



November 15, 2022

Fair Count, Inc.
P.O. Box 170382
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RE: FAIR COUNT (A MEMBER OF THE 2020 BLACK CENSUS ROUNDTABLE) RESPONSE TO U.S. CENSUS BUREAU'S REQUEST FOR PUBLIC COMMENTS: FEDERAL REGISTER NOTICE ON 2030 CENSUS RESEARCH PRIORITIES

Dear U.S. Census Bureau:

Fair Count, a member of the 2020 Census Black Roundtable, is pleased to respond to the Census Bureau's request for recommendations on designing its 2030 Census research agenda, as indicated in an August 17, 2022 *Federal Register Notice*. The Decennial Census is the foundation of Democracy for the people of the United States and our community. It allows for political representation in the halls of Congress and equitable distribution of federal funds to states and local governments. Unfortunately, since the establishment of the Decennial Census in 1790, and the mandate of counting every person residing in the U.S., the Black population has either been undercounted or not counted as a person deserving of full rights and protection.

Founded in 2019 to ensure a fair and accurate count in the 2020 Census, Fair Count is a nonprofit, nonpartisan organization that works to build long-term power in communities that have been historically undercounted in the decennial census, underrepresented at the polls, and whose communities are often torn apart in redistricting. Fair Count sees this feedback opportunity as a way to find ways to work in tandem with the Bureau for the collective goal of accurately counting everyone in the U.S. mainland and territories.

Our feedback for the 2030 Census Design is guided by these four principles.

1. All research designed to improve the 2030 Census must have at its forefront the goal of conducting the Census and associated research through a racial equity lens, from personnel and decennial planning team makeup, to research, testing, budget development, final design, and operations.
2. The U.S. Census Bureau should create a Black Census "Hub" within Decennial Census operations to ensure that the unique and diverse needs and experiences of Black communities are adequately addressed and embedded in the Bureau's recruitment and hiring, research, funding and operations, and, most importantly, the culture of the Census Bureau.



3. The Census must *protect and insulate* resources for the 2030 Census research throughout the 2030 Census budget life cycle, including testing designed to eliminate the differential undercount of historically undercounted populations.
4. Great caution must be taken in using Administrative Data without weighing and assessing the quality of all Administrative Records (AdRecs) the Census Bureau plans to use in the 2030 Census.

With respect to the five key areas the Census Bureau sought feedback on, we stand with the National Urban League in recommending the following:

Reaching and Motivating Everyone

- Use Mixed-Methods to Understand Root Causes of the Black Undercount (and the White Overcount). An embedded mixed-methods approach that leverages the best of qualitative (e.g., ethnographic, focus groups) and quantitative (e.g., extant data) approaches would help to unearth the reason for the differential count with attention to the undercount and overcount. It is critical that multiple methods are used to ensure that the data being collected or curated is accurate, whether directly from individuals, households, and proxies or with administrative data, and, more importantly, to uncover *the root* of the differential undercount for Black communities. As the Black population becomes more diverse by ethnicity, language, socioeconomic status, immigration status, and so much more, the Census Bureau must also ensure that the questions being asked have been meaningfully tested and examined and that the data collection, processing, and outputs are clear and meaningful. We and our partners are unaware of any comprehensive research taken by the Census Bureau to understand the root causes of the persistent undercount of the Black population (including Black men, young children, and Black immigrants).
- Research Strategies to Prioritize Low Response Areas in Census Operations. To reduce the undercount of the Black population, prioritize 2020 Census low response communities by conducting an *early* NRFU launch, as was done in the 2020 Census for western U.S. states experiencing wildfires. Waiting until the last few weeks of the Census to conduct NRFU and close out the data collection period only exacerbates the harm for Black communities. The Census Bureau must research the most optimum time to enumerate low-response households and communities via NRFU, possibly moving up the schedule by several weeks to avoid hurricanes and other unanticipated obstacles.
- Conduct a 2030 Census End-to-End Test/Dress Rehearsal in a Majority Black Community. The test/dress rehearsal is a critical Census operation that helps to pinpoint operational successes and improvements, but also where challenges and, more precisely, where inequities may get baked in during the data collection period, a very stressful period for all Census Bureau staff. To minimize inequities in the actual

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collection, we strongly recommend a test/dress rehearsal focused in a majority Black city or county that was undercounted in the 2020 Census (and potentially other Census).

- Conduct a Pilot Study Focused on Accurate Data for Incarcerated Populations. In their September 2022 report, *Improving the Census*,¹ the Brennan Center for Justice at New York University School of Law, noted the need to end prison gerrymandering by allowing incarcerated people to be counted at their previous home address. Black people make up 38% of the incarcerated population, but only 13% of the general United States population.² Considering the disproportionate rate of Black people that are likely to be incarcerated in their lifetime compared to White people and other people of color, it is especially critical to assess how data can be gathered fairly and accurately for this vulnerable population. The Census Bureau can partner with states that have already agreed to re-allocate Census data from incarcerated individuals back to their home addresses which entails mailing census forms directly to the incarcerated individuals for self-response. The goal would be to obtain more quality, accurate data on incarcerated individuals than incomplete, inaccurate data submitted to Census via administrative prison rosters.

Technology

- Explore and Evaluate the Use of Technology to Precisely and Efficiently Collect Data from Historically Undercounted Black Communities. Technology should be used to support the equitable distribution of resources and support and to ensure a fair and accurate count, but it should not supplant human contact where possible. Given the inherent biases in technology algorithms, as well as inequities in the access and use of technology, a comprehensive evaluation should be done when introducing new technology in this space. Technology, such as drones, can be used to increase the efficiency of enumerators visiting hard-to-reach communities and households. For example, drones can map out the terrains and potential barriers to data collection, reroute enumerators, or distribute resources and supports in a timely fashion. For example, hurricane season and wildfires were known to impact the Census 2020 data collection.³ The Census Bureau should examine the use of cutting-edge technology, e.g., drones, and on-the-ground real-time data, to mitigate against barriers to data

¹ Thomas Wolf et al., *Improving the Census*, Brennan Ctr. for Just. (September 13, 2022), <https://www.brennancenter.org/our-work/policy-solutions/improving-census>.

² Wendy Sawyer & Peter Wagner, *Mass Incarceration: The Whole Pie 2022*, Prison Pol’y Initiative (March 14, 2022), <https://www.prisonpolicy.org/reports/pie2022.html#slideshows/slideshow6/2>.

³ *Impacts of Hurricanes on Data Collection and Estimate Quality for Puerto Rico, Texas, and Florida, U.S. Census Bureau* (September 2018), <https://www.census.gov/programs-surveys/acs/technical-documentation/user-notes/2018-02.html>.



collection efforts in a timely fashion, such as timely routing/rerouting of mobile data collection buses to spots to be where people may congregate.

New Data Sources

- Conduct a Data Linkage Research Study Focused on the Undercount with the ACS. The differential net undercount is a continuing problem in the Decennial Census. The ability to identify strategies that could reduce the differential net undercount has suffered from a lack of granular data for analysis. The Post-Enumeration Survey provides race and ethnicity detail at the national level and total state estimates, but not substate estimates (i.e., city, county). Administrative records vary in their completeness of population coverage and race and ethnicity detail.

One potential approach to address this issue is to initiate a *Data Linkage Research Study Focused on the Undercount* that would link (or match) the American Community Survey (ACS) individual records for 2019, 2020, and 2021 to the 2020 Census and to as many kinds of administrative records as possible (not just those used nationwide in the 2020 Census). The goal would be to try to tease out patterns and characteristics that suggest strategies that could improve the census count for some groups in some areas.

Contacting the Public

- Study the Effect of Continuing the Paid Advertising Campaign throughout Nonresponse Follow-up in 2020 Census Low Response Areas. Rather than ending paid advertising and outreach at the beginning of NRFU as was done in 2020 and previous Censuses, paid advertisement should continue until the end of the data collection period in low response areas and target certain populations, such as Black males, to encourage 2030 Census participation. Optimally, this could minimize the size of the NRFU universe, allowing for more accurate self-response from these households. Non-ID Census forms could be heavily promoted during late marketing and outreach.
- Conduct a Regional Assessment of the 2020 Census Self-response in Each of the Six Census Regions. It is critical to examine if the Black undercount was evenly distributed proportionately across all regions or if there are clear and distinct regional differences in the count. This would allow the Census Bureau and community partners to understand potential factors contributing to the Black undercount and how they can be ameliorated before and during the Census data collection, such as a more nuanced 2030 Census outreach and media strategy based on this regional-based evaluation.

- Evaluate the Efficiency of Communication Drivers and the Equitable Distribution of Communication Funds to Black Contractors. Robust communication resources, especially for historically undercounted communities, are necessary to ensure a fair and accurate count. However, it entails that resources are equitably distributed to community-rooted organizations to ensure that communication drivers, including communication norms, styles, and approaches, are culturally grounded to effectively reach Black communities. For example, the [Government Alliance for Race and Equity \(GARE\)](#)⁴ emphasized the importance of communication being explicit about racism, being data and story-driven, and embracing a learning culture that dismantles pervasive racial inequity. For example, a systematic analysis done to understand COVID-19 vaccine hesitancy in Black communities found three issues: (a) addressing mistrust, (b) combating misinformation, and (c) improving access to COVID-19 vaccines.⁵ A similar approach can be taken by the Census Bureau to understand what strategies are most efficient to reach and gather accurate data from the Black community and households, and under what conditions. This means both selecting communications experts and organizations rooted in the Black community and synthesizing approaches that work best for the diverse members of the Black community. This intentional approach is needed to uproot racial inequities inherent in the Census and redress them by providing information that connects with diverse Black communities.

Supporting the Public

- Research the Race and Ethnic Composition of the 2020 Census Internet Response Option and Accelerate Self-report in Black Communities. The 2020 Internet Response option saved the Census in the midst of the pandemic when operations requiring face-to-face contact (i.e., NRFU and Update Leave) were substantially delayed, and widespread COVID-19 Census staffing shortages occurred nationwide. Indeed, the Internet Response option, helped the Census Bureau exceed its 2020 Census self-response goal; the Census Bureau received responses from 63.4 percent of households (approximately 93.6 million housing units)—exceeding its goal of 60.5 percent, and stopping the historical decline in decennial self-response rates,⁶ though we don't know whether it stopped the decline in Black community's self-response due to the lack of granular data. Because the Census Bureau has not provided granular data on the count, it would be useful to know the race and ethnic breakdown of the 2020 Census Internet response option. Did the Black population comprise a significant component of the

⁴ Gare Communications Guide, Racial Equity All. (May 2018), <https://www.racialequityalliance.org/wp-content/uploads/2018/05/1-052018-GARE-Comms-Guide-v1-1.pdf>.

⁵ Debbie Dada et al., Strategies That Promote Equity in COVID-19 Vaccine Uptake for Black Communities: A Review, 99 J. of Urb. Health 15-27 (2022), <https://doi.org/10.1007/s11524-021-00594-3>.

⁶ Gov't Accountability Off., 2020 Census, GAO-21-478 (June 2021), <https://www.gao.gov/assets/gao-21-478.pdf>

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Internet Response? Was there an undercount of the Black population within the Internet Response option? If so, the Census Bureau can design additional response options or improve existing ones, to reduce the Black undercount—to include paper, phone, house visits, and/or Administrative Data Records. Additional education and outreach will also be needed to increase Internet Response for the Black population.

- Conduct Research to Improve Recruitment, Hiring, Onboarding, and Retention of Diverse Field Staff. Timely recruitment and hiring efforts suffered during the 2020 Census due to tremendous backlogs at the Census Bureau, which stifled efficient onboarding of field staff. A “centralized” hiring process was utilized during the 2020 Census, which required applicants to be vetted through the Department of Commerce’s hiring system, and not through the Census Bureau. If the Census Bureau has not thoroughly evaluated the cause of the backlogs and how they can be improved in 2030, the National Urban League recommends that such research be prioritized and conducted. Furthermore, it is important there is a concentrated focus on recruiting diverse field staff, especially for the Black community, considering the growing diversity of this population. This will require creating *benchmarks* for hiring, onboarding, and retaining field staff that is representative of and knowledgeable about the Black community.
- Evaluate the Distribution of Resources, such as the Placement of Field Offices, and Right-Size to Ensure Equitable Access to Resources. Equitable distribution of resources, including financial resources and human capital, is needed to effectively reach the diverse Black community. Many resources are needed to fairly and accurately count Americans every 10 years, starting at least 10-12 years before the actual count, and resources are limited. However, funding equity is perhaps the most fundamental and critical dimension of building equitable systems and addressing the differential count. Adequately reaching the Black population requires providing robust resources continuously, timely, and to community-rooted organizations. For example, considering the differential count that often has a net undercount of Black communities, it is critical that resources to Black communities are allocated early and in a way to meet the demands of counting the diverse community. Data indicates that over 60% of Black people live in the Southeast, and the Post-Enumeration Survey found that most of the undercount occurred in the Southeast. While we cannot extrapolate whether the undercount of Black communities contributed to this regional net undercount, the Census Bureau must allocate funds to regional and area census offices based on prior low response rates, while accounting for the regional geography. Regional offices must be adequately placed and resourced to support the community by providing equitable sources that account for the total population, population response rate (i.e., low-response rate communities), *and* geography (i.e., attend to the dispersed geography of rural communities in the Southeast). That is, if we know that the majority of undercounting is happening in Southeast states where there are majority Black

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populations who have been historically undercounted (or miscounted), then this should be corrected through resource adjustment.

I hope these areas outlined can be prioritized in the Census Bureau's 2030 Census Design. I believe that attention to these issues would not only strengthen the work of the Census Bureau but, most importantly, meet the larger goal of our civic obligation for a fair and accurate count of everyone in the U.S.

Thank you for your service to the nation and commitment to an accurate Census. Fair Count, a member of the 2020 Census Black Roundtable, stands ready to assist the Census Bureau throughout the decade to ensure an accurate count of the Black population and the whole Nation.

Sincerely,



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President
Fair Count