



STATE OF WASHINGTON

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October 2, 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:

We are responding to your 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 Washington State Office of Financial Management has been partnering with the Census Bureau as part of the FSCPE and/or SDC programs for the last five decennial censuses. For the 2020 Census our office has participated in BAS, LUCA, New Construction, PSAP, UGA delineation, Early NARFU delineation, the Count Review Operation, Boundary Validation Program and through numerous Complete Count Committee activities. We participate in the programs because we are committed to helping the Census Bureau provide the most complete and accurate data possible from the 2020 Census. We are very concerned that new operational changes, the Disclosure Avoidance System (DAS) and the unique situation of the decennial occurring in the middle of the Covid-19 pandemic will result in many challenges to the 2020 Census data. The CQRO program is especially important, as it is the only mechanism for tribal, state and local government to address inaccuracies in the census data and to correct official 2020 Census housing and population counts.

We recommend that State Federal State Cooperative for Population Estimates representatives also be added to the list of officials that can submit review requests. The FSCPE is has been partnering with the census bureau for over 50 years. Most FSCPE representatives are career demographic professionals and many have been participating in the decennial census preparation programs our office has. As technical experts recognized by their state and partners recognized by the census bureau, FSCPE members should be allowed to submit review requests.

With respect to under count cases with coverage issues, the federal register states that count cases “may result in the addition of specific housing and associated population identified during the census process, but erroneously included as duplicated or excluded from enumeration.” It is our understanding that the associated population for housing identified this way will be imputed. Our preference would be that the population be added through administrative records, rather than imputation, whenever administrative records are available. It is also our understanding that successful count cases with coverage issues will result in upward revisions to the population and housing and that no other state geography will be penalized population or housing. The federal register and CQRO program guidance should clearly outline what will occur for all scenarios.

We would like to request 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. We would prefer that the Census Bureau use the population obtained from administrative records rather than imputation to amend these counts.

The Disclosure Avoidance System (DAS) as it is currently being developed by 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. This is a significant departure from prior censuses. Because this association has been broken it is not clear how the census is going to move the appropriate number of people associated with the housing units corrected through CQRO reviews. For boundary and geocoding cases, it is unclear if the housing and population will be the same for the sending and receiving geographies. The methodology for handling all scenarios should be made clear with specific attention given to how the DAS will impact the ‘associated population’ in this notice and all CQRO program materials.

We request that the 2020 CQRO program be expanded to allow officials to request a review of their government’s total population count. We think this is necessary because there are many unknowns about the new Disclosure Avoidance System. Final decisions about the amount of noise infused in the census counts have not been made, so the amount of “acceptable” noise is unknown to local governments. The first two releases of demonstration data products have contained numerous illogical and improbable values.^{1,2,3} Some of the issues identified have been caused by processing errors that introduced bias into the data. The use of census data in program management and fund distribution are well documented⁴ and State, Local and Tribal governments should have 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.

The general characteristics of many GQ facilities are known. For example, female only or male only prisons, single sex college dorms, college dorms, nursing homes and juvenile facilities should have very specific age and sex profiles. The first two DAS demonstration products contained numerous illogical and improbable group quarter values.^{2,3} 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.

Inaccuracy of both counts and characteristics undermine public confidence in census data. We urge the Census Bureau to reconsider whether the FSCPE, tribal, state, and local governments can request a review of the population and/or characteristics if compelling arguments are made to do so. There have been many challenges in this decennial due to the Covid-19 pandemic, fires in the West and hurricanes in the Southeast. When combined with DAS and other 2020 Census operational changes, we can predict with relative certainty that there will be geographies in this country that receive 2020 Census data that is unacceptably inaccurate. 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 these corrections are important because they will affect funding allocations and planning for the next decade.

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If you have questions please contact Mike Mohrman, State Demographer, at 360-902-0602 / mike.mohrman@ofm.wa.gov.

Sincerely,

Marc Baldwin, Assistant Director
Forecasting and Research Division

¹ [Demonstration Data Products Workshop Presentations](#) – Hosted by the Committee on National Statistics (CNSTAT) of the National Academies of Sciences, Engineering, and Medicine, Dec 11, 2019.

² [OFM Feedback on Disclosure Avoidance System – Feb 6, 2020](#)

³ [OFM Feedback on Privacy-Protected Microdata File – Aug 20, 2020](#)

⁴ [Counting for Dollars 2020: The Role of the Decennial Census in the Geographic Distribution of Federal Funds](#), GW Institute of Public Policy. Andrew Reamer.

- Note that a new Privacy Protected Microdata File was released by the census on 9/17/2020. OFM has not yet reviewed it at the time of this comment. The September 17 PPMF release mimics the PL94-191 data release and does not contain the detailed age, sex information that the August 20 PPMF release did. Therefore, our comments and concerns about the quality of the demographic characteristics with the data persist.