



United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, DC 20240

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Re: Public Comment on Federal Register Notice, *Special Census Program*

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The Department of the Interior's Office of the Assistant Secretary for Indian Affairs, Office of Assistant Secretary for Insular and International Affairs, and the Office of Policy, Management, and Budget thank the Census Bureau for the opportunity to provide comment on Federal Register notice Documentation Number 2022-11218 on reinstatement of the Special Census Program. We strongly support the reinstatement of the Census Bureau's Special Census Program as referenced in the call for public comment. The Department of the Interior's support for this reinstatement is based on our reliance on accurate demographic, economic, and housing data from U.S. statistical agencies to inform decision making in Tribal and Island Areas (e.g., American Samoa, the Commonwealth of the Northern Mariana Islands, Guam, and the U.S. Virgin Islands).

The opportunity to request a Special Census enumeration for a specific geography, which may experience shifts in population and housing between Decennials, ensures that the public and decision makers alike have access to accurate and reliable information. This information can be used to determine the distribution of Federal funds and to inform education, transportation, and infrastructure planning. In this context, the Department of the Interior offers input in four areas presented in the Federal Register notice.

1. Evaluate whether the proposed information collection is necessary for the proper functions of the Department, including whether the information will have practical utility.

The Department of the Interior strongly supports the proposed information collection as necessary for the proper function of the Census Bureau – that is, being a leading provider of quality data about the nation's people and economy.¹ Examples of how the Special Census Program could have particular utility to Tribal and Island Areas populations of interest to the Department of the Interior could include the following:

- *Capturing changes in migration following natural disasters.* Accurate data on rapid and sudden changes is essential for the effective, efficient, and equitable distribution of Federal aid to people in affected areas, as well as for future planning in light of those changes. For example, capturing the potential changes in population and housing in the U.S. Virgin Islands following Hurricane Maria and Hurricane Irma in 2017 has a direct impact on the distribution of Federal funds that rely on population for allocation.
- *Addressing quality concerns in existing publicly available federal datasets.* Decision makers need reliable and accurate information to carry out their duties, and data gaps would be supplemented by a Special Census Program request. For example, the potential suppression of 2020 Decennial and Island Area Census results due to statistical quality concerns related to COVID-19's impact on enumeration could create a twenty-year data

¹ <https://www.census.gov/about.html>

gap in Tribal and Island Areas. Similarly, the underrepresentation of American Indians and Native Alaskans in the Census impacts government payments to Tribes and hinders development of social and economic policy making and resource allocation. The Special Census could help to increase participation of American Indians and Native Alaskans in the Census.

- *Capturing the impact of changes in economic circumstances.* Rapid changes in one sector of a small economy can have significant impacts on the population. For example, changes in Indian County economies and Island Area industry (e.g., tuna canning in American Samoa) have the potential to have significant impacts on population, housing, and economic patterns and needs.
- *To support specific policy and legislative needs.* For example,
 - Providing accurate Federal statistics is essential to accurate allocation of Federal funding. This may include short-term programs like the American Rescue Plan Act and its reliance on population data, the legislative call for Tribal economic information to be used to allocate the Infrastructure and Jobs Investment Act Orphaned Well Remediation funds to Tribal areas, or long-standing programs like the Pittman-Robertson Act wildlife grants to States, Tribes, and Territories that depend on population data for apportionment.
 - Addressing data gaps or lags in Federal platforms used to inform decision making. For example, there are known Tribal and Island Area data gaps in the White House Council on Environmental Quality's Climate and Economic Justice Screening Tool that a Special Census Program could help address.

2. Evaluate the accuracy of our estimate of the time and cost burden for this proposed collection, including the validity of the methodology and assumptions used.

The Department of the Interior would need additional information to provide specific changes on the proposed accuracy of the time and cost burden for this proposed collection. The Department of the Interior does have two general points regarding burden to Tribal governments and Island Areas. First, the Department suggests that the U.S. Census Bureau consider special outreach to Tribal governments and Island Areas, especially those with less capacity for electronic communications. The Bureau of Indian Affairs and the Office of Insular Affairs would be able to assist with this outreach. Second, the Department of the Interior urges the U.S. Census Bureau to consider how the cost of the Special Census impacts the ability of Tribal governments and Island Areas to access this critical program. Many of the Tribes and Island Areas that would most benefit from the Special Census are also the ones who are likely to be least able to afford the cost of the Special Census. Therefore, the Department of the Interior suggests that the U.S. Census Bureau considers waivers or cost sharing options for Tribal governments and Island Areas to mitigate the impact of the cost of the Special Census.

3. Evaluate ways to enhance the quality, utility, and clarity of the information to be collected.

To improve transparency and accuracy across statistical products, the Department of the Interior recommends that any Special Census results be incorporated into the methodologies of the following Census Bureau statistical products:

- American Community Survey
- Population Estimates Program

- International Database. This database is of particular importance to Island Areas because it is the only annual Federal population statistic available to Federal decision makers for these geographies. The Island Areas are excluded from the American Community Survey and Population Estimates Program.

By incorporating Special Census results into the above statistical products, it creates consistency and accuracy across data used by the public and Federal decision makers.

4. Minimize the reporting burden on those who are to respond, including the use of automated collection techniques or other forms of information technology.

The Department of the Interior supports efforts to reduce the reporting burden to improve the effectiveness and efficiency of data collection, while also ensuring the equitable outcomes of such efforts. This may be done using automated collection techniques such as the “Internet self-response instrument for respondents” and the incorporation of new methods identified for the 2030 Decennial Census as an initial collection method prior to fieldwork enumeration. However, the Department also recognizes that specific Tribal and Island Area populations may not have the same level of Internet access as the general U.S. public, which may impact survey response rates and data accuracy. As such, we encourage the Census Bureau to take into consideration (i) the population’s access to the Internet (e.g., known digital divide challenges) and (ii) the collection methods that have been most successful for the population in the past when considering collection techniques for the Special Census Program.

Thank you again for the opportunity to provide comments in support of the reinstatement of the Special Census Program, which will help ensure the Department of the Interior is able to make well informed decisions pertaining to Tribal and Island Areas.

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