



## **A Strategy for Early California Efforts to Improve Enumeration of Immigrants in Census 2020**

*by Ed Kissam  
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### **Overview**

An accurate decennial census is of critical importance to California, to assure fair political representation and equitable receipt of federal funds. Very large amounts of federal funding, more than \$550 billion each year, are now distributed using formulas driven by census data.<sup>1</sup> With 12% of the U.S. population, California's "fair share" of federal census-driven funding is at least \$66 billion per year currently and should increase to about \$83 billion in 2021.<sup>2</sup>

Housing patterns, language, educational attainment, household income, working hours, household composition, cultural perspective, immigration status, immigrants' length of residence in the U.S., and motivation all affect likelihood of census enumeration. Thus, California runs a very high risk of receiving less than its fair share of federal dollars in census-driven programs because immigrants are particularly likely to be missed in the decennial census and because California's population has the highest proportion of immigrants of any state--27%--more than double the US average.<sup>3</sup>

### **Urgent Action in 2017 is Needed to Assure Success**

A well-designed and well-funded state initiative to ameliorate the historical undercount of California immigrants can generate an increase of at least \$400 million per year in federal revenues over the decade from 2021-2030. In order to be fully successful, such an initiative must be up and running by 2017 because a key opportunity to overcome differential undercount of minorities and immigrants rests on building robust partnerships between the Census Bureau, local government, and grassroots community-based organizations to improve its address list—the Master Address File (**MAF**).

The collaborative process through which the Census Bureau invites local government (counties and municipalities) to review and correct its address list (the MAF) is known as **LUCA** (Local



Update of Census Addresses). This process begins in January, 2017 and must be completed by early 2018.

About half of the historic undercount of minorities and immigrants is due to deficiencies in the MAF and, thus, prompt action to support and enhance local address listing is the best chance to make a difference. Expanding, extending, and improving the 2017 LUCA process can provide a solid foundation for successful high-quality enumeration in 2020.

### **Why LUCA is a Strategic Key to Overcoming Undercount**

LUCA is a strategic key to improving on the historic undercount of minorities and immigrants because those places where people live which are not included in the MAF have no chance of being enumerated. Consequently, the low-income families living in crowded housing, or low-visibility “unusual” housing units which are most often missing from the census address list may be entirely missed in the census process. Even if the occupants are eager to participate, unless they receive a census form they cannot be counted. Or, if they respond online (an option that will be available for the first time in 2020), their response may be ignored because the Census Bureau has no address on record for them, or their bona fide response may be mis-coded as being a duplicate. Without improvements in the MAF, even well-designed efforts to promote census participation are, inevitably, compromised. Early action is essential!

### **An Opportunity for GCIR Members to Maximize their Impact**

The national Funders’ Census Initiative 2020 network, which includes representation from GCIR, has made an important step forward by initiating discussions of census strategy beginning in 2015—midway through the decennial census cycle. This early start on confronting the problems faced in Census 2020 makes it possible for philanthropy to have a greater impact in contributing to an equitable census than ever before.

To take full advantage of this strategic initiative GCIR will need to develop partnerships with key stakeholders—immigrant advocacy groups, community-based grassroots organizations, state, county, and municipal government, and social service and health providers in the California communities with the densest concentrations of low-income immigrants—in order to have the best possible impact.

Immigrant engagement in Census 2020 can, and should, begin in 2017. Immigrants can be part of the solution, not part of the problem. As a result of cost-cutting, but also partially as a consequence of unwarranted faith in high-tech solutions such as satellite imaging, the Census Bureau’s own ability to repair its flawed Master Address File is limited.



The reality is that local knowledge, cultural competence, and social networks of individuals in the immigrant community and organizations serving immigrants can actually do a better job than the Census Bureau itself. GCIR can have a huge impact by helping its grantees train and mobilize local immigrant communities to, in turn, help local municipalities and counties with the 2017 LUCA process. GCIR will need to be strategic to successfully mobilize local address canvassing.

But even proactive and generous philanthropic support cannot do it all alone. GCIR will also have to work strategically to promote state-funded efforts to mobilize local address canvassing carried out via partnerships between local government and grassroots community groups.

### **Going Beyond Business as Usual to Address the Undercount of Immigrant Families**

Census 2020 presents serious challenges but also novel opportunities to overcome census undercount. In past years, the Census Bureau and its partners have not adequately focused on overcoming the extreme undercount of immigrants because the problem was typically seen as only a question of undercount of ethnic/racial minorities. Minorities are undercounted and differential undercount in of minorities does play a major role in blunting efforts to address social and economic injustice—but, within the overall undercounted population, immigrants are most often left out because a convergence of “structural” factors (crowded, low-visibility housing, unauthorized immigration status, language barriers, low literacy, complex living arrangements where multiple family/social units live together) interact to generate a mega-undercount of immigrants.

### **Proactive Approach for a California Complete Count of Immigrants**

The problems inherent in the Census Bureau’s Master Address File stem from the fact that many among both the native-born and immigrant families living in sub-standard, crowded, “unusual”, and/or “low visibility” housing never even receive a census form. The census address list problem will persist and is likely to become even more severe in Census 2020 than in past decennial censuses (because reductions in the Census Bureau’s budget have resulted in reduced address canvassing effort).<sup>4</sup>

### ***The History***

For at least four decades, states and major urban cities such as New York, Los Angeles, Miami, and Houston have been concerned about the differential undercount of racial and ethnic minorities. These concerns are still valid—but research over the past several decades shows that immigrant households, particularly those who are low-income, living in crowded or sub-



standard housing, limited in English, and less-educated are much more likely to be missed in the decennial census than any other population group.<sup>5</sup>

### ***Findings relevant to effectively using LUCA as a means to MAF Improvement***

Municipalities and counties cannot simply rely on administrative records in implementing LUCA—because those records inevitably have limitations since the most socially and economically marginal populations most at risk of undercount are underrepresented in them. Successful LUCA implementation will require locally-targeted, locally-managed address canvassing

Low-income native - born and immigrant-headed households are both at high risk of being totally missed in the decennial census if they live in a low-visibility “unusual” housing unit or crowded housing accommodations shared by multiple families or unrelated individuals. But the reason the undercount of low-income immigrant families is so much higher than it is for native-born families is that they are more likely to live in crowded housing and ultimately have to overcome more barriers in responding to the census—due to language, low literacy, and, in 2020, less access to the Internet (an important mode of census response in 2020).

The immigrant undercount problem is not simply an urban one affecting large metropolitan areas such as the Los Angeles basin, Orange County, San Jose, and the San Francisco Bay area. It appears wherever there are concentrations of immigrants—in smaller urban areas such as Bakersfield and Fresno, throughout rural California, and other ex-urban areas such as the Inland Empire. The success of a California Complete Immigrant Count hinges on widespread local government participation in LUCA even in smaller financially-strapped counties and communities throughout the San Joaquin Valley, the Central Coast, and the Sacramento Valley.

Helping municipalities throughout the state add low-visibility housing units to the Census Bureau’s Master Address File via LUCA, as well as presenting a one-time only chance to strategically work to overcome differential undercount, also, provides an opportunity to begin early on to assure low-response populations that the decennial census will provide tangible benefits for their community and that the information they submit is confidential.

### **Expected Impact and Strategic Considerations**

It is important to recognize that a well-designed program to help local governments implement LUCA with targeted address-canvassing and Master Address File improvement efforts, will positively affect enumeration in all neighborhoods with a concentration of low-income households. Thus the focus on targeted canvassing in poor areas is consistent with special efforts to improve enumeration of immigrants, as long as it is done well.



Sound targeting for LUCA will result in a similar decrease in overall undercount rate. About half of the improvements will result from adding immigrant-headed households to the address list (because they are more likely to live in crowded or low-visibility housing) and half from adding native-born households.

In addition to identifying “low-visibility” housing units address canvassing via LUCA can also address another challenging issue-- the conflict between the Census Bureau’s definition of “household” and the prevailing one in low-income communities where there are more “complex households” shared by different families, families and unrelated individuals and where concepts of social/economic family unit are at odds with census instruction to “report everyone living here”. Improved procedures for tabulating responses from crowded, complex households will further improve census enumeration.<sup>6</sup> Local address canvassing conducted by local culturally, and linguistically competent can identify these places and begin work toward overcoming the problem of undercount partial household omission in the complex households.

### **Strategic Implication--State Support is Needed to Assure a Robust LUCA Process**

California should make an early decision and develop a systematic approach to assist local government in the LUCA process, with a top priority within the overall LUCA process being a “California Complete Immigrant Count” initiative which begins with support for local governments with concentrations of immigrant households to build partnerships with grassroots community groups to add low-visibility housing units to the Master Address File.

Improved enumeration of immigrant-headed households stemming from adding low-visibility housing units to the MAF can increase federal funding in the decade from 2021-2030 by at least \$250 million per year, i.e. about \$2.5 billion over the decade.<sup>7</sup> At the same time, well-targeted LUCA operations would decrease undercount of native-born minority households in those same “hard to count” neighborhoods by about \$152 million per year, about \$1.5 billion over the decade—a net financial benefit of about \$4 billion over the decade. (For details see the companion paper “Estimating the Potential Impact of LUCA-based Census Address List Improvement on California Differential Undercount,” by Ed Kissam, 2 September 2016).

It is critical to move rapidly to initiate and adequately fund a program of state assistance to encourage and assist municipalities and counties with less financial and staffing resources in moving forward rapidly and effectively with LUCA. While municipalities such as Los Angeles have traditionally sought to add low-visibility housing to the Census Bureau’s address list, many of the smaller municipalities and rural counties with concentrations of low-income undercounted groups—minorities and immigrants—do not have the resources to undertake a robust LUCA initiative.



The need for speed stems from the fact that the Census Bureau's operation are on an inflexible timetable. Letters inviting municipalities to join in LUCA will be sent out from January-March of 2017, municipalities which want to participate will be provided technical assistance and training by the Census Bureau's Los Angeles regional office during the summer of 2017 and the LUCA process will kick off in Fall, 2017, as the operational plans require that it be completed in time for the Integrated Test of Census Operations which will take place on April 1, 2018.

It has traditionally been assumed that local government would be able to rely on its own administrative data and local knowledge to successfully add addresses to the Census Bureau's list via LUCA—but administrative data are deeply-flawed in identifying immigrant households (since undocumented families are often not included in rosters of clients for programs such as TANF and SNAP). Moreover, planning department data will often be inadequate also since many of the "unusual" housing quarters are actively concealed (because such living quarters are often in violation of local zoning ordinances).<sup>8</sup> Local government success in LUCA will rest on developing solid partnerships with local grassroots community groups to undertake well-targeted "in field" address canvassing.

Robust funding for LUCA is required because the most effective approaches to adding low-visibility, "unusual" housing units to the Master Address File will be to establish partnerships in which local government collaborates with grassroots community groups which have in-depth knowledge of and rapport with undercounted populations in order to successfully identify and add to the census address files the low-visibility housing units.<sup>9</sup>

Local government—municipalities and counties—are, within the Census Bureau operational framework, the primary players in LUCA. However, in the new context where the Census Bureau's own address canvassing has been drastically cut back and where optimal implementation of LUCA requires skillful deployment of local knowledge and resources, building partnerships to secure the trust and collaboration of historically undercounted populations, there will be an urgent need for LUCA strategy to include intensive capacity-building efforts during the spring and summer of 2017 in preparation for successful LUCA partnerships in the fall and winter of 2017.

### **Key Phases in Implementing California's Census 2020 Improvement Initiative**

The first step toward implementing a strategic initiative to decrease undercount in California in Census 2020 will be to set up and fund the state's California Complete Count Committee as a locus for census improvement efforts. The optimal strategy will be to have the Committee in place by January 1, 2017. Because immigrant undercount is so serious it will be crucial to assure the involvement of the Governors' Office of Immigrant Affairs in the overall state



complete count initiative so as to assure adequate attention is given to the distinctive challenges of overcoming this problem

***Priorities in 2017—MAF Improvements from local address canvassing as part of LUCA***

LUCA presents the state’s best opportunity to reduce overall undercount in California since at least half and, in some areas, up to two-thirds of the households omitted from the decennial census are left out because they were never in the Master Address File.

Because LUCA is conducted within an inflexible time frame (January, 2017-April, 2018) the California Complete Count Committee’s first task must be to promote widespread LUCA participation and to offer state-funded financial support to assist municipalities in mounting a robust, effective LUCA process. The timetable for implementation of enhanced LUCA needs to focus first on encouraging undecided and reluctant municipalities to make the commitment to participate (January-June 2017).

This campaign will need to build local awareness of the fiscal importance of the decennial census, understanding of the need to focus on adding low-visibility households to the address list, and the limitations of administrative records for accomplishing this. State promotion of widespread, full-fledged LUCA participation will also need to build local government awareness of the utility of partnerships with local grassroots organizations most familiar with historically undercounted populations (e.g. low-income farmworkers, immigrants, ethnic/racial minorities) to assure successful local address canvassing.

State efforts to promote robust LUCA participation will need to offer the prospect of financial support for local efforts in order to encourage full-fledged local government participation and development of robust partnerships.

California’s Complete Count initiative will need to give careful attention to LUCA planning during the summer of 2017 in order to determine delineation of responsibility for LUCA so that counties and municipalities do not duplicate efforts. It is feasible and desirable during the summer for localities to secure Census Bureau maps of historically-undercounted census tracts in their jurisdiction and to use these maps, in conjunction with local knowledge of community conditions to target local address canvassing which will take place in the course of LUCA.

State support for LUCA implementation will not need to be funded before August, 2017 but funding commitments will need to be made during the spring so that municipalities can then move rapidly to ramp up their local campaigns which will need to be in full operation during the fall of 2017 and winter of 2017-2018. State-funded support for LUCA operations, particularly local address canvassing, will be important in making LUCA successful both in the municipalities



which are reluctant or uncertain and in those which are eager to participate but lack resources. Cost-effective implementation of LUCA will also rest on systematic and well-informed targeting of local address listing efforts to focus on those neighborhoods (census tracts) with the highest risk of total household omission.

The Los Angeles Regional Office of the Census Bureau has been highly collaborative in past decennial censuses and will, once again, be a crucial partner and resource for Census 2020. It will be important for the state, counties, and local municipalities to work collaboratively with the regional office in order to streamline the process of local update of census addresses and to overcome a range of technical challenges to address list improvement.

A promising possibility is that, with close collaboration and success in streamlining the process of adding addresses during LUCA in 2017, it may be possible to continue adding low-visibility address and new housing units which are not included in standard data sources (the US Postal Service address file, commercial address lists) in 2018 and 2019.

As Joseph Salvo of the New York City Planning Department has noted in a recent article, the eventual success of non-response follow-up (NRFU), another crucial census operation, will rest also on accurately identifying vacant housing units, ideally by moving to a “continuous” system of adding low-visibility housing and deleting vacant housing so as to assure MAF quality. Conceivably the silver lining to the overwhelming set of difficulties stemming from unwarranted reductions in Census Bureau budget will be new models of federal-state-local government-community collaboration in the census process.

### ***Priorities in 2018-2020: Promoting Census Response and effective Non-response follow-up***

Traditionally, most census improvement efforts have focused on promoting census response by households which may not be willing or well-prepared to respond. These efforts will continue to be important in Census 2020, in part because lower response rates burden the Census Bureau with more intensive efforts in non-response follow-up and threaten census accuracy.

Messaging to promote census participation will need to become more culturally competent, better-targeted to high-undercount populations, and rely more extensively on local messengers so as to build trust. To successfully enhance motivation, unauthorized immigrants will need to be assured that census participation is safe and that they will themselves have access to the sorts of benefits census-driven funding of social programs makes available to the community at large.

Assistance to low-literate census respondents will need to be better-designed, particularly in navigating the unfamiliar format of the standard questionnaire, in understanding problematic



queries re race/ethnicity.<sup>10</sup> Specifically, navigation instructions will need to address the competencies referred to by ETS in its National Adult Literacy Survey research as “document literacy”. There are exciting new possibilities in deploying cutting-edge website design to provide online in-language questionnaire assistance to less-educated immigrant respondents who are, nonetheless, slightly digitally literate. “Neighbors-helping-neighbors” campaigns also show promise.

Innovations in census operations for Census 2020, most importantly, the Bureau’s heavy reliance on online response, will require innovative census improvement efforts from California’s Complete Count Committee and all stakeholders in order to improve low-income, less-educated head of households’ ability to respond online. Internet connectivity of low-income individuals continues to improve but the socially-marginal, economically-disadvantaged households most likely to have been missed in past decennial census are those with lowest Internet connectivity.<sup>11</sup>

Non-response follow-up will need to be enhanced, especially by hiring enumerators who can easily and reliably establish rapport with potentially hostile or fearful non-respondents. Unfortunately, research shows that census offices which are overwhelmed with high levels of non-response follow-up have serious operational problems and that those operational problems contribute significantly to eventual differential undercount.<sup>12</sup>

### **Summary Conclusions**

Census 2020 has both promise and potential risk. As a result of declining federal funding for decennial census operations, stakeholders who recognize the importance of census data for distribution of federal funding and for political representation will have to work harder to make the upcoming decennial census a successful one.

The first, and most important step, toward eliminating differential undercount in California will be to support collaborative partnerships in which local government engages local grassroots groups in on-the-ground address canvassing to add low-visibility housing units to the census address file via the LUCA process. These efforts, in 2017 and 2018, will launch the state onward toward assuring that Census 2020 is a success.

Reducing differential undercount in 2020 will yield huge benefits to California and to undercounted minority and immigrant communities themselves throughout the entire decade from 2021-2030, due to a more “complete count”, but also as a result of improvements in the American Community Survey (since the sampling frame for the ACS is skewed by differential undercount of minorities and low-income households based on the decennial census).<sup>13</sup>



At the same time, there is the possibility in making good progress toward a more collaborative census process—for the 2020 decennial census and in the future.

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## End Notes

<sup>1</sup> The Brookings Institution developed an estimate of \$446 billion in census-driven funding to states in FY2008 (Andrew D. Reamer, “Counting for Dollars: The Role of the Decennial Census in the Geographic Distribution of Federal Dollars”, Metropolitan Policy Program, March 2010). The estimate presented here for census-driven state funding assumes that it has grown at the same rate as the federal budget (data from [http://www.usfederalbudget.us/download\\_multi\\_year\\_2006\\_2021USb\\_17s2li101mcn\\_F0t.](http://www.usfederalbudget.us/download_multi_year_2006_2021USb_17s2li101mcn_F0t.) )

<sup>2</sup> In FY2013, California, in fact, received about \$66.7 billion in federal grants (Pew Charitable Trusts). Not all of these grants were driven by census data but, at the same time, some of the census-driven federal funding includes loans and direct payments.

<sup>3</sup> Based on American Community Survey data 2009-2013. A detailed table can be found at: <http://www.indexmundi.com/facts/united-states/quick-facts/all-states/foreign-born-population-percent#chart>

<sup>4</sup> The Census Bureau’s Operational Plan for Census 2020 (December 31, 2015) has details on changes in census operations, including contraction in address canvassing scope to only 25% of all addresses. Surely, California should advocate for augmented funding for the decennial census to overcome this problem but, given the political climate, the timing is likely to preclude improvements in the Census Bureau’s own address listing (AdCan) as a result of better funding. For insights on the Census Bureau’s budget, see Terri Ann Lowenthal December 21, 2015 Census Project blog post reporting a 10% budget cut for FY2016. Efforts are underway to sustain funding for the decennial census in the FY2017 budget but outcomes are uncertain.

<sup>5</sup> The most definitive research on “total household omission” was conducted by David Fein and Kirsten West in conjunction with the 1986 Los Angeles Test Census (David J. Fein and Kirsten West, “The Sources of Census Undercount: Findings from the 1986 Los Angeles Test Census”, *Survey Methodology*, December, 1988). Fein and West report that 39% of “total non-match households” never appeared on census address lists. Their analysis (Figure 3) makes it clear that the overwhelming majority of the households at non-listed addresses were “unusual” and that, moreover, immigrant households were disproportionately omitted. In his research on the Los Angeles Test Census, Fein found that 6.7% of housing units were “unusual” (i.e. low visibility) and that in 17.8% of these low-visibility households, everyone who lived there was missed in the census (i.e. total household omissions). The most thorough and comprehensive discussion of causes of undercount in the research literature is David Fein’s Ph.D. dissertation, “The social sources of census omission: Racial and ethnic differences in omission Rates in recent U.S. censuses”, Princeton University, 1989.

<sup>6</sup> The very definition of “household” is in question in the decennial census since the “residence rules” promulgated by the Census Bureau conflict with real-world dynamics in low-income and immigrant communities. Most contemporary researchers, including the Census Bureau’s own ethnographic researchers, note how powerful the concept of household as “family” or “social unit” is for people living in crowded or “unusual” housing



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arrangements while the Census Bureau’s concept of “household” is basically, “living under one roof”. Although census form instructions ask the respondent to report on everyone living in the housing unit, the research shows the census respondent who fills out the census form sometimes find this difficult (e.g. when the four farmworkers in the living room of a single-family dwelling don’t know who the two farmworkers living in the back bedroom are) back, awkward, “wrong”, or dangerous (e.g. when the homeowner who is illegally renting out all her bedrooms illegally). It is possible that fairly technical coordination arrangements will be feasible to improve the enumeration of socially/economically distinct groups of people (“households” who all live under the same roof).

<sup>7</sup> The estimate of the impact of early investments in LUCA presented here is quite conservative. It assumes that the only households at risk of not having their living quarters included in the Census Bureau’s Master Address File are those in poverty—assumed to be 10% of the native-born households and 20% of the immigrant-headed households (which, however, also include US-born children). It assumes that in the “hard to count” neighborhoods where low-income, crowded, low-visibility housing is concentrated, improvements in address listing can decrease immigrant undercount by about 5% and decrease native-born household undercount by about 2%. Subsequent investments in traditional census improvement strategies—messaging to promote census participation and in enhanced non-response follow-up—can ultimately add an additional 2-3% toward better enumeration of immigrant households and 1-2% toward better enumeration of native-born households. An important consideration in 2020 is that the primary mode of response to the census will be online. Consequently, another crucial strand of census improvement (not discussed here due to space) will be digital literacy initiatives to help less-educated, less technology-oriented sub-populations respond. However, here too, LUCA is crucial because online responses will not be tabulated unless the respondent has an “address” that’s included in the Master Address File.

<sup>8</sup> For an in-depth but succinct discussion of the research on Master Address File problems as a leading cause of undercount, see Ed Kissam comments to the Census Bureau’s NPRM on LUCA, July 5, 2016. For details on observations on total household omission in low-income California farmworker communities in Census 2000 see Ed Kissam and Ilene Jacobs, “Practical Research Strategies for Mexican Indigenous Communities Seeking to Assert Their Own Identity”, in Jonathan Fox and Gaspar Rivera-Salgado (Eds.) *Indigenous Mexican Migrants in the United States*, Center for U.S.-Mexican Studies, 2006. For observations on total household omissions in Census 2010 in 33 hard-to-count rural California census tracts with concentrations of farmworkers and immigrants see Ed Kissam, “Census Enumeration of Immigrant Communities in California: Dramatic Improvements but Challenges Remain”, Conference on Hard-to-Survey Populations, American Statistical Association, December, 2012.

<sup>9</sup> In addition to problems of low-visibility housing units not being included in the Census Bureau’s Master Address File there are also problems stemming from the Bureau’s conceptualization of “household” which is in conflict with the concepts held by many low-income populations. High levels of cultural and language competency are required to successfully add low-visibility units to the Master Address File because address canvassers must be able to rely on their local knowledge of the community to identify “unusual” housing units and to engage in conversations with those who live in them to get details on housing accommodations and to assure them that it is entirely safe/confidential to provide information on substandard, possibly unauthorized, housing arrangements.

<sup>10</sup> See Ed Kissam, Jorge Nakamoto, and Enrique Herrera, “Hispanic Response to Census Forms and Procedures”, report prepared by Aguirre International for the Census Bureau, 1993.

<sup>11</sup> Pew Research has tracked Internet connectivity among different populations for some years and provides excellent background data which can guide such efforts. Another valuable resource in this context is the Center



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for Migration Studies’ interactive online database on the undocumented immigrant population which has resolution down to the community (PUMA) level and which includes a variable on Internet access.

<sup>12</sup> See, for example, Joseph Salvo and Arun Peter Lobo, “Misclassifying New York’s Hidden Units as Vacant in 2010: Lessons Gleaned for the 2020 Census”, *Population Research Policy Review*, 2013.

<sup>13</sup> At WKF we are continuing to refine and revise the model used here to provide a preliminary estimate of return on investment in California efforts to decrease differential undercount of minorities and immigrants. The initial model incorporates key parameters from the research literature on causes of census undercount, including analyses of data from PES enumerations and the unique “triple enumeration” research carried out by David Fein in the 1986 Los Angeles Test Census. However, the ethnographic research literature quite appropriately stresses the need to appreciate that the dynamics of undercount vary between different undercounted populations and within different community contexts. This will ultimately be important for California since MAF improvement may matter much more in some communities than others. The optimal strategy will be to skillfully integrate appropriate data sources to provide well-targeted LUCA efforts. Two valuable data resources are already available—the Census Bureau’s planning dataset based on 2014 ACS data which includes several indicators of “low response” census tracts, block groups, and blocks, the CMS database on undocumented immigrants (which includes several the major variables required for assessing a neighborhood’s risk of serious undercount). However, we believe our current estimate of return on investment in overcoming differential undercount in California is conservative.