



UNITED STATES DEPARTMENT OF COMMERCE
U.S. Census Bureau
Office of the Director
Washington, DC 20233-0001

August 9, 2022

To:

Gary D. Bass
Executive Director
Bauman Foundation
1255 23rd Street, Northwest
Washington, DC 20037

Ms. LaShanda A. Jackson
Executive Director
Funders' Committee for Civic Participation
45 West 36th Street, 6th Floor
New York, NY 10018

Sol Marie Alfonso-Jones
Chair, Funders Census Initiative
Funders' Committee for Civic Participation
45 West 36th Street, 6th Floor
New York, NY 10018

Dear Mr. Bass, Ms. Jackson, and Ms. Alfonso-Jones:

Thank you for your co-signed letter regarding the Census Equity Initiative and its support for possible improvements to and expanded resources for the Population Estimates Program (PEP). We understand the significance of the data products produced by PEP to all levels of government as well as private sector stakeholders for enabling efficient community planning, serving as inputs to key rates and measures about our nation's people and economy, and informing the allocation of funding. Following on the release of 2020 Census coverage measures and the questions inspired by these results, PEP is uniquely positioned to explore what changes to estimates processing may be possible to ensure that the U.S. Census Bureau maintains its commitment to accurate and equitable data.

As you acknowledged, certain programs are already in place to meet this need. In particular, the Population Estimates Challenge Program (hereafter, Challenge Program) has provided a longstanding opportunity for stakeholders to offer evidentiary support for PEP to improve the accuracy of the estimates. It is important to note that the Challenge Program is an opportunity for stakeholders to work with PEP to improve its measurement of change since the last Census – it is not an opportunity to propose revisions to the estimates base.

Prior to the decade following the 2010 Census, the criteria required to challenge an estimate were broader, as you have noted. Specifically, PEP would modify the standard methodology to accommodate challenges by allowing estimates that had been produced via alternate methods (the most common being the “housing unit method”) to supplant cohort-component-based estimates at the county level; and would also eliminate key sets of population controls generally imposed on county and subcounty estimates. However, extensive Census Bureau and external research revealed a large disparity between the accuracy of the methods used by the Census Bureau and the alternatives, with the Census Bureau’s methods found to be substantially more accurate.¹ The housing unit method, for example, was found to overestimate population, particularly for areas with slow growth or declining population. As a result of this research, PEP enhanced the Challenge Program in February 2013 to require challenges to provide additional data on one or more of the components used in the population estimates. The Census Bureau accepts a challenge when the evidence provided identifies the use of incorrect data, processes, or calculations in the production of the estimates. The Census Bureau is committed to continuing work to strengthen the Challenge Program. Before resuming the program this decade, PEP will collaborate with stakeholders to ensure that the program meets their needs while also fulfilling the strict quality standards required for estimates processing.

The Challenge Program has been thoughtfully devised to serve as a fair and efficient mechanism for ensuring the accuracy of the estimates. Whereas the structure and mission of the program may not provide an avenue to expand the use of administrative data in the estimates, the Census Bureau is pursuing other options for considering alternative data sources in estimates production. For example, the Base Evaluation and Research Team (BERT) has specifically been formed to research the feasibility of taking coverage measures such as the Post-Enumeration Survey (PES) and Demographic Analysis (DA) and other administrative records into account in the development of the April 1, 2020 estimates base. In your letter, you encourage this team to consider data from states and localities which could be leveraged to “better capture historically undercounted groups.” The Census Bureau is proud of its longstanding relationship with the representatives in the Federal-State Cooperative for Population Estimates. State FSCPE agencies, designated by their respective governors, work in cooperation with the PEP to produce population estimates and likewise will serve as valuable resources for the base population research. Additionally, the BERT research includes partnering with the Census Bureau Frames Project to assess the suitability of administrative data sources for researching coverage issues, including for targeting populations.

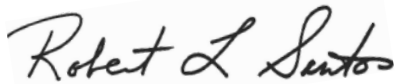
¹ U.S. Census Bureau. 2008, “A Summary of Findings from the Housing Unit-Based Estimates Research Team.” Presented at the U.S. Census Bureau Seminar: Housing Unit-Based Estimates Research, Suitland, Maryland, June 17, 2008.

An endeavor of this magnitude will take time. During that time, BERT will be prioritizing collaboration with stakeholders and creating opportunities for states to contribute feedback and ideas regarding sources of administrative data and proposed methodological improvements to the estimates. The Census Bureau will strive to keep stakeholders informed of progress along the way.

In these efforts, we are committed to examining the resources needed to cultivate an infrastructure that prioritizes estimates improvement, including potential updates to the April 1, 2020, estimates base. Other possible research could focus on how we estimate the components of change, all with the goal of producing the most accurate estimates possible of our nation's population.

Thank you again for your support of the PEP and your continued commitment to the quality of Census Bureau data. If you have any questions, please contact Ms. Christine Hartley, Assistant Division Chief for Estimates and Projections, at christine.hartley@census.gov.

Sincerely,

A handwritten signature in black ink that reads "Robert L. Santos". The signature is fluid and cursive, with the first name "Robert" and last name "Santos" clearly legible.

Robert L. Santos
Director