ASIAN AMERICANS ADVANCING JUSTICE AAJC

VIA Email (adrm.pra@census.gov)

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RE: Qualitative Research to Improve 2030 Census Communications 91 FR 63259 (October 5, 2026)

Dear Ms. Class:

Asian Americans Advancing Justice – AAJC (Advancing Justice – AAJC) submits this comment in response to the Census Bureau's federal register notice on its proposed information collection on Qualitative Research to Improve 2030 Census Communications, 91 FR 63259 (October 5, 2026). We urge the Census Bureau to adopt a comprehensive research approach to inform the development of an integrated partnership and communications campaign for 2030, which is critical to reach those hardest to count and helping to achieve a fair and accurate census, including Asian Americans who have been traditionally hard-to-count for a multitude of reasons. The Census Bureau early in this decade adopted a plan to conduct the Census Barriers, Attitudes, and Motivators Study (CBAMS) throughout the decade before 2030 which would have helped to further illuminate these reasons and then provide the opportunity to craft an integrated partnership and communications campaign that would address these reasons and properly encourage participation. Without proper and timely communications research, even more of our communities are vulnerable to being missed. We believe the proposed collection of information is necessary for the proper performance of the functions of the agency. If provided in a timely fashion, the information shall have practical utility. We further offer ways to enhance the quality, utility, and clarity of the information to be collected. We note that this is merely one step towards a much needed, more comprehensive and rigorous communications research agenda as well as an integrated partnership and communications campaign for 2030.

Organizational Background

Advancing Justice – AAJC is a national nonprofit, non-partisan organization founded in 1991. Our mission is to advance the civil and human rights of Asian Americans and to build

and promote a fair and equitable society for all. Advancing Justice – AAJC considers the census, including the American Community Survey (ACS), to be the backbone of its mission. Advancing Justice – AAJC maintains a permanent census program that monitors census policy, educates policy makers, and conducts community outreach and education on the surveys conducted by the Census Bureau. Advancing Justice – AAJC has 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, particularly in the census count. Advancing Justice – AAJC has served as a member of numerous advisory committees to the Census Bureau since 2000, including the National Advisory Committee on Racial, Ethnic and Other Populations, for which Advancing Justice – AAJC served two three-year term through August 2019, and its Vice President of Census and Voting served on the 2030 Census Advisory Committee. Additionally, Advancing Justice – AAJC currently co-chairs the Leadership Conference on Civil and Human Rights' Census Task Force and serves as co-coordinator of Census Counts, a campaign that brings together community-based organizations across a wide spectrum of advocacy: civil rights, immigrant, LGBTQ, disability, infant and child, poverty and homelessness, faith-based, labor, health care, education, youth, and more.

In addition to extensive work engaging on census policy, Advancing Justice – AAJC conducts community outreach and education to encourage participation in the surveys conducted by the Census Bureau and on census policy issues with the more than three hundred local organizations involved in Advancing Justice – AAJC's Community Partners Network, serving communities in thirty-seven states and the District of Columbia. Advancing Justice – AAJC conducted national outreach and educational campaigns focused on Asian American communities for Census 2000, Census 2010, and Census 2020. Advancing Justice – AAJC was the 2020 Census national resource hub for the Asian American and Native Hawaiians and Pacific Islander communities.

Challenges to an Accurate Count of Asian Americans

The Asian American population in the United States is larger than it has ever been in our nation's history. As of 2024, there are currently 27.8 million Asian Americans in the U.S., up from 17.3 million in 2010 and 11.9 million in 2000.[1] Asian Americans represent one of the fastest growing groups since 2010, growing by 60 percent. Of this rapidly growing segment of the population, about half are foreign-born and about one in four of the Asian American population, over 6.1 million people, is considered limited English proficient (LEP).[2] This combination of factors indicates that a significant segment of the population is at a substantial disadvantage — both linguistically and culturally — when it comes to participation in the census.

[1] U.S. Census Bureau. 2024 American Community Survey, Table B02011. 2010 Census, DEC Summary File 1, Table P6. 2000 Census, DEC Summary File 1, Table P009.
[2] U.S. Census Bureau. American Community Survey 1-Year Estimates Selected Population Profiles, Table S0201.

In focus groups of Asian Americans conducted for the 2020 Census, many indicated a lack of awareness about the census and had not heard of the Census Bureau.[3] Indeed, many found the idea of the census not only confusing, but invasive and potentially threatening. Asian Americans, especially recent immigrants from countries with oppressive governments, believed that the census is linked to immigration enforcement entities or the Internal Revenue Service (IRS). The Asian American focus groups further noted a lack of understanding about the purpose of the census, how the data are used, and any direct benefit to them or their community from participating in the census. Lastly, English-language proficiency issues and the lack of availability of in-language materials were noted as barriers to census participation by Asian Americans.

Even more challenges exist to an accurate count of Asian Americans for the 2030 Census than in previous census counts. Immigration continues to drive much of the growth in the community, and with that, there is an increase in diversity of the Asian American community. The ethnic, religious, linguistic, and generational makeup of the community has significantly changed in recent decades, resulting in more difficulty in reaching the community through any one medium. The Asian American community has grown 60 percent between 2010 and 2024, with even higher growth rates in nontraditional gateway cities and regions of the country that do not have extensive community infrastructure to serve the Asian American community. There are generally high levels of mobility among some segments of the Asian American population, and Asian Americans tend to live in more complex, multi-family and/or multigenerational households. Asian immigrants are increasingly reluctant to voluntarily provide personal information to the government, particularly at this time with increased incidences of identity theft, increased immigration enforcement, and increased hostility to immigrants and others. In fact, the increase in virulent anti-immigrant rhetoric has resulted in reports of immigrants avoiding common activities out of fear of reprisal from the government. The likelihood that the community would be willing to provide specific information about them and their families to the federal government is not high.

On top of these challenges for the community, the 2030 Census will be significantly different from the previous censuses, including proposed major changes to question formats, the potential increased reliance on administrative records to replace in-field, on-the-ground efforts by census staff, and a reduction in field infrastructure, all of which could have a detrimental impact on an accurate count of the community. Compounding these challenges is the continued inadequate funding for the Census Bureau that has compromised their ability to conduct all the necessary testing in preparation for the

[3] Sarah Evans et al., 2020 Census Barriers, Attitudes, and Motivators Study (CBAMS) Focus Group Final Report, Version 3.0 (Washington, DC: U.S. Census Bureau, January 24, 2019), https://www2.census.gov/programs-surveys/decennial/2020/program-management/final-analysis-reports/2020-report-cbams-focus-group.pdf.

upcoming census.[4] All of these challenges make a fair and accurate census more difficult to achieve. However, a properly designed integrated partnership and communications campaign that is supported by thorough research, all conducted and created in a timely fashion, can go far to addressing these challenges and helping to achieve a fair and accurate census.

Importance of the partnership program and the media to communicate with the hard-to-count Asian communities

Since the 2000 Census, the census partnership and outreach programs have been critical to achieving more accurate counts for many of our hard-to-count communities than would have otherwise been achieved. In addition to improving accuracy, partnerships with hard-to-count communities reduce non-response follow-up costs. This is achieved through government leaders, school leaders, faith-based leaders, and other community leaders directly communicating with their members about the importance of participating and how the community benefits. Respondents interacting with trusted leaders, rather than with a stranger representing the federal government, are more willing to participate.

In addition to the partnership program, the communications campaign played an important role in reaching hard-to-count communities in the last three decennial censuses. Media is an important tool in communicating with the hard-to-count Asian American communities. In particular, utilizing ethnic media is the most effective way to reach a substantial part of Asian American communities. A 2009 study on ethnic media penetration conducted by New American Media found that ethnic media reaches almost 3 in 4 Asian Americans, with 57 percent reached by ethnic television, 43 percent by ethnic newspapers, and 25 percent by ethnic radio.[5] Not surprisingly, there are differences across various ethnic groups with respect to reliance on ethnic media.

The Census Bureau's communications research should include elements that further explore how communications through partners can be best leveraged and how ethnic media consumption can play a major role in overcoming outreach barriers and changing attitudes and motivations.

Recommendations to Improve Communications Research for the 2030 Census

In order to achieve a successful partnership and communications campaign, thorough research, particularly of those traditionally hardest to count, needs to be conducted. Particularly in light of the current hostile political environment, increasing distrust in

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[4] For example, the Census Bureau drastically reduced its 2026 Census Test in scale and scope. *See* https://www.naco.org/news/census-bureau-cancels-key-rural-test-sites-ahead-2030-count; https://www.congress.gov/crs-product/IN12676; https://thecensusproject.org/2026/03/02/february-2026-census-project-update/ (for discussion of 2026 Census Test).

[5] Bendixen & Associates, et al. The Ethnic Media in America: The Gian Hidden in Plain Sight. Presentation. New York City. June 7, 2005. https://digaai.org/wp/pdfs/ncm_ethnic_midia_presentation.pdf.

government institutions, and concerns about privacy protections, research must be conducted to best understand current concerns and attitudes to participating in the 2030 Census. While there are fundamental, underlying concerns census to census, there are also new realities that influence people's perceptions and willingness to participate in a government program or activity. Building upon previous research -- such as the focus groups conducted prior to the 2020 Census -- is smart, but more can be done to maximize the utility of census communications research.

Restore the Census Barriers, Attitudes and Motivators Study Survey

In the Federal Register Notice itself, the Census Bureau states that their objective involves "replicating and expanding on the successful Census Barriers, Attitudes and Motivators Study (CBAMS) Survey conducted to inform the 2010 and 2020 Censuses." While we are encouraged by this stated goal, the implementation leaves much to be desired. Interviews of 50 individuals does not "replicate or expand" on the CBAMS findings. Earlier in this decade a 2023 CBAMS was conducted with the promise of additional CBAMS being conducted in odd years through 2030. This survey of 7,300 respondents provided insights into Census attitudes post-2020 Census.[6] **The Census Bureau should at a minimum conduct CBAMS two years before the 2030 Census to inform their communications plans, or better yet, revert to the Bureau's original plans to conduct CBAMS every odd year until 2030.**

Language Support

Oversampling would help address one of the challenges in surveying Asian Americans (the relatively smaller size of the community compared to the overall population). However, it does not address a number of other major challenges – the cultural and linguistic diversity of the community.

Despite being viewed as homogenous, Asian Americans represent more than 23 countries in East and Southeast Asia and the Indian subcontinent, that differ dramatically across historical, cultural, linguistic and other characteristics. Each country also represents many different cultures, dialects and unique characteristics. According to the last census, the Chinese population was the largest subgroup, with Asian Indians and Filipinos the next two largest subgroups.[7] However, it is important to note that the fastest growing communities were often the smaller subgroups, such as the Nepalese, Burmese, and Bhutanese who were the fastest growing Asian groups during the last census.[8]

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[6] Trejo, Yazmin A. et al. Studying Public Opinion Attitudes Towards the 2030 Census: 2023 Census Barriers, Attitudes, and Motivators Study (CBAMS). US. Census Bureau. https://www.census.gov/content/dam/Census/newsroom/press-kits/2024/aapor/aapor2024-presentation-cbams.pdf.

[7] U.S. Census Bureau. Asian Indian Was the Largest Asian Alone Population Group in 2020. September 21, 2023. https://www.census.gov/library/stories/2023/09/2020-census-dhc-a-asian-population.html.

[8] Id.

The needs of those speaking a language other than English are rapidly increasing as the community continues to grow. Today, over 15.2 million Asian Americans speak a language other than English at home, representing 70 percent of the overall Asian American population five years and older.[9] Over 5.9 million Asian Americans are limited-English proficient, that is, speaks English less than very well. This represents over 28 percent of the overall Asian American population five years and older and 39 percent of the portion of the population that speaks a language other than English at home. Of course, due to the diversity of Asian American populations, language ability varies across different subgroups. The following detailed groups have higher LEP rates than the average for Asian Americans: Burmese (54%), Vietnamese (46%), Bangladeshi (44%), Chinese (40%), Thai (40%), Nepalese (39%), Korean (36%), Cambodian (36%), and Laotian (35%).[10] On the other hand, Asian Indian (17%), Sri Lankan (19%), Filipino (20%), Pakistani (22%) and Japanese (22%) have lower rates of limited English proficiency compared to the average for Asian Americans.

As the data indicates, language assistance and support by the Census Bureau will be critical to engaging Asian Americans for the upcoming census. We have seen challenges with effectively engaging with all segments of our communities in past censuses. Often times, the research as well as the campaigns themselves targeted Asian American groups with the highest number of LEP individuals, but did not also target the smaller ethnic groups who have the highest LEP rates and the highest percentage of households in which no person age 14 or older either speaks only English at home or speaks a non-English language and speaks English "very well". With limited budgets the advertising campaigns failed to cover an adequate number of Asian languages and cultures, and the advertising agencies at the time were forced to make generalizations based on sometimes inadequate research.

In order to best reach these communities, the overall research agenda must address the cultural and linguistic factors facing Asian Americans. **To that end, we suggest that any communications research survey or program be offered in several Asian languages (ideally for at least the languages that will be supported by the Census Bureau through translated questionnaires).**

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[9] U.S. Census Bureau, "Nativity by Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over (Asian Alone)," American Community Survey, ACS 1-Year Estimates Detailed Tables, Table B16005D, accessed on November 3, 2026, https://data.census.gov/table/ACSDT1Y2025.B16005D?t=Asian:Language+Spoken+at+Home.

[10] U.S. Census Bureau, "Selected Population Profile in the United States," American Community Survey, ACS 1-Year Estimates Selected Population Profiles, Table S0201, accessed on November 3, 2026, https://data.census.gov/table/ACSSPP1Y2025.S0201?t=-04:Language+Spoken+at+Home.

Focus Groups

Additionally, the Census Bureau should conduct focus groups (or other comparable research methodologies) that would allow the Bureau to drill down for smaller populations within the Asian American communities that have great needs, as well as perhaps those who do not have internet access. Focus groups will also provide an opportunity to study community dynamics and interactions that the proposed in-person qualitative interviews in the Federal Register Notice would not be able to provide insights for. As noted above, many of the fastest growing Asian American subgroups and the ones with the highest levels of limited English proficiency are smaller subgroups that are often left out of research and polling. It will be important to be able to speak to these communities in a way that effectively reaches them, and proper research is needed to achieve this. The focus groups are also a necessary step to inform the creation of questions or selection of topics for any following qualitative interviews or quantitative surveys, including the proposed 50 interviews in this Federal Register Notice.

Conclusion

Thank you for this opportunity to comment and make recommendations on the Qualitative Research to Improve 2030 Census Communications Federal Register Notice as the Census Bureau strives to count everyone once and in the right place, meet the urgent needs of communities, and strengthen public trust and participation in census surveys. The research on people's attitudes, behaviors and motivators with respect to the upcoming census is critical to developing an effective and integrated partnership and communications campaign that will help reduce the differential undercount and help reduce the cost through effective messaging that encourages participation by those hardest to count. If you have any questions, please feel free to contact me at tminnis@advancingjustice-aajc.org or (202) 296-2300 x0127.

Sincerely,



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