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CALIFORNIA RURAL LEGAL ASSISTANCE, INC.
Information Policy, Census and National Archives Subcommittee
Of the Oversight and Government Reform Committee
“The 2010 Census Master Address File: Issues and Concerns”

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2154 Rayburn House Office Building

Mr. Chairman, Ranking Member and Members of the Subcommittee,

Thank you for your invitation to reflect my assessment and review of the quality and quantity of the addresses the Census Bureau will use to mail out census forms next spring and to provide my opinion on the Census Bureau’s efforts to capture addresses in rural communities, including address canvassing, LUCA and other methods to insure that the Bureau has the most accurate mailing list possible.

I am a Director of Litigation, Advocacy & Training for California Rural Legal Assistance, Inc. (CRLA), a statewide non-profit law legal services program that provides legal assistance and a variety of community education and outreach services annually to more than 40,000 low income Californians, many of whom represent the hardest to count populations in the Decennial Census. They include low-income rural families, recent immigrants, linguistically isolated groups, diverse racial and ethnic groups, school children, disabled persons, migrant and seasonal farm workers, single parents, renters, and the elderly. CRLA’s mission is to ameliorate rural poverty and ensure that rural communities have access to justice and the provision of basic human rights. Census data and improving the differential undercount of hard to count populations are key to that mission when they accurately reflect the individual and communities we represent, thus, I also serve as our representative to the 2010 Census Advisory Committee and have served on Decennial Census Advisory Committees since CRLA’s appointment in 1995.

This prepared statement provides comments related to Master Address File (MAF) quality and reflections on practical strategies for improving the MAF as part of ongoing census improvement. The Census Bureau has made a great deal of progress in preparing the MAF and developing methods to address differential undercount, but much more remains to be done in our collective efforts to assure that the census truly is “a mirror which reflects America”. My remarks stem from a long and enjoyable period of time working with local community groups and Census Bureau staff to improve the decennial census and reflect a shared concern for

accurate census data as an essential tool for sound, evidence-based social and economic planning, allocation of program funding, community development and enforcement of fundamental rights. I have provided legal assistance to the underrepresented and exploited throughout my legal career so my concern about accurate census data is a necessary one. I also have focused on housing issues throughout my entire career —so my concern about the Master Address File is a natural one. I have worked with CRLA since 1986 (after working for several years with the National Housing Law Project and Legal Aid Bureau) when I came to California to focus on issues of housing for migrant and seasonal farmworkers and other rural Californians. The prevalence of crowded and sub-standard farmworker housing, the importance of census data for allocation of federal housing funds, as well as for public health, education, and social program funding, lead to my concerns about a more accurate census.

I began working with community based organizations, researchers, and Census Bureau staff in joint efforts to improve census enumeration of hard-to-count groups during the 1990 Decennial Census.

Types of Housing Associated with Inaccuracies in the Master Address File

My direct experience with issues related to the accuracy of the Master Address File (MAF) stems from CRLA's community education and outreach and representation of migrant and seasonal farmworker (MSFW) clients and other rural residents throughout California. MSFWs in our state, and throughout the country, typically live in crowded, sub-standard, marginal housing accommodations. My experience is consistent with the Census Bureau's own research and field experience in showing clearly that the most serious MAF problems arise when housing units are "hidden" or "low-visibility" or fall into the category of "unusual" or "unconventional" dwellings. Many of these housing units are not in the MAF because they are actively concealed, but many others do not appear on postal or commercial address lists simply because they are sub-standard, low-profile housing.

Some farmworker housing is disregarded, ignored or actively hidden because the accommodations are not fit for human habitation: garages, toolsheds, camper shells, travel trailers, barns, chicken coops, plywood "back houses" built behind a main house in *colonias* and farmworker *barrios* in rural towns across the country, shantytowns of shacks made of cardboard containers in San Diego County, gatherings of trees and tarps in onion fields, or open-air encampments in California cherry orchards, cottonwood groves along the Fresno River, or orange groves in southern Arizona, old motels with 20 workers in a room, trailer parks and campgrounds with areas set aside for migrant workers. Some housing is actively hidden as a way to control the workers who live in it. Farmworkers were held in conditions of indentured servitude in December 2008 in Florida, for example, housed in U-Haul trailers parked on a back road adjacent to a nature sanctuary. Asparagus cutters were housed from 1997-2000 by a farm

labor contractor in an isolated labor camp on one of the islands in California's Sacramento River delta.

There are many other cases, however, in rural areas and urbanized agricultural communities, where the housing units in which farmworkers and their families reside are similar to other "hidden" and substandard, exploitative housing. The dwellings might be considered basically liveable, but they do not conform to codes, standards or local zoning ordinances, for example, a room in an illegally sub-divided single-family home (actually a housing unit under Census definitions when it has a separate entrance). There are other circumstances in which housing where farmworkers live are legally permitted, i.e., low-income trailer parks or clusters of trailers along rural roads in agricultural areas, but they do not have mail delivery even when the area is one designated by the Census Bureau for mailout-mailback delivery of census forms. One of the 1990 ethnographic case studies of differential undercount sponsored by the Census Bureau's Center for Survey Methods Research (Montoya 1992) found farmworkers housed barracks-style in a local motel where rooms did not have individual mail addresses and it was not identified as "group quarters"; such motels, usually dilapidated, are quite common throughout California.¹

The deplorable conditions of farmworker housing present an extreme case of MAF problems. The housing is neither identified as a housing unit or as group quarters, yet is often located in a mail-out/mail-back area, virtually guaranteed to be missed unless other enumeration special procedures or "toolkit" approaches are used. The housing conditions of most recent immigrants to the U.S. are similar, however, as the typically low-wage workers are striving to make ends meet by living in crowded and dilapidated "unconventional" housing conditions in both rural and urban communities. This results in similar patterns where extreme low-visibility housing units do not have postal addresses, are missed in routine Census Bureau canvassing, and in many cases unknown or only vaguely known by local municipal officials. It is also worthy of note that this type of housing also is often occupied by large or complex households, making it likely that missing the housing further exacerbates the differential undercount of racial and ethnic minorities. Anti-immigrant sentiment and ordinances in some communities also can mean that both recent and settled immigrants are likely to "hunker down" and seek to minimize their social visibility.

The Census Bureau has made numerous improvements in address canvassing in an effort to include these low visibility units, through improved training, instructions and job aids for hard to locate units, however, much work remains to be done to ensure that census forms are delivered to these hidden housing units, that the forms are delivered even if they are not mailed, and that the

¹ Martin Dale Montoya, "Ethnographic Evaluation of the Behavioral Causes of Undercount: Woodburn, Oregon", Report #25, Ethnographic Evaluation of the 1990 Decennial Census Report Series, Center for Survey Methods Research, Bureau of the Census, 1992.

complex households residing in these units are enumerated and accurately reflected in census data. We have worked in particular with the Los Angeles region in their efforts to identify hard to locate housing and areas in which these units are concentrated and to improve the undercount in these areas and are aware of similar work in other regions, but there must be a consistent and concentrated approach to improvement in reaching these hidden housing units not only in address canvassing operations, but throughout all decennial operations; and the approach needs to be carried over to the American Community Survey (ACS), the Census Bureau's replacement for the long form.

The Extent and Consequences of Master Address File Inaccuracies

Farm labor researchers Susan Gabbard, Edward Kissam, and Phillip Martin, used multiple methods in 1993 to determine the extent and causes of farmworker undercount in the 1990 census.² They used the best available models of causes of census undercount and independently-collected data from the National Agricultural Worker Survey (NAWS) to estimate a 1990 undercount of 48-52% of the overall MSFW population³; the largest component of the undercount by far was due to total household omission (40-43%) although there was an additional component of undercount (8-9%) due to partial household omissions.

CRLA conducted field research using the ethnographic coverage measurement procedures which had been developed by the Census Bureau and its researchers in 2000⁴ to assess the extent to which undercount of migrant and seasonal farmworkers persisted, despite our own education and outreach efforts, energetic Census Bureau efforts, and a substantial state-funded initiative to enhance enumeration.⁵ The research, in seven farmworker case study communities, showed that from 6.4% to 27.6% of local residents in farmworker neighborhoods (all in mailout-mailback

² Susan Gabbard, Edward Kissam, and Philip L. Martin, "The Impact of Migrant Travel Patterns on the Undercount of Hispanic Farmworkers", Proceedings of the 1993 Research Conference on Undercounted Ethnic Populations, Bureau of the Census, Economics and Statistics Administration, U.S. Department of Commerce, October, 1993.

³ David Fein, "The Social Sources of Census Omission: Racial and Ethnic Differences in Recent U.S. Censuses", Ph.D. dissertation, Department of Sociology, Princeton University, 1989. Fein's modeling was based on well-designed Census Bureau research, the Cause of Undercount Survey, essentially a triple-enumeration conducted in conjunction with the 1986 Los Angeles Test Census. Edward Kissam, CRLA census research partner, and I have stressed for many years that the operational causes of differential undercount are structurally similar in urban and rural areas, but play out differently because socioeconomic and housing conditions differ.

⁴ The funds for the project were provided by The California Endowment.

⁵ It is very important to recognize that most migrant and seasonal farmworkers in the United States do not live on farms and that many, particularly in California, live in areas with city-style addresses. Most of these areas are routinely designated as mail-out/mail-back areas for census form delivery. See Housing Assistance Council (2005) and various tabulations and reports from the National Agricultural Worker Survey.

areas) lived in a household that was totally omitted from census enumeration, an average of 14.2% of the population in the study areas.⁶

We could not definitively attribute total household omission to MAF deficiencies (since we did not have access to the MAF) and some of these enumeration errors probably stemmed from problems with non-response follow-up (NRFU), however, it is important to note that total household omission in these rural towns was well-correlated with community housing patterns, i.e., highest in Parlier, where farm labor researchers had documented high proportions of non-conforming “back houses” and lowest in Arvin, a very coherent community.⁷ The California Institute for Rural Studies (CIRS) Parlier survey in the early 1990s had found that 22.2% of the survey respondents were living in “back houses”, very close to the 27.6% that the CRLA research team found in 2000 to have resided in a totally-omitted households.⁸

The underlying causes of MAF omissions are the result of interactions between the prevailing social system in a community and census operations (including LUCA), which make certain types of housing units and households invisible or semi-visible. A serious consequence is that a flawed MAF always gives rise to bias in the subsequent survey-based demographic and socioeconomic profile of the population. The types of housing units that are not included in the MAF typically are more crowded ones; therefore the errors in the resulting enumeration are even greater than the underlying errors in the MAF. The meticulous CIRS analysis of Parlier housing showed that 16% of the housing units in the community were “back houses”, but that 22% of the town’s population lived in these low-visibility housing units. The reflection of the population in census data will be skewed if these units are missed in the MAF and not

⁶ Edward Kissam and Ilene Jacobs, “Census 2000 Undercount of Immigrants and Farmworkers in Rural California Communities”, CRLA Report to The California Endowment, August, 2001. Our findings are further discussed in Edward Kissam and Ilene J. Jacobs, “Practical Research Strategies for Mexican Indigenous Communities in California Seeking to Assert Their Own Identity” in Jonathan Fox and Gaspar Rivera-Salgado, **Indigenous Mexican Migrants in the United States**, Center for U.S. Mexican Studies and Center for Comparative Immigration Studies, University of California, San Diego, 2004.

⁷ Much of the data on Parlier housing stems from field research conducted by Anna Garcia in 1989 for the U.S. Department of Labor (discussed in Chapter 9, “Northward out of Mexico: Migration Networks and Farm Labor Supply in Parlier, California” in David Griffith and Ed Kissam, **Working Poor: Farmworkers in the United States**, Temple University Press, 1995. Additional data stems from field research led by Anna Garcia as part of a subsequent study on farmworker health conducted by the California Institute of Rural Studies (Jennifer Sherman, Don Villarejo, Anna Garcia et al, “Finding Invisible Farmworkers: The Parlier Survey”, CIRS, 1997.

⁸ It is important to note that the CIRS Parlier Survey used “best practices” in farm labor household survey research which included complete on-the-ground mapping of community households—techniques similar to Census Bureau address canvassing but relying on field researchers trained in ethnographic research methods. These methods have, subsequently, been used in several leading farmworker research studies, most notably the community health research in 2003-2004 conducted by Richard Mines for the California Endowment’s Agricultural Worker Health Initiative.

enumerated. Numerous studies of farmworkers and other immigrant populations have documented that the individuals and families living in the housing units at highest risk of being excluded from the MAF are more often foreign-born, have lower educational attainment, are more likely to be ethnic and linguistic minorities (e.g. in rural California, immigrants of Mixtec, Triqui, Maya, Zapotec, Purepecha origin), live in extreme poverty, and be very limited in English. The 2010 MAF will “ripple forward” into the household sample for the American Community Survey, thus setting the stage for skewing a multitude of socioeconomic and demographic characteristics if the Bureau does not take full advantage of this opportunity for improving the MAF. MAF errors are the first stage in a cycle in which social and economic disadvantage lead to social invisibility, subsequently reinforced by structural bias in the census, and, finally, amplified by inequitable access to federal, state, and locally-funded education, health, community development and social programs (including affordable housing) since funding allocation formulas are driven by census data.

Recommendations for Improvements to the Quality of the MAF

The Census Bureau has taken some important steps forward toward improving the MAF in the past decade, but more can be done to assure the quality and integrity of the decennial census. I will now briefly discuss some operational improvements to improve the MAF. My background and the focus in my remarks relates to enumeration of migrant and seasonal farmworkers, but there can be no doubt that similar initiatives will bear fruit in enhancing the enumeration of other hard-to-count populations, in both rural and in urban areas.

“Best Practices” for Address Canvassing: Enhanced, Ongoing Identification of Low-Visibility Housing Units

The GAO conducted a study and issued a report in 2003 that confirmed the utility of the efforts undertaken by CRLA and the Los Angeles and Seattle Regional offices to improve the MAF.⁹ The GAO reported that our partnership identified more than 4,000 low-visibility housing units we believed were not included in the MAF; the Bureau reviewed and accepted 3,076 of these (more than 75%) as new additions.¹⁰ CRLA hopes to pursue a similar strategy for 2010, working closely with the regional Census Bureau managers and their staff. I am confident that similar partnerships, formally established, would be valuable in other areas of California and the country. We found that the key to making this effort cost-effective was to provide high-quality training about the types of housing likely to have been omitted from the MAF to grassroots-level community workers who knew their local communities intimately and could work in partnership

⁹ Report GAO-03-605, “Decennial Census: Lessons Learned for Locating and Counting Migrant and Seasonal Farmworkers”, July, 2003.

¹⁰ p. 20, GAO-03-605

with the Census Bureau. This made it possible for us to avoid wasting Census Bureau staff time with housing units that already were in the MAF. These address listing protocols need to be in place immediately and must be in operation throughout NRFU in order to be effective for enumeration of hard to locate housing units in rural and urban areas. The Census Bureau now has adopted similar protocols for its 2010 Targeted Non-Sheltered Outdoor Locations (TNSOL) enumeration, however, the operation is severely limited in scope because it is an essentially one day operation designed only to reach locations and service providers for the homeless.

Adequate training for Census Bureau staff assigned to address canvassing operations is an important part of “best practices”, and again should be incorporated in all census operations so that addresses are identified, added to the MAF and enumerated throughout NRFU. The result of the GAO report and work by CRLA and the advisory committee resulted in the Census Bureau’s development of a sound orientation manual on identifying housing units where MSFWs live. It is not clear that this manual is routinely or extensively used, or to what extent regional and local census office procedures, budgets, and timelines might adversely or positively affect the resulting address canvassing procedures.

Address canvassing has been limited to a time frame ending well before the Census is conducted, nevertheless, it should be feasible for Census Bureau regional offices to modify operational procedures to allow for ongoing improvement to the MAF (involving work with community based census partners, local municipal and county agencies, as well as Census Bureau staff), much farther along in the enumeration processes, including NRFU.¹¹

A commitment to continuous MAF improvement, based on extended address canvassing, as well as expanded reliance on community partnerships in support of MAF improvement also will benefit from Census Bureau commitment to improve related skills of local census office (LCO) employees involved in canvassing and NRFU. Current Census Bureau procedures allowing hires of cultural facilitators in areas with concentrations of hard-to-count populations are an important first step, but more work will need to be done in defining the job skills needed, which often relate more to communication skills, cultural competency, language competency, analytic thinking and teamwork, than to educational attainment. It will be particularly useful to work hard to recruit and hire immigrants themselves (both those with work authorization who are not citizens and those who are naturalized citizens). We have worked with the Seattle and Los Angeles regional efforts in this arena and know that the recruitment/hiring tasks are challenging ones, but this is

¹¹ This might yield cost-savings and improved enumeration quality, particularly with respect to correctly tabulating Be Counted forms. A worrisome problem is that a valid report of a household reported on a Be Counted form will fail edit and be deleted because the housing unit is not in the MAF or cannot be easily found. We will work to assure that Be Counted forms meet validation requirements, but it is probably more cost-effective to develop procedures to include newly-discovered housing units in the MAF immediately, throughout NRFU. We also are concerned that NRFU is accomplished primarily by telephone.

all the more reason for Census Bureau attention to increasing local staffing diversity for MAF improvement in HTC tracts because this operation, perhaps even more than NRFU, requires Census Bureau staff to be able to establish trust in interaction with individual households.

MAF Improvement Using Targeted Update-Enumerate Procedures

The Census Bureau should target areas of high concentration of hidden or hard to locate housing units for special enumeration procedures. The census regional offices and community based partners are essential to these improvements and could prove invaluable for an accurate MAF and reducing the differential undercount. This would include targeting additional areas for update/list, update/leave or update/enumerate type operations, in addition to implementing special protocols described above for adding to the address list.

The Census Bureau secured expert technical support in 1999 to identify the major concentrations of migrant and seasonal farmworkers (MSFWs) in the country and used the analyses to guide targeted initiatives using enhanced enumeration procedures (including identification of low-visibility MSFW housing) in order to decrease the differential undercount of MSFWs. A updated study was commissioned in 2007, recognizing that patterns of MSFW residence might have changed in the ensuing period.¹² The 2007 study provided guidance for targeted enumeration in 2010 with details on the different types of low-visibility MSFW housing found in different parts of the country because low-visibility and hidden housing vary from state to state, county to county, and even from community to community within each of the counties with high concentrations of MSFWs. This study has been used to target address canvassing efforts, but it is unclear to what extent the procedures have been used and formalized and it is unclear to what extent this study or others like it will be used in targeting special enumeration procedures in other areas with hard to locate housing units.

The Census Bureau can build on and expand its strategy of developing targeted approaches oriented toward minimizing differential undercount, starting with MAF improvement. It would be valuable for the Bureau to work community based partners to identify local neighborhoods and small areas with hidden housing units, i.e., areas in which particularly serious problems of MAF quality (based on neighborhood characteristics) are known and to strategically implement targeted update-enumerate and update-leave procedures in addition to or in lieu of mail-out/mail-back with a flawed MAF.¹³

¹² Contract Number 05-41823-0-0 "Identifying High Concentrations of Migrant and Seasonal Farmworkers" submitted by the Aguirre Division, JBS International to Population Division, Census Bureau.

¹³ Improvements and operations such as these can have a positive effect with respect to dislocations caused by the current foreclosure crisis, since many houses in the MAF will be vacant, former occupants will be in "unconventional" housing units and crowded, complex circumstances.

The Bureau's hard-to-count (HTC) database (based on Census 2000 data) already provides an operational tool for targeted enumeration efforts based on scoring expected difficulty of enumeration because of housing and population characteristics known to be correlated with undercount. My understanding is that the Bureau is updating this planning/operational tool with data from the 2006 ACS¹⁴; this planning tool can be enhanced and updated utilizing partnerships with local community based organizations and local government¹⁵. The method of scoring in the HTC database could be enhanced by including additional demographic and other characteristics, which would improve its utility as a tool to guide decisions to allocate resources for targeted update-enumerate and update-leave operations. Researchers advise us that it is possible that revising the "crowded housing" component of the HTC index from a yes/no variable into a continuous variable of computed household size might improve the model's utility for targeting small areas with unusual housing. Bureau-community partnerships could be used to incorporate local community knowledge about the nature of housing accommodations in different neighborhoods and tracts into decisions for targeted update-enumerate operations, as well as including guidance (as in the Aguirre/JBS report about the types of low-visibility housing units likely to have been omitted from the MAF, e.g. clusters of trailers or "back houses", commercial space illegally converted to residential use, etc). I am aware that, in general, the Bureau's utilization of leave-enumerate procedures is constrained by cost but costs incurred "up front" might be offset by decreased costs in verifying Be Counted addresses and would improve the undercount of the hardest to count populations.¹⁶

Evaluate Hard to Locate Housing Units and the MAF and Incorporate Best Practices into the ACS

It is essential to have the Census Bureau incorporate in planned 2010 coverage measurement and evaluations appropriate methods to measure and evaluate the MAF in areas with high concentrations of hard to locate housing or hidden housing units.

A targeted post enumeration survey which included ethnographic research (as was the case in the 1986 Los Angeles test census and the 1990 ethnographic program) would be very effective in this effort if specifications were to include additional attention to the nature of housing accommodations in the area and, specifically and systematically, to assess prevalence of low-visibility and/or crowded housing. It will be critical to incorporate the recommended best

¹⁴ Presentation by J. Gregory Robinson, Antonio Bruce, Erin Love, and Guinevere Mills, "The Planning Database", October 8, 2008.

¹⁵ Integration of local knowledge of community based groups also would improve LUCA results.

¹⁶ I note that other improvements that might address enumeration of hard to count populations include expansion of the period of time in which Be Counted forms will be available and Questionnaire Assistance Centers (QACs) will be in operation. It is presently of very brief duration and limited hours.

practices and evaluation results into the ACS because the 2010 MAF will be the MAF for the ACS and the ACS will be the long form data after 2010.

Summary Conclusions

The Census Bureau faces inevitable challenges in generating a reliable Master Address File as the frame for a decennial census conducted predominantly via mail-out/mail-back procedures for eliciting household information as our society continues to become more ethnically, linguistically, and socio-economically diverse.

A “one size fits all” approach to census enumeration cannot be expected to work in a context where there is increasing demographic, socioeconomic, and cultural diversity coupled with increasing levels of social distrust, stemming from tensions between rich and poor, immigrants and native-born Americans, and ethnic diversity.¹⁷ MAF improvement is an area where the Census Bureau can make significant further progress even with budget constraints. The key to success will be to build not only cordial but effective partnerships with community-based organizations, expanding partnerships from census promotion into partnerships where local and regional census offices rely more on local knowledge and insight to develop special procedures for addressing the characteristic enumeration challenges in a broad spectrum of local community contexts. An absolutely necessary condition which must be met to make such efforts effective (and cost-effective) is for the Census Bureau to become more flexible in its operational procedures, so that local problem solving can yield a maximum return in enhanced enumeration.

Efforts to improve the quality of the Master Address File are the first stage in broadening the overall scope of the Census Bureau’s interactions with its local partners. Flexible procedures for joint problem solving will not only help in MAF improvement but can be an important step in building local trust in the seriousness, integrity, and commitment of the Census Bureau.

The LUCA process, for example, signals a Census Bureau commitment to local partnership in MAF development, however, local officials do not all fully understand the reasons why housing units are not in the MAF and may not have a good ground-level picture of housing conditions in the most blighted neighborhoods of their communities. Community groups may have a sound, vivid, understanding of housing conditions in their neighborhoods, but not understand the “system” problems involved in translating that knowledge into data that the Census Bureau can use to improve the MAF.

Census Bureau-community partnerships will need to go beyond the useful, but basic, cooperation typical of local Complete Count Committees and the basic cheerleading function of encouraging census participation by unmotivated and distrustful persons within the hard-to-count populations.

¹⁷ See Robert Putnam’s paper, “E Pluribus Unum: Diversity and Community in the 21st Century The Johan Skytte 2006 Prize Lecture”, Nordic Political Science Association, 2007.

Collaboration in MAF development is a starting point to move further forward. The decennial census provides a unique opportunity to jumpstart the process of taking Bureau-local community partnerships to a higher level, and making them more effective and cost-effective. It will be important to begin right now to lay the groundwork so that working relationships established in 2010 and newly-tested “best practices” can contribute to an enhanced American Community Survey during the coming decade.

I thank the committee for the opportunity to present this testimony.
