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May 27, 2017

Ms. Jennifer Jessup,
Departmental Paperwork Clearance Officer
Department of Commerce
Room 6616
14th and Constitution Avenue NW
Washington, DC 20230

RE: Proposed Information Collection; Comment Request; 2018 End-to-End Census Test – Peak Operations.
Federal Register Vol. 82, No. 59/ Wednesday, March 29, 2017, pp. 15486 -15492.

Dear Ms. Jessup,

The major purpose of the 2018 End-to-End test is to "test and validate 2020 Census operations, procedures, systems, and field infrastructure to ensure proper integration and conformance with requirements (FR/Vol. 18, No. 59, 15486)." I am concerned about the integration of operations to fully cover the range of living situations people find themselves in, specifically the population residing in non-traditional housing units and the group quarter's population. Having reviewed this Federal Register Notice, the 2020 Census Operational Plan Version 2.0, and the 2020 Census Detailed Operational Plan for the Address Canvassing Operation, and the initial results from the Address Canvassing Test, I do not have a clear understanding how these living situations will be fully covered and enumerated. It is unclear how much the End-to-End Test - Peak Operations will build on the Address Canvassing Test and assure a complete count. There are also issues with the Non-Response Follow Up (NRFU) procedures. It may be even harder to see how well Address Canvassing and Peak Operations have been integrated without the follow-on Post Enumeration Survey Test.

Non-traditional Housing Units

Regarding non-traditional housing units, the housing bubble did not occur uniformly across the country. We can only tell how well we have recovered if there is a high level of confidence that 2020 Census operational changes will have counted housing units and people in a way that makes the resulting data comparable to 2010.

The following table illustrates this situation for Nevada's two largest counties. Nevada does its own population estimates that include a housing unit-based estimate. Twenty states produce their own estimates and eight of them use some form of housing unit method as part of that. I have not yet been able to identify how unique Nevada's situation is but it could have occurred in a number of other areas as a result of the Great Recession.

Comparing 2016 Clark and Washoe County Assessor Counts to 2010 Census and LUCA Housing Counts			
Clark	Assessor	Census	Difference
2016 (Local Counts and LUCA)	841,438	914,257	72,819
2015 Local and Census Estimate	842,248	871,807	29,559
2010	811,450	840,343	28,893
Difference From 2016	29,988	73,914	

Comparing 2016 Clark and Washoe County Assessor Counts to 2010 Census and LUCA Housing Counts			
Washoe	Assessor	Census	Difference
2016 (Local Counts and LUCA)	189,054	198,620	9,566
2015 Local and Census Estimate	186,037	188,977	2,940
2010	178,238	184,841	6,603
Difference From 2016	10,816	13,779	

The Census reported substantially more housing units than was present in local assessor counts in 2010. As best as I can determine, these represent folks living in daily/weekly/monthly (DWM) hotel units. The current Master Address File (MAF) filter may be set to capture these units but it unclear how they will be treated going through the Interactive Review process and into In-Field Address Canvassing. Current plans call for a lister to visit "difficult multi-unit situations" as a subset of the total units in a given block (pg. 80, 2020 Census Detailed Operational Plan for the Address Canvassing Operation). Depending on business rules, the daily/weekly/monthly units may come under this approach. It is unclear what directions would be given for including these types of units in either Interactive Review and/or In-Field Address Canvassing. The risk to an accurate Census is excluding these units and a resulting undercount.

The connection with peak operations is that part of that effort is to look at how to refine Non-response Follow Up (NRFU) operations. Recent tests have focused on manager responses and/or proxy interviews. Daily/weekly/monthly units come into the Census as part of the total housing count and as an occupied unit if the occupants of the unit report it as their usual place of residence. They are not there in a temporarily homeless status but for some reason they are in a situation where, at the time of enumeration, they are residing in a DWM unit as their usual place of residence. Their inclusion has been dependent on traditional address listing and NRFU operations.

It is unclear from the 2016 LUCA housing counts if these units are increasing through the Delivery Sequence File (DSF) or if there are other housing situations that are being captured. If they are being captured through either the DSF or other means, there may need to be a field component to enumerate their residents. There are a number of risks for these units not being captured in either Address Canvassing or NRFU. In Nevada's case, we could see 2.6% of the population not counted and a lack of comparability with 2010 results for determining overall occupancy rates. This situation could get aggravated as the proposed cuts to Federal housing and income assistance come into play or if those programs are managed so as to discourage participation and there is an increase the population living in daily/weekly/monthly situations.

Group Quarters Population

I do not see an integrated approach to group quarters listing. The current Federal Register Notice includes "Testing updated procedures for handling newly discovered GQ's during field operations." It is unclear from the Addressing Canvassing Test as well as this notice how these new GQ units will be discovered given the potential range of group quarters' type and size of population by state. In 2010, the Group Quarter's population represented 2.6% of the total population. The institutional other group quarters' population ranges from 0.1% (New Hampshire) to 11.1% (Puerto Rico) of the total GQ population. The non-institutional other group quarters' population ranges from 7% (Mississippi) to 49% (Alaska).

Non-Response Follow Up

As was discussed at the Census Scientific Advisory Committee's March 2017 meeting the Bureau has made great strides in looking at how to utilize administrative records to reduce the NRFU work load as well as respondent burden. As was also discussed there, issues regarding the Black and Hispanic population for using administrative records with a potential undercounting of occupied units and population still remain. There are coverage issues by ethnicity, race, and geography in the IRS data. There have been some concerns raised with the IRS County-to-County Migration data and the number of exemptions that have recently been reported. This may be another issue as well as the coverage issue that impacts using administrative records in NRFU.

Conclusion

I know that the Census Bureau is doing the best job possible under a constrained budget environment. The current set of tests is partly a response to that environment. This is in comparison to the 2008 Dress Rehearsal that allowed for a fully integrated end-to-end test that simulated proposed 2010 operations including the Local Update of Census Addresses and Count Review programs. The analogy I use for the decennial census and population estimates is the retail sector. Taking an inventory of a store's goods is the decennial census and the

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administrative records (sales receipts and purchase orders) are the estimates. With an inventory there is the risk of missing the storage area, the shelf, or the drawer and not having a complete count to compare with the sales data and the previous inventory. With the movement away from a hard count of housing through In-house Address Canvassing and other 2020 changes, there is a risk that the storage area is missed and the population is not comparable to the 2010 Census.

Thank you for your time and consideration,



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