



March 5th, 2026

Sheleen Dumas
Departmental PRA Clearance Officer
Office of the Under Secretary for Economic Affairs
U.S. Department of Commerce
Washington, DC 20253

Re: 2026 Operational Test in Support of the 2030 Census (FR Doc. USBC-2026-0034)

Dear Ms. Dumas:

The League of Women Voters of the United States (the League) appreciates the opportunity to comment on the 2026 Operational Test in Support of the 2030 Census described in the *Federal Register* Notice Docket Number USBC-2026-0034, "Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; 2026 Operational Test in Support of the 2030 Census" ("Notice").

The League is a 106-year-old nonpartisan nonprofit committed to ensuring that everyone is represented in our democracy. We are a grassroots organization comprised of over one million members and supporters in all 50 states and the District of Columbia across more than 800 local and state Leagues. The League focuses on advocacy, education, litigation, and organizing to advance our mission of empowering voters and defending democracy. We base our work on policy positions developed from multi-year studies and derived through consensus among League membership, to ensure our advocacy reflects best practices and a nationwide perspective.

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's experience supporting the census includes public education, Get Out the Count initiatives, and community engagement. The League is a critical partner to the Census Bureau across the country, as our local affiliates share information and resources on how to participate in the census count and



raise awareness about the importance of the census in better understanding 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. We have worked with the Census Bureau over the years to continue to improve the census process.

Accurate census data is a cornerstone of our democracy. A comprehensive field test of the Census Bureau's planned operational and outreach methods is critical to ensuring that the decennial census accurately counts all people residing in the United States. The League of Women Voters is concerned by the proposed scope for the 2026 Operational Test in Support of the 2030 Census. Due to the extremely limited population sample and significant methodological issues, the results of such a test would be of very limited utility for improving the effectiveness and cost-efficiency of decennial census operations.

We are particularly concerned about the following limitations and methodological issues for the 2026 test as proposed:

- 1. The proposed test does not include any community partnership engagement and eliminates testing of several methods to improve self-response in undercounted communities, including Mobile Questionnaire Assistance (MQA) centers and phone-based Census Questionnaire Assistance (CQA).** As a Census partner for the past three censuses, we are especially concerned with the lack of community partnership engagement in the plan, as this has been a core component of decennial census operations for decades, helping the Census Bureau to more effectively reach undercounted communities. Additionally, the MQA and CQA programs are critical to supporting self-response in undercounted groups, with MQAs being particularly important for communities with limited internet access or digital literacy.
- 2. Providing an internet self-response (ISR) option for the test in English only will further limit the representativeness of the test.** The 2016 Census Test provided ISR in English, Spanish, Chinese (Simplified), and Korean¹, and ISR for the 2020 Census was available in English, Spanish, Chinese (Simplified), Vietnamese, Korean, Russian, Arabic, Tagalog, Polish, French, Haitian Creole, Portuguese, and Japanese. The League believes in the importance of offering multilingual voter information to ensure broad voter engagement and access. For the census especially, which includes non-voting populations, multilingual ISR options in the 2026 test are critical to increasing self-response rates, improving data accuracy, and reducing in-field enumeration costs.

¹ Chapin, M. (2016, November 3). *2016 Census Test preliminary findings* [Presentation to the National Advisory Committee]. U.S. Census Bureau. <https://www2.census.gov/cac/nac/meetings/2016-11/2016-chapin.pdf>

3. **The proposed test’s sample is not representative of the nation’s population. This would severely curtail the value of its results for strengthening census operations, particularly for correctly enumerating groups at risk for an undercount.** In its final report on the fiscal year 2026 Commerce, Science, and Justice appropriations bill, Congress underscored the importance of carrying out the 2026 Census Test in “geographically and demographically diverse field sites nationwide, and with a nationally representative sample of households,” and called on the Census Bureau to “ensure the objectives of the 2026 Census Test are fully realized.”^{2,3} We are especially concerned by the following reductions in the proposed test’s scope compared to the pre-publication version of the *Federal Register* Notice for the 2026 test that was released and subsequently withdrawn in September 2025:
- **Elimination of test sites in Western Texas; Tribal lands within Arizona; Colorado Springs, Colorado; and Western North Carolina:** Scaling back the field test sites does not provide an adequate population sample for the 2026 Test. Eliminating four test sites excludes many groups at risk for an undercount, including residents of rural areas, Tribal lands, military bases and other Group Quarters facilities, and housing units that are more challenging to enumerate, such as seasonal housing and new construction. The original test sites were specifically selected to ensure representation of these groups in the 2026 Test, and their inclusion is crucial to the accuracy of the test. It is not too late to restore these test sites as recruitment for temporary Census Bureau 2026 test workers was already underway in several of the test sites, and these communities are ready to move forward with hosting the 2026 Test if these sites are restored.
 - **Elimination of the national sample component:** The current proposal does not include any national self-response testing component, which is critical to informing 2030 Census messaging, mailing strategies, and materials.
 - **Elimination of Group Quarters component:** This proposal does not include any testing of Group Quarters enumeration, even though Spartanburg and Huntsville were originally selected as test sites due in part to the variety of group quarters facilities they include. Previously proposed testing of a self-response option for Group Quarters residents, which would have examined whether a

² U.S. Senate Committee on Appropriations. (2025). *Departments of Commerce and Justice, Science, and Related Agencies Appropriations Bill, 2026* (Senate Report No. 119-44). U.S. Government Publishing Office. https://www.appropriations.senate.gov/imo/media/doc/fy26_cjs_senate_report.pdf

³ United States House Committee on Appropriations. (2026). *Division A – Commerce, Justice, Science, and Related Agencies Appropriations Act, 2026* (PDF). U.S. Government Publishing Office. <https://docs.house.gov/billsthisweek/20260105/Division%20A%20Commerce%20Justice%20Science.pdf>

self-response option would decrease follow-up costs and increase data accuracy, also does not appear in this Notice.

4. **Using any questionnaire other than the decennial census form to test census operations is not scientifically valid and will not produce useful information to improve 2030 Census operations and outreach.** The proposal to use the American Community Survey (ACS) instead of the census questionnaire would not be a useful practice. Not only is the ACS not reflective of the decennial census questionnaire in terms of content, but the ACS questionnaire is much longer, increasing self-response time from 10 minutes (decennial census form) to 40 minutes (ACS). Using the ACS form would significantly limit the usefulness of the data this test would produce for informing decennial census methodology.
5. **Testing the use of United States Postal Service (USPS) workers for in-field enumeration (IFE) presents major operational, legal, and cost-efficiency challenges.** Previous research in a 2011 Government Accountability Office report⁴ and 2019 Census Bureau report⁵ has already shown that this approach would increase census costs and disrupt mail service.

The funding and resourcing of critical infrastructure for many communities around the country depends on an accurate census in which undercounts are minimized as much as possible. To plan for this, the 2026 Test must be representative of the country's vastly differing populations in terms of residential conditions, geographic location, internet access, and language access, among other factors. Our country cannot afford to set the 2030 Census up for failure by allowing a 2026 Census Test with such significant scientific and methodological infirmities to move forward. Proceeding with the test as described in this Notice would constitute a gross misuse of the funds Congress has appropriated to the Census Bureau to improve the efficacy, accuracy, and cost-efficiency of census operations and outreach. Moreover, it would be a missed opportunity to effectively prepare for a fair, accurate, and comprehensive 2030 Census, jeopardizing the quality of census data for at least the next decade.

The League of Women Voters therefore calls on the Department of Commerce and the US Census Bureau to correct course and ensure an effective field test for the 2030 Census by:

⁴ Government Accountability Office. (2011). *Decennial Census: Census Bureau and Postal Service should pursue opportunities ...* (GAO-11-874). <https://www.gao.gov/assets/gao-11-874.pdf>

⁵ U.S. Census Bureau. (2019). *2020 research and testing: Proposed postal carriers as Census Bureau enumerators pilot* (Final Analysis Report). <https://www2.census.gov/programs-surveys/decennial/2020/program-management/final-analysis-reports/2020-report-postal-carriers-census-enumerators-pilot.pdf>



1. Restoring testing of community partnership engagement, Mobile Questionnaire Assistance (MQA) centers, and other methods to improve census response rates in undercounted communities.
2. Providing an internet self-response (ISR) option for the test in (at minimum) English, Spanish, Chinese (Simplified)⁶, and any other locally common languages in the test sites as well as restoring testing of other modes of self-response.
3. Restoring the national sample, Group Quarters component, and the four previously planned, now eliminated, test sites for the 2026 Test to ensure the representativeness of the test's sample.
4. Using only the decennial census form for the 2026 test to ensure its scientific validity for informing 2030 Census methods and less burdensome self-response times.
5. Including robust testing of in-field enumeration operations by trained and qualified Census Bureau employees and eliminating the proposed testing that would employ USPS employees for enumeration.

As a nonpartisan organization, the League of Women Voters is proud of its decades-long partnership with the Census Bureau, both as a get-out-the-count partner and as a stakeholder in the planning process. The League thanks you for your consideration of our views on these important issues related to the integrity of the 2026 Operational Test. We appreciate this opportunity to provide comments and look forward to continued engagement to ensure a successful 2030 Census. If you have any questions about these comments, please contact Jessica Jones Capparell at jjones@lwv.org.

Sincerely,

A handwritten signature in black ink that reads "Celina Stewart". The signature is written in a cursive, flowing style.

Celina Stewart

CEO

League of Women Voters of the US

⁶ Languages proposed for ISR testing in the Census Bureau's January, 2025, *Federal Register* Notice on the 2026 Census Test: *Agency information collection activities; Submission to the Office of Management and Budget (OMB) for review and approval; Comment request; 2026 Census Test—Peak Data Collection* (90 FR 1952). *Federal Register*. <https://www.federalregister.gov/documents/2025/01/10/2025-00270/agency-information-collection-activities-submission-to-the-office-of-management-and-budget-omb-for>