



November 8, 2019

Ms. Kimberly Leonard
Committee Liaison Officer
US Census Bureau
4600 Silver Hill Road, Room 8H216A
Suitland, MD 20746

Re: National Advisory Committee on Racial, Ethnic and Other Populations 2019 Fall
Public Comment of the National Disability Rights Network

Dear Ms. Leonard,

I write today to provide public comment for the United States Census Bureau's National Advisory Committee on Racial, Ethnic and Other Populations (NAC) fall public meeting held between November 7-8, 2019.

The National Disability Rights Network (NDRN) is the non-profit membership organization for the federally mandated Protection and Advocacy (P&A) and Client Assistance Program (CAP) systems for individuals with disabilities. The P&As and CAPs were established by the US Congress to protect the rights of people with disabilities and their families through legal support, advocacy, referral, and education. P&As and CAPs are in all 50 states, the District of Columbia, Puerto Rico, and the US Territories (American Samoa, Guam, Northern Mariana Islands, and the US Virgin Islands), and there is a P&A and CAP affiliated with the American Indian Consortium which includes the Hopi, Navajo and San Juan Southern Paiute Nations in the Four Corners region of the US. Collectively, the P&A and CAP Network is the largest provider of legally based advocacy services to people with disabilities in the country.

The Census Bureau has reported up to 56.7 million people with disabilities live in the community, totaling approximately 19 percent of the non-institutionalized US population.¹ The Centers for Disease Control and Prevention believe that number is closer to 25 percent, one in four Americans.² The Census Bureau also considers "persons with mental or physical disabilities as a Hard-to-Count (HTC) population on the upcoming 2020 Census."³

NDRN appreciates the opportunity to give public comment at this year's NAC fall public meeting and asks that NAC recommend the following to the US Census Bureau:

1. As of October, 2019 it is our understanding that the 2020 Census online questionnaire has not yet been tested by people with disabilities to ensure that it is accessible for next year's roll out. The Census Bureau has said that "the online questionnaire is accessible, following the latest web accessibility guidelines."⁴ However, in order to ensure that the online questionnaire is fully accessible we recommend that the Census Bureau and its developers work directly with people who use adaptive technologies such as screen readers prior to Census Day 2020.
2. The Census Bureau has stated that the 2020 Census will be accessible, however, it is important to acknowledge that some individuals including some people with disabilities might still need/want help self-responding to the 2020 Census. Therefore, we recommend that the Census Bureau release official guidance related to if an individual can ask someone to help them complete the 2020 Census if needed by someone other than a census taker such as trusted friend, family member, personal care aide, or trained caregiver.
3. The Census Bureau has stated that they will utilize Telecommunication Device for the Deaf (TDD, also known as TTY) technology for their phone questionnaire next year. NDRN appreciates that the Census Bureau has tried to make their phone questionnaire as accessible as possible for individuals who are deaf or hard-of-hearing who might want to respond by phone and acknowledge that TDD technology is what will be used for next year's census. However, for future censuses and other Census Bureau surveys, we recommend that the Census Bureau consider using more modern technological devices such as videophones and video relay services as many people in the deaf and hard-of-hearing community do not use TTD/TTY anymore.⁵
4. NDRN appreciates and agrees with the Census Bureau's decision to list people with disabilities as HTC for Census 2020. However, the Census Bureau classifies the disability population in their HTC list as "persons with mental or physical disabilities". This type of classification of the disability community is not fully inclusive as it does not include people with developmental, intellectual and sensory disabilities, and instead we recommend that the Census Bureau change this language to "people with disabilities" moving forward.

On behalf of NDRN and the 57 P&A agencies it represents, I ask that the NAC discuss the needs of people with disabilities in the upcoming decennial census and consider the above four recommendations at this year's fall meeting. Thank you for considering our recommendations, and for giving us this opportunity to comment. If you have any questions or concerns please contact Erika Hudson, Public Policy Analyst, at Erika.Hudson@ndrn.org or 202-408-9514 ext. 134.

Sincerely,



Curt Decker
Executive Director

¹ <https://www2.census.gov/library/publications/2012/demo/p70-131.pdf>

² <https://www.cdc.gov/media/releases/2018/p0816-disability.html>

³ <https://www.census.gov/about/cac/nac.html>

⁴ <https://www.census.gov/content/dam/Census/library/factsheets/2019/dec/2020-accessible-everyone.pdf>

⁵ <https://www.dummies.com/languages/american-sign-language/using-videophones-can-see-now/>