

August 5, 2019

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; 2020 Census Post Enumeration Survey Person Interview and Person Followup

Submitted via [Regulations.gov](https://www.regulations.gov)
Docket number USBC–2019–0003

Dear Ms. Jessup,

The Georgetown Center on Poverty and Inequality (GCPI) and the Beeck Center write in response to the June 5, 2019 Notice in the [Federal Register](https://www.federalregister.gov) requesting comments on the 2020 Census proposed information collection. We are committed to better, equitable outcomes for individuals and society. As researchers and advocates for economic security and opportunity, we have a stake in understanding to what degree the 2020 Census is fair and accurate, and what populations may have been left out. The Post Enumeration Survey (PES) is a core component of such coverage measurement estimation, and the methodology for enumerating housing units and households in the PES sample will in large part determine how well the 2020 Census coverage measurement survey identifies people who were not counted, who were counted more than once, or who were included erroneously or in the wrong place in the 2020 Census, thereby supporting a statistically valid dual system estimation procedure. Though the coverage measurement operations are vital to evaluating the quality of the decennial count, the operations are expected to have a minimal impact on the overall cost of the census.

Comments:

1. A larger Person Interview sample size could help offset possible reductions in cooperation and completed interviews due to the political and social environment in which this operation will take place.

A robust sample size is essential for determining how demographically and geographically granular and statistically reliable the estimates of coverage will be, as is a sufficient level of cooperation. The proposed sample size of approximately 190,000 housing units for the Person Interview component of the PES is comparable to the 2010 Census coverage measurement survey sample size.

However, there is a growing culture of fear and distrust of the government, particularly among immigrants and people of color, as a result of anti-immigrant policies and rhetoric in the public sphere. This may have an impact on both direct household and proxy cooperation with PES

field staff. The upcoming presidential campaigns and election season may cause an increase in overly partisan rhetoric, which could, regrettably, increase fear and distrust of government in many households, thereby making it more difficult for interviewers to secure cooperation from residents. While this same phenomenon could affect census participation as well, the PES interview process presents unique challenges and has greater methodological implications because (1) the operation is not well-known and, therefore, could raise more suspicion among households in the sample; (2) the operation universally requires one or more in-person visits (as opposed to offering, for example, a more “anonymous” online response option as the census itself will offer); and (3) failure to “capture” a housing unit or household members in *both* the census and PES sample results in correlation bias which the dual system estimation methodology cannot easily overcome for all population subgroups at greatest risk of being missed.

In addition, community organizations will be focused, in large part, on efforts to increase voter turnout during the period when the Person Interview operation takes place, possibly diverting attention and resources away from activities to help ensure cooperation with census interviewers. Furthermore, the recent high-profile events surrounding the administration’s push to include a citizenship question on the 2020 Census could depress both response to the census and cooperation with PES interviewers.

These developments increase our concerns about whether the PES sample size is sufficiently large to produce estimates of acceptable reliability and detail. As recommended in the UN operational guide for Post Enumeration Surveys,¹ a decision on the appropriate sample size should take into consideration, among other factors, the expected level of non-response (that is, cooperation) rates.

The decline in response rates for Census Bureau surveys, including a projected lower response rate for the 2020 Census, raises further concerns regarding the sample size.² As a result, a larger sample size may be necessary.

2. Net coverage estimates and components of coverage for hard-to-count populations must be reliable.

An insufficient sample may not support production of reliable coverage estimates and components of coverage for the range of demographic and housing (tenure) characteristics, by useful units of geography, that the Census Bureau, policymakers, state and local governments, researchers, and other stakeholders need to evaluate census accuracy comprehensively and in

¹ United Nations Capacity Development, “Post Enumeration Surveys Operational Guidelines 2010, updated April 2010. Available at:

https://unstats.un.org/unsd/demographic/standmeth/handbooks/Manual_PESen.pdf

² U.S. Census Bureau, “2020 Census Operational Plan”, updated December 31, 2018. Available at <https://www.census.gov/programs-surveys/decennial-census/2020-census/planning-management/planning-docs/operational-plan.html>.

ways that shed light on disproportionate outcomes and inform additional evaluations of various census operations, as well as planning for future censuses. The decennial census historically has missed larger proportions of certain population groups, including Hispanics and non-Whites, renters, young children, and men, as well as residents of certain regions and areas counted by different enumeration methodologies, such as Update/Enumerate, while overcounting or counting more accurately other groups, such as non-Hispanic Whites, older people, women, and homeowners. All of these groups, in turn, are themselves diverse and require a more granular understanding of how well and in what ways the census counts them. For example, Black men ages 18 to 49 historically have been missed (omissions) at some of the highest rates of any demographic cohort. It is vital to understand the possible housing, household, and geographic factors that contribute to the high level of inaccuracy for this population group. Whether omissions occurred in households that otherwise were counted (within household misses) or as a result of housing units that were missed entirely in the census (whole household misses), for example, is important to know.

3. Demographic information collected in the Person Interviews and reported as a characteristic for coverage measurement purposes should include sex/gender. Person Interviews also should determine housing tenure -- that is, whether the housing unit is owned or rented by the householder or another responsible member of the household.

The description of the Person Interview does not include sex/gender as part of the demographic information to be collected about each person in sample households (see #5). All previous post enumeration surveys conducted in conjunction with a U.S. decennial census have collected information on gender and reported net coverage estimates for males and females, cross tabulated by other characteristics. This variable is extremely important, since previous coverage evaluations have shown significant differences in the accuracy of the census for males and females.

Similarly, the Census Bureau has previously reported coverage estimates for owners and renters, cross-tabulated by demographic characteristics. This information is important, as these two factors are often viewed as loose proxies for higher and lower income households. Previous coverage evaluations have shown that renters are missed at higher rates in the census than homeowners, suggesting that future censuses should include activities specifically designed to improve participation among households that rent their living quarters.

4. Timing of Person Interview and Reinterview operations.

We support the proposed earlier time frame for conducting this important component of the 2020 Census coverage measurement program. Starting field visits in June 2020, instead of August 2020, as occurred in 2010, will help improve recall on the part of respondents and improve the reliability of responses because of closer proximity to Census Day. While it is not clear from the *Federal Register* Notice how long the Person Interview operation will last, we

similarly urge the Census Bureau to take steps to complete this specific activity within as short a time period as operationally feasible, without sacrificing quality and thoroughness.

Recommendations:

1. Increase the sample size to account for the potential for reduced cooperation, both by householders and proxy respondents, with interviewers.
2. a) Assign Census Bureau interviewers to their local communities wherever possible. Tapping into the Census Bureau's professional field representative network is important to ensure the highest quality interviews, but interviewers must also be knowledgeable about the areas in which they will work, geographically, culturally, and linguistically. While we acknowledge this is challenging, given that the PES work is both geographically dispersed and modest in scale, hiring and deploying trusted community members as interviewers should be a priority.

b) Implement a waiver process to allow work-eligible legal permanent residents (i.e. green card holders) to apply for interviewer jobs. This would expand the pool of possible interviewers, making it easier to find a candidate with relevant cultural and linguistic knowledge.
3. Add gender and owner/renter status to the demographic information collected from respondent households.

We believe that adopting our recommendations will improve the accuracy and reliability of the information collected during the PES Person Interviews. This goal is essential to ensure that the dual system estimation methodology can produce robust net coverage measurement estimates for important demographic subgroups and geographic areas. Thank you for your attention to our comments. Please let us know if you would like to meet with us to discuss these concerns or if we can be of further assistance during this process.

Sincerely,

Indivar Dutta-Gupta (GCPI) and Denice Ross (Beeck Center)