



# NATIONAL CONGRESS OF AMERICAN INDIANS

## National Congress of American Indians Comments and Recommendations on the 2010 Census and American Community Survey

### *Introduction*

The National Congress of American Indians (NCAI), the oldest and largest representative tribal organization, commends the Census Bureau for soliciting comments from federally-recognized tribes, state-recognized tribes, and tribal and national Indian organizations. The Census provides critical national, regional, and local data for the United States and Indian Country. American Indians and Alaska Natives have a significant stake in the accuracy and outcome of the 2010 census and the American Community Survey (ACS), as segments of the Indian population experience the highest rates of poverty, unemployment, and lack of infrastructure. Moreover, tribal leaders and decision-makers need accurate data for the American Indian/Alaska Native population, one of the most undercounted populations in the history of the decennial census.<sup>1</sup> At the 2006 NCAI Annual Session, member tribes passed resolution #SAC-06-008, “Reaffirmation of Support for the 2010 US Census.” NCAI supports the Census Bureau’s effort to conduct an accurate count of the American Indian and Alaska Native population in the decennial census and ACS. The support and participation of all tribal leaders and Native people is critical to the ultimate success of the 2010 census.

After a review of the history of the census in Indian Country, NCAI’s comments are organized by the following themes: (1) respect for the government-to-government relationship with tribes; (2) resistance and privacy issues, (3) promotion and outreach; (4) cultural issues and enumerator training; (5) improving access to and understanding of census data; and (6) census data availability for tribal people. Specific recommendations to address each of these issues are included.

### *History of the Census and Indian Country*

The history of the census of our nation’s first people informs the comments and recommendations that NCAI provides on the 2010 census and the ACS. Although the socio-economic situation in Indian Country is improving in many ways, various challenges to an accurate count have historical underpinnings and still affect the enumeration of American Indians/Alaska Natives and their general perception of the census.

American Indians were excluded from the first six US censuses from 1790 to 1850. Article I Section § 2 of the Constitution mandates that “Representatives and direct taxes shall be apportioned among the several states which may be included within this Union according to their respective numbers, which shall be determined by adding to the whole number of free persons, including those bound to service for a term of years, and **excluding Indians not taxed**, three-fifths of all other persons.” As a result, Indians not

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<sup>1</sup> U.S. Census Monitoring Board (2001). Presidential Members Report to Congress

paying taxes were not counted when determining the populations of states, as those Indians were assumed to have allegiance to their tribes and not the United States.<sup>2</sup>

As the federal Indian policies of allotment and forced assimilation were implemented, the Census Bureau began enumerating Indians who were considered assimilated in 1860. This distinction was primarily based on land ownership and these Indians were literally reported as “civilized Indians.” The historical controversies with enumeration and accuracy continued to plague the census. For instance, from 1850 to 1870, American Indians of mixed race who lived in white communities were counted as white and those who lived in Indian communities were counted as Indian.<sup>3</sup> This challenge in accurately representing the American Indian population persists to the present day, as exemplified in the debate over the multi-race option introduced in the 2000 census.

The 1890 census was the first to enumerate and report both taxed and non-taxed Indians. The barriers to enumeration in 1890 continue in Indian Country today. These include resistance to sharing information with the federal government, high population mobility, and lack of competent enumerators.<sup>4</sup> Many of the tribes in 1890 were opposed to the census process and held meetings to resist participating in the census count. Still, according to research for the Census Bureau, American Indians are among the least likely to answer the census.<sup>5</sup> A variety of issues contribute to that outcome. In 1890, only one agent was sent to the Navajo Nation to enumerate the entire reservation. Also, up to 1930, Bureau of Indian Affairs employees served as enumerators in Indian Country. There is evidence that some BIA officials systematically enumerated Indians for reasons other than counting, such as control over land allotments and exerting fiscal control. Up through the 1950 census, American Indians were identified based on the observation of the enumerator. In 1960, self-identification replaced observation as the method to identify American Indians, although in 1970 race again was obtained on the basis of observation in rural areas, including on reservations. The variation of census processes and practices to enumerate Indian Country render comparisons of successive census data very difficult.

Since 1980, identification as American Indian/Alaska Native in the census has consistently relied on “self-identification.” The 1980 census counted the highest number of Indians ever recorded. Although the count of American Indians in 1980 represented a 72 percent increase over 1970, a number of studies still documented very high undercounts for many reservations: 13 to 23 percent undercount on the Colville reservation (Ackerman, 1989) and up to a 24 percent undercount for the Pueblo of Santo Domingo (Census Bureau, 1984). According to the Census Post-Enumeration Survey, the 1990 census undercounted American Indians/Alaska Natives by an estimated 12.2 percent on reservations and 4.5 percent in all geographies. In the 2000 census, the reported American Indian/Alaska Native undercount substantially decreased to less than one percent. The Census Bureau attributes the improved accuracy to working with partners and local communities.<sup>6</sup> However, a number of concerns have been raised by tribal leaders and researchers working with the 2005 and 2006 ACS data for Indian Country. NCAI encourages the Census Bureau to work with the

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<sup>2</sup> Lujan, C. (1990). *As Simple as One, Two, Three: Census Underenumeration Among the American Indians and Alaska Natives*

<sup>3</sup> *Ibid.*

<sup>4</sup> *Ibid.*

<sup>5</sup> U.S. Census Bureau (2008). *2007 Federally-Recognized Tribal Consultations Background Materials*

<sup>6</sup> Testimony of Charles Kincannon, *Coverage Improvement Plans for the 2010 Census*, Before the Subcommittee on Information Policy, Census, and National Archives, U.S. House of Representatives, July 9, 2007

Race and Ethnic Committees, Census Advisory Committee, and Native researchers to fully investigate the extent of the reliability and accuracy problems with the ACS data for American Indians and Alaska Natives.

### ***Respect for the Government-to-Government Relationship***

Respect for the political status of tribes as governments and their members as citizens of sovereign entities has not always been a guiding principle of the census process. Until recently, the Census Bureau completely bypassed tribal governments and worked solely with the Bureau of Indian Affairs. The difference between the political status of enrolled tribal members and the Census Bureau's definition of who is American Indian/Alaska Native (i.e., self-identification) continues to present a thorny complexity for both census enumeration and tabulation.

NCAI commends the Census Bureau for improving its relationship with tribal governments since 1980. In 1980, the Census began holding regional meetings with tribal leaders, conducting workshops and distributing materials at Indian conferences, working with Native media, and hiring American Indians to work at the regional and headquarters level. Working with tribal governments is critical to reaching the hard-to-enumerate areas of the country, which are often located on reservation and trust land. Working with tribes is also consistent with the successful federal policy of Indian Self-Determination and Self-Governance.

#### **Recommendation:**

- NCAI recommends the Census Bureau continue working on a government-to-government basis with Indian tribes, fund the partnership and outreach programs at amounts comparable to the levels provided for Census 2000, and begin trainings for the tribal liaison program immediately.

### ***Resistance and Privacy Issues***

Given the history of broken agreements and the role that the federal government and changing federal policies have played in American Indian/Alaska Native life, resistance to census participation is not surprising. A 1990 report detailing a survey of Indian attitudes toward the census found that 23 percent of the Indian population in St. Louis would not cooperate.<sup>7</sup> Explanations for not participating included general distrust of the federal government and concerns about confidentiality.<sup>8</sup> Ethnographic research published in 2004 describes a model for whether respondents will report information based on an assessment of (1) the sponsor of the questions; (2) whether the questions are relevant to some legitimate purpose of the sponsor, and (3) possible consequences, positive and negative, of providing information.<sup>9</sup> When assessing the sponsor of the questions, respondents were most concerned about government agencies that control negative consequences, which for American Indians in the study included the Bureau of Indian Affairs. The report noted, "This concern [that government agencies are not benign] was particularly potent among groups which have historically mistrusted the Federal Government, such as American

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<sup>7</sup> Lujan, C. (1990). As Simple as One, Two, Three: Census Underenumeration Among the American Indians and Alaska Natives

<sup>8</sup> Ibid.

<sup>9</sup> Puente, M. (2004). Census 2000 Ethnographic Studies, Final Report

Indians.”<sup>10</sup> Many respondents believed that all government agencies share data freely. This belief persisted despite any assurances of confidentiality. As research shows, such assurances may be met with skepticism.

Ethnographic research among the Navajo and Inupiat revealed similar fear and mistrust of government and its pledges of confidentiality. Respondents revealed fear of losing benefits or leases and having data misused.<sup>11</sup> In focus group discussions on trust, American Indian participants said that some people did not report all the residents in a household because they were afraid that the tribe would find out that they were breaking tribal or HUD rules and take away their housing.<sup>12</sup> This finding implies that the already high rate of overcrowding in Indian houses understates the problem. This has significant implications for federal programs and funding.

#### Recommendations:

- The results of an American Indian focus group project in 2003 recommended hiring people locally who will have the cultural sensitivity to understand the nuances of barriers to census participation. Hiring local enumerators will counter critical attitudes that foster non-response, such as distrust of the government and feeling that the information is too sensitive to share.<sup>13</sup> Every region and tribe is unique, and working with the tribe and tribal liaison will be critical. Enumerators should be able to explain to tribal people the confidentiality of data collected by the Census Bureau and that information is not released at any level that will allow for the identification of individuals.
- Another recommendation that research suggests is particularly effective in alleviating the privacy concerns of American Indians is the involvement of community organizations.<sup>14</sup> Especially for difficult to enumerate populations, such as American Indians in urban areas, partnering with Indian organizations, engaging respected members of the community, and providing information at community events can increase census participation. Many American Indians are also very mobile, moving back and forth from reservations to urban areas, and working with tribes and Indian organizations they trust is an effective way to reach these populations.
- The Census Bureau should recruit, retain, and promote individuals who are knowledgeable about tribal cultures and social and economic conditions for positions throughout the Census Bureau, including contracts, partnerships, and at the headquarters. Familiarity with tribal organizations and Indian communities is critical to effectively engaging the partnerships described above.

#### ***Promotion and Outreach***

The scale and apparent success of the 2000 census communications campaign was very encouraging. NCAI recommends the Census Bureau work with tribal leaders to ensure that

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<sup>10</sup> Ibid.

<sup>11</sup> Ibid.

<sup>12</sup> On the Road to 2010: American Indian Focus Groups, Final Report, Denver, CO September 23 - 25, 2003 by NATEK, Inc.

<sup>13</sup> Ibid.

<sup>14</sup> Puente, M. (2004). Census 2000 Ethnographic Studies, Final Report

promotional materials for the 2010 census are culturally-sensitive and that appropriate messages are conveyed through the most effective communications methods.

Research shows that the idea of “having one’s voice heard,” bringing greater attention to the American Indian and Alaska Native population and their needs, is effective in reaching out to tribal communities.<sup>15</sup> Promotional materials should be crafted for each region so that the message and framing is culturally appropriate. For example, American Indian themes from the southwest will not resonate well in the northwest or in Alaska. Another effective motivation for census participation is to emphasize community-specific benefits, such as providing information to enable services for one’s community or tribe.

#### Recommendation:

- The Census Bureau should publicize the tribal-specific benefits of census participation, incorporate a theme of “having one’s voice heard,” work with tribal representatives in developing messages, and ensure regional and cultural nuances are considered in the messaging.

#### ***Cultural Differences***

Research suggests that culturally-specific factors may affect the comparability and quality of data for American Indians and Alaska Natives.<sup>16</sup> For instance, for Inupiat people in Alaska, the definition and application of the concept of household and relationships to the head of household poses problems for comparability.<sup>17</sup> Craver (2000) found that around 40 percent of the Inupiaq households in her study had informally or formally adopted their grandchildren. The respondents could check either “grandchild” or “adopted child” on the census. If “grandchild” is checked, the household is classified as a grandparent-maintained household, but if “adopted child” is checked, the household is classified as a two-generation household. The latter scenario leads to underreporting of multi-generational grandparent-maintained households for the Inupiat, which alters the quality of data available for policy evaluation and may lead to erroneous conclusions, for example notions of the impact of welfare reform on children and families.<sup>18</sup>

One suggestion Craver (2000) made for addressing such problems is to have special enumerator training for Indian reservations and Alaska Native areas to identify cultural factors that may affect how respondents interpret and answer census questions. Further ethnographic research was needed to identify cultural-specific factors that affect the quality and comparability of data with other ethnic groups.

#### Recommendations:

- If the Census Bureau has not undertaken research about regional and tribal cultural differences, NCAI encourages the Bureau to conduct such research in time for the development of enumerator training guidelines as part of the 2010 Census.

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<sup>15</sup> Ibid.

<sup>16</sup> Craver, A. (2000). Complex Inupiaq Eskimo Households and Relationships in Two Alaska Rural Communities. Complex Households and Relationships in the Decennial Census and in Ethnographic Studies Final Ethnographic Report.

<sup>17</sup> Ibid.

<sup>18</sup> See, for example, Craver, 2000.

- Provide special enumerator training for American Indian reservations and Alaska areas that identify how respondents interpret and answer questions. The training should show enumerators how to help Native populations “translate” their answers into the appropriate Census categories.

### ***Improving Access to and Understanding of Census Data***

Tribal leaders and attendees at NCAI conferences consistently have questions about Census data and what is available for tribal communities. This ongoing challenge is particularly pronounced given the move from the decennial short-form to the ACS. This transition is not widely known among tribal leaders, or even policy analysts and other Native advocates. Increased training and information exploring the benefits and shortcomings of the available data is important for Indian Country.

Those researchers aware of the ACS change have voiced concerns about its reliability. Training on the transition to using ACS data – as well as its benefits and shortcomings – will be important for tribal leaders and decision-makers in Indian Country. Tribal leaders and planners would also benefit from training on other data available from the Census Bureau.

#### **Recommendations:**

- Provide trainings on the limitations of ACS data for Indian areas and populations as well as how to use the multi-year estimates.
- Work with the tribal serving Census Information Centers and other Native organizations to demonstrate the available data for American Indians and Alaska Natives.

### ***Concerns with Census Data Availability***

As the American Indian/Alaska Native population is such a small percentage of the overall population, data sources often lack sufficient sample sizes for many census surveys and publications to include data or analysis for this population. For example, the Census *Income, Poverty, and Health Insurance Coverage in the United States: 2006* report using Current Population Survey data does not include American Indian/Alaska Native data in many of the tables and analysis. One of the few mentions included in the report notes that American Indians and Alaska Natives had a 3 year average (2004-2006) uninsured rate (31.4 percent) that was higher than the rate for all the other racial groups and statistically not different than the rate for Hispanics. Information on poverty and insurance coverage is pivotal to the health and well-being of tribal people in the United States, and NCAI encourages the Census to include data and analysis for American Indians/Alaska Natives in as many ways possible. Collecting data on the needs of a population that faces such pronounced socio-economic challenges is critical to effective policy-making at the federal, tribal, and state level.

Another instance of missing data for American Indians and Alaska Native occurs with the *Voting and Registration in the Election* reports. Data is reported and analyzed by race and Hispanic origin throughout the report, including “White,” “Black,” “Asian,” and “Hispanic” but not “American Indian/Alaska Native.” A note in the report states: “Data for the American Indian and Alaska

Native and the Native Hawaiian and Other Pacific Islander populations are not shown in this report because of their small sample size in the November 2006 CPS.” This situation is all too common.

Recommendation:

- NCAI urges the Census Bureau to investigate and implement ways, including oversampling, to provide more data for American Indians and Alaska Natives, a population who especially need such information for planning, decision-making, and advocacy.

***Conclusion***

NCAI commends the Census Bureau once again for reaching out to tribal leaders and organizations for comments on the 2010 Census and Census activities. We look forward to working with the Bureau and Indian tribes to ensure a successful 2010 Census.

Papers and Resources on the Census in Indian Country

On the Road to 2010: American Indian Focus Groups, Final Report, Denver, CO September 23 - 25, 2003 by NATEK, Inc.

NCAI Testimony on Census 2000 Implementation in Indian Country before the Senate Committee on Indian Affairs, May 4, 1999

Bonvilain, N. and Brownrigg, L. (1991). Social Context of the 1990 Decennial Census at the Akwesasne Mohawk Reservation <http://www.census.gov/srd/papers/pdf/ex91-15.pdf>

Bonvillain, N. and Brownrigg, L. (1989). Residence Patterns at the St. Regis Reservation <http://www.census.gov/srd/papers/pdf/ex89-05.pdf>

Bonvillain, N. and Brownrigg, L. (1989). The Census Process at St. Regis Reservation <http://www.census.gov/srd/papers/pdf/ex89-03.pdf>

Craver, A. (2000). Complex Inupiaq Eskimo Households and Relationships in Two Alaska Rural Communities. Complex Households and Relationships in the Decennial Census and in Ethnographic Studies Final Ethnographic Report.

Fleisher, M. and Brownrigg, L. (1990). An Ethnographic Evaluation of Street-to-System cycling of black, Hispanic, and American Indian Males <http://www.census.gov/srd/papers/pdf/ex90-09.pdf>

Jojola, T. and Brownrigg, L. (1992). Ethnographic Research Project: Isleta Pueblo, New Mexico <http://www.census.gov/srd/papers/pdf/ev92-23.pdf>

Lerch, P. and Brownrigg, L. (1992). Coverage Differences in the Census of a Rural Minority Population in North Carolina: the Little Branch Area of the Waccamaw Sioux Tribe <http://www.census.gov/srd/papers/pdf/ev92-23.pdf>

Lobo, S. and Brownrigg, L. (1990). Oakland's American Indian Community: History, Social Organization, and Factors That Contribute to Census Undercount <http://www.census.gov/srd/papers/pdf/ex90-12.pdf>

Lobo, S. (1992). American Indians in the San Francisco Bay Area and the 1990 Census <http://www.census.gov/srd/papers/pdf/ex92-18.pdf>

Lobo, S. (2001). American Indian Urban Mobility in the San Francisco Bay Area. Final Report to the U.S. Census Bureau for the Comparative Ethnographic Research on Mobile Populations Project.

Lujan, C. (1990). As Simple as One, Two, Three: Census Underenumeration Among the American Indians and Alaska Natives <http://www.census.gov/srd/papers/pdf/ev90-19.pdf>

Moore, John H., Brownrigg, Leslie A. (1992). Determine Extent of Census Undercounting Among Certain Rural Creek Indians of Oklahoma: Coverage Evaluation Report for the US Census Bureau <http://www.census.gov/srd/papers/pdf/ev92-10.pdf>

Tongue, N. (2000). Navajo Complex Households: Final Report to the U.S. Census Bureau. Complex Households and Relationships in the Decennial Census and in Ethnographic Studies Final Ethnographic Report. Available from the Center for Survey Methods Research, Statistical Research Division, U.S. Census Bureau.

U.S. Census Monitoring Board (2001). Presidential Members Report to Congress. Can be retrieved from <http://govinfo.library.unt.edu/cmb/cmbp/downloads/April2001report.pdf>