

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 5, 2020

Dear Dr. Pennington:

As the New Mexico liaison to the Federal State Cooperative for Population Estimates (FSCPE), I submit this response to the August 4, 2020 *Federal Register Notice* requesting comments on the upcoming 2020 Census Count Question Resolution (CQR) operation.

The 2020 Census has been conducted through unprecedented challenges including the Covid-19 pandemic and related operational timeline uncertainties, insufficient funding for mid-decade 2020 Census preparations, the highly politicized proposed citizenship question, the currently proposed linking of Census records to other administrative sources for the purpose of estimating citizen and non-citizen populations, and the ongoing development of a new Disclosure Avoidance System which the Census Bureau has yet to demonstrate can produce data that is fit for use. These challenges have put the 2020 Census count at a greater-than-usual risk of an undercount and misallocated count.

I therefore respectfully request that the scope of the Count Question Resolution Operation for the 2020 Census be expanded as follows:

- Representatives from the Federal State Cooperative for Population Estimates and the State Data Center network shall be allowed to submit CQR cases on behalf of their states.



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- Rather than limiting challenges to housing unit counts, *population counts* by census block or by group quarters facility shall be eligible for correction based on administrative records verification including: college and university student directory and enrollment data, local voter registration data, school records, group quarters resident rosters or records, driver's license data and other reasonable administrative sources.
- Given that it remains unknown the degree to which administrative records will be used to determine vacancies and household size, CQR shall include *occupancy status* as eligible for review and CQR participants shall have the ability to review *count imputation*, as used to determine household size.
- Given that the Disclosure Avoidance System (DAS) is producing implausible occupancy rates and household sizes, *persons-per-household* for sub-state geographies down to the census block level shall be eligible for review and correction under CQR.
- Since it remains uncertain that the DAS will categorize Group Quarters correctly and assign appropriate characteristics, the 2020 CQR program shall be expanded to allow review of *counts and demographic characteristics of group quarter facilities*.

Sincerely,

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