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March 4, 2026

The Honorable Howard Lutnick
Secretary
Department of Commerce
Washington, DC 20230

Dear Secretary Lutnick,

We the undersigned organizations represent thousands of census data users in the public, private, non-profit and scientific sectors. Given how essential high-quality, accurate, and accessible census data are to our members, we are writing in response to a recent Federal Register announcement regarding planned changes to the 2026 Operational Test in support of the 2030 Census. We appreciate the opportunity to express our views regarding this extremely consequential step in preparations for the 2030 Decennial Census.

Elimination of Test Sites

First and foremost, we are deeply troubled by news that the number of test sites has been reduced from six to two locations without a clear rationale. The original six sites were chosen after years of research to ensure the Census Bureau could adequately test innovative enumeration strategies and data collection technologies with the goal of making the 2030 Census more accurate and cost effective.

The sites that were eliminated (tribal lands within Arizona; Colorado Springs, Colorado; Western Texas; and Western North Carolina) encompassed rural communities, tribal lands, and military installations as well as large regions with limited cell phone service and few physical mailing addresses. We are concerned that removing these sites will ultimately exacerbate the undercount of historically hard-to-count populations, including American Indians, young children, rural residents, Latino, and Black communities. As a reminder, in the 2020 Census, Latinos experienced a 4.99 % net undercount (more than three times the rate of the previous decade); Native Americans on reservations experienced a 5.64 % undercount; and Black communities experienced a 3.30 % undercount. Further, the 2020 Census resulted in the highest undercount of young children (ages 0-5) since the Census Bureau started collecting these data in 1950. When populations are undercounted, data quality is compromised.

Reducing the scope and size of the 2026 Census Test jeopardizes the outcome of the 2030 Census, setting the stage for potentially high undercounts of regions and populations in the next decennial. We urge the Department of Commerce to

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reconsider their decision and fully restore the originally proposed six sites nationwide.

Proposed Operational Changes

The announcement also includes several operational changes to the 2026 Census Test that we believe further undermine the validity of the 2026 Census Test and jeopardize a successful 2030 Census:

Use of the American Community Survey as Questionnaire

The announcement states that the American Community Survey (ACS) form will be used in the two remaining sites. The intent of the Census Test is to field the decennial questionnaire form. The ACS is a much longer form that asks different questions than those asked in the decennial questionnaire, rendering it inappropriate for use in the 2026 Census Test. Further, using the ACS form comprises the use of data for informing decennial census methodology. **Using any questionnaire other than the decennial census form to test census operations is not scientifically valid and will not produce useful information to improve 2030 Census operations and outreach. Therefore, we urge the Department of Commerce to field the decennial census questionnaire, and not the ACS, in the 2026 Census Test.**

Internet Self-Response in English only

The announcement states that internet self-response (ISR) will be in English only. The original design of the 2026 Census Test had proposed providing ISR in English, Spanish, and Chinese and allowing self-response via several modes (internet, phone, and paper questionnaire). Research has shown that making self-response available in multiple languages ultimately increases self-response, reduces in-field costs, and increases data accuracy. By limiting ISR to English only, more in-field staff will be forced to visit homes that otherwise would have responded online, increasing both costs and respondent burden. **Given these factors, the Department of Commerce should reconsider its decision to limit ISR to English only as well as consider expanding the modes of self-response.**

Elimination of Outreach Tools

The announcement does not mention if several outreach strategies, specifically message testing and mobile and phone-in assistance centers, are being retained in the remaining test sites. By virtue of their exclusion, we assume these activities will not be employed in the 2026 Census Test. **If properly evaluated as part of the 2026 Census Test, these strategies have the potential to save the federal government millions of dollars and improve data quality. For those reasons, we urge the Department to clarify what, if any, outreach strategies will be used and assessed as part of the 2026 Census Test.**

Use of Postal Service Employees

The use of postal service employees as enumerators is not an original idea and has been tested in previous simulations. [A 2011 report issued by the Government Accountability Office \(GAO\)](#) reported that using mail carriers to conduct census field operations at USPS pay rates would not be cost-effective. In 2010, USPS mail carriers cost, on average, about \$41 (city) or \$34 (rural) per hour compared to about \$15 per hour for census part-time enumerators. The GAO concluded it would be more efficient to hire both retired and active postal workers as Census temporary field staff to help with enumeration.

It is also worth noting that the use of postal employees complicates non-response follow up operations since USPS carriers operate under different authority than trained Census Bureau staff who are sworn under Title 13 to protect respondent confidentiality.

Revisiting issues that have already been thoroughly tested diverts funding from developing and assessing other promising strategies that could be used to make the decennial headcount more efficient and accurate. **If the**

Department, however, continues with its plans to test the use of postal service employees in the 2026 Census Test, they should be transparent about the methodology and how this evaluation is going to be different than those conducted in previous years.

In sum, we urge the Department to reconsider the proposed redesign of the 2026 Census Test and to restore promising elements of the test that we have identified. We share a common goal of conducting a successful, constitutionally mandated 2030 Census. We thank you for considering our views as you lead this ambitious effort.

Sincerely,

Population Association of America
Association of Population Centers
American Association for Public Opinion Research (AAPOR)
American Statistical Association
Asian Americans Advancing Justice- AAJC
Asian Texans for Justice
Association for Public Policy Analysis and Management (APPAM)
Association of Public Data Users
California - U.S. Census Bureau Federal-State Cooperative for Population Estimates and for
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Census Quality Reinforcement Task Force
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Family Centered Treatment Foundation
Flolabs Technology
Geospatial Professional Network
Gerontological Society of America
Housing Action Illinois
ICPSR, The Data Consortium
Insights Association
IPUMS
League of Women Voters of the United States
League of United Latin American Citizens (LULAC)
MACS 2030 - Minnesotans for the ACS and 2030 Census
Metropolitan Council (Twin Cities)
MN State Demographic Center
NALEO Educational Fund
RLS Demographics, Inc.
Society for Public Health Education
The Data Center of Southeast Louisiana
The Hispanic and Immigrant Center of Alabama

The Leadership Conference on Civil and Human Rights
Twin Cities Research Group

cc

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