November 15, 2022

Ms. Shannon Wink
Program Analyst, Policy Coordination Office
U.S. Census Bureau
Washington, DC 20233

Submitted via www.regulations.gov

Dear Ms. Wink,

This is submitted on behalf of the American-Arab Anti-Discrimination Committee (ADC) in regards to the notice and request for comment published by the U.S. Department of Commerce, Census Bureau in Federal Register Volume 87, Number 158 on Wednesday August 17, 2022 (Docket No. 220526-0123, "Soliciting Input or Suggestions on 2030 Census Preliminary Research").

ADC is a civil rights organization committed to defending and empowering the lives of people of Arab descent. ADC is a non-sectarian, non-partisan organization that was founded in 1980 by former U.S. Senator James Abourezk, and steadily grew by establishing chapters nationwide. ADC conducts its work on a non-profit basis, operating as the largest Arab American grassroots organization in the United States.

ADC is acutely aware of the consequences that stem from an inaccurate accounting of Americans in the Decennial Census, particularly as it relates to the needs of, and services for, the Arab American community. Among the challenges identified by the Census Bureau in its Federal Register Notice, two stand out as prevalent within the Arab American community, "Distrust in Government" and "Declining Response Rates". As you will see below, ADC's recommendations seek to increase both response rates and data accuracy while amplifying the Bureau's ability to reach and motivate. A single improvement to the 2030 Census underpins the entirety of ADC's suggestions: adding a Middle East and North Africa (MENA) ethnicity category.

Reaching and Motivating Everyone

It is important that the Census Bureau both recognizes that it has historically undercounted population groups, and that there is a commitment to reaching and motivating those groups to respond to the 2030 Census. However, there must also be a recognition that there are groups that have neither been recognized nor counted previously. It is estimated that there are over four million Americans of Arab descent living in the United States. Estimated. Four million Americans who do not feel that the Census will accurately count them, making breaking through our community's entrenched distrust of the government increasingly more difficult.

The single greatest motivating factor for the Arab American community is seeing itself accurately reflected in the Census Questionnaire. The question of adding a MENA ethnicity category has already been tested by the Bureau as part of the work leading up to the 2020 Decennial, and was acknowledged as a valuable tool in providing a more complete and accurate count. Including this category in the 2030 Decennial Census will allow the Bureau to focus its outreach to the Arab American community,

motivating it through highlighting that for the first time in United States history the Census will accurately assess the presence and impact of the Arab American community in the country.

Including the MENA ethnic category would also take steps to address the community's historic distrust in the government. Presently, Arab Americans believe that the federal government does not care enough to understand and address its needs. Countering that belief requires a substantive effort to establish a counter narrative that through an accurate, disaggregated Census count, those needs will be accounted for.

Additionally, the Census Bureau should continue to solicit input from stakeholders, community groups, and nonprofit organizations that represent the Arab American community on ways to reduce confusion around the race and ethnicity question and ensure reported identities are fully captured.

How We Contact Respondents

Arab Americans' entrenched and well-founded distrust of the federal government has historically proven to be a significant obstacle to successful engagement. In order to break through efforts must be taken to partner with community-based organizations and nonprofits. Building upon their networks and community ties will allow the Bureau to ensure that the Arab American community is aware of the Decennial Census, as well as effectively communicate messaging surrounding the inclusion of a MENA ethnic category. These partnership efforts can be made more effective through financial support to nonprofits that promote and help facilitate Census participation, and the Census Bureau should research the possibility of establishing public-private partnerships that leverage philanthropic grants and encourage state-level investment in outreach campaigns. Additionally, in order to facilitate the most impactful outreach campaign the Census Bureau must set local hiring goals while also consulting various community-based organizations early in the design process for the 2030 Census to ensure that effective and proficient staff are supporting regional Census offices around the country.

ADC agrees with the Census Bureau's goal of increasing self-response in all communities as multiple studies have made clear that self-responses to the Census are more accurate and cost-effective. However, a focus on increasing self-response necessitates an increase in funding for additional language access (see Respondent Support Services below), promotional materials, and hyper-local advertising. This connection must be acknowledged for progress to be made.

Above all, the value of extending the anticipated rollout timeline to begin in early 2029 cannot be overstated. Such a rollout, while adding costs, would provide the Census Bureau with the ability to do the necessary work building awareness, trust, and buy-in, while also offering multiple opportunities to educate the community.

Respondent Support Services

Broadly, language access is a significant challenge for the Census Bureau. Out of the more than 300 languages spoken in the United States, the 2020 Census only allowed online and phone responses in 14 and provided basic outreach and advertising materials in those. Those 14 were narrowed down to just two, English and bilingual English-Spanish, for those who chose to respond to the paper questionnaire. These

narrow language options create insurmountable obstacles for a majority first-generation community like Arab Americans. Particularly when most government services are not offered in Arabic, the opportunity to significantly expand the 2030 Census' reach through language access cannot be understated.

It should be noted that a key way to increase both respondents' ability to understand the questions on the Census and trust in the overall process is to provide support in their native language. It is imperative that these language supports are offered, including in households where English is not the primary language spoken at home. Understanding English in the context of everyday life does not equate to understanding it in the context of the Questionnaire, and this must be acknowledged and addressed before outreach can become successful.

In practice, this means offering promotional and informational materials in non-English languages at the same time as English materials. Any delay in release is time that is wasted in generating motivation for the Arab American community. The Census Bureau should start research at the earliest possible moment on identifying language needs at the county and city levels, if not more geographically granular, in order to determine the most appropriate allocation and deployment of resources. Additionally, the Census Bureau must improve the Census Questionnaire Assistance service by focusing on in-language assistance from live representatives.

Thank you for this opportunity to offer some recommendations for a more accurate and successful 2030 Census.

Abed Ayoub
National Executive Director
American-Arab Anti-Discrimination Committee (ADC)