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November 29, 2021

U.S. Office of Management and Budget  
OIRA  
725 17th Street NW  
Washington, DC 20503

Submitted online.

RE: 2020 Census Count Question Resolution Program

Dear OIRA:

I am writing on behalf of the Metropolitan Council of the Twin Cities to submit comments on the 2020 Census County Question Resolution final guidelines (OMB Control Number: 0607-0879).

The Metropolitan Council is the regional planning agency and Metropolitan Planning Organization that serves the seven-county region surrounding Minneapolis and St. Paul. Among our responsibilities, we produce demographic forecasts and annual population estimates used for state government purposes (Minnesota Statutes 473.146 and 473.24).

We consider the Count Question Resolution (hereafter: CQR) Program an appropriate process for identifying and remedying 2020 Census errors. However, there are aspects of the Federal Register Notice, and the CQR Operational Plan that need to be clarified.

First, the FRN states: "CQR can correct only errors that occurred during the processing of information collected during the 2020 enumeration." We disagree with this limitation. We request that the scope be expanded to include: errors that occurred during the collection and/or processing of information collected during the 2020 enumeration and/or preparations for the 2020 enumeration.

Second, more specificity and guidance are needed in defining and describing varieties of possible errors.

If local, state or tribal governments detect an apparent undercount of housing in a local area, and if Census was provided or otherwise had in its address file some addresses that were never mailed, or never visited, or were "deleted" by Census staff for unclear reasons, does such situation constitute an error? The narrative in the Federal Register and the CQR Operational Plan do not define what is an error. This leaves determination entirely to Census Bureau's discretion. From our experience in bringing errors to Census Bureau's attention, we find the Bureau is predisposed to deny and ignore errors when it has overly broad discretion. (Details are available; my contact information is below.)

We are asking that the Information Collection and the CQR Operational Plan should explicitly state: The Census Bureau may determine that uncounted addresses or uncounted units will be counted if Census was provided or otherwise had the subject addresses in its address files at any time during 2018 to 2020. Such subject addresses would include address lists provided to Census Bureau during the Local Update of Census Addresses Operation, New Construction Operation, and Count Review Operation.

Finally, we are aware of a community in Minnesota that was designated for the "Update and Leave" operation of 2020 Census. Due to a "human error" (according to Census's temporary area office), Census workers were not assigned and did not visit as prescribed by the operational plan; therefore residents in the subject community did not see any Census worker or receive any mailing contact until September 2020. We do not know if this community was ultimately fully counted. However, we propose that "human error" during Census-taking field operations should have a remedy, if such errors are detected and substantiated.

Thank you for your attention to these comments. We can be reached by email: [todd.graham@metc.state.mn.us](mailto:todd.graham@metc.state.mn.us) or by U.S. mail: Todd Graham, Metropolitan Council, Research, 390 North Robert Street, St. Paul, MN 55101.