

Dear Dr. Pennington,

We are grateful for the opportunity to respond to the proposed changes to the Count Question Resolution process for the 2020 Census. This census has been met with unprecedented challenges outside the control of the Census Bureau, including the pandemic, wildfires, and storms.

The Count Question Resolution process plays a unique and critical role in improving data quality because it 1) engages those who know the local data best -- state and local governments, and 2) is the only decennial operation by which corrections to the 2020 Census data can be made.

The timing and epidemiology of this pandemic was particularly troublesome for group quarters. As many as 40% of U.S. Coronavirus mortality has occurred in nursing homes, leading to longer and stricter lockdowns.(1) Additionally, according to a June Pew Research survey, 3% of Americans moved due to the pandemic, and 6% have someone new living in their household.(2) Many of the hardest to count populations are also, not surprisingly, the hardest hit both by the virus itself, but also the economic crisis.(3) For example, the Howard Center for Investigative Journalism reported hundreds of deaths among people experiencing homelessness in the early weeks of the pandemic, citing difficulty with compliance with social distancing protocols. Although Congress allocated more than \$4 billion in funding through the CARES Act to support this community, only a third of that funding had made its way to communities with high rates of homelessness by August. Gaps in services and a disproportionately high rate of COVID infection will be exacerbated in coming months by the expected 28-40 million people who will face eviction when federal protections expire. The additional complexity that the pandemic brings to an already complex first digital-first census (complete with the ability to respond without a MAF ID) plus truncated time for post-collection processing makes an *increase* in count processing errors over 2010 almost a certainty.

Given CQR's unique position in timing, and its process to allow jurisdictions to provide well-documented improvements, we recommend expanding the bounds of this program in a one-time special response to the pandemic -- a Covid Count Question Resolution. The CCQR would include:

1. In addition to the traditional engagement with jurisdictions around technical errors, expand the criteria to allow for jurisdictions to submit high-value administrative records to supplement records for hard-to-count populations. This might include administrative records on: University off-campus housing, homeless management information systems, SNAP, Indian Health Services, Group Quarters missed through the initial enumeration, or childcare assistance.
2. Move up the deadline for Covid-related CQR submissions to allow for inclusion before the release of the PL-94-171 redistricting data files, assuming the Bureau's Covid-19 Plan deadline of July 31, 2021.
3. A surge of Census Bureau staffing for CQR to provide technical assistance for communities so they can provide data in a complete and usable format, and then accept and process the administrative records from jurisdictions.
4. Ensure technical assistance curriculum is made available to state and local governments, including municipalities, to support their awareness, understanding, and ability to participate effectively throughout the CCQR process.

5. Issue a Request for Information (RFI) so communities can send in their observations on potential census data quality issues and suggest remedial measures.

Question:

The estimated level of effort is unchanged from 2010, despite the fact that the 2020 count has faced unprecedented challenges. Do you think that the pandemic will have an effect on the CQR process? If yes, how would you recommend CQR adapt?

Request:

We have been working with stakeholders around census data quality issues for the past year, and would be grateful for the opportunity to discuss the options around expanding this year's CQR processing into a special Covid Count Question Resolution process with the Census Bureau team.

Respectfully submitted,

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(1) "About 40% of U.S. Coronavirus Deaths Are Linked to Nursing Homes," New York Times, June 27, 2020, <https://www.nytimes.com/interactive/2020/us/coronavirus-nursing-homes.html>.

(2) D'Vera Cohn, "About a Fifth of U.S. Adults Moved Due to COVID-19 or Know Someone Who Did," Pew Research Center, July 27, 2020, <https://www.pewresearch.org/fact-tank/2020/07/06/about-a-fifth-of-u-s-adults-moved-due-to-covid-19-or-know-someone-who-did/>.

(3) Ross, D., Plyer, A., Coates, J., & Laackman, E, *Pandemic to Prosperity: Chronicling the Path from Response to Recovery*, National Conference on Citizenship, September 21, 2020, <https://ncoc.org/P2P>