March 5, 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 undersigned organizations and individuals are writing to express their strong opposition to several components of 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" (the "February Notice").

We are a group of national and community-based organizations, advocates, Latino elected and appointed officials, and other Latino civic leaders, and many of us worked closely with the Latino community to promote participation in Census 2020 as well as prior decennials.
For the reasons set forth below, the proposed 2026 Census Test described in the February Notice would prevent the Bureau from conducting the assessment of enumeration strategies among a representative population of Latinos that is needed to reach and engage geographically, linguistically, and residentially diverse hard-to-count Latino communities. The plan lacks scientific rigor and would produce fundamentally flawed and incomplete data, impairing effective planning and worsening the persistent undercount of Latinos. It would also limit the Bureau's ability to improve cost-effectiveness and efficiency in Census 2030.

I. Introduction

Accurate and complete decennial census data help make our democracy stronger and are essential to safeguard the nation's prosperity and well-being. According to 2024 American Community Survey (ACS) data (one-year estimates), one in five U.S. residents is Latino (20.0%), and an accurate national count is impossible without a full and accurate count of the Latino community. For the Census Bureau to make sound and cost-efficient preparations for Census 2030, it must undertake thorough and scientifically rigorous evaluation of its outreach and operational methods which will produce reliable and useful results to inform its efforts for an accurate decennial enumeration of the Latino community.

There is a particularly critical need for sound evaluation of the Bureau's outreach and operational methods given the severe and historic national net undercount of Latinos in Census 2020 (4.99%). Moreover, there has been a persistent national undercount of very young Latino children (ages 0-4), which researchers William O'Hare and Susana Quiros found reached 8.6% in Census 2020, nearly double the national undercount of all very young children (5.4%). The Census Bureau cannot develop effective strategies to ameliorate these undercounts without

thorough research and assessment which encompass approaches to reaching the full diversity of hard-to-count Latino population groups.

In 2024, the Bureau announced a comprehensive plan for a 2026 Census Test of Census 2030 field operations. It had selected six test sites to evaluate enumeration strategies, using data and other criteria to select sites with an overall emphasis on designing strategies to improve enumeration of historically undercounted or hard-to-count populations. As part of its criteria, the Bureau explicitly indicated that it intended to select some rural sites, and areas with low or no Internet or cellphone connectivity.

The Bureau also intended to assess other operational components such as the Group Quarters operations; the full range of self-response modes (mail, telephone, and Internet); and partnership and field strategies, including Mobile Questionnaire Assistance (MQA). The test would have used the decennial Census questionnaire, with translation of materials into Spanish. Finally, the Bureau's initial proposal included a mailing to a national sample of the population.

As part of its planning, the Bureau engaged its 2030 Census Advisory Committee (CAC) and other advisory committees in its efforts, through presentations and discussions. This process provided significant transparency for the Bureau's planning, and an opportunity for consultation with and input from stakeholders with expertise on diverse population groups. Arturo Vargas of the NALEO Educational Fund chaired the 2030 Census Advisory Committee, and it provided recommendations to the Bureau on certain aspects of the 2026 Census Test, as part of its mission to enhance accountability from the Bureau.

In January 2025, the Bureau released a *Federal Register* Notice soliciting comments which suggested it intended to proceed with the 2026 Census Test as initially planned. However, after the release of that Notice, the Bureau failed to provide the public with any updates about the 2026 Test, until the February Notice. During that period, the Department of Commerce also abolished the 2030 CAC and other Bureau advisory committees, claiming they had fulfilled their purposes. The elimination of the advisory committees further contributed to the failure of the Bureau to obtain input on the 2026 Census Test from experts and other stakeholders, and the lack of transparency about the Bureau's future plans for the test.

II. The Bureau's proposed changes to the 2026 Census Test will produce fundamentally flawed results, setting Census 2030 up for failure by undermining the Bureau's ability to accurately count Latinos and the entire nation

There are several components of the Bureau's proposed changes to the 2026 Census Test that would severely impair the sound and scientifically rigorous assessment needed for the Bureau's Census 2030 preparations. In particular, the following deficiencies will prevent a fair and accurate decennial count of Latinos:

1. Reduction of test sites

The Bureau plans to eliminate four of the test sites it initially proposed, leaving only Spartanburg, South Carolina and Huntsville, Alabama, neither of which have significant Latino populations. By eliminating the site in Western Texas, which includes *colonias,* the Bureau will

fail to assess operations in a rural area with a large Latino population which has been historically undercounted for several reasons. This area includes Latino residents who lack Internet or cellphone access, and may have low English-language proficiency and data literacy. Many Latinos in this region also live in "hidden housing" (such as converted garages, sheds, or trailers) or in residences with non-mailable addresses.

Eliminating the site in Colorado Springs further excludes suburban Latinos and those living in military installations. The proposed 2026 Census Test site reductions would also neglect tribal communities in Arizona and Western North Carolina. Ultimately, scaling back test sites would prevent assessment in areas that more fully reflect the nation's population and would severely limit the Bureau's ability to evaluate strategies for reaching geographically, linguistically, and residentially diverse Latino communities. In this connection, in its report on its fiscal year 2026 Commerce, Science, and Justice appropriations bill, the Senate Appropriations Committee 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."[1]

2. Use of questionnaire which includes a citizenship question

We understand the Bureau intends to use a version of the ACS questionnaire in the 2026 Census Test, a form which is much lengthier than the decennial form and includes a citizenship question. First, using a questionnaire that is significantly different from the one that will be used in the 2030 Census undermines testing of true decennial census operations. It is not scientifically valid and would not produce useful information to improve 2030 Census operations and outreach

Additionally, extensive research shows that a citizenship question deters participation among Latino and immigrant communities. In 2019, the Supreme Court blocked the addition of a citizenship question to the 2020 Census because the first Trump administration attempted to do so illegally. The current administration has indicated it will again attempt to add such a question for Census 2030. Testing this question only in sites without significant Latino or immigrant populations would likely mask its harmful effects and generate misleading data — potentially paving the way for its inclusion in 2030.

3. Elimination of mail and phone response testing

The Bureau would test only Internet response. However, while the digital divide has narrowed, many Latino households still lack broadband access or digital literacy, and many have preferred to respond to the Census by mail or phone. For example, a 2021 Pew Research Study showed that Latinos had less access to home computers than non-Hispanic Whites (67% compared to 80%), as well as lower access to home broadband (65% compared to 80%).

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[1] 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

Limiting the 2026 Census Test to Internet-only responses—and excluding sites with large Latino populations that lack broadband access (as noted above)—will not produce reliable data on how to reach the hardest-to-count communities. Failing to test mail and phone response modes ignores longstanding Latino response patterns, limiting the Bureau's ability to make sound assessments to improve participation.

4. Removal of the national sample component

The current proposal does not include any national self-response testing component, which harms the representativeness of the 2026 Census Test's sample. This failure will significantly weaken the Bureau's ability to develop effective Census 2030 messaging, mailing strategies, and materials that would improve self-response rates.

5. Elimination of Spanish-language Internet testing

The Bureau has also indicated that it will not translate response materials into Spanish. However, according to 2024 ACS data (one-year estimates), 29% of Latinos lack full fluency in English, and the lack of Spanish-language materials would prevent meaningful testing of strategies to engage these Latinos, who are already at high risk of undercount.

6. Removal of community engagement and assistance components

The Bureau's proposed plan would eliminate assessment of community partnerships and trusted messengers; communications strategies; and MQA operations. Community engagement and assistance strategies have proven critical in reaching hard-to-count Latino communities and building trust, which is even more important in an environment where the Administration's aggressive immigration enforcement activities and data-sharing practices have created widespread fear in Latino and immigrant communities about having any contact with or providing personal information to federal government employees.

Failure to assess community partnership strategies in the 2026 Census Test is particularly egregious given the Commerce Department's abrupt termination of the Census Bureau's advisory committees in February 2025. As noted above, the advisory committees served as a critical forum for gathering input from stakeholders with expertise in reaching undercounted communities, and failure to test approaches to engaging community partners will exacerbate this loss.

7. 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. Many Latinos reside in group quarters; failing to test these operations neglects a significant segment of the community.

8. Proposed testing of USPS workers for in-field enumeration

The proposal to test the use of United States Postal Service (USPS) employees for in-field enumeration presents serious operational, legal, and cost-efficiency concerns. Prior research[2] has indicated that such an approach could increase costs and delay mail service[3]. More fundamentally, unresolved conflicts between Title 13 confidentiality protections governing Census Bureau employees and Title 39 provisions applicable to USPS employees create unacceptable risks regarding data confidentiality. Until these legal discrepancies are resolved transparently and definitively, such testing should not proceed.

Ultimately, the Bureau's proposed 2026 Census Test revisions would irreparably damage the foundation needed to ensure an accurate count of Latinos in Census 2030. Without sound and meaningful testing, the nation risks deepening disparities that prevent fair resource allocation and representation for Latino communities.

III. Recommendations and Conclusion

The proposed 2026 Census Test would produce results that lack scientific rigor and would prevent effective preparation for a fair and accurate Census 2030. Proceeding with the test as described in the February Notice would also constitute a gross misuse of the funds Congress has appropriated to the Bureau to improve the efficacy, accuracy, and cost-efficiency of census operations and outreach. Ultimately, the proposal would set Census 2030 up for failure, jeopardizing the quality of Census data for at least the next decade.

We therefore urge the Department of Commerce to:

- Restore all six originally planned field test sites.
- Use only the decennial census form for the 2026 test, without the inclusion of a citizenship question.
- Restore comprehensive testing of mail, phone, and multilingual Internet response modes.
- Reinstate the national sample mailing and self-response component.
- Restore testing of community outreach, partnerships, and mobile assistance strategies.
- Restore testing of Group Quarters enumeration.
- Eliminate proposed testing of USPS employees for enumeration unless legal and operational concerns are fully resolved.
- Ensure transparency by publishing a detailed analysis of test results and engaging meaningfully with stakeholders.

Thank you for considering these comments. We appreciate the opportunity to provide input on this critical matter and stand ready to work with the Department of Commerce and the Census Bureau to ensure that the 2026 Census Test and the 2030 Census are conducted with integrity, scientific rigor, and a commitment to accurately counting Latinos and every community.

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[2] 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

[3] Government Accountability Office. (2011). *Decennial Census: Census Bureau and Postal Service should pursue opportunities …* (GAO-11-874). https://www.gao.gov/assets/a585539.html

Please contact Rosalind Gold, Chief Public Policy Officer of the NALEO Educational Fund, rgold@naleo.org, if you have any questions about this letter.

Sincerely,

Organizations
afrolatin@ forum
Afro-Latino Coalition
Alianza Center, Inc
Arab American Institute (AAI)
Catholic Charities New York
Chinese-American Planning Council (CPC)
Coalition on Human Needs
Common Cause
Community Resource Center
Hispanic Federation
Immigration Resource Center of San Gabriel Valley
Labor Council for Latin American Advancement (LCLAA)
LADEI
Latino Community Foundation
LatinoJustice PRLDEF
League of United Latin American Citizens (LULAC)
MACS 2030 - Minnesotans for the ACS and 2030 Census
Make the Road New York
Make the Road States
Massachusetts Immigrant and Refugee Advocacy Coalition
Mi Familia en Acción
Mi Familia Vota
National Association of Hispanic County Officials (NAHCO)
National Dominican Women's Caucus
National Haitian American Elected Officials Network (NHAEON)
National Hispanic Media Coalition
National Network for Arab American Communities
New Jersey Institute for Social Justice
New York Women's Chamber of Commerce
Prison Policy Initiative
Progreso Latino
The League of Women Voters of the United States
YMCA of Greater New York

Local Governments
City of Bell Gardens, California
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