



ASIAN AMERICANS  
**ADVANCING  
JUSTICE**

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:

Asian Americans Advancing Justice (Advancing Justice), a national affiliation of four independent nonprofit organizations dedicated to serving our nation's most rapidly growing racial minority communities, 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").

Advancing Justice actively works to ensure fair and accurate governmental data collection efforts, including the decennial census, because of the importance of data to Asian Americans and Native Hawaiians and other Pacific Islanders (NHPs). The Advancing Justice affiliation is comprised of our nation's largest legal and civil rights organization for Asian Americans and Pacific Islanders located in Los Angeles (Advancing Justice Southern California), the largest national Asian American policy advocacy organization located in Washington, D.C. (Advancing Justice – AAJC), the leading Midwest Asian American advocacy organization (Advancing Justice – Chicago), and the Atlanta-based Asian American advocacy organization that serves one of the largest and most rapidly growing Asian American communities in the South (Advancing Justice – Atlanta).

According to the Census Bureau's 2024 Population Estimates, there are nearly 27 million Asian Americans and over 1.8 million NHPs living in the United States. Our communities are the fastest growing in the country: the nation's Asian American and NHPs populations grew 12.8% and 9.4%, respectively, between 2020 and 2024.<sup>1</sup> The success of the 2030 Census depends on the full participation and cooperation of all segments of the American people, including immigrant communities and those who are limited-English proficient (LEP). Advancing Justice has been working to eliminate the barriers that have historically resulted in the undercounting and underreporting of Asian Americans and NHPs in federal data collection and analysis efforts, particularly in the decennial census count. Advancing Justice has conducted

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<sup>1</sup> Annual Estimates of the Resident Population by Sex, Race, and Hispanic Origin for the United States: April 1, 2020 to July 1, 2024 (NC-EST2024-SR11H)

comprehensive national, state, and local outreach and education efforts focused on Asian American and NHPI communities for Census 2000, Census 2010, and Census 2020. We consider a fair and accurate decennial census and the American Community Survey (ACS) among the most significant civil rights issues facing the country today. We appreciate the importance of fact-based analyses for identifying disparate access and outcomes and devising effective solutions.

Accurate census data are 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. Advancing Justice is extremely concerned by the proposed reduced scope for the 2026 Operational Test in Support of the 2030 Census. The test described in this Notice would represent an operational field test for the 2030 Census in name only. 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 fully support the recommendations outlined in the public comment submitted by the Leadership Conference on Civil Rights for this FRN. In addition, we are specifically concerned that the following limitations and methodological issues proposed in the FRN for the 2026 test will have a negative impact on a fair and accurate count of the Asian American population:

1. **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 American Community Survey (ACS) Methods Panel is designed to test outreach and operational methods for the ACS, *not* the decennial census. The ACS questionnaire is decidedly longer than the decennial questionnaire, takes four times longer to complete, and asks different questions, including a citizenship question, making it inappropriate for testing decennial census operations. Using the ACS form would significantly limit the usefulness of this test for informing decennial census methodology.
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 Korean<sup>2</sup>, 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. Multilingual ISR options in the 2026 test are critical for increasing self-response rates among Asian Americans and NHPIs. Asian Americans have among the highest LEP rates; 27% of Asian Americans and 8% of NHPI are LEP. LEP rates vary considerably among Asian American and NHPI ethnic groups, and many ethnic groups, such as Burmese (60%), Bhutanese (60%), Vietnamese (44%), Bangladeshi (43%), Nepalese Americans (43%), and others, face disproportionately high language

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<sup>2</sup> 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>



barriers.<sup>3</sup> Additionally, many Asian American community members prefer to complete the census questionnaire in paper format, which is not included as part of the proposed census test.

3. **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).** Community partnerships have been a core component of decennial census operations for decades, helping the Census Bureau to more effectively reach undercounted communities. The 2020 Census Barriers, Attitudes, and Motivators Study Survey Report showed that Asian Americans were least likely to report that they planned to fill out the census, were least familiar with the census, and had the lowest level of trust in the federal government compared to other major race and ethnic groups.<sup>4</sup> The need for the Census Bureau to work with trusted community-based voices to spread the messaging about the importance and benefits of census participation is vital to a fair and accurate count. Strengthening these partnerships is an essential element of pre-decennial field testing, and their removal from the 2026 test will undermine the Bureau's ability to work effectively with local partners in the 2030 Census. The MQA and CQA programs are also critical to supporting self-response in undercounted groups, with MQAs being particularly important for communities with limited internet access or digital literacy.
4. **Testing the use of United States Postal Service (USPS) workers for in-field enumeration (IFE) presents major operational, legal, and cost-efficiency challenges.** The current proposal's testing of in-field enumeration is limited to small-scale tests, which include a pilot of employing postal workers to carry out IFE. However, previous research in a 2011 Government Accountability Office report<sup>5</sup> and 2019 Census Bureau report<sup>6</sup> have already shown that this approach would increase census costs and disrupt mail service.

Moreover, previous considerations of employing USPS workers as census enumerators surfaced an irreconcilable difference in legal governance structure between Title 13, which governs Census Bureau employees, and Title 39, which governs USPS employees. Title 39 allows Postal Service employees to share information with law

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<sup>3</sup> U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates, Table B16004

<sup>4</sup> U.S. Census Bureau, 2020 Census Barriers, Attitudes, and Motivators Study Survey Report.

<https://www2.census.gov/programs-surveys/decennial/2020/program-management/final-analysis-reports/2020-report-cbams-study-survey.pdf>

<sup>5</sup> 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>

<sup>6</sup> 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>



enforcement and others under certain circumstances,<sup>7</sup> whereas Title 13 explicitly forbids sharing of individuals' census data for *any* purpose.<sup>8</sup> Until the Department of Commerce addresses and publicly communicates a solution to this critical discrepancy, there should be no testing of postal workers to carry out census operations.

Advancing Justice is also concerned about the ability of the Postal Service to adequately provide language assistance for LEP immigrant populations. The Census Bureau has been able to send follow-up enumerators with the right language skills to locations after the initial follow-up visit to meet any language needs of a household. In addition, in rural areas and in urban areas with complex housing situations, mailing addresses do not equate to housing units. Census enumerators are specially trained over several months to identify language needs and complex housing situations as well as to use the specially designed Census enumeration systems.

5. **Elimination of test sites in Western Texas; Tribal lands within Arizona; Colorado Springs, Colorado; and Western North Carolina:** Eliminating these four test sites reduces the ability of the Census Bureau to learn more about what works to reach various 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 elimination of Colorado Springs, Colorado, in particular, excludes the largest population of Asian Americans from the original six test sites, thereby reducing the Census Bureau's ability to learn about the potential impact of methodological changes on the Asian American count.
6. The nation 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.

We therefore call on the Department of Commerce to correct course and ensure an effective field test for the 2030 Census by:

1. Using only the decennial census form for the 2026 test to ensure its scientific validity for informing 2030 Census methods.

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<sup>7</sup> 9 C.F.R § 266.3

<sup>8</sup> 13 U.S.C. §§ 9, 214



2. Providing an internet self-response (ISR) option for the test in (at minimum) English, Spanish, Chinese (Simplified),<sup>9</sup> and any other locally common languages in the test sites, and restoring testing of other modes of self-response.
3. Including a paper questionnaire self-response option for the test.
4. Restoring testing of community partnership engagement, Mobile Questionnaire Assistance (MQA) centers, and other methods to improve census response rates in undercounted communities.
5. Restoring the national sample, Group Quarters component, and the other four previously planned test sites to the 2026 Test to ensure the representativeness of the test's sample.
6. Including robust testing of in-field enumeration operations by trained and qualified Census Bureau employees and eliminating proposed testing of employing USPS employees for enumeration.

Thank 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 Terry Ao Minnis, Vice President of Census and Voting Programs, Asian Americans Advancing Justice – AAJC, at [tminnis@advancingjustice-aaajc.org](mailto:tminnis@advancingjustice-aaajc.org) or 202 815-4412.

Sincerely,

Asian Americans Advancing Justice - Asian American Justice Center

Asian Americans Advancing Justice - Atlanta

Asian Americans Advancing Justice - Chicago

Asian Americans Advancing Justice Southern California

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<sup>9</sup> 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>

