

**FUNDERS' COMMITTEE  
FOR CIVIC PARTICIPATION**  
PEOPLE | PHILANTHROPY | POWER

December 21, 2022

Shannon Wink  
Program Analyst, Policy Coordination Office  
U.S. Census Bureau  
U.S. Department of Commerce  
Washington, DC 20230

RE: November 22, 2022 *Federal Register* Notice of proposed rulemaking and request for comments on the Population Estimates Challenge Program, RIN number 0607-AA60

Dear Ms. Wink,

Thank you for the opportunity to comment on proposed revisions to the Population Estimates Challenge Program and improvements to the Population Estimates Program in general, in order to ensure the most accurate data for the nation's localities throughout the decade.

The Census Equity Initiative (CEI) is a philanthropic collaborative of hundreds of funders that came together to spearhead 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 grantmakers that participate in CEI, large and small, come from across the country, giving hundreds of millions of dollars each year to advance the common good and improve the quality of life in the United States. These foundations have different funding priorities, are ideologically diverse, and do not always agree with each other. But we share a common interest in a fair and accurate census, eliminating the persistent, disproportionate undercount of certain population groups, and providing access to demographic data, particularly data that can address equity issues. CEI is steered by a committee of some of the nation's most prominent national and regional foundations: Annie E. Casey Foundation, Bauman Foundation, Carnegie Corporation of New York, Ford Foundation, Heising-Simons Foundation, Joyce Foundation, The JPB Foundation, Open Society Foundations, Robert Wood Johnson Foundation, Rockefeller Brothers Fund, Unbound Philanthropy, Wallace H. Coulter Foundation, and W.K. Kellogg Foundation. (Note: These comments are being submitted on behalf of the CEI as a whole and not on behalf of any of the individual members noted here).

The Funders' Committee for Civic Participation (FCCP), an active part of the philanthropic collaborative, is a network of grantmakers who share an underlying conviction that all people deserve a voice in our democratic process. We work to dismantle unjust systems and structures, and shift power to

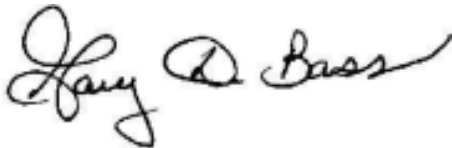
communities that have long fought for inclusion. FCCP's commitment to racial justice and to achieving a democracy where all communities are counted, resourced, and represented necessitates our deep engagement on the American Community Survey (ACS) and census. Through outreach, education, and mobilization, FCCP's Funders' Census Initiative (FCI) engages philanthropy, with a particular focus on state and local funders, to leverage their resources and power in support of a fair and accurate count.

Earlier this year, in two letters to Census Director Robert L. Santos, CEI and FCCP set forth our concerns about the scope of the Challenge Program and suggested important areas of consideration to strengthen the annual estimates. We respectfully submit that correspondence (along with the Director's responses for context) in response to this *Federal Register* Notice as an appropriate representation of philanthropy's recommendations to improve the Population Estimates going forward.

The Census Bureau's annual Population Estimates are used to guide the allocation of trillions of federal dollars to states and localities, families, and individuals throughout the decade. Because the latest census numbers are the base for the estimates, the inequitable 2020 Census results — which reflect significant undercounts of Black, Hispanic, and Native American communities, as well as renters and children — will be baked into the data used to distribute federal resources unless cities, counties, and other localities have an effective path to challenge and improve the accuracy of the estimates. The current appeals process is unnecessarily narrow and does not offer a meaningful way to mitigate the harm caused by census undercounts. Rural and urban communities, localities hit by natural disasters around the time of the census, and localities that are home to historically undercounted population groups will all benefit from a better appeals program and a more collaborative population estimates program overall.

Please direct any questions about our recommendations to Karen Narasaki, Consultant, CEI at [karen@narasakijustice.com](mailto:karen@narasakijustice.com) and Jocelyn Bissonnette, Director of Special Projects, FCCP at [jbissonnette@funderscommittee.org](mailto:jbissonnette@funderscommittee.org). Thank you for considering our views.

Sincerely,



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



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