



11/14/2022

United States Census Bureau
4600 Silver Hill Rd.
Washington, DC 20746

Re: Docket Number USBC- 2022-0004
RIN 2022-17647

To Whom it May Concern:

We write in response to the August 17th, 2022, notice and solicitation of input or suggestions on 2030 Census Preliminary Research published by the United States Census Bureau in the Federal Register. An accurate Census count is critical to all individuals and communities as this data is used to inform decisions on redistricting, reapportionment, and the deployment of federal funds for hundreds of programs with an allocation over \$800 billion annually.¹ NALCAB appreciates the opportunity to submit comments to strengthen the 2030 Census and ensure an accurate count of Latinos, immigrants and other undercounted, underserved, and misrepresented communities.

NALCAB, the National Association for Latino Community Asset Builders, is a US Treasury-certified Community Development Financial Institution (CDFI) that represents and serves over 190 diverse nonprofit community development and asset-building organizations across the country. Over half of our members are lenders, more than 50 of which are certified CDFIs. These organizations uplift Latino communities by strengthening access to quality affordable housing, safe financial products and services and the ability to start and grow successful businesses. Many of the people served by the NALCAB Network are low- to moderate-income individuals who are first- or second-generation immigrants. During the COVID-19 pandemic, NALCAB mobilized over \$17.6 million in grants and low interest loans, supporting over 120 nonprofits and 600 small businesses.

For Latino communities, which are disproportionately low-income, underserved and historically undercounted, being counted accurately has economic impacts and can help boost their economic trajectory. On the community level these data affect affordable housing resources, health care services, transportation investments, and much more. With evidence in states like North Carolina, where Latino students are driving up enrollment in certain districts

¹<https://www.childtrends.org/publications/undercounting-hispanics-in-the-2020-census-will-result-in-a-loss-in-federal-funding-to-many-states-for-child-and-family-assistance-programs>



but the undercount results in stagnant funding in their schools.² There is no question that being counted accurately is critical to ensure the needs of our communities are accurately met, and do not fall short only furthering the divide with populations who are accurately counted, supported, and recognized.

For decades the Latino population has been undercounted, just 10 years ago we were undercounted at a rate of over 1.5%³ in comparison to overcounts seen amongst the White-non Latino population.⁴ As noted in the Bureau's report on the 2020 Census, Latinos were undercounted at an even higher rate than seen in recent history, a rate of nearly 5%.⁵ Although this is a trend that persists, it does not elicit the same response from the Bureau as seen amongst other undercounted groups such as children.⁶ While the Bureau has admitted that it cannot pinpoint the precise reasons for undercounts amongst many groups, they have not committed the same effort and resources to understanding the undercount amongst Latinos in the aftermath of the Census as they have with others.

These shortcomings result in our communities receiving a lower funding level than is required when accessing key programs reliant on Census data such as US Department of Housing and Urban Development's Home Investments Partnership Program (HOME) & the Community Development Block Grant (CDBG). Two programs that we know are key to our low-income and underserved Latino communities, through NALCAB's annual membership survey we found that over 50% of the organizations we serve access these two programs which are affected by the undercount. The fact is, an inaccurate count will rob Latinos of hundreds of millions in key resources for families, education, Medicaid and much more which is vital to these individuals and communities.

The Bureau's solicitation for input raises important questions and NALCAB is pleased to see the Bureau recognizing the severity of the miscounts throughout the 2020 Census. We offer the following recommendation to better ensure an accurate count for Latino and other minority communities.

² <https://www.edweek.org/policy-politics/less-funding-less-representation-what-a-historic-undercount-of-latinos-means-for-schools/2022/04>

³ <https://www.brookings.edu/blog/how-we-rise/2022/03/24/what-are-the-consequences-of-the-latino-undercount-in-the-2020-u-s-census/#:~:text=According%20to%20the%202020%20Census,children%20in%20the%20United%20States.>

⁴ <https://www.npr.org/2022/03/10/1083732104/2020-census-accuracy-undercount-overcount-data-quality>

⁵ <https://www.census.gov/newsroom/press-releases/2022/2020-census-estimates-of-undercount-and-overcount.html>

⁶ <https://www.census.gov/library/stories/2022/03/despite-efforts-census-undercount-of-young-children-persists.html>



Robust Federal Funding

While the Fiscal Year (FY) 2023 budget request from the Census Bureau included a funding increase from the prior years in which funding remained stagnant or was cut⁷, consistent robust funding is needed to equitably reach demographic groups and geographic areas. Importantly, with the growing immigrant population – often termed as ‘hard to reach’ as well as the challenges faced in 2020 Census collection the Bureau must be fully resourced. Notably for the FY23 request and for future budget requests, while the overall increase in funding is positive, we urge that the funding be targeted at resources within the Bureau that are key to securing an accurate count. As seen in the FY23 budget justification, many of the recommendations issued by the Government Accountability Office (GAO) and the agency’s Office of the Inspector General (OIG) which have gone unobligated call for increased and updated trainings and resources for Bureau personnel.⁸ This is an area of need and key that appropriate funding is attained to ensure personnel and the Bureau are adequately prepared for any challenges presented by the 2030 Census. Finally, we urge the Census Bureau to continually self-evaluate in a detailed manner to identify their shortcomings and the necessary resources needed to address these issues.

Outreach Solutions

Specifically in response to the solicitation of input points (A) and (D), NALCAB is encouraged by the Complete the Count Committees utilized during the 2010 and 2020 Census which were formed to develop and implement Census awareness campaigns through partnerships between government and community leaders to encourage all individuals to get counted.⁹ In moving forward, we urge the Census Bureau to enhance these committees by explicitly partnering with trusted grassroots organizations in minority and traditionally hard to reach communities in their outreach efforts. The consistent undercounts point to an inability to connect with Latino and minority populations therefore we recommend that the Bureau review the structure, resources and support of these committees to better help them achieve their goal. Organizations such as NALCAB and those in our membership networks have deep roots in these communities and the trust of residents who may otherwise not be reached by traditional outreach methods. To that end, we recommend that not only should the Census Bureau work in greater conjunction with local organizations but also rely on the outreach infrastructure they have already built within their communities. These organizations are best placed to create meaningful contacts with individuals, through their understanding of what

⁷ <https://www.commerce.gov/sites/default/files/2022-03/FY2023-Census-Congressional-Budget-Submission.pdf>

⁸ <https://www2.census.gov/about/budget/congressional-budget-justification-fy-2023.pdf>

⁹ <https://www.census.gov/content/dam/Census/newsroom/press-kits/2018/ccc.pdf>



mediums and language best reaches their population, elicits responses and creates greater buy-in amongst hard to reach, disenfranchised groups.

Technology Solutions

The Latino population disproportionately relies on their mobile device as the primary device to connect to the internet. While only 10% of White smartphone owners are “smartphone dependent” the number rises to nearly 25% amongst Latinos.¹⁰ Understanding certain trends amongst Latino and other minority communities can assist the Bureau in understanding how to best reach these populations as they roll out digital outreach campaigns ahead of the 2030 Census. Latinos are connected, and when speaking about mobile connection specifically- more so than any other minority group.¹¹ It is key that the Census Bureau consider that in Latinos they are working with a tech savvy population that is willing to gain knowledge from and use online tools should they be provided and properly marketed by the Bureau. With this understanding it is important that the Bureau hones in on the platforms and mediums used most by the Latino population, a well documented one being WhatsApp’s messaging service¹² and more recently numbers have significantly grown in usage of streaming services such as Hulu.¹³ While these platforms and mediums may present new challenges in outreach, they also provide an opportunity to meet Latinos in a space where they are comfortable and more receptive to outreach strategies. For the Latino population and efforts to accurately count them, technology provides major opportunities should the Bureau choose to make unique efforts to connect with the population and forgo traditional digital outreach and marketing methods.

Conclusion

The legacy of data which is unrepresentative of the Latino population has a direct impact on our communities who seek assistance and resources from key programs but are not recognized due to these undercounts. This maintains barriers to resources in the communities who need it most- expanding upon a legacy of underfunding and misrepresentation. Further, our communities are not accurately represented within redistricting and reapportionment- fundamentally their political participation has been erroneously changed every 10 years. That said, the Census Bureau’s willingness to come forward and seek best practices to ensure a

¹⁰ <https://www.pewresearch.org/hispanic/2016/07/20/3-hispanics-and-mobile-access-to-the-internet/>

¹¹ <https://www.pewresearch.org/hispanic/2016/07/20/3-hispanics-and-mobile-access-to-the-internet/>

¹² https://www.pewresearch.org/internet/2021/04/07/social-media-use-in-2021/?utm_source=Pew+Research+Center&utm_campaign=acb6afc369-EMAIL_CAMPAIGN_2021_04_09_02_57&utm_medium=email&utm_term=0_3e953b9b70-acb6afc369-400117905

¹³ <https://www.npr.org/2022/09/16/1123296056/latino-viewers-heavily-influence-the-popularity-of-streaming-shows-a-study-finds>



more accurate count for our Latino and hard to reach low-income communities is a positive step alongside the increased budget request. NALCAB looks forward to working closely with the Census Bureau to help establish a system that accurately counts Latino and minority low-income communities in 2030 and beyond. We offer these recommendations to help ensure our communities are properly represented and supported.

Sincerely,

A handwritten signature in black ink, appearing to read 'Oscar Marroquin', with a long horizontal flourish extending to the right.

Oscar Marroquin, Public Policy Analyst