



ASIAN AMERICANS
**ADVANCING
JUSTICE**
AAJC

February 17, 2026

American Community Survey Office (ACSO)
U.S. Census Bureau

Submitted via email: acso.pra@census.gov

RE: Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request: American Community Survey and Puerto Rico Community Survey (Docket Number: 2025-23329) (90 FR 59485)

Dear ACSO:

Asian Americans Advancing Justice – AAJC (Advancing Justice – AAJC) appreciates the opportunity to comment in response to the notice published in the Federal Register on December 19, 2025, regarding the revisions of the American Community Survey (ACS) and Puerto Rico Community Survey (PRCS), prior to the submission of the information collection request to OMB for approval. Our comments will focus on the ACS.

As the Federal Register notes, the ACS is one of the most important sources of information on the state of the nation. We are especially interested in how the Asian American community is represented in this data. The ACS is crucial to our community, ensuring that all Asian Americans have access to equal opportunities. Data must be collected in a comprehensive and timely manner, as well as in a way that disaggregates data for different detailed Asian American subgroups. We appreciate the opportunity to comment on the proposed changes to content of the ACS including the updated race and ethnicity question, which follows OMB’s 2024 Statistical Policy Directive No. 15 (SPD 15).

Organizational Background

Advancing Justice – AAJC is a national non-profit, non-partisan organization founded in 1991. For over thirty years, we have served as a leading Asian American voice on civil rights issues in our nation’s capital. Our mission is to advance civil and human rights for Asian Americans and to build and promote a fair and equitable society for all.

Advancing Justice – AAJC considers data collection and reporting critical to achieving its mission. We have been working to eliminate the barriers that have historically resulted in the undercounting and underreporting of Asian Americans in federal data collection and analysis efforts. We have conducted comprehensive national, state, and local outreach and educational projects focused on the Asian American communities for Census 2000, Census



2010, and Census 2020. Ensuring our communities “see” themselves in how race and ethnic data are collected is an important aspect of our advocacy and engagement on data collection and reporting. We appreciate the importance of fact-based analyses for identifying disparate access and outcomes and devising effective solutions. In addition to extensive work engaging on census policy and community outreach and education to encourage participation in the surveys conducted by the Census Bureau, Advancing Justice – AAJC has been a key stakeholder in discussions over SPD-15. Finally, more than three hundred local organizations are involved in Advancing Justice – AAJC’s Community Partners Network, serving communities in thirty-seven states and the District of Columbia.

Comments on the revisions of the ACS and PRCS

Our comments on the four requested areas:

(A) Evaluate whether the proposed information collection is necessary for the proper functions of the Department, including whether the information will have practical utility

The adoption of the updated race and ethnicity question under the 2024 SPD 15 is vital to accurately reflect the changing demographics of the country. From 2020 to 2024, the six largest Asian American groups: Asian Indian; Chinese, except Taiwanese; Filipino; Vietnamese; Korean; and Japanese; accounted for 80 percent of the Asian American population but only 55% of the numeric growth. Smaller Asian American groups such as Bangladeshi Americans, growing by 42% since 2020, Nepalese Americans (40%), and Burmese Americans (31%), represent newer Asian American communities. The changes to SPD 15 will allow for more accurate collection of self-identifying responses to the race and ethnicity questions and reduce confusion by respondents as to how to respond to the question.

The ACS represents the only other source of government data on smaller Asian American groups outside of the decennial census. The ACS is used to allocate billions of federal funds and is also used at state and local levels to allocate government funding for roads and infrastructure, education, and public health and safety. As the Census Bureau states, a question is added to the ACS only when another federal agency proposes it and shows that the data collected is important to the mission of the agency.¹

The ACS also has great practical utility for businesses and nonprofit organizations. The data are used by businesses in the Asian American community to identify new neighborhoods to

¹ [How a Question Becomes Part of the American Community Survey](https://www.census.gov/content/dam/Census/library/visualizations/2017/comm/acs-questions.pdf),
<https://www.census.gov/content/dam/Census/library/visualizations/2017/comm/acs-questions.pdf>



site their businesses. Nonprofits use ACS data for grant applications to demonstrate demand for their services and to track effectiveness of their programs. For Advancing Justice – AAJC, the ACS represents the primary source of data to support our advocacy work, and our work would be much harder without the ACS.

Collecting detailed Asian American group data is vital to show the diversity of experiences and needs among the different Asian American groups. For example, the rate of limited English proficiency, which is important for determining how government can best communicate with their constituents among other uses, ranges from a high of 54 percent among Burmese Americans to a low of 11 percent for Japanese Americans.

(B) Evaluate the accuracy of our estimate of the time and cost burden for this proposed collection, including the validity of the methodology and assumptions used

While the estimate of time and cost burden is accurate for English and Spanish-speaking respondents, additional time should be allocated to other limited English proficient (LEP) respondents who speak languages other than English and Spanish. The 2024 5-year ACS reports that 22 percent of households that speak an Asian or Pacific Island language at home were limited English-speaking households, which represents 1.2 million households. This means that those households will likely need to find help from outside of the household to fill out an English-based ACS form. The Census Bureau needs to account for the additional person-hours that a translator would spend to fill out the form alongside a respondent, the added time needed to find and use in-language guides for self-response, or the added time needed to navigate for in-language assistance for telephone response. A robust language assistance program with community outreach and easily accessible translated resources would both reduce respondent burden hours and divert LEP respondents away from more resource-intensive data collection operations, such as personal visits, and toward self-response.

(C) Evaluate ways to enhance the quality, utility, and clarity of the information to be collected

Implementing 2024 SPD 15

OMB's release of its new, updated SPD 15 standards (2024 SPD 15) in March 2024 required the collection of further detail beyond the minimum categories, the use of one combined question to ask about race and ethnicity, and the inclusion of a Middle Eastern or North African (MENA) category. We previously submitted comments under ACS SPD 15 (Docket Number: 240708-0186) (89 FR 57124) that highlighted the need for research and testing to resolve critical issues in implementing SPD 15.² One major issue we highlighted centered

² <https://www.regulations.gov/comment/USBC-2024-0020-0243>



on crosswalk concerns and recommendations and we continue to suggest that the Census Bureau should keep working on improving the bridging methods for the crosswalk, including perhaps relying on a combination of race, ancestry, and place of birth from the ACS to create bridging factors.

The revised standards marked an important step forward, particularly in allowing for more disaggregated data on Asian American communities, who are among the fastest growing and most diverse racial groups in the United States. Often viewed as homogenous, these communities include around forty detailed subgroups that can differ dramatically across key social and economic indicators, as noted in the previous section. Data disaggregation is critical because it allows us to see these differences. When data are not disaggregated, broad trends can mask much more negative or nuanced outcomes for specific subgroups of people, leaving their needs and issues invisible and unmet.

Census data are the building blocks for our society. They are the basis for reapportioning political representation and redistricting at all levels, informing effective and efficient policy and planning decisions, and distributing more than \$2.8 trillion in federal funds to the states during fiscal year 2021.³ Without an accurate count of Asian Americans, policy and planning decisions will not address the needs of growing Asian American communities. The implementation of these revised standards to the ACS is an important moment to advance and modernize how our country collects and reports data on our communities. As a standard bearer for all federal agencies and other data collection entities, the Census Bureau must take the appropriate steps necessary to ensure that the implementation of 2024 SPD 15 addresses the needs of all communities.

The ACS race and ethnicity question should be designed to collect as much self-identifying racial information as possible and in consideration of privacy needs and concerns. We have seen the population of Asian Americans grow faster outside the six largest groups (Asian Indian, Chinese, Filipino, Japanese, Korean, and Vietnamese) since 2000. The share of the remaining Asian categories in the 2000 to 2020 Censuses has increase from 12% in 2000 to 20% in 2020. The largest group in the other Asian category is Pakistani Americans, which has grown from 409,163 in the 2010 Census to 687,942 in the 2020 Census. If this trend continues, the Pakistani American population should approach one million members by the end of this decade. If detailed Asian group data are not collected, the Census Bureau would not be able to track when a detailed Asian group category becomes large enough to be reported in ACS data products, such as Selected Population Profiles and Selected Population Tables.

³ <https://www.census.gov/library/working-papers/2023/dec/census-data-federal-funds.html>



Meaningful Public Engagement

It is imperative that the Census Bureau continues to implement the 2024 SPD 15 and engages the public effectively and meaningfully. This will ensure that the Bureau produces more accurate and useful race and ethnicity data. Incorporating information on different types of engagements with the public and the frequency of those engagements can help produce better data in the long run. These engagements are especially important given the nation's ever-changing demographics and the ways in which racial and ethnic categories are socially constructed and change over time.

The public would also greatly benefit from engagement on ensuring racial and ethnic communities understand the question and response options under 2024 SPD 15. The Census Bureau must engage with interested stakeholders throughout the process of implementing the updated standards, including the collection of race and ethnicity data using a combined question and the use of a new MENA category. Active public engagement will not only ensure the accuracy of federal data, involving impacted community members early in the process gives them ownership over the content and outcome—building trust in the democratic process and potentially incentivizing increased participation. It is imperative that community organizations and leaders are engaged and consulted on these issues moving forward because mistakes and inaccuracies occur in the absence of community input.

We offer the following as best practices for community engagement:

- Engage interested stakeholders early and often. Bringing community members into the conversation early in the planning process can circumvent mistakes and inaccuracies—which undermine trust in the federal government and broader efforts to collect data on impacted communities.
- Engage with a diverse set of stakeholders, including both community-specific partners as well as those representing a more pan-ethnic perspective.
- Be specific about what is being discussed, any requests being made of the community, and what specific information the agency is attempting to obtain. In instances of prior engagement, it is incumbent on the agency to highlight any major changes that have occurred or are being considered at the point of the most recent request, as well as lifting up any points of potential controversy for feedback. Providing specific requests and the requisite background information will only help groups provide the most useful feedback to the agency.



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(D) Minimize the reporting burden on those who are to respond, including the use of automated collection techniques or other forms of information technology.

We do not believe the proposed changes to the race and ethnicity question would result in any additional burdens for respondents. The information collection does not require additional information and only varies in how the information is asked and collected.

Conclusion

We thank the Census Bureau for the opportunity to comment on the proposed changes to the ACS. As indicated in our comments, we believe that moving forward with the implementation of 2024 SPD 15 as swiftly as possible is important. We believe that the Census Bureau must continue meaningful engagement with community groups on these issues of implementation; continued coordination with advocacy groups will ensure that data are accessible and usable for the broader public and will help move the implementation process along more efficiently. If you have any questions, please contact me at tminnis@advancingjustice-aajc.org or 202 815-4412.

Sincerely,

Terry Ao Minnis
Vice President of Census and Voting Programs
Asian Americans Advancing Justice - AAJC