



November 15, 2022

Director Robert Santos  
U.S. Census Bureau  
4600 Silver Hill Road  
Washington, DC 20233

Re: Docket Number USBC-2022-0004

Dear Director Santos:

On behalf of the League of Women Voters of the United States (LWVUS), we write to offer comments on designing the 2030 Census. The League is deeply committed to ensuring the success of the decennial census processes and the ongoing efforts of the US Census Bureau. We believe in a full, fair, and accurate census, as the census is essential to all basic functions of our society.

The League is a century-seasoned, nonpartisan, nonprofit organization committed to protecting every person's freedom to vote. We are a grassroots group comprised of more than 500,000 members and supporters across more than 750 local and state Leagues nationwide. The League focuses on advocacy, education, litigation, and organizing to achieve our mission to empower voters and defend democracy.

The League's experience supporting the census includes education, Get Out the Count activities, and watchdog reporting. Local Leagues around the country share information and resources about how to participate and discuss the importance of the census in order to better understand our communities. The League also prepares materials to encourage participation and fair representation in the redistricting process which the census provides key data to accomplish. The League has worked on Complete Count Committees to share information about low-reporting areas and communicate where additional counting support was needed. LWVUS also took steps to ensure that Congress is doing its part to support the success of the census. We have supported and will continue to support [full funding](#) of the US Census Bureau's budget.

We have worked with the Census Bureau over the years to continue to improve the census process. As the Census Bureau conducts research on the design of the 2030 Census, we encourage the Census Bureau to prioritize ending prison gerrymandering, ensuring accurate counting, creating more accessible digital census options, and collecting data that is inclusive of all communities- including revising the standards for federal data on race and ethnicity.



## **Reaching and Motivating Everyone**

The collection of useful, objective data about our nation's demographics, housing, economy, and communities is vitally important. To reach and motivate people to complete the census, it is critical to account for the realities of counting communities of color, low-income populations, geographically hard-to-count constituencies, and young children, which are known to be undercounted due to barriers to census participation. Conversely, communities of non-Hispanic white people, older Americans, and homeowners are often overcounted. A census undercount or miscount will compromise the lives of millions of people and will cost more money to rectify in the long run. These challenges are not novel and have been present in decennial census activity in the past. The Census Bureau should consider and gather more information on the specific barriers faced by the diverse communities across the country in order to achieve the constitutionally required fair and accurate census count. These barriers can include items discussed in more detail below in our comments, such as lack of access to the internet to complete the online census, lack of disability-focused support, the misrepresentation of data through prison gerrymandering, lack of investment in partnership with Tribal Nations to address unique challenges to census completion in Native communities, and limited information catering to immigrant communities.

To that end, this research on the community-specific barriers to completing the census should also assess leveraging the strengths of partnerships with community-based organizations, like the League of Women Voters, who work to reach hard-to-count communities. This will support groups that participate in Get Out the Count efforts in understanding how and when households participate in the census process.

Expanding representation to more diverse identity groups on the census will produce better data and result in people feeling more motivated to complete the census when they see themselves reflected in the responses. The Census Bureau should review the addition of sexual orientation and gender identity (SOGI) data collection through the census and offer disability as its own category. Additionally, the Census Bureau should continue to urge the Office of Management and Budget (OMB) to revise the standards for federal data on race and ethnicity. This revision is critical to ensuring that the Census Bureau can fulfill its mission to produce full, fair, and accurate data on our nation's population and economy. Unsurprisingly, the ways in which people in the United States self-identify their race and ethnicity has evolved since the last revision of the race and ethnicity standards in 1997. Until the federal standards are revised, the data collected on these questions will remain incomplete, which is why it is critical to consider this as plans are made for the 2030 Census.

## **Technology**

We support the Census Bureau's efforts to modernize the collection of federal data in a time of advanced technological capabilities. The census should continue to drive toward a digital census, without leaving the paper census behind. Given the lack of computer or internet access in hundreds of thousands of households, we strongly support the Census Bureau's past practice of delivering a paper questionnaire to every non-responsive household. This communication should include translated instructions that let people know they can respond in the language which they are fluent online or by telephone. Technology use in the census should reflect the needs of all Americans- considerations to improving an increasingly digital census include accommodating areas with limited internet access, support for those with limited digital fluency, and disability-specific support.



Additionally, there are key pieces of information on digital census completion that can be studied now following the first opportunity for people to complete the census online in the 2020 Census. For example, in studying the data on incomplete digital census responses, it would be critical to understand where in the process respondents stopped and hypothesize as to why. To the extent possible, this data should be used to help improve the completion rate of online responses.

Research on digital participation should be broad- assessing unique digital needs in specific communities. The census might include in its research a review of how the use of digital tablets by census agents to assist people in completing the census changed the data-gathering process.

### **New Data Sources**

As new data sources are assessed to support the census data and better understand the diverse communities in our country, the League maintains that the American Community Survey data is not a good substitute for Census data. It is not appropriate to implement electoral district lines based primarily on American Community Survey (ACS) data. Data from the decennial census and data from the ACS are different, and each has appropriate applications, including in the area of redistricting. Among other compatibility issues, the decennial census is designed to be a count of all of the nation's residents as of one day every 10 years, while the ACS is a sample survey conducted annually on a rolling basis. Though there are specific and appropriate purposes for each data set in the context of redistricting, there are a number of reasons why ACS data are not fit to serve as the main source, or base, of total population for the purpose of drawing the final lines.

### **Contacting the Public**

In the spirit of reaching all communities and counting all people in this country, the constitutionally required task of the census, additional advertising should be devoted to ensuring that everyone fills out the form regardless of their citizenship status. The Census Bureau must put advertising dollars behind the message that everyone counts in this country, regardless of their language, citizenship status, nationality, or any other factor.

In conjunction with messaging supporting every person being counted, the Bureau should incorporate messaging about confidentiality into its earned and paid media strategy. People must know that the Census Bureau will not share data with landlords, law enforcement, or public benefit providers to ensure that everyone feels safe answering the form.

### **Providing Support to the Public**

#### **Partnering with Native Communities**

Native American communities face unique challenges in taking part in the census and as a result, this community is consistently undercounted according to Census Bureau reports. The Census Bureau should continue to study new ways to improve the census process in these communities by partnering with Tribal Nations to collect data and studying Native-led data collection programs.

#### **Support for Disability Communities**

Census research should continue to center the experience of people with disabilities in completing the census including ensuring widespread access to braille and large print materials as well as websites that are accessible for people with disabilities. When it comes to conversations surrounding fairness, accuracy, and accessibility, the disability community must be consulted and present. The Census Bureau



must provide greater transparency to the disability community including the adoption of accessible language for census materials to communicate (1) how data is collected and used, and (2) why Americans with disabilities should participate in the Census.

#### Prison Gerrymandering

In order to equitably count incarcerated people, the Census Bureau has the opportunity in the 2030 Census to assess changing its practice of counting incarcerated people at a prison address, in order to count people at their home address. The problem with this practice arises in the use of census data to determine political representation. The result is that people who live near correctional facilities get an inflated voice in government while the communities most impacted by mass incarceration suffer from a deflated voice. Importantly, other similar groups, like deployed military personnel and children at boarding schools, are usually counted at home. As many local governments and state governments have navigated the process of correcting redistricting data to account for census data skewed by prison gerrymandering, the Census Bureau may consider consulting the experience of those jurisdictions to smoothly transition to gathering census information for incarcerated people at their home address.

#### Language Access

Everyone deserves equal access to complete the census and be counted in their communities. Increasing the language accessibility of the census allows participants to be educated and feel confident completing the census. In our interconnected, digital world, it is easier than ever before to provide translated materials to communities who need support in languages other than English. People with limited English proficiency face unique challenges in completing the census. These barriers must be addressed to have a complete census to count all community members regardless of the language with which they are most comfortable. Language access should also consider the ability to advertise in new languages in ways that would best reach each language community.

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The Census Bureau is doing critical work to ensure counting of residents, which in turn supports the creation of fair districts and supports federal allocation of support to communities around the country. As we seek to build a country that works for all of us, understanding all of the people who make up our communities is integral to forming a representative democracy.

LWVUS hopes to continue to be a resource to the Census Bureau and appreciates the opportunity to respond to the Federal Register notice on the 2030 Census. Please do not hesitate to contact our staff via Jessica Jones Capparell, Director, Government Affairs at [JJonescapparell@lww.org](mailto:JJonescapparell@lww.org) or Kristen Kern, Federal Policy and Advocacy Manager at [kkern@lww.org](mailto:kkern@lww.org).

Sincerely,

A handwritten signature in black ink, which appears to read "Virginia Kase Solomón". The signature is written in a cursive, flowing style.

Virginia Kase Solomón  
CEO