November 14, 2022

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

RE: Docket Number USBC-2022-0004; Stakeholder engagement on development and implementation strategies that improve the way people participate in the 2030 Census

Dear Ms. Wink:

As Illinois’ only statewide association representing foundations, nonprofits, and advisors, Forefront played a key role in Census 2020 statewide as a funder and convener and is pleased to submit comments related to improving participation in the 2030 Census. Forefront and our allies spearheaded “Illinois Count Me In” in 2017-2020, which was a robust public-private partnership among local and national nonprofits, foundations, government agencies, faith-based organizations, businesses, and elected officials. Through collective action, digital engagement, and steadfast community leadership in the face of a global pandemic, the efforts of ILCMI 2020 resulted in Illinois’ highest national ranking in self-response in a generation. Most recently, Forefront co-hosted the 2030 Census Recommendations Workshop in Chicago with Bureau officials, and we hope to continue partnering as we approach 2030. Additionally, our stakeholders remain engaged; 45% respondents to our November 2022 policy survey identified the 2030 Census as a top federal policy priority.

Looking to 2030, we offer the following recommendations to ensure we more effectively reach historically undercounted communities in 2030.

A. Reaching and motivating everyone:
   • Start earlier. We should be staffing up federal, state, and local stakeholders, and building a range of funding sources, for Census 2030 by 2024-2025.
   • All funders should be transparent about funding streams (who gets what, for what, where, etc.). Eliminate competition by encouraging partnerships and de-emphasizing the need to tally specific numbers of people reached. This discourages partnerships at events where there might be overlap and incentivizes isolated action.
   • Show communities between now and 2030 how they benefit from Census counts. Give clear examples of visible projects for which the funding is derived from Census counts.
   • Maintain consistent engagement between the Bureau and community partners to facilitate real-time troubleshooting and to build trust. Being generally consistent and intentional with relationships and methods is vital; the lack of consistency and intentionality frustrated our 2020 partners.
   • Use “useful” swag (if any). Popular items included reusable shopping bags, reusable straws; unpopular items included stickers, water bottles. Only spend money on things that people need and use.
   • Increase LGBTQIA+ outreach. This was lacking in 2020.
   • Include non-binary gender identity option(s) on Census form.
   • Focus on the “why.”
B. Technology:
- Invest heavily in scaling internet access to rural areas and other unserved areas before 2030.

C. New data sources:
- Explore sources like municipal water records, school district household information, within privacy limits, as sources of information from which to build pre-populated data bases that help communities start off ahead with some households pre-counted. Do we need to start from zero for Census counts, when local records abound?
- Modify the residence criteria to count incarcerated persons in their home communities instead of at the prison facility. Most prison sentences are less than the 10 years that the Census count will impact communities, and incarcerated people generally stay connected with their home communities, rather than the areas that house their prison facility. While Black and Latino communities are disadvantaged by this policy due to disproportionate incarceration rates for communities of color pulling population out of their areas, the largely rural, white communities where prisons are located benefit from additional resources and representation. Black and Latino communities are already underrepresented due to undercounts and systemic oppression across our country, and this creates additional discrimination against communities of color.
- Improve disaggregated (highly localized) undercount data reporting to community partners to help target outreach efforts in real time. Reporting undercounts only at the state level is less helpful.
- Implement the recommendations in the March 4, 2022 letter to OMB Director Young and OIRA Administrator Mancini to improve the quality of race and ethnicity data collected by the Census Bureau and the federal government in general. This includes the use of a combined question versus separate questions to measure race and ethnicity and the classification of a Middle Eastern and North African (MENA) group and distinct ethnic reporting category, among others.
- Allow use of alternative addresses like PO Boxes and Rural Routes.
- Partner with municipal GIS to show economic indicators in regions

D. How we contact respondents:
- Use messaging that promotes unity, collaboration, using one’s own voice, and community. Messaging is most effective when shared by trusted messengers and is consistent across channels and sources. Include and refer to crucial issues facing our nation, state, and municipalities, and link Census participation concretely to local funding, political representation, and community empowerment.
- Pair traditional forms of organizing and communication with a complementary and consistent strategy that includes social media, training resources, toolkits, infographics, and multimedia content.
- Study which methods work by pairing outreach with academic research in real time, and disseminate results quickly so folks can adapt immediately and use funds in the most effective way possible.
- Hire more bilingual workers.
- Make more materials available in more languages.
- Don’t rely only on traditional/mainstream media. Ethic and local media is often more trusted.
• Use popular apps like Tik Tok. (There may be a “new Tik Tok” by 2030. Adapt!)
• Rely on trusted local leaders and scale partnerships with trusted local community groups/organizations.
• Offer Census form filling helpers for seniors or immigrant households at cultural community events

E. **Respondent support services:**
• Create alternatives to online self-response.
• Improve phone response times. For people that prefer this method, waiting is discouraging.
• Use both fixed and mobile questionnaire assistance centers.

Thank you for the invitation to share comments. We look forward to our continued work together to ensure a fair and accurate 2030 Census.