



**DEPARTMENT OF CITY PLANNING  
CITY OF NEW YORK  
POPULATION DIVISION**

October 5, 2020

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.

Dear Dr. Pennington,

On behalf of the New York City Department of City Planning (DCP), I am pleased to respond to the August 4, 2020 *Federal Register Notice* (Notice), requesting comments on the upcoming 2020 Census Count Question Resolution (CQR) operation.

Given the Census's impact on good governance, and the use of control totals in other Census programs, DCP strongly believes that accurate 2020 Census data are of paramount importance. Further, recognizing that "CQR is the only decennial operation by which corrections to the 2020 Census data can be made," DCP would like to address concerns about CQR's capacity to account for all issues that may impact 2020 Census count quality.

The Notice states (as corrected in the August 14, 2020 Supplementary Notice) that "The CQR does not revise the population counts sent to the President by December 31, 2020, which determine the apportionment to the U.S. House of Representatives or revise the population counts relating to differential privacy, which is the new mathematical approach developed to protect the identity of individual respondents in the 2020 Census population counts." It further 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."

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In producing 2020 Census data, the Census Bureau will employ new methods of privacy protection, collectively known as the Disclosure Avoidance System (DAS). While census block housing unit counts and group quarters counts will be held invariant, total populations will be subject to the DAS. This represents a departure from the process used to produce 2010 Census data, when block-level total population was held invariant. This is potentially problematic, because the DAS goes beyond the basic noise infusion of differential privacy and uses corrective post-processing to produce a final microdata file. Post-processing will be used, in part, because differential privacy can produce certain impossible scenarios, such as negative counts. The Census Bureau and demographic experts agree that post-processing can produce far more error than differentially private noise (see CNSTAT's Workshop on 2020 Census Data Products: Data Needs and Privacy Considerations, Dec. 11-12, 2019; and the Census Bureau blog *Modernizing Disclosure Avoidance: What We've Learned, Where We Are Now*, John M. Abowd, March 13, 2020). Consequently, using the DAS opens the possibility of processing error impacting population counts in way prior censuses could not.

DCP emphatically supports the protections afforded to all Census participants under Title 13 of U.S. Code. However, given that 2020 Census block-level total population counts will be subject to the DAS, and that this in turn creates the possibility of processing error, the Census Bureau should remove the Notice's clause excluding population counts "relating to differential privacy" from consideration under CQR.

Further, because DAS opens up the possibility of processing error affecting population counts, and because DAS explicitly decouples population and housing unit counts, DCP firmly believes that all FRN phrasing referring to "housing" or "housing counts" and "associated population", should instead make reference to "housing" or "housing counts" and "population counts". Such a modification would permit CQR participants to address implausible scenarios where household sizes and population counts are exceedingly discrepant with housing counts that may be entirely accurate.

Another fundamental concern for DCP is the capacity of all potential CQR participants to conduct a thorough review of boundary and count cases, within the purview of the CQR program. To address this, we strongly encourage the Census Bureau to empower FSCPE (Federal-State Cooperative for Population Estimates) or SDC (State Data Center) representatives to make CQR submissions on behalf of tribal, state, and local governments. This will help ensure equity in program participation and a more complete review of 2020 Census count quality.

Returning to the subsection of the Notice which reads "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." Acknowledging that, to rein in costs, the 2020 Census will rely on the use of administrative records to a degree far exceeding past censuses. However,

Census Bureau testing has shown the use of administrative records can incorrectly overstate the count of housing unit vacancies (Keller, A., 2016, “Imputation research for the 2020 Census”, *Statistical Journal of the IAOS*, 32(2), 189–198).

Given the frequency of false vacancies, and the clear correlation between such false vacancies and an undercount, DCP strongly encourages the Census Bureau to allow CQR participants to review the use of administrative records as employed to determine occupancy status. DCP contends that false vacancies, produced via administrative records, constitute “erroneous exclusions” potentially at odds with local records, that would show occupancy status as occupied. Given an opportunity to review the use of administrative records used to determine occupancy status, CQR participants could potentially correct egregious errors using local data sources.

Similarly, the process of count imputation, opens up the possibility of “erroneous exclusions” in population coverage at odds with “census records”, that would show household size to be indeterminant. Consequently, DCP strongly encourages the Census Bureau to allow CQR participants to review count imputation, as used to determine household size. Given an opportunity to review count imputation, CQR participants could potentially correct egregious errors using alternative data sources.

Ultimately, without a detailed understanding of backend processing, it is infeasible for CQR participants to assess and substantiate “processing errors” impacting count quality issues addressable through CQR. Therefore, DCP strongly encourages the Census Bureau to establish a process, akin to the 2020 Census Count Review Program, whereby participants could be granted Special Sworn Status (SSS) to view confidential census records. These records should include the following sources at a census block level:

- Original DMAF housing unit universe (at time of mailout)
- Volume of Non-ID responses
- Counts obtained via NRFU operations
  - Proxy response counts
  - Household member response counts
- Vacancies determined during NRFU
- Deletions determined during NRFU
- Counts of Housing Units and Population dropped via de-duplication
- Count of vacancies, and housing units, where occupancy status was determined using administrative records
- Volume of count imputations
- Count of housing units deleted during In-Office Address Canvassing
- Count of housing units deleted during Field Address Canvassing
- Volume of Administrative Record enumeration

Given such an arrangement, the Census Bureaus can effectively “outsource” the identification of processing errors – relying upon the expertise of tribal, state, and local officials to save critical resources and further enhance count quality.

We recognize and clearly acknowledge how the COVID-19 pandemic, and scheduling issues, have presented unique challenges in obtaining an accurate decennial census count. However, such circumstances only serve to highlight the importance of the count quality that CQR helps ensure. Given this importance, you have my sincere thanks for your time and careful consideration of these critical issues.

Sincerely,

A handwritten signature in cursive script, reading "Joseph J. Salvo". The signature is written in dark ink and is positioned below the word "Sincerely,".

Joseph J. Salvo, Ph.D.  
Chief Demographer, Population Division