



UMASS  
DONAHUE  
INSTITUTE

Dr. Robin A. Pennington  
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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 2, 2020

Dear Dr. Pennington,

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

I wish to note that the impacts of the Covid-19 pandemic - as well as delayed full funding earlier in the decade for Census 2020 preparations, the highly politicized proposed citizenship question and currently proposed linking of Census records to other administrative sources for the purpose of estimating citizen and non-citizen populations - have all put the 2020 Census count at a greater-than-usual risk of an undercount and misallocated count.

As you are aware, the U.S. Census Bureau did not have adequate time to fully execute all of its scheduled decennial count operations once the pandemic postponed the start of regular count operations. This meant that some Census preparation activities were eliminated or truncated, including *Early Non-Response Follow-Up* operations for off-campus college student areas (cancelled) and the post-enumeration *Group Quarters Count Review* (shortened and possibly eliminated as of this date), to name just two.

The pandemic-associated delays also meant that some planned Census count operations were modified in method or timing without the opportunity to test how these changes might impact the accuracy of the Census count. For example, while I am encouraged that the Census Bureau was able to collect directory information from many colleges on their off-campus student populations, it has yet to be determined how exactly these records will be used and whether these populations will be adequately counted using these administrative records. Likewise, it is undetermined whether a count of the homeless and transitory population in September will yield same or different results than an enumeration in April would have yielded, especially in

the case of seasonal shelters, seasonal service programs, and outdoor transitory locations. Finally, with a compressed timeline and Covid and citizenship concerns potentially leading to fewer self-responses, under-reporting of household members, and increased reliance on imputation, proxy interviews, and administrative records, it has yet to be determined to what extent these substitutions will be applied, and what their effects will be on population counts by household or community.

A partial list of Census 2020 count concerns for Massachusetts includes:

- Inadequate processing and validation of the millions of household addresses that Massachusetts submitted to the U.S. Census Bureau through operations including: Geographic Support Services Initiative (GSS-I), Local Update of Census Addresses (LUCA), Count Review Program (CRP), Group Quarters Count Review, and the supplemental group quarters, transitory location, and service-based enumeration address-frame submission due to resource and timeline constraints in the period leading up to the Census count
- Potentially incorrect count and allocation of the of the estimated 150,000 students living in *on-campus* dormitories in Massachusetts due to college campus closures before GQ enumeration activities started
- Potentially incorrect count and allocation of the of the approximate 350,000 *off-campus* college students living in Massachusetts due to Covid college closures, noting that the in-person college populations were only minimally restored by the time NRFU operations were conducted in August-September 2020 and that the comprehensiveness of student directory information supplied by colleges has not yet been evaluated
- Potentially incorrect count and allocation of international college student evacuated from campuses and off-campus private housing prior to April 1<sup>st</sup> who may not be captured in NRFU or even in self-response
- Potential misallocation by-state of usual resident or “snowbird” population counts in seasonal areas such as Cape Cod , including persons normally returning by April 1<sup>st</sup> or living in Massachusetts most of the time who may have experienced delayed return to the state due to Covid-related travel disruptions
- Low response among and the undercounting of non-citizens and other persons in mixed-status households due to the politicization and on-again/off-again status of the proposed citizenship question as well as the current proposed linking of Census records to other administrative sources for the purpose of estimating citizen and non-citizen populations
- Likely increased percent of non-responding households counted through proxy interviews or administrative sources due to timeline and Covid exposure concerns and *the extent of use and effect of these proxy substitutions on the total population count*
- Increased use of administrative records to determine vacancy status during compressed NRFU timeline potentially leading to increased false vacancies

- Implausible person-per-household rates at sub-state geographies resulting from the current proposed method and application of Disclosure Avoidance.

Given that the 2020 Census CQR is “the only decennial operation by which corrections to the 2020 Census data can be made,” and given that the unusual challenges of the 2020 Census have expanded the scope of threats to the accuracy of the Census count far and above what was experienced in the 2010 Census, it is only fitting that the 2020 Count Question Resolution also be expanded in its scope beyond the 2010 program parameters to address these concerns.

I respectfully request that the scope of the Count Question Resolution Program for Census 2020 be expanded in its definitions and eligibility as follows:

- The 2020 CQR as currently proposed states that “Count cases involve a review of the geographic location or placement of housing and associated population (geocoding issue), as well as a review of the enumeration universe for census processing errors (coverage issue)”. Given the numerous challenges to the Census 2020 outlined above, I request that **population** by Census block or by group quarters facility also be eligible for correction based on administrative records verification to be submitted by states, local governments, or their representatives including: college and university student directory and enrollment data, local annual street listing or voter registration data, school records, group quarters resident rosters or records, and other reasonable administrative sources.
- Given that vacancies determined by administrative records used in the 2020 enumeration have the potential of increasing false vacancies, I request that the CQR include **occupancy status** as eligible for review by state and local governments for both the housing unit and group quarters universe.
- Given that service-based enumeration populations may have changed between April 1<sup>st</sup> and September 2020, I request that the CQR include **SBE program population** as eligible for review and correction based on administrative records verification to be submitted by states, local governments, or their representatives including April-dated attendance or program utilization records for service based enumeration locations should counts differ from September participation dates.
- The 2020 CQR as currently proposed states that “Coverage corrections are limited to census processing errors, i.e., erroneous exclusions of housing identified as existing in census records as of April 1, 2020.” I request that **“existing in census records as of April 1, 2020” be defined** to include all addresses submitted through all state and local government and Federal State Cooperative for Population Estimates projects including GSS-I, LUCA, LUCA Appeals, New Construction, and *Count Review Program* projects,

whether these addresses were adequately processed for inclusion in the Census Master Address File or not. Compressed timelines meant that some addresses submitted by states may have not been adequately processed into the Census Master Address File. If a state or local government or FSCPE representative can demonstrate that an address was included in the submission file for any of these projects, it should be eligible for reinstatement and inclusion through the CQR program.

- Given that implausible person-per-household rates at sub-state geographies may result from the current proposed method and application of Disclosure Avoidance (DAS), I request that ***persons-per-household*** for sub-state geographies including minor civil *divisions* (MCDs) and blocks be subject to review and correction under CQR.

Thank you for both the opportunity to review the Census 2020 enumeration outcomes and the opportunity to make comment on the 2020 Count Question Resolution Program. On behalf of my project, I look forward to working with the U.S. Census Bureau to help ensure the most accurate 2020 population count feasible for Massachusetts.

Best regards,

Susan Strate

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

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