

Shannon Wink
Program Analyst, Policy Coordination Office
U.S. Census Bureau
1401 Constitution Ave NW
Washington, DC 20230

December 22, 2022

RE: November 22, 2022 [Federal Register Notice](#) of proposed rulemaking and request for comments in regard to the Population Estimates Challenge Program, RIN number 0607-AA60

Dear Ms. Wink,

We are writing to welcome the Census Bureau's review of the Population Estimates Program, and the resumption of a population estimate appeals process. We also appreciate this opportunity to suggest changes in methods and data for the estimates themselves and criteria for appeals. We see improvement as the guiding principle for both.

The goal of the Census Bureau's Population Estimates Program is to produce accurate, annual total population estimates for the nation, states, counties, cities, and towns, and select demographic characteristics for the nation, states, and counties. This task has become even more critical now that population-based federal spending has increased to more than \$1.5 trillion a year. The Census Bureau's own Post-Enumeration Survey and Demographic Analysis studies revealed that differential undercounts persisted in 2020 and in some cases worsened. These undercounts, if not mitigated in the annual population estimates, misdirect federal and state funding. The population estimates should mitigate the differential undercounts in the 2020 Census documented by the Census Bureau's Post-Enumeration Survey and Demographic Analysis.

To accomplish this, the Census Bureau should invest in a year-round continuous research program that informs improving the base and identifies the most accurate methods and datasets for use in annual updates of the estimates. Any implementation of new privacy protections to the estimates should be fully researched, and vetted by external experts and the impacts of disclosure avoidance on utility of the data should be understood by stakeholders. In addition, the Census Bureau should build and maintain collaborative relationships throughout the decade with state, local and tribal governments to take in additional anonymized official datasets to improve the estimates. We recommend that the Census Bureau seek ongoing stakeholder input, both from government entities as well as from other organizations, including on the data sources and methodologies the Bureau should consider as well as on the ones it decides to utilize.

In support of these goals, demographic experts working with the Census Quality Reinforcement Task Force have submitted a detailed FRN response with specific recommendations that we commend to the Census Bureau. In particular, we share their recommendation for a change in

nomenclature. If successful appeals are properly viewed as the result of a cooperative partnership with local stakeholders to improve population estimates, then the adversarial term “Challenge Program” should be replaced with a more accurate term that reflects the spirit of cooperation engendered by the new program. “Improvement Program” is one possible option to underscore any change in approach. Even unsuccessful appeals provide opportunities for the Census Bureau to incorporate additional data and methods.

In closing, mitigating the measured shortfalls in the 2020 Census and building trust in Census Bureau data requires a more robust appeals process and investment in continuous research to take in new datasets and methodologies, to produce an accurate, fair and excellent statistical product.

Thank you for the opportunity to comment on the methodology used in the annual population estimates, and the methodologies and data accepted as part of the appeals process. We look forward to working with the Census Bureau to help build the partnerships necessary to produce the most accurate and fair annual population estimates.

Sincerely,

Allison Plyer, Chief Demographer
The Data Center of Southeast Louisiana
Census Quality Reinforcement Task Force Co-Chair

Cara Brumfield, Associate Director,
Economic Security & Opportunity Initiative, Georgetown Center on Poverty & Inequality
Census Quality Reinforcement Task Force Co-Chair

[Organizations]

Population Association of America

Esri

National League of Cities

Inter-university Consortium for Political and Social Research

The Data Center of Southeast Louisiana

Fair Count

The Southern Economic Advancement Project (SEAP)

American Anthropological Association

Association of Population Centers

Government Information Watch

National Community Development Association

National Disability Rights Network (NDRN)

PDRC International

SocialExplorer, Inc.

Abrazar, Inc.

Gang Free Inc

Demographic Analytics Advisors

Connecticut Data Collaborative
MACS 2030 - Minnesotans for the American Community Survey and 2030 Census
NC Counts Coalition
Allston Brighton Health Collaborative
Colorado Civic Engagement Roundtable
Housing Action Illinois
Metropolitan Council (Twin Cities)
Southern Echo Inc.
Fayetteville Police Accountability Community Taskforce
Chinese Community Center, Houston
United Senior Lao American Association (USLAA)
Siengkane Lao MN
Tri-Valley Opportunity Council, Inc.
Maxfield Research and Consulting, LLC
East Metro Strong
Nebraska Appleseed
Texas Demographic Center
Chinese Community Center, Houston
Spiritual Destiny Int'l Ministries
Project Cover, Inc.
Hmong American Partnership and Hmong National Development, Inc.
Northspan Group, Inc.

[Individuals]

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