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We Bring Value-Added Census Data and Education to the User

June 18, 2018

Dr. Nancy Potok
Chief Statistician
Office of Management and Budget
725 17th Street NW
Washington, DC 20503

Dear Dr. Potok—

The Office of Management and Budget has issued a request for comments concerning the Appeals Process for the 2020 Census Local Update of Census Addresses Operation. (*Federal Register*, Vol. 83, No. 98, May 21, 2018, pp. 23487-23491.)

I am writing on behalf of the National State Data Center (SDC) Steering Committee to offer our comments. The SDC network includes state government statistical agencies, research centers, and data-providing organizations from 56 states and territories. We partner with the Census Bureau to provide training, technical assistance, and extension of Census products in our states. Many of our SDC members are engaged in the 2020 LUCA program, now underway. The Steering Committee represents the interests of these organizations, and coordinates activities with the Census Bureau.

The 2020 LUCA program is a partnership between the Census Bureau, states, and local governments. All are working to ensure that the Census Bureau has an accurate and complete Master Address File (MAF) ahead of the 2020 Census. Local governments' participation is essential as they are typically the originators of new addresses. Given the voluntary nature of LUCA participation, and given the tight timeline described for LUCA, we believe processes should be streamlined to acknowledge the value being contributed by participating states and local governments, and to minimize the paperwork burden associated with participation.

At issue now, the *Federal Register* Notice proposes an appeals process, to be used in cases in which the Census Bureau does not accept new addresses or address edits submitted by a LUCA participant. OMB proposes: "When filing an appeal, eligible participants must include supporting documentation that substantiates the existence and location of each appealed address." Further, the Notice stipulates that "Appeal decisions will be based solely on a review of written documentation provided to the appeals staff by the eligible government and the Census Bureau." We expect this proposed process places a disproportionate burden of proof

on participating states and local governments, and will impose unreasonable costs, significantly beyond what was anticipated at the time states and local governments registered to participate in LUCA. We further expect these factors, if they become the rule, will discourage states and local governments from pursuing appeals.

Based on experiences with LUCA in 2008-09, we expect millions of new addresses and address edits will be refused by the Census Bureau. This should not happen capriciously. If states or local governments need to appeal, the process of providing additional information should be streamlined to minimize burdens and promote expeditious review by federal staff involved. We suggest: The appealing states or local governments should be permitted to group addresses in dispute into datasets that have common data sources and methodologies of identification. That should be sufficient as explanation for an appeal, and should minimize the paperwork burden for states and local governments making a good faith effort at ensuring that their residents receive 2020 Census mailings. Importantly, this suggestion does not preclude the possibility of individual addresses within a grouping being accepted or refused in the appeals process.

Thank you for your attention to our comments. The SDC Steering Committee recognizes the importance of the LUCA operation in facilitating the best possible address list for the Decennial Census.

Our network members are here to support the Census Bureau's work. Our steering committee can be reached by email: todd.graham@metc.state.mn.us, or by US mail: Todd Graham, Metropolitan Council, 390 North Robert Street, St. Paul, MN 55101.

Sincerely,

Todd Graham
Chairman, Census SDC Steering Committee

cc: Allen Barnes, Arizona State Data Center
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