

March 19, 2019

The Honorable Steven Dillingham
Director
U.S. Census Bureau

Re: Questionnaire Assistance Centers for the 2020 Census – Stakeholder Recommendations

Dear Director Dillingham,

The undersigned census stakeholder organizations believe that a robust program of Questionnaire Assistance Centers (QACs) is crucial to provide an effective on-the-ground presence for the 2020 Census in local communities in order to raise public awareness, deliver trustworthy information, and provide options for self-respondents to receive questionnaire assistance.¹ Consequently, local QACs will be an essential complement to phone-based Census Questionnaire Assistance and other partnership and communications activities in pursuit of a complete count.

We encourage the Census Bureau to promptly consult with stakeholders in developing a plan for QACs for the 2020 Census, and we respectfully offer the following initial recommendations:

1. The overall scale of the QAC program in 2020 should be at least as large as in 2010.
2. The Census Bureau should open, manage, and staff local QACs.
3. QACs should target geographic and demographic communities at risk of being undercounted.
4. QACs should respond to the key issues affecting response in 2020.
5. QACs should be open through the self-response operation.
6. The Census Bureau should develop national guidelines for the locations of QACs.
7. QAC locations should prioritize public access and use.

1. The overall scale of the QAC program in 2020 should be at least as large as in 2010.

We encourage the Census Bureau to plan and operate a network of QACs for the 2020 Census at an overall scale at least as large as the operation for the 2010 Census.² While the 2020 operation should not replicate every aspect of the 2010 operation (see other recommendations below), for

¹ See H. Rept. 116-9 (2019), at 611 (directing the Census Bureau to “devote funding to ... open local questionnaire assistance centers in hard-to-count communities” in the 2020 Census).

² See letter from the Census Project, et al., to Chairman Shelby, Ranking Member Leahy, Chairman Frelinghuysen, and Ranking Member Lowey (Nov. 28, 2018), at 2, *available at* <https://censusproject.files.wordpress.com/2018/11/cplettertohouseandsenaterfy2019census11-28-18.pdf>.

reference to the overall scale, the 2010 operation had 38,827 total sites³ and total operational spending of \$35,574,131.⁴

2. The Census Bureau should open, manage, and staff local QACs.

We encourage the Census Bureau to use QACs to communicate in-person with the public in order to address barriers or motivators to self-response and promote complete self-response that includes all members of a household. While phone-based Census Questionnaire Assistance is a convenient option for some respondents, local QACs will continue to serve an important and distinct role in public outreach. Similarly, although other forms of unstaffed community presence (such as distributing informational materials, unstaffed kiosks, etc.) can be useful, they do not serve the same function as staffed QACs where trained Census Bureau personnel can provide direct assistance with self-response. Therefore, we believe that local QACs should be staffed by sworn Census Bureau employees to provide face-to-face assistance and outreach in communities across the country. However, the Census Bureau should consider supplementing Census Bureau staffing of QACs with volunteers trained and managed by the Census Bureau or Complete Count Committees.

3. QACs should target geographic and demographic communities at risk of being undercounted.

The Census Bureau should target hard-to-count communities in the placement of QACs and the messages and training provided to QAC staff. We encourage the Census Bureau to consider factors related to geography (e.g., as indicated by low projected self-response rate by Census tract; including both rural and urban areas), as well as demographic characteristics and situational factors that can contribute to an undercount (e.g. children under age 5, people experiencing homelessness, complex families, limited English proficiency, etc.).

4. QACs should respond to the key issues and opportunities affecting response in 2020.

New factors in 2020 include new self-response options, reduced Census Bureau field presence and community visibility, increased levels of public distrust in government, potential impact of the citizenship question, and new concerns about the potential spread of misinformation or disinformation. QACs can help address these issues and enable the public to immediately self-respond online, which will be particularly helpful to people who lack home Internet access or

³ Geoff Jackson, Keith Wechter, and Susanna Winder, “2010 Census Be Counted and Questionnaire Assistance Centers Assessment,” U.S. Census Bureau (May 22, 2012), at xiii, *available at* <https://www2.census.gov/programs-surveys/decennial/2010/program-management/5-review/cpex/2010-memo-194.pdf> (total number consisting of 29,157 staffed Questionnaire Assistance Center sites and 9,670 unstaffed Be Counted sites).

⁴ *Id.* (in 2010 dollars, not inflation adjusted).

digital skills. Training and messages provided to QAC staff should speak to these issues and should be informed by messaging research and coordinated with the Bureau's other partnership and communications activities. To the greatest extent possible, staff recruitment and training should include cultural competency and other skills that facilitate communication with hard-to-count communities in the local area, such as people who speak languages other than English and people with low literacy.

5. QACs should be open through the self-response operation.

QACs should be open from the beginning of self-response, starting no later than initial mailings and drop-offs (March 12-20, 2020, depending on area). To most effectively use resources, there should be flexibility to adjust QAC sites and hours of staffing over the course of the operation, with the greatest availability focused on the period of highest expected use, which we anticipate to be approximately the four-week period from the beginning of self-response. It will likely be useful to continue QACs, possibly at a smaller number of sites or staffing hours, until the beginning of Non-Response Follow-Up.

6. The Census Bureau should develop national guidelines for the locations of QACs.

The Census Bureau should develop national criteria or guidelines for the locations of QACs. Reflecting the multifaceted purpose of QACs, development of the guidelines should include consultation among staff from the Integrated Partnership and Communications, Field Operations, and Decennial Census programs. Stakeholders and Census Bureau teams focused on potential undercount issues (such as the 2020 Census Undercount of Young Children Task Force) also should be invited to provide input. Where possible, the Census Bureau should consider leveraging national partnerships in order to facilitate the selection and deployment of QAC sites.

7. QAC locations should prioritize public access and use.

In planning for QACs, the Census Bureau should prioritize locations and hours that maximize public access and use. We encourage the Census Bureau to establish keystone sites in locations conveniently accessible to the general public, including people with disabilities, in areas targeted to reach hard-to-count communities (as discussed above).⁵ Keystone sites should be staffed at regular schedules during high-usage hours of the facility, which should not be limited to 15 hours per site (as it was in 2010).⁶ To the greatest extent possible, these keystone sites should be located in places that have high public utilization on evenings and weekends and should be open

⁵ See, e.g., letter from the American Library Association to Director Dillingham (Feb. 22, 2019), available at <http://www.ala.org/advocacy/sites/ala.org.advocacy/files/content/govinfo/Sign-ons/2020CensusQuestionnaireAssistanceCenters2-22-19.pdf>.

⁶ Jackson, Wechter, and Winder, *supra* note 3, at 8.

during those hours. Keystone sites should be supplemented with additional QAC sites that may have more targeted hours in a given location or may be mobile locations to enhance outreach in hard-to-count communities (e.g., Sunday hours in a church, a mobile site in a downtown square or college campus, a mobile site in a rural or remote community, etc.).

In determining where to open local QACs, the Census Bureau should consult with local officials and Complete Count Committees to identify the most effective sites. To drive utilization, the Census Bureau should publicize QAC locations as a resource for community members who have questions or need assistance as an option alongside other Bureau resources.

Conclusion

Thank you for your consideration. We would welcome the opportunity to discuss these ideas with you further. If we can provide additional information, please contact Gavin Baker at gbaker@alawash.org or (202) 628-8410.

Sincerely,

National organizations

American-Arab Anti-Discrimination Committee (ADC)

American Library Association

Asian Americans Advancing Justice

Asian and Pacific Islander American Vote (APIA Vote)

Asian Pacific American Labor Alliance (APALA)

Association for Rural & Small Libraries

Association of Population Centers

Chief Officers of State Library Agencies

Child Care Aware[®] of America

Children's Advocacy Institute

Coalition for Humane Immigrant Rights (CHIRLA)

Color Of Change

Common Cause

The Leadership Conference on Civil and Human Rights

Multicultural Council of America

NAACP

NAACP Legal Defense & Educational Fund, Inc.

NALEO Educational Fund

National Asian Pacific American Women's Forum (NAPAWF)

National Association of Regional Councils

National Coalition for Asian Pacific American Community Development (National CAPACD)

National Coalition for Literacy
 National Community Development Association
 National Congress of American Indians
 National Human Services Assembly
 National League of Cities
 National LGBTQ Task Force
 National Urban League
 National WIC Association
 NETWORK Lobby for Catholic Social Justice
 OCA – Asian Pacific American Advocates
 Partnership for America’s Children
 Population Association of America
 ReadyNation
 Shepherding the Next Generation
 Southeast Asia Resource Action Center (SEARAC)
 State Voices
 U.S. Conference of Mayors
 Urban and Regional Information Systems Association (URISA)
 ZERO TO THREE

State and local organizations, businesses, and entities

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| African Community Housing & Development | Washington |
| Agenda for Children | Louisiana |
| Asian American Organizing Project (AAOP) | Minnesota |
| CAIR-WA | Washington |
| California Association of Nonprofits | California |
| California Calls Education Fund | California |
| California State University Libraries | California |
| Center for Governmental Studies at Northern Illinois University | Illinois |
| Center for Public Policy Priorities | Texas |
| Central Washington Justice For Our Neighbors | Washington |
| CHANGE Illinois | Illinois |
| Children’s Defense Fund-New York | New York |
| Children’s Defense Fund-Texas | Texas |
| City of Seattle Immigrant and Refugee Commission | Washington |
| Cleveland Neighborhood Progress | Ohio |
| Colorado Children’s Campaign | Colorado |
| Entre Hermanos | Washington |
| Equality California | California |
| Fair Count | Georgia |

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| Faith Action Network | Washington |
| Forefront | Illinois |
| Hunger Free Vermont | Vermont |
| Indivisible Hawaii | Hawaii |
| Kentucky Youth Advocates | Kentucky |
| Korean Community Service Center | Washington |
| MAPS-AMEN (American Muslim Empowerment Network) | Washington |
| Marion County Commission on Youth (MCCOY) | Indiana |
| Massachusetts Voter Table | Massachusetts |
| Metropolitan Mayors Caucus | Illinois |
| Michigan League for Public Policy | Michigan |
| Michigan Nonprofit Association | Michigan |
| Minnesota Community Action Partnership | Minnesota |
| Mother Africa | Washington |
| Na'ah Illahee Fund | Washington |
| New York Counts 2020 | New York |
| Northwest Kenyan Community Association | Washington |
| Open Access Connections | Minnesota |
| OutFront Minnesota | Minnesota |
| PathWays PA | Pennsylvania |
| Pennsylvania Partnerships for Children | Pennsylvania |
| Proyecto Azteca | Texas |
| Research Advisory Services, Inc. | Arizona |
| Robert W. Rowe Public Library | Illinois |
| Seattle/King County Coalition on Homelessness | Washington |
| Silver State Equality | Nevada |
| Southeast Michigan Census Council | Michigan |
| Tacoma Community House | Washington |
| Tri-Cities LULAC Council #47014 | Washington |
| Virginia Civic Engagement Table | Virginia |
| Washington Nonprofits | Washington |