



May 12, 2020

The Honorable Ron Johnson
Chairman, Senate Homeland Security and
Governmental Affairs Committee
United States Senate
Washington, DC 20510

The Honorable Carolyn Maloney
Chairwoman, House Committee on Oversight
and Reform
United States House of Representatives
Washington, DC 20515

The Honorable Gary Peters
Ranking Member, Senate Homeland Security
and Governmental Affairs Committee
United States Senate
Washington, DC 20510

The Honorable Jim Jordan
Ranking Member, House Committee on
Oversight and Reform
United States House of Representatives
Washington, DC 20515

Dear Chairman Johnson, Ranking Member Peters, Chairwoman Maloney, and Ranking Member Jordan:

On behalf of the Census Counts campaign, a collaboration of stakeholder organizations working to ensure that historically undercounted communities are counted in the 2020 Census, we thank you for your support for a fair and accurate census. The timing, pace, and scope of the current public health crisis have disrupted the implementation of the 2020 Census beyond any challenges we could have imagined, with consequences for the quality, accuracy, and fairness of the count that could be far-reaching and long term. Accordingly, we want to highlight further modifications we believe the Census Bureau can and should make to the 2020 Census plan in light of the significant timeline delays and adjustments to operations the bureau has already made.

The Census Bureau has extended the enumeration period through October 31, 2020. The Census Counts campaign acknowledges that the Census Bureau's updated timeline reflects necessary efforts to safeguard the health of the public and census workers alike, and to provide a viable option for a full and effective Nonresponse Follow-up (NRFU) operation that is essential to reach vulnerable communities.

However, we are particularly concerned about the disruption to census operations specifically designed to enumerate historically undercounted communities. These activities include special operations to hand-deliver census packets in rural and remote communities, on American Indian reservations, in areas recovering from natural disasters, in Alaska, and in Puerto Rico; to enumerate people experiencing homelessness; and to facilitate internet access in low self-response neighborhoods (including the congressionally mandated Mobile Questionnaire Assistance operation). Most importantly, the bureau will delay and extend the largest, costliest, and most labor-intensive operation — NRFU, the door-to-door enumeration — which disproportionately covers historically undercounted population groups and communities that exist in every corner of the country.

Therefore, on behalf of the Census Counts campaign and the 143 undersigned organizations, we urge you — as leaders of the committees with responsibility for overseeing the work of the Census Bureau — to

closely examine the Census Bureau's adjusted operational timeline and advocate for enhancements to address the severe disruption the COVID-19 crisis has caused for successful completion of the 2020 Census. These enhancements should include:

- **Send at least two additional census mailings during the extended self-response period from May through early August.** With the start of the NRFU delayed until August 11 and many households confused about the census timeline, the Census Bureau should send a series of additional census mailings to households that have not responded to the 2020 Census. The mailings should include at least one or more of the following materials:
 - A paper questionnaire;
 - A reminder to households that they can still respond on their own through October 31, 2020, and provide specific information and examples of how to identify enumerators in the field (noting that enumerators will be wearing personal protective equipment, such as facemasks); and
 - All mailings should remind households that "It's not too late! The census is still going on!" and include in-language messaging that lets people know they can respond in that language online or by telephone (with the appropriate toll-free numbers provided).
- **Update the 2020 Census Integrated Communications Campaign.** The Census Bureau should make the following adjustments to the Integrated Communications Campaign:
 - The advertising program should run through a significant portion of the NRFU period, targeted to communities with large caseloads and as completion rates warrant.
 - Add new languages to the advertising program — including Haitian Creole and African, Asian, Native Hawaiian and Pacific Islander, and Native American languages — in the medium that best reaches each community, to increase the effectiveness of the campaign. This could be accomplished by expanding the scope of work for existing Census Bureau contractors with appropriate language skills or compensating Census Bureau partners with cultural competence and language skills to provide additional translations.
 - Stakeholders are pleased to see the Census Bureau's adjusted campaign creative that acknowledges how census data benefit a post-COVID-19 world. However, we are dismayed that advertising targeting communities disproportionately affected by the pandemic — including African American, Latino, Native Hawaiian and Pacific Islander, and Native American communities — have not been similarly adjusted. The Census Bureau should continue to incorporate updated campaign creative in all languages in which it has created outreach materials, as well as for historically undercounted or low self-response communities that also are facing disproportionate health and economic challenges from the pandemic.
 - Deploy an advertising campaign and strategy focused on American Indians and Alaska Native communities and villages by leveraging the media vehicles present in Update Enumerate and Update Leave areas, including tribal radio and billboards. Expand the tribal languages covered in the advertising campaign and deploy strategies to reach

households, especially in the absence of timely delivery of initial census packages; partner with tribal governments and tribal Complete Count Committees as much as possible for assistance.

- Modify the advertising program to target communities that have not yet responded to the census and adjust the creative appropriately. Enhance communications to groups included in “diverse mass” that need, but are not likely to receive, specific outreach, including: English-speaking Latinos, people with disabilities, parents of young children, LGBTQ people, people experiencing homelessness and housing instability, and people living in poverty.
 - The bureau should incorporate messaging about confidentiality into its earned and paid media strategy, e.g., that the Census Bureau will not share data with landlords, law enforcement, or public benefit providers.
 - Increase in-language ads (with relevant toll-free numbers) for the Census Questionnaire Assistance (CQA) operation.
 - In preparation for NRFU, the Census Bureau should work with local officials and Complete Count Committees to prepare communities for the arrival of census enumerators, given the new NRFU timeline, PPE clad enumerators with masks, and other significant changes to this operation. Census advertising should reflect enumerators in PPE to encourage the public to open their doors during nonresponse follow-up, and to ensure respondents can readily identify official Census Bureau employees.
- **Expand staffing of the Census Questionnaire Assistance operation for all languages.** Households have reported long wait times on the CQA lines. The Census Bureau should continue to add capacity to the phone lines and ensure that the phone call-back option is operational and effective for all languages.
 - **Update guidance for stakeholders supporting the 2020 Census.** Many organizations are reaching households using phone banking, peer-to-peer texting, and responding to questions on census hotlines under Telephone Consumer Protection Act (TCPA) guidelines. In the absence of in-person outreach, the Census Bureau should encourage organizations to utilize phone outreach to reach communities that have not responded to the 2020 Census.
 - **The Mobile Questionnaire Assistance (MQA) operation should be reimagined in response to COVID-19, with an expanded framework that includes both "mobile" assistance and fixed locations, as well as a larger staff.**
 - A revised approach can still be effective in bringing on-line response access and general questionnaire assistance to hard-to-count communities and reducing disparities in response rates. The Census Bureau should deploy Census Response Representatives, in accordance with local conditions and following health precautions, to locations in low self-response census tracts that remain open or have reopened, as well as to new locations

that residents visit as they navigate difficult economic conditions, such as food distribution centers and agencies responsible for distributing benefits under the CARES Act and other relevant programs.

- The bureau should promote in advance the availability of assistance from sworn census employees at specific locations and times.
 - Partnership Specialists should continue to consult with local and national partners (including local officials) to identify appropriate locations for mobile and fixed location questionnaire assistance.
 - Until the bureau can implement a revised Questionnaire Assistance operation, continue to redeploy Census Response Representatives to support phone questionnaire assistance and other key operations.
- **Schedule operations for counting people experiencing homelessness.**
 - In consultation with stakeholders (service providers, organizations representing people experiencing homelessness, and cities), reschedule Service-based Enumeration and TNSOL as soon as possible.
 - The Census Bureau should consider the use of administrative data (for example, HMIS/RHYMIS, equivalent state/local administrative records, and/or Point In Time counts) to supplement the rescheduled operations.
 - **Provide data to stakeholders to support outreach campaigns.** The Census Bureau should increase the transparency of its operations and provide the following data to stakeholders to support effective outreach strategies and maintain momentum for “get out the count” efforts.
 - Data on self-response should be released every weekday and NRFU completion rates released once a week through the full household enumeration period. Separate self-response data on the mode households use to respond — phone, paper, or online — would help ensure that stakeholders are able to adapt messages and outreach to specific communities effectively.
 - Data on staff recruitment, hiring, and on-boarding (including applicant pool, applicants that have left the applicant pool, offers made, staff fingerprinted, staff trained) that help stakeholders support Census Bureau recruitment efforts. With the additional time that the Census Bureau has to recruit and hire staff with cultural competency and language skills for the NRFU operation, the Census Bureau should share specific data on targeted efforts to recruit and hire staff with cultural competency and language skills.
 - Data on the group quarters that have responded will help state and local governments and associations support e-Response and reduce the need for in-person Group Quarters enumeration.
 - Additional detail on media buys by week, language, and geographic reach.
 - Call center metrics (abandonment rate, wait times, number of callback requests, time for callbacks, etc.) by language, so stakeholders can advise residents on how to best get through.



- Call center “daily top reasons for calling,” so GOTC groups and local 311 and 211 centers can help preemptively answer common questions and reduce call volume to census phone lines.
- **Post-Enumeration Survey:** Ensuring a robust and accurate post-enumeration survey operation, to ensure that measurements of net undercounts and overcounts, as well as gross errors (omissions, duplications, and other erroneous enumerations) are reliable, to illuminate any differential undercount in the 2020 Census and shed light on possible implications of the adjusted COVID-19 timeline and related operational modifications for census accuracy.

We share your commitment to a 2020 Census that is fair and accurate for all communities — particularly those that have been marginalized and historically missed in the past. Thank you for your consideration of our views. If you have any questions, please contact Beth Lynk, director of the Census Counts campaign at The Leadership Conference Education Fund, at lynk@civilrights.org.

Sincerely,

The Leadership Conference Education Fund

Census Counts Campaign

Advancement Project California

Advocates for Children of New Jersey

Alabama Coalition for Immigrant Justice

American Arab Anti Discrimination Committee

American Federation of State, County and Municipal Employees (AFSCME)

American Federation of Teachers

American Library Association

American Muslim Voice Foundation

Americans for Indian Opportunity

APANO



APAPA Texas

Arab American Institute (AAI)

Arkansas United

Asian American Federation

Asian American Legal Defense and Education Fund (AALDEF)

Asian Americans Advancing Justice - AAJC

Asian Americans Advancing Justice - Asian Law Caucus

Asian Americans Advancing Justice - Atlanta

Asian Americans Advancing Justice - Los Angeles

Asian Americans Advancing Justice | Chicago

Asian and Pacific Islander American Vote (APIAVote)

Asian Law Alliance

Asian Pacific American Labor Alliance

Association of Asian Pacific Community Health Organizations (AAPCHO)

ATNJ Education Fund

Austin Asian Complete Count Committee

Big Sky Chamber of Commerce

Bill Wilson Center

Black Belt Community Foundation

Boat People SOS Inc

California Association of Nonprofits

California Community Foundation

California Native Vote Project



California State Senate
Center for Civic Policy
Center for Employment Training
Center for Law & Social Policy (CLASP)
Central American Resource Center
Children's Defense Fund-Ohio
City of San Jose
Color of Change Education Fund
Colorado Latino Leadership Advocacy and Research Organization
Common Cause Education Fund
Common Cause New Mexico
Community Health Partnership of Santa Clara and San Mateo Counties
ConXion to Community
Cupertino Chamber of Commerce
EARLY MO
Empowering Pacific Islander Communities (EPIC)
Empowerment Congress of Doña Ana County
Equality California
Fair Count Inc.
Fair Immigration Reform Movement/Community Change
Faith in Public Life
Foothill-De Anza Community College District
Forefront

Forward Together

Georgia Association of Latino Elected Officials (GALEO)

Hispanic Federation

Hispanic Interest Coalition of Alabama

Human Rights Campaign

Immigrant Resettlement & Cultural Center

Impact Fund

Innovation Ohio Education Fund

International Children Assistance Network (ICAN)

International Rescue Committee

Japanese American Citizens League - San Jose Chapter

Kentucky Nonprofit Network

Kentucky Youth Advocates

LA Voice

Latino Community Foundation

Latino Network

Latino Policy Forum

League of United Latin American Citizens (LULAC)

League of Women Voters Education Fund

League of Women Voters of Connecticut

Massachusetts Immigrant and Refugee Advocacy

Massachusetts Voter Table

Mi Familia Vota Education Fund

Michigan Nonprofit Association

Montana Nonprofit Association

MontPIRG Leadership Fund

Morgan Hill Unified School District

NAACP Legal Defense & Educational Fund, Inc.

NALEO Educational Fund

National Action Network

National Association of Jewish Legislators

National Center for Transgender Equality

National Coalition for Literacy

National Coalition of 100 Black Women - Central Alabama

National Coalition on Black Civic Participation

National Community Action Partnership

National Congress of American Indians

National Council of Asian Pacific Americans

National Disability Rights Network

National Education Association

National LGBTQ Task Force

NAVA Education Project

North Carolina Child

Nebraska Civic Engagement Table

New York Immigration Coalition

NextDayBetter

Nonprofit VOTE

Northwest Health Foundation

Ohio Census Advocacy Coalition

Oklahoma Policy Institute

Padres & Jovenes Unidos

Pars Equality Center

Partnership for America's Children

PICO California

Poder Latinx

PolicyLink

ProgressNow NM Education Fund

Proyecto Juan Diego

Raíces

ReadyNation

San Jose/Silicon Valley NAACP

Santa Clara County Office of Education

Services, Immigrant Rights and Education Network (SIREN)

Silicon Valley Community Foundation

Silicon Valley Independent Living Center

Silver State Equality-Nevada

South Asian Network

Southeast Asia Resource Action Center (SEARAC)

State Voices

The Arc of the United States

The Florida Civic Engagement Table (FLCET)

The Health Trust

The Ohio Women's Public Policy Network

The United Methodist Church - General Board of Church and Society

Together We Count

UnidosUS

Union for Reform Judaism

United Presbyterians of Wilcox County, Inc.

United Way Bay Area

United Way of the Columbia Willamette

United We Dream

Vietnamese American Roundtable

Virginia Civic Engagement Table

Voices for Progress

YWCA USA

ZERO TO THREE