October 23, 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.¹ 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, 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 a 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 maryjo@popassoc.org.
Sincerely,

The Leadership Conference on Civil and Human Rights
The Census Project
AAFF South Florida Region
Academic Pediatric Association
ACCESS
Advancement Project California
Advocates for Children of New Jersey
African American Health Alliance
African Career, Education & Resource Inc.
Alameda County Complete Count Committee
Alaska Census Working Group
Alianza Nacional de Campesinas
Alliance of Rhode Island Southeast Asians for Education (ARISE)
Allston Brighton Health Collaborative
American Academy of Pediatrics
American Anthropological Association
American Association of People with Disabilities
American Association of University Women (AAUW)
American Civil Liberties Union
American Federation of Labor-Congress of Industrial Organizations (AFL-CIO)
American Federation of State, County and Municipal Employees (AFSCME)
American Federation of Teachers
American Indian Center
American Library Association
American Pediatric Society
American Sociological Association
American Statistical Association
American-Arab Anti-Discrimination Committee (ADC)
Americans for Democratic Action (ADA)
Americans for Indian Opportunity
Andrew Goodman Foundation
APANO
APIA Vote- MI
APIC South Puget Sound
Arab American Institute (AAI)
Arizona Dream Act Coalition
Arizona Grantmakers Forum
Art+Action
Asian Coalition of Tallahassee, Inc.
Asian & Pacific Islander American Health Forum
Asian American Federation
Asian American Federation of Florida
Asian American Legal Defense and Education Fund (AALDEF)
Asian American Organizing Project
Asian Americans Advancing Justice - AAJC
Asian Americans Advancing Justice - Atlanta
Community Economic Development Center
Community Foundation Boulder County
Community Foundations of the Hudson Valley
Community Service Agency- Child and Family Services
Complete Count Committee--City of Magnolia, AR.
Congregation of Our Lady of Charity of the Good Shepherd, U.S. Provinces
Connecticut Community Foundation
Connecticut Council for Philanthropy
Consejo Hispano - Oregon
COOLJC Region Social Justice Economic & Racial Equality Commission
Cooper Foundation
Corvallis Multicultural Literacy Center
Council of Professional Associations on Federal Statistics (COPAFS)
Crescent City Media Group/Center for Civic Action
D. C. Hunger Solutions
Destiny Community Development
DOC Project
Dreams United/Sueños Unidos
Dukes County Complete Count Committee
Electronic Privacy Information Center
Engage Texas
Empowering Pacific Islander Communities (EPIC)
End Citizens United / Let America Vote Action Fund
Equal Rights Advocates
Equality California
Equality North Carolina
Fair Count Inc
Faith and Works Statewide Civic Engagement Collective
Faith in Action
Federation of Pediatric Organizations
Feminist Majority Foundation
First African Community Development Corporation
First Alaskans Institute
First Peoples Fund
Florida Asian Services
Florida Asian Women Alliance
Florida Chinese Federation
Florida Civic Engagement Table
Florida Immigrant Coalition
Florida Philanthropic Network
Food Research & Action Center
Forefront
Funders Together to End Homelessness
Futuro RGV, Inc.
Girls Inc.
Government Information Watch
Grantmakers Concerned with Immigrants and Refugees (GCIR)
Grantmakers of Oregon and SW Washington
Literacy Connects
MACS 2020 - Minnesotans for the ACS and 2020 Census
Madison Community Foundation
Main Street Project
Maine Association of Nonprofits
Maine Children's Alliance
Maine Philanthropy Center
Massachusetts Immigrant and Refugee Advocacy Coalition
Mat-Su Health Foundation
Matthew Shepard Foundation
Metro Lansing Poor People's Campaign
Miami Gardens Observer Inc
Michigan APALA
Michigan Nonprofit Association
Minnesota Council on Foundations
Minnesota State Demographic Center
Missouri Asian American Youth Foundation
Montana Nonprofit Association
Multnomah County
NAACP
NAACP Washington Bureau
NAACP New Bedford Branch
NALEO Educational Fund
NANAY Inc (National Alliance to Nurture the Aged and Youth)
Nantucket Planning & Economic Development Commission
National Advocacy Center of the Sisters of the Good Shepherd
National Alliance for Partnerships in Equity (NAPE)
National Association for Bilingual Education
National Association for Business Economics
National Association for the Education of Young Children (NAEYC)
National Association of Councils on Developmental Disabilities
National Association of Jewish Legislators
National Association of Regional Councils
National Association of Social Workers
National Center for Law and Economic Justice
National Center for Learning Disabilities
National Center for Lesbian Rights
National Center for Transgender Equality
National Community Development Association
National Council of Asian Pacific Americans (NCAPA)
National Council of Churches
National Council of Jewish Women
National Council of Nonprofits
National Disability Rights Network (NDRN)
National Down Syndrome Congress
National Employment Law Project
National Equality Action Team (NEAT)
National Health Law Program
National League of Cities
National LGBTQ Task Force Action Fund
National Low Income Housing Coalition
National Organization for Women
National Partnership for Women & Families
National WIC Association
National Women's Law Center
Native American Rights Fund
Native Ways Federation
NAVA Education Project and NM Native Census Coalition
NC Counts Coalition
NEA
Nebraska Civic Engagement Table
NETWORK Lobby for Catholic Social Justice
New Bedford Complete Count Committee
New Bedford Democratic City Committee
New Bedford Free Public Library
New Jersey Institute for Social Justice
New Mexico Voices for Children
Nielsen
Nonprofit Association of the Midlands
North Star Civic Foundation
Northern California Indian Development Council, Inc.
Northwest Health Foundation
NY Counts 2020
NY Funders Alliance
OCA - Asian Pacific American Advocates
OCA - Asian Pacific American Advocates of Pittsburgh
OCA - South Florida Chapter
Ohio Women’s Alliance
Oklahoma Policy Institute
One Arizona
OPAWL - Building AAPI Feminist Leadership in Ohio
Open Signal Community Media
Oregon Community Foundation
OutNebraska
PACE, Inc.
Pacific Islander Health Board of WA
Pakistani American Voter Registration Initiative
Partners for a Hunger-Free Oregon
Paterson Alliance
Pediatric Policy Council
Pennsylvania Partnerships for Children
People For the American Way
PFLAG National
Philanthropy California
Philanthropy New York
Philanthropy Northwest
Phoenix Indian Center
PICO California
Pillsbury United Communities
Pima Community College
Pima County Government
PolicyLink
Poligon Education Fund
Population Association of America
Power Coalition for Equity and Justice
Power of Families Program/CSC
Prison Policy Initiative
Public Justice Center
RCMA
Renton Technical College
Research Advisory Services, Inc.
Resilient Democracy
RESULTS
RESULTS DC
Rhode Island KIDS COUNT
Sagacious Works
Sant La Haitian Neighborhood Center,
SEIU Local 503
Service Employees International Union (SEIU)
Services, Immigrant Rights and Education Network (SIREN)
SHK Global Health
Silicon Valley Community Foundation
Silver State Equality-Nevada
Silver State Voices
Social Eco Education (SEE-LA)
Society for Pediatric Research
South Asian Bar Association of Austin
South Asian Network
South Park Senior Center
Southeast Asia Resource Action Center (SEARAC)
Spean Rajana
Street Roots
TASH
Texas Progressive Action Network
Thai Community Development Center
The Bingham Program
The Center at Sierra Health Foundation
The Coalition for Social Justice
The Council of Michigan Foundations
The Fairview and Wood Village Census Access Center
The Funders Network
The Horner Foundation
The Libra Foundation
The Miami Foundation
The National Urban Indian Family Coalition
The New York Immigration Coalition
The Sikh Coalition
Together SC
Together We Count
Town of Holly Hill SC Complete Census Count Committee
Tucson Unified School District
Tufts Health Plan Foundation
U.T.O.P.I.A. Seattle
UnidosUS
Union for Reform Judaism
United Philanthropy Forum
United States Conference of Mayors
United Way Association of SC
United Way Bay Area
United Way of Chester County
United Way of Greater New Bedford
United Way of the Columbia-Willamette
United Ways of Iowa
United We Dream
Urban and Regional Information Systems Association
Venice Family Clinic
VietLead
Voices for Racial Justice
Vote New Bedford
Wallace H Coulter Foundation
Washington Census Alliance
We All Rise
We Count Oregon
West Central Initiative
Whatcom Community Foundation
Wildfire: Igniting Community Action to End Poverty in Arizona
Women Alliance of Miami Dade & Broward, Inc.
Wyoming Community Foundation
YMCA of Greater New York
Youth Opportunities Unlimited, Inc.
YWCA Southeastern Massachusetts
ZERO TO THREE

1 13 U.S.C. §141(b) & (c).
2 Issued April 13, 2020.