

To Dr. Robin A. Pennington  
Supervisory Mathematical Statistician  
U.S. Census Bureau  
Decennial Census Management Division  
4600 Silver Hill Road  
Washington, DC 20233

RE: Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; 2020 Census Count Question Resolution Operation. Federal Register Vol. 85, No. 150/Tuesday, August 4, 2020, pp. 47162-47165.

October 5, 2020

Dear Dr. Pennington,

In my capacity as the New York liaison to the Federal State Cooperative for Population Estimates, I respectfully submit this response to the August 4, 2020 Federal Register Notice (Notice), requesting comments on the upcoming 2020 Census Count Question Resolution (CQR) operation.

The purpose of the CQR is described in the FRN as:

The 2020 Census CQR is the only decennial operation by which corrections to the 2020 Census data can be made. Specifically, tribal chairpersons and the highest elected officials (or their representative) from state and local government units in the United States and Puerto Rico can submit a CQR case to request review of the official 2020 Census count of housing and associated population, and to correct boundary and count issues.

A comment on the notion of “count of housing and associated population”:

The disclosure avoidance system (DAS) that is currently being developed at the Census Bureau explicitly breaks the association between housing and population. No longer is there housing and associated population; there is a count of housing and a separate count of population. The CQR as described in the FRN only addresses a review requests with regards to the housing counts, not with regards to the population counts. Also note that the purpose of CQR in the operational plan<sup>1</sup> is worded slightly different: “to request review of the official 2020 Census counts of population and housing, and to correct boundary, geocoding, and certain coverage issues”. This more clearly indicates that requests to review the counts of population are part of the intended purpose of CQR.

On the housing counts review requests:

The unwritten assumption is that the DAS keeps the number of housing units and Group Quarters invariant. This is something that is not decided upon yet. The procedures described only work when the DAS does not add noise to these counts.

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<sup>1</sup> <https://www2.census.gov/programs-surveys/decennial/2020/program-management/planning-docs/CQR-detailed-operational-plan.pdf>

On those that can submit a CQR case:

The Census Bureau has been working for many decades with State stakeholders through the State Data Center (SDC) and the Federal State Cooperative on Population Estimates (FSCPE). I recommend that these state representatives can submit CQR cases without being assigned to do so by their state or local governments.

On leaving DAS out of scope:

The DAS adds error and the impact on the 'associated population' is unknown to the data user. But the DAS infused data products released so far have shown that the DAS error can lead to impossible and very improbable results in the official 2020 Census count of population. For example: household population less than occupied housing, married couples with not enough men or women to make up those couples, areas without adults, toddlers in federal prisons, etc. I see those as errors in the process and as such should be in scope for CQR.

On DAS masking errors:

Another problem the DAS introduces is masking other potential processing errors. It would be very helpful to get some data quality measures from the CEF, like imputation rates that would help identify CQR cases for review. Especially given that the period between the end of count and delivery of the first results is compressed which might lead to processing errors.<sup>2</sup>

On Group Quarters:

One of the potential processing errors being masked by the DAS has to do with Group Quarters. My understanding is that the DAS makes sure that all Group Quarters have at least 1 resident associated to it, since there cannot be any vacant Group Quarters. This has a potential danger that Group Quarters that had 0 persons in the CEF due to processing errors end up with non-zero population in the published data products and this obfuscates those processing errors. Count Review could have caught some of these instances, but since that operation was cancelled there needs to be a mechanism to indicate Group Quarters that had zero counts in the CEF. An option might be to give a select group, for example the FSCPE members that would have done the Count Review, access to the CEF (GQ counts only) in a secure environment.

On CQR resolution and Differential Privacy:

The Census Bureau needs to be clear on how it adjusts population counts as a result of CQR. For example: if a county notices some misallocated housing units and provides documentation for this, can the differential privacy algorithm applied to the CQR correction change the overall total population of the blocks involved (and thus the county)? Similarly, can adding missed housing units in CQR result in lower population counts because of differential privacy?

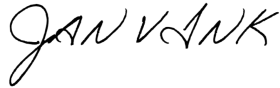
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<https://oversight.house.gov/sites/democrats.oversight.house.gov/files/documents/Census%20Slide%20Deck%20Aug%203%202020.pdf>

I look forward to working with the U.S. Census Bureau to help ensure the most accurate 2020 population count feasible for New York.

Best regards,

A handwritten signature in black ink that reads "JAN VINK". The signature is written in a cursive, flowing style with capital letters.

Jan Vink

New York Liaison and Steering Committee Member of the Federal State Cooperative for Population Estimates

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