



**MIKE FEUER
CITY ATTORNEY**

August 3, 2020

VIA E-MAIL

Dr. Ron Jarmin
Deputy Director and Chief Operating Officer
U.S. Census Bureau
United States Department of Commerce
Washington, D.C. 20233-0001
ron.s.jarmin@census.gov

RE: U.S. Census Bureau Plan to Truncate Nonresponse Followup Operations and Self-Response Period

Dear Dr. Jarmin:

I write to request that you immediately (1) indicate whether the U.S. Census Bureau (“the Bureau”) intends to shorten the period for its Nonresponse Followup (“NRFU”) operations, the self-response period, or both; and (2) if so, articulate the basis for its decision(s).

According to recent news reports, the Bureau intends to cut short its NRFU operations by roughly a month, and may be considering similar cuts to the period within which residents can self-respond to the Census.

Census nonresponse in hard-to-count communities, including those in the City of Los Angeles, is a serious, ongoing problem for the accuracy of the decennial Census, posing the substantial risk that crucial public funds and political representation will be improperly allocated. The coronavirus pandemic and associated challenges have only exacerbated the potential for nonresponse, as has the Administration’s failed attempt to include a citizenship question in the Census, its attempt to preclude noncitizens from being counted for purposes of legislative apportionment, its attempt to collect citizenship data from States, and its incendiary rhetoric with respect to immigrants in general.

Few areas of the country are more affected by this nonresponse than the City of Los Angeles, where your own data indicate that the current nonresponse rate is *nearly 50 percent*—well above the

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nonresponse averages for California and the nation as a whole. As a result, it appears all but certain that the enumeration of Los Angeles will be inaccurate—the only question is how profound the inaccuracy will be.

Thus, maximizing the time for self-response and conducting robust NRFU operations are vital to the accuracy of this Census. A longer self-response period will permit the Bureau's and local governments' educational efforts to have their intended effect, encouraging participation. Failing that, however, NRFU must fill the gap. As you know, nonresponse leaves "NRFU responsible for determining the status of [households that do not self-respond to the decennial Census], and if occupied, enumerating them." U.S. Census Bureau, NRFU Detailed Operational Plan, Version 2, Final, 2 (July 15, 2019). In other words, NRFU is the last line of defense against inaccuracy and is vital to ensuring anything like an accurate enumeration given high nonresponse rates.

I am deeply concerned that the Census will be tremendously inaccurate—with sweeping, deleterious consequences for the proper determination of vital public funding allocations and political representation—if the reports are correct that the Bureau intends to shorten the previously announced October 31, 2020, deadline for NRFU, and simultaneously shorten the period for self-response. I question what basis the Bureau could have for such decisions, given their predictable impact on Census accuracy. Such decisions would be all the more troubling given that residents may have relied on the previously announced deadline for participation.

Particularly if the Bureau intends to halt its NRFU Operations or end the self-response period in roughly 60 days, time for the City to appropriately respond and protect its residents runs short. We request that you immediately respond to this letter and indicate whether the Bureau intends to shorten the period for its NRFU operations, the self-response period, or both, and, if so, that you immediately explain the basis for those decisions.

Sincerely,



MICHAEL N. FEUER
Los Angeles City Attorney