

**NATIONAL
STATE DATA CENTER
STEERING COMMITTEE**

Todd Graham (MN), *Chair*
Dan Veroff (WI), *Vice Chair*
Charles Rynerson (OR), *Co-Secretary*
Melissa Stefanini (TN), *Co-Secretary*

*Representing a Network of 1,800
State Data Centers and Affiliates Nationwide*

Allen Barnes (AZ)
Gregg Bell (AL)
Suzan Reagan (NM)
Pam Schenker (FL)
Jenn Shultz (PA)

We Bring Value-Added Census Data and Education to the User

September 20, 2017

Jennifer Jessup
Department of Commerce, Room 6616
14th and Constitution Avenue NW
Washington, DC 20230

Dear Ms. Jessup—

The Department of Commerce has issued a Notice and request for comments concerning the Participant Statistical Area Program (PSAP). (online: <https://www.federalregister.gov/d/2017-17033>)

I am writing on behalf of the Census State Data Centers (SDC) Steering Committee to offer our comments. The Census SDC network includes organizations from 56 states and territories that partner with the Census Bureau to provide training, technical assistance, and extension of Census products. The Steering Committee represents the interests of the participating organizations and coordinates the network's national activities with Census Bureau staff.

The Notice states that the Census Bureau will designate and work with "tribal governments, regional planning agencies, and councils of governments." Counties and municipalities may be invited to be PSAP participants in some cases. If none of these entities have "the resources to participate", state agencies may substitute as participants.

The Notice goes on to state: "From March 2018 through May 2018, Census Bureau staff will contact 2010 Census PSAP participants to solicit participation in the 2020 Census PSAP. During this time, Census Bureau staff will also research and identify contacts where the Census Bureau has no 2010 Census PSAP participant contact information." (82 FR 37839) In short, participation is by invitation. There is not an explicit process for partners of the Bureau to identify new participants.

Our Steering Committee requests that the Census Bureau provide State Data Centers a database or spatial data layer detailing where the Bureau expects to need new 2020 participants and/or what parts of states did not have 2010 PSAP participants. This is a public information request; we expect that the requested data does not contain any protected personal identifying information.

Further, our Steering Committee recommends that State Data Centers (these are listed on the Census's website at <http://census.gov/sdc/>) have an opportunity (30 days) to nominate organizations as prepared and equipped to participate. In some places, where there are not regional planning agencies or COGs, a broader range of non-governmental organizations should be eligible. Nominations of potential participants would be non-binding; the official invitation of PSAP participants is a Census Bureau decision.

Finally, the present Notice does not address the definitions of Census County Divisions and Census Designated Places, tracts and block groups. Our Steering Committee endorses continued use of the 2010 cycle definitions and criteria for CCDs, CDPs, census tracts and block groups. (73 FR 7521, 73 FR 8269, 73 FR 13829, 73 FR 13836) Those criteria and definitions have proven appropriate for providing local data tabulations.

The Census SDC Steering Committee considers PSAP a valuable and necessary program for ensuring that local geographic summarizations of Census data will address local needs. Our network members are here to support the Census Bureau's work.

Thank you for your attention to our comments and our request. The information requested above can be transmitted to me at todd.graham@metc.state.mn.us, or by US mail: Todd Graham, Metropolitan Council, 390 North Robert Street, St. Paul, MN 55101.

Sincerely,

Todd Graham
Chairman, Census SDC Steering Committee

cc: Allen Barnes, Arizona Office of Economic Opportunity
Gregg Bell, University of Alabama
Suzan Reagan, Bureau of Business and Economic Research (New Mexico)
Charles Rynerson, Population Research Center (Oregon)
Pam Schenker, Florida Office of Economic and Demographic Research
Jenn Shultz, Pennsylvania State Data Center
Melissa Stefanini, Tennessee State Data Center
Dan Veroff, Applied Population Lab (Wisconsin)
Lakiva Pullins, Census Bureau, CLMSO