

July 19, 2022

The Honorable Robert Santos
Director
U.S. Census Bureau
Washington, DC 20233

Dear Director Santos,

Census Equity Initiative, a philanthropic collaborative of hundreds of funders supporting nonprofits across the country, spearheaded a nationwide campaign to ensure a fair and accurate 2020 Census, particularly in historically undercounted communities, and continues its work looking towards the 2030 Census. The Funders' Committee for Civic Participation, a network of democracy funders that operates the Funders Census Initiative, is an active part of the collaborative in engaging funders on census issues.

One of our top priorities now is to ensure that census-derived data are high-quality and properly reflect the composition and distribution of the nation's population. The prudent allocation of public, private, and nonprofit resources is essential, particularly for individuals and communities that have been historically undercounted, under-represented, and systemically marginalized in our democracy, including people of color, immigrants, low-income and limited English proficient households, LGBTQ people, people with disabilities, and young children.

To that end, we support a robust Population Estimates improvement process to right-size the flow of federal funds to communities undercounted in the 2020 Census. We believe this can be accomplished with additional sources of high-quality state and local administrative data that will reduce undercounts now and in the future.

We are encouraged by your research initiative to improve the accuracy of the annual Population Estimates, especially to mitigate the consequences of differential coverage in the 2020 Census, and by your commitment to a new appeals program starting with the 2022 estimates.

The Post-Enumeration Survey revealed the persistence of differential undercounts in the 2020 Census, a disappointing although perhaps not surprising outcome in light of the many operational challenges the Census Bureau faced. Simply put, despite the bureau's best efforts, the outcome of the 2020 Census was not equitable.

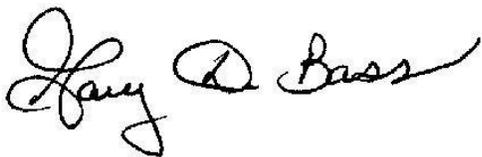
Unfortunately, existing avenues to challenge and correct census undercounts are narrow in scope and, unless expanded, will do little to restore accuracy to census-derived population data used to distribute vital resources. We believe the Census Bureau can rebuild public confidence in its data and set a better course toward a 2030 Census without a differential undercount, by establishing an expanded Population Estimates appeals process when the program resumes next year and strengthening its partnerships with states to produce credible estimates throughout the decade.

There is precedent for an expanded Population Estimates program. In the 1970s and 1980s, the bureau partnered with states to produce annual estimates and used a broad range of data inputs to produce them. Although the Population Estimates challenge process became more adversarial in later decades, the bureau accepted a broader range of evidence from localities to improve the accuracy of its estimates until the decade following the 2010 Census.

The House Appropriations Committee, in a report tied to the Census Bureau's FY 2023 funding bill, expressed its interest in a broader Population Estimates appeals program to ensure the accuracy of this vital data set. Therefore, we encourage the bureau's new Base Evaluation and Research Team to consider, as evidence of higher housing unit and associated population counts, data available from states and localities that are known to better capture historically undercounted groups.¹ We also urge the bureau to work with stakeholders to continually improve methodologies to ensure the most accurate estimates possible using these expanded sources of data.

Philanthropy appreciates its ongoing partnership with the Census Bureau, and we thank you for your consideration of our views on this important topic.

Sincerely,

A handwritten signature in black ink that reads "Gary D. Bass". The signature is written in a cursive, flowing style.

Gary D. Bass
Consultant & Executive Director Emeritus, Bauman Foundation
Chair, Census Equity Initiative

¹GAO, [2020 Census, Local Administrative Records and Their Use in the Challenge Program and Decennial](#). Feb 2013.



LaShanda A. Jackson, MBA
Executive Director, Funders' Committee for Civic Participation



Sol Marie Alfonso-Jones
Senior Program Officer, Long Island Community Foundation
Chair, Funders Census Initiative, FCCP