

**SUPPORTING STATEMENT  
U.S. DEPARTMENT OF COMMERCE  
U.S. CENSUS BUREAU**

**2015 National Content Test  
OFFICE OF MANAGEMENT AND BUDGET (OMB) CONTROL NUMBER 0607-XXXX**

**Part A. Justification**

**1. Necessity of the Information Collection**

During the years preceding the 2020 Census, the Census Bureau will pursue its commitment to reducing the cost of conducting the next decennial census while maintaining the highest data quality possible. A primary decennial census cost driver is the collection of data from members of the public for which the Census Bureau received no reply via initially offered response options. We refer to these cases as nonrespondents. Increasing the number of people who take advantage of self response options (such as completing a paper questionnaire and mailing it back to the Census Bureau, or responding via telephone or Internet alternatives) can contribute to a less costly census.

The 2015 National Content Test (NCT) is part of the research and development cycle leading up to the 2020 Census.

The first objective of this test is to evaluate and compare different versions of questions about such things as race and Hispanic origin, relationship, and within-household coverage. The 2015 NCT is the primary mid-decade opportunity to compare different versions of questions prior to making final decisions for the 2020 Census. The test will include a reinterview to further assess the accuracy and reliability of the question alternatives about race and origin and within-household coverage.

For the decennial census, the Census Bureau adheres to the U.S. Office of Management and Budget's (OMB) October 30, 1997 "Revisions to the Standards for the Classification of Federal Data on Race and Ethnicity" (see [www.whitehouse.gov/omb/fedreg\\_1997standards](http://www.whitehouse.gov/omb/fedreg_1997standards)) for classifying racial and ethnic responses. There are five broad categories for data on race: "White," "Black or African American," "American Indian or Alaska Native," "Asian," and "Native Hawaiian or Other Pacific Islander." There are two broad categories for data on ethnicity: "Hispanic or Latino" and "Not Hispanic or Latino." The OMB standards advise that respondents shall be offered the option of selecting one or more racial designations. The OMB standards also advise that race and ethnicity are two distinct concepts; therefore, Hispanics or Latinos may be of any race.

Additionally, the 1997 OMB standards permit the collection of more detailed information on population groups, provided that any additional groups can be aggregated into the standard broad set of categories. Currently, the Census Bureau collects additional detailed information on Hispanic or Latino groups, American Indian and Alaska Native tribes, Asian groups, and Native Hawaiian and Other Pacific Islander groups.

For example, responses to the race question such as Navajo Nation, Nome Eskimo Community, and Mayan are collected and tabulated separately in Census Bureau censuses and surveys, but also are aggregated and tabulated into the total American Indian or Alaska Native population. Similarly, responses to the race question such as Chinese, Asian, Indian, and Vietnamese are collected and tabulated separately, but also aggregated and tabulated into the total Asian population, while responses such as Native Hawaiian, Chamorro, or Fijian are collected and tabulated separately, but also tabulated, and aggregated into the total Native Hawaiian or Other Pacific Islander population. Responses to the ethnicity question such as Mexican, Puerto Rican, and Cuban are collected and tabulated separately, but also are tabulated and aggregated in Census Bureau censuses and surveys, but also tabulated and aggregated into the total Hispanic or Latino population.

The 2015 NCT will test ways to collect and tabulate detailed information for the detailed groups, not just to the broad groups identified above. Detailed data for specific White population groups, such as German, Irish, and Polish, and Black population groups, such as African American, Jamaican, and Nigerian, will be collected and tabulated, and may be aggregated into the total “White” or “Black or African American” populations respectively.

The 2015 NCT also includes testing of a separate “Middle Eastern or North African” (MENA) category and the collection of data on detailed MENA groups, such as Lebanese, Egyptian, and Iranian. Currently, following the 1997 OMB standards, Middle Eastern and North African responses are classified under the White racial category, per OMB’s definition of “White.”

The second objective of the NCT is to test different contact strategies for optimizing self-response. The Census Bureau has committed to using the Internet as a primary response option in the 2020 Census. The 2015 NCT includes nine different approaches to encouraging households to respond and, specifically, to respond using the less costly and more efficient Internet response option. These approaches include altering the timing of the first reminder, use of email as a reminder, altering the timing for sending the mail questionnaire, use of a third reminder, and sending a reminder letter in place of a paper questionnaire to non-respondents.

One benefit of the Internet response mode is that it allows for more functionality and greater flexibility in designing questions compared to paper, which is constrained by space availability. The 2015 NCT will utilize web-based technology, such as the Internet, smart phones, and tablets to improve question designs, and to optimize reporting of detailed racial and ethnic groups (e.g., Samoan, Iranian, Blackfeet Tribe, Filipino, Jamaican, Puerto Rican, Irish, etc.).

Web-based designs also provide much more utility and flexibility for using detailed checkboxes and write-in spaces to elicit and collect data for detailed groups than traditional paper questionnaires, and will help collect data for both the broader OMB categories, as well as more detailed responses across all groups.

## **Components of the Test**

### **Race and Origin Content**

The 2015 NCT builds on extensive research previously conducted by the Census Bureau as part of the 2010 Census. One major study was the 2010 Census Race and Hispanic Origin

Alternative Questionnaire Experiment (AQE) (for details, see [www.census.gov/2010census/news/press-kits/aqe/aqe.html](http://www.census.gov/2010census/news/press-kits/aqe/aqe.html)). The 2010 AQE examined alternative strategies for improving the collection of data on a race and Hispanic origin, with four goals in mind:

1. Increasing reporting in the standard race and ethnic categories as defined by the U.S. Office of Management and Budget;
2. Decreasing item non-response for these questions;
3. Increasing the accuracy and reliability of the results for this question; and
4. Eliciting detailed responses for all racial and ethnic communities (e.g., Chinese, Mexican, Jamaican, etc.).

Some of the findings from this research include:

- Combining race and ethnicity into one question did not change the proportion of people who reported as Hispanics, Blacks, Asians, American Indians and Alaska Natives, or Native Hawaiians and Other Pacific Islanders.
- The combined question yielded higher item response rates, compared with separate question approaches.
- The combined question increased reporting of detailed responses for most groups, but decreased reporting for others.

The successful strategies from the AQE research have been employed in the design of the Census Bureau's 2020 Census research. Four key dimensions of the questions on race and

Hispanic origin are being tested in the 2015 NCT. These include question format, response categories, wording of the instructions, and question terminology.

## **Question Format**

The 2015 NCT will evaluate the use of two alternative question approaches for collecting detailed data on race and ethnicity. One approach uses two separate questions: the first about Hispanic origin, and the second about race. The other approach combines the two items into one question about race and origin. The 2015 NCT research will test both approaches with new data collection methods, including Internet, telephone, and in-person response. Each approach is described below, with its associated data collection modes.

### **1. *Separate race and origin questions (paper and Internet)***

This is a modified version of the race and Hispanic origin approach used in the 2010 Census. Updates since the 2010 Census include added write-in spaces and examples for the White response category and the Black or African American response category, removal of the term “Negro,” and the addition of an instruction to allow for multiple responses in the Hispanic origin question.

### **2. *Combined question with checkboxes and write-ins visible at same time (paper)***

This is a modified version of the combined question approaches found to be successful in the 2010 AQE research. Checkboxes are provided for the U.S. Office of Management and Budget (OMB) broad categories (per the 1997 Standards for the Classification of Federal Data on Race and Ethnicity), with a corresponding write-in space for detailed response to each checkbox category. In this version, all checkboxes and write-in spaces are visible at all times. Each

response category contains six example groups, which represent the diversity of the geographic definitions of the OMB category. For instance, the Asian category examples of Chinese, Filipino, Asian, Indian, Vietnamese, Korean, and Japanese represent the six largest detailed Asian groups in the United States, reflecting OMB's definition of Asian (“A person having origins in any of the original peoples of the Far East, Southeast Asia, and the Indian subcontinent.”). Respondents do not have to select an OMB checkbox, but may enter a detailed response in the write-in space without checking a category.

### **3. *Combined question with major checkboxes, detailed checkboxes, and write-ins (paper)***

This is a modified version of the combined question approaches found to be successful in the 2010 AQE. Checkboxes are provided for the OMB categories, along with a series of detailed checkboxes under each major category, and a corresponding write-in space and examples to elicit and collect all other detailed responses within the major category. In this version, all checkboxes and write-in spaces are visible at all times. Again, the detailed response categories represent the diversity of the geographic definitions of the OMB category.

For instance, under the Asian category (and major checkbox), a series of detailed checkboxes is presented for Chinese, Filipino, Asian Indian, Vietnamese, Korean, and Japanese, which represent the six largest detailed Asian groups in the United States. Then, instructions to enter additional detailed groups (with the examples of “Pakistani, Thai, Hmong, etc.”) precede a dedicated write-in area to collect other detailed responses. Again, these detailed groups reflect OMB's definition of Asian (“A person having origins in any of the original peoples of the Far

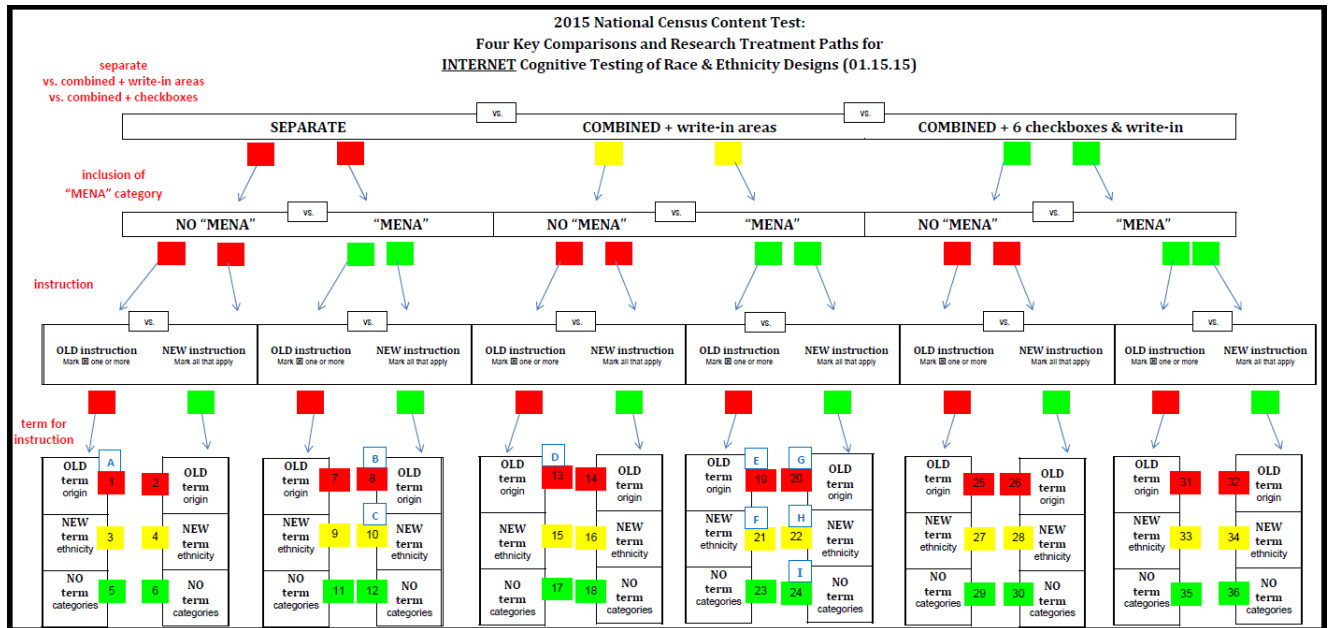
East, Southeast Asia, and the Indian subcontinent.”). Respondents do not have to select an OMB checkbox, but may enter a detailed response in the write-in space without checking a category.

#### **4. *Combined question with major checkboxes and write-ins on separate screens (Internet)***

In this version, the detailed origin groups are solicited on subsequent screens after the OMB response categories have been selected. On the first screen, the OMB checkbox categories are shown along with their six representative example groups. Once the OMB categories have been selected, one at a time, subsequent screens solicit further detail for each category that was chosen (e.g., Asian), using a write-in space, with examples, to collect the detailed groups (e.g., Korean and Japanese). The intent is to separate mouse click tasks (checkbox categories) and typing tasks (write-ins) in an attempt to elicit responses that are more detailed. This approach was used as one of three race and origin Internet panels in the 2014 Census Test.

#### **5. *Combined question branching with detailed checkbox screens (Internet)***

This version is an alternative method of soliciting detailed origin groups using separate screens, detailed checkboxes, and write-in spaces. On the first screen, the OMB checkbox categories are shown along with their six representative example groups. Once the OMB categories have been selected, one at a time, subsequent screens solicit further detail for each category, this time using a series of additional checkboxes for the six largest detailed groups (e.g., Chinese, Filipino, Asian, Indian, Vietnamese, Korean, and Japanese) with a write-in space also provided to collect additional groups.



## Race Response Categories

The 2015 NCT will also evaluate the use of a “Middle Eastern or North African” (“MENA”) response category. There will be two treatments for testing this dimension:

- Use of a MENA category:** This treatment tests the addition of a MENA checkbox category to the race question. The MENA category is placed within the current category lineup, based on estimates of population size, between the category for American Indians and Alaska Natives and the category for Native Hawaiians and Other Pacific Islanders. With the addition of this new category, the “White” example groups are revised. The Middle Eastern and North African examples of Lebanese and Egyptian are replaced with the European examples of Polish and French. The MENA checkbox category will have the examples of Lebanese, Iranian, Egyptian, Syrian, Moroccan, and Algerian. All other checkbox categories and write-in spaces remain the same.

2. **No separate MENA category:** This treatment tests approaches without a separate MENA checkbox category, and represents the current OMB definition of White (“A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.”). Here the category will provide examples of Middle Eastern and North African origins (e.g., Lebanese; Egyptian) along with examples of European origins (e.g., German; Irish) as part of the “White” racial category.

### **Wording of the Instructions**

The 2015 NCT will evaluate the use of different approaches for wording the instructions used to collect data on race and ethnicity. The 2010 AQE research found that respondents frequently overlook the instruction to “*Mark [X] one or more boxes*” and have difficulty understanding the instructions. From the 2010 AQE qualitative research we learned that some respondents stop reading the instruction after noticing the visual cue [X] and proceed directly to do just that – *mark a box* – overlooking the remainder of the instruction. The new instruction being tested in the 2015 NCT (“*Mark all boxes that apply*”) is an attempt to improve the clarity of the question and make it more apparent that more than one group may be selected. The following options will be tested in the 2015 NCT.

1. “**Mark [X] one or more**”: One version (old instructions) will advise respondents to, “*Mark [X] one or more boxes AND print [origins/ethnicities/details].*”

2. ***“Mark all that apply”***: An alternative version (new instructions), will advise respondents to, *“Mark all boxes that apply AND print [origins/ethnicities/details] in the spaces below. Note, you may report more than one group.”*

### **Instructions for American Indian and Alaska Native (AIAN) Write-In Area**

The 2015 NCT will also examine different instructions to optimize detailed reporting within the AIAN write-in area. From the 2010 AQE research and recent 2014 qualitative research that the Census Bureau conducted with American Indians, Alaska Natives, and Central and South American Indian respondents, we know the instruction to *“Print enrolled or principal tribe”* causes confusion for many AIAN respondents and means different things to different people. The research found that AIAN respondents were confused by the use of different terms and concepts (e.g., “enrolled”, “affiliated,” “villages,” “race,” “origin,” “tribe,” etc.) and there was disagreement among focus group participants as to what “affiliated tribe” or “enrolled” or “villages” meant.

The overwhelming sentiment from 2014 AIAN focus group participants was that they want to be treated equally with other race/ethnic groups, and this was accomplished by not using different terminology (i.e., enrolled, affiliated, villages, etc.). Asking *“What is your race or origin?”* in conjunction with *“Print, for example,...”* (along with AIAN example groups) allowed the respondents to understand what the question asked them to report (their race or origin) and did not limit their write-in response by confounding the instructions with terms that mean different things to different people (e.g., tribes, villages, etc.). Therefore, the instruction to, *“Print, for example,...”* presented a viable alternative for further exploration in 2015 NCT research.

Based on the findings and recommendations from this research, the 2015 NCT will test variations of the instructions for the AIAN write-in area. We plan to test the instruction, "*Print enrolled or principal tribe, for example...*" on control versions, and the instruction, "*Print, for example...*" on experimental versions, to see how they perform.

## **Question Terms**

The 2015 NCT will evaluate the use of different conceptual terms (e.g., origin, ethnicity, or no terms) in the wording of questions for collecting data on race and ethnicity. Recent qualitative focus groups and qualitative research (e.g., 2010 AQE research; 2013 Census Test research; cognitive pre-testing for the 2016 American Community Survey (ACS) Content Test) found that the terms “race,” “ethnicity,” and “origin” are confusing or misleading to many respondents, and mean different things to different people. The 2010 AQE research tested the removal of the term “race” from the question, and showed no evidence that removal of the term had any effect on either unit or item response rates. Recent cognitive research for the 2016 ACS Content Test tested an open-ended instruction (“*Which categories describe you?*”) and found that respondents did not have issues with understanding what the question was asking. The following options will be tested in the 2015 NCT.

1. **“Origin” term:** The current version of the race and Hispanic origin questions, and the combined question, use the terms “race” and/or “origin” to describe the concepts and groups in the question stem and/or instructions. For instance, in the combined race and Hispanic origin approach, the question stem is “*What is Person 1’s race or origin?*”

2. **“Ethnicity” term:** One alternative option being explored tests the use of both the terms “ethnicity” along with “race” in the question stem and/or instructions (e.g., “*What is Person 1’s race or ethnicity?*”).

3. **NO terms:** A second alternative option being explored tests the removal of the terms “race,” “origin,” and “ethnicity” from the question stem and instructions. Instead, a general approach asks, “*Which categories describe Person 1?*”

### **Relationship Content**

Two versions of the relationship question will be tested. Both versions are the same as those used in a split-sample in the 2014 Census Test, with no changes. These relationship categories were previously tested in other Census Bureau surveys including the American Housing Survey, American Community Survey, and the Survey of Income and Program Participation (currently used in production). Although research to date has been informative, leading to the development of the revised relationship question, additional quantitative testing is needed. Because the incidence of some household relationships—such as same-sex couples—is relatively low in the general population, the revised question needs to be tested with large, nationally representative samples prior to a final decision to include them in the 2020 Census questionnaire.

The first version uses the 2010 Census relationship question response options, but in a new order, starting with “husband or wife” and then the “unmarried partner” category. This version also re-introduces the foster child category, which was removed from the 2010 Census form due to space issues.

The second version includes the same basic response options as the 2010 Census version, but modifies/expands the “husband or wife” and “unmarried partner” categories to distinguish between same-sex and opposite-sex relationships.

### **Coverage Content (Internet Only)**

The 2012 NCT experimented with several methods to improve within-household coverage for Internet respondents. One benefit of the online response mode is that it allows for more functionality and greater flexibility in designing questions compared to paper, which is constrained by space availability. The 2012 NCT included a coverage follow-up reinterview to evaluate the different Internet design options, but some results were inconclusive. In the 2015 NCT, two designs will be tested to compare different approaches for helping respondents provide a more accurate roster of household residents.

The first approach is the “Rules-Based” approach, and will allow us to see whether the presence of a question asking the number of people in the household, along with the residence rule instructions, helps respondents create an accurate roster. This is similar to the approach used across all modes in Census 2000 and the 2010 Census, where the respondent was expected to understand various applications of our residence rules and apply them to their household. The roster creation is followed by a household-level question that probes to determine if any additional people not listed originally should be included for consideration as residents of the household (several types of people and living situations are shown in a list).

The “Question-Based” approach allows us to ask guided questions to help improve resident responses. Respondents are not shown the residence rule instructions and are only asked to create an initial roster of people they consider to be living or staying at their address on Census Day. This is followed by several short household-level questions about types of people and living situations that might apply to people in the household that were not listed originally.

The materials mailed to the respondents will inform them that the survey is mandatory in accordance with Title 13, United States Code, Sections 141 and 193. This information also will be available via a hyperlink from within the Internet Instrument.

## **2. Needs and Uses**

The results of the 2015 NCT will help guide the design of additional 2020 Census testing later this decade. The 2015 NCT will be the only opportunity to test content with a nationally representative sample prior to the 2020 Census. Testing in 2015 is necessary to establish recommendations for contact strategies, response options, and content options that can be further refined and tested in later tests. At this point in the decade, the Census Bureau needs to acquire evidence showing whether the strategies being tested can reduce the cost per housing unit during a decennial census, while providing high quality and accuracy of the census data. The nationally-representative sample is designed to ensure that the unbiased estimates from this test accurately reflect the nation as a whole, across a variety of demographic characteristics.

Along with other results, the response rates to paper and Internet collection will be used to help

inform 2020 Decennial program planning and cost estimation metrics values. In addition, several demographic questions and coverage probes are included in this test to achieve improved coverage by future decennial censuses and surveys.

Information quality is an integral part of the pre-dissemination review of the information disseminated by the Census Bureau (fully described in the Census Bureau's Information Quality Guidelines). Information quality is also integral to the information collections conducted by the Census Bureau and is incorporated into the clearance process required by the Paperwork Reduction Act.

### **3. Use of Information Technology**

The 2015 NCT will use the Internet, telephone centers, and email to collect data and/or communicate with respondents. Respondents will have the option to respond to this test via the Internet (on various devices, e.g., computers, tablets, smart phones) or through telephone questionnaire assistance (TQA) using a toll-free number and speaking with an operator. For both Internet and TQA modes, the Census Bureau will continue its efforts to make it easier to respond by allowing respondents to do so without providing the pre-assigned Census Bureau User Identification (ID) number associated with their address. For any of these “Non-ID” responses, the Census Bureau will conduct daily batch processing in an attempt to search for the address in the Master Address File (MAF) to determine if it matches an existing MAF record. In all instances where a MAF match is not found, an automated process will attempt to assign the respondent address to a census block. Data from the address matching and geocoding results will be included in the results reported for the Test.

### **4. Efforts to Identify Duplication**

This evaluation is an effort unique to the Census Bureau; therefore, duplicate information is not being collected by any other agency. The Census Bureau is testing new methods that have not previously been examined or used in a decennial census.

The Census Bureau is utilizing results and information from other Census Bureau surveys when possible. Current Internet data collection information from the ACS operations will be useful in defining future reminder contact strategies. The Census Bureau is also working with other countries with similar contact strategies. The 2020 Research and Testing Program also is

conducting additional literature reviews on results seen in other surveys about paradata, nonresponse follow-up procedures, fieldwork efficiencies, telephone contacts, Internet response, and geographic differences.

2015 NCT testing of modified race and Hispanic origin questions will also be conducted in collaboration with the American Community Survey's 2016 Content Test. The ACS 2016 Content Test will allow analysis of responses collected through interviewer-administered modes, as well as an examination of the race and Hispanic origin responses by the other socioeconomic characteristics collected in the ACS. Results from the 2015 NCT and the ACS 2016 Content Test will be used together in determining recommended versions of the race and Hispanic origin questions for the 2020 Census and the ACS.

## **5. Minimizing Burden**

The collection of data is only for households and individuals and should have no effect on small business. To reduce burden on particular respondents, any housing units selected for the 2015 ACS will be excluded from sample selection for this test.

## **6. Consequences of Less Frequent Collection**

If this collection of information did not occur, the Census Bureau would lack some of the key quantitative evidence needed to improve upon the current decennial census design, and would risk failing to identify all cost savings for the 2020 Census. Because it is a nationally representative sample, the 2015 NCT will be our primary source for content testing for the 2020 Census and estimating response rates by mode.

In fiscal year 2016, we will analyze the results of the 2015 Test and discuss the findings with stakeholders and external advisors. This will feed into our work as we prepare to make recommendations to OMB. By April 2017, the 2020 Census topics must be submitted to Congress, with the final 2020 Census question wording due to Congress by April 2018.

The frequency cannot be decreased as this is a one-time data collection.

## **7. Special Circumstances**

No special circumstances exist.

## **8. Consultations outside the Agency**

The Census Bureau consulted with a variety of data users including, but not limited to, academics, national researchers, community and organizational leaders, and the Census Bureau's Advisory Committees. As part of our ongoing research efforts for race and ethnicity, the Census Bureau plans to continue our outreach discussions and dialogue with myriad racial and ethnic community stakeholders, leaders, expert scholars, and advisors. These important interactions have been, and will continue to be paramount in our efforts to prepare for the 2020 Census. Our collaboration with the Census Bureau's National Advisory Committee on Racial, Ethnic, and Other Populations, in particular, has been an integral part of our work and will benefit the Census Bureau in our next steps of planning for the 2020 Census. Over the past year, our research team met with members of our National Advisory Committee to discuss our race and ethnicity

research and future plans, and they encouraged us to continue our research on both the separate and combined questions, alternative question wording, instructions, terminology, and the testing of a distinct category for respondents of Middle Eastern, North African, and Arab heritage. Additionally, in 2014, the U.S. Office of Management and Budget (OMB) created a federal interagency working group on race and ethnicity research issues. The group is comprised of key federal statistical agencies, including the Census Bureau, National Center for Education Statistics, National Center for Health Statistics, Bureau of Justice Statistics, and Bureau of Labor Statistics.

Additionally, the Census Bureau met with the Arab American Institute and leading Middle Eastern and Arab American scholars, activists, and organizations about their request for a separate classification and MENA category. The Census Bureau met with members of the National Council of Asian and Pacific Americans to discuss ways in which to collect important disaggregated data for detailed Asian and Pacific Islander groups. The Census Bureau met with leaders and research experts in the Latino community at a national summit sponsored by the National Association of Latino Elected and Appointed Officials to discuss AQE findings, race reporting among Hispanics, and ways to improve data on race and ethnicity. The Census Bureau met with a broad national coalition of researchers and civil rights experts to discuss the topic of race, ethnicity, and civil rights at a forum sponsored by the Leadership Conference on Civil & Human Rights. The Census Bureau also met with researchers and leaders in the Afro Latino community to take part in discussions on the importance of race and ethnic data and identity for the Afro-Latino population.

Cognitive testing participants will be recruited from outside the Census Bureau to provide their views on the content and wording of questionnaire items prior to inclusion in the 2015 NCT. This includes cognitive testing of the Internet questionnaire and the bilingual paper questionnaire, and expert review of the Spanish Internet instrument, including race and Hispanic origin questions. In addition, usability participants recruited from outside the Census Bureau will provide their views on the clarity of instructions and ease of use of the Internet application.

### **Responses to Federal Register Notice Comments**

The notice for public comment, entitled “Proposed Information Collection; Comment Request; 2015 National Content Test” was published in the Federal Register December 2, 2014 (Vol. 79, No. 231, pp. 71377-71381). During the public comment period, the Census Bureau received 4,550 submissions about the testing plans. All but one of the submissions made references to the testing of race and ethnicity, including testing a new category for Middle Eastern or North African respondents. Within the 4,550 submissions, there were 13,116 comments, covering the 58 topics detailed below. The vast majority of the comments focused on testing a Middle Eastern or North African (MENA) category. Additional comments were about other aspects of testing questions on race and ethnicity, as well as relationship, within-household coverage, data collection and contact strategies, sample design, and language assistance. Finally, there were a few comments about topics out of scope for the test, including the use of administrative records, additional demographic questions on gender identity and sexual orientation, cultural competency for field training, and field partnership and outreach.

## **COMMENTS ON TESTING A MIDDLE EASTERN OR NORTH AFRICAN**

### **CATEGORY**

During the public comment period, the Census Bureau received 4,509 submissions related to testing a Middle Eastern or North African (MENA) category, which comprised 12,293 comments covering the 11 topics detailed below.

#### **TOPIC 1: Support for Testing a MENA Category – 4,473 comments**

The majority of submissions received on the Federal Register Notice expressed support for testing a Middle Eastern or North African (MENA) category in the 2015 National Content Test (NCT). The comments (4,472 comments) related both personal and societal reasons for their support. Some respondents of MENA origin stated they were confused about how to respond to the current racial categories, and that the introduction of the MENA category is an improvement. Many comments indicated that accurate data on the MENA population are necessary to inform the community, researchers, and policy-makers to help in health care research, language assistance, educational funding, as well as for civil rights enforcement and the development of anti-discrimination policies. Some mentioned specific ethnic groups within MENA, such as Iranian Americans, who are traditionally undercounted, and that the collection of these data would have a significant impact on the services available to these communities.

The 2015 NCT will evaluate the use of a MENA response category. In designs which include a distinct MENA category, the MENA checkbox category will have the examples of “Lebanese, Iranian, Egyptian, Syrian, Moroccan, Algerian” along with a dedicated write-in space for

collecting detailed MENA responses. The results of the 2015 NCT research will inform recommendations for a MENA category for the 2020 Census.

TOPIC 2: Do Not Support Testing a MENA Category – 15 comments

Fifteen comments did not support testing a MENA category. Many of these comments thought the government should be asking less information about race and ethnicity, and commented that asking for more information is divisive and intrusive. A few stated the proposed MENA category creates another special interest group and is a way for this group to get special funding; others thought it was inappropriate given current world events. One comment stated that Middle Eastern people should be considered White, while North African people should not.

Over the past few years, Census Bureau researchers have met with the leaders and experts from the Arab American Institute, the Arab American Studies Association, and other leading Middle Eastern and Arab American scholars, activists, and organizations about their request for a separate classification and MENA category. The 2015 NCT will evaluate the use of a MENA response category. The results of the 2015 NCT research will inform recommendations for a MENA category for the 2020 Census.

TOPIC 3: MENA as a Racially Diverse Ethnicity – 3,301 comments

A large number of comments (3,301 comments) advised that people from the MENA region identify with many racial backgrounds, but no designation currently exists for them, and they remain undercounted and underrepresented. The comments supported a MENA classification because it would allow people of ethnic groups that are not country-specific to self-identify, such as Assyrians, Chaldeans, Kurds, Berbers, Amazighs, and others.

The overall objective for the 2015 NCT is to test alternative designs of the race and ethnic questions to ascertain the best way to elicit and collect data on race and ethnicity for the 2020 Census. Individuals will be advised that they may report all of the groups that they identify with, including the reporting of multiple races and ethnicities (e.g., MENA and Black; or MENA and White). The results of the 2015 NCT research will inform recommendations for a MENA category for the 2020 Census.

#### TOPIC 4: Classification of Countries or Ethnic Groups as MENA – 737 comments

A large number of comments (737 comments) were concerned with the countries or ethnicities the Census Bureau should classify as MENA. Most stated that MENA should include countries that are in the League of Arab States, as well as Turkey and Iran. Two comments specifically stated that the definition should include Israel, as well as non-country specific groups, such as Berber, Amazighs, and Chaldeans, among others. Two other comments stated the MENA classification should be strictly geographic, and thus should not include members of the League of Arab States that are not part of this geographic region, such as Somalia.

In 2012, the Census Bureau launched a comprehensive research and outreach program, which included consulting with the U.S. Office of Management and Budget (OMB), key federal statistical agencies, professional demographic and sociological associations, academics, race and ethnicity experts, members of the Census Bureau's National Advisory Committee (NAC), and MENA stakeholders on the classification of MENA. These stakeholders have advised the Census Bureau on which nationalities and ethnic groups should be classified as Middle Eastern or North African. We plan to hold an expert forum meeting in the Spring of 2015, seeking feedback on classifying MENA. The Census Bureau plans to test a MENA category in the 2015

NCT. The results of this research will help determine recommendations for a MENA category for the 2020 Census.

TOPIC 5: Disagreement with Classification of MENA as White – 3,727 comments

A large number of the comments (3,727 comments) took issue with the current OMB standards classifying people of Middle Eastern or North African descent as “White.” They stated that this has led to a significant under-count of the MENA population, preventing access to basic services such as language assistance, educational grants, funding for cultural competency training, as well as more effective implementation, monitoring, and enforcement of civil rights protections. In recent years, there has been increasing interest among the public, research agencies, community organizations, and within the Census Bureau itself, to address the issue that many people of Middle Eastern or North African origin do not identify as “White” and often feel that this category does not represent them. Findings from the Census Bureau’s 2010 Alternative Questionnaire Experiment focus group research with Middle Eastern and North African communities illuminated this.

Over the past few years, we have met with the leaders and experts from the Arab American Institute, the Arab American Studies Association, and other leading Middle Eastern and Arab American scholars, activists, and organizations about their request for a separate MENA category. Currently, MENA responses are classified under the White racial category, per OMB’s definition of White. The 2015 NCT will evaluate the use of a MENA response category in the race question. The results of the 2015 NCT research will inform recommendations for a MENA category for the 2020 Census.

TOPIC 6: Use of Geographic Term (MENA) Rather than Ethnic Term (Arab) – 20 comments

Twenty comments expressed concern that populations from the MENA region, specifically Berbers or Amazighs, would be re-classified under the term “Arab” and listed as “minorities.” The comments stated this type of classification would be inaccurate and the use of the “minority” terminology would perpetuate cultural conflicts.

The Census Bureau has no plans to automatically classify all MENA responses as “Arab” or “minority.” Furthermore, the terms “Arab” or “minority” do not appear in the NCT 2015 questionnaire. The Census Bureau plans to hold an expert forum meeting in the Spring of 2015, seeking feedback on MENA classification – which is geographically-based, and includes both Arab and non-Arab countries and ethnic groups. The results of this research and the 2015 NCT will help determine recommendations for a MENA category and classification of detailed national origins and ethnicities for the 2020 Census.

TOPIC 7: MENA as a Distinct Question – 4 comments

Four comments sought to have a distinct question eliciting MENA origin, similar to how Hispanic origin is currently asked separately from the race question. The basis for this request is that people from the MENA region identify with many racial backgrounds and that their ethnic origin is a separate concept. The 2015 NCT will evaluate the inclusion (or exclusion) of a MENA category, and individuals will be advised that they may report all of the groups that they identify with (e.g., MENA and Black; or MENA and White; or solely MENA). In designs which include a distinct Middle Eastern and North African category, the MENA checkbox category will have examples of “Lebanese, Iranian, Egyptian, Syrian, Moroccan, Algerian” along with

a dedicated write-in space for collecting detailed MENA responses. The overall objective for the 2015 NCT is to test alternative designs of the race and ethnic questions to ascertain the best way to elicit and collect data on race and ethnicity for the 2020 Census, including the reporting of multiple race and ethnicities. The results of the 2015 NCT research will inform recommendations for a MENA category for the 2020 Census.

#### TOPIC 8: MENA Examples on Questionnaire – 8 comments

Eight comments urged the Census Bureau to consider specific MENA ethnicity examples listed on the forms. Four of these comments stressed representing the diverse community in the examples, suggesting the use of at least one example from each of the following regions: the Levant, North Africa, Sub-Saharan Africa, Gulf States, a “non-Arab” country (such as Iran), and a sub-national ethnicity (such as Kurdish). Another comment suggested the examples used should include the most common responses based on past data collection with some consideration given to recent immigration trends (i.e., Arab, Yemeni), and should include groups who may question their inclusion in the category (such as Iranian, Somali, Sudanese, Assyrian, Berber, or Amazigh). On the contrary, two comments suggested the examples should not include non-country specific groups who extend beyond the MENA region (such as Berber/Amazigh, Armenian, Assyrian, and others).

The 2015 NCT will evaluate the inclusion (or exclusion) of a MENA category. In designs which include a distinct Middle Eastern and North African category, the MENA checkbox category will have the examples of “Lebanese, Iranian, Egyptian, Syrian, Moroccan, Algerian” along with a dedicated write-in space for collecting detailed MENA responses. We plan to hold an expert forum meeting in the Spring of 2015, seeking feedback on MENA classification. The

results of this research will help determine recommendations for a MENA category for the 2020 Census.

TOPIC 9: Coding of MENA Responses – 4 comments

One comment stressed that the write-ins collected from the 2015 NCT should be carefully coded to consider all types of identities from the MENA region, while three other comments expressed interest in how MENA responses will be coded. The Census Bureau is updating and improving the coding system so that write-in responses representing not only national origins and ethnic groups from the MENA region, but around the world, will be efficiently collected, processed, coded, and categorized.

TOPIC 10: Provide Write-In Area for MENA Responses – 2 comments

Two comments stressed the importance of having a write-in area so that MENA respondents can write in their specific ethnic origin. The 2015 NCT will evaluate the use of a MENA response category, and designs which include a distinct MENA category will have MENA examples of “Lebanese, Iranian, Egyptian, Syrian, Moroccan, Algerian” along with a dedicated write-in area for collecting detailed MENA responses. The results of the 2015 NCT research will inform recommendations for a MENA category for the 2020 Census.

TOPIC 11: Desire to Report Other Detailed Ethnic/Racial Groups – 2 comments

Two comments voiced concern over the possible addition of a MENA category because they felt their own European ethnic origins were not represented on the form. The respondents stated they do not identify as White, and would rather report as Slavic, European, or American on the

Census form. The overall objective for the 2015 NCT is to test alternative designs of the race and ethnic questions to ascertain the best way to elicit and collect data on race and ethnicity for the 2020 Census, including ways to elicit and tabulate detailed responses for all communities. As such, the White category will also employ detailed checkboxes and/or examples, along with a dedicated write-in space to collect detailed responses.

### **COMMENTS ON RACE AND ETHNICITY**

During the public comment period, the Census Bureau received 40 additional submissions related to other aspects of testing for race and ethnicity, with 265 comments covering the 22 topics detailed below.

#### **TOPIC 1: Question Instructions** – 2 comments

Two comments advised the Census Bureau to consider different instructions for the question on race, to ensure that respondents of multiracial or multiethnic heritage better understand they have the opportunity to self-identify with more than one group. Recent Census Bureau qualitative research found that respondents frequently overlook the instruction to “*Mark [X] one or more boxes.*” Some respondents stop reading the instruction after noticing the visual cue [X] and proceed directly to do just that – mark a box – overlooking the remainder of the instruction. Therefore, alternative instruction wording in the 2015 NCT (“*Mark all boxes that apply.*”) aims to improve the clarity of the question and make it more apparent that more than one group may be selected. The results will inform the Census Bureau’s race and ethnicity question design decisions for the 2020 Census.

## TOPIC 2: Order of Race and Ethnic Categories – 1 comment

One comment suggested the order of the race and ethnic categories be revised to list each group alphabetically. This order sequence has been suggested in the past, and the Census Bureau conducted research on alphabetizing the categories. The research showed it was problematic to list the groups in alphabetical order, as many respondents (upon seeing the first alphabetical category, “American Indian or Alaska Native”) checked the box upon seeing the word “American.” For the 2015 NCT, the response categories are listed in order of population size.

## TOPIC 3: Distinguish “Asian” Category and “Native Hawaiian or Other Pacific Islander” Category on Census Forms – 2 comments

Two comments advised the Census Bureau to ensure the categories “Asian” and “Native Hawaiian or Other Pacific Islander” are distinct, per the guidance of the 1997 OMB Standards. The Census Bureau currently tabulates data for the Asian population and the Native Hawaiian or Other Pacific population as separate groups, following the guidance of the 1997 OMB Standards. The 2015 NCT will test alternative ways to collect data for all groups, with variations on the presentation of major categories (e.g., Asian; Native Hawaiian or Other Pacific Islander) along with representative examples and/or detailed checkboxes to assist with the recognition and reporting of both major categories (e.g., Asian; Native Hawaiian or Other Pacific Islander) and detailed responses across all communities.

## TOPIC 4: Concern That Disaggregated Data for Native Hawaiians and Other Pacific Islanders Will Not Be Tabulated – 101 comments

Comments from 101 respondents advised the Census Bureau to improve the visibility of the response options for Native Hawaiians and Other Pacific Islanders by separating them from the Asian response categories, and there was concern that disaggregated data for Native Hawaiians and Other Pacific Islanders will not be published. The 2015 NCT will test alternative ways to collect data for all groups, with variations on the presentation of major categories (e.g., Asian; Native Hawaiian or Other Pacific Islander) along with representative examples and/or detailed checkboxes to assist with the recognition and reporting of both major categories (e.g., Asian; Native Hawaiian or Other Pacific Islander) and detailed responses across all communities. For example, the combined question approach, which places each major OMB category on a separate line, provides equity and balance for all groups, and improves recognition and visibility. The goal is to collect and tabulate data for major groups (e.g. “Asian,” “Native Hawaiian and Other Pacific Islander,” etc.) as well as disaggregated data for detailed groups (e.g. Chinese, Filipino, Native Hawaiian, Samoan, etc.).

TOPIC 5: Retention of Detailed Checkboxes for Asian and Native Hawaiian and Other Pacific Islander Groups: Quality of Data for Detailed Hispanic Groups – 102 comments

*Preserve Checkboxes and Examples from 2010 Census*

Comments from 101 respondents advised the Census Bureau to use a maximum number of checkboxes and examples for the race/ethnic question, with the number used during the 2010 Census serving as a minimum. The concern from the comments was specifically about the retention of detailed checkboxes for Asian and Pacific Islanders. Our mid-decade research has explored refinements for collecting detailed race/ethnic responses, with the goal of optimizing reporting for all communities. The 2015 NCT will test a range of question design strategies to

elicit the reporting of both major categories and detailed responses across all communities.

These designs include employing multiple detailed checkboxes and/or detailed examples in new web-based designs, as well as paper designs, not only for groups which previously had detailed checkboxes (e.g., Asians, Pacific Islanders, Hispanics), but across all communities. The results of this research will inform recommendations for the race/ethnic question designs for the 2020 Census.

#### *Detailed Reporting Among Asians and Pacific Islanders*

These comments also advised the Census Bureau to consider the potential negative impact on detailed reporting for Asians and for Native Hawaiians and Other Pacific Islanders with some question versions where detailed checkboxes are not present. The concern from some comments is with the ways in which detailed groups can respond and how they will be tabulated (e.g., with a major category, detailed group/checkboxes, and/or a dedicated write-in area). The Census Bureau is sensitive to this concern, and noted in our 2010 AQE recommendations that our mid-decade research would explore refinements for collecting detailed race/ethnic responses, with the goal of optimizing reporting for all communities.

The 2015 NCT will test a range of question design strategies to elicit the reporting of both major categories and detailed responses, not only for groups which previously had detailed checkboxes (e.g., Asians, Pacific Islanders, Hispanics), but across all communities. These designs include employing multiple detailed checkboxes and/or detailed examples across all communities in new web-based designs, as well as paper designs. The results of this research will inform recommendations for the race/ethnic question designs for the 2020 Census.

### *Accuracy of Detailed Hispanic Groups*

One additional comment advised that it is critical that any redesign of the race and Hispanic origin questions does not diminish the quality of data collected about specific Latino national origin and ethnic groups. The commenter stressed that any designs hopefully improve the data quality and specifically enhance the accuracy of national-origin responses. The commenter also advised that the Census Bureau ensure that testing takes into account and is able to obtain accurate information from Latinos who report multiple national origins.

The overall objective for the 2015 NCT is to test alternative designs of the race and ethnic questions to ascertain the best way to elicit and collect data on race and ethnicity for the 2020 Census. Furthermore, the 2015 NCT also presents the critical opportunity to compare the success of different race and ethnicity designs to determine how questions perform in a new web-based data collection method using the Internet that optimizes usage on smartphones, telephone assistance, and in-person response options. These advanced methods, include the retention of detailed Hispanic checkboxes (i.e., Mexican, Puerto Rican, Cuban) and the creation of detailed checkboxes for other racial and ethnic groups. In addition, the test includes a reinterview to assess the accuracy and reliability of the question alternatives for race and ethnicity. This will enable us to evaluate the key research questions, results, and findings to inform recommendations to OMB on the collection and classification of race and ethnicity data for the 2020 Census.

TOPIC 6: Soliciting Detailed Responses in Web-Based Modes – 1 comment

One comment advised the Census Bureau to use a drop-down list for the web-based modes to solicit detailed responses. The employment of a drop-down list was explored, but is not practical since there are thousands of possible detailed responses that represent the myriad national origins, ethnic groups, and tribal responses we that are reported.

The 2015 NCT will test a range of question design strategies to elicit the reporting of both major OMB categories and detailed responses across all communities. These designs include employing multiple detailed checkboxes and/or detailed examples across all communities in new web-based designs, as well as new paper-based designs. The results of this research will inform recommendations for the race and ethnic question designs for the 2020 Census.

#### TOPIC 7: Civil Rights Protections and Data for Sikh Americans – 1 comment

One comment advised the Census Bureau there is a need for data on the Sikh American population. The comment expressed concerns regarding the lack of race and ethnic data to use for the implementation of civil and human rights protections for the Sikh community (a community for which data are not currently tabulated). The comment advised that while Sikhism is the fifth largest religion in the world, it has transformed into a racial and ethnic group due to unique and distinct articles of faith. The comment also voiced the need for Sikh Americans to be counted as a separate group within the Asian category, in order for the Sikh community to know the count of Sikh Americans.

The Census Bureau is undertaking related mid-decade research for coding and classifying detailed national origins and ethnic groups, and our consultations with external experts on the Asian community have also suggested Sikh receive a unique code classified under Asian. The

Census Bureau does not currently tabulate on religious responses to the race or ethnic questions (e.g., Sikh, Jewish, Catholic, Muslim, Lutheran, etc.). The 2015 NCT research and future discussions on this topic will inform the decision for the 2020 Census on whether to tabulate data on the population that self-identifies as Sikh, as a detailed group.

TOPIC 8: Tabulation of Multiple Responses in the Combined Question – 1 comment

One comment asked how the Census Bureau will tabulate multiple responses in the combined question when a respondent marks the White checkbox and the Hispanic checkbox. The 2015 NCT will tabulate responses based on respondents' self-identification, respecting all of what they report. In this scenario, a respondent who marks both White and Hispanic will be counted for both the White category and the Hispanic category.

TOPIC 9: Use of Term “Multiracial” – 1 comment

One comment advised the Census Bureau to consider using the term “Multiracial” in descriptions of the population that identifies with multiple racial groups. The Census Bureau recognizes the increasing use of the term “Multiracial” in the United States has grown in recent years. In preparation for the 2020 Census, the Census Bureau will be developing data tabulation plans and will examine the terms used to describe diverse populations, including the population reporting multiple groups.

TOPIC 10: Concerns About Combined Question on Societal Outcomes and Civil Rights Law Enforcement and Monitoring – 2 comments

Two comments expressed concern about the ability to track social outcomes affected by race and ethnicity, such as residential segregation, if a combined question approach is adopted. The comments advised they wanted to ensure the potential new data will still be useful in the implementation, enforcement, and monitoring of civil rights laws. They commended the Census Bureau's efforts for trying to improve data, however advised that further research is required before deciding whether a combined format will be used.

The Census Bureau has demonstrated how the results from the 2010 AQE research show that the combined question is comparable to current and past Census tabulations on race and ethnicity because it easily maps to the traditional race and ethnicity groups produced by the two separate questions. Furthermore, most data users and federal statistical agencies, including many in the Civil Rights community currently treat "Hispanic" as a "de facto race" category.

The 2015 NCT does not treat the concepts of race and ethnicity as synonymous, and respondents are able to report one or more races and/or one or more ethnicities, if desired. The results and findings from the 2015 NCT research will inform recommendations to OMB on question design format (separate vs. combined) for the 2020 Census.

#### TOPIC 11: Comparability to Previous Censuses and Civil Rights Law Tabulations – 1 comment

One comment expressed support for the collection of detailed data that accurately illuminates the diversity within racial and ethnic groups, and commended the Census Bureau for recognizing the need to reevaluate the race and ethnicity questions at a time of ongoing demographic change. At the same time, the commenter wanted to ensure that all Census products provide data that are useful in the implementation, enforcement, and monitoring of the nation's civil rights laws. To

that end, the commenter suggested that any revised format for the race and ethnicity questions must continue to yield, at a minimum, data about all diverse racial and ethnic communities that are compatible with and comparable to data collected during the 2010 and previous decennial Censuses.

In the past few years, the Census Bureau has had key engagements with the Civil Rights community and with academics, national researchers, community and organizational leaders, the Census Bureau's Advisory Committees and with other key stakeholders. In the Summer of 2014, experts from the Census Bureau met with the Equal Employment Opportunity (EEO) Consortium, with members from the Department of Justice (DOJ), the Department of Labor (DOL) and the Leadership Conference on Civil and Human Rights (LCCR) regarding the impact of the combined question on race and ethnic data tabulations. The Census Bureau discussed and demonstrated how the results from the 2010 AQE research show that the combined question is comparable to current and past Census tabulations on race and ethnicity because it easily maps to the traditional race and ethnicity groups produced by the two separate questions. Furthermore, most data users and federal statistical agencies, including many in the civil rights community currently treat "Hispanic" as a "de facto race" category.

#### TOPIC 12: Support for Use of Combined Question Approach – 33 comments

Thirty-three comments expressed support of the Census Bureau's plans to test a combined question approach. Seven of the comments expressed general support for the combined question approach. The 26 additional comments described specific aspects of the combined question that they supported (see below).

*Support of Combined Question as an Effective Opportunity to Self-Identify as Native Hawaiian or Other Pacific Islander*

Four of these comments commended the Census Bureau's continued testing of the combined question because it more effectively provides respondents with an opportunity to identify with the OMB category, "Native Hawaiian or Other Pacific Islander." Additionally, these comments noted preference for the combined question (as opposed to separate questions approach) because of the opportunity to use write-in spaces and/or checkboxes to report detailed Native Hawaiian or Other Pacific Islander responses.

*Support of Combined Question as an Equitable Approach for Collecting Data on All Racial and Ethnic Groups*

Five of these comments commended the Census Bureau's continued testing of the combined question because it represents an equitable approach for obtaining information on all racial and ethnic groups.

*Support of Combined Question as a Way to Increase Accuracy and Reliability of Results*

Four of these comments commended the Census Bureau's continued testing of the combined question format for providing persons of multiracial or multiethnic heritage the ability to identify their diverse heritage, thereby increasing the accuracy and reliability of results.

*Support of Combined Question for Producing Accurate Disaggregated Granular Data*

Four of these comments commended the Census Bureau's continued testing of the combined question format for capturing detailed responses of the Asian, Middle Eastern and North African,

and Pacific Islander communities, which will provide disaggregated granular data on the diversity within those populations, as well as yield accurate counts of the overall Asian, Middle Eastern and North African, and Pacific Islander populations.

*Support of Combined Question for Equitable Distribution of Examples*

One of these comments commended the Census Bureau’s continued testing of the combined question format for creating a more balanced and equitable distribution of examples within each racial and ethnic category, across communities.

*Support of Combined Question for Ability to Identify Racially and by Country of Origin*

Eight of these comments commended the Census Bureau’s continued testing of the combined question format as it provides the opportunity for individuals to report a racial identity as well as a country of origin.

TOPIC 13: Coding and Editing of Sub-Saharan African Responses – 1 comment

One comment asked the Census Bureau for clarification on how Sub-Saharan African responses will be disaggregated, coded, and edited into the Middle Eastern or North African category. For the 2015 NCT, the Census Bureau will not code or edit Sub-Saharan African responses as MENA responses. Sub-Saharan African responses such as Ethiopian, Nigerian, and Tanzanian will be coded as “Black or African American,” per the OMB definition (“A person having origins in any of the black racial groups of Africa. Terms such as “Haitian” or “Negro” can be used in addition to “Black or African American.”). However, if respondents self-identify

as MENA and also report a Sub-Saharan African group (e.g., Ethiopian), they will be tabulated as both MENA and Black.

TOPIC 14: Using “Caribbean” as an Example – 1 comment

One comment suggested that “Caribbean” be used as an example category, expressing concern that the OMB definition for Black only referenced “Haitian” as an example. The 2015 NCT will include refinements to the response options which encourage the reporting of detailed groups from all communities in the Black diaspora, including the African American, African, and Afro-Caribbean communities, through the use of detailed examples, detailed checkboxes, and write-in areas. This includes the use of Caribbean national origins as examples, such as Jamaican and Haitian, to elicit detailed responses within the Black category. These strategies are part of our efforts to optimize the collection of data for major categories and for detailed groups, across all communities. The results of this research will inform recommendations for the race and ethnic question designs for the 2020 Census.

TOPIC 15: Updating OMB’s Category Definition of “American Indian or Alaska Native” – 1 comment

One comment recommended updating the U.S. Office of Management and Budget’s (OMB) definition for the “American Indian or Alaska Native” category, contending that the current definition (“A person having origins in any of the original peoples of North and South America (including Central America), and who maintains tribal affiliation or community attachment.”) is too broad and limits data collection and disaggregation. The Census Bureau has undertaken qualitative research efforts to explore American Indian and Alaska Native (AIAN) identity in

response to recent discussions about the ways in which the race question collects information for AIAN populations.

The 2015 NCT will test alternative ways to collect data for all groups, including the AIAN population. Variations on the presentation of representative examples and/or detailed checkboxes which represent all parts of the American Indian, Alaska Native, and Central/South American Indian definition, will be employed to assist with the recognition and reporting of both major categories (e.g., American Indian or Alaska Native) and detailed responses (e.g., Navajo Nation, Blackfeet Tribe, Mayan, Aztec, Native Village of Barrow Inupiat, Nome Eskimo Community).

#### TOPIC 16: Consultations with American Indian and Alaska Native Tribal Leaders on 2015 NCT

##### Planning – 2 comments

Two comments recommend that formal consultations with tribes, tribal leaders and representatives, and American Indian and Alaska Native organizations and stakeholder populations need to take place before the 2015 NCT is conducted. The comments reference Executive Order 13175: Consultation and Coordination with Indian Tribal Governments, which sets forth the criteria “to establish regular and meaningful consultation and collaboration with tribal officials in the development of federal policies that have tribal implications.” The Census Bureau plans to engage in tribal consultations in 2015, and has requested to meet with the National Congress of American Indians (NCAI) in the Spring and Summer of 2015 to discuss recent AIAN research and plans for the 2015 NCT.

#### TOPIC 17: Instructions for American Indian or Alaska Native Write-In Area – 3 comments

Three comments addressed the “enrolled or principal tribe” instructions for the AIAN category’s write-in area, suggesting more research on the instructions to obtain better quality and more user-friendly data for both tribal governments and researchers. Based on discussions with our National Advisory Committee, the Census Bureau undertook qualitative research efforts in the Fall of 2014 to explore whether different versions of the AIAN instructions impact the understanding of the question and reporting of responses by different communities (e.g., Alaska Natives; American Indians who provide tribal information; individuals who identify as American Indian but do not provide tribal information; and indigenous populations from Central and South America). This qualitative research showed confusion among AIAN groups as to what the different terms and concepts mean (e.g., “enrolled”, “affiliated,” “villages,” “race,” “origin,” “tribe,” etc.).

Additionally, the research sought to understand whether the current instruction to, “*Print name of enrolled or principal tribe*” deters some respondents from reporting as AIAN if they are not currently enrolled in a tribe. This research informed plans for the design of the 2015 NCT, which will test variations of the instructions for the AIAN write-in area. We plan to test the instruction, “*Print enrolled or principal tribe, for example...*” on control versions, and the instruction, “*Print, for example...*” on experimental versions, to see how they perform.

#### TOPIC 18: Testing of Tribal Enrollment Question – 3 comments

Three comments recommend adding a question to ask American Indian or Alaska Native respondents, “*Are you enrolled in this tribe? Yes/No.*” We are planning to conduct consultations with American Indian and Alaska Native leaders and experts on this issue, as we begin to make plans to research and test a separate question on tribal enrollment in 2016 and 2017.

TOPIC 19: American Indian or Alaska Native Checkboxes and Write-in Lines – 1 comment

One comment recommends adding multiple write-in areas for people who respond to the AIAN category on both paper and Internet modes, as opposed to the one write-in area that currently exists. The need for this space, according to the comment, is for people who identify as more than one tribe and/or affiliation. The paper forms for the 2015 National Content Test (NCT) employ one write-in area per category. However, respondents may report multiple races and/or origins, and we plan to collect these responses for each write-in area.

The Census Bureau is undertaking qualitative research for the 2015 NCT by testing several design variations with multiple detailed checkboxes, examples, and write-in spaces for “American Indian,” “Alaska Native,” and “Central and South American Indian” responses. The Census Bureau has also requested to meet with the National Congress of American Indians (NCAI) in the Spring and Summer of 2015 to discuss recent AIAN research and 2015 NCT research plans.

TOPIC 20: Guidance on Data Disaggregation Across Federal Agencies – 1 comment

One comment advised the Census Bureau and the U.S. Office of Management and Budget (OMB) to offer guidance on the importance of disaggregation in federal agency reporting and in differentiating between race and ethnicity in reports. The Census Bureau plans to discuss the results of the 2015 NCT research with OMB and other federal statistical agencies as part of a OMB Interagency Working Group for Research on Race and Ethnicity.

TOPIC 21: Further Research on “Race,” “Origin,” and “Ethnicity” Terms – 3 comments

Three comments addressed the need for further research on the use of the terms “race,” “origin,” and “ethnicity” as concepts for the questions on race/ethnicity. Two comments encouraged the use of the term “origin” instead of “race” or “ethnicity” in the question wording. One comment advised the Census Bureau to conduct further research on which terms to use.

The 2015 NCT will evaluate the use of different conceptual terms (e.g., race, origin, ethnicity, or no terms at all) in the wording of questions for collecting data on race and ethnicity. Recent Census Bureau qualitative research found that the terms “race,” “ethnicity,” and “origin” are confusing or misleading to many respondents, and mean different things to different people.

The Census Bureau’s 2010 Alternative Questionnaire Experiment (AQE) research tested the removal of the term “race” from the question, and showed no evidence that removal of the term had any effect on either unit or item response rates. Recent Census Bureau qualitative research tested an open-ended instruction (“*Which categories describe you?*”) and found respondents did not have issues with understanding what the question was asking, and it performed well overall. The results and findings from the 2015 NCT research on alternative instruction wording and terminology will inform the design decisions for the 2020 Census.

#### TOPIC 22: Estimated Burden of Data Collection – 1 comment

One comment inquired about the accuracy of the estimate of the burden of proposed collection of information, as related to race and Hispanic origin question. Our previous and ongoing research has shown that a combined race and Hispanic origin question reduces confusion and is more salient to many respondents. We are continuing to assess the average time to complete the census questionnaire and will make revisions to the burden estimate in the future, as appropriate.

## **COMMENTS ON TESTING OF RELATIONSHIP RESPONSE CATEGORIES**

Within the submissions, the Census Bureau received 13 comments related to testing the relationship response categories, covering the 3 topics detailed below.

### **TOPIC 1: Support for Testing of Same-Sex Relationship Response Categories**– 11 comments

Eleven comments supported the testing of the same-sex relationship response categories.

### **TOPIC 2: Support for Reintroducing “Foster Child” as a Response Category** – 1 comment

One comment supported the reintroduction of “foster child” as a relationship response category.

### **TOPIC 3: Include Relationship Question in the Reinterview Operation** – 1 comment

One comment advised the relationship question be included in the reinterview operation, as it relates to same-sex and opposite-sex relationships. In our effort to help reduce measurement error in the relationship question for spouse and unmarried partnership categories, we are working to include a sex-relationship consistency check in our electronic instrument.

Households with same-sex couples have been reported in the decennial census since 1990. The newly developed version of the relationship question will allow respondents to report explicitly whether they are part of an opposite-sex or same-sex couple.

## **COMMENTS ON TESTING OF WITHIN-HOUSEHOLD COVERAGE**

During the public comment period, the Census Bureau received 96 comments related to testing of within-household coverage, covering the 3 topics detailed below.

TOPIC 1: Support for Testing of Within-House Coverage – 15 comments

Fourteen comments expressed support for the testing of within-household coverage, and one specifically supported the question-based approach.

TOPIC 2: Test Within-Household Coverage Beyond the Internet – 80 comments

Eighty comments advised that Census Bureau test within-household coverage through other means outside of the Internet questionnaire. The Census Bureau acknowledges that improving within-household coverage across modes is important and is continuing to explore the best methods to collect the most accurate rosters for all households and population groups. Due to the space limitations on paper instruments, the detailed coverage questions are not included in the paper questionnaire. However, we will use the overcount probes on the paper questionnaire to collect an alternate address and patterns of residency for each roster member. This is a new feature that was tested in an experimental version of the Census 2010 questionnaire.

TOPIC 3: Consult with American Indian Tribal Leaders – 1 comment

One comment recommended that the Census Bureau consult American Indian tribal leaders regarding within-household coverage. The Census Bureau plans to engage in tribal consultations in 2015, and has requested to meet with the National Congress of American Indians (NCAI) in the Spring and Summer of 2015 to discuss recent American Indian and Alaska Native research and plans for the 2015 NCT.

## **COMMENTS ON WEB-BASED DATA COLLECTION AND CONTACT STRATEGIES**

During the public comment period, the Census Bureau received 104 comments related to web-based data collection modes and the use of different contact strategies, covering the 5 topics detailed below.

### **TOPIC 1: Support for the Use of the Internet Questionnaire** – 4 comments

Four comments expressed support for the use of the Internet questionnaire.

### **TOPIC 2: Support for Different Contact Strategies** – 11 comments

Eleven comments expressed support for the use of different contact strategies to optimize self response.

### **TOPIC 3: Develop a Strong Mobile Platform** – 81 comments

Eighty-one comments asked that the Census Bureau develop a strong mobile platform to help address disparities in broadband use among different racial, ethnic, and socioeconomic groups. The Census Bureau is committed to optimizing self response across all demographic groups, particularly for traditionally hard-to-count populations. Some efforts currently underway to be included in the 2015 NCT include an Internet instrument optimized for mobile devices, such as smartphones, and testing variations in the timing of sending a paper questionnaire. While our goal is to maximize response rates and reduce the reliance on paper, we are aware there are disparities in Internet usage across certain populations and are taking steps to ensure that all households have the opportunity to respond to the census so that everyone is counted.

TOPIC 4: Do Not Rely Solely on Web-based Technology – 7 comments

Seven comments advised the Census Bureau to not rely solely on web-based technology that replaces in-person visits, and two of those comments advised that every household be given the mail-in option for self response. Internet data collection and use of automated instruments is both an opportunity and a challenge. The Census Bureau continues to explore the best ways to use automated instruments to improve data collection and maintain high-quality data, while making questions as respondent-friendly as possible. We are also mindful that not all populations have the same Internet access and connectivity, and are researching methods to optimize response rates for all groups.

TOPIC 5: Consult with American Indian Tribal Leaders – 1 comment

One comment recommended that the Census Bureau consult American Indian tribal leaders to ensure the AIAN community has access to same data collection modes as other communities. While our goal is to maximize response rates and reduce the reliance on paper, we are aware there are disparities in Internet-usage across certain populations and are taking steps to ensure that all households have the opportunity to respond to the census so that everyone is counted. The Census Bureau is mindful that not all populations have the same Internet access and connectivity, and are researching methods to optimize response rates for all groups.

Furthermore, the Census Bureau plans to engage in tribal consultations in 2015, and has requested to meet with the National Congress of American Indians (NCAI) in the Spring and Summer of 2015 to discuss recent AIAN research and plans for the 2015 NCT.

## **COMMENTS ON SAMPLE DESIGN**

During the public comment period, the Census Bureau received 82 comments related to the sample design, covering the 3 topics detailed below.

### **TOPIC 1: Oversample Asians and Native Hawaiian and Other Pacific Islanders** – 80 comments

Eighty comments advised oversampling Asians and Native Hawaiians and Other Pacific Islanders, to ensure an adequate sample of both large and small groups across all panels. The complex sample design of the 2015 NCT is still being developed. The sample will include oversampling of various race and ethnic groups, including Asian and Native Hawaiian or Other Pacific Islander populations, as well as American Indian or Alaska Native, Black or African American, Hispanic or Latino, and Middle Eastern or North African populations.

### **TOPIC 2: Include American Indian and Alaska Native population in the Sample and Reinterview Operation** – 1 comment

One comment advised that the American Indian and Alaska Native population be included in the sample and the reinterview operation. As noted above, the complex sample design of the test is still being developed. The sample will include oversampling of various race and ethnic groups, including American Indian or Alaska Native populations, as well as Asian, Black or African American, Hispanic or Latino, Middle Eastern or North African, and Native Hawaiian or Other Pacific Islander populations.

### **TOPIC 3: Conduct the Test in Areas with Large MENA Communities** – 1 comment

One comment advised that the testing be conducted in areas with large MENA communities. As noted above, the complex sample design of the test is still being developed. The sample will include oversampling of various race and ethnic groups, including the Middle Eastern or North African populations, as well as American Indian or Alaska Native, Asian, Black or African American, Hispanic or Latino, and Native Hawaiian or Other Pacific Islander populations.

### **COMMENTS ON LANGUAGE ASSISTANCE**

During the public comment period, the Census Bureau received 258 comments related to language assistance, covering the 7 topics detailed below.

#### **TOPIC 1: Support for Language Assistance** – 11 comments

Eleven comments expressed support for language assistance in non-English languages.

#### **TOPIC 2: Provide More Details on Language Assistance** – 1 comment

One comment requested additional information on the planned language assistance. Prior Census Bureau research on enumeration shows that non-English speaking households are one of the hard-to-reach and hard-to count population groups encountered during census enumeration operations. In order to overcome the challenges faced by Limited English Proficiency (LEP) populations, the Census Bureau continues to research and refine options for non-English support and is planning large-scale language testing in 2016/2017, where we plan to identify, test, and refine ways to optimize non-English questionnaire designs and response options in multiple languages, and ensure translation accuracy and cultural appropriateness and relevance in all

translated materials. The Census Bureau is also forming a National Advisory Committee Working Group on Language to help plan for the large-scale language testing.

In advance of the planned large-scale language testing in 2016/2017, the 2015 National Content Test will have the Internet instrument in English and Spanish, as well as the bilingual paper questionnaire in English and Spanish. Telephone questionnaire assistance will also be available in multiple non-English/non-Spanish languages, as well as information about the test in multiple languages.

TOPIC 3: Include Multiple Languages During Internet Push – 1 comment

One comment advised the inclusion multiple language during the Internet Push operation. Please refer to the response to “Topic 2: Provide More Details on Language Assistance” above.

TOPIC 4: Include Asian Languages in Contact Strategies – 80 comments

Eighty comments advised the inclusion of Asian languages in contact strategies. Please refer to the response to “Topic 2: Provide More Details on Language Assistance” above.

TOPIC 5: Provide Assistance in Multiple Languages – 84 comments

Eighty comments advised adequate Asian and Pacific Island language assistance, three comments advised the inclusion of African languages, one comment advised the inclusion of Punjabi in language assistance. Please refer to the response to “Topic 2: Provide More Details on Language Assistance” above.

TOPIC 6: Consult with AIAN Tribal Leaders – 1 comment

One comment recommended that the Census Bureau consult tribal leaders regarding language assistance. Please refer to the response to “Topic 2: Provide More Details on Language Assistance” above.

TOPIC 7: Ensure High Quality Translation – 80 comments

Eighty comments advised high quality translation of non-English materials. Prior Census Bureau research on enumeration shows that non-English speaking households are one of the hard-to-reach and hard-to count population groups encountered during census enumeration operations. The Census Bureau is committed to producing non-English materials with accurate translations that ensure cultural appropriateness and relevance. The Census Bureau continues to refine its translation, review, and adjudication processes in producing non-English materials, to help collect the most accurate information for all non-English speaking households. Furthermore, the Census Bureau is currently in the process of establishing a central translation office that will ensure quality and consistency across all translated products.

**COMMENTS NOT RELATED TO SCOPE OF 2015 NATIONAL CONTENT TEST**

In addition, during the public comment period, the Census Bureau received 5 comments not related to the scope of the 2015 National Content Test, covering the following 4 topic areas.

TOPIC 1: Oppose the Use of Administrative Records Data in Place of Nonresponse Followup – 1 comment

One comment opposed the use of administrative records in place of nonresponse follow up (NRFU) operations. The Census Bureau understands these concerns and is actively conducting

research on these issues. While the 2015 National Content Test will be a self response test and will not include a NRFU operation, the Census Bureau is researching the implications of census quality for potential usages of administrative records during NRFU operations and formed a National Advisory Committee Working Group on Administrative Records, Internet and Hard-to-Count Population.

Please note administrative records will not be the only way the Census Bureau enumerates people in the 2020 Census. Respondents will be able to participate and self respond on the Internet, by phone, or on paper, including opportunities to respond even if they do not receive a questionnaire.

#### TOPIC 2: Add Demographic Questions on Sexual Orientation and Gender Identity – 1 comment

One comment advised the addition of demographic questions on sexual orientation and gender identity. The Census Bureau continues to work with the U.S. Office of Management and Budget and other federal agencies to examine the changing requirements and data recommended for program implementation in the census. Paramount to any decision about proposed change to the census is evidence that the change is needed to collect data from a federal legislative or programmatic need. Since the first census in 1790, census data collection has reflected the information needs of our changing society. The Census Bureau is constantly examining the effectiveness of census questions to collect accurate data on families and people. We will continue to study all content questions to ensure they reflect our society with regard to legislative and federal program needs for an enumeration of the U.S. population. Additionally, the Census Bureau continues to learn from the Department of Health and Human Service's work to collect sexual orientation and gender identity data in their surveys.

TOPIC 3: Integrate Sexual Orientation and Gender Identity Cultural Competency into Field Training – 1 comment

One comment advised the integration of sexual orientation and gender identity cultural competency into field training. The 2015 National Content Test is a self response test and does not include a nonresponse follow-up that requires field training. While training is not in scope for this 2015 National Content Test, the Census Bureau is currently researching and testing best methods in ensuring our field workers of all social and demographic backgrounds are sufficiently trained to respond to all interview situations with cultural appropriateness, sensitivity, and relevance. The training materials will address encountering interview situations and appropriate responses that are meaningful and appropriate for the respondents.

TOPIC 4: Continue Field Partnership and Outreach – 2 comments

One comment advised that the Census Bureau sustain the field partnership program, and one comment advised that the Census Bureau consider the realigned field structure when conducting outreach work. The 2015 National Content Test is a self response test and does not include a nonresponse follow up that involves field partnership work. In relation to engagement and discussion with stakeholder and advisors in relation to the 2015 NCT, the Census Bureau has been involved in ongoing dialogues, outreach discussion, and engagement with many diverse advisors and external experts. We worked with them throughout the design phase, implementation, and release of the results, and continue to now as we make our next steps towards 2020. We also continue a long tradition of outreach and dialogue with myriad racial and ethnic communities, as well as academic scholars and expert researchers.

## **9. Paying Respondents**

Respondents participating in this survey will not receive any form of compensation for their participation.

## **10. Assurances of Confidentiality**

The Census Bureau will conduct the 2015 National Content Test under the authority of Title 13 United States Code Sections 141 and 193. All respondents who participate in the 2015 National Content Test will be informed that the information they provide is confidential under that law, but that the same law makes participation mandatory. All collected information that identifies individuals will be held in strict confidence according to the provisions of Title 13 United States Code, Section 9.

## **11. Justification for Sensitive Questions**

The Census Bureau collects racial and ethnic data in accordance with the 1997 Office of Management and Budget (OMB) standards on race and ethnicity. Information on race and Hispanic origin is required for many Federal programs and is critical in making policy decisions, particularly for civil rights. States use these data to meet legislative redistricting principles. Racial and ethnic statistics are used in planning and evaluating government programs and policies to ensure they fairly serve the needs of each community and to monitor against discrimination in these programs and in society. Race and Hispanic origin data also are used to promote equal employment opportunities and to assess racial and ethnic disparities in health and environmental risks.

The Census Bureau is currently considering the addition of new answer choices for the relationship question that provide a respondent with the option to select a same sex partner. In August 2009, the Secretary of Commerce requested that the Office of Management and Budget (OMB) establish an interagency task force (Measuring Relationship in Federal Household Surveys (MRFHS)) to research issues related to improving the collection and tabulation of marriage and relationship data. One focus of the research was family relationships, particularly with respect to same-sex married and unmarried couples. The Census Bureau, as part of the MRFHS Interagency group, and along with some 20 other agencies, worked to develop a question that would better measure same-sex couple households. The first phase of research involved focus groups with persons in cohabiting or married relationships, with a focus on those in same-sex relationships, but also including those in opposite-sex relationships. The focus groups explored the meaning and interpretation of the current decennial Census and American Community Survey (ACS) relationship and marital status items. The second phase of qualitative research, conducted by the Census Bureau under the auspices of the OMB working group, involved cognitive interviews centered on several options for question wording based upon findings from the focus groups. The result of this development work was revised wording for the relationship question, and planned testing in larger scale quantitative content tests. The working paper issued by the MRFHS working group is available at [http://fcsmsites.usa.gov/files/2014/04/MRFHS\\_StatisticalPolicyWorkingPaper201408.pdf](http://fcsmsites.usa.gov/files/2014/04/MRFHS_StatisticalPolicyWorkingPaper201408.pdf) and contains the recommended wording for the revised question, as well as a description of the development work undertaken by the group. . The National Content Test includes testing the new relationship question that employs answer categories for coupled households by type: opposite-sex husband/wife/spouse, same-sex husband/wife/spouse, opposite-sex unmarried partner, and

same-sex unmarried partner.

During the development process, the Census Bureau involved a group of outside experts to provide input and feedback. We have also been in conversation with other countries that use very similar questions – the United Kingdom, New Zealand, Canada, and Australia. The Census Bureau has already conducted some smaller scale tests with the new question: the Survey of Income and Program Participation (2013 and 2014) the 2013 American Community Survey – Questionnaire Design Test; the 2013 American Housing Survey; and the 2014 Census Test. The National Content Test will be the first truly large scale environment for testing these question types which also provides three modes of response; Internet, paper, and TQA. The Census Bureau will also include cognitive testing in Spanish since the cognitive testing done in the development phase was only conducted in English.

## **12. Estimate of Burden Hours**

The Census Bureau estimates an average burden of 10 minutes for a household or person to complete a census questionnaire, whether by Internet, telephone, or personal interview. The estimate is based upon the burden for similar questions asked during the 2010 Census.

An estimated 1,200,000 survey invitations will be mailed out to selected households. A sample of those who respond will be selected for a content reinterview on race and ethnicity or household coverage (estimated reinterview workload of 100,000). The Census Bureau estimates a 40 percent response rate on the Internet and a 55 percent response rate overall. The burden estimates in the table below are an upper bound and based on a theoretical 100 percent response, rather than our expected response rate.

|                       | <b>Total # of Respondents</b> | <b>Estimated Response Time</b> | <b>Estimated Burden Hours</b> |
|-----------------------|-------------------------------|--------------------------------|-------------------------------|
| Initial Response      | 1,200,000                     | 10 minutes                     | 200,000                       |
| Telephone Reinterview | 100,000                       | 10 minutes                     | 16,667                        |
| <b>Total</b>          | <b>1,300,000</b>              | --                             | <b>216,667</b>                |

### 13. Estimate of Cost Burden

There are no costs to respondents other than their time to participate in this data collection.

### 14. Cost to Federal Government

The cost of the operation is covered under funding for the 2015 National Content Test, Research and Testing Program and is estimated to be \$7.254 million.

### 15. Reason for Change in Burden

The increase in burden is attributable to the information collection being submitted as a new collection.

### 16. Project Schedule

| <b>Milestone</b>                           | <b>Date</b>                      |
|--|----------------------------------|
| Initial mailout and response period begins | August 24, 2015                  |
| Census Day                                 | September 1, 2015                |
| Complete self response data collection     | October 31, 2015                 |
| Conduct Reinterview                        | September 21 - November 23, 2015 |

### 17. Request to Not Display Expiration Date

No exemption is requested.

## **18. Exceptions to the Certification**

There are no exceptions to the certification.