



October 5, 2020

Robin A. Pennington  
Decennial Census Management Division  
Program Management Office  
U.S. Census Bureau  
4600 Silver Hill Road  
Washington, DC 20233

Dear Dr. Pennington:

Our office is responding to the request for comment on Census Bureau Docket Identification Number USBC-2020-0005 on the topic of the 2020 Census Count Question Resolution Operation (2020 CQRO). The State Demography Office in the Colorado Department of Local Affairs has been collaborating with the Census Bureau as part of the FSCPE and SDC programs for decades. For the 2020 Census our office has participated in Boundary Annexation Survey, Local Update of Census Addresses, New Construction, Participant Statistical Area Program, Early Non-Response Follow Up delineation, the Count Review Operation, Boundary Validation Program and staffing the State Complete Count Committee. Colorado is very committed to supporting the Census Bureau achieve a complete and accurate count because our state agencies and local governments, plus hundreds of other non-profits are dependent on these accurate numbers for funding formulas, service delivery, and program planning for the next decade. Due to our interest and commitment we are providing the below recommendations and/or comments on the Count Question Resolution Operation (2020 CQRO).

1. We strongly encourage the Census Bureau to empower FSCPE (Federal-State Cooperative for Population Estimates) or SDC (State Data Center) representatives to make CQR submissions on behalf of tribal, state, and local governments. This will help ensure equity in program participation and a more complete review of 2020 Census count quality. Most of Colorado's local governments are very small and lack resources and expertise to review and evaluate the results of the 2020 Census for their jurisdictions. Implementation of a new DAS will make it even more challenging for these small local governments.







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2. We recommend removing the Notice's clause excluding population counts "relating to differential privacy" from consideration under CQR. There are so many problems and issues related to "differential privacy". Issues range from large errors in small geographies to the separation of housing from population creating issues with household size and occupancy. CQR is an optimal operation to address these often illogical or improbable issues.
3. Similarly, group quarter characteristics should also be available for challenge. In evaluation of test products from the Disclosure Avoidance System (DAS), improbable sex and age were assigned to group quarters. Since we remain uncertain that the DAS will categorize GQ's correctly and assign appropriate characteristics, we request that the 2020 CQRO program be expanded to allow officials to request a review of the counts and demographic characteristics of group quarter facilities. The CQRO is the logical place to handle such requests.
4. The CQRO should clearly state (including methods) how households and associated populations will be corrected for cases with geocoding and boundary errors within the context of the DAS.
5. We recommend that the Census Bureau also include count cases where housing units have been missed (not mistakenly identified as a duplicated unit or excluded for some other reason) as in scope for the CQRO review. If updated administrative records for the April 2020 period show that the housing existed and people resided in the housing, the housing and population counts should be amended.
6. We recommend that the CQRO be revised to state "population count" instead of "associated population" in reference to "Corrections made to the housing counts and associated population". This expansion would permit CQR participants to address implausible scenarios where household sizes and population counts are exceedingly discrepant with housing counts that may be entirely accurate. The CQRO is the logical place to handle such issues.
7. Since it is uncertain how the DAS will impact the data and infeasible for CQR participants to assess and substantiate "processing errors" impacting count quality issues addressable through CQR, we encourage the Census Bureau to establish a process whereby participants could be granted Special Sworn Status (SSS) to view confidential census records. This will improve transparency and provide a means to question counts if excessive noise or bias has been introduced into the data by the DAS. The CQRO is the logical place to handle such requests.





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There have been many challenges in this decennial due to Covid-19, fires, hurricanes, and politics. When combined with DAS and other 2020 Census operational changes, we know there are geographies in this country that will receive 2020 Census data that is unacceptably inaccurate or where the data is potentially correct but the communities have lost trust in the Census Bureau and will question the results. The CQRO program is the most logical place to remedy these situations. We understand that changes occurring through this program would not impact apportionment, but the ability to question the results and address correction are important because they will affect funding allocations, planning for the next decade, and confidence of the American public.

Thank you for the opportunity to provide comment on the CQRO and provide recommendations. If you have any questions please contact me: Elizabeth Garner, State Demographer at 303-864-7750 or [Elizabeth.garner@state.co.us](mailto:Elizabeth.garner@state.co.us).

Sincerely,

Elizabeth Garner, State Demographer  
Department of Local Affairs

