

June 12, 2018

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BY ELECTRONIC MAIL AND ECF

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Re: *NAACP et al. v. Bureau of the Census et al.*, No. 8:18-Cv-00891-PWG

Dear Counsel:

We write on behalf of the Plaintiffs in the above-captioned case, pursuant to the Court's instructions during the May 8, 2018 telephone conference, and its May 10, 2018 Docket Order, to summarize the parties' positions and update the Court in advance of the June 13, 2018 telephone conference.

On May 25, 2018, Plaintiffs sent Defendants the attached letter making initial discovery requests in this action. *See* Exhibit A. In the letter, based on their investigation of public information to date, Plaintiffs presented targeted requests for relevant documents in Defendants' possession. Plaintiffs limited the requests to seven key categories, and within those categories, sought to provide sufficient detail to identify specific types of documents, or "documents sufficient to show" specific information. In the letter, Plaintiffs also advised of their intent to seek one or two depositions of a targeted nature, related to the same seven categories of documents, and requested a prompt meet-and-confer in order to discuss the requests.

On June 7, 2018, the parties conferred by telephone. Defendants objected to Plaintiffs' discovery requests in their entirety. Defendants stated their position that Plaintiffs are not entitled to any discovery prior to the resolution of Defendants' motion to dismiss. Defendants further claimed that Plaintiffs' requests were overbroad and/or covered by publicly available information. We asked Defendants to identify the publicly available information responsive to the requests and Defendants agreed to provide that information. We also offered to consider narrowing certain requests to facilitate prompt disclosure. On June 11, 2018, Defendants sent a PDF with links they claim to be responsive to the requests. *See* Exhibit B.

Plaintiffs disagree with all of Defendants' positions. As set forth in their April 26, 2018 Letter to the Court, Plaintiffs believe that, due to the exigencies of this action, they are entitled to limited discovery prior to the resolution of Defendants' motion. Moreover, Plaintiffs have undergone an exhaustive review of publicly available information, including virtually all of the information sent by Defendants in Exhibit B. Plaintiffs are seeking key *internal* documents in

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Defendants' possession, which are not included in any of the publicly available links provided by Defendants, as well as the opportunity to inquire about additional relevant records and test the comprehensiveness of the government's public disclosures through one or two depositions. There is good cause to believe that there are additional non-privileged agency records relevant to the seven categories of initial discovery sought by Plaintiffs. *See* Liz Robbins and Kate Benner, *Documents Show Political Lobbying in Census Question About Citizenship*, N.Y. Times (June 9, 2018) (reporting on 1,332 pages of records "released by the Justice Department late Friday night in response to a federal lawsuit from the attorneys general of 18 states," including records regarding internal agency scientific analysis and cost estimates of adding citizenship question). Finally, Plaintiffs' initial requests are narrowly targeted, but we also reiterate our willingness to consider narrowing certain requests to facilitate timely disclosure, as set forth below.

A. Plaintiffs are entitled to discovery during the pendency of the motion to dismiss.

As described in the April 26, 2018 Letter, Plaintiffs' Complaint alleges a constitutional violation based on Defendants' deficient plans and preparations for the 2020 Census, preparations which are taking place right now and over the next year and a half. *See* Compl. ¶¶ 119-24. Without allowing Plaintiffs to obtain the very targeted discovery sought, and forcing Plaintiffs to await resolution of a motion to dismiss, Plaintiffs' constitutional claims will be lost as the timeline for starting the 2020 Census draws to a close. The inherently urgent timeline of this case presents the sort of "unusual circumstances or conditions which would be likely to prejudice the plaintiff if he were compelled to await for the required period" of post-motion-to-dismiss discovery. Grimm, Fax, & Charles, *Discovery Problems and Their Solutions*, 27 (2nd ed. 2009); *see also AT&T Mobility LLC v. Miranda Holdings Corp.*, 2008 WL 2139519, at *2 (S.D. Fla. May 7, 2008) (finding "good cause" to expedited discovery in order to "afford the injured party relief promptly" and avoid "the more time-consuming . . . preliminary injunction hearing").

Plaintiffs can readily establish the good cause required for expedited discovery, and have sought to present targeted requests for this initial stage of discovery. Plaintiffs are willing to work with Defendants to narrow certain requests further, but cannot wait several more months before beginning discovery.

B. Defendants cannot resist production because certain documents are publicly available.

Plaintiffs note initially that, as a legal matter, Defendants generally cannot resist all disclosure obligations by gesturing to information they have released that is not fully responsive to Plaintiffs' requests. "Courts have generally held such an objection insufficient to resist a discovery request." *Jackson v. W. Virginia Univ. Hosps., Inc.*, No. 1:10CV107, 2011 WL 1831591, at *2 (N.D.W. Va. May 12, 2011). And even to the extent Defendants' production would include some public information, "[r]equiring production of [public records] is not unduly burdensome." *N. Carolina State Conference of the NAACP v. McCrory*, No. 1:13CV658, 2014 WL 12526713, at *3 (M.D.N.C. Mar. 27, 2014).

Moreover, Plaintiffs have already reviewed the public record in the course of preparing and litigating this case, including virtually all of the material linked in Exhibit B, as well as the

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few records disclosed by the Census Bureau in response to a separate Freedom of Information Act lawsuit filed last fall by Plaintiff NAACP. *See NAACP v. U.S. Dept. of Commerce*, No. 3:17-cv-1682-WWE (D. Conn.). Plaintiffs seek responsive internal documents, correspondence, and memoranda that are not included amongst the documents referenced in those links.

Plaintiffs note that Defendants have produced a wealth of documents including internal memoranda and communications as an administrative record in a related case in the Southern District of New York. *See* ECF 173, No. 1:18-cv-2921 (JMF). Although that administrative record deals with a separate issue—the inclusion of the citizenship question—and Plaintiffs do not seek nearly that volume here, it is clear that Defendants have relevant internal documents outside the public record.

C. Plaintiffs seek targeted discovery within seven key categories.

Plaintiffs believe that they have set forth seven categories that are indisputably relevant to this case. Within each of these categories, Plaintiffs are not seeking a full electronic search and production, but rather the production of specific documents or documents sufficient to show certain information.

The links provided by Defendants in Exhibit B reference various reports released by Defendant Census Bureau on its website, including public one-page memoranda, brief PowerPoint presentations, and operational reports. Overall, much of the information is generalized and aspirational, and does not include internal documents for most of the specific topics we identified below, which bear directly on the constitutional sufficiency of Defendants' preparations for the 2020 Census. One or two depositions would also likely facilitate an understanding of agency record-keeping systems that would allow Plaintiffs to calibrate their requests even more precisely. We set forth more specific missing areas for each category below.

Plaintiffs set forth their positions below for each category.

1) Historical Benchmarks: A central claim in this case is that Defendants' reduced levels of funding, staff, and census offices, among others, will lead to a significant undercount in communities of color. Compl. ¶¶ 28-30. Benchmark comparisons between the 2010 and 2020 Census is a targeted manner of testing that theory. The information referenced by Defendants may provide individual components of some numbers requested by Plaintiffs, but does not show the historical comparisons and or documents showing the justification for reductions. This request goes to the heart of the case and Defendants' current census preparations, and is sufficiently targeted. If Defendants have burdensomeness concerns for any particular categories, they may lay out those concerns for Plaintiffs.

2) Online Response Initiative: Documents concerning the Defendants first-ever online responsive initiative are also central to this case, given Plaintiffs' allegations that an online response plan will disadvantage Hard-to-Count Communities and that under-preparation and under-testing of the online census will lead to an undercount. Compl. ¶¶ 68-80. The public information referenced for this category, particularly as it relates to Hard-to-Count Communities, is generalized and published almost two years ago. Plaintiffs are willing to

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narrow their requests to more recent internal documents regarding the effect of the online response initiative on Hard-to-Count Communities, particularly requests 2(a) and 2(c).

3) Hard-to-Count Communities: Plaintiffs' allegation that Defendants' actions will inevitably lead to a particularly significant undercount of Hard-to-Count communities—including Plaintiff Prince George's County and many other communities of color—is central to this case. Compl. ¶¶ 106-17. Defendants' referenced links for this category are mostly generalized information, referencing, for example, a "memoranda series" but not specific memoranda responsive to the request.¹ Defendants should be able to produce responsive internal documents on this key topic.

4) Administrative Records: Another key concern for Plaintiffs is Defendants' plans to use potentially unreliable administrative data in order to fill gaps for non-responding Hard-to-Count communities. Compl. ¶¶ 89-93. Plaintiffs are willing to compromise and limit this request to 4(b) internal documents or memoranda showing *which* types of administrative records would be used, and 4(d) an example of an agreement regarding the sharing of administrative data with a state government.

5) 2018 End-to-End Testing: Defendants' decisions to cancel most of the planned 2017 field tests and 2018 End-to-End Tests are a particularly significant aspect of their deficient preparations. Compl. ¶¶ 44-45. The public documents identified in Exhibit B do not address Plaintiffs' requests in this category. In particular, they appear only to offer a January 2018 update on the Rhode Island End-to-End test. As a narrowed request, Defendants should produce internal documents sufficient to show the reasons for their 2018 test cancellations, and more recent internal updates regarding any challenges or deficiencies presented by the Rhode Island test.

6) 2020 Census Funding Documents: In their Complaint, Plaintiffs describe the severe drop in funding for the 2020 Census, and its effect to date. Compl. ¶¶ 29-30, 32-49. Although the 2018 Omnibus Bill appropriated additional money for the 2020 Census, there have been questions raised about how that money will be allocated. And as Exhibit B shows, there is limited public information on this topic. Plaintiffs are willing to limit these requests to (6)(a)-(c), which they believe to be sufficiently targeted; for example, (6)(b) simply requests an updated "spend plan" for FY2017 and 2018.

7) Immigration Enforcement: Plaintiffs' request in this category is limited to one question, and it is an essential one for community outreach in immigrant communities like Plaintiff Prince George's County. The links provided by Defendants do not appear responsive to this request, and Plaintiffs believe it is sufficiently targeted and not burdensome.

¹ We have already reviewed the 2016 and 2017 memoranda and they contain little if anything that is responsive to this category. One of the few responsive documents referenced, in Memorandum 2016.17, sets goals for the Integrated Partnership and Communications Operation as of September 2016. Plaintiffs are not aware of any more recent documents showing progress on those goals, which could be a limited set of documents Defendants produce in this initial round of discovery.

Plaintiffs look forward to addressing these issues in the June 13 conference with the Court. In the meantime, if you wish to discuss these further narrowed requests, please let us know promptly.

Best regards,

/s/Susan J. Kohlmann
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Exhibit A

May 25, 2018

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Re: *NAACP et al. v. Bureau of the Census et al.*, No. 8:18-Cv-00891-PWG

Dear Counsel:

We write pursuant to the Court's instructions during the May 8, 2018 telephone conference, and its May 10, 2018 Docket Order, in order to identify the targeted discovery we are seeking as an initial matter in this case. Our requests are separated into categories relevant to this case below. These requests are narrowly tailored to seek documents available within each category, and as such do not prejudice our ability to seek additional documents within those categories at a later time. In addition, we intend to seek one or two depositions as part of this initial discovery. The depositions will be of a targeted nature, related to the categories described herein.

- 1) Documents pertaining to key historical benchmarks:** Information sufficient to show Defendants' progress in key areas compared to the 2010 Census. In each of the following areas, Plaintiffs request **(i)** the current number for the 2020 Census, **(ii)** the planned total number for the 2020 Census, **(iii)** the number for the 2010 Census at a similar point in time (i.e. around June 1, 2008), **(iv)** the final number for the 2010 Census; **(v)** documents sufficient to show the justification for any reduction from 2010 to 2020; and **(vi)** related qualitative information for each category.
- a. Area Census Offices, Regional Census Offices, Regional Census Centers, and Questionnaire Assistance Centers that Defendants have opened and intend to open;
 - b. Census Bureau Employees that Defendants have hired and intend to hire, separated by position type¹;
 - c. Foreign-language-fluent census workers, formerly incarcerated census workers, and racial and ethnic minority census workers that Defendants have hired and intend to hire;

¹ These positions may include, among others, census employees that will be hired for all field operations, in-office data collection activities (such as Census Questionnaire Assistance), address canvassing, and supporting administrative work (such as Area Census Office managers and staff) in 2020.

- d. The amount of money that Defendants have spent and intend to spend on the Integrated Partnership and Communications Campaign;
- e. Partnership Specialists, Partnership Assistants, and Cultural Facilitators that Defendants have hired and intend to hire;
- f. The amount of money that Defendants have spent and intend to spend on the Partnership Program;
- g. The amount of money that Defendants have spent and intend to spend on testing from 2016 through 2018.
- h. All 2020 Census official “partners,” including state and local governments, non-profit, for-profit, and philanthropic organizations that Defendants have engaged and intend to engage.

2) Documents pertaining to the 2020 Census online response initiative : Documents related to Defendants’ preparations for the planned use of online response forms for the 2020 Census, including, in particular:

- a. Defendants’ plans for which locations they will be using the “Internet Choice” method versus the locations in which they will use the “Internet First” method;²
- b. Memoranda or other documents sufficient to show internal estimates for any changes in funding and response projections as a result of the conversion to online response forms for the 2020 Census;
- c. Documents sufficient to show the projected differential online response rate for rural communities, low-income communities, and communities of color.
- d. Memoranda or other documents sufficient to show the extent of usability testing and testing of the online interface for the online response initiative that has been completed to date;
- e. Memoranda or other documents sufficient to show Defendants’ plans to address confidentiality and data security concerns arising from the digitization of the Census.

3) Documents pertaining to Hard-to-Count Communities³: Documents related to Defendants’ approach and efforts to address the challenges posed by Hard-to-Count Communities, including, in particular:

- a. Memoranda or internal documents sufficient to show Defendants’ plans for outreach in Hard-to-Count Communities, including, among other things, partnership activities, the hiring of ethnic and racial minority canvassers, and targeted advertising;
- b. Documents or maps showing Defendants’ identification of Hard-to-Count communities in the United States;

² Plaintiffs understand the areas using the “Internet First” method to be defined as those in which Defendants will be first sending households a postcard or other mailing inviting them to fill out the census over the internet, and the areas using the “Internet Choice” method to be defined as those in which Defendants send paper questionnaires first due to anticipated internet response problems.

³ Plaintiffs define “Hard-to-Count Communities” as used by the Census Bureau, meaning communities with historically relatively low self-response rates, in which households “may not have submitted their census questionnaire for various reasons, such as having language difficulties, concerns about trust in government, or otherwise.” HTC 2020, www.censushardtocomcountmaps2020.us/#info-about.

- c. Memoranda or internal documents sufficient to show Defendants' plans for the 2020 Census online response initiative as it relates to Hard-to-Count Communities, including, among other things, communications strategies and partnership activities.
 - d. Memoranda or other documents sufficient to show any deficiencies, obstacles, or challenges identified with respect to Hard-to-Count communities in the 2016 or 2017 Census Tests.
- 4) **Documents pertaining to Defendants' use of administrative records:** Documents related to Defendants' plans to use administrative records to fill gaps created by non-responses to the 2020 Census including, in particular:
 - a. Memoranda or other documents sufficient to show Defendants' plans for when administrative records will be used;
 - b. A list of the types of administrative records that will be used (e.g. Internal Revenue Service records or Medicaid records), and the circumstances in which each type will be used;
 - c. The number of state and local governments with which Defendants have entered into agreements regarding the sharing of administrative data;
 - d. A representative example of such an agreement.
- 5) **Documents pertaining to the 2018 End-to-End Testing:** Documents related to the End-to-End Testing in 2018, including, in particular:
 - a. Memoranda or other documents related to Defendants' decision to cancel peak operations for two 2018 End-to-End Tests in Bluefield-Beckley-Oak Hill, West Virginia and Pierce County, Washington;
 - b. Memoranda or other documents sufficient to show challenges, obstacles, or deficiencies identified as a result of the Rhode Island End-to-End Test;
 - c. Memoranda or other documents sufficient to show Defendants' plans to address any challenges, obstacles, or deficiencies identified as a result of the Rhode Island End-to-End Test.
- 6) **Documents pertaining to the funding of the 2020 Census:** Documents related to the funding of the 2020 Census, including, in particular:
 - a. Memoranda or other documents sufficient to show Defendants' plans to address any funding shortfalls relative to the 2010 Census preparations to date;
 - b. Any and all updates or revisions to the 2020 Census "spend plan" for Fiscal Years 2017 and 2018;
 - c. Documents sufficient to show the spend plans for the funding directed towards the 2020 Census in the 2018 Omnibus Bill⁴ and any future funding to be appropriated by Congress for the 2020 Census;
 - d. Documents sufficient to show any agreements to date between the Office of Management and Budget and the Commerce Department regarding the funding of the 2020 Census.

⁴ Pub. L. 115-141.

- 7) **Documents pertaining to the overlap between immigration enforcement and the 2020 Census:** Documents or information sufficient to show any agreements or correspondence that would ensure that the Department of Homeland Security (“DHS”), Immigration and Customs Enforcement (“ICE”), and/or any other related agencies will not interfere with or adversely affect a thorough 2020 Census.

In order to report to the Court in advance of the June 13, 2018 telephone conference, we would like to confer with you regarding these requests promptly. Please let us know when you can speak with us about these requests.

Best regards,



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Exhibit B

Request Number	Sub-request Number	Publicly-available Links
1) Documents pertaining to key historical benchmarks	a. Area Census Offices, Regional Census Offices, Regional Census Centers, and Questionnaire Assistance Centers that Defendants have opened and intend to open	https://www.census.gov/programs-surveys/decennial-census/2020-census/planning-management/program-briefings/2018-04-20-pmr.html https://www.census.gov/programs-surveys/decennial-census/2020-census/planning-management/program-briefings/2017-10-27-pmr.html https://www.census.gov/programs-surveys/decennial-census/2020-census/planning-management/program-briefings/2017-10-27-pmr.html https://www.census.gov/programs-surveys/decennial-census/2020-census/planning-management/program-briefings/2017-10-27-pmr.html
1) Documents pertaining to key historical benchmarks	b. Census Bureau Employees that Defendants have hired and intend to hire, separated by position type	https://www.census.gov/content/dam/Census/library/publications/2011/dec/2010_cpex_155.pdf https://www.usajobs.gov/Search/?k=Decennial%20Census%20
1) Documents pertaining to key historical benchmarks	c. Foreign-language-fluent census workers, formerly incarcerated census workers, and racial and ethnic minority census workers that Defendants have hired and intend to hire	https://www.census.gov/programs-surveys/decennial-census/2020-census/planning-management/program-briefings/2018-01-26-pmr.html https://www2.census.gov/cac/nac/meetings/2017-11/2018-05-01-census-response.pdf https://www2.census.gov/cac/nac/meetings/2017-11/2018-05-01-census-response.pdf

Request Number	Sub-request Number	Publicly-available Links
		https://www.census.gov/programs-surveys/decennial-census/2020-census/planning-management/planning-docs/LNG-detailed-op-plan.html https://www.census.gov/programs-surveys/decennial-census/2020-census/planning-management/program-briefings/2017-04-21-pmr.html
1) Documents pertaining to key historical benchmarks	d. The amount of money that Defendants have spent and intend to spend on the Integrated Partnership and Communications Campaign	https://www.c-span.org/video/?435644-1/commerce-secretary-wilbur-ross-testifies-2020-census-costs https://www2.census.gov/programs-surveys/decennial/2020/program-management/planning-docs/2020-cost-estimate1.pdf https://www2.census.gov/programs-surveys/decennial/2010/program-management/1-plan/advertising_budget.pdf https://www.census.gov/2010census/pdf/2010_Census_ICP_Summary_Assessment.pdf https://www.census.gov/programs-surveys/decennial-census/2020-census/planning-management/program-briefings/01292016.html https://www2.census.gov/census_2020/pmr_materials/2016-01-29/7%20Integrated%20Partnership%20and%20Communications%20Contract.pdf
1) Documents pertaining to key historical benchmarks	e. Partnership Specialists, Partnership Assistants, and Cultural Facilitators that	https://www.census.gov/about/census-careers/opportunities/positions/region-field/partnership-specialist.html

Request Number	Sub-request Number	Publicly-available Links
	Defendants have hired and intend to hire	https://www2.census.gov/census_2020/pmr_materials/2016-01-29/5%20Tribal%20Consultations.pdf https://www.census.gov/programs-surveys/decennial-census/2020-census/planning-management/planning-docs/integrated_com_plan.html
1) Documents pertaining to key historical benchmarks	f. The amount of money that Defendants have spent and intend to spend on the Partnership Program	https://www2.census.gov/programs-surveys/decennial/2020/program-management/planning-docs/2020-cost-estimate1.pdf https://www.census.gov/2010census/pdf/2010_Census_ICP_Summary_Assessment.pdf https://www.census.gov/programs-surveys/decennial-census/2020-census/planning-management/planning-docs/integrated_com_plan.html
1) Documents pertaining to key historical benchmarks	g. The amount of money that Defendants have spent and intend to spend on testing from 2016 through 2018	https://www2.census.gov/programs-surveys/decennial/2020/program-management/planning-docs/2020-cost-estimate1.pdf http://www.osec.doc.gov/bmi/budget/FY16CJ/Census_2016_CJ.pdf http://www.osec.doc.gov/bmi/budget/FY17CBJ/Census%20FY%202017%20CBJ%20final%20not508.pdf http://www.osec.doc.gov/bmi/budget/FY18CBJ/Census_FY_2018_Congressional_Budget_Submission_508_Compliant.pdf
1) Documents pertaining to key historical benchmarks	h. All 2020 Census official “partners,” including state and local governments, non-profit,	https://www.c-span.org/video/?c4685916/2020-census-trey-gowdy-secretary-wilbur-ross-congressional-hearing-10-12-2017

Request Number	Sub-request Number	Publically-available Links
	for-profit, and philanthropic organizations that Defendants have engaged and intend to engage	https://www.census.gov/2010census/pdf/2010_Census_Evaluation_Partnership_Research.pdf https://www.census.gov/2010census/pdf/2010_Census_Evaluation_Partnership_Research.pdf https://www.census.gov/programs-surveys/decennial-census/2020-census/planning-management/program-briefings/2018-04-20-pmr.html https://www.census.gov/programs-surveys/decennial-census/2020-census/planning-management/program-briefings/2017-10-27-pmr.html https://www.census.gov/partners/2020.html https://www.census.gov/programs-surveys/decennial-census/2020-census/planning-management/planning-docs/IPC-detailed-op-plan.html https://www.census.gov/programs-surveys/decennial-census/2020-census/planning-management/planning-docs/integrated_com_plan.html https://www.census.gov/content/dam/Census/newsroom/press-kits/2018/sccc.pdf https://census.gov/content/dam/Census/newsroom/press-kits/2018/ccc.pdf https://www.census.gov/programs-surveys/decennial-census/about/psap.html

Request Number	Sub-request Number	Publicly-available Links
		https://www.census.gov/programs-surveys/decennial-census/about/luca.html https://www.census.gov/geo/maps-data/data/partnership.html https://www.census.gov/programs-surveys/bas.html
2) Documents pertaining to the 2020 Census online response initiative	a. Defendants' plans for which locations they will be using the "Internet Choice" method versus the locations in which they will use the "Internet First" method	https://www2.census.gov/cac/nac/meetings/2017-11/2018-05-01-census-response.pdf
2) Documents pertaining to the 2020 Census online response initiative	b. Memoranda or other documents sufficient to show internal estimates for any changes in funding and response projections as a result of the conversion to online response forms for the 2020 Census	https://www2.census.gov/programs-surveys/decennial/2020/program-management/planning-docs/2020-cost-estimate1.pdf
2) Documents pertaining to the 2020 Census online response initiative	c. Documents sufficient to show the projected differential online response rate for rural communities, low-income communities, and communities of color	https://www.census.gov/content/dam/Census/library/publications/2017/acs/acs-37.pdf https://www.census.gov/topics/population/computer-internet.html
2) Documents pertaining to the 2020 Census online response initiative	d. Memoranda or other documents sufficient to show the extent of usability testing and testing of the online interface for the	https://www.census.gov/2018censustest https://www.census.gov/2017censustest

Request Number	Sub-request Number	Publicly-available Links
	online response initiative that has been completed to date	https://www.census.gov/programs-surveys/decennial-census/2020-census/research-testing/self-response.html https://www.census.gov/srd/papers/pdf/ssm2015-04.pdf https://www.census.gov/content/dam/Census/newsroom/press-kits/2018/aapor/aapor-presentation-usability-testing.pdf https://www2.census.gov/programs-surveys/decennial/2020/program-management/planning-docs/2020-oper-plan3.pdf
2) Documents pertaining to the 2020 Census online response initiative	e. Memoranda or other documents sufficient to show Defendants' plans to address confidentiality and data security concerns arising from the digitization of the Census	https://www.census.gov/programs-surveys/decennial-census/2020-census/planning-management/program-briefings/2018-04-20-pmr.html https://www.census.gov/programs-surveys/decennial-census/2020-census/planning-management/planning-docs/SPC-detailed-op-plan.html https://www2.census.gov/cac/nac/meetings/2017-11/Meyers-NAC-Confidentiality-Presentation.pdf https://www2.census.gov/programs-surveys/decennial/2020/program-management/planning-docs/2020-oper-plan3.pdf
3) Documents pertaining to Hard-to-Count Communities	a. Memoranda or internal documents sufficient to show Defendants' plans for outreach in Hard-to-Count Communities, including, among other things, partnership activities, the hiring of ethnic and racial minority	https://www.census.gov/programs-surveys/decennial-census/2020-census/planning-management/memo-series.2017.html https://www.census.gov/programs-surveys/decennial-census/2020-census/planning-management/memo-series.2016.html

Request Number	Sub-request Number	Publicly-available Links
	canvassers, and targeted advertising	https://www.census.gov/content/dam/Census/library/working-papers/2014/demo/2014-undercount-children.pdf https://census.gov/roam https://www.census.gov/research/data/planning_database/ https://www2.census.gov/cac/nac/reports/2016-11-ipc-wg-recommendations.pdf https://www.census.gov/library/visualizations/interactive/engagement.html https://www.census.gov/partners/toolkits.html https://www.census.gov/programs-surveys/decennial-census/2020-census/planning-management/planning-docs/GQ-detailed-op-plan.html https://www2.census.gov/programs-surveys/decennial/2020/program-management/pmr-materials/07-11-2017/pmr-2020-operations-07-11-2017.pdf https://www.census.gov/programs-surveys/decennial-census/2020-census/planning-management/planning-docs/integrated_com_plan.html
3) Documents pertaining to Hard-to-Count Communities	b. Documents or maps showing Defendants' identification of Hard-to-Count communities in the United States	https://gis-portal.data.census.gov/arcgis/apps/webappviewer/index.html?id=6478c965507c442c83a07d73b49dc54e

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3) Documents pertaining to Hard-to-Count Communities	c. Memoranda or internal documents sufficient to show Defendants' plans for the 2020 Census online response initiative as it relates to Hard-to-Count Communities, including, among other things, communications strategies and partnership activities	https://www2.census.gov/programs-surveys/decennial/2020/program-management/pmr-materials/04-20-2018/pmr-2020-operations-04-20-2018.pdf https://www2.census.gov/cac/nac/reports/2016-07-admin_internet-wg-report.pdf
3) Documents pertaining to Hard-to-Count Communities	d. Memoranda or other documents sufficient to show any deficiencies, obstacles, or challenges identified with respect to Hard-to-Count communities in the 2016 or 2017 Census Tests	https://www.census.gov/2010census/pdf/2010_Census_BC-QAC_Assessment.pdf https://www.census.gov/content/dam/Census/programs-surveys/decennial/2020-census/PMR072216/2016censustest_PMR072216.pdf https://www.census.gov/programs-surveys/decennial-census/2020-census/planning-management/memo-series/2020-memo-2016_21.html
4) Documents pertaining to Defendants' use of administrative records		https://www.census.gov/about/cac/sac/meetings/2018-03-meeting.html https://www.census.gov/about/cac/nac/meetings/2017-11-meeting.html https://www.census.gov/about/cac/sac/meetings/2017-09-meeting.html https://www.census.gov/about/cac/sac/meetings/2017-03-meeting.html

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		https://www2.census.gov/programs-surveys/decennial/2020/program-management/final-analysis-reports/2020-analysis-2014-census-test-ad-rec.pdf https://www.census.gov/2010census/pdf/2010_census_administrative_records_use_for_coverage_problems_evaluation_report.pdf https://www.census.gov/about/cac/sac/wg-admin-3rd-party-data-use.html https://www.census.gov/content/dam/Census/about/about-the-bureau/adrm/data-linkage/Data%20Acquisitions%20Frequently%20Asked%20Questions.pdf https://www.census.gov/content/dam/Census/library/working-papers/2014/adrm/carra-wp-2014-14.pdf https://www2.census.gov/foia/ds_policies/ds001_appendices.pdf https://www2.census.gov/programs-surveys/decennial/2020/program-management/planning-docs/2020-oper-plan3.pdf ftp://ftp2.census.gov/census_2020/pmr_materials/2013-06-21/5_PMR_Administrative_Records_Modeling_v1-0_final.pdf https://www2.census.gov/census_2020/pmr_materials/2013-09-24/04_PMR_2014_Site_Test_(NRFU)_9_24_13_v2-0_Final.pdf https://www2.census.gov/census_2020/pmr_materials/2013-12-20/Agenda_Topic_2_PMR_Early_Findings_from_the_2013_Census_Test_12_20_13_v1-0_Final.pdf

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		https://www2.census.gov/census_2020/pmr_materials/2014-03-28/4_PMR_Nonresponse_and_Admin_Records_Research_3-28-14_v1-0.pdf https://www2.census.gov/census_2020/pmr_materials/2014-06-06/04_PMR_2015_Nonresponse_Followup_Testing_Activities_6-6-14_v1-0.pdf https://www2.census.gov/census_2020/pmr_materials/2015-07-10/7%20PMR_2015%20Census%20Test%20--%20Preliminary%20Findings_7-10-15%20V1.0%20Final.pdf https://www2.census.gov/programs-surveys/decennial/2020/program-management/pmr-materials/04-21-2017/pmr-update-testing-2017-04-21.pdf https://www2.census.gov/programs-surveys/decennial/2020/program-management/pmr-materials/10-27-2017/pmr-update-testing-10-27-2017.pdf https://www.urban.org/research/publication/administrative-records-2020-us-census/view/full_report http://ww2.amstat.org/sections/srms/proceedings/y2016/files/389544.pdf http://ww2.amstat.org/sections/srms/proceedings/y2015/files/234091.pdf http://ww2.amstat.org/sections/srms/proceedings/y2014/Files/311864_88281.pdf

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		<p>http://ww2.amstat.org/sections/srms/proceedings/y2014/Files/313148_90659.pdf</p> <p>https://content.sciendo.com/view/journals/jos/33/2/article-p455.xml</p> <p>https://content.iospress.com/download/statistical-journal-of-the-iaos/sji1009?id=statistical-journal-of-the-iaos%2Fsji1009&utm_source=MadMimi&utm_medium=email&utm_content=New+Content+added%3A+Issue+32%3A2+Statistical+Journal+of+the+IAOS+online&utm_campaign=20160527_m131742058_First+news+release+June+issue+SJI+-+IAOS%2FISI&utm_term=Imputation+research+for+the+2020+Census_2A</p> <p>https://content.iospress.com/download/statistical-journal-of-the-iaos/sji1007?id=statistical-journal-of-the-iaos%2Fsji1007&utm_source=MadMimi&utm_medium=email&utm_content=New+Content+added%3A+Issue+32%3A2+Statistical+Journal+of+the+IAOS+online&utm_campaign=20160527_m131742058_First+news+release+June+issue+SJI+-+IAOS%2FISI&utm_term=Adaptive+design+research+for+the+2020+Census_2A</p> <p>https://content.iospress.com/download/statistical-journal-of-the-iaos/sji1002?id=statistical-journal-of-the-iaos%2Fsji1002&utm_source=MadMimi&utm_medium=email&utm_content=New+Content+added%3A+Issue+32%3A2+Statistical+Journal+of+the+IAOS+online&utm_campaign=20160527_m131742058_First+news+release+June+issue+SJI+-</p>

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		+IAOS%2FISI&utm_term=An+approach+for+using+administrative+records+to+reduce+contacts+in+the+2020+Decennial+Census https://content.iospress.com/download/statistical-journal-of-the-iaos/sji1006?id=statistical-journal-of-the-iaos%2Fsji1006&utm_source=MadMimi&utm_medium=email&utm_content=New+Content+added%3A+Issue+32%3A2+Statistical+Journal+of+the+IAOS+online&utm_campaign=20160527_m131742058_First+news+release+June+issue+SJI+-+IAOS%2FISI&utm_term=Plans+and+innovations+for+the+2020+decennial+census+of+the+United+States_2A
5) Documents pertaining to the 2018 End-to-End Testing	a. Memoranda or other documents related to Defendants' decision to cancel peak operations for two 2018 End-to-End Tests in Bluefield-Beckley-Oak Hill, West Virginia and Pierce County, Washington	https://www.census.gov/newsroom/press-kits/2018/2018-census-test.html https://www.census.gov/programs-surveys/decennial-census/2020-census/planning-management/program-briefings/2017-07-11-pmr.html
5) Documents pertaining to the 2018 End-to-End Testing	b. Memoranda or other documents sufficient to show challenges, obstacles, or deficiencies identified as a result of the Rhode Island End-to-End Test	https://www.census.gov/programs-surveys/decennial-census/2020-census/planning-management/program-briefings/2018-01-26-pmr.html
5) Documents pertaining to the 2018 End-to-End Testing	c. Memoranda or other documents sufficient to show Defendants' plans to address any challenges, obstacles, or deficiencies identified as a result of the Rhode Island End-to-End Test	https://www.census.gov/programs-surveys/decennial-census/2020-census/planning-management/program-briefings/2018-01-26-pmr.html
6) Documents pertaining to	a. Memoranda or other documents sufficient to show Defendants' plans to address any	

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the funding of the 2020 Census	funding shortfalls relative to the 2010 Census preparations to date	https://www.census.gov/programs-surveys/decennial-census/2020-census/planning-management/planning-docs/operational-plan.html
6) Documents pertaining to the funding of the 2020 Census	b. Any and all updates or revisions to the 2020 Census “spend plan” for Fiscal Years 2017 and 2018	https://www.census.gov/programs-surveys/decennial-census/2020-census/planning-management/program-briefings/2018-01-26-pmr.html
6) Documents pertaining to the funding of the 2020 Census	c. Documents sufficient to show the spend plans for the funding directed towards the 2020 Census in the 2018 Omnibus Bill and any future funding to be appropriated by Congress for the 2020 Census	https://www2.census.gov/programs-surveys/decennial/2020/program-management/pmr-materials/04-20-2018/pmr-welcome-high-level-updates-04-20-2018.pdf
6) Documents pertaining to the funding of the 2020 Census	d. Documents sufficient to show any agreements to date between the Office of Management and Budget and the Commerce Department regarding the funding of the 2020 Census	https://appropriations.house.gov/uploadedfiles/03.21.18_fy18_omnibus_-_commerce_justice_science_-_one_pager.pdf https://appropriations.house.gov/uploadedfiles/03.21.18_fy18_omnibus_-_commerce_justice_science_-_one_pager.pdf
7) Documents pertaining to the overlap between immigration enforcement and the 2020 Census		https://www.census.gov/privacy/ https://oversight.house.gov/hearing/progress-report-on-the-2020-census/