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November 24, 2021

Ms. Sheleen Dumas  
U.S. Census Bureau, Commerce

RE: Public Comment Regarding 2020 Census Count Question Resolution Operation; OMB Control Number 0607-0879;  
Document Number 2021-23567

Dear Ms. Dumas,

Thank you for the opportunity to provide comments in response to the Census Bureau, Commerce Department's 2020 Census Count Question Resolution Operation Notice, under Federal Notice Document #2021-23567.

Much of the 2020 Census Count Question Resolution (CQR) Operation Notice appears to align closely with the CQR processes that have followed the previous decennial U.S. Census. However, with the noted changes made related to newly incorporated "disclosure avoidance measures and differential privacy," the Notice appears to exclude a CQR filing based on these changes. The Iowa League of Cities (League) encourages the Census Bureau to consider the subsequent questions raised:

- How can we best ensure an equitable count in those communities whose real counts were significantly impacted by the incorporation of disclosure avoidance measures and differential privacy?
  - o If new methods (alone) made an unreasonable change to the real count in a city, perhaps the CQR process should incorporate a "challenge" on these grounds. In these instances, the change must not also alter the population counts of other communities. Note that funding formulas are often based on population counts; therefore, these alterations may have significant impact on local jurisdictions.
- How would a Special Census be handled?
  - o If a city either believes its count was significantly impacted by the incorporation of disclosure avoidance measures and differential privacy, and if they would consider a Special Census, would it be possible that the base 2020 U.S. Census population be so far off as to impact a city's decision to conduct and fund a Special Census? It may make this decision particularly challenging for a community that does not know its real count due to noise injected in the original data.
  - o Would a Special Census also be subject to the same potential for results to be altered significantly by disclosure avoidance measures and differential privacy?

Thank you for your consideration of these important concerns.

Sincerely,

Alan Kemp  
Executive Director  
Iowa League of Cities