



# NATIONAL CONGRESS OF AMERICAN INDIANS

September 9, 2020

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## NCAI HEADQUARTERS

1516 P Street, N.W.  
Washington, DC 20005  
202.466.7767  
202.466.7797 fax  
www.ncai.org

Director Steven D. Dillingham  
Office of the Director  
U.S. Census Bureau  
United States Department of Commerce  
Washington, DC 20233-0001

Delivered via email to: [steven.dillingham@census.gov](mailto:steven.dillingham@census.gov);  
[Katherine.dodson.hancher@census.gov](mailto:Katherine.dodson.hancher@census.gov); [Dee.A.Alexander@census.gov](mailto:Dee.A.Alexander@census.gov)

Dear Director Dillingham:

It should come as no surprise that the National Congress of American Indians (NCAI) is disappointed about the abrupt decision to end enumeration for the 2020 Census on September 30, 2020, a full month before it was scheduled to end. We understand that this decision was taken to ensure that apportionment data will be available to the states by the end of the year.

The decision to rush the Census will result in critical inaccuracies in data concerning the nation's American Indian and Alaska Native population. Shortfalls in enumeration and the Census Bureau's application of the proposed Disclosure Avoidance System (DAS) compound together to create data that are completely fabricated and inaccurate, and cannot be used as a quality data source to represent the American Indian and Alaska Native populations. The cumulative adverse impacts of these two deficiencies cannot be ignored.

I write with great urgency to request that the Census Bureau immediately initiate tribal consultation on the DAS. We understand that the Data Stewardship Executive Policy Committee (DSEP) will be making some critical policy decisions later this month that will impact the accuracy and quality of the data in the 2020 Census for tribal nations. The U.S. Census Bureau has an obligation to consult with tribal nations on matters that will have significant impact on them. The decisions that will be made by the DSEP later this month have the potential to significantly impact the accuracy and quality of data about tribal nations in the 2020 Census.

The last tribal listening session hosted by the U.S. Census Bureau on May 15, 2020 focused mainly on enumeration updates, and there was little time for discussion about the DAS. We were disappointed to read in your response to our June 25, 2020 letter that tribal consultation was not planned until the end of 2020 or spring of 2021,

which would be well after the upcoming policy decisions of the DSEP. The U.S. Census Bureau communicated to us that tribal consultation might be held in either August or September 2020, but we recently learned that consultation is on hold due to the upcoming Census deadlines. However, the DSEP policy decisions later this month have not changed and have the potential to significantly impact tribal nations, since the decennial census data is used for critical funding decisions, reapportionment and representation, tribal local governance, and American Indian/Alaska Native research and surveillance. A recent analysis of the latest demonstration product release shows no improvement in American Indian/Alaska Native data and many tribal nations continue to show reduced or zero counts after DAS is applied, which is unacceptable.

We are happy to help with any logistics that are necessary to enable immediate tribal consultation on the DAS prior to the DSEP decisions so that tribal nations can hear an update on how the U.S. Census Bureau plans to ensure accurate and quality decennial census data for tribal nations and American Indians and Alaska Natives and can give final recommendations for the DSEP to consider.

Access to accurate data on the American Indian/Alaska Native population at all geographic levels is critical to tribal nations, and we ask that you respond as soon as possible to this letter. If you have any questions, please contact us at: [research@ncai.org](mailto:research@ncai.org).

Sincerely,



Kevin Allis  
Chief Executive Office  
National Congress of American Indians

CC: The Honorable Carolyn Maloney, U.S. House of Representatives  
The Honorable Jim Jordan, U.S. House of Representatives  
The Honorable Ron Johnson, U.S. Senate  
The Honorable Gary Peters, U.S. Senate  
Doug Hoelscher, Deputy Assistant to the President & Director, White House  
Office of Intergovernmental Affairs