

September 15, 2022

The Honorable Robert Santos
Director
U.S. Census Bureau
Washington, DC 20233

Dear Director Santos:

Thank you for your informative August 9th response to our letter dated July 19, expressing the philanthropic community's interest in ensuring a robust post-2020 Census Population Estimates Program (PEP) and meaningful challenge opportunity for local and tribal governments.

We are encouraged by the work the Bureau is pursuing to improve the accuracy of the estimates base in light of persistent and growing undercounts of the Black and Hispanic populations, American Indians living on reservation lands, and young children in the 2020 Census. We commend you and the Bureau for your willingness to consider a blended base that corrects systemic undercounts using results from Demographic Analysis and the Post-Enumeration Survey. The Federal-State Cooperative for Population Estimates network will certainly be a valuable partner for the Base Evaluation and Research Team (BERT) in identifying a wider range of administrative data, with strong privacy protections, to improve the quality of the base estimates.

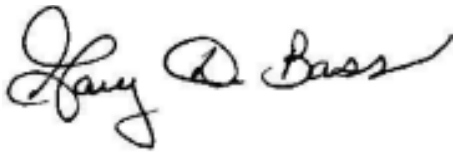
At the same time, we believe it is essential to include local governments in that effort, as many have access to additional datasets that document more realistic housing unit occupancy rates, such as utility data, and person-per-household rates, such as school enrollment records. While we recognize that municipal governments have not been allowed to challenge key variables in the estimates base previously, we urge you to consider modifications to the appeals process, as well as local consultation to improve the estimates base, that go beyond the narrow scope of the Challenge Program in the previous decades. The housing unit method you referenced could produce more accurate estimates in areas where the population is growing, as the Bureau's own research previously has shown.

The COVID-19 pandemic destabilized or isolated many neighborhoods at the height of 2020 Census operations, leading to inaccurate counts of both historically undercounted households and displaced population groups that otherwise might have been easier to enumerate, such as college students living off-campus. The unique circumstances surrounding the 2020 Census call for innovative approaches to right-sizing the census-derived population estimates going forward.

We appreciate your commitment to extensive stakeholder collaboration as you explore possible changes to the Population Estimates Program and annual appeals process that will help ensure accurate and equitable data throughout the decade.

We look forward to our continued dialogue on these important issues.

Sincerely,

A handwritten signature in black ink that reads "Gary D. Bass". The signature is fluid and cursive, with the first name "Gary" being more prominent.

Gary D. Bass
Consultant & Executive Director Emeritus, Bauman Foundation
Chair, Census Equity Initiative

A handwritten signature in black ink that reads "LaShanda A. Jackson". The signature is cursive and somewhat stylized, with the first name "LaShanda" being the most legible part.

LaShanda A. Jackson, MBA
Executive Director, Funders' Committee for Civic Participation

A handwritten signature in black ink that reads "Sol Marie Alfonso-Jones". The signature is cursive and flows from left to right, with the last name "Alfonso-Jones" being the most prominent.

Sol Marie Alfonso-Jones
Senior Program Officer, Long Island Community Foundation Chair, Funders Census Initiative, FCCP