



# THE BROOKINGS INSTITUTION

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July 16, 2007

Brian Harris-Kojetin  
Office of Information and Regulatory Affairs  
Office of Management and Budget, NEOB, Room 10201  
725 17th Street, NW  
Washington, DC 20503

via e-mail: [bharrisk@omb.eop.gov](mailto:bharrisk@omb.eop.gov)

RE: Request for comments regarding proposed Local Update of Census Addresses (LUCA) Program

Dear Mr. Harris-Kojetin,

On behalf of the Metropolitan Policy Program (MPP) of the Brookings Institution, I am pleased to respond to the notice in the June 15, 2007 Federal Register asking for comments regarding the Census Bureau's proposed Local Update of Census Addresses (LUCA) Program.

MPP promotes innovative solutions to help the nation's metropolitan communities grow in more inclusive, competitive, and sustainable ways. From this perspective, we believe that the LUCA Program is vitally important to metropolitan areas because, by providing a complete and updated address list and improved maps for use by 2010 Census field staff, it will lead to an improved count of housing and the population. These improved counts will benefit metropolitan areas by aiding in the distribution of federal funds, ensuring equitable congressional reapportionment, and presenting a more accurate picture of rapidly expanding or changing communities.

In general, we support the Census Bureau's plans for the conduct of the LUCA Program. We are particularly pleased to see the Census Bureau's efforts to make it easier for local areas to participate in LUCA, including improved training for localities, increased time localities have to review the Census Bureau address list, and the increased options for submitting updates to the LUCA Program. In addition, we see the change allowing local areas to update their boundaries as part of LUCA as being more cost efficient than having them respond separately to the 2008 Boundary and Annexation Survey.

We also support the Census Bureau's providing LUCA participants with a full copy of the Master Address File (MAF) after the 100-percent block canvass. Access to the post-canvass MAF will make local areas aware of how the block canvass affected addresses of concern to them; this in turn will provide local areas with an opportunity to monitor the removal of units that appear to be duplicates. It is important for local areas to be part of the process for deciding which units are maintained as part of the Master Address File.

We especially support allowing states to participate in the LUCA Program, a change that not only allows them to provide updates that localities may not have, but also to provide updates for localities that may lack the staff or budget needed to participate in LUCA adequately, if at all.

We do have several concerns, however. First, it is not clear which addresses can be appealed by local areas. We ask that this be made more explicit. Second, we are concerned that the Census Bureau has no plans to modify the LUCA Program for Gulf Coast areas that have experienced many changes in housing stock. In the absence of such plans, address canvassing by the Census Bureau staff will be critical because a poor address list in such a large area will noticeably affect the quality of coverage.

Third, while materials sent to local officials will indicate that the address list is confidential and must be returned, and local officials must sign a statement that they will do so, we suggest that the Census Bureau ensure through a post-LUCA “check off” review that the confidential materials in fact were returned.

Fourth, we reacted with concern to various issues raised by officials from the 2008 Dress Rehearsal states at a hearing on LUCA Program held by the House Information Policy, Census and National Archives Subcommittee on June 26<sup>th</sup>. The state officials identified several Dress Rehearsal LUCA problems including inaccurate TIGER maps, limited Census Bureau outreach (to encourage localities to participate), and issues training and technical support. They suggested that, based on their experience, LUCA Program staff be on the ground in localities earlier; work closely with governor’s offices and state data centers to promote the LUCA Program; and divide joint promotional and technical training workshops into a promotional workshop for elected officials and a training workshop for technical experts. Their suggestions seem logical to us.

Finally, we share the Government Accountability Office’s concern, expressed in its June 2007 report “Census Bureau Has Improved the Local Update of Census Addresses Program, but Challenges Remain,” that the computer-based training software and the MAF/TIGER Partnership Software were not tested in the 2008 Dress Rehearsal and were tested in only one locality in preparation for the LUCA Program. We encourage further software testing to assess potential usability issues. In addition, we agree with the GAO’s recommendation to establish a process to assess the LUCA Program’s impact by allowing participating cities that found no changes in their reviews to explicitly communicate that result to the Census Bureau.

In conclusion, MPP strongly supports the improvements to the LUCA Program for the 2010 Census and believes that additional changes that address our concerns will enhance the value of the program even further. I hope you find our comments of value, and thank you for the opportunity to provide them.

Sincerely,

A handwritten signature in dark ink, appearing to read "Andrew Reamer". The signature is fluid and cursive, with a long horizontal stroke at the end.

Andrew Reamer, Fellow  
Metropolitan Policy Program