



The Leadership
Conference
Education Fund

*The Hard Count:
A Community Perspective on 2010
Census Operations in the Gulf
Coast and Texas Colonias*

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In releasing this report, our goals are to examine the 2010 census operational challenges in the New Orleans area, hard-to-count areas in Mississippi, and the colonias in the Texas Rio Grande Valley, and, with that knowledge, recommend a set of policy and operational changes to help ensure the most accurate count possible for 2020. The substance and recommendations of the report are dedicated to the countless advocates in the Gulf Coast, Mississippi Delta, and the Texas colonias.

The authors and publisher are solely responsible for the accuracy of statements and interpretations contained in this publication.



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Executive Summary

As the 2010 census approached, The Leadership Conference Education Fund saw the accuracy of the national headcount as one of the major civil rights issues of the decade. The likelihood that the census would undercount racial and ethnic minorities, people with low income, people with limited English proficiency, and others – and the political and financial consequences of that undercount – raised serious civil rights concerns about equality of political representation and economic opportunity. Accordingly, The Education Fund committed significant resources to a collaborative education and outreach campaign, involving both national and local partners, to improve census accuracy in historically hard-to-count communities.

The Education Fund’s national partners were the Asian American Justice Center, the NAACP, the National Congress of American Indians, and the National Association of Latino Elected and Appointed Officials Educational Fund. In collaboration with these partners and community-based organizations across the country, The Education Fund carried out training, promotional activities, and public education efforts in 15 areas where historical and demographic indicators suggested the potential for disproportionately high undercounts. Representatives of national and local partner organizations canvassed low-income neighborhoods and apartment buildings, distributed in-language fliers to ethnic grocery stores, incorporated census themes at local festivals, and identified and filled language gaps in immigrant communities through bus advertisements, radio PSAs, and ethnic media ad buys.

In addition, The Education Fund worked with national and regional census officials and community advocates to help identify operational problems as the census unfolded,

propose solutions, and overcome communication and logistical challenges.

One area of particular focus for The Education Fund and its partners was the Gulf Coast region still recovering from Hurricane Katrina. In 2009, The Education Fund published a report warning of the unique challenges to an accurate census count for the Gulf Coast and recommending a set of policy and operational changes to increase the likelihood of a successful enumeration. Throughout 2010, The Education Fund and its partners worked to keep Census Bureau officials, lawmakers, and local advocates focused on resolving problems as they emerged. For example, in response to strained or failed communications between the Dallas Regional Census Office and local leaders along the Texas-Mexico border and in Mississippi, The Education Fund expanded the scope of its efforts to include the colonias of South Texas and hard-to-count areas in the Mississippi Delta.

This post-census report reviews operational challenges in the New Orleans area, hard-to-count areas in Mississippi, and the colonias in the Texas Rio Grande Valley and makes a set of recommendations to inform planning and preparations for the 2020 census.

Nationally, participation rates in the 2010 census equaled those of the 2000 Census, when the Census Bureau stemmed a three-decade decline in response rates. The combined efforts of the Census Bureau and its partners were not enough to overcome all the obstacles in the Gulf Coast region during the first phase of the 2010 census: initial participation rates in the areas we address in this report were all below the national average.¹ During the field follow-up phase of the count, The Education Fund intensified its efforts to help community-based organizations work effectively with

local and regional Census Bureau offices and achieve their goal of a complete enumeration in underserved communities. As we await the publication of detailed population counts in early 2011, which will allow for a more definitive evaluation of the 2010 census, The Education Fund and its partners are already looking toward the 2020 census and offering recommendations based on their experiences over the past year.

Highlights of our policy recommendations for Congress and the Census Bureau, described in fuller detail in the recommendations section of the report:

- Congressional oversight committees should examine the conduct of the 2010 census in the Gulf Coast region, as well as in hard-to-count areas in Mississippi and the colonias—we believe a field hearing would be a useful venue—to better understand the experiences of community-based organizations while advocates’ memories are still relatively fresh, and to catalogue obstacles and proposed solutions early in the planning process for the 2020 Census.
- Congress should carefully evaluate the final results of the 2010 census in the Gulf Coast region, in light of continued population growth and other indicators of ongoing economic recovery, as well as the consequences of new and persistent barriers to recovery, in considering whether to fund a special Gulf Coast census in 2012 or 2013 as we recommended in our 2009 report.
- Congress and the Census Bureau should consider revisions to the Local Update of Census Addresses (LUCA) program that would give designated community-based organizations an opportunity to assist state and local LUCA officials in their reviews of preliminary address lists.
- The Education Fund strongly supports the Census Bureau’s proposed initiative — reflected in the administration’s Fiscal Year 2011 budget request — to update the Master Address File continuously throughout the decade, allowing the bureau to capture change in the nation’s housing stock more effectively; to work closely with the U.S. Postal Service and leverage other administrative sources to document housing changes in real time; and to contain the cost of future censuses by mitigating the need for a massive canvassing operation a year before each enumeration.

The Education Fund opposes removing the Master Address File from the protection of 13 U.S.C., §9 (which assures the confidentiality of all individually identifiable information the Census Bureau obtains in the course of taking a census), an idea that has surfaced in some advisory committee meetings. Without the strict protection Title 13 offers against using personal and address information against any individual for any purpose, community advocates and local census coordinators might be reluctant to ensure that unauthorized or illegal living quarters are included in the census universe and residents or owners of those housing units might be more reluctant to participate in the census for fear of detection. Operational recommendations for the Census Bureau (for more details, see the recommendations section of the report):

- Examine the effectiveness of the cultural facilitator program in consultation with other stakeholders and determine how to engage partner organizations more effectively in this program in 2020.
- Examine procedures for hiring bilingual field staff to ensure that employees assigned to work with or collect data from people whose primary language is not English are truly conversant in that language and fully understand the culture of the immigrant communities and families with whom they must communicate.
- Establish a task force or working group to document issues that arose in the 2010 census in the Texas colonias and to make recommendations about the process for determining the most effective enumeration method and outreach strategies for these and similar types of communities in 2020. Such a task force should include representatives of local organizations that serve the residents of colonias and other migrant worker communities on a regular basis.
- Partnership specialists should begin outreach to state and local organizations earlier, and more partnership specialists should remain in their positions during the Nonresponse Follow-up operation.

The Leadership Conference Education Fund will continue to monitor the release of data and measurements of coverage from the 2010 Census and might, with its partners, make additional recommendations to the Census Bureau and Congress regarding preparations for the 2020 census.

I. Introduction

The Leadership Conference Education Fund (The Education Fund) worked with national and local partners to carry out training, organizing, and public education efforts in 13 (later expanded to 15) cities where historical and demographic indicators would suggest the potential for damaging undercounts. The Education Fund's national partners were the Asian American Justice Center, the NAACP, the National Congress of American Indians, and the National Association of Latino Elected and Appointed Officials Educational Fund.

In 2009, The Education Fund identified the need for a special focus on the Gulf Coast region. The lingering effects of Hurricanes Katrina and Rita in 2005, the still-recovering housing stock, and significant population changes all contributed to making the 2010 count both the most difficult and important in the region's history.

The stakes were huge: the 2010 census will affect the allocation of federal funds to the Gulf Coast region and representation for these communities in Congress, as well as in their respective state legislatures, for the next 10 years. In Fiscal Year 2008, according to the Brookings Institution, Louisiana received more than \$8.9 billion in federal assistance distributed, based in whole or in part, on decennial census statistics.² The New Orleans metropolitan area alone received \$1.8 billion.³ As a spokesman for the New Orleans mayor told *The Times-Picayune* in July 2009, "a low population count would mean the loss of millions of dollars needed to provide critical services, such as those for children, education and the elderly."⁴ Mississippi received \$5.6 billion, covering community and regional development; health programs; education, training, employment and social services; transportation; income security; and more. And Texas

received nearly \$31 billion that year in federal program funding allocated on the basis of census data.⁵

In August 2009, The Education Fund released a report warning of the unique challenges to an accurate count for the Gulf Coast region in the 2010 census, and recommending a set of policy and operational changes to increase the likelihood of a successful count.⁶ That report was well received by both the Census Bureau and by community-based activists. In a letter responding to the report's recommendations, Census Director Robert Groves called the report "thoughtful" and wrote, "We look forward to the further implementation of your recommendations as we progress toward the completion of the 2010 census."⁷ Trupania Bonner, executive director of Moving Forward Gulf Coast, Inc. said, "Getting an accurate census count will require an enormous effort on the part of everyone from the president, the Congress and the Census Bureau to community-based organizations like ours that have developed a special trust with people in hard-to-count groups. This report should help everyone understand what's at stake and what needs to be done to overcome the obstacles."⁸

In late 2009 and in 2010, The Education Fund and its national and local partners organized public education campaigns to encourage census participation among hard-to-count populations, with activities and events in 13 key cities culminating in a National Week of Action starting March 22, 2010. Campaign volunteers, local activists, and national partners canvassed low-income neighborhoods and apartment buildings, distributed in-language fliers to ethnic grocery stores, incorporated Census themes at local festivals, and identified and filled language gaps in immigrant communities through bus advertisements, radio PSAs, and ethnic media ad buys.⁹

In addition, The Education Fund worked with national and regional census officials and with community-based organizations to help identify problems, propose solutions, and overcome communications and logistical challenges.

In response to concerns identified by community-based groups as the 2010 census shifted into high gear, The Education Fund expanded the scope of its education, organizing and oversight in the Gulf Coast region to include the colonias area of South Texas and hard-to-count areas in the Mississippi Delta. In May 2010, The Leadership Conference on Civil and Human Rights, the 200-member civil and human rights coalition, and 30 local, regional, and national civil rights organizations sent a letter to Rep. William Lacy Clay, D. Mo., chairman of the House Oversight and Government Reform Committee's Subcommittee on Information

Policy, Census, and National Archives, expressing concerns about census operations in historically hard-to-count communities in the Rio Grande Valley, the Mississippi Delta region, and Gulf Coast communities.¹⁰ Among the concerns highlighted were nonreceipt of census forms, insufficient bilingual or culturally sensitive and indigenous census staff, and inadequate communication by census officials with local service organizations and civic leaders in the Rio Grande Valley.

This post-census report reflects that expanded focus. It reviews operational challenges in the New Orleans area, hard-to-count areas in Mississippi, and the colonias in the Texas Rio Grande Valley. All of these areas were under the jurisdiction of the Dallas Regional Census Office (RCO) and Regional Census Center (RCC). In addition, the report makes recommendations to inform planning and preparations for the 2020 census.

II. Counting in the Gulf Coast: High Expectations; Local Frustration; Uncertain Outcome

Demographic and socio-economic conditions in Louisiana and other Gulf Coast states put them at high risk for an undercount even before Katrina disrupted so many lives and communities, and that risk fell disproportionately on minority communities. According to an analysis of 2000 census data by The Annie E. Casey Foundation (AECF), 41.5 percent of Blacks and nearly 30 percent of Asian Americans in Louisiana lived in hard-to-count areas in 2000, compared to 8.0 percent of Non-Hispanic Whites. In Mississippi, 36.6 percent of Blacks lived in hard-to-count areas, compared to 7.8 percent of Non-Hispanic Whites.¹¹ In Texas, nearly half of the state's Hispanic population lived in hard-to-count areas. Hidalgo County and Cameron County, Texas, on the Mexican border, are the most populous of the state's counties with the highest percentages of population living in hard-to-count areas.¹² As noted in The Education Fund's August 2009 report, *Counting in the Wake of a Catastrophe* report, "these racial and ethnic differences point to the potentially destructive impact of distorted, uneven counts on equality and economic opportunity, and the importance of efforts by the Census Bureau and its partner organizations to invest in reaching hard-to-count populations."

The Federal Emergency Management Agency designated 117 counties along the Gulf Coast as disaster areas in the aftermath of Hurricane Katrina. The storm affected a wide area: residents of 31 parishes in Louisiana, 49 counties in Mississippi, and eight counties in Alabama were eligible for Individual Assistance.¹³ Low-lying counties closest to the Gulf of Mexico suffered the greatest damage and displacement of individuals and families. In New Orleans alone, 80 percent of the city was flooded, 107,000 occupied housing units were flooded and an additional 27,000 sustained wind damage.

In 2008, New Orleans was still a city in flux, with 21.4 percent of residents having moved in the previous year, compared to 15.6 percent nationally. The percentage of children living in poverty, 36.7 percent, was more than twice the national rate of 18.2 percent.¹⁴ Orleans Parish (City of New Orleans) grew by 18 percent between July 2007 and July 2009.

A review of the research on demographic and housing data in the Gulf Coast region for The Education Fund's 2009 report confirmed the particular nature of the challenges to an accurate 2010 count in the areas still recovering from Katrina:

- continued large numbers of people in temporary housing
- high rates of vacant housing units
- higher percentages of renter-occupied units relative to owner-occupied units
- significantly higher rates of households that were without phone service two full years after the storm
- difficulty in identifying informal housing arrangements and households in blighted areas
- an influx of people with low English proficiency, many of them undocumented migrant workers who are hard to reach (even family members with legal residence status may seek to avoid participation out of concern for undocumented relatives or friends who may be sharing living quarters)

Even some information that was evidence of good news for the region's ongoing recovery pointed

to potential challenges for the Census Bureau:

- Some of the hardest-hit communities were experiencing the highest population growth rates in the country.
- Ongoing redevelopment, including rehabilitation of damaged properties and new large-scale projects, was creating significant growth in new housing units and population shifts within the region.

The Education Fund's report recognized that the Census Bureau was aware of the unique circumstances in the Gulf Coast region and had taken steps to help ensure an accurate count. Of particular note, the Census Bureau:

- Designated hardest-hit areas for questionnaire delivery by hand (Update/Leave operation) rather than by mail in March 2010, permitting census workers to update the master list – created during address canvassing operations in 2009 – in real time;
- Scheduled a high-visibility 2010 Census kick-off in New Orleans with local and national leaders;
- Put in place a partnership program and hired partnership staff; and
- Planned an extensive advertising campaign targeting both the general public and hard-to-count population groups.

In addition, Congress and the Obama administration included supplemental funding in the American Recovery and Reinvestment Act of 2009 for the Census Bureau to invest in additional outreach to hard-to-count populations.

The Dallas Regional Census Office's decision to use an alternative questionnaire distribution method in areas that normally would receive census forms by mail recognized the inconsistency of mail delivery in many recovering neighborhoods and the state of flux of many housing units and neighborhoods, as residents and developers continued to rebuild and renovate. Census workers delivering questionnaires by hand could make real-time assessments of the likelihood that homes were habitable and occupied or uninhabitable as the census began. They also could identify structures without identifiable addresses, such as sheds, trailers, and garages, serving as temporary living quarters for displaced residents.

The Education Fund also expressed concern in its earlier report about coverage in the Spring 2009 address canvassing operation, due in part to reports from numerous community advocates in Mississippi,

as well as observations by the Commerce Department's Inspector General, about the thoroughness of the operation in rural, poor, and predominantly African-American areas. It appears, however, that efforts by the Census Bureau and by local officials through the Local Update of Census Addresses (LUCA) program produced a reasonably accurate count of habitable housing units in Greater New Orleans. Through the LUCA feedback process, the Census Bureau reported roughly 204,000 New Orleans addresses that would be in the census universe, close to the number local experts estimated.¹⁵ New Orleans officials still challenged the final address list, urging the Census Bureau to restore 50,000 housing units that census workers had deleted from the master file during address canvassing. Census officials assured city leaders that its employees would actively search for homes missing from the address list as they hand-delivered questionnaires during the Update/Leave operation and visited neighborhoods again during Nonresponse Follow-up.

Local media – especially *The Times-Picayune* in New Orleans – featured numerous articles reminding the public about the importance of census participation and chronicling each operation in the months-long census process. Local advocacy groups, including Education Fund community partner Moving Forward Gulf Coast, Inc. (MFGC), enthusiastically supplemented the Census Bureau's communications campaign with creative outreach activities designed to encourage participation by hard-to-count populations, especially Black men, historically at risk of the highest disproportionate undercount rates in the census.¹⁶ MFGC combined in-person training and outreach activities with Internet-based promotion, such as videos featuring local sports icons. The organization hosted more than 30 educational and promotional events from late 2009 through the end of census field operations and produced video public service announcements with local residents in starring roles. Promotional materials from The Education Fund, including posters, palm cards, and T-shirts, helped to supplement the resources of community partners.

Despite the significant spotlight on the census, early participation in New Orleans was disappointing. In the Update/Leave operation, census workers delivered questionnaires in the first two weeks of March, before most American households received their forms by mail. Yet by April 1, only a quarter (26 percent) of the city's households had mailed back a form, far below the pace of return for the state as a whole (44 percent) and the nation (50 percent) at that point in time. While low-responding communities

in the Mail-out/Mail-back universe received a first-time-ever replacement questionnaire in early April, addresses in Update/Leave areas did not get the second form, depriving these neighborhoods of the potential for a significant boost in mail response in the closing weeks of the count's first phase.

Even more troubling was the fact that community organizations received numerous reports from residents who did not receive questionnaires, a concern echoed by advocates in a number of Mississippi's hardest-to-count communities. For example, MFGC said that when the organization's volunteers canvassed the neighborhood during the mail-back phase to encourage participation, several hundred residents in New Orleans' Lower Ninth Ward reported not receiving census forms. In some rural Mississippi and Louisiana coastal communities, households that received their mail at a post office box did not receive questionnaires, which is routine under current census procedures but an anomaly unknown to local advocates.

As the mail portion of the census came to a close in late April, many Gulf Coast communities affected most severely by the 2005 hurricanes had posted participation rates below state and national averages and lower than their comparable 2000 census rates. Only 43 percent of households in Orleans Parish (City of New Orleans) mailed back a form, compared to 58 percent in 2000; in St. Bernard Parish, the mail-back rate dropped to 45 percent from 68 percent in 2000. Louisiana's Plaquemines and Jefferson Parishes were exceptions, with Plaquemines achieving a higher, though still anemic, mail response rate than in 2000 (56 percent versus 54 percent), and Jefferson far exceeding the state's 64 percent response with its 70 percent mail-back rate, although it did not surpass its 2000 benchmark of 71 percent. The three Mississippi coastal counties hardest hit by Hurricane Katrina all saw their participation rates decline from 2000: Hancock County, 54 percent in 2010 compared to 60 percent in 2000; Harrison County, 64 percent compared to 69 percent; and Jackson County, 67 percent compared to 71 percent. The coastal city of Biloxi, Mississippi, achieved a 60 percent mail-back rate, nine percentage points below its 2000 rate. The smaller coastal community of Bay St. Louis, which suffered significant storm damage in 2005, posted a participation rate of 49 percent.

The April 20, 2010, explosion and oil spill at the BP Deepwater Horizon offshore drilling rig added an unexpected layer of potential complexity to the second major phase of the census, Nonresponse Follow-up.

Coming at the end of the mail phase of the count, as Local Census Offices began shifting their focus to the door-to-door visits that would start May 1, the spill and resulting social and economic upheaval in Louisiana's Gulf Coast dominated the news and diverted the attention of elected officials, civic leaders, and local residents, relegating the importance of all other issues – including the benefits of census participation to post-Katrina Greater New Orleans – to the back burner. The immediate economic consequences for many inhabitants threatened to further displace those people the Census Bureau might not yet have counted at their April 1 residence. The sudden drop or suspension of activity in several major economic sectors, such as the seafood, tourism, and oil industries, left many people scrambling to find alternative employment, perhaps outside of the region, putting at risk the Census Bureau's ability to locate everyone who lived in the area on April 1 but had not mailed back their census forms.

With a large portion of the area's households uncounted in the mail phase, nonprofit advocates continued to promote the census heavily during the door-to-door follow-up operation, relying on canvassing, Internet videos, and live radio broadcasts targeting the African-American population.

MFGC continued to hear reports from households that had not received a questionnaire or visit from an enumerator, leading the organization to post additional "ads" online highlighting the telephone response option. The group's executive director, Trupania Bonner, also expressed concern that many Black applicants for temporary census jobs were not hired, while residents in the Lower Ninth Ward and East New Orleans reported seeing many enumerators who clearly did not live in those neighborhoods. He speculated that high arrest rates among Black men in New Orleans may have shrunk the pool of eligible applicants considerably, in light of the Census Bureau's strict guidelines against hiring field staff with arrest records or convictions for all but minor traffic offenses.

Local immigrants rights advocates noted a lack of field staff capable of translating for and relating to non-English speaking residents, especially in the Latino and Vietnamese communities, in both Louisiana and Mississippi coastal communities. MFGC and several other Louisiana-based organizations joined The Education Fund and census partners from Mississippi and the Texas border region in asking Congress to examine obstacles to a full and accurate count in the Gulf Coast through a field hearing (see section

on census operations in Mississippi for a fuller explanation of this request).

* * *

Nationally, participation rates in the 2010 census equaled those of the 2000 Census, when the Census Bureau stemmed a three-decade decline in response rates.¹⁷ However, the combined efforts of the Census Bureau and its partners were not enough to overcome all the obstacles in the Gulf Coast region during the first phase of the 2010 census: initial participation rates in the areas we address in this report were all below the national average, particularly so in the case of New Orleans, where the participation rate was only 43 percent, nearly 30 points below the national average. Nevertheless, mail-back rates in many hard-to-count neighborhoods where national and grassroots organizations had focused their efforts increased by five to 18 percentage points over the 2000 census, an indication that outreach activities were effective.¹⁸ During the field follow-up phase of the count, The Education Fund intensified its efforts to help community organizations work effectively with local and regional Census Bureau offices and achieve their goal of a complete enumeration in underserved communities.

We cannot know just how far the city of New Orleans and surrounding coastal communities have rebounded since the catastrophe of 2005, or how the region's demographic composition has changed, until the Census Bureau publishes 2010 census data for counties, cities, and neighborhoods in early 2011. (The 2010 data was released as this report went to press.) In an August 2010 interview with National Public Radio, Tulane University Professor of Public Health Mark VanLandingham estimated that the 2010 Census would show a population in the low 300,000s for New Orleans. That number would be "lower than what people have

been anticipating," he told host Robert Siegel, noting that some current estimates are as high as 400,000.¹⁹ After completing the Nonresponse Follow-up operation, Dallas Regional Census Office officials speculated that the relatively low participation rates in New Orleans and surrounding parishes reflected a higher-than-expected vacancy rate in neighborhoods still in various stages of post-hurricane rebuilding, rather than a failure of residents to cooperate or of the Census Bureau to identify and enumerate all households.

Whatever the outcome, it is clear that community leaders and local officials took the importance of the 2010 Census to heart and made rigorous efforts to ensure the most accurate count possible despite unique and challenging conditions, both known and unexpected. Their determination and insights helped to shape the Census Bureau's approach to the enumeration in the post-Katrina Gulf Coast and attracted support from the philanthropic sector by highlighting the economic and political stakes for the region and instilling a sense of urgency during census preparations and operations among Census Bureau staff and area residents alike.

The 2010 Census will tell us a great deal about the pace of recovery in the Gulf Coast and will have significant implications for future development and ongoing progress, providing a foundation and road map for both public and private investment decisions. As we await the publication of detailed population counts in early 2011, which will allow for a more definitive evaluation of the 2010 census, The Education Fund and its partners are already looking toward the 2020 census and making recommendations based on their experiences over the past year. A set of recommendations from The Education Fund are included in the final chapter of this report.

III. Mississippi Gulf Coast and Delta: Community Advocates Lead the Way Toward a Full and Fair Count

The prevalence of population and housing characteristics associated with hard-to-count areas made Mississippi a particularly challenging enumeration environment for the Census Bureau. Mississippi has the highest percentage African-American population (37 percent) of any state (excluding the District of Columbia), and a growing number of Asian (especially Vietnamese) and Latino immigrants call the state home. While race and ethnicity are not direct variables in the Census Bureau’s calculation of hard-to-count scores, the agency’s research shows that areas with larger minority populations are more likely to be hard-to-count. Furthermore, the state has a high incidence of several characteristics used to identify hard-to-count communities, including percentage of the population with a high school degree (the state ranks 50th), median family and median household income (51st for both), percentage of people living below the poverty level (1st), and percentage of children below the poverty level (1st).²⁰

Nonprofit organizations working in Mississippi’s lower income and immigrant communities knew all too well the challenges to achieving an accurate census count.²¹ An analysis of Census 2000 data by The Annie E. Casey Foundation found that nearly one-fifth (18.6 percent) of the state’s population lived in a hard-to-count area. Of the roughly 528,000 people living in hard-to-count areas, more than a third (36.6 percent) of Mississippi’s Black population and more than a fifth of both its Hispanic (21 percent) and Asian (23 percent) populations lived in these communities, compared to less than a twelfth (7.8 percent) of the non-Hispanic White population.²²

By 2009, with the start of early 2010 census field operations, many community advocates were organizing census outreach campaigns and preparing

their constituents to apply for temporary census jobs and to cooperate with census workers when the enumeration started.

As The Education Fund noted in its 2009 report, the Commerce Department’s Office of Inspector General had expressed concern about the thoroughness of address canvassing in rural communities, prevalent in much of Mississippi.²³ Regional and community 2010 census partners, such as Mississippi-based Southern Echo, reported that some Local Census Offices might not be hiring local residents familiar with the difficult terrain and hidden housing units in many rural areas to conduct address canvassing. The Education Fund observed then: “Failure to tap local knowledge in historically hard-to-count areas – such as poor, predominantly Black, rural swaths of southern Mississippi – can adversely affect the quality of the address lists used in next spring’s enumeration. Gaps in the final address lists could increase the effort required to locate rural homes when the enumeration starts and put these communities at risk of an undercount.”²⁴ As the Census Bureau transitioned to implementation of the counting process, reports from unsuccessful census job applicants suggested to community advocates a systemic reluctance on the part of Local Census Offices to hire residents of difficult-to-enumerate areas to conduct the count in the neighborhoods in which they lived.

Subsequent observations from community partners as the census unfolded in 2010 indicate that the failure to hire address listers and other staff who were culturally sensitive to their work areas may have gone beyond the state’s rural areas. Census advocates documented large numbers of homes in several low-income, virtually all-Black neighborhoods that did not receive

census forms in the mail (Mail-out/Mail-back areas) or by hand-delivery (Update/Leave areas); many were in communities where partners had reported either an absence of address listers in the earlier operation or the presence of canvassers who clearly did not live in those neighborhoods. While we cannot know specifically why particular addresses did not receive census forms, the general location of substantial numbers of missing questionnaires suggests that address listers were not familiar enough with their assignment areas or perhaps did not feel sufficiently comfortable in all sections of their assignment areas to verify and update fully the preliminary address lists.

In early April 2010, the nonprofit Concerned Citizens For a Better Tunica County, Inc. (Concerned Citizens), a 2010 Census partner conducting considerable outreach activities, sent a memo to the bureau's Southaven Local Census Office (LCO) outlining several significant concerns about operations in the county — concerns that advocates in other Delta and coastal counties echoed. Concerned Citizens reported that many residents had not received questionnaires and that enumerators in some Update/Leave developments were dropping off forms in bulk with building managers instead of delivering them to each individual address. The latter observation appears related to a broader concern raised during the 2009 address canvassing: Civic leaders contended that the Local Census Office was not hiring and assigning supervisors and enumerators in a way appropriate for a small, virtually segregated, predominantly Black (73 percent) county. The assignment of enumerators in Tunica “seem[s] to be contrary” to the Census Bureau’s emphasis on “getting people who are familiar with the area and who are trusted by the people to help count these hard-to-count areas,” the group’s executive director, Melvin Young, wrote.²⁵ He and other grassroots leaders attributed the lack of field staff familiar with low-income, African-American communities to the absence of a Local Census Office in the Mississippi Delta, noting that the LCO in predominantly White and far wealthier DeSoto County covered this classically hard-to-count region of the state. Mr. Young noted that Concerned Citizens previously had brought these and other concerns to the attention of local elected officials and the bureau’s partnership specialist assigned to the area; he requested a meeting with the LCO manager.

With the clock for mail response ticking down and continuing unresolved problems in the field, especially related to nonreceipt of census forms, anxious grassroots organizations turned to The Education Fund for assistance in addressing their concerns at a higher level

within the Census Bureau. Senior Dallas Regional Census Office officials responded quickly to our request for intervention, participating in an Education Fund-facilitated conference call with about 15 organizations promoting census participation among Black, Latino, Vietnamese, and other population groups that are vulnerable to undercounting. While the discussion was constructive and established an avenue for addressing local concerns rapidly, it also was clear that community organizations expected to play a more direct and useful role in achieving an accurate census than the Census Bureau had envisioned for its partners, a scenario that played out in many communities across the country. For example, community leaders believed they could help ensure better coverage during the follow-up phase by reviewing the bureau’s address list for pockets of missing housing units. However, the Local Update of Census Addresses (LUCA) program, specifically authorized by federal law, allows only designated state and local government officials to review these lists. Nevertheless, Census Bureau officials and community advocates agreed to pursue several steps to overcome obstacles in the field. To start, Mississippi groups (as well as those in the Texas colonias) began to compile specific information on neighborhoods where many residents said they had not received a questionnaire. Advocates were particularly focused on African-American neighborhoods in Tunica, Grenada, Hinds, Jefferson Davis, Washington, and Webster counties.

As Local Census Offices transitioned from the mail phase to the labor-intensive Nonresponse Follow-up phase (NRFU), additional worries surfaced among many community leaders. Advocates for Mississippi’s small but growing Latino and Vietnamese immigrant communities were not confident that competent Spanish and Vietnamese speaking enumerators were assigned to visit households in neighborhoods where English is not the primary language. Those working with Latino residents had observed throughout the lead-up to the census that there was only one native Spanish-speaking partnership specialist in the state, insufficient to cover effectively the growing post-Katrina Latino population that stretched from catfish farming to gaming industry communities and elsewhere.²⁶ Census partners were especially dubious that the universe of housing units being reached through NRFU included addresses that did not receive a questionnaire by mail or hand-delivery, especially in areas where entire subdivisions or buildings had been overlooked in the first operation. In light of this latter concern, local advocates also wanted more visible promotion of the telephone response

option for people who believed they were missed in both the mail and door-to-door operations.

The use of cultural facilitators to assist enumerators in contacting and obtaining information from reluctant households created a great deal of confusion among community organizations in Mississippi, the Texas colonias, and elsewhere. Cultural facilitators are not direct employees of the Census Bureau but are hired on an as-needed basis by enumerators or their supervisors to help bridge cultural and language differences that might be preventing census staff from gaining the cooperation of a household during the door-to-door phase. The facilitators are considered contract employees and can be paid on the spot if a census worker only needs an individual's assistance on a single occasion; facilitators assisting on multiple days must complete an I-9 employment form.²⁷ Local advocates initially were not aware of this resource for enumerators and did not have information about who could be hired, and under what circumstances, for these positions.

Community groups appreciated the effort Dallas Regional officials were making to correct problems in the field and to keep them informed about the progress of the count. The regional director or the Regional Census Center director – and sometimes both – continued to participate in frequent conference calls with local partners and The Education Fund to assess the progress of the count in both Greater New Orleans and in Mississippi, as well as in the Texas colonias, answer lingering or new concerns, and to tap local knowledge about areas where residents had not received personal visits. Nevertheless, below-average participation rates²⁸ in Mississippi (67 percent), Louisiana (64 percent), and Texas (69 percent) heightened anxiety about the Census Bureau's ability to assure full coverage in historically undercounted Gulf Coast and border areas. Mississippi census partners remained concerned about the broader implications of persistent operational difficulties in Black, immigrant, and low-income neighborhoods, especially with respect to nonreceipt of questionnaires and a lack of sufficient field staff familiar with these areas and residents. They believed that any comparable problems in similar Gulf Coast communities would jeopardize the accuracy of the census in the entire region, an unacceptable outcome that warranted attention from Congress.

On May 18, 30 local, regional, and national civil rights and grassroots organizations sent a letter to Rep. William Lacy Clay, D. Mo., chairman of the House Subcommittee on Information Policy, Census, and National Archives, outlining their concerns about

census operations in Mississippi, the greater New Orleans area, and the Texas Rio Grande Valley, and requesting a subcommittee field hearing to examine and address these difficulties before the Nonresponse Follow-Up phase ended in early July. (See full letter in Appendix B.) After receiving the letter, Chairman Clay met with Census Director Robert Groves to discuss the issues of concern and possible solutions. Shortly thereafter, Dr. Groves reached out to community census leaders in Mississippi and arranged to meet with all interested partner organizations in the region on June 3 in Jackson, Mississippi. The Education Fund helped to organize the event and worked with both grassroots organizations and Census Bureau staff to set an appropriate agenda. Rep. Bennie Thompson, D. Miss., sent a staff representative to the meeting, as well.

Dr. Groves' visit to Mississippi was a turning point for many community leaders, signaling that the Census Bureau valued their perspective, acknowledged their frustration with many aspects of the count, and understood that the agency must work collaboratively with organizations most knowledgeable about barriers to full participation in order to achieve an acceptable result. The director met with census advocates for well over three hours and joined them for a press briefing to highlight areas of cooperation and encourage Mississippi residents to continue cooperating with census takers. Dr. Groves told the *Jackson Free Press* that enumerators' cultural sensitivity and local knowledge were keys to a successful field operation and promised to ensure that Local Census Offices relied on cultural facilitators whenever necessary to establish trust among wary residents.²⁹ In an on-site video interview with Moving Forward Gulf Coast, Inc., the director praised the region's 2010 census community partners for devoting so much effort to census promotion and recognized the importance of "on-the-ground knowledge" to identifying and resolving operational difficulties, especially in hard-to-count areas.³⁰

The meeting resulted in a new round of radio and print advertising in the Mississippi Delta and in coastal Mississippi and Louisiana counties, where some mail-back rates were disconcertingly low and advocates feared that many households simply were not in the enumeration universe. The new ads, which targeted African-American and Latino audiences, promoted not only the current door-to-door activities but publicized the toll-free telephone response option for those who had not received a questionnaire or a visit from an enumerator. Regional office staff distributed updated promotional fliers to community partners,

highlighting the Nonresponse Follow-Up process and Telephone Questionnaire Assistance lines.

Working with Local Census Offices in Mississippi, the Dallas Regional Census Office compiled information on communities throughout the state where the progress of Nonresponse Follow-Up visits was lagging, allowing grassroots organizers to target their messaging and activities, such as canvassing and leafleting, to neighborhoods with the lowest participation. The regional office also asked local leaders to provide the names of individuals in hard-to-count communities who could serve as cultural facilitators or translators. At the request of local advocates and the Census director, the regional director issued updated guidance to Local Census Office supervisors and to census enumerators, reminding them of the availability of cultural facilitators and translators to help establish trust in communities where language barriers, suspicion, or fear of governmental authorities were impeding progress.

Following the director's Mississippi visit, local advocates and regional census staff continued to confer regularly via conference call, reviewing the progress of the door-to-door operation as the July 10th end to Nonresponse Follow-Up approached and identifying neighborhoods where clusters of unresponsive households remained. The regional director assigned a senior Partnership Program staff member to serve as his "point person" in Mississippi, conferring with community partners and helping to ensure that the set of activities flowing from the meeting with the census director and the ongoing conference calls were implemented quickly and fully with input from all interested parties.

These efforts were important and useful. It is fair to say, however, that the "trust gap" created earlier in the census process when community concerns about hiring and coverage went largely unheeded continued to color the perspective of census advocates during the final weeks of the field follow-up operation, making them skeptical of Census Bureau pledges to reach and count all households. Dallas Regional Census Office officials continued to give general assurances that their methods would ensure complete coverage of all households. But grassroots and regional leaders, in particular, wanted to fully understand the procedures to count residents who had not received census forms or an enumerator visit, to help them track progress and take additional steps to identify all neighborhoods that remained uncounted. Civic leaders continued to work closely with regional Census Bureau staff, determined to ensure

full participation and coverage in the communities they represented. At the same time, however, they renewed their request to congressional overseers to shine an external spotlight on significant operational difficulties that had plagued the census process in this especially hard-to-count region, with a goal of offering solutions and improvements that the bureau could consider early in the formative stages of 2020 census planning. Chairman Clay declined to schedule such a hearing, much to the disappointment of community and regional leaders, but promised to examine operational problems encountered in the Gulf Coast as part of his panel's evaluation of the 2010 census and consideration of ideas for improving future decennial enumerations.³¹

* * *

Community leaders and organizations representing the interests of historically hard-to-count populations in Mississippi's Delta region, immigrant enclaves, and coastal and rural areas identified early operational problems that could threaten the accuracy of the 2010 census. They were particularly concerned about a failure to hire a sufficient number of supervisors, enumerators, and partnership program staff with cultural and linguistic fluency appropriate for the communities and populations to which they were assigned. It is especially important to hire indigenous and culturally knowledgeable staff in neighborhoods where people are wary of government activities and officials. While the Census Bureau provided for the use of cultural facilitators to help enumerators establish trust and communication in hard-to-count communities, it appears that neither Local Census Offices nor community partners in Mississippi were familiar with this resource until field operations were well underway.

The Local Census Office with responsibility for the Delta region appeared to be unresponsive to the concerns of local advocates about the progress of census operations, straining communications between the Census Bureau and its partner organizations and delaying resolution of the most pressing problems. Once The Education Fund helped to establish a direct line of communication with regional and national Census Bureau officials, community leaders saw some progress in coverage of neighborhoods that the Local Census Office had overlooked in early operations, and they appreciated the acknowledgement from Census Director Groves of the enormous value of their efforts in conducting the census. But the agency's early unresponsiveness and oversights in Mississippi, and continued confusion between regional and local

Census staff about procedures such as the use of cultural facilitators, had severely weakened community leaders' trust in the ability of the census process to count all population groups fully and fairly. Their experience highlights the importance of effective communication between local Census Bureau staff and community partners and the need for much stronger oversight from regional census offices to ensure Local Census Office adherence to hiring guidelines and goals and knowledge about the full range of field methods that are available to advance the enumeration effectively. In the future, the Partnership Program should establish and convey clearer information for partner organizations about their role in the census process, and the Census Bureau should consider ways to incorporate local knowledge to a greater extent in planning and executing the enumeration, especially in communities most at risk of an undercount.

IV. Enumerating the Colonias: A Case for Better Communication and Greater Reliance on Local Knowledge

Communities along the Texas-Mexico border that are home primarily to immigrant workers from Mexico and their families – collectively and commonly known as “colonias,” Spanish for “neighborhoods” – present one of the most difficult enumeration environments for the U.S. Census Bureau. The bureau describes these areas as “generally unincorporated and low-income residential subdivisions, lacking basic infrastructure and services,” noting that while the settlements have existed for decades, poorer residents from border cities such as El Paso and Brownsville began moving to the colonias in greater numbers in the 1980s and 1990s, drawn by the lower cost of land and housing.³² According to the state of Texas, there are roughly 2,300 colonias in Texas that are home to a predominantly Hispanic population of 400,000, the majority of whom were born in the United States.³³

The Census Bureau conducted a qualitative evaluation of 2000 census operations in the colonias as part of its broad Census 2000 Testing, Experimentation, and Evaluation (TXE) Program to assess the completed decennial count and inform planning for the 2010 census.³⁴ Researchers identified several major barriers to achieving a complete count in these border communities but found that these challenges varied in degree from settlement to settlement. Those barriers included:

- Irregular housing and addressing;
- Limited English proficiency and limited formal education;
- Concerns regarding confidentiality of census responses; and
- Complex households and households with mobile or transitional members.

Taken as a whole, this range of characteristics clearly placed the colonias among geographic areas historically considered hard-to-count, and the Census Bureau designated the settlements as “Update Enumerate” (U/E) areas – places where it employs modified census procedures to enumerate the population.

Because the decennial census is an address-based survey, designed to count people at a specific geographic location (such as an individual housing unit or group facility) as of Census Day (April 1), the prevalence of irregular housing and addressing in a community makes the widely used mail-out/mail-back method of gathering census responses highly problematic. Consequently, the Census Bureau developed alternative methods for delivering census forms and gathering information from residents in areas less conducive to traditional mail operations. The bureau uses the U/E method primarily in remote locations with irregular housing (for example, missing or inconsistent house numbers, lack of identifiable street names, hidden housing units, or unusually subdivided housing units) or inconsistent postal delivery, and with high rates of mobility. In U/E areas, residents do not receive a standard census questionnaire, either by mail or hand-delivered. Instead, during a designated time period, census enumerators visit every home in a community, confirming each unit’s address and exact location on census maps and collecting responses from residents to the same questions asked on the printed census form. For the 2010 census, the U/E operation ran from March 22 through May 29, 2010.

In addition to the colonias, the Census Bureau designated most American Indian reservations, Alaska Native villages, migrant worker communities, and remote seasonal resorts as U/E areas.

The Census Bureau concluded after the 2000 count that U/E procedures were particularly effective in the colonias, saying in its evaluation that, “census enumerators were able to successfully negotiate the obstacles presented by irregular housing” using the alternate method.³⁵ Census researchers also credited the limited use of “cultural facilitators” – local residents hired on an as-needed basis to help official census takers make contact with hard-to-identify housing units and reluctant households – and *promotoras* – local advocates hired to encourage participation – as well as paid advertisements in Spanish language media, with helping to overcome significant barriers in the colonias in 2000.

Census Bureau staff made several recommendations to improve enumeration of the colonias in 2010 based on their evaluation of 2000 census operations.³⁶ Foremost among their suggestions was an expanded use of cultural facilitators and *promotoras* who are intimately familiar with the population and culture of the colonias, to work alongside census enumerators. (The Census Bureau used facilitators on a limited basis in 2000 in El Paso County colonias.) They also recommended testing the use of Spanish language census forms and enumerator data-gathering forms, as well as revised training methods and materials that focus more on field and on-the-job training than classroom instruction.

Census Director Robert Groves, who took office in July 2009 well after final preparations for the 2010 count were in motion, appears to have recognized the unique challenges the Census Bureau faced in the border region. In February 2010, the director visited the San Carlos colonia in Laredo at the invitation of Rep. Henry Cuellar, D. Texas. An *Associated Press* article described San Carlos as a community with “unpaved roads” and “ramshackle houses,” home to many undocumented immigrants and Spanish-only speakers, with a high incidence of poverty.³⁷ Dr. Groves’ mission was to reassure anxious residents about the strict confidentiality of census responses. Rep. Cuellar emphasized that the census did not ask about immigration status and highlighted the potential loss of needed federal resources and political representation in areas with a census undercount.

Knowing the stakes for the communities they serve, many nonprofit organizations in the Rio Grande Valley eagerly promoted the census and acted as much-needed “trusted voices” among residents who had reason to fear or mistrust federal authorities, especially at a time of heightened anti-immigrant sentiment in many areas. Community-based and regional

organizations conducting census outreach campaigns included Proyecto Libertad, Proyecto Azteca, Lupe, Southwest Workers’ Union, Project ARISE, and the Frontera Asset Building Network. The Equal Voice for America’s Families network partnered with the *Rio Grande Guardian* newspaper to promote the count.

These and other organizations received grants from various regional and national funders for census outreach in hard-to-count communities along the U.S.-Mexico border; some of the larger networks made subgrants to smaller nonprofits throughout the Valley. The Center for Housing and Urban Development at Texas A&M was one of several programs sponsoring local workers, or *promotoras*, to conduct outreach in the colonias in advance of the start of the census.

Community organizers sponsored neighborhood meetings, distributed census materials, and canvassed blocks in the colonias, serving voluntarily as visible, trusted advocates for the Census Bureau in some of the nation’s most difficult to enumerate areas. The Frontera Asset Building Network³⁸ educated its vast network of community partners through workshops, an online information clearinghouse, and town hall meetings.

Activists also engaged schools and Spanish-language television and radio outlets. Parents of school children received calls with a taped public service announcement promoting census participation. Local media featured numerous articles on the census, highlighting the political and fiscal benefits that would flow to the region based on an accurate census count, particularly for schools and emergency services. As census field operations unfolded, the newspaper documented efforts in Spanish-language media (especially *Univision* and *Telemundo*) to promote participation in the Valley and reassure people that their responses would remain confidential. Most notably, local outreach messages highlighted the presumed census plan for the colonias — that residents would receive forms in the mail in mid-March, fill them out in the privacy of their own homes, and mail them back postage-free.

Enthusiasm for the upcoming census, however, turned first to dismay, then frustration, and finally anger, when it became clear that a significant lapse in communication between the Census Bureau and its community partners had led advocates to believe that the bureau would enumerate the colonias using the most common methods: mailing or hand-delivering questionnaires to households and asking residents to mail them back.³⁹ Instead, as most Americans began receiving forms

at their homes in early and mid-March, community leaders in the Valley discovered that households in the colonias had not received theirs. Working through funders, the advocates learned from Leadership Conference Education Fund staff that the less-well-known U/E operation would be used in the colonias, starting in late March and continuing through May.

The reaction from local advocates was swift and clear: they believed that the Census Bureau's failure to fully explain its enumeration plans for the colonias — in fact, its very selection of an alternative counting method — signaled a lack of respect for residents and a poor understanding of life in the colonias. Mike Seifert, a well-known community leader with the Equal Voice for America's Families network, concluded in an op-ed that using the U/E method was “demeaning,” writing that the Census Bureau believed “colonia residents are incapable of filling out a census form.”⁴⁰

As word of the alternative census method planned for the colonias spread quickly among grassroots organizations, elected officials, and journalists, whatever trust and confidence community leaders had in the Census Bureau vanished virtually overnight. Knowledgeable service providers who worked daily with residents within the colonias found it difficult to believe that enumerators could visit all homes in the many neighborhoods comprising these vast settlements; they cited additional barriers such as heightened fear of strangers and the prevalence of large dogs. Another discouraged advocate told The Education Fund, “[It] sounds almost like ... ‘we don't count.’”

More specifically, civic leaders believed the Census Bureau had misled them with respect to enumeration methods, especially since some homes in the colonias had traditional postal addresses and received mail regularly through the U.S. Postal Service. (In fact, the Census Bureau did conduct either mail-out/mail-back or Update/Leave operations in some Texas colonias.) Members of Congress and local elected officials representing the colonias told media outlets that they, too, were unaware that the Census Bureau would count residents using a different method. Community leader Armando Garza, development director for the nonprofit Proyecto Azteca, told *The Monitor* newspaper in McAllen, Texas, “Had we known in November [2009] that 95 percent of the colonias would not be receiving a mailed form, our strategy would have been completely different.”⁴¹ Their own consternation aside, civic leaders also feared that their credibility as trusted advocates for these struggling but hopeful

communities was at risk, having painstakingly laid the groundwork for a conventional counting operation that would not occur. In a letter to Census Director Robert Groves, Hidalgo County Judge Rene Ramirez said, “[W]e have been telling all residents to expect a census form in the mail on or before April 1. This latest news hurts our credibility with the public, especially among those hard-to-count areas.”⁴²

It was The Education Fund's 2010 Census Campaign collaborative — with the National Association of Latino Elected and Appointed Officials (NALEO) Educational Fund taking the lead — that first brought the communications breakdown regarding enumeration of the colonias to the attention of Dallas Census Regional Office officials. Senior Census staff at both the regional and headquarters level seemed surprised to learn of the misunderstanding, especially since the bureau had employed the same method in the colonias for several decades; they believed they had taken steps throughout the period of census preparations to adequately explain the U/E method to community partners and elected officials alike. The regional office issued a press release on April 1 (Census Day), describing what it called “special efforts” to enumerate the colonias and calling the U/E method “the most accurate field operation.”

Regional officials explained to Education Fund staff that there was no advertising about the U/E operation because too many other areas of the media market covering the Texas colonias, as well as some portions of the colonias themselves, were covered either by the mail-out/mail-back or Update/Leave methods. Spanish-language media, however, disputed this concern, noting the presence of radio and print outlets that focus almost exclusively on the colonias. Confusion also reigned about the role of Questionnaire Assistance Centers and Be Counted sites in the Rio Grande Valley; these Census Bureau-operated support activities were designed to assist people in communities where residents were supposed to receive census forms at their homes, but they were not prepared to help people who lived in U/E areas.

As the extent of the operational misunderstanding and subsequent breach of confidence became clear, Rep. Rubén Hinojosa, D. Texas, held a meeting with leading community nonprofits at his Edinburg district office to discuss their concerns about the accuracy of the census in the valley. The organizations and the congressman issued several recommendations, including a request that the Census Bureau establish a task force to monitor the remainder of census operations in the colonias and other

hard-to-count communities in the valley. Civic leaders also highlighted their ongoing concerns about the bureau's ability to hire sufficient numbers of bilingual enumerators familiar with the unique terrain of the colonias.⁴³ In fact, local leaders had been anxious about recruitment and hiring for the colonias enumeration for several months; Rep. Hinojosa said he had asked Dallas Regional Director Gabriel Sanchez for weekly hiring reports starting in mid-February. In mid-March, Census headquarters staff tried to reassure the congressman that the agency was meeting recruitment goals and hiring targets in the valley. By the beginning of April, however, as the U/E field work commenced, regional Census staff acknowledged to the *Rio Grande Guardian* that recruitment of qualified applicants familiar with local communities was lagging in Hidalgo County, even as recruitment efforts were successful for the colonias enumeration in Laredo and other border communities.⁴⁴

Meanwhile, Dallas regional census officials hastily arranged meetings with congressional offices and business leaders in the valley, as well as with community organizations. They also addressed concerns about enumeration plans and the status of census operations generally through interviews with local media, including Spanish language radio.⁴⁵ Based on these meetings and subsequent conference calls, many of which The Education Fund collaborative team helped organize, the bureau agreed to extend the Census Road Tour in the valley and the colonias through May 8; to consider additional advertising to promote the U/E operation; to provide maps of U/E assignment areas to community service organizations; and to hire more cultural facilitators to assist enumerators in gaining the trust of residents during door-to-door interviews. The Education Fund and NALEO urged senior census headquarters officials to authorize more paid advertising targeting the colonias immediately in order to help bridge the communications gap that now threatened the success of the U/E operation in these areas. Census staff moved quickly to accommodate this request, creating a new advertisement to explain the U/E process and moving up the start date of Nonresponse Follow-up advertising on local media to let all households know that census enumerators would soon be on the ground throughout the region, regardless of the counting method used. Community leaders also requested more detailed information on the enumeration schedule for each colonia, which could inform their own continuing outreach efforts and give their staff time to prepare residents for an enumerator visit during the U/E period.

Foundations supporting community-based census outreach offered encouragement to their grantees and provided a forum for groups to share information and ideas to salvage their promotional activities. Despite their disappointment and frustration, local advocates mobilized quickly to revise their outreach messages and materials and to inform their constituencies about the U/E process. New messages included descriptions of U/E household visits, with an emphasis on data confidentiality and reminders that all people living in a household on April 1 should be reported. The Education Fund prepared a fact sheet on the U/E operation, outlining the exact responsibilities of enumerators going door-to-door and suggesting messages that community advocates could use to ease fears among residents and encourage their cooperation with census takers.

While these initial steps helped to ensure that census advocates understood the enumeration plans for the colonias, it was clear that it would not be easy to restore the confidence of local leaders in the Census Bureau or in the likelihood of an accurate census in the colonias. The NALEO Education Fund (NALEO), a partner in The Education Fund's 2010 census collaborative, offered to serve as a bridge and mediator between Census Bureau officials and community organizations as the count progressed.⁴⁶ NALEO assigned several staff members to focus almost exclusively on assisting community advocates with their census campaigns, monitoring the progress of the count in the colonias, and ensuring that Census officials addressed community concerns in a timely and thorough manner. At NALEO's suggestion, the Census Bureau assigned a senior level, bilingual staff member from the Seattle Regional Census Office to work exclusively with partner organizations and elected leaders in the valley as the enumeration progressed, helping to answer questions and provide requested information quickly. Also at NALEO's urging, Census Director Groves again visited the valley on April 17, as the mail phase of the national count was winding down and the Census Bureau was preparing for the massive Nonresponse Follow-up operation starting May 1.⁴⁷ In many Valley communities designated as mail-out/mail-back areas — including Rio Grande City in Starr County, where the director appeared with Rep. Cuellar, Mayor Ruben Villarreal, and other local leaders — participation rates were disturbingly low, foreshadowing the enormity of the challenge to complete the count in all communities, regardless of the type of method used. The director said the bureau had hired additional staff in the region, and he urged residents who had not yet been counted to “react in a favorable way” when an enumerator visits.⁴⁸

Alarm about census operations in colonias along the entire U.S.-Mexico border extended to Washington, D.C., where the Congressional Hispanic Caucus (CHC) sent a strong letter of concern to Director Groves on April 19. Led by Chairwoman Nydia Velazquez, D. N.Y., the CHC noted that many colonias residents were just learning that they would not receive census questionnaires in the mail, and it questioned the Census Bureau's ability to hire a sufficient number of qualified, local enumerators to enumerate the colonias door-to-door. The caucus made several recommendations to help ensure a more accurate count in these communities, including extending the U/E period beyond May and into early July, if necessary; working collaboratively with local organizations and media to provide advance notice of visits neighborhood by neighborhood; and keeping Be Counted sites open in the colonias and rural border areas through July 10, the scheduled end of Nonresponse Follow-up.⁴⁹

As the U/E operation continued in the colonias, community leaders continued to express skepticism that the Census Bureau could achieve a comprehensive count of residents through a door-to-door count. Local nonprofits partnered with NALEO to establish a hotline for residents to call if they did not receive a visit from an enumerator or to report other concerns about the enumeration. NALEO continued to act as an intermediary between community advocates (who had formed their own census task force), elected officials, and the Census Bureau, arranging meetings, sharing information and concerns, and suggesting solutions to challenges the Census Bureau encountered in the field. Members of Congress representing the valley urged constituents in all communities to cooperate with enumerators who were going door-to-door.

Publicly, regional Census Bureau officials remained confident about the agency's ability to fully count the colonias, pointing to the hiring of more bilingual enumerators and the use of cultural facilitators to help census workers gain the trust of residents. They pleaded for patience and urged people to wait until the end of May for a visit before turning to the toll-free telephone response option.⁵⁰ By late May, the Dallas regional office told local leaders that they had counted more than 97 percent of Rio Grande Valley households, crediting a positive response from residents and assistance from community organizations. "We are very confident we will have an accurate count in the valley," Hector Moldonado, the Bureau's appointed high-level valley liaison, told the local newspaper.⁵¹ Mr. Moldonado also noted that the Bureau was still counting other valley

communities through the Nonresponse Follow-up operation and emphasized that continued cooperation in low mail-back areas was essential. While U/E operations officially ended on time in the colonias, Census officials agreed to revisit neighborhoods where residents reported they had not been counted.

* * *

The Education Fund believes the Census Bureau relied too heavily on historical practice and its own research in planning for enumeration of the colonias. The bureau failed to consult regularly with local advocates most familiar with the conditions and population of these areas and to consider thoroughly the use of a different counting method in light of those conditions. For example, local migrant worker advocates told The Education Fund that many farm workers leave their homes in the colonias by mid-April, looking for work in other parts of the country; entire families often migrate north, boarding up their homes or leaving rental units and pulling their children out of school. With the U/E process continuing throughout April and May, enumerators would likely miss many farm workers and their families during their door-to-door visits.

The Census Bureau's failure to adequately explain, well in advance, the alternative counting method planned for the colonias left the agency open to a widespread perception among national and community stakeholders that it viewed the residents of these unique settlements as less capable of participating in the census, and the communities as less important than others. In its April letter to Director Groves, for example, the CHC accused the bureau of being "inflexible in its efforts and methodology in the case of the heavily Hispanic U.S.-Mexico border, especially South Texas." Hispanic lawmakers pointed to operations and methods employed in various other communities across the country, such as mailed replacement questionnaires in low mail-response areas and a special, time-limited counting operation to reach homeless populations. Mike Seifert of the Equal Voice for America's Families network concluded that the decision not to mail census forms to most colonias households suggested that the Census Bureau did not "trust" residents to fill out the form.⁵² Another advocate for low-income and immigrant populations in the border region told funders that colonias residents were "insulted" by the decision not to mail questionnaires to their homes; they perceived the "different" treatment as an indication of "second class" status in the census process. "Involving the community upfront on this decision would have gone a long way," this advocate observed.

A large number of nonprofits with both regional and local portfolios were engaged in outreach and mobilization in the months leading up to the 2010 Census. The activities appear to have been well suited to conveying information about the importance of census participation and the confidentiality of census responses to people whose experiences and circumstances often made them distrustful and even fearful of government authorities. Through the colonias program at Texas A&M University, community outreach workers (*promotoras*) included information about the census in their routine outreach to households in the colonias. Program staff member Laura Trevino highlighted the importance of having familiar faces communicate census messages in these communities. “Trust is fundamental,” Ms. Trevino told the *Valley Morning Star*. Colonias residents “trust [the promotoras] because they’re not there episodically. They’re here on a consistent basis.”⁵³

Dozens of nonprofits in the border region, including many in the Rio Grande Valley, used a range of forums to educate residents about the importance and safety of census participation. Activities included partnering with school districts to distribute flyers to families with children; conducting outreach and offering questionnaire assistance at free tax preparation sites (Volunteer Income Tax Assistance program sites), job fairs, and emergency food distribution sites; posting easy-to-access information about the census on the websites of trusted, local organizations; and speaking

about the census at church services and distributing promotional materials through church publications. NALEO partnered with the extensive Frontera Building Asset Network (FBAN) to host a training session for advocates in hard-to-count areas who could help promote the census in their communities. FABN also reported that many recipients of its small grant awards used educational and graphic materials from The Education Fund’s Civilrights.org 2010 Census website and the NALEO-sponsored *ya es hora. HAGASE CONTAR!* campaign in their outreach activities.

Partnering with community groups and local institutions is an essential component of an accurate census in all hard-to-count areas. The colonias along the U.S.-Mexico border, and settlements that are home to farm workers in other parts of the country, present especially stark examples of the need to include these partners in planning and decision-making much earlier in the census process. The distinctive conditions and natural wariness of residents in these communities require hands-on assistance from local leaders and service providers who are uniquely positioned to advise the Census Bureau on counting challenges and to serve as “trusted voices” throughout the enumeration. The bureau must take steps to fully educate these indispensable partners about census plans and preparations throughout the decade and offer them reasonable opportunities to inform the planning process through various forums for sharing and exchanging ideas and knowledge.

VI. Recommendations

Based on this report's analysis of operations in three distinctly challenging areas, The Education Fund makes the following recommendations.

Policy Recommendations to Congress and the Census Bureau

- Congressional oversight committees with jurisdiction over the census should carefully review the experiences of community organizations along the Gulf Coast, in Mississippi, and in the colonias during 2010 census preparations and implementation, while advocates' memories are still relatively fresh, and catalogue obstacles and proposed solutions early in the planning process for the 2020 census. We believe a field hearing in one of these areas would offer a useful venue for such a review.
- Congress should carefully evaluate the final results of the 2010 census in the Gulf Coast region in light of continued population growth and other indicators of ongoing economic recovery, as well as the consequences of new and persistent barriers to recovery, in determining whether to fund a special Gulf Coast census in 2012 or 2013 under authority currently outlined in Title 13, United States Code. If federal funding decisions over the next decade are based on 2010 census data (or estimates derived from 2010 census data) while recovery and growth continue, public officials and agencies will not receive the resources they need and deserve to provide housing, education, health and transportation for hurricane-displaced people who continue their return home. Federal law allows communities experiencing unusually rapid growth to request special counts between censuses to make sure that funding flows more fairly. Under current law, municipal governments pay for those special censuses themselves. But given the unprecedented catastrophe caused, in large part, by extraordinary failures of federal preparedness and response to Hurricane Katrina, and ongoing difficulties with programs designed to help Gulf Coast communities rebuild, it would be fair and appropriate for Congress to consider a federally funded special census in the Gulf region.
- Congress and the Census Bureau should consider revisions to the Local Update of Census Addresses (LUCA) program that would give selected community-based organizations an opportunity to review preliminary address lists, and determine if such a modification would require a change in the relevant authorizing statute. For example, the Census Bureau could authorize the designated local agencies or officials responsible for LUCA in each participating jurisdiction to form review teams that include representatives of knowledgeable grassroots organizations. Community leaders participating in the LUCA process should be subject to the same strict confidentiality provisions of law as all other LUCA participants.
- The Education Fund strongly supports the Census Bureau's proposed new initiative — reflected in the Administration's Fiscal Year 2011 budget request — to update the Master Address File continuously throughout the decade, allowing the bureau to capture change in the nation's housing stock more effectively; to work closely with the U.S. Postal Service, and leverage other administrative sources, to document housing changes in real time; and to contain the cost of future censuses by mitigating the need for a massive canvassing operation a year before each enumeration.
- However, The Education Fund does *not* believe it is wise to remove the Master Address File from

the protection of 13 U.S.C., §9, which assures the confidentiality of all individually identifiable information the Census Bureau obtains in the course of taking a census. While addresses stripped of any data about the residents living therein might appear to be harmless and, indeed, already public information, the Census Bureau's Master Address File might contain addresses or housing units that are not known to local authorities or that violate local ordinances. Without the strict protection Title 13 offers against using personal and address information against any individual for any purpose, community advocates and local census coordinators might be reluctant to ensure that unauthorized or illegal living quarters are included in the census universe; residents or owners of those housing units might be more reluctant to participate in the census for fear of detection.

Operational Recommendations to the Census Bureau

- The Census Bureau should explain the cultural facilitator program more clearly and more widely to partner organizations in hard-to-count communities and should seek the assistance of partners in identifying individuals who could serve as facilitators if needed. As part of its 2010 census evaluation and 2020 census planning, the bureau should examine the effectiveness of this program, consult with stakeholders (especially at the local level) about the program's goals and parameters, and determine how best to improve the implementation of this strategy for 2020.
- The Census Bureau should examine its procedures for hiring bilingual field staff to ensure that employees assigned to work with or collect data from people whose primary language is not English are truly conversant in that language and perhaps even native speakers. Advocates working with Mississippi's immigrant communities, for example, were frustrated that field staff assigned to work in Latino neighborhoods did not speak Spanish well, suggesting that the Census Bureau's assessment of bilingual skills and cultural sensitivity during the hiring process was not sufficiently rigorous.
- In future decennial censuses, Partnership Specialists should begin their outreach to state and local organizations in the first quarter of the year

preceding the census year, to ensure adequate time for building trusted relationships and educating a wide range of stakeholders. Furthermore, a sufficient number of Partnership Specialists should remain in their positions during the Nonresponse Follow-up period, continuing their outreach to community organizations and answering questions about this second major census operation. The "disappearance" of Partnership Specialists at the end of the mail phase left many community partner organizations puzzled about where to turn for important information about the next phase of the count.

- The Census Bureau should explore the possibility of mailing replacement questionnaires to addresses in some or all Update/Leave areas. While the bureau has not completed evaluations of its inaugural replacement mailing in the 2010 census, evidence suggests that the second mailing to addresses in low-responding communities boosted mail-back rates considerably in many communities. The factors that contributed to a successful replacement program among households that initially received a form by mail but did not mail it back likely exist in many Update/Leave areas, as well. The significant cost savings associated with mail response might well tip the scale in favor of extending the replacement questionnaire operation to Update/Leave areas, even if the mail system is more problematic in some of these areas.
- The Census Bureau should examine thoroughly the conditions that determine the enumeration methods used in the colonias, farm worker encampments, and other rural settlements, and determine early in the decade if the bureau should employ a method or methods other than Update/Enumerate in these areas in the future. To help accomplish this goal, the Census Director should establish a task force or working group to advise the Census Bureau on issues related to the enumeration in these communities. The committee, which should include community-based advocates for migrant workers, farm workers, and residents of colonias, should carefully document the 2010 enumeration of these special populations; advise the bureau on research and testing that would help inform decisions about the 2020 enumeration; and work closely with bureau staff as they develop appropriate counting methods and outreach activities for the next census.

Appendix A

Recommendations from 2009 Report “Counting in the Wake of a Catastrophe: Challenges and Recommendations for the 2010 Census in the Gulf Coast Region”

A. Policy Recommendations for the U.S. Congress

- Congress should hold a field hearing in the Gulf Coast region as soon as possible to examine the barriers to achieving an accurate and fair census in the aftermath of Hurricane Katrina and to evaluate the steps being taken to overcome those obstacles.
- Congress should authorize a federally funded special census in 2012 or 2013 in designated Gulf Coast communities still recovering from Hurricane Katrina at the time of the 2010 census.

B. Operational Recommendations for Census officials

- Immediately appoint a senior level Gulf Coast census coordinator to oversee final preparations and

census operations in Gulf Coast communities still recovering from Hurricanes Katrina and Rita.

- Increase cooperation with the U.S. Postal Service, to ensure an inclusive address list at the time of the census.
- Seek assistance from the Mexican Mobile Consulate—and similar consulates from the home countries of Gulf Coast immigrants and migrant workers—in promoting census participation among these hard-to-count populations.
- Consider special advertising materials and strategies for the 2010 census in targeted Gulf Coast areas, designed to address the unique set of circumstances and concerns associated with Hurricane Katrina and its aftermath.
- Allocate additional personnel and fiscal resources, if necessary, to address greater-than-expected difficulties in conducting the census in the Gulf Coast region.

Appendix B:

May 18, 2010 Letter to Rep. William Lacy Clay from The Leadership Conference on Civil and Human Rights and Other National and Local Organizations

May 18, 2010

The Honorable Wm. Lacy Clay, Chairman
Subcommittee on Information Policy, Census,
and National Archives
Committee on Oversight and Government Reform
B-349C Rayburn House Office Building
Washington, DC 20515

Dear Chairman Clay:

As 2010 Census partners and advocates for communities that are historically hard to count, we are concerned about the U.S. Census Bureau's ability to achieve an accurate census in the Rio Grande Valley, in the Mississippi Delta area, and in Gulf Coast states still recovering from Hurricanes Katrina and Rita and facing renewed hardships in light of the recent devastating off-shore oil spill. We respectfully request you to consider holding a subcommittee field hearing in this region to examine our concerns about full coverage in hard-to-count areas, especially in low-income, Black, Latino, and Asian-American communities, as 2010 census door-to-door enumeration proceeds.

Our active involvement in promoting the 2010 Census allowed us to identify troubling operational deficiencies in the Gulf Coast and border regions that likely contributed to disappointing (and below-average) mail-in rates in Louisiana (64 percent), Mississippi (67 percent), and Texas (69 percent). Below we describe some of the difficulties we encountered during the first phase of the census.

Nonreceipt of Census Forms

Many people were eager to be counted but did not receive census forms (either by mail or hand-delivered)

and did not have easy access to assistance centers or knowledge of the telephone assistance lines. There were widespread reports of nonreceipt of census forms in the Greater New Orleans area, likely related to continued post-hurricane rebuilding, return migration, and the fact that many neighborhoods remain distressed. Parts of the Mississippi Delta region, including Tunica, Holmes, Sunflower, Grenada, and Webster counties, among others, also reported that residents did not receive forms.

Staffing Issues

Particularly in Mississippi, outreach to the growing post-hurricane migrant workforce and steady immigrant workforce in the seafood industry was hampered by an insufficient number of bilingual and culturally sensitive census staff. We also are concerned that in Tunica and other predominantly Black counties, the Census Bureau has not assigned enumerators who are both familiar with these communities and trusted by residents, to help ensure cooperation and thorough canvassing.

Problems in the Colonias

Inadequate communication with local service organizations and civic leaders in the Rio Grande Valley led to a complete misunderstanding of the enumeration process planned for the colonias along the Texas-Mexico border. Civic leaders have now established their own task force to help ensure comprehensive coverage of these unique communities, but serious concerns remain that thousands of migrant workers have already left their homes for the farming season and that the Census Bureau has underestimated the vast spread of housing units in the valley. We applaud the Census Bureau's efforts in dispatching a liaison from the national office to work specifically with the local community-based organizations. The current response of the bureau in the

colonias is an excellent example of what needs to be done in other areas of the Gulf facing similar problems.

These concerns were brought to the Census Bureau's attention at several points during early census operations. Senior officials at Census headquarters and in the Dallas Regional Census Office have listened to our observations and have taken steps to address some of our concerns and to work more closely with community advocates. We appreciate these efforts, but we remain greatly concerned that many households, and even entire neighborhoods in both urban and rural communities, will be missed during Nonresponse Follow-up (NRFU) and U/E operations in the colonias, both because of significant gaps in the Census Bureau's Master Address File and because census takers may find it difficult to navigate unsafe and unmarked streets to reach all households and to determine correctly the occupancy status of many structures.

As you know, on May 1, the Census Bureau began the NRFU operation, which is, by definition, the most difficult phase of the census, with enumerators striving to collect information from households that did not mail back their forms. We are aware that some of these nonresponders chose not to cooperate, perhaps because they do not understand the benefits that flow from the census or because they distrust the federal government and are concerned about the confidentiality of their personal information. At the same time, we believe there are a number of individuals who are eager to participate in the census, but because of the challenges identified above, were not able to do so during the first phase.

An accurate census is essential to all communities, but its importance is magnified in Gulf Coast neighborhoods still recovering from the 2005 and subsequent storms and in low-income rural communities. An analysis by the Brookings Institution showed that in Fiscal Year 2008, Louisiana received \$8.9 billion, Mississippi received \$5.6 billion, and Texas received \$31 billion in federal funds for a wide range of critical programs and services, based in whole or in part on census data. Our communities desperately need federal support to both rebuild and strengthen our transportation, education, housing, health care, and public safety infrastructure, as well as to ensure fair political representation for all populations. The persistent and disproportionate undercount of people of color magnifies the harmful consequences of an inaccurate count, depriving the communities most in need of their fair share of funding tied to the census.

The Census Bureau can only overcome the many barriers to participation by working closely and

collaboratively with community organizations that are knowledgeable about hard-to-count neighborhoods and are trusted by residents. We remain committed to working with the Census Bureau to ensure effective outreach and promotion strategies and a clear understanding of procedures during this phase of the count. We would welcome the opportunity to share our concerns and propose solutions at a congressional oversight hearing.

Thank you for your time and consideration. Please feel free to contact Marilyn Young, Concerned Citizens For A Better Tunica County, Inc. at 662-541-5333 or marmelmarilyn@gmi.net to discuss our request further.

Sincerely,

[the undersigned organizations]

LOUISIANA

Louisiana Justice Center
Moving Forward Gulf Coast
New Orleans Worker Center for Racial Justice
Puentes

MISSISSIPPI

Boat People SOS
Coastal Women for Change
Concerned Citizens For A Better Tunica County, Inc.
East Biloxi Complete Count Committee
Hope CDA
Mercy Housing & Human Development
MIRA
Mississippi NAACP
MS Gulf Coast Vietnamese Complete Count Committee
Southern Echo Inc.
Steps Coalition
Sunflower County Parents and Students Organization

TEXAS

ARISE
Frontera Asset Building Network
Judge Carlos Cascos, Cameron County, Texas
La Union del Pueblo Entero (LUPE)
Migrant Health Promotion
Proyecto Azteca

Proyecto Juan Diego
South Texas Adult Resource and
Training Center (START)
Southwest Workers' Union
Texas KIDS COUNT

NATIONAL ORGANIZATIONS

The Leadership Conference on Civil and Human Rights
Asian American Justice Center
NALEO Educational Fund
NAACP
National Congress of American Indians

cc: Hon. Patrick McHenry, Ranking
Member, Subcommittee on Information
Policy, Census, and National Archives
Hon. Edolphus Towns, Chairman, Committee
on Oversight and Government Reform
Hon. Darrell Issa, Ranking Member,
Committee on Oversight and Government
Louisiana congressional delegation
Mississippi congressional delegation
Texas congressional delegation
Marc H. Morial, Chairman, 2010
Census Advisory Committee

Endnotes

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1. The Census Bureau calculated and published participation rates for all areas that received census forms either by mail (Mail-out/Mail-back) or hand delivery (Update/Leave); there are no participation rates for most of the colonias, which largely were covered by a third method, Update/Enumerate. All three methods are described more fully in the body of this report.
 2. "Counting for Dollars; States and District of Columbia," Brookings Institution Metropolitan Policy Project, accessed at www.brookings.edu/metro/census_states.aspx.
 3. "Counting for Dollars: 100 Largest Metropolitan Areas," Brookings Institution Metropolitan Policy Project, accessed at www.brookings.edu/metro/census_100_metros.aspx.
 4. Krupa, Michelle, "Nagin advice breaks census rules," New Orleans *The Times Picayune*, July 11, 2009.
 5. "Counting for Dollars: States and District of Columbia," Brookings Institution Metropolitan Policy Project, accessed at http://www.brookings.edu/metro/census_states.aspx.
 6. "Counting in the Wake of a Catastrophe: Challenges and Recommendations for the 2010 Census in the Gulf Coast Region," The Leadership Conference Education Fund, August 2009.
 7. Groves, Robert. Letter to Wade Henderson and Karen Lawson, September 8, 2009.
 8. "Civil Rights Coalition Releases Report Highlighting Unique Census 2010 Challenges Four Years After Hurricanes Katrina and Rita," Press Release, The Leadership Conference For Civil and Human Rights, August 24, 2009, accessed at <http://www.civilrights.org/press/2009/civil-rights-coalition-1.html>.
 9. "30 Days Out from 2010 Census: Civil Rights Community Calls for Full Participation," posted on March 1, 2010, accessed at <http://www.civilrights.org/archives/2010/03/30-days-census.html>.
 10. "Civil Rights Groups Urge Congress to Address Low Census Response Rates in Gulf Coast, Mississippi Delta, and Texas Regions," press release, The Leadership Conference on Civil and Human Rights, May 18, 2010, accessed at <http://www.civilrights.org/press/2010/civil-rights-census-gulf.html>.
 11. O'Hare, William and Edwin Quiambo, Analysis of U.S. Census Bureau Tract-Level Planning Database with Census 2000 Data, based on "hard to count" scores of 60 or higher, The Annie E. Casey Foundation, April 2009.
 12. *Ibid.*
 13. Federal Emergency Management Agency website section on 2005 disaster declarations. Accessed at www.fema.gov/news/disasters.fema?year=2005. See Katrina declarations for designated states and counties.

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14. State of Metropolitan America: New Orleans, LA Metro Area fact sheet, Brookings Metropolitan Policy Program analysis of Census 200, U.S. Census Bureau Population Estimates Program, and 2008 American Community Survey data.
 15. “Census tally of New Orleans addresses nearly matches locals’ count,” *The Times-Picayune*, December 15, 2009.
 16. Other active local partners in Louisiana’s Gulf Coast included Voice of the Ex-Offender, National Urban League, Puentas, Neighborhood Partnership Network, Vietnamese American Youth of Louisiana-New Orleans, and Mary Queen of Viet Nam Community Development Corporation. Partners in coastal Mississippi included Coastal Women for Change, NAACP-Biloxi, and Life Sowers Community Development Corporation.
 17. The Census Bureau published two sets of participation rates — initial and final. The initial rate reflected the percent of households that returned a census form by mail through April 27, 2010. The final rate included “late” mail returns received through September 6, 2010. Both the initial national participation rate (72 percent) and final national participation rate (74 percent) equaled the 2000 census participation rates. However, the cut-off date for the 2000 census initial participation rates was April 18, 2000, reflecting timing differences in census operations between the two enumerations. The Census Bureau included all addresses from which it did not receive a questionnaire by the cut-off date in the universe of households that census takers would visit, even if the household mailed back the form after the cut-off date. Because “late mail returns” did not reduce the cost, scope, and difficulty of the Nonresponse Follow-up operation, and because the different cut-off dates for the mail-back phase made the final participation rates less comparable than the initial rates, The Education Fund believes it is more useful to evaluate initial participation rates in discussing the effectiveness of census operations in the Gulf Coast.
 18. The Census Bureau did not calculate participation rates for U/E areas, where the count was conducted entirely door-to-door. A fuller explanation of this method is given in the section of this report on the Texas colonias.
 19. “Katrina’s Impact On New Orleans’ Population,” *National Public Radio*, Washington, D.C., August 24, 2010.
 20. All rankings include the District of Columbia and are based on 2009 American Community Survey data.
 21. The Education Fund’s leading community-based census partners in Mississippi included Concerned Citizens for a Better Tunica County, Inc.; BPSOS, an advocacy organization for Vietnamese Americans; Southern Echo, a leadership development and education organization primarily serving the African-American community; and the Mississippi Immigrant Rights Alliance.
 22. Analysis by Dr. William O’Hare, Senior Fellow, The Annie E. Casey Foundation, for the Funders Census Initiative, using 2000 census population data and defining hard-to-count areas as those with a score of 60 or above.
 23. U.S. Department of Commerce, Office of Inspector General, OIG Flash Report, Census 2010: Observations and Address Listers’ Reports Provide Serious Indications That Important Address Canvassing Procedures Are Not Being Followed, OIG-19636-01, May 2009.
 24. “Counting in the Wake of Catastrophe”, p. 19.
 25. Letter from Concerned Citizens For a Better Tunica County, Inc. to the Southhaven Local Census Office in Horn Lake, MS, April 10, 2010.
 26. Immigrants rights advocates praised the efforts of the native Spanish-speaking partnership specialist, but reported that other partnership specialists or assistants assigned to the Latino community were not native speakers and had difficulty communicating well with immigrants who did not speak English. Their concerns extended to enumerators in predominantly Latino neighborhoods who were not native speakers.
 27. To comply with provisions of the Immigration Reform and Control Act of 1986, all U.S. employers must verify the employment eligibility and identity of all employees hired to work, including both citizens and non-
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- citizens. Employees must complete the I-9 form and show acceptable documentation of their eligibility to work in the United States.
28. The national participation rate as of April 27, 2010, the end of the mail phase of the census, was 72 percent.
 29. Schaefer, Ward, "Census Director Stresses Cultural Sensitivity," *Jackson Free Press*, June 4, 2010.
 30. The full video is posted at http://www.movingforwardgc.org/census_advocacy.php.
 31. The results of the 2010 midterm elections shifted control of committees in the U.S. House of Representatives to the Republican party, giving Republicans far more say in setting the agenda for hearings and investigations in the 112th Congress.
 32. De la Puente, Manuel, and David Stemper, "The Enumeration of Colonias in Census 2000: Perspectives of Ethnographers and Census Enumerators," U.S. Census Bureau, Statistical Research Division, September 22, 2003, p. 1. (<http://www.census.gov/pred/www/rpts/J.4.pdf>).
 33. "Colonias: Frequently Asked Questions," Texas Secretary of State, <http://www.sos.state.tx.us/border/colonias/faqs.shtml>.
 34. See, in general, *ibid*. This evaluation relied on ethnographic studies and focus groups and covered four colonias spread across California, New Mexico, and Texas; the authors acknowledge that the chosen sites were not intended to be statistically representative of all colonias.
 35. *Ibid*, p. ii.
 36. *Ibid*, pp. 21–22.
 37. Weber, Paul J., "Census chief tries easing immigrant fears in Texas," *The Associated Press*, February 1, 2010
 38. The Annie E. Casey Foundation funded Frontera Asset Building Network's Census 2010 Initiative.
 39. The Census Bureau used three primary enumeration methods in 2010; it employed the same methods in 2000. "Mail-out/mail-back" covers most of the country; census forms are mailed to residential addresses, and residents mail them back. "Update/Leave" is used in rural and other communities without traditional city-style addressing; census workers hand-deliver (e.g. leave) census forms to residential addresses and update the address list and maps as they go, to help ensure full coverage and correct geographic location of homes.
 40. Seifert, Mike, "Census Bureau's New Policy Demeaning to Colonia Residents," *Rio Grande Guardian*, April 2, 2010.
 41. Jones, Jared, "Census Bureau's counting procedure for colonias frustrates some," *The Monitor*, April 8, 2010.
 42. "Judge concerned about colonia Census count," *Valley Morning Star*, April 4, 2010.
 43. "Border Congressman Calls For a Colonia Census Task Force," *Rio Grande Guardian* online, April 2, 2010.
 44. *Ibid*.
 45. Education Fund staff suggested civic leaders and community organizations in the Valley area to include in meetings with Dallas Regional Census Office officials.
 46. The NALEO Educational Fund is a member of the Census Bureau's 2010 Census Advisory Committee.
 47. The Census Bureau reported that Director Groves visited the Rio Grande Valley more than any other community in the nation during the 2010 census.
 48. "Census director visits Starr County as questionnaire mailback period ends," *Monitor* (Naples, TX), April 19, 2010.
 49. Be Counted sites and Questionnaire Assistance Centers were scheduled to close nationwide on April 19. These sites were not available in U/E areas because enumerators are

responsible for answering questions about the census as they go door-to-door.

50. “Nonprofit Groups Fear Census Undercounting in Colonias,” *KRGV Channel 5 News* online, April 27, 2010.
51. “97.4 Percent Census Participation Rate in Valley Under U/E,” *Rio Grande Guardian*, May 25, 2010.
52. Seifert, Mike, “Census Bureau’s New Policy Demeaning to Colonia Residents,” *Rio Grande Guardian*, April 2, 2010.
53. “Community outreach groups promote Census in colonias,” *Valley Morning Star*, April 13, 2010.

Notes

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