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NATIONAL STATE DATA CENTER STEERING COMMITTEE

Representing a Network of 1,800 State Data Centers and Affiliates Nationwide

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We Bring Value-Added Census Data and Education to the User

February 12, 2019

Dr. Allison Plyer, CSAC Chair
Census Scientific Advisory Committee
U.S. Census Bureau, Room 8H177
4600 Silver Hill Road
Washington, DC 20233

Submitted via email: census.scientific.advisory.committee@census.gov

RE: February 2019 CSAC Meeting Public Comment

Dear Dr. Plyer—

I am writing on behalf of the National State Data Center (SDC) Steering Committee to share our comments on the design and plan for the 2020 Census. The SDC network includes state government statistical agencies, state universities, and data-providing organizations that partner with the Census Bureau to provide training, technical assistance, and extension of Census products in our states. The Steering Committee represents the interests of these organizations, and coordinates activities with the Bureau.

The 2020 Census serves a Constitutional purpose – which is counting all residents – and also serves as a data frame for the next decade of survey research throughout the nation. Our state agencies and state universities are major users of this data frame. We are concerned that aspects of the current 2020 Census design introduce risks to these purposes. In this letter, we offer comments on the issues of greatest concern; we have offered these same comments and recommendations to US OMB and the Commerce Department, in response to the Department's Federal Register Notice (83 *FR* 67213, published December 28, 2018).

Re: Content and Forms Design. Our network does not take a position on whether citizen population counts are data that the nation needs in 2020 Census tabulations; that is a policy question for Congress. Instead, we advise that methods and processes matter: If a new citizenship data element is needed, then the data collection processes should be thoughtfully planned, should maximize the accuracy, completeness, and validity of the 2020 Census, and should avoid introducing risks to validity.

We agree with the Census Bureau methodologists who have recommended a better, less risky option for providing citizenship counts. A citizenship self-response question will discourage millions of people from census participation, diminish accurate response, and require significantly greater expense in nonresponse followup. In contrast to a self-response question, a big-data-mining approach called "Alternative C" would: "Add the capability to link an accurate, edited citizenship variable from administrative records to the final 2020 Census microdata files"; and use this "enhanced microdata" to tabulate block-level counts. (January 3, 2018 memo from John M. Abowd, Chief Scientist at the Census Bureau) The big-data-mining approach renders a citizenship self-response question on the 2020 questionnaire unnecessary.

Re: Nonresponse Followup: definition of completeness. The proposed Nonresponse Followup (NRFU) workload includes "mail returns otherwise deemed to be too incomplete." We do not see that (in)completeness has been defined here. We recommend that when 2020 Census questionnaires are returned partially complete, or when interviews or internet response sessions are ended partially complete, only incomplete *priority data elements* merit NRFU referrals. Priority data elements are those that are essential: address of the housing unit, a listing of all persons, ages and sexes, and relationships within households.

We do not recommend citizenship status as a priority data element, for reasons discussed above. Soliciting voluntary, accurate response is crucial to preserve 2020 Census's validity. The 2020 Census questionnaire content, design, and communications should encourage participation, and avoid burdensome, detrimental features – such as requiring answers to sensitive questions, where answers could be obtained from administrative records.

Re: Internet Self-Response. Likewise, we recommend that the Internet Self-Response (ISR) system be programmed to accept partially-complete sessions, when respondents have provided all priority data elements, as discussed above. The user experience should not discourage respondents into abandoning their ISR sessions. We are concerned that system-generated prompts asserting compulsory requirements of sensitive information – disclosure of citizenship status, race or ethnicity – will incite some participants to abandon ISR sessions.

According to Census Bureau staff, the ISR programming used in the 2018 end-to-end test census did *not* allow for partially completed sessions. These were treated by Census Bureau as *no response*, which increases the workload and cost of NRFU. The "skip logic" of the ISR programming should allow respondents to easily submit partially-complete ISR sessions.

There will be census participants who will not disclose their citizenship status or other characteristics. We recommend that non-prioritized questions should not stand in the way of participants submitting, and Census receiving, the answers that participants will provide.

Re: Nonresponse Followup: vacancy determinations, address deletions. The *Federal Register* notice specifies that after *one* unsuccessful in-person contact attempt, nonresponding addresses will be screened with address statuses from US Postal Service (USPS). Those identified as "undeliverable-as-addressed" will be flagged for vacancy determination, or for address deletion (if the NRFU enumerator did not find the address). This is a risky approach that

will cause millions of false negatives and premature dismissals. From our experience, USPS's database is imperfect and ill-suited to be conclusive as "the primary administrative records source" (*Federal Register* notice, December 28, 2018, p. 67219).

An "undeliverable-as-addressed" flag should not be considered conclusive of address non-existence. Instead, "undeliverable-as-addressed" status does indicate that such addresses cannot and will not receive mailed Census materials. When associated housing units exist, cannot receive mail, and are dismissed after one unsuccessful contact attempt, these cases are at extreme risk of undercount.

We recommend that *before* address dismissals are finalized, those in question should be additionally screened. The *Federal Register* notice discusses screening with IRS databases and Centers for Medicare and Medicaid Services databases. We recommend also utilizing E-911 address databases available from most states (or from counties in states). E-911 address records are independently maintained and designed for universal coverage. This source can mitigate the risks of primary reliance on USPS.

Re: Redistricting Data. The notice states: "The Census Bureau intends to work with stakeholders [from the states]… If those stakeholders indicate a need for tabulations of citizenship data on the 2020 Census Public Law 94-171 Redistricting Data File, the Census Bureau will make a design change to include citizenship as part of that data." (*Federal Register* notice, December 28, 2018, p. 67221)

The SDC network includes state government statistical agencies that partner with the Census Bureau. We are unaware of any current use of citizenship counts as a factor in state and local redistricting in the 50 states. As the Census Bureau solicits input, we recommend the Bureau explicitly ask: What is the public purpose served by considering citizenship counts as a factor in redistricting decisions? Some of our SDC member agencies are participants in the Redistricting Data Program, and we look forward to hearing more about this process.

Thank you for your attention to our comments. Our steering committee can be reached by email: todd.graham@metc.state.mn.us, or by US mail: Todd Graham, Metropolitan Council, Research Office, 390 North Robert Street, St. Paul, MN 55101. Our network members are here to support the Census Bureau's work and the success of the 2020 Census.

Sincerely,

Todd Graham
Chair, Census SDC Steering Committee

cc: Census SDC Steering Committee Members
Tara Dunlop Jackson, Committee Liaison Officer, Census Bureau
Mario Marazzi Santiago, Puerto Rico State Data Center