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Washington, DC 20233

## **2030 Census LUCA Enhancement Proposal**

Dear Ms. Stempowski, Ms. Reichert, and Ms. Bishop,

### **Purpose of this Proposal**

Building on the opportunity for stakeholder recommendations set forth in the *Federal Register Notice* on [Soliciting Input or Suggestions on 2030 Census Preliminary Research](#), we are offering suggestions for improving the 2030 LUCA Operation.

### **Background on the LUCA Operation**

The [Local Update of Census Addresses \(LUCA\) Operation](#) is a voluntary decennial census operation. LUCA is important because it is the only opportunity prior to the decennial Census for tribal, state, and local governments to review and update the U.S. Census Bureau's Master Address File (MAF).<sup>1</sup> The MAF is the Census Bureau's list of all residential addresses to be used for decennial census outreach and enumeration. The Census Bureau relies on a complete and accurate address list to reach every living quarter and associated population for inclusion in the census. The Census Address List Improvement Act of 1994 (Public Law 103-430) authorizes LUCA.

(<https://www.census.gov/programs-surveys/decennial-census/about/luca/act-1994.html>)

### **Timing and Duration of LUCA 2020**

For the 2020 Census, the *review phase* began in February-April 2018, when materials were delivered to registered participants. LUCA participants had 120 calendar days from receipt of Census Bureau materials to conduct an address review and return updates to the Bureau.

### **Census Block-Level Address Counts**

The Census Bureau regularly updates and publishes files summarizing their latest block-level housing unit counts (including transitory units) and group quarters counts. The latest iteration of these block-level count files is called [Current Address Count Listing Files](#).<sup>2</sup> Localities can use the Census Bureau's block-level address counts to prepare for LUCA submissions by considering disparities between Census counts and counts from local administrative sources. (An example of such an evaluation is [New York City's count discrepancy research](#) in 2016-2017.)

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<sup>1</sup> Access to the MAF is governed by confidentiality protections afforded under Title 13, U.S.C.

<sup>2</sup> In the lead-up to the 2020 Census, the files were provided through various programs including the Geographic Support System initiative (GSS-I), Geographic Support System (GSS), Spatial, Address, and Imagery Data (SAID), and eventually the initial Address Count Listing Files.

## Efficiency of Examining Exact Addresses from MAF vs. Block-Level Housing Unit Counts

It is important to understand that there can be multiple housing units at the same Basic Street Address. For example, at the Basic Street Address (BSA) 100 Main Street there could be 3 housing units (Apt. A, Apt. B, and Apt. C). *Exact addresses* from the MAF refer to the BSA along with the unit designator of each individual housing unit – using the previous example, an *exact address* would be 100 Main Street, Apt. A. Using these *exact addresses* from the MAF, localities can identify discrepancies in housing unit counts at the BSA level and determine which units may be missing or in need of an update. Such an analysis is not possible using block-level housing unit counts. Block-level analyses can only identify blocks with overall discrepancies between Census Bureau housing unit counts and alternative sources. In such block-level analyses, every address in discrepant blocks must be reviewed, as opposed to an analysis of *exact addresses*, where a more targeted review can focus on the specific locations within a block that are discrepant. Further, discrepancies within a census block may be masked by compensating errors when working with block-level address counts, unlike analyses of *exact addresses* derived from the MAF.

## Current Status of 2030 LUCA Timeline

At a January 2024 meeting with New York State & New York City partners, the Census Bureau’s Geography Division reported that they intend to make several changes to the 2030 LUCA Operation, including: extending the *review phase* to 180 days (from the previous 120), adding a new *preview phase*, and developing tools to streamline data comparisons to the MAF. The Census Bureau also committed to having ongoing conversations with partners to focus on problem-points like group quarters and challenges in providing housing unit designators where such information is unknown.

The new *preview phase* would allow participants to access an early version of the MAF from roughly February-August 2028.<sup>3</sup> Participants would then receive an updated version of the MAF for the *review phase* of LUCA, which would take place around September 2028-March 2029.

While the Census Bureau’s planned changes to the LUCA Operation mentioned here are a step in the right direction, this proposal goes further in enhancing the operation.

## Why the LUCA Operation Needs Improvement

Reviewing and updating census addresses is a time-consuming and labor-intensive process for localities that have the awareness and wherewithal to participate in the LUCA Operation. Done well, LUCA participants can vet potential data sources via cross comparisons and fieldwork years before their final submission. This vetting can be further honed by incorporating block-level housing unit counts from the Current Address Count Listing Files. This is an approach currently possible, but a preliminary “sneak peak” MAF would help participants be more efficient in vetting alternative sources. The increased efficiency for participants should translate into higher quality submissions, more likely to yield successful decennial enumerations. Of course, high-yield LUCA submissions – which result in many successful enumerations – are ideal for the Census Bureau. Such submissions diminish the demands of field-canvassing, reduce the time the Bureau spends internally assessing addresses, and ultimately improve Census coverage.

While the ideal LUCA Operation would have wall-to-wall participation across the country, with all submissions resulting in successful enumerations, such an ideal is realistically unachievable. However, there are many ways the 2030 LUCA Operation can at least come closer to that ideal. The 2030 Census faces new challenges. Looser accessory dwelling unit regulations, hybrid residential/hotel situations, and increased commercial to residential conversions all point to the greater complexity in uncovering hidden/low visibility housing and heightened importance of both our local update of addresses and Census Bureau field canvassing. To navigate these challenges the Census Bureau can enhance the LUCA Operation by increasing general awareness, providing earlier MAF access, expanding submission windows, supporting localities in their pursuit of high-quality submissions, and providing participants with a better understanding of what

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<sup>3</sup> Under the usual protocols for ensuring confidentiality under Title 13, U.S.C.

worked well with the 2020 LUCA Operation. The following is a detailed set of proposals that will help the Census Bureau achieve these goals.

## **Proposed LUCA Enhancements:**

### **#1) Option for a “Preliminary” MAF pull**

An optional preliminary MAF pull in 2026 would give participants an earlier opportunity to review the Census Bureau’s residential address list as it might look on Census Day and thus allow them to spend more time on the ground researching to prepare a better submission. This preliminary pull would then be followed by the already scheduled MAF pulls during the upcoming *preview* and *review phases* in 2028. To ease the burden on both Census Bureau reviewers and participants themselves, participants would still only make one submission at the end of the *review phase*.

### **#2) Add information to Address Count Listing Files (ongoing bi-annual census block tally files)**

In addition to the count of housing units and group quarters on each census block, it would be useful for the Address Count Listing Files to also include the number of Basic Street Addresses (BSAs) on each block as well as the count of group quarters by facility type.

It would also be helpful to add a measure of “MAF stability” to these block files, which could indicate what percentage of the block’s addresses have been consistently enumerated in recent censuses (across decades) and what percentage may be either new to the MAF or inconsistently enumerated. These data would help localities identify problem blocks in their jurisdictions.

The Census Bureau’s [Real-Time 2020 Administrative Record Census Simulation](#) describes issues with matching administrative records to MAF addresses. It could be beneficial to use federal administrative records to supplement local knowledge and insights from grassroots community organizations for identifying areas for local field canvassing.

### **#3) Feedback statistics on the outcome of 2020 LUCA submissions**

It would be useful to understand the outcomes of 2020 LUCA submissions when crafting a new LUCA submission for 2030. To this end, we encourage the Census Bureau to provide statistics on whether 2020 LUCA address additions and corrections were successfully enumerated and whether that enumeration took place during the self-response phase, NRFU, through a proxy, administrative record, or imputation. Ideally, these statistics could be provided at the census block-level (and make it clear which government was the source of the submission in cases of overlapping jurisdiction). If participants could better understand which address changes were successful, they could better investigate data sources, check what may have gone wrong/right, and prepare better-tailored submissions for the 2030 Census. Given privacy concerns about linking LUCA to the Census enumeration, the Census Bureau could take steps to ensure this feedback is non-disclosive. Making this feedback part of a packet with the preliminary MAF pull might address privacy concerns as all participants would have signed a confidentiality agreement.

Additionally, participants could receive information about addresses “deleted” during the 2020 Census. Participants might wonder whether addresses were removed because they were duplicates, not found, no longer considered housing units, or had another reason for deletion. Having this information would be helpful in considering the potential resubmission and reinstatement of addresses for the 2030 Census. Similarly, there might be other information on the differences between the MAF going into the 2020 Census and the MAF immediately post-enumeration that could benefit the 2030 LUCA process.

#### **#4) Extend LUCA MAF review period from 120 to 180 days**

Given the intensive review necessary to evaluate the MAF against alternative address sources, LUCA participants could provide the Census Bureau with higher quality, and more extensive, address updates if given more time to review. Consequently, we strongly endorse and encourage the Census Bureau's plan to extend the LUCA review period from 120 days to 180 days and to provide a 180-day preview period in advance of this review period. It is helpful to note that giving participants more time to review was a recommendation in the [U.S. Government Accountability Office \(GAO\) report of October 2019](#) on improving the Census Bureau's process for working with governments to build the address list.

#### **#5) Give participants the ability to flag apartment unit designators as uncertain**

Often local governments have knowledge of the total number of residential units in a given building or address but lack certainty about the specific housing unit designators used to identify the distinct units. In some cases, no such unit designators are used by residents and mail may be informally distributed from a single collection point. Housing units may be informal and lack designators (e.g. accessory dwelling units, pods, basement apartments, subdivisions within multi-unit structures, trailer parks, or dual use commercial/residential addresses). In recently constructed buildings, designators may not yet be finalized or known to local governments at the time when participants must make a submission under the LUCA or new construction operations. 2020 LUCA submissions required the inclusion of unit designators, and thus required participants to manufacture "best-guess" designators for addresses with unknown designators. This may have caused 2020 Census issues for both mailings and NRFU to identify and reach units that had not responded, or had already responded. If there were an option to flag uncertain designators, and better adapt to these situations of uncertainty/informality, it could help with enumerating the correct number of units at a given address, rather than adding confusion with fabricated designators.

#### **#6) Provide localities with an official Census Bureau letter confirming LUCA participation**

An official letter providing background on the LUCA Operation and affirming each locality's status as a LUCA participant could help facilitate collaboration and be used to allay concerns about sharing sensitive information. For example, participants may find it productive to reach out to housing developers, group quarters operators, or local U.S. Postal Service mail carriers, to discuss their understanding of housing unit designators.

#### **#7) Host or support a forum for discussing shared challenges and questions among potential LUCA participants**

Given the variability in size and financial resources of LUCA participants, and that many participants will be facing similar issues, it would be helpful to have a forum where jurisdictions can talk to each other, share their respective approaches and any best practices, discuss challenges, and work collectively to resolve issues. Such a forum should also promote dialogue between the Census Bureau's Geography Division and LUCA end-users. Accordingly, we suggest the Census Bureau help establish such a forum, to be run by LUCA participants. Further, the Census Bureau could help facilitate collaborations by publishing a periodically updated map showing which localities are participating in LUCA along with their points of contact.

#### **#8) Add Census Bureau geographic staff to support LUCA participants**

Provide greater support to LUCA participants by enhancing the number of Census Bureau geographic support staff assigned to the operation and locating them in states and areas that are especially hard-to-count. Such an expansion could also help the Census Bureau support earlier training on the LUCA review tool (GUPS), address matching, and geospatial technical matters. Updated guidance on definitions of what constitutes a residential address or group quarters will also be helpful (including how to deal with various situations such as AirBnB and seasonal residences). Support staff could also work with localities to identify local sources on planned housing construction so that the MAF better reflects recent building activity before participants weigh in during both the LUCA Operation and New Construction Program.

**Proposed New Timeline for 2030 LUCA:**

| <i>Phase</i>   | <i>2026</i>   | <i>2027</i> | <i>2028</i>   | <i>2029</i>    |
|--|---------------|-------------|---------------|----------------|
| <b>Pre-LUCA</b> – Address Count Listing Files (census block-level) available and updated biannually, including BSA & GQ facility type counts, as well as MAF stability and Administrative Record indicators ( <b>proposal #2</b> ).<br>Participants can begin research, compile/vet local address data, and compare census block housing unit & GQ counts. Census Bureau establishes LUCA participant user-forum ( <b>proposal #7</b> ). | (Pre-2026)    |             |               |                |
| <b>Announcement</b> – Census Bureau sends a formal announcement with info on 2030 LUCA to Highest Elected Officials.   | 1/2026        |             |               |                |
| <b>Invitation</b> – Census Bureau sends invitations to participate in LUCA with an option to access early supporting research files ( <b>proposal #1</b> ).  | 2/2026-3/2026 |             |               |                |
| <b>Early Supporting Materials</b> – Supporting research materials available for participants opting to receive them, including preliminary MAF pull, 2020 LUCA feedback statistics, & official letter acknowledging LUCA participation ( <b>proposals #1, 3, &amp; 6</b> ).  | 4/2026-3/2027 |             |               |                |
| <b>Preparatory Research</b> – Participants use early supporting materials to assist with targeted research, address canvassing, and preparation of local data for eventual submission.   | 4/2026-1/2028 |             |               |                |
| <b>Preview Phase</b> – Census Bureau shares the latest version of the MAF with participants and deploys additional support staff to provide training and workshop questions for 180 days before the <i>review phase</i> ( <b>proposal #8</b> ).  |               |             | 2/2028-8/2028 |                |
| <b>Review Phase</b> – Census Bureau shares the latest version of the MAF (updated since <i>preview phase</i> ). Participants have 180 days from receipt to prepare and send a submission of additions & deletions ( <b>proposals #4 &amp; 5</b> ).   |               |             | 9/2028-3/2029 |                |
| <b>Processing</b> – Census Bureau ingests submissions & creates feedback/appeal materials.   |               |             |               | 3/2029-8/2029  |
| <b>Appeal Phase</b> – Participants review feedback, submit appeals.  |               |             |               | 9/2029-11/2029 |
| <b>Closeout Phase</b> – Participants receive appeal results and destroy Title 13-protected materials.  |               |             |               | 12/2029        |

**Signatory Page:**

Thank you for your time and careful consideration of these proposals.

Sincerely,

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