



RESEARCH REPORT

Administrative Records in the 2020 US Census

Civil Rights Considerations and Opportunities

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Foreword

In this time of great uncertainty, we know one thing for sure: There will be a census in 2020.

Article I, Section 2 of the United States Constitution places the census at the core of our democratic system of governance by requiring a count of the nation's population every 10 years. The information provided by the census and the related American Community Survey form the cornerstone of knowledge about the American people. It is the basis for virtually all demographic and socioeconomic information used by policymakers, educators, and community leaders.

We also know that, when it comes to the census, Congress will continue to cast a laser-like focus on controlling costs, without fully understanding how reductions can affect an accurate and equitable census.

Given the spending directives emanating year after year from both the House and Senate Appropriations Committees, the Census Bureau is under enormous pressure to use bold new methods and operations that hold the promise of significant cost savings in 2020.

One strategy the Census Bureau is exploring would use administrative records to identify vacant or nonexistent housing units and obtain missing information about some unresponsive households. However, the implications of such a methodology are unclear. Does the proposed methodology meet rigorous scientific standards, and for which subpopulations would it be effective? What assumptions about the quality of the administrative records have been made? What are the costs, benefits, and risks of this approach?

Our organizations—The Leadership Conference on Civil and Human Rights and the Georgetown Center on Poverty and Inequality—appreciate the objectives both to modernize the census process and to keep costs in check. We also understand how accurate, comprehensive census data empowers all communities, especially the underserved.

To further these ends, we came together with the Urban Institute to convene an expert panel to bring the voice of stakeholders—specifically those conducting research and advocacy on behalf of vulnerable populations—to the attention and planning process of the Census Bureau's Decennial Census Program staff responsible for administrative records and data linkage. At the convening, leading experts in the use of federal and state administrative records for policy research and representatives of the civil rights community discussed accuracy and the appropriate use of such data for enumerating households. Panelists offered suggestions, cautions, and recommendations on the benefits and risks of administrative data for the US population in general and for vulnerable subpopulations, including the

impoverished, immigrants, the homeless, and those participating in government assistance. This report by the Urban Institute staff describes that discussion and insights from it.

Balancing seemingly conflicting objectives is challenging, especially when the consequences of one approach over another are not always readily apparent. Given the importance of the census, those with a stake in these different priorities must pay close attention to how this balancing act plays out.

Thankfully, it's not too late to advance these priorities concurrently. This report lays out concrete steps that the Census Bureau can take—on its own and in partnership with the civil rights community—so stakeholders have confidence that a broad use of administrative data will neither compromise census accuracy nor undermine the goal of eliminating the differential undercount.

Counting every person residing in the United States is a difficult endeavor. When people are missed in the census, we do not receive the equal voice to which we all are entitled. As a result, our government and communities are unable to receive their accurate share of federal and state funding for schools, crime prevention, health care, and transportation. An accurate census directly affects our nation's ability to ensure equal representation and equal access to important governmental resources for all Americans, and thus must be regarded as one of the most significant civil rights issues facing our country today.

Working together, we can ensure that everyone is counted.



Wade Henderson, President & CEO, The Leadership Conference on Civil and Human Rights



Peter Edelman, Faculty Director, Georgetown Center on Poverty and Inequality

Executive Summary

The constitutionally mandated decennial census of the population is increasingly challenging for the US Census Bureau. In large part, this is due to the difficulty in counting the last 10 to 20 percent of the population, which represents some of the country's most vulnerable households. As a result, the cost of the decennial census in constant dollars has risen almost fivefold between 1980 and 2010, and the per capita cost in constant dollars has almost doubled. The Census Bureau has tried new technology with mixed success.

Over the past decade, the advent of the “big data” has opened new possibilities for more cost-effective enumeration. Specifically, administrative records (AdRecs) could help the Census Bureau more accurately identify and count households that it would otherwise miss in the census, as well as more efficiently count households that would normally require more expensive in-person visits. The Census Bureau has been working on an administrative records-based solution to address the high cost of field enumeration and plans to use this approach in a limited manner in 2020.

The Census Bureau has researched the use of administrative records in enumeration for decades, yet the full implications of such a methodology are still unclear. How accurate is the methodology for different subpopulations? What assumptions about accuracy have been made? What are the costs, risks, and benefits of this approach? Understanding the proposed methodology and the substantive consequences of incorporating it in the census is as critical as understanding the benefits. This is especially true for subpopulations that may have their civil rights affected as a consequence of this new approach.

To address this issue, the Urban Institute, the Georgetown Center on Poverty and Inequality, and The Leadership Conference on Civil and Human Rights convened an expert panel to discuss and identify the key civil rights implications of incorporating administrative records methodologies into the decennial census. The convening brought together representatives of those conducting research and advocacy on behalf of vulnerable populations with representatives of the Census Bureau's Decennial Census Program staff responsible for administrative records and data linkage. These leading experts in the use of federal and state administrative records for policy research and representatives of the civil rights community discussed accuracy and the appropriate use of such data for enumerating households. Representatives of the Census Bureau briefed the panel on the current status of administrative data planning and presented findings from their own research. Panelists then discussed their own experiences and offered suggestions, cautions, and recommendations on the benefits and risks of using

administrative data in general, and for vulnerable subpopulations, including the impoverished, immigrants, the homeless, and those participating in government assistance programs.

This report discusses the Census Bureau's plan for using administrative records in the 2020 Census, potential implications, and concerns of the civil rights and research communities. It also presents recommendations distilled from the convening on ways the Census Bureau and the civil rights community can collaborate to improve the accuracy and efficiency of the 2020 Census, including the following:

- the Census Bureau can improve communication to the civil rights community and constituencies about the decennial census process, procedures, and protections;
- the civil rights community can help the Census Bureau navigate the intricacies of state and local government systems and data repositories; and
- the Census Bureau and civil rights community can collaborate to improve the efficient and accurate processing of data from hard-to-count populations.

Introduction

Conducting the decennial census has become increasingly challenging for the US Census Bureau, due largely to the difficulty of counting the last 10 to 20 percent of the population, which includes some of the most socially and economically disadvantaged households. As a result, the cost of the decennial census in constant dollars has risen almost fivefold between 1980 and 2010, and the per capita cost in constant dollars has almost doubled. The Census Bureau has tried new technology with mixed success. For example, the Census Bureau abandoned efforts to use handheld devices in the 2010 Census but has successfully introduced a cost-effective Internet-based alternative to paper forms of the American Community Survey (the Census Bureau plans to add this Internet-based participation option to paper questionnaires and telephone responses for the 2020 Census).

Over the past decade, the advent of the “big data” has opened new possibilities for more cost-effective enumeration. Specifically, administrative records could help the Census Bureau more accurately identify and count households that it would otherwise miss in the census, as well as more efficiently count households that would normally require more expensive in-person visits. The Census Bureau has been working on an administrative records-based solution to address the high cost of field enumeration and plans to use this approach in a limited manner in 2020.

The Census Bureau has researched the use of administrative records in enumeration for decades, yet the full implications of such a methodology are still unclear. How accurate is the methodology for different subpopulations? What assumptions about accuracy have been made? What are the costs, risks, and benefits of this approach? Understanding the proposed methodology and the substantive consequences of incorporating it in the census is as critical as understanding the benefits. This is especially true for subpopulations that may have their civil rights affected as a consequence of this new approach.

To address this issue, the Urban Institute, the Georgetown Center on Poverty and Inequality, and The Leadership Conference on Civil and Human Rights brought together 30 experts in policy analysis, civil rights, and state and federal administrative data to identify and discuss common threats and opportunities regarding the use of AdRecs in the 2020 Census. The purpose of the all-day roundtable—held on November 10, 2016, and funded by the 2020 Census Project—was to bring the voice of the civil rights community to the planning process of the Census Bureau’s Decennial Census Program staff responsible for administrative records and data linkage. Specific objectives included

- to better understand the proposed uses of AdRecs in the 2020 Census, as well as the timetable and standards for making final design decisions;

- to communicate questions or concerns about the use of AdRecs to the Census Bureau; and
- to provide ideas for how to improve the 2020 Census.

The convening sought to elicit questions and concerns about the use of AdRecs from a civil rights perspective, explore the possibilities of unanticipated consequences, and identify new opportunities for using AdRecs to count vulnerable populations. During the morning, senior Census Bureau staff briefed participants on how the Census Bureau will use AdRecs in the 2020 Census, presented information about their ongoing research and testing, and answered questions from the group. In the afternoon, the civil rights and research representatives broke into small groups to discuss the implications of the Census Bureau's plan and offer suggestions for future actions to improve the census.

Importantly, at the time of publication, there is little room to change the AdRecs foundational approach for the 2020 Census; the Census Bureau set the basic architecture in 2016. However, the implementation details have not yet been finalized, and the Census Bureau appreciates the value in considering suggestions from stakeholders. Opportunities exist for the Census Bureau and the civil rights community to influence the execution of the AdRec methods and protocols—both independently and collaboratively—to achieve a more fair, accurate, and efficient census in 2020.

This report discusses the Census Bureau's plan for using administrative records in the 2020 Census, potential implications, concerns of the civil rights and research communities, and recommendations distilled from the convening. This report aims to provide both an understanding of what will happen in the 2020 Census and a productive basis for a mutually beneficial collaboration between the Census Bureau and the civil rights community.

Census Purpose, Procedures, and Importance

The Census Bureau conducts the decennial census in accordance with a constitutional mandate to provide regular enumerations of the resident population in the United States. The results of the census provide the basis for apportionment and redistricting (political representation), resource allocation, and community investments (e.g., locating schools, fire stations, stores, and roads).

Throughout its 230-year history, the Census Bureau has used technology and ancillary data sources to make its counting operations and data processing methodologies more efficient. The following section provides an overview of planned changes in the 2020 Census, specifically as they relate to administrative records.

How the Census Has Operated

To assess the number of people living in the United States, the Census Bureau historically went house to house and collected survey data on population indicators. In the 1960s, the Census Bureau, in partnership with the US Postal Service (USPS), began mailing out the survey instrument and employed enumerators to collect completed surveys and help create a master address list. For the 1970 Census, the Census Bureau used a mail-back strategy instead of enumerators to pick up completed surveys.

The Census Bureau started to develop a complete address list for the population, which was necessary for this methodology of data collection. In urban areas, the Census Bureau used commercial address lists, a US Postal Service review process, and a validation process called “pre-census address canvassing” to build its list. In rural areas, the Census Bureau relied primarily on on-the-ground canvassing.

When planning the 2000 Census, the Census Bureau started with a master address file (MAF) that it had developed for the 1990 Census. In urban and suburban areas, “address listers” walked every census block a year before the census to verify and update the MAF. In rural areas, census takers went door-to-door to verify and update the address list and drop off a questionnaire or enumerate the household on the spot. The Census Bureau also continually checked its database against the USPS delivery sequence file (DSF). In 1994, the Census Bureau benefited from a new program directed by Congress: the Local Update of Census Addresses (LUCA) operation.¹ LUCA required the Census Bureau to share preliminary address lists with state, local, and Tribal governments so they could review the information

confidentially and submit updates and corrections. The Census Bureau updated its MAF with the latest version of the DSF between 2000 and 2009 in preparation for the 2010 Census. As a result of continually monitoring and updating the MAF, the Census Bureau was able to streamline its nationwide address canvassing to a single operation.

Civil Rights Concerns

The MAF contributed to the 2010 Census providing a very accurate total population count. The accompanying census coverage measurement (CCM) program estimates census enumeration errors overall and for population subgroups. CCM found a total net population overcount of 0.01 percent, an improvement over previous censuses. However, following a historic pattern, the 2010 Census undercounted some demographic groups at disproportionately high rates, while it overcounted non-Hispanic whites. For example, non-Hispanic blacks and Hispanics experienced a net undercount of 2.1 and 1.5 percent, respectively, while non-Hispanic whites had a net overcount of about 0.8 percent. Consequently, even though the overall accuracy in the 2010 census was improved, those improvements did not reflect the larger inaccuracies in the enumeration of specific subpopulations.

If the over- and undercounting of subpopulations were random and small, the inaccuracy would be less of a concern. In that case, inaccuracies in enumeration would not systematically favor one subpopulation over another. However, since the 2000 Census, the Census Bureau has overcounted non-Hispanic whites while continuing to undercount minority groups, with the offsetting errors contributing to an accurate census overall—that is, a net over- or undercount near zero at the national level. This recurring pattern raises civil rights concerns for those underrepresented subpopulations.

From a civil rights perspective, improved census accuracy for vulnerable and underserved populations, especially at the neighborhood and local level, is an important and foundational factor in achieving greater equality in political representation; allocation of federal, state, and local resources; and private investment in community development and infrastructure. Racial and ethnic minorities in the United States tend to have lower household incomes, be concentrated geographically, have larger families with children, and historically demonstrate disparities in outcomes related to health, wealth, education, employment, food security, criminal and social justice, and housing. Similar concerns exist with vulnerable subpopulations, such as immigrants, the homeless, disabled veterans, young children, and LGBT people. As such, the civil rights community recognizes obtaining both an accurate census overall and an accurate census of vulnerable subpopulations is a core motivation for the preservation of civil rights, which also makes them a critical stakeholder in the decennial census.

Administrative Records in the 2020 Census

More so than in the past, the Census Bureau will use administrative records to implement the decennial census. Specifically, it will use AdRecs in the 2020 Census to

1. refine the list of residential addresses, including group facilities, to be included in the census;
2. determine whether households that do not self-respond are vacant or occupied;
3. optimize the times of day field staff visit nonresponding addresses; and
4. impute the characteristics of nonresponding households if and when high-quality AdRecs exist.

For refining the address list (#1) and optimizing visit times (#3), in particular, the Census Bureau will rely on commercial or third-party data, in addition to AdRecs.

The Census Bureau has taken deliberate, well-planned, and evidence-based steps toward the use of governmental administrative records databases and third-party data sources in decennial census operations. From a business perspective, the use of AdRecs provides a way to cut costs while maintaining and possibly increasing quality. The objectives are to increase the efficiency of the survey operations, reduce field costs, and ultimately increase enumeration accuracy. The Census Bureau cited several advantages of using AdRecs, including

- making it easier for people to complete their census forms,
- reducing the cost of collecting census data,
- creating new products and information for consumers of census products, and
- increasing the research potential of census data to the benefit of society.

The Census Bureau has considered various governmental records and third-party data in developing its administrative records strategy for the 2020 Census, including microdata collected by administrative agencies (e.g., DSFs, Social Security records, and Internal Revenue Service filing data) and household and personal data from commercial firms (e.g., demographics from credit bureau data and property tax and deed data). Examples of potential governmental administrative records and third-party data that will support the 2020 Census include the following:

- **Federal administrative records:** Internal Revenue Service Tax Returns (Form 1040), Medicare and Medicaid Enrollment Database, USPS DSF, and the Social Security Administration Numerical Identification System (Numident)
- **State administrative records:** Supplemental Nutrition Assistance Program (SNAP) and Women, Infants and Children (WIC) participant data (both programs are federal-state partnerships)
- **Third-party data:** Experian End-Dated Records File and In-Source File and CoreLogic Property Tax and Deed Data File

The Census Bureau intends to incorporate AdRecs assembled from these sources into census operations concerning maintaining the address list and updating it through address canvassing, nonresponse follow-ups, field contacts, and addressing unresolved nonresponses. This section describes how the Census Bureau plans to use AdRecs in each of these operations, beginning with the first step of maintaining and updating the address list.

List Maintenance and Address Canvassing (AdCan): Updating the List of Residential Addresses Included in the Census

The Census Bureau will use administrative records, along with commercial data sources and aerial imagery to help update and maintain the residential addresses list. To help contain costs for the 2020 Census, the Census Bureau plans to use AdRecs, third-party data, and aerial imagery to evaluate, verify, and update the MAF “in-office.” Those procedures will greatly reduce the need for costly, labor-intensive “in-field” address canvassing. As of the writing of this report, the Census Bureau plans to verify roughly 70 percent of the MAF using “in-office” methods, while sending address listers to check on the remaining 30 percent of addresses in person.

To conduct “in-office” address canvassing, the Census Bureau plans to use a range of administrative data sources, including the following:

- US Postal Services Delivery Sequence File (DSF)
- Local Update of the Census Addresses (LUCA)
- Tribal, State, and Local Government Address lists
- Commercial address lists

Before the census, occupied addresses on the list receive a mailed invitation to complete the census online, and a second mailing reminding them to complete their census. The housing units that do not respond will receive a second reminder mailing, then a mailed census, then a third mailed reminder. If at that point a household still has not responded, it is added to a list for nonresponse follow-up.

Nonresponse Follow-Up (NRFU): Determining Whether Households That Do Not Self-Respond Are Vacant or Occupied

The Census Bureau will use AdRecs to remove vacant and nonexistent housing units from the nonresponse follow-up workload. The Census Bureau will rely primarily on information from the USPS Undeliverable As Addressed (UAA) dataset but is also researching several additional data sources that can be used to identify vacant units.

Where the AdRecs strongly indicate a housing unit is vacant, the Census Bureau will send an additional mailing to confirm that particular housing unit is vacant. If someone from the housing unit responds to the mailing (i.e., indicating the housing unit is not vacant), that address will receive a census. If no one responds to the mailing (i.e., further suggesting the housing unit is vacant), the Census Bureau will check the AdRecs a second time to be confident the unit is vacant before removing it from the list of addresses for the census.

Where the AdRecs do not initially provide a clear indication a housing unit is vacant, the Census Bureau will make a first in-person attempt to determine whether the housing unit is vacant. When a determination is not possible from the first visit, AdRecs are checked a second time. If they provide a sufficient level of confidence the unit is vacant, the same procedure for the prior paragraph is used (a mailing and an additional check of the AdRecs). If the AdRecs do not provide a sufficient level of confidence the housing unit is vacant, the Census Bureau makes another in-person field visit.

The Census Bureau appears committed to using AdRecs only where they have a sufficiently high degree of confidence a housing unit should be considered vacant. Where AdRecs do not achieve this degree of confidence, the Census Bureau relies on the original procedures from before AdRecs were incorporated into the process. In this way, the Census Bureau is attempting to maintain at least the level of data quality achieved in previous censuses.

To state this another way, the new AdRec procedures should allow the Census Bureau to more quickly and efficiently reach the same level of confidence about the occupancy of a given housing unit as the earlier method. The new procedures should require fewer resources to reach the same level of confidence. For the cases in which AdRecs do not provide at least as much confidence as the prior method, the Census Bureau continues to handle those cases as it did before the implementation of the AdRec procedures. As a result, the Census Bureau addresses some cases as well as or better than before with fewer resources, and it processes the remaining cases exactly the same as before.

Field Contacts: Optimizing when Field Staff Visit Nonresponding Addresses

For households that are not vacant, but do not self-respond to the 2020 Census, the Census Bureau will employ enumerators to make at least one in-person contact to collect information. The Census Bureau will use AdRecs and other third-party sources to help determine the optimal time of day for an enumerator to visit the particular housing unit to increase the chances someone will be at the unit during the visit.

Unresolved NRFU Cases: Imputing Characteristics of Nonresponding Households

Where after five mailings and two in-person field visits, the Census Bureau still cannot determine whether a housing unit is occupied and should receive a census, it will impute (i.e., statistically estimate) the count of people in these households. In the 2010 Census, 0.4 percent of all addresses required count imputation. To the extent possible, AdRecs and other census responses will be used to impute the characteristics of these persistently nonresponding households.

At the time of the convening, the Census Bureau suggested that the following characteristics may be generated through AdRecs:

- name
- age/date of birth
- sex
- race

- Hispanic origin
- relationship
- tenure
- detailed vacancy reason

The Census Bureau will determine the final census questions and characteristics in the future. These records will be designated as “imputed” in the final census datasets.

Next Steps in the Census Bureau’s Plan for Administrative Records

At the time of the convening, the operational plans for using AdRecs in the 2020 Census were largely in place, and the Census Bureau was refining them in advance of the 2018 End-to-End Census Test, which is a trial of the entire census approach before final census preparations. The operational development phase followed a significant research and testing period, building on reengineering efforts that date back to at least the previous two decennial censuses. The principal focus of the research and testing phase was to demonstrate the effectiveness and prudence of using AdRecs at various stages of the census process, with a goal of maintaining the highest possible level of scientific integrity and accuracy.

In developing, testing, and adopting its AdRec strategies, the Census Bureau focused on cost efficiency, data quality, and production of an accurate enumeration of the US population. However, as seen in previous decennial censuses, overall enumeration accuracy can be high, while the accuracy of the count of population subgroups can vary. While the Census Bureau designed its plans for using AdRecs in the 2020 Census to improve the accuracy of the results, there are concerns about how these new procedures might lead to unrecognized consequences for historically marginalized and vulnerable populations. These potential consequences and how they are affected by the use of AdRecs are the basis of the civil rights concerns about the decennial census.

Concerns about the Civil Rights Implications of Incorporating Administrative Records into the Census

The Census Bureau’s primary motivation for incorporating AdRecs into the decennial census is reducing costs while maintaining—if not improving—the current standard of data quality. This is laudable, given the ever-present need to improve government efficiency. It is also prudent, given the ever-present uncertainty of funding for conducting the census. However, incorporating AdRecs should only be considered effective if all households and people are equally represented and it does not increase the systematic over- or undercounting of any subpopulation.

The ideal over- and undercounts should be zero. As noted earlier, although the 2010 Census headcount was highly accurate nationally, it was the result of subpopulation over- and undercounts that canceled each other out, to produce a near zero national net undercount. The overall accuracy of the total population count was laudable. However, the primary uses of census data do not rely on national-level counts.

NOTE ABOUT THE NATURE OF THE PARTICIPANTS’ CONCERNS RELATIVE TO THE CENSUS BUREAU’S PRESENTATIONS

It is important to recognize these concerns were provided *ahead* of the convening and before the participants had the benefit of the Census Bureau’s presentations and questions and answer period. Their concerns were shared with the Census Bureau staff before the convening. As a result, staff were able to more directly address these concerns during their presentations at the convening.

During the convening, the civil rights community expressed that an ideal census is one that is both fair and accurate (i.e., it should contain as little error as possible, but no bias). In practice, this means similar levels of enumeration accuracy should be achieved for all demographic subgroups—vulnerable and nonvulnerable populations, alike. Undercounting vulnerable, hard-to-count populations and their corresponding communities while concurrently overcounting “easier-to-count” populations (e.g.,

middle- and upper-income families in suburban areas with clear, stable, and well-documented addresses) may produce an overall highly accurate count of the US population. However, when such results mask large over- and undercounts across populations, it can contribute to disparities in resource allocation, apportionment and redistricting (political representation), and community investments (e.g., locating schools, fire stations, stores, and roads). These disparities can negatively affect the livability and sustainability of communities of vulnerable, hard-to-count populations, such as racial-ethnic minorities, American Indians on tribal lands, families with very young children, immigrants, LGBT people, and the homeless.

The central civil rights concern about using AdRecs in the decennial census is that vulnerable and hard-to-reach subpopulations may be systematically underrepresented by the new procedures. These subpopulations may not have the same body or quality of administrative records as other groups, which would affect the Census Bureau's ability to survey these subpopulations in the same way. As a result, these groups may not only miss the benefits of a more accurate count experienced by other groups with more extensive AdRecs, they may actually be misrepresented due to a lack of data that are assumed to exist but do not.

“In general, my concerns about Census Bureau reliance on administrative records also stem from the extensive research literature showing that the most socially and economically marginal subpopulations are most at risk of census omission and that these same populations are not included or, still more problematically, are erroneously represented in administrative data sources.”

This central problem could manifest in various civil rights consequences. In advance of the convening, participants representing research and civil rights communities shared their concerns about the ways AdRecs might affect vulnerable populations.

Cost Concerns

Many participants expressed concerns about the potential costs of using AdRecs effectively and correctly with historically vulnerable groups. Recognizing the Census Bureau's budget and capacity for researching and testing the effectiveness of AdRecs have been "compromised across the decade." Because of these constraints, one participant was specifically concerned that the predictive models on which the Census Bureau currently operates are inadequate and will lead to an "insufficient allocation of resources."

More generally, participants worried that "the Census Bureau will fall short of the planned uses of administrative records and be unable to achieve the cost savings that have been projected from such uses." They anticipated Congress may not be able to provide sufficient funding to account for such types of spending over-runs, with a reduction in the quality of census data the likely consequence.

Amplifying Misrepresentation and Bias

Participants expressed concern that reliance on AdRecs, which are themselves subject to error and bias, have the potential to introduce or amplify those errors and biases in the population characteristics data generated through the decennial census. They were concerned that, particularly as racial and income disparities continue to rise, these administrative sources for imputation and operational planning will limit the Census Bureau's ability to produce accurate numbers. Participants were worried that the Census Bureau will not take "necessary steps to actually improve the MAF" because of its over-confidence in the new AdRec methods.

AdRecs Dataset Completeness

People who do not routinely interact with society's public institutions are less likely to be represented in administrative records (i.e., they are more "off the grid"). Participants expressed concern this includes many who are homeless, undocumented immigrants, formerly incarcerated people, and runaway or trafficked youth. Assuming these vulnerable populations are less likely to enroll in services or be represented in relevant databases, drawing AdRecs from these databases would provide little or no information about these "hidden" people. The limited information about these people that may still be found in these sources could be more likely to be incomplete or inaccurate (e.g., emergency room visits

by undocumented immigrants or the homeless). Such hidden populations may exemplify a subgroup for which there are simply no AdRec substitutes for door-to-door visits.

Young children—especially children of color—have been historically undercounted at disproportionately high rates compared to all other age cohorts. During the convening, Census Bureau staff reported that in the last census, two-thirds of uncounted children were black or Hispanic. One of the higher rates of undercounts occurred for children from birth to age 4. It is not clear whether the current proposed uses of AdRecs can prevent a repeat of this undercount; arguably, those uses could exacerbate the problem. For instance, AdRecs may be useful for identifying easier-to-count children, thus leaving the most vulnerable uncounted (again). This could easily be the case when using the Numident file (the file of applications for Social Security numbers) to help identify omitted infants. The processes by which children of undocumented immigrants appear in AdRecs are complicated and vary from state to state. As a result, such children may remain uncounted.

“A seriously undercounted population of concern to me are immigrants, and it is obvious that [children of] undocumented immigrants, in particular, are not represented in many standard datasets, and/or that the administrative datasets being used are developed and maintained at the county or state level and are not, in fact, comparable. If a particular type of dataset is used in one jurisdiction and not another, the inherent problems in using such data sources are further exacerbated (e.g., California’s state Medicaid program recently began serving all income-eligible children without regard to immigration status, but, to my knowledge, no other states have, and, in any case, enrollment is certainly not 100 percent).”

Some hard-to-count populations, like Asian Americans and Native Hawaiians and Pacific Islanders, may be missing from AdRecs because these databases do not provide data as detailed as typically enumerated in the census. Further, administrative records may not be able to accurately reflect recent births or deaths. For these reasons, participants shared a general concern that AdRecs may introduce less accurate data into the final results.

“One of the concerns we would like to flag, and possibly discuss during the convening, is about the idea to use tax returns to count/describe immigrant populations. With an important share of the unauthorized who either use fake SSNs and file taxes or do not file taxes at all, there is a significant chance to misunderstand the profile of this population. Because there are 5 million children who live in mixed-status households (i.e., with at least one unauthorized parent), lack of correct information about the parents will undermine our understanding of family background characteristics of these children.”

AdRecs Data Accuracy

Researchers and the civil rights community are also concerned about the varying quality of underlying AdRecs data sources. In particular, participants raised concerns about the procedures for developing administrative data sources and the accuracy of the resulting data.

“I am particularly concerned about reliance on administrative records for developing the Master Address File (MAF). As part of our recent efforts to consider ways in which the LUCA process might serve as a platform for identifying and including in the MAF low-visibility and unusual housing, I have reviewed a good deal of literature and analysis regarding housing units omitted from the MAF. Moreover, I know from my own survey research in rural communities with concentrations of immigrants how many housing units are actively concealed and, thus, very likely to not be evident in any standard administrative dataset.”

Beyond the accuracy of the data, several participants expressed concerns that even the constructs represented within the AdRecs may be skewed so the data *cannot* accurately represent the entire population.

Skewed Constructs within Administrative Records

Administrative records may not define certain constructs that are important to the correct enumeration of some subgroups. For example, at the convening, participants raised the case of counting same-sex couples. This information would be collected in the census household relationship question, which determines how each person in a household is related to the “householder”—that is, the person who completes the census form on behalf of everyone else in the housing unit. Several participants expressed concern that many AdRec datasets may not represent accurate relationships among the people in each household.

“The census is one of the few places where same-sex couples are counted on a national scale. We use the statistics from the 2010 Census in our advocacy constantly, and they help lend credibility to our anecdotal evidence around the needs of LGBTQ folks. Because we are a small population, even a tiny error in computation translates into a significant difference in the resultant statistics. Administrative records will not, by and large, capture ‘relationship to householder’ in a manner that will include same-sex couples.”

Thus, there is a concern that a greater reliance on AdRecs that may not properly represent the constructs they are expected to measure will lead to further marginalization of these groups.

Misunderstanding and Compromised Execution of the Process

At the convening, participants raised a general concern that the use of AdRecs may lead to information gaps that have the potential to harm the execution of the decennial census. There is a fear that the Census Bureau may place too much confidence in the AdRecs in the nonresponse follow-up process and may undercount nonresponsive households. There was concern that use of AdRecs itself may even *increase* nonresponses.

Potential public misperception around the privacy and confidentiality protections required by the Census Bureau, as well as the use of underlying AdRecs, could lead some households to be nonresponsive out of broader concerns about data confidentiality. One participant stated, “Public perception that other data sources are being used to complete the census may discourage participation and undermine confidence in the confidentiality of the census.” Some vulnerable populations may not understand that participation in the census will not place them at any risk.

Contacting Clusters of Vulnerable Populations

Vulnerable populations tend to cluster geographically within communities, and these communities historically have been hard to count in the decennial census. For instance, hard-to-count areas can include high-poverty neighborhoods whose residents can be combinations of minorities, documented and undocumented immigrants, families whose adult members are unemployed or have chronic health conditions, food-insecure families, transients and the homeless, and fixed-income people such as the elderly. Where it is possible to identify geographic locations with higher concentrations of vulnerable populations, getting the residents of such communities to receive, complete, and return a census form (or even to respond by telephone or online) can require an enormous effort.

Some of the proposed uses of AdRecs do not appear likely to affect the accuracy of the count of such populations. For instance, the Census Bureau maintains its MAF using updates from USPS DSF, the Geographic Support System partnership, and the Local Update of Census Addresses (LUCA) program. These updates focus on perfecting a list of conventional housing units that have addresses able to receive mail. This is important because the census must place every person in one location (a “usual place of residence”) and because initial outreach to announce the start of the census is through the mail. Yet some of the most vulnerable populations reside in unconventional or “low-visibility” housing that do not receive mail through a unique address—for example, two or three families living in seemingly single family homes, garages or shacks in the backyards of homes, and structures and trailers set back in a property and hidden from the street view. Participants felt that conventional AdRec methods and partnership programs, such as LUCA, do little to help identify this class of residences. That may be an opportunity lost, given that local governments may have information about living arrangements in structures or residences that have no “mailable” address.

In summary, the use of AdRecs in the 2020 Census clearly addresses the objective of a more efficient census (both in terms of effort and resources). What is still unclear is whether AdRec usage will achieve this greater efficiency by disproportionately improving the enumeration of some populations,

while systematically increasing the misrepresentation of more traditionally vulnerable subpopulations. This does not necessarily need to be the case, and the convening participants identified several opportunities for using AdRecs to improve the efficiency and accuracy of counting vulnerable populations that are at risk of disproportionate underrepresentation in the AdRec procedures planned for the 2020 Census.

Recommendations and Opportunities for Improving the 2020 Census

Representatives from the Census Bureau communicated a clear sensitivity to the cost of implementing the decennial census. There is tremendous pressure to “do more with less.” Funding to adequate levels seems to be a perpetual challenge, yet the Census Bureau staff appear undaunted in their pursuit of a high-quality census. Incorporating AdRecs into the census procedures is an important contribution to cost-reduction efforts at various points throughout the census design. However, the many different implications of this new approach, both positive and negative, are still largely unknown.

An overarching, principal theme that emerged during the convening is that the Census Bureau and the civil rights community could rely on one another—both independently and in collaboration—to improve the success of the 2020 Census. This theme transcends the use of AdRecs in the decennial census, but there are specific areas with AdRec use where assistance could be provided to enhance the positive implications of the new AdRec procedures and to mitigate the potential negative implications.

The overarching interests of civil rights stakeholders in the census are threefold. First, the Census Bureau is obliged to clearly communicate the new AdRec procedures to the civil rights community and listen to its concerns, while the civil rights community is obliged to fully understand the AdRec procedures and voice concerns if it perceives the data quality of a specific group—often members of the underrepresented and vulnerable subpopulations—is potentially compromised in the decennial census.

Second, by virtue of their involvement with vulnerable populations and familiarity with associated administrative data, stakeholders may be able to enhance the Census Bureau’s efforts by providing recommendations and assistance in securing access to relevant state datasets, resulting in more effective and comprehensive use of administrative data in the census. Finally, and perhaps most important, civil rights stakeholders have an interest in promoting the participation of hard-to-count populations in the decennial census, thereby reducing the need for imputation or other compensatory processes associated with nonparticipating populations.

Improving Communication and Understanding of AdRec Changes to the Census

For many people, the decennial census is surprisingly complex. The complexity makes the process difficult to explain and understand. Incorporating AdRecs into the process makes the census even more complicated, difficult to understand, and vulnerable to misperceptions about what is really taking place. At the scale of the US census, even nuanced details of the process can have major implications. In the absence of that understanding, unfounded concerns can take root among well-intentioned stakeholders, and important consequences may remain undiscovered by experts who could have easily pointed them out had they understood the process more clearly and completely.

To avoid the detriment of unfounded concerns and to enjoy the benefit of peer review, the Census Bureau and the civil rights community should (1) clearly convey and understand the complex and nuanced AdRec procedures, and (2) provide and accept well-informed feedback on unrecognized challenges.

Clearly Convey and Understand the Complex and Nuanced AdRec Procedures

The Census Bureau prides itself on the use of strategies, designs, and methods that meet the highest level of scientific integrity and rigor. Due to the ever-present challenges associated with funding uncertainties and pressures to cut costs, the Census Bureau has taken deliberate steps to identify and exploit efficiencies in the census design and operations that are the result of scientific testing and evidence-based decisionmaking. The Census Bureau is resolute in its pursuit of an accurate count of the population, and the enthusiasm, passion, and commitment were evident in the presentations made by the Census Bureau staff at the roundtable convening.

The Census Bureau representatives exhibited transparency in revealing the Census Bureau's AdRec methodology, the evidence it used to justify adoption, and the expected outcomes of its use in the decennial census. Senior level Census Bureau staff were very willing to engage with the scientific, academic, policy, and advocacy experts at the convening and discuss AdRec methods and their importance to the 2020 Census. They encouraged questions and feedback and showed both professionalism and passion for their work. They conveyed that the Census Bureau first conducted research to establish data quality, as well as the efficiency and effectiveness, of using AdRecs to implement, supplement, or refine a given operation or task. Then, adapted operational plans to incorporate the use of AdRecs where appropriate and evaluated the methods and operations through

on-site and field tests to further refine the efficiency of AdRec usage. Ultimately, participants found the Census Bureau’s representatives to be candid, dedicated to scientific integrity, and open to hearing concerns and suggestions to make the use of AdRecs better and the implementation of the 2020 Census scientifically more sound and efficient. However, some needlessly confusing elements in their presentations hindered the recognition of the positive things the Census Bureau is already doing (e.g., using similar titles for completely distinct concepts, overly complex infographics, lack of contextualizing anecdotal narrative, etc.). In other words, the Census Bureau may be creating problems for itself by simply undercommunicating the good things it is already doing.

The Census Bureau is not attempting to obfuscate any of its decisions or activities leading to its decision to use AdRecs, yet even the technical experts participating in the convening were sometimes confused by the explanations of AdRec plans. This lack of clarity is understandable given the complexity and nuance of the topic, but the opaqueness contributed to concerns about the potential implications of the use of AdRecs in the 2020 Census. Where there is uncertainty, people are left to assume the worst. However, when researchers and civil rights representatives found clarity around the procedures at the root of their concerns, they realized that some concerns were not as problematic as they had previously seemed. For example, the Census Bureau’s enumeration protocol requires the use of conventional methods (i.e., the way it would have been done before the use of AdRecs) to be used when the AdRec methods could not provide a sufficient level of confidence about a given household. However, this was generally unknown to the participants before the convening, with many assuming AdRec methods would wholly replace the conventional methods, rather than supplement them.

The Census Bureau should improve the clarity around its plans for using administrative records. This will mitigate concerns that exist only in the absence of accurate understanding of the process. By simply and clearly conveying its plans (which is admittedly a challenging task), the Census Bureau can prevent unfounded concerns from developing and proliferating.

WAYS THE CENSUS BUREAU CAN WORK TOWARD THESE OBJECTIVES²

- Simplify explanations of AdRec methods to be more accessible and tailored to specific stakeholder audiences.
 - » For addressing civil rights stakeholders’ concerns, it would be beneficial to focus on how AdRec usage at various points in the census process will allow substantially more efficient and effective enumeration of “easy-to-count” populations, thus leaving a higher portion of resources that can be devoted to intensive follow-up activity to identify and enumerate hard-to-count and other vulnerable populations.

- » For academic and policy research stakeholders, the focus could be on how the use of AdRecs could lead to incredibly rich (albeit restricted) datasets to promote scholarly research and unique policy solutions.
- » For policymakers, the messaging can focus on the use of AdRecs to achieve a “cheaper and better” census.
- Continue using infographics, but tailor and simplify them for specific audiences (e.g., researchers, advocates, general public, and data specialists).
- Create explanatory marketing materials that can be distributed to advocates and partners.
 - » Work with external partners to support communications efforts.
- Be transparent about confidentiality and opportunities provided by administrative data.

Provide and Accept Well-Informed Feedback on Unrecognized Challenges

The civil rights community and researchers are concerned with getting accurate counts of vulnerable populations in the 2020 Census. Many of the participants expressed a willingness to assist the Census Bureau in improving execution of the 2020 Census. They are prepared to do this as part of their mission to advance the interests of their constituencies. They are willing to leverage their unique knowledge and experience with AdRecs, as well as their grassroots constituencies, to help improve AdRec protocols and promote participation in the census.

The Census Bureau has vehicles in place for obtaining external input and advice from various communities—its advisory committees and the partnership program. The advisory committees allow the Census Bureau to get expert feedback from the scientific and stakeholder communities. The Census National Advisory Committee on Racial, Ethnic, and Other Populations advises the Census Bureau on issues related to the counting and measurement of vulnerable and hard-to-count populations. The partnership program leverages the reach of national, state, and grassroots organizations to help educate the public about the importance of the census to their respective communities and constituencies and promote participation.

These are important functions in which the civil rights community can and will participate. Yet convening participants believed that civil rights stakeholders can do more to help inform and improve census methods and operations, including how the Census Bureau uses AdRecs at various points in the census process. Thus, an overarching recommendation was to encourage the Census Bureau to be more

open to exploring the benefits of engaging the civil rights community in activities to improve the use of AdRecs in the census, as well as in other Census Bureau activities.

There are other ways that the civil rights community can help the Census Bureau with the decennial census, including how it uses administrative records in census operations. By virtue of working with administrative data related to their constituencies, civil rights and advocacy experts have insights into the quality of administrative data, how to leverage the quality of AdRec data, and potential AdRec data limitations. The Census Bureau could benefit from more effectively drawing on the collective knowledge of the civil rights community. Although representatives of some civil rights and advocacy groups already serve on Census advisory committees, the broader advocacy and civil rights communities could provide much more useful information than the few representatives who hold memberships on advisory panels.

Navigating State and Local Governments

In addition to improving its communication strategy, the Census Bureau could improve its access and interpretation of AdRec data sources by engaging community advocates and civil rights organizations that have knowledge of local governmental systems. Using the civil rights community as an advocate of AdRec data-sharing has not been a part of the Census Bureau strategy to secure such data. The Census Bureau should explore this opportunity.

Better communication will enable the civil rights community and their partners to help the Census Bureau access more administrative data at local and state levels. Through their work and missions, civil rights organizations are adept at working with and through state and local jurisdictions, community leaders, and other advocacy organizations. They have learned to navigate the system and have built networks and relationships that help promote their cause. Specifically, the Census Bureau can leverage civil rights organizations' networks to get greater access to various types of administrative data that are accessed and interpreted differently on a state-by-state basis; the civil rights community is well-positioned to assist with this effort. Because many civil rights stakeholders operate at a subnational level, they can help provide contextual information about the automatic activation of administrative data based on triggering events or help gain the much-needed support of state governments to share data with the Census Bureau. Moreover, civil rights stakeholders can also mobilize their constituencies and supporters to encourage jurisdictions to share AdRecs with the Census Bureau.

Reaching Hard-to-Count Populations and Constituencies

The Census Bureau can provide information to the civil rights community about how it will perform the census so stakeholders and advocates can provide guidance to their constituencies about the importance of being counted, strategies to ensure they are enumerated, and the established standards that protect their confidentiality and privacy when participating in the census. In particular, the census could benefit from (1) allowing local perspectives to supplement AdRec-based information during implementation, (2) facilitating community organizations' contributions to the LUCA program, and (3) encouraging civil rights constituents' participation in the census.

Local Perspectives to Supplement AdRec-Based Information during Implementation

The Census Bureau will be employing residents within the community as enumerators to help inform community members about the census and its importance. This method addresses many cultural and language barriers that may otherwise hinder the work of census workers who are assigned to an area and may not be as familiar with the local culture or languages. The Census Bureau should adequately train enumerators to ensure that the purpose and methods of the Census Bureau are properly understood and relayed to appropriate audiences. It is also important that enumerators have access to resources to answer questions, especially about privacy and security, that arise along the course of their jobs. Purposeful engagement with vulnerable or minority populations makes it even more important to ensure data protection and security.

Additionally, enumerators should know that part of their role is to help mitigate some of the potential weaknesses of the use of administrative data. Rather than simply and wholly relying on those data in a manner that could amplify any biases they may contain, enumerators should be empowered to alert the Census Bureau of instances where AdRec-based information does not match their observations. This should help alert the Census Bureau to potential systematic issues with information generated by their use of AdRecs in these settings.

Community Organization Contributions to the LUCA Program

The Local Update of Census Addresses (LUCA) is a partnership program between the Census Bureau and states, counties, cities, and other municipalities and tribal governments that provides an opportunity to review and supplement the address lists and digital maps used in the census. The LUCA

program represents a “reality check” of the updated address list in the years leading to the decennial census, offered to local jurisdictions and stipulated by law.

Almost all state and local governments are eligible to participate in the LUCA program, but *only* state and local governments are eligible. Civil rights and advocacy organizations are not directly involved with the LUCA updating process. This is a potential opportunity lost, as these groups may be able to identify pockets of hidden or otherwise unrecorded residential units and addresses that government agencies could not find. Convening participants noted that jurisdictions tend to focus their efforts on validating street addresses and removing duplicate addresses. The updating process in many jurisdictions does not consider unconventional housing units (e.g., a garage unit behind house or an obscured trailer), especially residences that have no street address. The Census Bureau recently revised the LUCA program to allow governments to submit descriptions of living quarters, along with map spots, that do not appear on the MAF. So the program is no longer limited to housing updates for units that have a street address. The accuracy of the address lists could be improved if nongovernmental organizations were allowed to assist the jurisdictions or provide their own input. The LUCA program should encourage MOU’s between participating governmental entities and knowledgeable NGO’s, to allow direct involvement by community-based organizations that are most familiar with low-visibility housing units and other situations where living quarters might not be included in the MAF.

Encouraging Constituent Participation

Convening participants also suggested the development of a crowd-sourced and open-data solution could supplement the LUCA program. Currently, the LUCA housing unit counts for all areas (different from actual address lists) are posted publicly, so anyone can assess whether the counts for a particular block appears too low or high, which could help guide a jurisdiction’s LUCA review process at a block-level. However, participants suggested there could be an address-level “open-data” analog—not involving the disclosure of Title 13 protected data—in which community groups could contribute to the development and curation of an address list. The lists could be developed in areas that local jurisdictions determine to be especially vulnerable to undercounts. This supplemental list could also include a collection of dwelling locations without conventional residential addresses (e.g., “garage behind home whose address is xyz”) or unconventional locations (e.g., “upstairs room in warehouse” or “trailer by river near bridge with geo-coordinates xyz”). The open-source data could provide an additional check on the quality of the address list as well as a list of unconventional residences that are not associated with a

“residential address” as required by LUCA. It could also provide additional information to pre-census efforts, such as the Census Bureau’s “in-office” canvassing operation.

The civil rights community represents a broad spectrum of national and local organizations with unique access to and knowledge about vulnerable, hard-to-count populations and the communities in which they reside. The Census Bureau could leverage this network in ways that transcend the objective of the partnership program to “get the word out” to the public about the value of participating in the decennial census. Specifically, there is an opportunity to create a working collaboration between the Census Bureau and the civil rights community to assist in identifying and motivating vulnerable populations to participate in the census. The collaboration could comprise members of all civil rights organizations that wish to participate, and the goal would be for members to share knowledge about their vulnerable population constituents with the Census Bureau and vice versa (i.e., for the Census Bureau to share methodological approaches, protocols, and materials with members). Collaboration activities would focus on improving the enumeration of hard-to-reach populations:

- Assist with the recruitment of Census Bureau field staff who are familiar with the vulnerable populations in their community and include such population members as candidates for hire (provided they meet qualifications) to conduct follow-up fieldwork or to advise on how to identify and encourage the participation of hard-to-count populations in their community.
- Help train local census field staff, help develop training materials, and act as a local resource for census field staff, especially as it relates to tailoring approaches to vulnerable populations that are culturally relevant and sensitive, linguistically appropriate for local non-English-speaking communities, and, above all else, nonthreatening.
- Provide the Census Bureau with access to their experts’ advice on the quality, utility, and interpretation of state or local AdRec databases that the Census Bureau would like to incorporate into its use of AdRecs.
- Identify teaming opportunities to help local jurisdictions with the LUCA program.

These recommendations should produce benefits beyond mitigating the negative and enhancing the positive effects of incorporating AdRecs into the census.

Conclusion

The use of administrative records in the 2020 Census opens the possibility of putting already vulnerable populations at a greater disadvantage. This risk is associated with any change in the design and operations of the decennial census. However, the use of AdRecs in the 2020 Census also creates important opportunities for *improving* the representation of historically underrepresented populations by creating new pathways for people to be included in the census.

This report has sought to point out the areas of concern among researchers and the civil rights community, and to identify the opportunities for mitigating the consequences and enhancing the benefits of incorporating AdRecs into the census procedures. This report is not intended to be comprehensive. The findings and recommendations contained in this report provide a starting point for exploring how collaboration between the Census Bureau and the civil rights community can improve the use of AdRecs in the decennial census, as well as Census Bureau data collection activities more broadly. This report is not intended to be comprehensive. We hope this report can inform decisionmaking around strategic partnerships between the Census Bureau and the civil rights community to create a more fair, accurate, and efficient decennial census.

Notes

1. The LUCA program was created by the Census Address List Improvement Act of 1994, P.L. 103-430
2. The Census Bureau has a robust community partnership program that underwent testing in the 2015 Census Test. The principal objective of the partnership program is to help educate the public about the census and the importance of participation. In this sense, the partnership program is a communication, educational, and motivational tool aimed at securing higher participation rates. This is a very important function and one in which the civil rights community could contribute, and it appears willing to do so.

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