



DEPARTMENT OF CITY PLANNING
CITY OF NEW YORK

POPULATION DIVISION

May 3, 2016

Ms. Jennifer Jessup
Departmental Clearance Officer
Department of Commerce
Room 6616
14th and Constitution Avenue NW,
Washington DC 20230

RE: Proposed Information Collection: Comment Request: Address Canvassing Test
Federal Register Vol. 81, No. 56/Wednesday, March 23, 2016, pp. 15505-15507

Dear Ms. Jessup,

On behalf of the New York City Department of City Planning (NYCDCP), I am pleased to respond to the notice in the March 23, 2016 Federal Register requesting comments on the Address Canvassing Test.

Given the mandate by appropriators to contain the costs of the decennial census, it is encouraging to see that the Census Bureau is looking to re-engineer its address canvassing operations as a source for savings. The cornerstone of this effort lies in the adoption of advanced technologies that make canvassing more efficient by allowing for "in-office" operations that replace on the ground field inspection of housing units. For much of the nation, not only is in-office canvassing more efficient and less costly, but the data and technologies now available may actually result in a more accurate address list.

NYCDCP has always believed that much of the labor-intensive field canvass operation is unnecessary for many parts of the nation, given the fact that much of the nation's housing stock is easily identified, clearly labeled with designators for mail delivery, and largely unchanging. And, even in those areas where changes have occurred, these are usually recorded by the Postal Service, which enables the Census Bureau to update their address files. By conducting in-office canvassing in these areas, the Census Bureau can save dollars and, just

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as important, focus their resources on those parts of the nation where field inspection is necessary to ensure accuracy of the address list. Typically, these are areas of the nation where small multi-family housing units are subdivided or where conversion from non-residential uses has occurred, as a result of pressure on the housing stock. These alterations and conversions are sometimes “under the radar,” because new and/or existing units are not clearly labeled for postal delivery, where mail may be left at a single drop point with no clear apartment designators. Last decade, the Census Bureau, in cooperation with local jurisdictions, developed a manual for labeling apartments in these situations.ⁱ Placing labels on these apartments, however, requires field canvassing.

The key to this whole endeavor is to ensure that the Census Bureau is properly designating areas of the nation that should receive in-office canvassing or canvassing in the field. A test needs to be conducted on how best to assure seamless integration of these separate operations. Moreover, materials and procedures used to train field canvassing workers should be evaluated. An empirical assessment of these plans and procedures is the only way of making sure that these tasks are feasible. Finally, the examination of addresses for Group Quarters (GQ) facilities is especially important in this test, given the Census Bureau’s plan to eliminate a separate GQ validation as part of the 2020 Census enumeration but, instead, perform GQ validation during the earlier address canvass.

The NYCDOP strongly endorses this empirical evaluation and encourages the Census Bureau to share the results with local jurisdictions throughout the nation, as a way of demonstrating confidence in the methods and technologies being adopted to ensure a cost-effective and accurate census in 2020.

Sincerely,

A handwritten signature in cursive script, reading "Joseph J. Salvo".

Joseph J. Salvo Ph.D.

ⁱ U.S Census Bureau (2009). Address canvassing listers: Job-aid for hard to locate housing units. Form D-462.1. Washington, DC: U.S. Census Bureau.