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October 29, 1999

The Honorable Dan Miller  
Chairman, Subcommittee on the Census  
Committee on Government Reform  
House of Representatives

Subject: Decennial Census: Answers to Hearing Questions on Census Address List

Dear Mr. Chairman:

This letter responds to your request for additional information following the Subcommittee's September 29<sup>th</sup> hearing on the Local Update of Census Addresses (LUCA) program's impact on the census address list. The enclosure contains our responses to questions we received from your Subcommittee dated October 13, 1999.

Because our responses are based primarily on our prior work, we did not obtain comments from the Department of Commerce on a draft of this letter. We are sending copies of this letter to the Honorable Carolyn Maloney, Ranking Minority Member, Subcommittee on the Census; the Honorable William M. Daley, Secretary of Commerce; and the Honorable Kenneth Prewitt, Director of the Bureau of the Census. We will make copies available to others upon request. If you have any questions concerning this letter, please contact me at (202) 512-8676.

Sincerely yours,

J. Christopher Mihm  
Associate Director, Federal Management  
and Workforce Issues

Enclosure

# Responses to Subcommittee Questions Following September 29, 1999, Census Address List Hearing

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**1. In your testimony you have stated that the Local Update of Census Addresses (LUCA) program is one of only two components of the Census Bureau's address list development program that gives local governments input into the Bureau's address lists. In your opinion, why is it important for local governments to have input into this process?**

We believe that local government participation in the development of the census address list is important to ensuring an accurate and complete address list—a cornerstone of a successful census. As you are aware, the address list sent to local governments for review was compiled from the Bureau's 1990 address list and the U.S. Postal Service's mail delivery sequence file. The Bureau determined that the mail delivery sequence file was not uniformly kept up to date by post offices around the country. While Bureau block canvassing was seen as a means to correct this problem, this operation also has inherent limitations in finding missing addresses. According to Bureau officials, local government officials may have a greater potential for identifying some housing units that are hard to find or are hidden, simply because of their knowledge and access to local data. For example, local governments may have alternate sources of address information, such as utility bills, information from housing or zoning officials, or 911 emergency services, that can help the Census Bureau build an accurate and complete address list.

In addition, providing local governments with opportunities to actively participate in the development of the address list can have an added benefit for the Bureau in building local governments' understanding of and support for the census. Local governments have key roles in ensuring a successful census, not just in developing the address list but during subsequent census operations as well; especially those designed to boost public participation.<sup>1</sup> Local participation in the development of the address list thus underscores the fact that the decennial census is a shared national undertaking and that the active involvement of local governments is critical to the census' success.

**2. If I understand the way this process works, errors in the address list are “found” by participating local governments during the LUCA '98 program, and corrected by the Census Bureau and later added to the Master Address File (MAF). Can you tell us what options does a local government have if these corrections are missed by the Census Bureau and not accurately incorporated into Census 2000?**

According to Bureau officials, the Bureau is field-verifying all address changes recommended by local governments, including additions, corrections, and deletions that were not confirmed by the Bureau's block canvassing effort. However, Bureau officials said that this field verification was not completed before last summer when the Bureau had to deliver the 2000

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<sup>1</sup> Expanding the Role of Local Governments: An Important Element of Census Reform (GAO/T-GGD-91-46, June 15, 1991).

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Census address list used to print and mail census questionnaires to its vendors. In order to try to develop as complete a mailing list as possible, the Bureau decided to include in the vendor-provided address list those address changes that block canvassing had not confirmed and field verification had yet to check. These address changes include, for example, about 2.2 million suggested additions from local governments. Thus, irrespective of the results of the field-verification efforts, those addresses will be sent census questionnaires because they already are included on the address file that was provided to the vendors. Any households at those addresses will be given the opportunity to be included in the census.

However, the Bureau will not necessarily follow up at these addresses if a questionnaire is not mailed back to the Bureau. The Bureau is providing feedback to the local governments on the results of its reviews of the address list changes suggested by local governments as part of LUCA. Should a local government disagree with the Bureau's final determination about whether to accept or reject a suggested address change, the local government can appeal the Bureau's decision to the Census Address List Appeals Office—an independent office established by the Office of Management and Budget. According to Bureau officials, in cases where the Bureau rejected an address and the address was not reinstated on appeal, the Bureau will not follow up if a questionnaire is not returned. For addresses that were appealed and reinstated by the appeals office, the Bureau will send a census enumerator to follow up when a census questionnaire is not returned, as is consistent with the Bureau's normal follow-up procedures.

**3. According to the Census Bureau, there are an estimated 39,000 local governmental units in the United States. In your testimony, you have stated that there were 16,675 jurisdictions eligible for LUCA '98 activities. Were you able to ascertain what percentage of the U.S. population this figure represents? What percentage of the total addresses in the United States does this figure represent?**

We were unable to determine the percentage of the U.S. population residing in jurisdictions eligible to participate in LUCA '98. However, according to Bureau officials, about 80 percent of the nation's addresses are considered "city-style" and thus would be the types of addresses that could have been reviewed by the 16,675 jurisdictions during LUCA '98.

**4. In your testimony, you suggest that only 40 percent of eligible local governments have actively participated in the LUCA '98 program. Could you explain again how you got to this number, and why it is different from the number that Director Prewitt has used in his sworn testimony?**

According to the Bureau, about 53 percent of the local governments (8,779 out of the 16,675) eligible for LUCA '98 signed confidentiality agreements and were shipped materials for review—which became the criteria on which the Bureau based its calculation of the participation rate. We attempted in our analysis to focus on a more direct indicator of the

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extent to which local governments may have actually reviewed address material. Thus, we focused on the number of local governments that provided the Bureau with input to its address list. As detailed in our testimony statement, of the 8,779 local governments that signed confidentiality agreements and were shipped material for review, 6,673 provided input to the Bureau.<sup>2</sup> That is, they returned annotated or unannotated material to the Bureau. These 6,673 local governments that provided input represent about 40 percent of the 16,675 local governments eligible to participate in LUCA '98.

**5. Based on GAO's preliminary findings from the participation of local governments in the LUCA '98 program, can you illustrate GAO's level of confidence of the accuracy of the MAF to date? By your estimation, if there are 7 million suggested changes in addresses for 40 percent of the eligible jurisdictions, could there be millions more?**

As noted during our testimony, it is not possible to estimate the level of accuracy of the MAF at this time. The accuracy of the address list ultimately will not be known until after the 2000 Census has been conducted and when the Bureau evaluates the coverage of housing units in the MAF. However, the Bureau expects that the MAF for the 2000 Census will be at least as accurate as its address list was for the 1990 Census. Bureau evaluations after the 1990 Census estimated that in 1990 about 3.6 percent of the housing units were omitted entirely or were not accurately located, while about 2.8 percent of the housing units were erroneously included because they either did not exist or were duplicates.

Participating local governments recommended about 7.7 million changes as a result of LUCA '98. It is certainly possible that more changes could have been recommended had more than 40 percent of the eligible jurisdictions provided the Bureau with input. During our testimony, we indicated that about 2,300 of the jurisdictions that had populations greater than 10,000 in 1990 did not participate in LUCA '98 or LUCA '99. Thus, there were some large localities that did not participate. However, it is not possible to estimate how many additional changes, if any, would have been recommended had more local governments participated in LUCA and provided input to the Bureau.

**6. During the hearing, Members of the Subcommittee heard various concerns from witnesses that have experienced difficulties and were frustrated with errors in the materials that the Census Bureau provided to them for review. In GAO's findings, there seems to be a high percentage of local governments or participating jurisdictions that have expressed displeasure at the overall completeness and accuracy of LUCA '98 address lists and maps. Has this problem turned off many local**

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<sup>2</sup> 2000 Census: Local Address Review Program Has Had Mixed Results to Date (GAO/T-GGD-99-184, Sept. 29, 1999).

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**governments from participating in the program, and could it possibly introduce more errors in the MAF?**

We do not know whether problems in the accuracy or completeness of the Bureau's address lists or maps resulted in local governments declining to participate in the program. Our survey found that about 18 percent of local governments reported encountering problems with the accuracy or completeness of the addresses to a very great or great extent, while 16 percent reported encountering problems with the accuracy or completeness of the maps to a very great or great extent. Our survey did not seek to determine the extent to which problems with address lists or maps may have deterred local governments from providing input to the Bureau.

As we noted during discussion at the hearing, LUCA is undertaken precisely so that local governments can suggest improvements to the census address lists and maps. Thus, it is not surprising, nor is it necessarily a deficiency, that a number of local governments expressed concern about the accuracy and completeness of the Bureau's address list and maps. On the contrary, local government problems with the accuracy and completeness of census address lists and maps—and recommended changes to those lists and maps—are the fully intended outcome of LUCA.

Our work suggests that local resources are a major factor in determining the degree to which local governments participate in census address list development efforts. As noted in our statement, the availability of human resources to review LUCA materials appeared to be particularly problematic for many local governments that participated in LUCA '98. For example, over 40 percent of the local governments we surveyed rated the availability of human resources as less than they perceived necessary. Moreover, about 71 percent of our survey respondents reported that the LUCA workload was greater than they anticipated it would be.<sup>3</sup> These findings are reinforced by our 1990 survey of local governments that did not respond to an operation broadly similar to LUCA that was done for the 1990 Census. We estimated that 44 percent of the local governments that did not review the Bureau's housing unit counts for the 1990 Census lacked funds, expertise, or staff to carry out the program.<sup>4</sup>

**7. You state in your testimony that out of the 5.4 million suggested additions to the address file, the Census Bureau has accepted about 2.7 million of these addresses. The Subcommittee is concerned about those remaining 2.2 million addresses. Based**

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<sup>3</sup> Specifically, about 44 percent responded that the human resources to conduct LUCA were not at all sufficient or only sufficient to a small extent, and 71 percent responded that the workload was much or somewhat more than they had expected.

<sup>4</sup> See *Decennial Census: Status of Housing Coverage Check and Postcensus Local Review Program* (GAO/T-GGD-90-63, Sept. 25, 1990) and GAO/T-GGD-91-46, June 15, 1991.

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**on past experiences with the Census Bureau, do you think that there is a possibility that time may run out and these addresses may go unchecked?**

According to a Bureau official, Bureau data indicate there is little possibility that time will run out. First, as we noted in response to question number 2, irrespective of the results of the Bureau's field verification efforts, these 2.2 million addresses will receive a census questionnaire, and people in any households at those addresses will therefore have the opportunity to respond and be included in the census. In addition, according to a Bureau official, Bureau data indicated that as of mid-October 1999, the Bureau's field verification of LUCA '99-recommended address changes was near completion, and feedback had been provided to a majority of those local governments. Field verification of the majority of LUCA '98-recommended address changes had also been completed, and the Bureau was preparing feedback reports for those local governments.

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