



The Census Project

October xx, 2020

**Ensure an Accurate 2020 Census; Allow Sufficient Time for
Data Processing and Quality Assurance**
The census isn't over when the counting stops

Dear Senator,

On behalf of The Leadership Conference on Civil and Human Rights, the Census Project, and the undersigned organizations, we write to underscore the importance and urgency of extending statutory reporting deadlines for apportionment and redistricting data, to give the U.S. Census Bureau sufficient time to thoroughly implement complex data processing activities and complete the most accurate 2020 Census possible. The bipartisan 2020 Census Deadline Extensions Act (S. 4571) would extend the statutory deadlines for delivering apportionment and redistricting data to April and July 2021, respectively, as the administration requested in April 2020. We urge your support for timely action on the provisions in this bill.

The Census Bureau currently faces a December 31, 2020 statutory deadline to produce census numbers for congressional apportionment, and an April 1, 2021 deadline to transmit redistricting data to the states.ⁱ However, the coronavirus pandemic disrupted or delayed literally every 2020 Census operation, leading the bureau to announce, in April, an extension of data collection through October 31, and to request — with the administration's full support — additional time for data processing. Failure to push back the statutory reporting deadlines is forcing the Census Bureau to *cut short* critical 2020 Census data processing and quality check operations from the usual five months down to only two and a half months.

The government acknowledged in recent court proceedings related to the census timeline that the Census Bureau cannot finish data processing by December 31 if counting operations continued past early October. Independent agency overseers and senior bureau officials have said that a rushed timeline will jeopardize the quality and accuracy of final census data. For example, according to the Commerce Department Inspector General, "The streamlined data processing under the accelerated census plan poses a myriad of risks to accuracy and completeness."

That is why Congress must, in accordance with its constitutional responsibility, set a clear path forward by pushing back the reporting deadlines. We urge you to do your part to ensure an accurate census and push back the statutory deadlines for delivering apportionment and redistricting data to April and July 2021, respectively, as the administration requested in April 2020.

Following the U.S. Supreme Court's decision on October 13 to grant the Trump administration's request to halt census counting operations, the Census Bureau announced that data collection would end on October 15. It is important to note that "completing" the count of nearly 100 percent of homes does not mean the census is accurate. In fact, more people could be missed or counted in the wrong place in a rushed operation because the bureau must enumerate more households using less reliable information from neighbors, administrative records, and statistical methods. Now the bureau needs to undertake a painstaking, complex, and highly specialized series of activities to process and improve the accuracy of the raw data that it has collected from 150 million

housing units and thousands of group facilities, and from people experiencing homelessness or living in transitory locations (e.g., RV parks).

Under the pre-pandemic 2020 Census timeline, that critical work would have taken five months. (The Census Bureau, with the administration's support, requested six months for this phase in its COVID-adjusted operational plan,ⁱⁱ in recognition of the greater challenges to collecting accurate data in the field caused by pandemic-related delays and disruptions to every census operation.) The April 2020 COVID-adjusted timeline set an April 30, 2021 deadline for reporting apportionment data to the president and July 31, 2021 deadline for sending redistricting data to the states. However, in late July, Commerce Secretary Wilbur Ross asked bureau officials to develop an accelerated timeline that essentially compelled the Census Bureau to rush remaining counting operations and compress data processing and quality assurance. Data collection through self-response and the door-knocking operation was cut short by a month, with an end date of September 30 instead of the previously announced October 31. Data processing activities designed to take 153 days, before the pandemic derailed the original 2020 Census plan, would have to be done in 92 days under the accelerated plan, in order to meet the current apportionment deadline.

A number of cities, counties, and stakeholder organizations challenged the accelerated timeline in court, resulting in a preliminary injunction that required data collection to continue beyond September 30; a federal appeals court upheld the longer data collection period, although the Supreme Court granted the administration's motion for an emergency stay of that Order. As a result of pandemic-related delays in data collection, and then the administration's decision to drop its support for extending the reporting deadlines, the Census Bureau is left with woefully insufficient time to process, improve, and tabulate the data it has collected under already difficult circumstances.

The shortened timeline requires the bureau to "streamline" many components of post-data collection activities. Once data collection ends, much work remains to ensure the accuracy and quality of data that are used for apportionment, redistricting, and allocation of federal funds. These time-tested data processing and quality assurance activities involve, among other tasks, reconciling data collected through numerous methods; checking for incomplete responses; eliminating duplicate responses from the same household or for people counted at two different addresses; resolving inconsistent or erroneous enumerations; and applying statistical methods to fill-in missing information. Agency and external experts also review preliminary tabulations several times, to spot notable deviations from independent population estimates that might indicate processing mistakes. Each step must be done thoroughly before moving on to the next, in case errors in processing require reruns that would be difficult to fix later.

A rushed census during a pandemic inevitably will lead to misallocation of political representation, government funding, and private sector investment in every state and community. If data processing operations are not thorough, communities most in need of resources to improve quality of life and standards of living will not receive their fair share for the next decade. Accurate data from the 2020 Census are critical to informed decision-making and resource allocation by the public and private sectors, including preparation for and recovery from natural disasters and public health crises.

Unless Congress steps in *now* to save the census, the loss to the nation for the next decade will be incalculable. Congress must provide the certainty of extended deadlines and ensure sufficient time for data processing and quality assurance in accordance with the Census Bureau's high standards. If you have any questions about the issues raised in this letter, please contact Corrine Yu, Leadership Conference Senior Program Director, at yu@civilrights.org, or Mary Jo Hoeksema, The Census Project, Co-Director, at atmaryjo@popassoc.org.

Sincerely,

The Leadership Conference on Civil and Human Rights
The Census Project
ORGANIZATIONS

ⁱ 13 U.S.C. §141(b) & (c)

ⁱⁱ Issued April 13, 2020.