

March 17, 2008

To: The Honorable Carlos M. Gutierrez
Secretary of Commerce

From: The Honorable Kenneth Prewitt
Member, 2010 Decennial Census Panel of Experts
Past Director, U. S. Census Bureau (1998-2000)

Mr. Secretary:

Support for the Task Force Report's Recommendation

I agree that the current and prospective circumstances facing the 2010 census make Alternative Two (a paper and pencil NRFU) the least risky choice among the high risks options presented in the Report. I additionally support the recommendation made by Vince Barabba that Congress provide a census contingency fund -- though having strenuously and unsuccessfully argued for such a fund in the lead-up to the 2000 census I appreciate the difficulty this poses for the OMB.

Recommendation to Consider a Major Design Change for NRFU

I believe that NRFU sampling could further reduce the risk of a poor census in 2010, and I recommend that you explore that option. Specifically, I would suggest that you ask two members of the Expert Panel with expertise in this area, Vince Barabba and John Thompson, to review the properties of sampling for NRFU. In order to draw necessary distinctions between NRFU sampling and dual-system estimation, it may be helpful also to consult with statisticians who opposed dual-system estimation during the 2000 census.

I offer reasons for this recommendation, and then summarize the major arguments against considering NRFU sampling.

Reasons to Consider:

a) An undemocratic census fails in its constitutional obligations. Census 2010 will be a more undemocratic census than Census 2000, defining "undemocratic" as a census that fails to achieve distributional accuracy (to count all places and population groups proportionate to their population shares). If the census misses 1% of the population equally in every state, apportionment is still democratic. If it misses 1.5% in one state and .5% in another, it is undemocratic with respect to apportionment. For reasons easily confirmed in a conversation with Census Bureau leadership, the prospects for a distributionally accurate census in 2010 are low even if Alternative #2 is adopted.

b) The Census Bureau has experience with NRFU sampling. It is being used successfully in the American Community Survey. The initial plan for the 2000 decennial included NRFU sampling; it was successfully used by Great Britain in its most recent census.

c) Sampling for NRFU is more accurate and less expensive than repeated household calls attempting to achieve numerical accuracy (defined as counting every resident once and only once).

Major Arguments Against Considering NRFU Sampling.

a) It is unconstitutional. This is a matter of opinion not a legal fact. In its 1999 ruling against sampling for the 2000 census, the Supreme Court cited Title 13; it did not rule on whether sampling for apportionment was inconsistent with the term “enumeration” in the Constitution. In 2001, the Supreme Court ruled in favor of the Department of Commerce’s position that 1.1 million imputed cases should remain in the 2000 census, suggesting that the Court takes a properly broad view of the term enumeration.

b) It is illegal. This is correct. It would require an alteration of Title 13. This should occur only with strong bipartisan agreement. I realize that opening up Title 13 invites extraneous changes. The great risks facing the 2010 census can, hopefully, limit congressional action to the NRFU issue.

c) It is politically risky. It is argued that NRFU sampling opens the door for dual system estimation – an “adjusted census” – at some future time. It was dual system estimation that led your predecessor, Robert A. Mossbacher, to write: “I am deeply concerned, however, that adjustment would open the door to political tampering with the census in the future.” Though I believe this concern is groundless, Title 13 could be reworded to allow NRFU sampling only, and to preclude census adjustment.

d) It is undemocratic not to try to count every resident. Mailing the form to every household honors this principle. To reject sampling for non-response, however, is to accept the likelihood of a distributionally inaccurate census that is more undemocratic.

I appreciate that NRFU sampling will be viewed as an unrealistic option at this time. However, there are times when crisis conditions produce political courage that achieves “unrealistic” success.

If NRFU sampling is unrealistic, so also is the assumption that the immediately required emergency supplemental will cover difficulties the Bureau will face in '09 and '10. When those occur, a further supplemental will be needed, and the normal delays associated with a change in administration and/or a CR, heighten the risks of an already high-risk census.

I do not know if NRFU sampling is technically feasible in the current time-frame for census 2010. My recommendation is that you use Expert Panel members already in place to assess the technical feasibility of NRFU sampling for the 2010 census.