



*STATE OF RHODE ISLAND*

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Dr. Robin A. Pennington

Supervisory Mathematical Statistician  
U.S. Census Bureau  
Decennial Census Management Division  
4600 Silver Hill Road  
Washington, DC 20233

October 5, 2020

Dear Dr. Pennington,

In my capacity as the Rhode Island liaison to the Federal State Cooperative for Population Estimates (FSCPE) and the Rhode Island State Data Center (SDC) lead, I am 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 (CQR).

We have participated in the Local Update of Census Addresses (LUCA), Participant Statistical Areas Program (PSAP) programs along with several other municipalities in the state and I am writing today to voice my concerns about the 2020 Census CQR Operation.

The citizenship concerns, Covid-19 pandemic and compressed timeline are just a few of the many challenges or obstacles jeopardizing an accurate and complete count not just here in Rhode Island, but in all states.

Census 2020 count and accuracy concerns for Rhode Island includes:

- Likely increased percent of non-responding households counted through proxy interviews or administrative sources due to timeline and Covid exposure
- Increased use of administrative records to determine vacancy status during compressed NRFU timeline potentially leading to inaccurate vacancy reporting
- Potential miscount of college students living on-campus due to college closures before GQ enumeration started due to Covid
- Potential incorrect count and allocation of the off-campus college students due to Covid college closures
- 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*

- Potentially inaccurate household size rates at small geographies resulting from the current proposed method and application of the Disclosure Avoidance System and Differential Privacy

In light of the unique challenges mentioned above and many others associated with this Census, the restrictive scope of the planned CQR should be expanded to include:

- the submission of cases based on a wider variety of observable problems in addition to HU's missed or misallocated such as occupancy status as eligible for review by state and local governments for both the housing unit and group quarters universe.
- ability to submit challenges for more than just the highest elected official for a governmental unit and also expanded to include FSCPE and SDC members
- population count and characteristics available for challenge through this process given the unprecedented nature of the issues with this census mentioned previously
- 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 local colleges.
- 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
- "*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 programs such as *LUCA*, and *Count Review*.
- *persons-per-household* for sub-state geographies including minor civil *divisions* (MCDs) and blocks be subject to review and correction under CQR.

Again, given the unique challenges of the 2020 Census that will threaten the accuracy and completeness of the count unlike what was experienced in the 2010 Census, it is especially important that the 2020 CQR program be expanded in its scope to address these concerns and others.

Thank you for both the opportunity to review and provide comments on the 2020 Count Question Resolution Program.

Sincerely,

Vin Flood

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