



March 22, 2019

Submitted to: [OIRA Submission@omb.eop.gov](mailto:OIRA_Submission@omb.eop.gov)

Sheleen Dumas, Departmental Lead PRA Officer
Office of the Chief Information Officer
Commerce Department
14th and Constitution Avenue NW
Washington, DC 20230

Re: American Community Survey Methods Panel Test, 2019 Census Test (84 FR 5986)

Dear Ms. Dumas,

On behalf of the Southeast Asia Resource Action Center (SEARAC), we write to offer comments on the 2020 Census Federal Register Notice on the American Community Survey Methods Panel Tests. We are concerned that:

1. Conducting a test that incorporates a citizenship question regardless of the Supreme Court's final decision on the matter will cause much fear and confusion among vulnerable and hard to reach immigrant and refugee communities.
2. The lack of language support for limited English proficient communities is inadequate to mitigating the potential impact of a citizenship question, and
3. The lack of disaggregated data analysis among Asian sub-groups would mask the unique impacts of a citizenship question to the participation of Southeast Asian Americans (SEAAAs).

As an organization working to empower Southeast Asian refugees from Laos, Cambodia, and Vietnam, SEARAC believes that a full, fair, and accurate census, and the collection of useful, objective data about our nation's communities, is vitally important. We have previously shared that state and local officials and community leaders had been deeply concerned about the difficulty of achieving robust participation in many communities, long before Secretary Ross' decision to place a citizenship question on the 2020 Census. Now, with the legal challenges facing the addition of this untested question and much uncertainty on its potential addition to the 2020 questionnaire, we are concerned about confusion that this 2019 census test (as currently designed) would likely cause in our communities.

In the current political environment, immigrants feel demonized, and their worst fears are realized when federal agents invade homes, schools, and places of worship, and families are torn apart both at the U.S. border and in the heart of communities. In 2017,

SEAs were devastated by the biggest mass deportation roundup of Vietnamese and Cambodian immigrants in history.¹ Deportation increased even further in 2018.² As a result, SEA immigrants and their families carry legitimate fears of being targeted and separated from their loved ones. Because of this, SEARAC remains opposed to the addition of a citizenship question to the 2020 census, as it would severely impact our SEA families, in addition to many others who are already at greater risk of being undercounted.

Need for Flexibility (including abandoning testing plans)

Currently, there is uncertainty about whether there will be a citizenship question on the 2020 decennial census form as litigation works its way through the court system. To that end, we believe that the Census Bureau must structure the 2019 Census Test in a way that minimizes potential confusion in the public if the Supreme Court decides to disallow the addition of a citizenship question on the 2020 decennial census form. With a decision likely to be handed down in June of 2019 from the Supreme Court, the Census Bureau should postpone the 2019 Census Test by a month (with an August 1, 2019 Census Day rather than a July 1, 2019 Census Day). Because mailings will begin in mid-June for a July 1, 2019 Census Day, there could be conflicting materials in the field once the decision is announced. At a minimum, the Census Bureau should be prepared to cancel its 2019 Census Test, even if it is done with a July 1, 2019 Census Day, the moment the decision is announced. Without these contingency plans in place, the 2019 Census Test could be extremely confusing to the public and would exacerbate existing belief that the Census Bureau is moving forward with the question regardless of the Supreme Court decision.

Need for detailed data analysis

The 2019 Census Test will employ a sample size of 480,000 addresses. The response categories for race will be collapsed into the following categories: White alone, Black or African American alone, American Indian or Alaska Native alone, Asian alone, Native Hawaiian or Other Pacific Islander alone, Some Other Race alone, Two or more races. Due to sample size, additional racial subgroups, including Asian subgroups, will not be analyzed.³

As the largest refugee community to ever resettle in the United States, SEAs total nearly 3 million across the nation.⁴ Yet socioeconomic, educational, health, and immigration challenges, stemming from SEAs' refugee experiences, are often overlooked. Due to our community's unique challenges of marginalization, granular analysis through disaggregated data is vitally important to ensuring that we are not

¹ "Southeast Asian American Community Responds to the ICE Roundup of Cambodian & Vietnamese Americans," <http://nac.org/nacvoices/presrann/jpss-cambodia-and-vietnam/>

² Communications w CB? Do we highlight this or not – will this make it less likely for them to give us info in the future as NAC members

⁴ American Community Survey (ACS) - U.S. Census Bureau, 2013 3-year estimates

absorbed and represented by a broader “Asian American” category. Because of this, we believe that this relatively large sample size should allow for data analysis and breakout by some Asian subgroups (similar to what is planned for Hispanic subgroups), including Cambodian, Vietnamese, Lao, Hmong, and Iu-Mien.

It is important that the Census Bureau understands the potential impact of a citizenship question on our communities. 13.3% of Cambodians, 8% of Hmong, 12.8% of Lao, and 16.3% of Vietnamese immigrants eligible for naturalization are still not citizens. Further, one out of ten SEAs overall are more recent immigrants who had not come into the country until 2010 or later.⁵ Because of this, we believe that the impact of a citizenship question on the 2020 census would uniquely harm SEAA participation in ways that would not be uplifted without disaggregated data analysis for Asian subgroups.

Need for More Language Support for 2019 Census Test

While we recognize the 2019 Census Test provides some language support, we believe it is insufficient to properly assess the impact of the citizenship question on SEAA communities. The lack of an internet survey response option in any Asian language is glaring. Offering only telephonic language support for Asian languages is insufficient. Research shows that Asian American, Native Hawaiian, and Pacific Islanders (AANHPIs) overall are most likely to complete the survey either online or on paper, with only 16% interested in utilizing the toll-free number to complete their form in-language.⁶ This is consistent across the groups that will receive a minimum level of language support during the 2019 Census. According to the 2017 American Community Survey (ACS), 35.4% of Cambodians, 32.1% of Hmong, 32.9% of Lao, and 45.1% of Vietnamese immigrants speak English less than “very well”⁷. Because of these challenges, the 2019 Census Test should provide more language support for other non-English languages beyond the telephone questionnaire assistance.

Conclusion

We reiterate that the 2020 decennial census form should not include a citizenship question. However, to the extent that the Census Bureau plans to test the operational effect of including a citizenship question on the census questionnaire in order to assist with planning for the NRFU operation in 2020 and inform the Integrated Partnership and Communications Campaign, we believe that a) there must be a plan to either postpone the test by one month and/or pull the test all together if the U.S. Supreme Court uphold the injunctions against the inclusion of the citizenship question, b) provide more language support beyond the TQA for the covered Asian languages, and c) provide Asian sub-group breakouts in the event the test is fielded. Ultimately, regardless of the outcome of the test, the 2020 Census efforts must be focused on counting those hardest to count. To that end, the Census Bureau should heed previous recommendations, such as ensuring proper recruitment and hiring for NRFU

⁵ U.S Census Bureau, 2016 American Community Survey, 1-Year Estimates.

⁶ Asian Americans Advancing Justice-AAJC, Census Messaging Research

⁷ American Community Survey (ACS) - U.S. Census Bureau, 2017 1-year estimates

operations, and robust and early investment in the partnership and communications campaign.

Thank you for this opportunity to comment on the planned 2019 Census Test. We hope our comments will help the Census Bureau as it strives to accurately count communities across the country. If you have any questions, please feel free to contact Katrina Dizon Mariategue, Director of National Policy at katrina@searac.org or (202) 601-2968.

Sincerely,

A handwritten signature in blue ink that reads "Quyen Dinh". The signature is fluid and cursive, with "Quyen" on the top line and "Dinh" on the bottom line.

Quyen Dinh
Executive Director
SEARAC