

March 5, 2026

RE: February 3, 2026 [Federal Register Notice](#) on the 2026 Operational Test in Support of the 2030 Census

The undersigned organizations that advocate for or serve children and their families submit this comment to urge the Bureau to reinstate the original plans for the 2026 Operational Test so that it will conduct tests of new strategies for improving the count of young children.

We are deeply concerned that the changes to the 2026 Operational Test fail to include new strategies for improving the count of young children. This is a wasted opportunity to address a critical problem with the decennial census. We ask that the Bureau return to the original plan, rather than using the proposed approach which will not test any new strategies for counting young children, will produce misleading, unscientific, results, and will be a waste of time and resources desperately needed to improve the count of young children.

The count of young children, from birth through age 4, has grown steadily worse since 1980, even as the count of the general adult population has improved.¹ (There are of course other populations which are also not fully counted.) The 2020 Census produced a national count of young children that was about 1 million lower or 5.46% lower than it should have been.² Some states and some counties had counts that were much worse—for example, Florida and Hawaii had counts that were nearly 10% lower than they should have been, and Imperial County in CA, and Val Verde County in Texas, both had counts more than 20% lower than they should have been. (We commend the Bureau for developing a statistical measure of the young child count for states and counties.) Young children are missed for different reasons than adults are missed,³ so the Bureau needs strategies targeted at counting young children. It cannot assume that if it counts all adults in a household it will automatically also count the young children. In 2019, Count All Kids conducted public opinion research which showed that one in 10 families would not count their young

¹ *What Past Research Tells Us about How to Prepare for the 2030 US Census Count of Young Children*, Dr. William O'Hare, <https://countallkids.org/resources/what-past-research-tells-us-about-how-to-prepare-for-the-2030-u-s-census-count-of-young-children/>

² *Census Bureau Releases Experimental Estimates of State and County Undercounts and Overcounts of Young Children in the 2020 Census*, April, 2024. <https://www.census.gov/newsroom/press-releases/2024/undercounts-overcounts-children-2020-census.html>

³ *Data Show Young Children Are Missed In The Census For Different Reasons Than Adults Are Missed*, Dr. William P. O'Hare, April 2025. <https://countallkids.org/resources/data-show-young-children-are-missed-in-the-census-for-different-reasons-than-adults-are-missed/>

children and another 8% were not sure if they should. In other words, nearly one in five families is at risk of not counting their young child.⁴

Child advocates have urged the Bureau for several years to test new strategies for counting young children. Some of the undersigned organizations pressed for this in comments to the advisory committees,⁵ in responses to Federal Register requests for comments,⁶ and in a letter to Census Bureau Director Santos. In response, he advised us of some of the changes the Bureau was planning to test.⁷

The National Advisory Committee (NAC) recommended that the Bureau test new strategies for counting young children, and the Bureau accepted this recommendation.

The NAC recommendation and Bureau response:

The Census Bureau needs to test new methods, operations, and strategies to improve the undercount of young children. Such changes need to be well-tested before they are used in the 2030 Census. **RECOMMENDATION:** The NAC recommends that the U.S. Census Bureau report to the NAC and the public on what they plan to do differently in 2030 Census to improve the count of young children and what research and testing will take place to inform operations.

CENSUS BUREAU RESPONSE: The Census Bureau accepts this recommendation. As we prepare Baseline 1 of the 2030 Census Operational Plan for public release in 2025, we will keep the NAC and the public aware of the features of the design that are aimed at improving the count of historically undercounted populations, including young children. Currently, several 2030 Census research projects addressing our ability to effectively enumerate historically undercounted

⁴ *Webinar: Census 2020 Messaging Testing Results For Young Children*, September 2019, <https://countallkids.org/resources/webinar-census-2020-messaging-testing-results-for-young-children-2/>

⁵ These are only a few of the many times advocates made this recommendation to advisory committees. *Recommendation to the fall 2024 Census Scientific Advisory Committee*, <https://www2.census.gov/about/partners/cac/2030cac/meetings/2024-10/public-comment-coalition-on-human-needs.pdf> *Recommendation to the Fall 2024 National Advisory Committee*, <https://www2.census.gov/about/partners/cac/nac/meetings/2024-11/public-comments-chn-first-focus-for-americas-children.pdf> *Recommendations to the Census Bureau for Improving the Count of Young Children in the 2030 Census*, April, 2025, <https://countallkids.org/resources/recommendations-to-the-census-bureau-for-improving-the-count-of-young-children-in-2030/>

⁶ *Comments Submitted by Advocates in Support of Improving the Count of Children and the Quality of Child Data*, Jasmine Jones, December 2022, <https://countallkids.org/resources/comments-submitted-by-advocates-in-support-of-improving-the-count-of-children-and-quality-of-child-data/>

⁷ *Project Update: Advancing Strategies for An Accurate Count of Young Children in the 2030 Census*, August, 2024 (note this includes a link to the letter as well as a summary of his response indicating what they planned to test). <https://countallkids.org/resources/project-update-advancing-strategies-for-an-accurate-count-of-young-children-in-the-2030-census/>

populations are wrapping up the initial research phase. Among others, these projects include "Research on the Undercount of Young Children Using Administrative Data" and "Improving Within-Household Coverage Using Administrative Data."⁸

As recently as last summer, the Census released an operational plan for 2030 that specifically said they were “undertaking quantitative and qualitative approaches to better understand why young children, aged 0 through 4, are persistently undercounted in the decennial census. A potential remedy for this group is leveraging birth records and other administrative and supplemental data to augment collected response data.”⁹

The notice to which we are responding lists the various items that the Bureau will be testing, and none of the possible methods for improving the count of young children (or other undercounted populations) are included. We are deeply concerned that as a result the count of young children will be even worse in 2030.

We also want to flag some additional concerns.

- The test is using the American Community Survey (ACS) form and questions, rather than the decennial census test. This will produce unscientific results, comparing apples to oranges, which may be misleading and result in bad decisions for the 2030 census. *We urge the Bureau to use the decennial census form that will be used in the 2030 census.*
- Because the test is using the current ACS form, it is using the old race and ethnicity standards rather than the new ones that will be used in the 2030 census. This is a lost opportunity to test how families will interpret these questions, which is particularly problematic for young children because young children are the most diverse of any age group in our population.¹⁰ *We urge the Bureau to use a census form which uses the current race and ethnicity standards that will be used in the 2030 Census.*
- The supportive materials provide conflicting information on whether the results of this test will be published. Supporting Statement A says “We are not planning on publishing results.” Supporting Statement B says “The results from this test will be shared with stakeholders.” *We urge the Bureau to report its results so that census*

⁸ Letter from Director Santos to Cherokee Bradley with the Census Bureau Response to the Spring NAC Recommendations, September, 2024, <https://www2.census.gov/about/partners/cac/nac/meetings/2024-05/nac-spring-2024-recommendations.pdf>

⁹ 2030 Operational Plan, p. 15, <https://www2.census.gov/programs-surveys/decennial/2030/program-management/planning/operational-plan/2030-census-operational-plan.pdf>

¹⁰ *What New Census Bureau Population Projections Tell Us About the Future of Young Children in the US*, Dr. William O’Hare, March 2024. <https://countallkids.org/resources/what-new-census-bureau-population-projections-tell-us-about-the-future-of-young-children-in-the-u-s/>

stakeholders can learn from them and make appropriate plans for their outreach participation in 2030.

- We need a greater diversity of test sites in order to understand whether new strategies for counting children will work in a range of environments. A scattergram created by Dr. O'Hare shows that there is a low correlation between state-level net coverage rates and the undercount of young children.¹¹ The scattergram also highlights the reality that the factors leading to undercount of young children vary greatly from place to place. This, in turn, indicates that serious research efforts to develop sound strategies for improving that undercount need to be deployed in a diverse set of case study sites. The two proposed ones will not yield sound guidance for national efforts. *The Bureau should conduct its tests in all six sites originally planned.*
- The Bureau needs to focus on improved messaging to and non-response follow-up with complex households. Dr. O'Hare and Dr. Quiros' analysis of factors correlated with undercount of young children includes four variables related to family household composition that are individually and significantly correlated to undercount: % of children 0-4 in complex households, % of children in multi-generational households, % of children living with non-relatives or in group quarters, % of children who are not biological, adopted or stepchildren of householder.¹² This has some important implications for Census 2026 Test design. One is that the sample in each individual study community needs to be large enough to have an adequate sub-sample of complex households. Another is that it will be important to give special attention to non-family households. Finally, in general, given these different factors associated with undercount, the Census 2026 test design requires ethnographic research and cognitive interviewing to gain crucial insights about how to design messaging that overcomes what are clearly relational barriers to including some of the children in a shared housing unit in a census respondent's listing of the family roster. The research should also explore whether real-time identification of complex households is viable as an initial phase in NRFU and whether such information can be viably used to conduct proactive followup in households where there is a high probability of partial household omission stemming from young children in additional family/households at a housing unit with a single address. *We urge the Bureau to restore its original Census test design in order to test how to reach complex and non-family households so that it can improve the count of young children in these households.*

¹¹ See Figure 2 in *What Past Research Tells Us about How to Prepare for the 2030 US Census Count of Young Children*, Dr William O'Hare, <https://countallkids.org/resources/what-past-research-tells-us-about-how-to-prepare-for-the-2030-u-s-census-count-of-young-children/>

¹² *Socio-demographic Correlates of State-level Coverage Rates for Young Children in the 2020 Census*, Dr. William O'Hare and Dr. Susanna Quiros, October, 2025, <https://countallkids.org/resources/socio-demographic-correlates-of-state-level-coverage-rates-for-young-children-in-the-2020-census/>

- The Bureau needs to test strategies for adding low-visibility housing units to the Master Address File (MAF) and assuring their occupants are enumerated. Households omitted from the MAF are, in many community contexts, concealed sub-standard housing units that are hidden due to property owners in the primary (addressed) housing unit worrying they will be cited for building code or zoning violations. These low-visibility concealed housing units often have families with young children in them because the family units living in those units are typically marginally employed and sometimes ineligible for public assistance due to legal status. What needs to be tested in the 2026 tests is: a) effective community-based approaches for adding these low-visibility units to the MAF and b) messaging to encourage property owners to include their (often illegal) renters in the roster for the address. Testing should also include working with community groups to identify features of buildings that indicate they are being used as residences (such as swamp coolers on roofs or flashing on garages.) Testing should, ideally, also include attention to facilitating in-field “adds” as a component of NRFU. *The Bureau should return to its original plan which included efforts to locate and count households in such settings.*
- The Bureau should test and refine partnerships with child-serving organizations and institutions to enhance enumeration of very young children. The proposed Census 2026 Test is problematic because it only focuses on a subset of operational considerations and appear to be indifferent to the important role that social networks and local community-based organizations can play to most effectively help improve undercount young children. The test should include attention to collaborative planning prior to the point at which actual enumeration takes place. *The original plan included such collaboration with child serving organizations.*
- We also urge the Bureau to assess whether people who respond without the Census ID include young children, and other undercounted populations, who only responded via this method and would not otherwise have been enumerated. We note that Supporting statement B says that “As was done for the 2020 Census, the 2030 Census will allow people to respond with or without a Census ID”. The Census Bureau analysis of people responding in 2020 without a Census ID found that nearly 18 million people responded using this approach, or 12 % of the total population enumerated.¹³ But the report assessing this approach failed to state how many people were counted this way that would not otherwise have been included. We suggest that there are two measures that would be particularly helpful in assessing this. 1) Households that responded using an address not in the Master Address File, who therefore would never have received a census form with a Census ID, and 2)

¹³2020 Census Operational Assessment Report: Non-ID Processing, Daniel Donello, Venus Anderson, and Bradley Scott, November, 2023. <https://www.census.gov/programs-surveys/decennial-census/decade/2020/planning-management/evaluate/eae/2020-operational-assessment-non-id-processing.html>

Responses that added people to households that responded but were incomplete. While this would not capture the full population of people who would only have been captured using the non-ID response approach (for example, it might not capture people who needed support in filling out the form and therefore filled it out at an assistance site), it would give a partial assessment of its value.

For all the aforementioned reasons, we urge the Bureau to return to the original plan for the 2026 Census test. If that means conducting the test later, perhaps in 2027, that would be better than conducting this unscientific test that may produce misleading results and fails to test any new strategies for count young children. We also urge the Bureau to find other opportunities to test new strategies for counting young children, including the 2028 “dress rehearsal” test and smaller scale tests.

We very much appreciate the opportunity to share our concerns.

Sincerely,

Central Valley Immigrant Integration Collaborative

Coalition on Human Needs

Common Cause

Equality California

First Focus on Children

Minnesotans for the ACS and 2030 Census

National Network for Arab American Communities

The League of Women Voters of the United States

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