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

August 4, 2019

RE: Comments on 2020 Census Post-Enumeration Survey Person Interview and Person Follow-up, Docket number 2019-11705

Dear Ms. Jessup,

The Department of Commerce has asked for comments regarding the data collection associated with Post-Enumeration Survey that it plans to conduct in connection with the 2020 U.S. Census (Federal Register Vol. 84, No 108, June 5, 2019, Pages 26066 to 26068).

These comments are submitted by the Partnership for America's Children. The Partnership's 52 members in 41 states are multi-issue child advocacy organizations that work to improve policies affecting children in states and communities. The Partnership is serving as the national hub on the undercount of young children in the 2020 Decennial Census. Partnership members use Census data in their advocacy and thirty members are also KIDS COUNT grantees in their states, serving as the data hubs on children in those states for policy makers, administrators, and nonprofits. Many KIDS COUNT grantees and Partnership members are working to improve the count of young children in the Decennial Census.

The Dual Systems Estimates (DSE) compares results from a Post-Enumeration Survey (PES) to Census records to determine undercounts and overcounts. The DSE approach for 2010 was called Census Coverage Measurement (CCM). The 2010 Decennial Census is the first one where DSE produced data for the population age 0 to 4. In the 2000 U.S. Decennial Census, DSE estimates were made for age 0 to 9 and age 10 to 17, and in the 1990 Census DSE estimates for children were only available for the entire age group 0 to 17.

Our comments are focused on problems with the Post-Enumeration Survey (PES) in terms of measuring the census coverage of young children. In the 2010 Census, data from the PES regarding census coverage of young children (age 0 to 4) was inadequate. We have similar concerns to a lesser extent about ages 5 to 9.

Table 1 shows the results of DA and DSE for 2000 and 2010 Decennial Censuses in terms of comparable estimates of census coverage for different age groups. These two sources are relatively consistent for most age groups but are very inconsistent for young children (age 0 to 4). In 2010, the DSE estimated a 0.7 percent net undercount for age 0 to 4 compared to 4.6 percent for DA. In population terms, the DA estimates a net undercount of 970,000 people age 0 to 4, while the DSE estimated a net undercount of only 145,000 people in this age group. While DA estimates for young children have been updated since the 2010 results were released, there is still a huge gap between the DA results and the PES results for young children.

The Census Bureau Task Force on the Undercount of Young Children, (Griffin, 2014, page i) concluded, “The task force believes that Demographic Analysis (DA) provides the best measure of this undercount in the 2010 Census at 4.6 percent nationally.” This indicates that

the difference between the DA results and the DSE results is due largely to errors in the DSE results.

Table 1. Comparison of Estimated Percent Net Coverage from Demographic Analysis and Dual System Estimates for All Ages and Broad Age Groups: 2000 and 2010						
Age and sex	Estimate of percent net coverage				Difference	
	2000		2010		2000	2010
	DA	DSE ¹	DA	DSE ²	DA-DSE	DA-DSE
	-1	-2	-3	-4	(5=1-2)	(6=3-4)
All ages	0.1	-0.5	-0.1	0	0.6*	-0.1
0 to 9	2.6	-0.5	3.4	0.2	3.0*	3.2*
0 to 4	3.8	(X) ³	4.6	0.7	(X) ³	3.9*
5 to 9	1.4	(X) ³	2.2	-0.3	(X) ³	2.5*
10 to 17	-1.8	-1.3	-0.5	-1	-0.4	0.5*
Males: 18 to 29	0.3	1	-0.4	1.2	-0.7	-1.6*
Females: 18 to 29	-1.7	-1.3	-1.5	-0.3	-0.4	-1.2*
Males: 30 to 49	1.8	2	2.3	3.6	0.1	-1.3*
Females: 30 to 49	-0.7	-0.6	-1.7	-0.4	-0.1	-1.3*
Males: 50 and older	0.5	-0.8	-0.5	-0.3	1.3*	-0.1
Females: 50 and older	-1.2	-2.4	-2.4	-2.4	1.3*	0.1
¹ DSE for 2000 refers to the Accuracy and Coverage Evaluation Revision II estimates.						
² DSE for 2010 refers to the Census Coverage Measurement estimates.						
³ In 2000, there were no separate DSE data for those aged 0 to 4 and 5 to 9.						
* indicates a statistically significant difference between the DA and the DSA estimates at the .10 level.						
- indicates a net overcount.						
Source: O'Hare et al.2016, Table 1						

O'Hare and his Census Bureau colleagues (2016) suggest that uncorrected correlation bias may result in an underestimation of the undercount for young children in the DSE

methodology. In the absence of any other explanation for the large difference in net undercount estimates for young children between the DA method and the DSE method, uncorrected correlation bias in the DSE method is the leading explanation for the observed differences.

The U.S Census Bureau (2012 c page 1) describes correlation bias as follows:

“Correlation bias results from the failure of the general independence assumption underlying dual system estimation. This form of bias tends to lead to underestimation of dual system estimates if persons missed in the census are more likely than those found in the census to also have been missed in the Census Coverage Measurement survey.”

The issue of correlation bias in the DSE approach has been noted in the past (Wachter and Freedman 1999; Shores 2002; Shores and Sands 2003). The existence of correlation bias in the DSE method is already recognized for the adult Black male population. Currently, adjustments in the DSE estimates for adult Black males are made to correct for correlation bias (U.S. Census Bureau, 2012c). No similar adjustments are made for young children, in part because there is not a widely accepted method for doing so.

This is not a new problem. The mismatch between results of Demographic Analysis and Dual-Systems Estimates has been noted by other researchers (U.S. Census Bureau 2003, page v). A National Research Council report (2004, page 254) acknowledges the discrepancy for young children and notes, “No explanation for this discrepancy has been advanced.”

The PES is important because it is the only Census operation that provides components of Census accuracy. For example, DSE is the only method that provides omissions rates.

When these data are not available for a group, such as young children, it hampers our understanding of who was miscounted in the Census and why, making it difficult to improve operations for other surveys and the next Decennial Census.

The lack of reliable data on the undercount of young children from the PES is also problematic because the PES is the only method which provides data for race groups other than the black and nonblack groups reported in the DA analysis. In addition, the PES is the only method that provides net undercount rates by tenure (that is, whether the household rents or owns the residence).

When there are not useable data from the PES, information about the net undercount estimates for young children is greatly reduced limiting our ability to understand why young children have such high net undercount rates in the Census. The dearth of detailed demographic data on which young children are missed, hampers our ability to fix the problem.

The absence of usable data for the population age 0 to 4 from the DSE means researchers do not have a second measure of net undercounts to compare to the DA estimates for young children, the way they do for most other demographic groups.

The lack of data on young children from the PES operation in the 2020 Census will also make it more difficult to develop targeted communications campaigns to improve the count of young children in the 2030 Census.

We ask the Census Bureau to devote more attention to this issue. The Bureau can call on other experts such as the Census Bureau's Scientific Advisory Committee and the Census

Panel at the National Academy of Sciences for help in solving this problem. Perhaps the Census Bureau staff developing the DSE operation in 2020 could follow the model of the Census staff developing DA operations in the 2020 Census and convene an ongoing panel of subject matter experts from outside the Census Bureau to address this problem would help. New perspectives may help figure out ways to solve the problem.

We urge the Census Bureau to find a remedy for this problem as rapidly as possible in order to be able to improve the PES for the 2020 Decennial Census. If there is anything the Partnership for America's Children can do to help the Census Bureau solve this problem, please let us know.

If you have questions about this comment, please contact Deborah Stein at dstein@foramericaschildren.org, or at 202-290-1816.

Sincerely,

Deborah Stein, Network Director

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