New York State Advisory Committee
to the U.S. Commission on
Civil Rights

This summary report of the New York State Advisory Committee to the U.S. Commission on Civil Rights was prepared for the information and consideration of the Commission:

Statements and viewpoints in the report should not be attributed to the Commission or to the Advisory Committee, but only to individual participants in the community where the information was gathered.
THE UNITED STATES COMMISSION ON CIVIL RIGHTS

The United States Commission on Civil Rights, first created by the Civil Rights Act of 1957 and reestablished by the Civil Rights Commission Act of 1983, is an independent, bipartisan agency of the Federal Government. By the terms of the Act, as amended, the Commission is charged with the following duties pertaining to discrimination or denials of equal protection based on race, color, religion, sex, age, handicap, or national origin, or in the administration of justice: the investigation of discriminatory denials of the right to vote; the study of legal developments with respect to discrimination or denials of equal protection; the appraisal of the laws and policies of the United States with respect to discrimination or denials of equal protection; the maintenance of a national clearinghouse for information respecting discrimination or denials of equal protection; and the investigation of patterns or practices of fraud or discrimination in the conduct of Federal elections. The Commission is also required to submit reports to the President and the Congress at such times as the Commission, the Congress, or the President shall deem desirable.

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An Advisory Committee to the United States Commission on Civil Rights has been established in each of the 50 States and the District of Columbia pursuant to section 105(c) of the Civil Rights Act of 1957 and section 6(c) of the Civil Rights Commission Act of 1983. The Advisory Committees are made up of responsible persons who serve without compensation. Their functions under their mandate from the Commission are to: advise the Commission of all relevant information concerning their respective States on matters within the jurisdiction of the Commission; advise the Commission on matters of mutual concern in the preparation of reports of the Commission to the President and the Congress; receive reports, suggestions, and recommendations from individuals, public and private organizations, and public officials upon matters pertinent to inquiries conducted by the State Advisory Committee; initiate and forward advice and recommendations to the Commission upon matters in which the Commission shall request the assistance of the State Advisory Committee; and attend, as observers, any open hearing or conference which the Commission may hold within the State.
Census
Undercounts
and Preparations
for the
1990 Census

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Civil Rights

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DATE: November 29, 1988

FROM: New York State Advisory Committee

RE: Census Undercounts and Preparations for the 1990 Census

TO: William B. Allen, Chairman
     Sherwin T.S. Chan
     Murray Friedman, Vice Chairman
     Robert A. Destro
     Mary Frances Berry
     Francis S. Guess
     Esther Gonzalez-Arroyo Buckley
     Blandina Cardenas Ramirez
     Melvin L. Jenkins, Acting Staff Director

Attached is a summary report of a forum held by the New York State Advisory Committee on November 19, 1987. New York State and some 50 other jurisdictions had sued the Census Bureau after the 1980 Census; many argued that undercounts adversely affected their voting representation and funding allocated to State or local jurisdictions. The Bureau itself agrees that decennial census undercounts differ by groups and that minority groups tend to be undercounted more than do nonminority groups. Recent congressional proposals call for the Bureau to correct census results to compensate for any undercount.

With preparations for the 1990 Census moving apace, our Committee invited Bureau representatives and others familiar with the issues to discuss how the 1990 count might be improved and to weigh the question of the feasibility and desirability of adjusting the count. Forum participants included elected or appointed officials of New York State and City governments, the volunteer chairperson of a minority advisory committee to the Bureau, and a scholar-researcher who has carried out independent demographic studies. Since these participants were also members of white, black, Hispanic, and Asian communities, the Committee gained from hearing from proponents of adjustment who come from a range of backgrounds. (Some participants cited the work of a high Bureau official who advocated adjustment, and her view is incorporated in footnotes and in appendix C.) At the same time, the Bureau's extensive comments on the forum reflect many current arguments opposed to adjustment. (See appendix A.)

By a 5-0 vote of its six members on April 28, 1988, the Committee approved this summary report and hopes it will prove of interest to those concerned about a major data base to be used to determine voting representation and resource allocations well into the end of this century. We will continue to monitor the topic and will share information on any significant new developments.

Walter Y. Oi, Chairman*
Setsuko M. Nishi, Vice-Chair
Paula M. Ciprich*
Richard H. Cox*

Edwin R. Espaillat
William Gangi*
Benjamin F. McLaurin
John A. Murley*

James I. Nixon
W. Rivera-Alvarado*
A. Stevens-Arroyo

*Appointed in September 1988, after the forum.
Acknowledgements

The New York State Advisory Committee wishes to thank the staff of the Commission's Eastern Regional Division for its help in the preparation of this summary report. The forum and report were the principal assignment of Tino Calabia with support from Linda Raufu and Tina James Martin. The project was carried out under the overall supervision of John I. Binkley, Director of the Commission's Eastern Regional Division.
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Commission's Prior Interest in Decennial Census

The U.S. Commission on Civil Rights previously has studied aspects of the decennial census undertaken by the Bureau of the Census of the U.S. Department of Commerce. In April 1974, the Commissioners submitted to the President and to the Congress a 112-page report, Counting the Forgotten, evaluating the efforts of the Bureau to enumerate the Hispanic population in the U.S. in the 1970 Census. Just before the 1980 Census, two of the Commission's State Advisory Committees, the Pennsylvania and West Virginia Advisory Committees, were invited to address the Subcommittee on Census and Population of the U.S. House of Representatives regarding problems inherent in counting small populations, such as Native Americans, and in counting rural minorities. The Committees' presentations appear in Oversight Hearings on the 1980 Census: Part XVII--Philadelphia, Pennsylvania, a transcript of the February 11, 1980, hearings.

Later in 1980, a suit was filed by the State and City of New York against the Bureau, based on complaints of a census undercount in the State, which remained in litigation even after preparations for the 1990 Census had begun. More recently, members of the New York State Advisory Committee decided to hold a forum on census issues, and on November 19, 1987, the Advisory Committee convened in the Javits Federal Building in New York City to hear guests knowledgeable about census matters, particularly about questions regarding undercounts of minorities in decennial censuses. This summary report is based on the forum's transcript, but it has also been expanded, clarified, and updated through footnotes citing documents gathered before, and subsequent to, the forum.

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3Cuomo v. Baldridge, 674 F. Supp. 1089 (S.D. N.Y. 1987), provides a synopsis including the court's December 8, 1987, findings.
4The official transcript is on file at the Eastern Regional Division office in Washington, D.C. Other pertinent documents are cited throughout this summary report.
Questions Posed to Census Bureau

Dr. Setsuko M. Nishi, Vice Chairperson of the Advisory Committee, prefaced the guest presentations by first noting that the Bureau had been invited to be represented at the forum and that Associate Director Ronald H. Moore of the Bureau's headquarters had been scheduled to begin the discussion. However, a week prior to the forum, Mr. Moore called to explain that the meeting then seemed untimely, for the questions which the Advisory Committee wished to raise cut across several Bureau divisions, making it hard for him to coordinate Bureau responses by the date of the forum.

The questions which were provided in the invitation to Mr. Moore dealt with preparations for the 1990 Census, including the latest version of the questionnaire to be tested during the spring 1988 dress rehearsal and the number of temporary workers expected to be hired to help carry out the census. Another set of questions had to do with the Bureau's position on adjustment of the decennial census figures reported to the U.S. Congress.5

Although the Bureau could not be present, Dr. Nishi stated that she expected eventual cooperation from the Bureau inasmuch as all Federal agencies are required by statute to cooperate fully with the U.S. Commission on Civil Rights, and the Bureau recently did so by reviewing the first draft of this summary report and then commenting at length.6 (See appendix A.) Dr. Nishi also reported that during their November 13, 1987, meeting, the Commissioners of the U.S. Commission on Civil Rights called for staff to study The Decennial Census Improvement Act of 1987, H.R. 3511 (see appendix B), and to offer a recommendation as to whether the Commissioners should endorse such legislation.


6Invited in May 1988 to comment on the first draft of this summary report of the forum, Mr. Moore sent an 11-page response and 17 enclosures now on file in the Eastern Regional Division office.
1980 Undercount in City of New York

Peter L. Zimroth, Corporation Counsel for the City of New York, opened the discussion, observing that: "I cannot imagine anything more important that the Civil Rights Commission could be doing than what you are doing today, because the issue of the undercount is central to the workings of our democracy. It is obvious that, if you are not properly counted, then you are not properly represented." Noting that he was citing the Bureau's statistics, Mr. Zimroth stated that the 1980 Census was affected by a 1.5 percent undercount for the U.S. population as a whole and that in the central cities blacks were undercounted by 11.3 percent and Hispanics were undercounted by 10.3 percent.7

He then pointed out that: "The City of New York was undercounted by roughly 500,000 people, which is more people than in many large cities in this country. It's obvious that that kind of systematic undercount disenfranchises those people in this country who are already the most disadvantaged." At another point, Mr. Zimroth explained that voting representation was not the only resultant problem. Funds from some tax-supported programs are allocated to State or local jurisdictions on the basis of population counts, and so undercounted jurisdictions, such as the City of New York, also lose in this important way as well.

Lawsuit Educated Both City and Bureau

At any rate, in 1980, the City of New York sued the Bureau,8 said Mr. Zimroth, "because of the 1980 undercount, and asked the court to order an adjustment to take this undercount into account.

7A summary of the Bureau's estimates for the undercount in prior decennial censuses appears in "Comparison of Adjustment Methods for Census Undercount in Small Areas" by Diffendal, Schultz, Huang, and Isaki of the Bureau. Estimates at the U.S. level were 2.8 percent for 1970; 3.3 percent for 1960; and 4.4 percent for 1950.
8Carey v. Klutznick, 674 F. Supp. 1089 (S.D.N.Y. 1987.) In all, some 50 lawsuits were filed against the Bureau calling for the Bureau to adjust the 1980 Census count, although none was successful. See Martha Farnsworth Riche, Senior Editor, "The Consensus Census," American Demographics, Jan. 1987, Vol. 9, No. 1, p. 8.
There was a trial in that case, and we won. Unfortunately, that decision was reversed on an evidentiary ruling, not on the merits, and the case was sent back for a new trial. And we had a new trial, [but] there has been no decision in that case."  

Throughout the course of the litigation, both the City of New York and the Bureau learned a great deal, Mr. Zimroth asserted, adding that "not only did [the case] educate us, but I think it also educated the [Bureau's] experts . . . to take a much harder look at this whole issues of adjustment . . . [and] there has been a very dramatic change." Mr. Zimroth said that the expert witnesses who testified against the City of New York's position "have now come to the conclusion that adjustment is feasible, practical, and it should be done." He referred to Barbara A. Bailar, the former Associate Director of the Bureau, who had recently been elected president of the American Statistical Association. He then read to the Advisory Committee an excerpt from Dr. Bailar's August 18, 1987, inaugural address to the association in which she stated:

[T]he consensus of the statisticians (statisticians from government, industry, and academe; statisticians who have carefully reviewed all the work in this area) is that an adjustment will provide more accurate data on the size, location, and demography of the minority populations in


this country. It's time to get on with the job!  

Mr. Zimroth also circulated to the Advisory Committee copies of a 10-page paper entitled, "The Technical Feasibility of Correcting the 1990 Census," authored by five Bureau staff persons who, Mr. Zimroth said, arrived at essentially the same conclusion reached by Dr. Bailar. Nevertheless, Mr. Zimroth reminded the Advisory Committee members that, in the two weeks prior to their meeting, a Department of Commerce decision was announced that no adjustment by the Bureau would be made of the 1990 Census figures. He noted that the press release announcing the decision declared that the Bureau expects the upcoming census to be the most accurate ever, yielding only a 1 percent undercount. Mr. Zimroth remarked that such accuracy would still amount to missing "roughly 2.4 million people."

To prevent problems that may stem from that decision, Mr. Zimroth called for publicizing the potential undercount and arguing that a solution is needed as a matter of principle. He emphasized his conviction that an undercount of 500,000 residents "has a very substantial impact on the amount of money that the City gets."

11Dr. Bailar's address appears in "Statistical Practice and Research: the Essential Interactions," Journal of the American Statistical Association (hereafter cited as "ASA Presidential Address"), Mar. 1988, Vol. 83, p. 5. During its April 28, 1988, meeting, the Advisory Committee voted to invite Dr. Bailar to comment on the summary report of the forum, and her response concerning the completeness of and facts in the report is attached as appendix C.

12The five authors are Dan Childers, Gregg Diffendal, Howard Hogan, Nathaniel Schenker, and Kirk Wolter of the Statistical Research Division of the Bureau who note that their paper reflects only their views, not those of the Bureau. The paper was presented during the August 17-20, 1987, Annual Meeting of the American Statistical Association in San Francisco. Division Chief Wolter "believes the agency 'could arrive at a single set of figures finally that would be better and more accurate than the original enumeration,' providing accurate numbers for units as small as 300 to 500 households and in some cases possibly smaller," reports Spencer Rich, Staff Writer, "Political Power and Money at Stake in Census Undercount Fight," Washington Post, Jan. 12, 1988, p. A-19 (hereafter cited as "Political Power and Money . . .").

13"The net undercount for New York City was 7.4 percent. And according to the best estimates our office has made, the amount of money that New York City has lost as a result of the 1980
And if blacks in the inner cities are not properly counted, that has a tremendous effect on basically their political power—not only in Congress, but in the State legislature, in the city council, everywhere." He also cautioned against concluding that the issue may be one of "cities versus rural or black versus white. It's simply a question of one person, one vote. If you are a person in this country, you should be counted."

The Census--A Constitutional Requirement

Jeff M. Wice, Director of the Washington Office of the New York State Assembly, explained that he gained experience in census matters starting in 1978 when he first visited the Bureau as he prepared to aid the State legislature in redrawing congressional and State legislative district boundaries after the 1980 Census. Fully agreeing with Mr. Zimroth, Mr. Wice added that the decennial census is required by Article 1, Section 2 of the U.S. Constitution to provide figures for reapportionment. He also pointed out that what is often referred to as an "adjustment" of the census figures to compensate for the undercount might best be called a "correction" because "we are really talking about correcting a wrong situation."

In 1980, the Bureau employed 275,000 field staff throughout the U.S., plus 6,300 processors who took the data from the census questionnaires to compile the results, explained Mr. Wice. The basic information came from people who returned the Bureau's questionnaires, which had been mailed on April 1, 1980, or from people who did not return the questionnaires but were subsequently interviewed in their homes by the Bureau's field enumerators. Thus, "there are a lot of people involved in the process, but

undercount is between $26,000,000 and $52,000,000 annually," wrote Charles N. Weinstock, Assistant Corporation Counsel, Law Department, City of New York, in his Nov. 20, 1987, letter to Tino Calabia, Eastern Regional Division, U.S. Commission on Civil Rights.

there are lots of errors, nonetheless."

Examples of Problems, Undercounts and Overcounts

Examples of problems, according to Mr. Wice, include the Bureau's use of commercial address lists, which can be uneven in quality, for mailing out the census forms; broken mailboxes or a group mailbox used by several recipients as is common in New York City; mail theft; English language forms received by residents not literate in English; loss of forms by recipients accustomed to throwing away "government" mail; and lack of response or neglect in filling out forms by recipients. In such cases, the Bureau assigns enumerators temporarily hired to canvass neighborhoods where there are households known to have failed to return forms.

Mr. Wice cautioned, however, that enumerators may be fearful of actually entering some buildings or households. Enumerators may then engage in what Mr. Wice called "curb stoning," that is, in making their own estimates or guesses as to how many residents a building or house appears to have. "[S]omebody will look at a building from the outside and say that one is vacant. There are no windows; it is all gutted out--when, in fact, there would be a number of homeless people inside," hypothesized Mr. Wice.

Problems of overcounts exist as well, Mr. Wice said. He mentioned the case of a businessman who received census forms at home, at his vacation address, and at a business address. After the man duly returned each form, he began to wonder when the Bureau would stop sending him another form. Mr. Wice added that he could have been counted twice, since he lives in Washington but maintains a home in New York also. When Mr. Wice's mother asked him where he lived for the purpose of the form, he himself wondered at first, knowing that "you are supposed to live at your usual residence and . . . I travel the New York-Washington corridor constantly."

Decennial Census Improvement Act of 1987

The remedy for the undercount resulting from the types of problems
he listed is proposed Federal legislation, such as H.R. 3511, "The Decennial Census Improvement Act of 1987" (see appendix B), said Mr. Wice, adding:

That legislation . . . would require that the Census Bureau correct the census for under and overcounts. It would not mandate the method; that would be left to the Bureau. And very importantly, it would also require that the Bureau release only one set of numbers for all purposes, be they reapportionment, Federal funding, information, or statistical uses.

Introduced by Representative Mervyn M. Dymally of California, the bill has been referred to the Committee on Post Office and Civil Service, and several hearings have been held on it, Mr. Wice told the Advisory Committee. He stated that one argument against the goal of the bill is that the proposed correction would yield two sets of numbers, creating confusion and litigation claiming that people are being "made up." However, Mr. Wice stated that H.R. 3511 would address this problem.

As to who stands to win or lose politically in the matter of the census results, Mr. Wice reported that the Library of Congress and other agencies have estimated that the State of New York could lose between two and five seats. But Mr. Wice also said that "it is very dangerous to really discuss the winners and losers

15 The Committee's office reported that this bill would probably not be marked up this session. Telephone interview, Aug. 2, 1988.


because there is fear involved. . . . That really should not be part of the argument on this legislation. We are really talking about . . . one person, one vote, and fairness."

From Three-fifths to Four-fifths of a Person

Angelo Deltoro, New York State Assemblyman and Chairperson of the New York State Legislative Task Force on Demographic Research and Reapportionment, reminded the Advisory Committee that upon its adoption, the original constitutional requirement for the census stipulated that a black person was to be counted as only three-fifths of a white person. Now, Mr. Deltoro argued, "If you look at the progress black people and brown people have made, we are really only up to four-fifths of what a white person is because the traditional 20 percent undercount by the Census Bureau happens in black and brown areas usually." He pointed out, too, that any loss in public funds allotted according to decennial census data is not just a one-year loss, but a loss for each of the ten years between decennial censuses.

As a Hispanic, Mr. Deltoro stated that various groups of Spanish-speaking residents have been confused by one question on the form asking something like "Are you Spanish or Hispanic?" According to Mr. Deltoro, persons from Puerto Rico, the Dominican Republic, or other countries in the Spanish-speaking world answer in terms of the place or country from which their parents come and would not ordinarily identify themselves as Hispanic or Spanish, unless they come from Spain and, therefore, claim the latter designation.18

Mr. Deltoro was also disturbed by a "national movement," as he called it, which is telling the Bureau that only citizens should be counted in the 1990 Census and not "all persons."19 He argued

18See also Martha Farnsworth Riche, Senior Editor, "Making the Numbers Add Up: Asking the Census Bureau How Many Hispanics There Are Is a Tall Order," American Demographics, July 1987, Vol. 9, No. 7, p. 8.

19Several U.S. Representatives may introduce legislation barring aliens from the 1990 count for purposes of reapportionment, and the Bureau estimated three to four million undocumented workers
that omitting noncitizens from the count contradicts the body of the U.S. Constitution, as well as the 14th Amendment which specifically requires that States not discriminate against persons in their jurisdictions. \( ^{20} \) The issue is of special concern to New York State because it is home to many undocumented workers, some of whom, he claimed, have not been well served or helped to become legalized through the amnesty program under the Immigration Reform and Control Act of 1986.

Regardless of their status, undocumented workers must be afforded many public services which are a responsibility of the State and/or local governments, according to Mr. Deltoro. He said that some of these public services may not be equitably funded because of the undercount and its adverse effect on the allocation of Federal resources to New York State.

Remedies and Redistricting Questions

To overcome these problems, Mr. Deltoro suggested that anomalies such as the "four-fifths" status of blacks in the census become exposed and highly publicized. He recommended that to count the homeless the Bureau should hire some of the homeless themselves who would know where to reach many other homeless. With regard to undocumented workers, he urged that a moratorium be called on any raids by the Immigration and Naturalization Service; this would

lived in the U.S. in 1980, two million of whom were counted then. "Political Power and Money at Stake."

\( ^{20} \) Thomas M. Durbin, Legislative Attorney, American Law Division, Congressional Research Service, Library of Congress, analyzed Supreme Court and other Federal court decisions, and concluded that the Constitution's "phrase 'whole number of persons' is to be the basis for congressional apportionment as determined by the census and would include aliens, both legal and illegal. . . . [T]he Framers of the Constitution meant to include all inhabitants, citizens and aliens alike. . . ." The 1990 Decennial Census and the Counting of Illegal Aliens, CRS Report for Congress, 88-62 A, Jan. 13, 1988, p. CRS-12. See also Glenn Simpson, "Aliens, Minorities Subjects of Tussle as '90 Census Nears," Washington Times, Mar. 18, 1988, p. B-6. The Bureau reportedly agrees that excluding aliens from the count would be unconstitutional, according to Rich, "Political Power and Money. . . ." ibid., n. 12, p. 5.
encourage the workers to allow themselves to be counted. He also believed that the Bureau should consult with the church agencies which have been counseling the undocumented. To start with more accurate address lists, the Bureau should work more closely with local planning commissions and other branches of local government, Mr. Deltoro added.

On the issue of a correction or an adjustment to compensate for any census undercount, Mr. Deltoro urged that such a correction be implemented. He cautioned that the corrections must be worked out down to the census tract level, wherever feasible. Otherwise, an adjustment of the figures to compensate for an undercount of, for example, 500,000 in New York City might mean that the city would be entitled to another congressional district, but which of the five boroughs should gain the new congressional seat--Manhattan, the Bronx? The same question could also be asked at the statewide level: would a new seat or seats go to Buffalo or somewhere else? He told the Advisory Committee that rural areas are undercounted, too.

Mr. Deltoro mentioned that the Bureau has allowed localities to review the census figures for their jurisdictions during a 14-day period prior to the Bureau's certifying the figures. However, 14 days gives insufficient time for the localities to analyze the provisional count and compare it against other records which the localities keep--such as motor vehicle department data on drivers' licenses and car tags and health department lists--and which can serve as a source for cross-checking and gauging the reliability of the census count. Consequently, he recommended allotting more time to localities for their review.

Census Surveys and Post-Census Surveys

Erol R. Ricketts, Assistant Division Director of the Rockefeller Foundation and a former researcher at the Washington, D.C.-based Urban Institute, told the Advisory Committee that his remarks do not represent the views of his employer but of one who has worked with census data down to the census tract level. He cautioned his listeners also against believing that any particular corrective measure adopted by the Bureau might solve the undercount problem.
Basically, in 1990 the Bureau will be taking a large survey, said Dr. Ricketts, and, if it wishes to correct that survey, it would take another survey.\textsuperscript{21} "How good you adjust the first one depends on how good you do the second one," he said.\textsuperscript{22}

Moreover, he voiced his belief that in the early 1990s there is a likelihood of debates and litigation and that whatever correction method is adopted by the Bureau will be challenged by someone who is convinced that a different method should be used. At the same time, Dr. Ricketts stressed that undertaking a census is expensive and that one alternative to continuing with an expensive census every 10 years would be for the Bureau to take a more expensive census at the beginning of one decade to generate solid baseline data; then, at the end of that decade, the Bureau could adjust the baseline figures for use in the new decade.

Dr. Ricketts' alternative is grounded on the assumption that solid baseline data can be generated, and to do that he pointed to some of the steps which Mr. Deltoro urged should be taken in 1990. On the other hand, Dr. Ricketts also remarked that there are groups which prove difficult to count, including some rural populations and urban populations, particularly urban black males between the ages of 18 to 26. He stated that the undercount rate for these black males may be 20 percent, compared to an undercount rate of 1.5 percent for the general U.S. population. His research in the previous year involved reviewing census data with a goal of taking measurements of the so-called underclass, one of the groups most missed by the census. Members of this group often feel they have no stake in society or may not understand their stake or the relationship of their stake to participation in the census, in voting, and the like, according to Dr. Ricketts.


\textsuperscript{22}In "ASA Presidential Address . . . .", Dr. Bailar states, "People on both sides of the argument [for and against adjustment] . . . seem to forget that an adjustment is not a substitute for, but depends on, a good census; adjustment is a means to reduce a residual problem."
Change in Form of Questions and Size of Samples

Charles P. Wang, Chairperson of the Asian/Pacific Islander Census Advisory Committee to the Census Bureau and Executive Director of New York's Chinatown Planning Council, brought up two weaknesses which he thought would affect small populations: the write-in response to a question in the short form and the reduction in the size of the survey sample to receive the long form. He explained that the U.S. Office of Management and Budget had recently decided to require members of the various ethnic groups included under the heading "Asian/Pacific Islander" to write in "Chinese," "Japanese," and so forth when answering the race category question appearing in the short form. But write-in responses complicate forms and may discourage respondents who are limited in their ability to use English, he asserted.23

According to Mr. Wang, this 1990 short form differs from the 1980 Census short form which listed about 11 separate groups that could be checked off.24 Having no such check-off on the 1990 short form decreases the likelihood of an accurate count of the small, often scattered populations such as those presently lumped together.

23 See also "Congressmen Fear Skewed Count in Census," New York Times, Apr. 17, 1988. U.S. Reps. Robert T. Matsui and Norman Y. Mineta are reported to believe that the format "intended to determine the number of Asians in the United States will confuse respondents and lead to inaccurate counts." On the other hand, the article also notes that Bureau Director John G. Keane has said that the Bureau's tests on the wording, format, and placement of the race questions demonstrated that Asians and Pacific Islanders will write in their ethnic group.

under the term "Asian/Pacific Islander." Now that the separate groups may lose their specific identities, he stated that many individuals among the separate groups--such as Chinese, Japanese, Filipino--who came together and first coined the terms "Asian American" and "Pacific Islander" are regretting any usage of those generic terms at the expense of the separate groups.

Mr. Wang said that in 1990 the more detailed Census long form will also not permit a check off of each separate group and added that this 1990 long form will be sent to only 10 million dwellings, or six million dwellings fewer than received the 1980 long form. He suggested that this significant reduction in the size of the sample meant to yield more detailed information jeopardizes the reliability of the estimates of small populations such as those coming under the term Asian/Pacific Islander. Moreover, he pointed out that those groups allowed to identify their race by a checkoff response will become counted by computer, and the computer count will be accomplished earlier in the census reporting process than will be the counting of write-in responses.

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Outreach and Local Preparations

As to the question of an adjustment or correction of the census figures, Mr. Wang agreed with previous speakers that there should be a post-enumeration survey and that corrections should be based on it. He also urged increased hiring of bilingual staff and an increase in the budget for outreach staff proportionate to the increase in the budget for the Bureau's computers and automation requirements. Finally, he recommended that the Commission itself review the situation in more detail and invite the chairpersons of the Bureau's other Racial/Ethnic Advisory Committees, who do not happen to be from New York State.

Regarding outreach, Charles N. Weinstock, Assistant Corporation Counsel of the Law Department of the City of New York, said that there was a dramatic amount of outreach performed by the Bureau in 1980 and that such outreach efforts must be continued. He added, however, that spending as much money or hiring as many bilingual staff as possible, and advertising the 1990 Census in all sorts of newspapers and community publications "is never going to do the trick. . . . There is a fundamental resistance to participating in the census among very significant populations."

Mr. Weinstock spoke of the homeless and also of the thousands of families doubled up with other families, speculating that those who are doubled up "are not going to tell how many are living in that apartment because it is an illegal occupancy." He mentioned foreign languages spoken by New Yorkers which will not appear in translated versions of the census form. For such reasons, "The only way you are going to begin to make a dent in the undercount is to do the correction, and that's really the premise of" H.R. 3511, claimed Mr. Weinstock.

As to local preparations for the 1990 Census, Mr. Wang stated that

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report . . . on the social and economic characteristics of six Asian groups--Cambodian, Hmong, Indonesian, Laotian, Pakistani, and Thai" was available, though information on the six largest Asian groups became available in 1982 and 1983, according to a Census Bureau release, "More of Asian and Pacific Islander Families Have at Least Two Workers Than Do Other U.S. Families, Census Bureau Says," CB88-59, Apr. 8, 1988, pp. 1-2.
to his knowledge the Bureau has not begun the kinds of programs which it implemented for the 1980 Census, such as organizing what were then called "Complete Count Committees." However, according to Mr. Wang, the hiring of some temporary staff has started in the Bureau's regional office, and some jobs will continue until 1992.

Bureau's Continuing "Imputations" Constitute Correction

Mr. Weinstock pointed out that in 1970 the Bureau added 5 million people to the count through a process called imputation; in 1980, the Bureau added 3.3 million. As an example, Mr. Weinstock said that, if the Bureau received a questionnaire which states in one section that a household is occupied but states in a different section that no people live in that household, the Bureau is faced with two inconsistent answers. In that case, the Bureau may "just assume that the questionnaire directly underneath that in the pile constitutes a similar household and . . . use[s] their figures."

Mr. Ricketts further explained that an adjustment or correction in the 1990 Census would base the imputation on a post-census survey. "This is just something that any researcher does with records. You try to sort out inconsistent records."

Mr. Weinstock noted that the New York State Advisory Committee is an arm of the U.S. Commission on Civil Rights, an agency within the Executive Branch. He observed that, if the Advisory Committee were to urge that an adjustment or correction of the 1990 Census figures be made, it could go directly to the Bureau, which is also an Executive Branch agency, instead of going to the Congress to ask the Congress to tell the Bureau to make corrections. Dr. Nishi, however, explained that the Advisory Committee's function is to gather information and submit it to the Commissioners for their consideration.

Summary

Preparations for the 1990 Census are moving apace. For example, census questionnaires are expected to be printed in early 1989. Against that backdrop, the Advisory Committee invited elected or
appointed officials of New York State and City governments, the
volunteer chairperson of a minority advisory committee to the
Bureau, a scholar-researcher who has carried out independent
demographic studies, and a Census Bureau official to discuss the
1990 count. The Advisory Committee was especially interested in
the question of the feasibility and desirability of adjusting the
count to compensate for an anticipated undercount, a phenomenon
known to affect minorities disproportionately. At the same time,
it examined the proposal for changes on the question used to
enumerate Asians and Pacific Islanders.

Although the Bureau declined to attend shortly before the forum,
all other panelists did participate. Since the participants were
also members of the white, black, Hispanic, and Asian communities,
the Advisory Committee benefited from hearing from proponents of
adjustment who come from a range of backgrounds. (Some partici-
pants cited the work of a high Bureau official who had advocated
adjustment, and her view is incorporated among the footnotes and
in appendix C.) The Bureau's own extensive comments on the forum
reflect many current arguments opposed to adjustment.

Regarding Asian/Pacific Islanders, the U.S. Office of Management
and Budget had decided to require the various ethnic groups in
this race category to write in their ethnicity in 1990 instead of
merely checking off their ethnicity as was done in 1980.
June 30, 1988

Mr. Tino Calabia  
New York State Advisory Committee  
U.S. Commission on Civil Rights  
1121 Vermont Avenue, N.W.  
Washington, D.C. 20425

Dear Mr. Calabia:

Thank you for the opportunity to provide comments for inclusion in the summary report of the New York State Advisory Committee entitled "Census Undercounts and Preparations for the 1990 Census." I am sorry for any misunderstanding that led you to believe I would participate in your forum.

The Census Bureau has a long-standing cooperative relationship with the U.S. Commission on Civil Rights, and I am pleased to have the opportunity to contribute. Your report touches on a number of important issues relating to the 1990 census. I will comment briefly on many of these issues. Where appropriate, I also enclose documentation that provides additional information on these topics.

1980 Undercount in the City of New York

Mr. Peter L. Zimroth, Corporation Counsel for the City of New York, noting that he was citing Census Bureau statistics, stated "that the 1980 census was affected by a 1.5 percent undercount for the U.S. population as a whole and that in the central cities blacks were undercounted by 11.2 percent and Hispanics were undercounted by 10.3 percent."

The Census Bureau does not have an official estimate of the undercount for the total population. We have developed a series of estimates based on different assumptions using two different evaluations of the accuracy of the 1980 census. The first of these is based on the method of demographic analysis. This method constructs estimates of the total U.S. population and its components by race, age, and sex from aggregate statistics on births, deaths, immigration, emigration, past censuses, Medicare enrollment, and other sources. The second evaluation, the 1980 Post-Enumeration Program (PEP), employs sample survey methods to measure directly the distinct components of census error for a sample of persons, thereby to estimate the net error of the census. As displayed in table 8.1 and figure 8.1 in "The
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Coverage of Population in the 1980 Census (Enclosure 1), the 3 demographic estimates for the total population show net undercounts in the range of 1.0 to 1.8 percent. The 12 PEP estimates range much more widely from a net overcount of 1.0 percent to a net undercount of 2.1 percent. The report discusses both the conclusions and limitations of the evaluations.

The Census Bureau does not know how many Blacks and Hispanics were undercounted in central cities since it has never produced net undercount rates for these populations for central cities as a whole. Mr. Zimroth should provide a source for his estimates since they are not Census Bureau estimates.

Mr. Zimroth also said "The City of New York was undercounted by roughly 500,000 people, which is more people than in many large cities in this country. It's obvious that that kind of systematic undercount disenfranchises those people in this country who are already the most disadvantaged." The Census Bureau does not know how many people were missed in New York City. Tables 7.7, 7.8, and 7.9 display 12 sets of PEP estimates of census undercount for 16 cities, including New York City. These estimates are based on different assumptions and show a range of undercount estimates. The estimates of undercount for the noninstitutional population for New York City range from 0.8 percent to 7.9 percent. The percentages are based on corresponding estimates of undercount ranging from 58,435 to 600,403 persons (noninstitutional). Mr. Zimroth's source should be cited.

Because of the nature of the Congressionally mandated apportionment formula, a change in the population count is neither the sole nor necessarily the most important determinant of whether a state gains or loses Congressional seats. Even if the 1980 census count had been adjusted for undercount in New York, New York State would not have gained an additional Congressional Representative using the apportionment method required by law.

Mr. Zimroth also alleges that undercounted jurisdictions lose funds distributed on the basis of population counts. There are a number of reasons why increased population does not necessarily result in increased Federal funds in closed-end formulas. To have a chance for additional funds, the jurisdiction must have more people added proportionately than the average increase for all other comparable jurisdictions. In addition, there are factors in certain formulas that reward population loss or slower growth rates so that added persons would actually cause a jurisdiction to lose funds. Certain factors in the formula are weighted and the relative strength or impact can change over time. Formulas may have built-in constraints that limit the amount of money a jurisdiction receives. When population cutoffs
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serve as eligibility factors, adding persons to a jurisdiction through adjustment may add eligible cities to those who share in a fixed amount of money and, thereby, dilute the funds available to the already eligible cities, resulting in a loss of funds. Jurisdictions claiming that undercount results in loss of funds fail to consider the effect on all grants, fail to recognize that changes can cancel each other out in different formulas, and fail to understand that the distributions are made from a fixed pie, often precluding additional funds for additional purposes.

(Enclosure 2: Statement of Former Associate Director Barbara Bailar at Congressional Hearing. April 5, 1984)

New York Lawsuit on 1980 Census

We now have the Opinion that the U.S. District Court issued following the second trial (Enclosure 3). Since the report discusses the litigation, it is appropriate to include the Court's findings. "Following extensive pre-trial proceedings, a bench trial was held to determine whether the City and/or State were disproportionately undercounted and, more importantly, whether a statistical adjustment would better reflect the true population of the United States on a state-by-state and/or sub-state-by-sub-state basis than the unadjusted census count. For the reasons set forth below, the Court finds as a matter of fact that the Census Bureau correctly determined that an adjustment of the census is not technically feasible or warranted and that no such adjustment should be made."

1990 Census Adjustment Issue

Your report includes an excerpt from an August 1987 address by Dr. Bailar. Not all statisticians agree with Dr. Bailar's conclusion. While the Census Bureau has made considerable progress in developing statistical techniques related to undercount measurement for the 1990 census, there are still serious doubts among statisticians and others both inside and outside the Census Bureau about the Census Bureau's ability to make census counts more accurate through adjustment. There was mixed opinion among Census Bureau staff on our capability to correct the census for estimated under and overcounts. Those with differing opinions include Census Bureau professionals who have studied these issues and the underlying data for several years, considering whether it is possible to improve the decennial census through adjustment. Even if there were agreement among the staff on the likelihood of producing more accurate census results through adjustment, there remain serious operational issues. By and large, those who are managers of the census operations believe that we could not carry out an adjustment operation by the legally mandated deadline of December 31, 1990 for apportionment purposes. (Enclosure 4: Statement of the Director at Congressional Hearing, March 3, 1988)
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Mr. Angelo Deltoro, New York State Assemblyman and Chairperson of the New York State Legislative Task Force on Demographic Research and Reapportionment, cautioned that the corrections must be worked out down to the census tract level. In fact, corrections would be needed at the block level. Many important applications of census data, such as redistricting and fund allocation, use data for small areas. All the characteristics asked in the census have been included because they meet well demonstrated public needs or are required to fulfill legal mandates or implement governmental programs; thus, characteristics are important as well as total population and housing counts. Our coverage measurement methodologies—whether case-by-case matching techniques or demographic analysis—would provide coverage estimates only for large geographic areas and broad demographic groups. To adjust the census, we would need a method or combination of methods to carry these estimates down to the local level and to adjust for characteristics. The adjustments would be based on statistical models rather than on direct estimates for each block. The Census Bureau could not guarantee that each block would be improved by adjustment. In fact, some would be worse. (Enclosure 5: Statement of former Associate Director Barbara Bailar at Congressional Hearing, July 24, 1986)

Mr. Zimroth is correct that the Department of Commerce does not intend to adjust the 1990 Decennial Census population counts. The Department has decided to concentrate on producing the most accurate census possible and we agree with that decision. The October 30, 1987 press release (Enclosure 6) shows the reasons for that decision.

Your report mentions a paper prepared by Census Bureau staff that Mr. Zimroth circulated. As the Census Bureau Director testified at the March 3 hearing on H.R. 3511, differing views on the highly controversial subject of adjusting the census are held by technical, operational, and analytical experts within the Census Bureau. These views are based on unresolved uncertainties about the measurement process and uncertainties about the operational demands required. The five Census Bureau authors whose paper Mr. Zimroth cites all worked on the undercount research staff for Dr. Bailar in the Statistical Research Division. Their conclusions are not shared by all technical, operational, and analytic experts in other divisions of the Census Bureau.

The Census Bureau has received a copy of recent correspondence from the New York State Legislature that states: "While we have heard the arguments for adjusting the census count, we have not found them compelling either in improving the quality of the census data or in the ability to meet deadlines imposed at both the federal and state level.... We support the Census Bureau in their efforts to conduct the most accurate Census ever taken. This agency enjoys a fine reputation, which is well deserved. We have complete confidence in their ability to achieve that goal."
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and it is one that ensures that both the interests of New York and the integrity of the Census will be enhanced.” (Enclosure 7)

Mr. Jeff Wice, Director of the Washington Office of the New York State Assembly, mentions a number of problems that may cause undercounts or overcounts. Without mentioning how 1990 census procedures address these problems, he endorses H.R. 3511 that calls for adjustment. We do not agree. The Decennial Census Improvement Act (H.R. 3511) is not the solution to these problems. In fact, adjustment may introduce additional problems. Mr. Erol R. Ricketts, Assistant Division Director of the Rockefeller Foundation, cautioned your Advisory Committee against believing that any particular corrective measure might solve the undercount problems. Mr. Ricketts mentions the need to conduct a survey after the census, and states “How good you adjust the first one depends on how good you do the second one.” We agree with his statement. A sample survey after the census is likely to encounter the same problems as the initial census—those who for one reason or another are missed in the census are likely to be missed in the survey—and adds other problems such as matching difficulties and missing data that lead to errors. We also agree with his statement that whatever correction method we would adopt, the Census Bureau would be challenged by someone who is convinced a different method should be used. We believe that the census procedures we have developed will address the problems. Many of these procedures were discussed at a Congressional hearing on May 20, 1988 (Enclosure 8).

Improvements to Census Procedures

The following lists the problems cited by some of the forum participants. For each, I have described how the Census Bureau intends to deal with it in the 1990 census.

**Address List Quality:** To compile the address lists for the census, the Census Bureau buys addresses in the more urban areas and lists them itself in the more rural areas, where lists either cannot be purchased or cannot be assigned geographic codes by computer. The lists undergo several quality and completeness checks by our enumerators and by the U.S. Postal Service. The address lists serve to control the enumeration in mail-census areas. Once an address is on the list, we assure that every housing unit is accounted for. If a questionnaire is not returned for a housing unit, enumerators visit the address to complete the enumeration. In the most sparsely populated areas of the country, we do not compile a precensus address list. Instead, enumerators visit door-to-door to complete the enumeration. At the same time, they compile an address list for the area. In these areas, too, we have quality control operations at each stage of the enumeration. We also have special procedures for counting those who live in group quarters (dormitories, barracks, nursing homes, and so forth).
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Broken/Group Mailboxes: We will handle selected urban areas, where we anticipate questionnaire delivery problems, different from other areas. These areas include public housing developments or projects, adjacent areas, and large clusters of boarded-up buildings. In public housing, census enumerators, instead of the mail carriers, will deliver questionnaires door-to-door. Householders will be asked to mail back their questionnaires as in other mail-out/mail-back areas.

English Language Forms: In hard-to-enumerate areas, especially those where we anticipate that language and other barriers may make the enumeration difficult, we plan to mail out a multilingual "early alert" brochure before the questionnaire is mailed out. The brochure will have messages in English, Spanish, and at least three Asian languages—Vietnamese, Korean, and Chinese.

The brochure will alert householders that a questionnaire will be in the mail to them soon, ask them to fill it out and mail it back, and tell them how to get help in completing the questionnaire if they need it. Persons needing help can call the toll-free telephone number that will appear on the questionnaire or they can visit a questionnaire assistance center. We plan to staff both the telephone lines and assistance centers with bilingual enumerators. Persons who cannot or choose not to mail back their questionnaires will be visited by an enumerator. Many of the enumerators will be bilingual and will speak the prevailing languages in their assignment areas. All enumerators will carry translations of the questions. These will be available in about 30 languages, including many Asian languages.

Spanish-speaking persons may request a questionnaire in Spanish. There will be a message in Spanish on all questionnaires explaining how to obtain one.

Curbstoning: The Census Bureau will conduct a quality assurance program during the nonresponse follow up operation to detect and prevent possible fabrication of data.

Multiple Residences: The questionnaire tells respondents that the census must count every person at his or her "usual residence" and that this means the place where the person lives and sleeps most of the time. There is space to enter the address of the usual home when everyone at the housing unit usually lives
somewhere else. (Enclosure 9: Form DX-1, Dress Rehearsal Questionnaire)

**Homeless Population:** The Census Bureau will count components of the homeless population in two major operations, one that is a special operation that will take place at night, and one that is part of the regular enumeration process. First, we will conduct a special operation ("street and shelter night") on March 20, 1990 to count persons in preidentified emergency shelters (public and private) and open locations in the streets or other places not intended for habitation. This special operation includes all hotels/motels costing $12 or less per night, hotels/motels used entirely to shelter the homeless (regardless of cost), and pre-identified rooms in hotels/motels used for homeless persons and families. Enumeration will occur when the population is generally settled for the night. For shelters, enumeration will usually occur from 6 p.m. to midnight; street enumeration, from 2 a.m. to 4 a.m.

Other components that are sometimes included in the count of the homeless population will be enumerated as part of the regular census operations. These include "doubled-up families," homes for abused women, and institutions such as local jails that may provide temporary shelter. In some such places, we will not know who has a usual home and such persons cannot be identified separately as homeless. (Enclosure 10: Summary of 1990 Census Plans for Enumeration of the Homeless)

**Undocumented Immigrants:** Mr. Deltoro mentioned both the Immigration and Naturalization Service and church agencies. The Census Bureau is discussing issues relating to the enumeration of the undocumented immigrant population with the Immigration and Naturalization Service. We also agree that religious organizations can play an important part in encouraging their members to answer the census. We have established contact with the Bishops Committee on Hispanic Affairs of the U.S. Conference of Catholic Bishops. We hope to have their endorsement as well as that of the entire U.S. Conference, which we did not have in 1980.

**1990 Local Review Program**

Mr. Deltoro also mentioned the Local Review Program and questioned the adequacy of 14 days for this review. This program is designed to improve the accuracy of the census by helping to pinpoint such problems as clusters of missed housing units, geographic misallocations (housing units listed in the wrong location), or incorrectly displayed political boundaries. It will be necessary for local or tribal governments to substantiate major discrepancies by using their own data on the number of housing units at the block level. Current record-keeping systems such as utility records, tax assessment files, and building and
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demolition permits used in conjunction with other benchmark data can be used to create local estimates. In November 1989, the Census Bureau will send a listing (for governmental units in mail-out/mail-back counties only) that contains the precensus housing unit and special place counts as of July 1989 for all census blocks within and adjacent to the governmental unit. The local and tribal governments have 45 workdays from receipt of the precensus listing to complete their review and identify any major discrepancies at the block level by annotating the local estimates and the source(s) of documentation on the listing. In January 1990, the Census Bureau will recanvas those blocks within or adjacent to the governmental unit that contain major discrepancies between the census counts and the local estimates and make corrections, as necessary.

After the census, the Census Bureau will deliver the postcensus listing (for all governmental units) that includes the counts for housing units and group quarters population. Local and tribal governments must complete and return any response to the local district office manager within 15 workdays from the receipt of the postcensus counts. The Census Bureau will check the blocks with major discrepancies for each governmental unit and correct its address and data files, when necessary. (Enclosure 11: 1990 Decennial Census Local Review Program Information Booklet)

Enumeration and Residence Rules for the 1990 Census

Mr. Deltoro expressed concern about a "national movement" regarding the enumeration of undocumented immigrants in the census. This issue currently is in litigation (Ridge et al. v. Verity et al.).

1990 Census Question on Spanish/Hispanic Origin

Mr. Deltoro stated that Spanish-speaking residents have been confused by the question on Spanish/Hispanic origin. The Census Bureau embarked on an extensive 1990 census program for race and ethnicity, covering several years, to develop the best possible 1990 census questions based on research, consultations with a variety of data users, assessment of data needs, and testing. The findings of the Special Urban Survey, together with the qualitative information generated by focus group interviews and previous tests and consultations, provided sufficient evidence to choose the modified 1980 question for the 1990 census. (Enclosure 12: "Development of the Race and Ethnic Items for the 1990 Census," presented at the 1988 Annual Meeting of the Population Association of America, April 1988) The recommended 1990 question on Hispanic origin will be asked of all persons. The question lists four Hispanic categories with a write-in line
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for "other Spanish/Hispanic" groups. The instructions for this question state that "A person is of Spanish/Hispanic origin if the person's origin (ancestry) is Mexican, Mexican-Am., Chicano, Puerto Rican, Cuban, Argentinean, Colombian, Costa Rican, Dominican, Ecuadorian, Guatemalan, Honduran, Nicaraguan, Peruvian, Salvadoran; from other Spanish-speaking countries of the Caribbean or Central or South America; or from Spain" (Enclosure 13).

1990 Census Race Item

Mr. Charles P. Wang, Executive Director of New York's Chinatown Planning Council, expressed concerns about the race item. The Census Bureau's major objectives for the 1990 census race question are to meet the increased data needs and improve the quality of the race data. To achieve this, we implemented a multifaceted 7-year program to develop the best possible race question. Our final decision on the wording and format of the item is based on research, consultations with a variety of users, assessment of data needs, and extensive testing. It is the judgment of our professionals that we will obtain the most accurate and reliable data for all race groups in 1990 from the proposed race question. This is supported by the 1986 National Content Test and the Censuses of Central Los Angeles County and East Central Mississippi that showed that this question version provided more accurate and consistent reporting for racial groups, particularly the Asian and Pacific Islander population, than the 1980 modified question that listed specific Asian and Pacific Islander groups. To ensure the most complete reporting for all racial groups, we tested further refinements to the proposed race question in the 1987 Special Urban Survey and focus group sessions. The Special Urban Survey was focused on areas with substantial numbers of the newer immigrant Asian and Pacific Islander groups.

The Census Bureau, not the Office of Management and Budget, has decided on its final proposal. The 1990 census race question includes seven categories—White, Black, Asian or Pacific Islander, American Indian, Eskimo, Aleut, and Other. The question has a write-in space for entering a specific racial group or tribe for the categories Asian or Pacific Islander, American Indian, and Other races. We will implement a coding operation for race as an integral part of our processing system. This allows us to tabulate and publish 100-percent data on all Asian and Pacific Islander groups and American Indian tribes in 1991, along with data for the White, Black, American Indian, Eskimo, Aleut and Hispanic populations. Consequently, a 1990 census standard product based on 100-percent tabulations will provide population counts for at least 26 Asian and Pacific Islander groups, an improvement over the 1980 census where data were available for only 9 Asian and Pacific Islander groups. (Enclosure 14 is the "Decision Paper on the 1990 Census Race Item"; Enclosure 15 shows the recommended question and instructions)
Mr. Tino Calabia

1990 Census Questionnaires: Sample Size

Mr. Wang also expressed concern about the number of housing units that will receive the 1990 "long form." The Office of Management and Budget and the Census Bureau have agreed on the number of households to be sampled in the 1990 census. Under the agreement, some 17.7 million housing units will receive a long form in 1990 out of an estimated total of 106 million units. The enclosed press release also describes the subjects planned for the 1990 census. (Enclosure 16)

1990 Census Outreach Activities

Mr. Charles Weinstock, Assistant Corporation Counsel of the Law Department of the City of New York, commented on the 1980 outreach program and added that the 1990 program "is never going to do the trick." We believe it will be successful. While answering the census questionnaire is mandatory by law, the Census Bureau cannot do its job unless there is widespread public support for the census and recognition of its importance. Our promotion campaign will be designed to emphasize the importance of everyone being in the census and to ease concerns about census confidentiality. We will provide news stories, features, photos, illustrations, maps, and other background information to news media outlets. We signed a contract with The Advertising Council (AD Council) to undertake an ambitious public service advertising campaign. We will ask educators, minority organizations, governments, private businesses, associations and unions, and prominent figures to help us get our message across. (Enclosure 17: "Promoting the 1990 Census: A Preview")

We are directing special promotion efforts toward minorities. We asked the AD Council to arrange for the services of minority ad agencies to supplement the general campaign and to appeal more directly to minority audiences. We are conducting a series of one-on-one meetings with the mayors of about 350 cities, making special efforts to include cities with large minority communities. These meetings are to discuss mutual concerns about the 1990 census and possible joint efforts for encouraging the cities' populations to be counted in 1990. Working through national minority organizations is another key part of our promotion campaign. We staff exhibit booths at meetings, conduct workshops, and make presentations. New for 1990 is an effort to formalize, at the highest levels, the active participation of national organizations in the 1990 census.

We also seek to energize local minority community action groups and service providers to support the census by encouraging their members and clients to be included. We do this through one-on-one contacts between our community awareness specialists and the leaders and membership of the community groups.
We recognize that national advertising campaigns will not necessarily reach all population groups in all areas of the country. That is why we will ask local jurisdictions to establish complete count committees to design local promotion efforts. Under a new program formally introduced for 1990, we have asked each American Indian tribal government and Alaska Native village government to designate a liaison to serve as the primary contact with the Census Bureau on the 1990 census. The aim of this program is to improve the participation of American Indians and Alaska Natives in the 1990 census.

For the 1990 census, we have earlier and more systematic contact with both national and local religious organizations, better program materials, and an expansion of the program beyond promotional activities to provide questionnaire assistance and other kinds of help. Our census education project is to promote awareness and knowledge of the census among all school children who will in turn pass that awareness and knowledge on to their families. We had an education project for the 1980 census, but for 1990 we started planning earlier, did more testing of the materials, and sought more advice from education experts around the country. We will make some education materials available in Spanish. And census community awareness specialists will urge schools in hard-to-enumerate areas to use the materials. We also have been working closely with the National Head Start to plan promotion of the census through the local head Head Start agencies. This effort, new for 1990, is specifically designed to reach the low income population and supplements our school project.

(Enclosure 8)

Conclusion

I have attempted to address the major issues in your report. We responded carefully and thoughtfully to these major points. The enclosures provide the documentation you seek from the Census Bureau. If you have additional, specific questions, I will be pleased to respond further.

Thank you for your interest in the 1990 census.

Sincerely,

ROLAND H. MOORE
Associate Director for Field Operations
Bureau of the Census

[All 17 enclosures are on file in and available from the Eastern Regional Division office and also on file at the Bureau of the Census.]
100TH CONGRESS 1ST SESSION

H.R. 3511

To amend title 13, United States Code, to remedy the historic undercount of the poor and minorities in the decennial census of population and to otherwise improve the overall accuracy of the population data collected in the decennial census by directing the use of appropriate statistical adjustment procedures, and for other purposes.

IN THE HOUSE OF REPRESENTATIVES

OCTOBER 20, 1987

Mr. Dymally (for himself, Mr. Schumer, Mr. Green, Mr. Garcia, Mr. Ackerman, Mr. Berman, Mr. Biaggi, Mr. Boehler, Mr. Crockett, Mr. DeLago, Mr. Dixon, Mr. Downey of New York, Mr. Fauntroy, Mr. Fish, Mr. Flake, Mr. Fuster, Mr. Gilman, Mr. Gray of Pennsylvania, Mr. Hawkins, Mr. Hochbrueckner, Mr. Horton, Mr. LaFalce, Mr. Leland, Mr. Lent, Mr. Levin of Michigan, Mr. Manton, Mr. Martin of New York, Mr. Matsui, Mr. McHugh, Mr. Mrazek, Mr. Nowak, Mr. Owens of New York, Mr. Rangel, Mr. Richardson, Mr. Roybal, Mr. Scheuer, Ms. Slaughter of New York, Mr. Solarz, Mr. Stark, Mr. Stokes, Mr. Stratton, Mr. Torres, Mr. Towns, and Mr. Weiss) introduced the following bill; which was referred to the Committee on Post Office and Civil Service

A BILL

To amend title 13, United States Code, to remedy the historic undercount of the poor and minorities in the decennial census of population and to otherwise improve the overall accuracy of the population data collected in the decennial census by directing the use of appropriate statistical adjustment procedures, and for other purposes.
Be it enacted by the Senate and House of Representa-
tives of the United States of America in Congress assembled,

SECTION 1. SHORT TITLE.

This Act may be cited as the "Decennial Census Im-
provement Act of 1987".

SEC. 2. AMENDMENTS RELATING TO THE DECENNIAL CENSUS
OF POPULATION.

(a) In General.—Section 141(a) of title 13, United
States Code, is amended—

(1) by inserting "(1)" after "(a)";

(2) by striking out "1980" and inserting in lieu
thereof "1990";

(3) by striking out "date'," and all that follows
thereafter through "surveys." and inserting in lieu
thereof "date'. Subject to paragraph (2) of this subsec-
tion, each such census shall be taken in such form and
content as the Secretary may determine, including the
use of sampling procedures and special surveys."; and

(4) by adding at the end the following:

"(2) In taking any census under this subsection, the
Secretary shall adjust the population data to correct for any
undercounts or overcounts, using the most accurate methods
available. The adjusted population data shall constitute the
official census data for all purposes for which decennial
census data are used, whether under this title or any other provision of law.”.

(b) Reporting Requirement.—Section 141(f) of title 13, United States Code, is amended—

(1) by inserting “(1)” after “(f)”;

(2) by redesignating paragraphs (1) through (3) as subparagraphs (A) through (C), respectively;

(3) by striking out “paragraph (1) or (2) of this subsection” in subparagraph (C) (as so redesignated by paragraph (2) of this subsection) and inserting in lieu thereof “subparagraph (A) or (B) of this paragraph”; and

(4) by adding at the end the following:

“(2) With respect to each decennial census conducted under subsection (a) of this section, the Secretary shall submit to the committees of Congress having legislative jurisdiction over the census—

“(A) not later than 1 year before the appropriate decennial census date, a report containing the Secretary’s proposed plan for adjusting population data to correct for any undercounts or overcounts, as required by subsection (a)(2) of this section, including a description of any surveys, sampling, or other statistical procedures proposed to be used, as well as the projected timetable for carrying out any such procedures; and
“(B) after submission of a report under subparagraph (A) of this paragraph, if the Secretary finds new circumstances exist which necessitate that any matter contained in such report be modified, a report containing the proposed modifications, including a detailed statement of justification therefor.”.

SEC. 3. CLARIFYING AMENDMENT RELATING TO THE USE OF SAMPLING.

Section 195 of title 13, United States Code, is amended to read as follows:

“§ 195. Use of sampling

“The Secretary shall, if he considers it feasible, authorize the use of the statistical method known as ‘sampling’ in carrying out this title. In taking a decennial census of population, the use of sampling shall be governed by applicable provisions of section 141 of this title.”.
May 19, 1988

Mr. Tino Calabia
N.Y. State Advisory Committee
U.S. Commission on Civil Rights
1121 Vermont Avenue, N.W.
Washington, D.C. 20425

Dear Mr. Calabia:

Thank you for your recent letter and the copy of the draft report on the November forum on the 1990 Census. I'm enclosing a copy of my ASA Presidential address which has now been published.

I enjoyed reading the draft report. To my mind, it was complete and stated the facts.

Sincerely,

Barbara A. Bailar
Executive Director

Enclosure
Statistical Practice and Research: The Essential Interactions

BARBARA A. BAILAR*

Now let’s turn to some of our successes within ASA. One of these successes is the way we sometimes work together on major problems of public policy. Statistical thinking as well as statistical techniques and statistical data must play a large role in the evaluation of different policy actions. It is not enough for statisticians to view themselves as problem solvers; they must sit at the table when policy determinations are being made. Public policy is too important to be left to politicians and advocates.

One important public-policy issue is what to do about the census undercount. The Census Bureau does a remarkably good job of counting the population every 10 years, achieving about 98%-99% coverage; however, that small percentage of undercount is heavily concentrated in minority populations. The Census Bureau undercounts the black population at about a 5% rate, and the undercount rate for black males in certain age groups may be as high as 20%. The problem also affects Hispanics, Asians, and American Indians. After the 1980 census, the Census Bureau was sued by many states, cities, and towns asking for a statistical adjustment of the undercount. There were methods available to make an adjustment, but the application of those methods to the 1980 census would have been severely flawed, even to the point of distorting coverage further. Soon after the 1980 census, a large and intense research effort to improve the measurement and the distribution of the undercount was launched by the Census Bureau, but this effort was not ours alone. Over the last seven years, the Census Bureau has regularly reviewed its research and the implementation of its research in test censuses with the ASA Census Advisory Committee and with the Panel on the Decennial Census appointed by the Committee on National Statistics. We have worked well together.

Statisticians have not only contributed to this technical work; many have also testified at various Congressional hearings and in courtrooms, giving the benefit of statistical thinking to policymakers. This broad review of the issue, with the involvement of statisticians, users of census data, and representatives of the populations affected, as well as the interaction with lawyers and politicians, has made the undercount research and discussion one of the best efforts the Census Bureau has made. A sizable group of eminent statisticians now believes that adjustment of the coming 1990 census is feasible, that it has been successfully demonstrated in test censuses, and that it would substantially improve the accuracy of the 1990 census.

Those who press for adjustment say that an undercount in 1990 is inevitable, a view that the Census Bureau largely shares. They argue that even an imperfect adjustment will be a move in the right direction and will increase the accuracy of census data for its many uses. Others caution that an adjustment might lessen participation in the census, and some still worry about the adequacy of the statistical techniques to make an adjustment.

People on both sides of the argument hear selectively. Many who favor adjustment, but do not understand the methodology, talk about how adjustment will take care of the problems of counting illegal aliens, people living in illegal housing, and the homeless. Many who are against adjustment talk about the confusion of two sets of books, the danger of overadjustment, and the sapping of the will of people to be counted. Both sides seem to forget that an adjustment is not a substitute for, but depends on, a good census; adjustment is a means to reduce a residual problem. Finally, we should remember why an adjustment is even contemplated. Mervyn Dymally, Chairman of the House Subcommittee on Census and Population, said recently, “It is clear to me that we cannot ensure constitutional mandates of equal representation and the right to vote, nor begin to adequately address numerous social and economic problems, if the very numbers on which we base our fundamental policies are wrong” (Dymally 1987).

Given that the Census Bureau does a very good job of covering the mainstream population, the consensus of the statisticians (statisticians from government, industry, and academe; statisticians who have carefully reviewed all of the work in this area) is that an adjustment will provide more accurate data on the size, location, and demography of the minority populations in this country. It’s time to get on with the job!

* Barbara A. Bailar was Associate Director for Statistical Standards and Methodology, U.S. Bureau of the Census, Washington, DC. This article was presented as the presidential address at the 1987 annual meeting of the American Statistical Association in San Francisco.
Census Undercounts Too Imprecise to Adjust

To the Editor:

The headline on your Jan. 30 editorial "When the Census Is Precisely Wrong" sheds more heat than light on an already heated topic. In fact, the estimate of the undercount of the population in the decennial census is imprecise, and potential techniques for adjusting the undercount are imprecise, and that is precisely why the Department of Commerce is not going to adjust the 1990 Census. It is disingenuous for you to suggest that the Department of Commerce's decision was partisan and that those who favor adjustment are motivated only by a desire for statistical precision.

You imply that there is agreement within the statistical community on the theoretical feasibility of adjustment and on the preferred technique for adjustment. There isn't. The Census Bureau has conducted, and will continue to conduct, extensive research on how to measure the undercount and how to improve the decennial census. But a majority of professionals in the Census Bureau, especially among those with responsibility for actually conducting the Census, oppose adjustment of the 1990 Census because they fear it will lead to less accurate, rather than more accurate, results.

Statistics Canada, the bureau's Canadian counterpart, has had a research program on its undercount since 1961. Having examined procedures similar to those considered by the Census Bureau, it has decided not to adjust its census counts. Further, some statisticians outside the bureau oppose any form of adjustment, and others have their own favorite alternative technique.

There are practical difficulties as well. The additional survey required to make the adjustment would divert resources and attention away from the basic count of the population. And, operationally, the bureau probably would not have the time to adjust the Census to meet legal deadlines for publishing population data. As a result, it would likely have to publish two sets of numbers. In light of all these uncertainties, we concluded that adjustment would perpetuate and amplify controversy, and lead to more legal challenges.

You suggest the bureau has used techniques similar to adjustment in the past. We have imputed population to specific physical locations, but this is vastly different from constructing a mathematical model that adds population to specific neighborhoods. With imputation, if enumerators are unable to interview members of a household, but determine from physical evidence, such as utility bills and interviews with neighbors, that the housing unit is occupied, they may include that unit in the census count.

With adjustment, a model would be used in order to add residents to a specific block, even though there is no physical evidence that anyone lives there. Proponents of adjustment for the purposes of apportionment and redistricting should realize that adjustment would have to be carried down to the block level in order for it to be valid. And there is considerable skepticism within the statistical community that we can accurately adjust the census to that level of detail.

The Bureau of the Census has made steady improvements in each census since 1950 to reduce the estimated undercount of minority populations. We have taken a number of steps to ensure that the 1990 Census further reduces the undercount. Our budget is the highest on record, even after adjustment for inflation; we have consulted earlier with state and local officials; and we are expanding publicity and outreach to make everyone aware of the importance to them and their community of being counted.

We plan to conduct the best census ever in 1990. We will expand our use of the methods that have helped us in the past to reduce the undercount. But we will not use methods that will not improve the count and that may undermine the public's confidence in the accuracy and integrity of the nation's census. ROBERT ORTNER Under Secretary, Economic Affairs Department of Commerce Washington, Feb. 4, 1988

Use Political Process

To the Editor:

"When the Census Is Precisely Wrong" supports the bill on Census adjustment introduced by Representative Mervyn Dymally of California and Senator Daniel Patrick Moynihan of New York. However, techniques for census adjustment could easily introduce more mistakes than they fix. The reason is they rely on complicated and error-prone procedures, like computer matching of very large files. The Dymally Bill does not mandate research, but compels adjustment. It should be opposed for that reason.

Our cities deserve more Federal money. That should be pursued in the political process, not by census tampering.

DAVID FREEDMAN Professor of Statistics University of California Berkeley, Calif., Feb. 2, 1988
More '90 Race Data Planned

Write-In Categories Proposed for Asian and Pacific Islander Groups

4. Race

Full ONE circle for the race that the person considers himself/herself to be.

If Asian or Pacific Islander, print one group.

If Other race, print race.

- O White
- O Black or Negro
- O Asian or Pacific Islander (Print one group, for example Chinese, Filipino, Asian Indian, Japanese, Hawaiian, Korean, Samoan, Vietnamese, etc.)
- O Indian (Amer.) (print the name of the enrolled or principal tribe)
- O Eskimo
- O Aleut
- O Other race (Print race)

The race question has been designed to meet increased needs for data and to improve data quality for all racial groups. Our research, field tests, and meetings with many groups have led us to conclude that this is the best wording for the question.

The proposed question includes seven categories: White, Black or Negro, Asian or Pacific Islander, American Indian, Eskimo, Aleut, and "Other." A new feature is a write-in space for entering a specific racial group (e.g., Chinese or Hawaiian) in the Asian or Pacific Islander category.

In the proposed question, as in the 1980 question, people identifying themselves as American Indians can specify their tribe. There is also a space for the race category "Other." A separate question deals with Hispanic origin or descent.

The race question has been designed to meet increased needs for data and to improve data quality for all racial groups. Our research, field tests, and meetings with many groups have led us to conclude that this is the best wording for the question.

Our 1986 National Content Test and the censuses of central Los Angeles County and east central Mississippi, for example, showed that this version provided more accurate and consistent reporting for racial groups, particularly the Asian and Pacific Islander population, than the modified 1980 question that listed specific groups and had a write-in space for "other Asian and Pacific Islander."
100-Percent Census Counts

American Indian Tribes

1980 Census
No 100-percent counts available; only sample information.

1990 Census
100-percent counts for approximately 200 tribes to be included on computer tape and in a subsequent special report.

Asian and Pacific Islander Groups

1980 Census (only 9 groups)
Asian Pacific Islander
Chinese Hawaiian
Filipino Samoan
Japanese Guamanian
Korean
Asian Indian
Vietnamese
(Only sample information for “Other Asian and Pacific Islander” groups.)

1990 Census (approximately 26 groups)
Asian Pacific Islander
* Chinese Polynesian
Filipino Hawaiian
Japanese Samoan
Korean Tongan
Asian Indian Tahitian
Vietnamese All Other Polynesian
Laotian Micronesian
Thai Guamanian
Cambodian Northern Mariana
Pakistani Islander
Indonesian Palauan
Hmong All Other Micronesians
Burmese Melanesian
Bangladesh Fijian
Sri Lankan All Other Melanesian
Malayan Pacific Islander, not specified
Okinawan
All Other Asian
*Taiwanese will be shown separately from Chinese only in special publications on the Asian and Pacific Islander population.

90 Census Race Counts

Continued from page 1
To ensure the most complete reporting for all racial groups, we tested further refinements to the proposed race question in the 1987 Special Urban Survey and focus group sessions. The Special Urban Survey was taken in geographic areas with substantial numbers of the newer immigrant Asian and Pacific Islander groups. These tests all showed that the proposed question obtained the best results.

Outreach Helps Overcome Language Barriers

A strong outreach program, we believe, is the key to an accurate census. We will make special efforts to identify and provide help in those geographic areas with concentrations of newer immigrants.

In these areas, we plan to mail out a multi-lingual motivational card, with messages in English, selected Asian languages, and Spanish, before we mail the 1990 census questionnaires. The messages will alert householders that a questionnaire will be coming soon with a phone number for assistance.

Also, we will make greater efforts to staff the questionnaire assistance telephone lines with persons who speak Asian languages; to set up and staff assistance centers with bilingual persons to help respondents fill out the form; and to recruit and hire bilingual enumerators. We believe that these and many other efforts should ensure an improved enumeration of the Asian and Pacific Islander population in the 1990 census.

Data Published for Many Groups

Users won’t have to wait long for race data from the census. Beginning in early 1991, we will publish data on White; Black; total American Indian, Eskimo, Aleut; and total Asian and Pacific Islander population groups. Advances in technology will permit the release (beginning in mid-1991) of population counts for at least 26 Asian and Pacific Islander groups and American Indian tribes based on write-in entries. We will publish information for over 200 tribes in an special early report.

The timetable is considerably earlier than after the 1980 census, which produced 100-percent data for only nine Asian and Pacific Islander groups and only sample data for American Indian tribes.

We will publish social and economic data for more Asian and Pacific Islander groups than in 1980.

For 200 years the race question has helped our Nation measure its cultural diversity. The Census Bureau will ensure that this question continues to provide as accurate a measure as possible.

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