



November 15, 2022

SENT VIA ELECTRONIC MAIL

Director Robert L. Santos
United States Census Bureau
U.S. Department of Commerce
Washington, D.C. 20233

Re: Comments on 2030 Census Preliminary Planning
Response to Federal Register Notice, Docket No. USBC-2022-0004

Dear Director Santos:

We appreciate your early effort to receive input from states, other stakeholders, and members of the public in the preliminary stages of planning for the 2030 Census. As you know, California started preparation early for the 2020 Census, and we invested \$187 million over four years for Census outreach and education. We strongly believe that those investments assisted in reducing projected undercounts in our state, and we were heartened to learn recently that you share that view.

In California, we see Census outreach and education as a shared responsibility and look forward to continuing our dialogue with you over the decade ahead. We are also pleased to share our recommendations for your 2030 Census planning work. We have developed these recommendations based on our experiences during the 2020 Census cycle:

Public Input

- We strongly urge the early formation of a 2030 Census Planning Advisory Board to allow key stakeholders, including state representatives, to provide input for the 2030 Census. This would reduce miscommunications, minimize duplication of efforts, and allow the Census to gain the benefit from stakeholders of valuable insights and experience.
- We suggest that planning for the 2030 Census should include (particularly on the Advisory Board) key experts familiar with the state and local redistricting process. Input from these experts is especially important when changes to the data provided or the format used are discussed. Reapportionment and redistricting are the original reasons for collection of the Census data. Including redistricting experts on the Advisory Board is essential to ensure that the needs of its users are understood, and that the redistricting community is informed about Bureau plans and has a timely avenue to weigh in.

Technology and Data

- A public review of the Bureau's approach to protecting confidential data should be conducted. Differential Privacy, the method currently in use, has resulted in a greater weight being given to disclosure avoidance than to accuracy. This has disproportionately impacted redistricting. Specifically, data for small population groups, racial and ethnic minorities and incarcerated populations have been reported inaccurately by design using this method. We urge the Bureau to reassess its reliance on Differential Privacy and conduct a thorough review to determine whether alternative disclosure avoidance methods would result in more accurate data. Legal experts should be included to review the Bureau's interpretation of Title 13 to assess whether the law in fact requires the use of such dramatic disclosure avoidance technology.
- Reallocated inmate data for redistricting should be provided to states which request it. California's independent redistricting commission voted unanimously to respond to the Federal Register Notice and request that data be provided that counts incarcerated people at their last-known residence instead of the address where they are incarcerated.
- The Bureau has utilized various administrative data sources to supplement the decennial count of the population. However, there is little information available about the quality of the administrative data. If there are plans to increase reliance on administrative data for 2030, it is essential that the Bureau invite input on the data sources. Many administrative datasets exclude certain hard-to-count populations, and we urge the Bureau not to rely on these data as a substitute for a solid outreach program that will reach those populations.

Outreach

- Early and detailed information should be provided to local government partners, as well as follow-up to ensure the materials are being acted on. The Bureau should increase resources directed at reaching appropriate designees in local governments to maximize participation. Local participation will continue to lag if the Bureau is unable to reach key-stakeholders that must facilitate participation.
- The Bureau should investigate which outreach methods, those used by the Bureau or those conducted by states, were most successful. How will the Bureau ensure appropriate outreach if states are not able to fund additional outreach in 2030?
- Online response options should be offered in all languages in which 2030 Census guides are available.
- Small communities in California have noted that the data collection assistance they provided did not result in the populations they know are present on the ground being reflected in the data. Participation is hampered by disclosure avoidance methods that return inaccurate data on small units of analysis. Accurate data reporting is essential to maintain and increase participation.
- Early efforts should be made to get the word to parents about the need to have children counted. This should include through schools, pediatricians, maternity wards, WIC providers, etc.

Thank you again for seeking our input in your planning efforts. We look forward to working with you in the years ahead.

Respectfully,



Toni G. Atkins
Senate President pro Tempore



Anthony Rendon
Speaker of the Assembly