

15 November 2022

Ms. Shannon Wink
Program Analyst
Policy Coordination Office
U.S. Census Bureau
4600 Silver Hill Road
Washington, D.C. 20233

RE: Docket Number USBC-2022-0004 Federal Register: Soliciting Input or Suggestions on 2030 Census Preliminary Research, U.S. Census Bureau

Dear Ms. Wink,

TESOL International Association supports the vital work of the U.S. Census Bureau. In response to the proposed information collection published by the Bureau in the Federal Register (87 FR 50599), we are pleased to provide the Bureau with comments and recommendations for Census 2030 early planning.

As a professional association dedicated to elevating multilingual learners of English (MLE) and educators, we serve individuals, communities, and educational institutions across the globe, with a focus on equitable access and inclusion of MLEs within the U.S., including local, state, and federal policy and appropriations. The U.S. Department of Education's Office of English Language Acquisition estimates that there are more than 5 million MLEs in the public education system,¹ and estimates from the Migration Policy Institute suggest that almost half of all immigrants are limited English proficient (LEP).² These communities rapidly shift, especially with the infusion of refugees and those who are present in the U.S. without lawful status. In short, our members work with marginalized and at-risk communities, who are often undercounted.

From this perspective, our comments and recommendations reflect ongoing collaboration and efforts to include MLEs and their families in the U.S. Census. We provide our responses in line with four of the five general areas requested by the Bureau:

Reaching and Motivating Everyone

TESOL members work with a range of MLEs and communities, from Pre-K–12 education, higher education, adult education, and refugees/immigrants. These communities are often intertwined and closely knit, especially around ethnic, political, linguistic, and social lines. When involved in providing access to and delivering English language instruction, our members go well beyond pedagogy and classroom instruction to include social and cultural navigation and inclusion, whether for the school system or the larger community. Through this support and engagement, we know the value of having individuals from within the community who trust and aid us.

¹ <https://nces.ed.gov/programs/coe/indicator/cgf/english-learners>

² <https://www.migrationpolicy.org/research/immigrant-us-born-parents-young-children>

TESOL recommends that the Bureau work with groups for what we have termed a trusted ambassador program. This approach relies upon relationships and requires significant outreach and engagement leading up to the 2030 Census. This program serves to reach and motivate groups or individuals within those groups who may have hesitation about or a distrust regarding answering questions from the government.

Technology

The use of technology within education has advanced dramatically as a global response to the realities of the pandemic but has also illuminated inequities in access and literacy, especially within MLE communities. To address the digital inequities, TESOL recommends that the Bureau:

- Leverage the Digital Equity Act (DEA) by working with the states as they build their plans and focus upon access and use of technology. Though much of the DEA will strengthen the infrastructure, additional attention is needed to reach communities and engage in dialogue about how they access and use technology. It is not a matter of “if we build it, they will come,” but, as before, building relationships and working with educators, nonprofits, and other agencies to bridge the access and inequity gaps of technology.
- Explore means of communication beyond standard email, websites, and social media platforms to include technology that protects users and their data. One example is the use of WhatsApp, which is a preferred means of communication within many refugee and migrant communities because the data is encrypted.
- Develop practice forms that community and civic organizations can use to promote the Census and educate groups and populations about it and how to answer the questions. These forms would need to encompass the home languages of all respondents, beyond English and the 12 that the Census currently has available.

How [the Bureau] Contact[s] Respondents

In addition to the trusted ambassador program highlighted under Reaching and Motivating Everyone, TESOL encourages the Bureau to work with civic and community organizations to develop materials that align with messaging and educational pieces for the people they serve. The Bureau already does extensive outreach, and TESOL reinforces its desire to collaborate with the Bureau in these efforts.

One area identified by our members as a roadblock to interacting with respondents centers on technology, namely, automatic outreach and contact after submission that appears threatening (in particular to groups, such as refugees, who are already in stressful situations, including fleeing persecution). We encourage the Bureau to examine its contact protocols, especially on automated messaging, so as not to overly burden respondents or appear threatening.

Respondent Support Services

TESOL International Association and its members are educators and professionals advancing the teaching of English to speakers of other languages, and we advocate for language instruction from an asset-minded approach. This approach values not only the native (or other) languages of MLEs, but also their communities, culture, and social contexts.

TESOL applauds the Bureau for expanding the number of languages in which the Census is offered, now at 12 plus English. More languages, though, should be offered, especially with the influx of immigrants and refugees into the country.

The Bureau's own data reports the top 17 languages spoken in the U.S.³ — a number that already exceeds the 12 languages in which the Census is offered. At a minimum, the 17 should be considered, for online and print materials as well as for call options.

The need to expand the number of languages in which the Census and the helpline are offered is underscored by the realities of the linguistic communities within the U.S., regardless of entry method into the country. The Department of Homeland Security tabulates both immigrant and nonimmigrant visas issued, and the Customs and Border Patrol, along with Citizenship and Immigration Services, works with arrivals. Close partnerships with DHS and its subagencies will help identify the expansion of languages.

This expansion, though, is underscored by the complexity of migration and the linguistic diversity people bring to the U.S. For example, Afghanistan, from which many refugees and asylees come, has Dari and Pashto as the official languages, not to mention the estimated 40 to 60 other dialects and languages spoken within the country.⁴ None of these languages is included on the list of 12.

TESOL encourages the expansion of languages and recommends that the expansion go beyond languages often associated with more affluent countries to include languages of immigrants, especially refugees and asylees, who are from developing countries.

Conclusion

TESOL International Association is immensely appreciative of the outreach of the Bureau and its efforts to be inclusive and reach all — whether a U.S. citizen or foreign-born. TESOL also applauds the Bureau's vision for a Census 2030 of all residents, regardless of immigration status, circumstance, background, or language. We look forward to working with the Bureau and supporting its efforts to reach this vision for 2030.

Thank you for your consideration of these recommendations, and please feel free to contact our Director of Advocacy and Public Policy, Jeff Hutcheson at jhutcheson@tesol.org should you have any questions or need any additional information.

Sincerely,
TESOL International Association

³ <https://www.census.gov/dataviz/visualizations/045/508.php>

⁴ <https://translatorswithoutborders.org/language-data-for-afghanistan>