self-response period ended, as the Census Bureau believed it was best to focus field resources on the Nonresponse Follow-up Operation.

The Bureau did not include QACs in its design for the 2020 Census. Congress stepped in with legislation late in the decade, however, directing the Census Bureau to offer some type of community-based questionnaire assistance. In response, the Bureau developed a Mobile Questionnaire Assistance (MQA) Operation, after consulting with stakeholders organized by the American Library Association. The plan called for teams of trained, sworn census field staff, equipped with tablets, to visit heavily trafficked locations (such as government buildings and libraries) and widely-attended public events (such as faith services and basketball games), and help people who hadn’t self-responded fill out a census form online on the spot, with or without the unique ID sent to the individual’s or family’s home address.

Unfortunately, the pandemic derailed MQA plans for the first few months of peak census operations, as local governments, libraries, and schools closed their doors to the public, and large public gatherings — such as festivals and sporting events — were canceled. The Bureau resumed a modified MQA Operation after lockdowns started to lift, based on local health conditions. But stakeholders again were frustrated by the Census Bureau’s lack of robust coordination with local governments and community groups about locations and hours for MQA, making it difficult to promote this support for respondents in historically undercounted communities effectively. Therefore, we offer the following recommendations for the 2030 Census, which should be tested as part of the census “dress rehearsal” in all sites in 2028.

- a. In close consultation with key national and community-based partner organizations, expand and strengthen programs placing Census Bureau staff at community and government centers and public events, to facilitate and assist with real-time self-response using tablets or other secure devices. The Bureau should offer both fixed location and mobile community-based questionnaire assistance, in consultation and coordination with local governments and civic leaders who can then promote these locations and opportunities through local networks and media.
- b. Increase transparency about the criteria and process for deciding where to offer mobile and fixed-location questionnaire assistance. Partnership specialists should work closely with community-based partner organizations and local governments to identify high-traffic

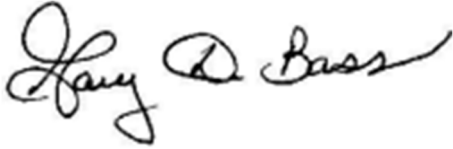
events and locations that are accessible by public transportation, and advertise them well in advance.

- c. Improve communication with the public about the location of fixed and mobile questionnaire assistance during census operations. In 2020, many community-based stakeholders said it was difficult to obtain information on the where and when MQA would be offered. The Census Bureau should explore ways to make this information easily accessible online and through partnership specialists and local government partners (such as Complete Count Committees).

- 4. *Research ways to remove barriers to full participation in the census for people with disabilities.*** The Bureau should consult with people with disabilities and other experts working with or representing people with disabilities, to develop a research agenda aimed at improving the enumeration of this often-overlooked population and investigate possible barriers to participation that might affect the accuracy of the count. It should also research appropriate outreach measures and messaging to ensure that persons with disabilities and their caregivers understand the importance of the census and the various accommodations available to facilitate their response.
- 5. *Provide clearer instructions for individuals in “non-traditional” categories to determine if they should be counted in the census and, if so, to facilitate correct responses, to help improve accuracy by reducing undercounts and overcounts, both of which contribute to an inequitable census outcome.*** Based on feedback from our grantees and partners during the 2020 Census, it appears that people with second or vacation homes, foreign nationals working, studying, or teaching in the U.S., and parents of college students were among those who were confused about whether and where they should be counted in the census and who to include in their household. The Bureau should conduct qualitative research and test revised instructions to improve the clarity of response instructions. It also should address these and similar confusing situations in promotional materials, FAQ brochures, and in targeted advertising in geographic areas where people and households might need better instructions, such as in seasonal vacation communities and college towns.
- 6. *Consult with state and local governments (through their associations) about ways to facilitate easy access to the official 2030 Census internet response portal through their own websites.*** The Bureau should work with states and localities to offer links to information about census promotion events, local census offices, and questionnaire assistance sites, relevant to each geographic area. The Bureau also should post contact information for partnership specialists, by state and substate regions. In 2020, it often was difficult for partner organizations and census funders to reach local or regional Census Bureau staff who could help set up events and briefings, provide information on MQA sites, answer questions about the status of job applications, and provide promotional materials for partner organizations to use in their Get Out the Count campaigns.

In closing, we appreciate the opportunity to offer recommendations for a robust research agenda and improved census operations, to help achieve our mutual goal of achieving a more equitable census in 2030. We thank you for your consideration of our views on this important topic.

Sincerely,



Gary D. Bass
Consultant & Executive Director Emeritus, Bauman Foundation
Chair, Census Equity Initiative



LaShanda A. Jackson, MBA
Executive Director, Funders' Committee for Civic Participation (FCCP)



Sol Marie Alfonso-Jones
Senior Program Officer, Long Island Community Foundation
Chair, Funders Census Initiative, FCCP



David Martinez III
Director of Community Engagement, Vitalyst Health Foundation
Vice Chair, Funders Census Initiative, FCCP