

GAO

Report to the Subcommittee on  
Technology, Information Policy,  
Intergovernmental Relations and the  
Census, Committee on Government  
Reform, House of Representatives

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August 2004

## 2010 CENSUS

# Counting Americans Overseas as Part of the Decennial Census Would Not Be Cost-Effective





# Highlights

Highlights of [GAO-04-898](#), a report to the Subcommittee on Technology, Information Policy, Intergovernmental Relations and the Census, Committee on Government Reform, House of Representatives

## Why GAO Did This Study

The U.S. Census Bureau (Bureau) has typically counted overseas members of the military, federal civilian employees, and their dependents. However, it usually excluded private citizens residing abroad. In July 2004, the Bureau completed a test of the practicality of counting all overseas Americans. GAO was asked to assess (1) whether the Bureau implemented the test consistent with its design, and (2) the lessons learned from the test results.

## What GAO Recommends

Congress may wish to consider eliminating funding for additional research related to counting Americans abroad as part of the decennial census, including funding for tests planned in 2006 and 2008. However, funding for the evaluation of the 2004 test should continue as planned, particularly to inform congressional decision making on this issue. Should Congress desire better data on overseas Americans for certain policymaking and other nonapportionment purposes, Congress may wish to consider funding research on the feasibility of counting this group using alternatives to the decennial census. To facilitate this, we recommend that the Bureau, in consultation with Congress, research options such as a separate survey, administrative records, and data exchanges with other countries' statistical agencies. The Bureau agreed with our conclusions and recommendations.

[www.gao.gov/cgi-bin/getrpt?GAO-04-898](http://www.gao.gov/cgi-bin/getrpt?GAO-04-898).

To view the full product, including the scope and methodology, click on the link above. For more information, contact Patricia A. Dalton at (202) 512-6806 or [daltonp@gao.gov](mailto:daltonp@gao.gov).

## 2010 CENSUS

# Counting Americans Overseas as Part of the Decennial Census Would Not Be Cost-Effective

## What GAO Found

The Bureau generally implemented the overseas census test on schedule and consistent with its research design. Still, participation was poor, with just 5,390 questionnaires returned from the three test sites—France, Kuwait, and Mexico. Moreover, because of the low response levels, obtaining those questionnaires proved to be quite expensive—around \$1,450 per response, which is far costlier on a unit basis than the 2000 Census. Although the two are not directly comparable because the 2000 Census included operations not used in the overseas test, the 2000 Census cost around \$56 per household. Further, boosting the response rate globally might not be practical. On the domestic front, during the 2000 Census, the Bureau spent \$374 million on a months-long publicity campaign that consisted of television and other advertising that helped yield a 72-percent return rate. Replicating this level of effort on a worldwide basis would be difficult, and still would not produce a complete count. Ensuring a smooth overseas count could also stretch the Bureau's resources. For example, at each test site the Bureau encountered various challenges that needed to be resolved such as French privacy laws. Moreover, managing a complex operation from thousands of miles away also proved difficult.

### Enumerating Americans in Mexico and France



Source: GAO.

The approach used to count the overseas population in the 2004 test—a voluntary survey that largely relies on marketing to secure a complete count, lacks the basic building blocks of a successful census. The Bureau has done some initial research on alternatives, but all require more extensive review. Given that the Bureau already faces the difficult task of securing a successful stateside count in 2010, having to simultaneously count Americans abroad would only add to the challenges facing the Bureau.

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United States Government Accountability Office  
Washington, D.C. 20548

August 19, 2004

The Honorable Adam H. Putnam  
Chairman  
The Honorable Wm. Lacy Clay  
Ranking Minority Member  
Subcommittee on Technology,  
Information Policy, Intergovernmental Relations  
and the Census  
Committee on Government Reform  
House of Representatives

Although more than four million American citizens are believed to reside abroad, the precise number of overseas Americans is unknown. The U.S. Census Bureau (Bureau), the federal agency tasked with counting the nation's population every 10 years, has generally included in the census overseas members of the military, federal civilian employees, and their dependents (a group known collectively as "federally affiliated" individuals), but has typically excluded private citizens such as retirees, students, and business people.<sup>1</sup>

Under the Constitution and federal statutes, the Bureau has discretion over whether to count Americans abroad. However, in recent years, the Bureau's policy of excluding private citizens from the decennial census has been called into question. For example, advocates of an overseas census claim that better demographic data on this population group would be useful for a variety of policy-making and business purposes, and would better represent their unique interests in Congress. Moreover, in January 2001, Utah sued the Bureau's parent agency, the U.S. Department of Commerce, claiming that it lost a congressional seat because the 2000 Census excluded the state's 11,000 Mormon missionaries and other private citizens living abroad.<sup>2</sup> According to the Congressional Research Service, Utah would have gained a congressional seat had an additional 855 people been

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<sup>1</sup> Only the 1970, 1990, and 2000 Censuses used counts of federally affiliated personnel for purposes of apportioning Congress.

<sup>2</sup> *Utah v. Evans*, 143 F. Supp. 2d 1290 (D. Utah 2001), *aff'd*, *Utah v. Evans*, 534 U.S. 1038 (2001).

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included in the state's apportionment totals.<sup>3</sup> Utah's suit, however, was unsuccessful.

As we noted in our May 2004 report on this issue, counting Americans abroad as an integral part of the 2010 Census would be a monumental task that would introduce new resource demands, risks, and uncertainties to an endeavor that was already facing a variety of difficulties.<sup>4</sup> Specific challenges include policy questions such as who should be counted and how should the data be used, as well as logistical difficulties such as ensuring a complete count and verifying U.S. citizenship.

To assess the practicality of counting overseas Americans, the Bureau held a test enumeration from February through July 2, 2004, in France, Kuwait, and Mexico. As agreed with your offices, we assessed (1) whether the Bureau implemented the test consistent with its design, and (2) the initial lessons learned from the test results and their implications for future overseas enumerations.

To address these objectives, we reviewed applicable planning and other documents, and interviewed knowledgeable Bureau officials and representatives of private organizations who helped the Bureau promote the census at the three test sites. Further, to review how the Bureau was implementing the census at the test locations, we made on-site inspections in Paris, France, and Guadalajara, Mexico. We conducted our work from March through July 2004, in accordance with generally accepted government auditing standards.

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## Results in Brief

The Bureau generally implemented the 2004 overseas census test consistent with its research design. Key elements of the Bureau's plan, such as developing a questionnaire specifically for overseas Americans and launching a marketing campaign designed to publicize the test, were generally carried out as planned. Moreover, the test was conducted on schedule.

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<sup>3</sup> Congressional Research Service, *House Apportionment: Could Census Corrections Shift a House Seat?*, RS21638 (Washington, D.C.: Oct. 8, 2003).

<sup>4</sup> GAO, *2010 Census: Overseas Enumeration Test Raises Need for Clear Policy Direction*, GAO-04-470 (Washington, D.C.: May 21, 2004).

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However, the response levels fell far short of what the Bureau planned for relative to the number of questionnaires it printed. For example, although the Bureau printed about 520,000 census forms for the three test sites—France, Kuwait, and Mexico—the actual number of paper responses it received only totaled 1,783, as of the end of the test in early July 2004. Another 3,607 responses were received via the Internet. Further, because of the low response levels, the data were expensive to obtain on a unit cost basis—around \$1,450 per return. In contrast, the unit cost of the 2000 Census was about \$56 per household. Although the 2000 Census costs are not directly comparable to the 2004 overseas test because the 2000 test included operations not used in the overseas test, the 2000 Census was the most expensive census in our nation’s history.

Further, substantially boosting overseas response levels might be infeasible. For example, during the 2000 Census, the Bureau spent \$374 million on a months-long publicity campaign that consisted of television, radio, and other forms of advertising that helped secure a 72-percent return rate. Replicating this level of effort on a worldwide basis would be impractical at best, and would not produce a complete count. Indeed, even after the Bureau’s aggressive publicity effort in 2000, it still needed to follow-up with about 42 million households that did not complete their census forms.

Ensuring a smooth overseas count could also stretch the Bureau’s resources, and thus detract from domestic efforts. For example, at each test site the Bureau encountered various difficulties that needed to be worked out. The difficulties included addressing French privacy laws and delivery problems in Kuwait. Moreover, managing a complex operation from thousands of miles away was also hard. This was particularly evident in the logistical challenges the Bureau had in overseeing the performance of the private firm hired to publicize the census at the three test sites.

The Bureau’s longstanding experience in counting the nation’s population has made it clear that a cost-effective census is assembled from key building blocks that include mandatory participation, a complete and accurate address list, and the ability to follow-up with nonrespondents. The approach the Bureau used to count the overseas population—a voluntary survey that relies heavily on marketing to secure a complete count—largely for reasons of practicality, lacks these building blocks, and it is unlikely that any refinements to this basic design would produce substantially better results. What’s more, the Bureau already faces the difficult task of securing a successful stateside count in 2010. Having to

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count Americans abroad would only add to the challenges facing the Bureau.

Given the obstacles to a cost-effective count of overseas Americans as part of the decennial census, Congress may wish to consider eliminating funding for the research, planning, and development activities related to counting this population group using the Bureau's current approach, including funding for tests planned in 2006 and 2008. However, funding for the evaluation of the 2004 test should continue as planned because it could provide useful data to Congress. Moreover, should Congress determine that a count of overseas Americans might be useful for certain policy-making and other nonapportionment purposes, Congress may wish to consider authorizing and funding research on the feasibility of counting Americans abroad using alternatives to the decennial census.

To facilitate congressional decision making, we recommend that the Bureau, in consultation with Congress, research potential alternatives to the decennial census such as conducting a separate survey, examining how administrative records could be refined to produce a more accurate count of overseas Americans, and exchanging data with other countries' statistical agencies and censuses, subject to applicable confidentiality and other provisions. Once Congress knows the tradeoffs of these various options, it would be better positioned to provide the Bureau with the direction it needs so that the Bureau could then develop and test an approach that meets congressional requirements at reasonable resource levels.

The Secretary of Commerce forwarded written comments from the U.S. Census Bureau on a draft of this report. The comments are reprinted in the appendix.

The Bureau agreed with our conclusions and recommendations. Furthermore, the Bureau noted, "should Congress request and fund" further research on counting overseas Americans, it would be equipped to do that research itself.

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## Background

According to the Bureau, no accurate estimate exists of the total number of Americans living abroad. The Constitution and federal law give the Bureau discretion to decide whether to count American citizens living abroad. In prior censuses, the Bureau has generally included "federally affiliated" groups—members of the military and federal employees and their

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dependents—but has excluded private citizens residing abroad from all but the 1960 and 1970 Censuses. The 2000 Census, using administrative records, found 576,367 federally affiliated Americans residing overseas, including 226,363 military personnel, 30,576 civilian employees, and 319,428 dependents of both groups.

In response to congressional direction and the concerns of various private organizations, the Census Bureau launched a research and evaluation program to assess the practicality of counting both private and federally affiliated U.S. citizens residing abroad. The key part of this effort, the enumeration, took place from February 2004 through July 2, 2004, in France, Kuwait, and Mexico. To promote the overseas census test the Bureau relied on third parties—American organizations and businesses in the three countries—to communicate to their members and/or customers that an overseas enumeration of Americans was taking place and to make available to U.S. citizens either the paper questionnaire or Web site address.

Currently, the Bureau is processing and analyzing the overseas questionnaire data and plans to complete an evaluation of the test results in early 2005. The Bureau estimates that it will have spent approximately \$7.8 million in fiscal years 2003 through 2005 to plan, conduct, and evaluate the 2004 test. The Bureau has requested additional funds for fiscal year 2005 to plan for further testing scheduled for 2006. The Bureau also plans to include overseas testing in the 2008 dress rehearsal if it were to receive the necessary funding.<sup>5</sup>

In May 2004 we reported on the design of the overseas enumeration test and concluded that because of various methodological limitations, the test results will only partially answer the Bureau's key research objectives concerning feasibility (as measured by such indicators as participation and number of valid returns), data quality, and cost. Further, we noted that the Bureau should not decide on its own whether or not to enumerate Americans overseas, and in fact would need congressional guidance on how to proceed. As shown in figure 1, the key decisions facing Congress in this regard include, in addition to the threshold question of whether American residing overseas should be counted, how the data should be

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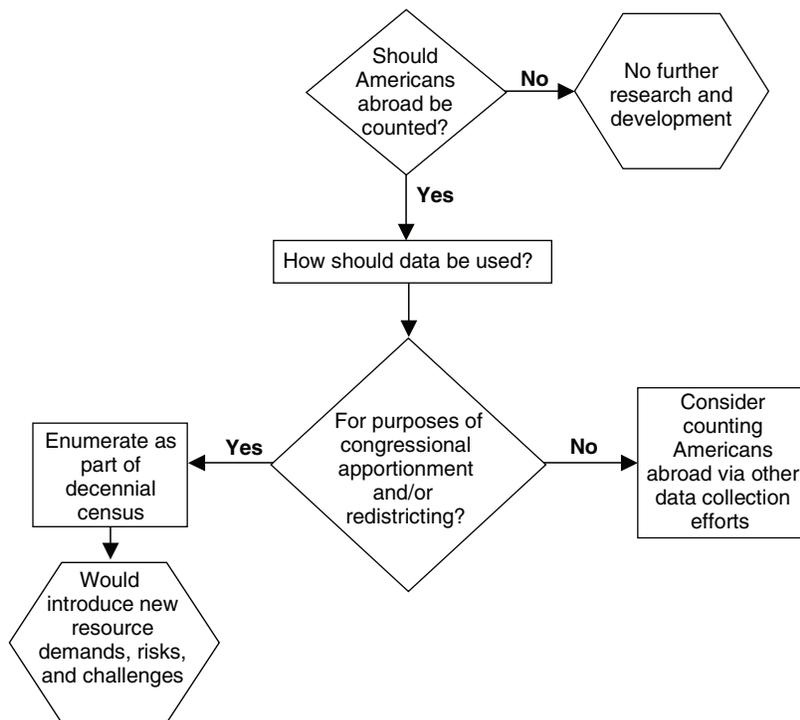
<sup>5</sup> At this point, the Bureau does not have cost data beyond fiscal year 2005. Therefore, it is unknown what the costs will be for implementing and evaluating the 2006 overseas test or the 2008 overseas dress rehearsal.

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used and whether to enumerate this population group as part of the decennial census.

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**Figure 1: Key Decisions Facing Congress on Enumerating Americans Abroad**



Source: GAO analysis.

We also recommended that if further testing were to occur, that the Bureau resolve the shortcomings of the design of the 2004 test and better address the objectives of an overseas enumeration.

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## Scope and Methodology

As agreed with your offices, our objectives for this report were to assess (1) whether the Bureau implemented the test consistent with its design, and (2) the initial lessons learned from the test results and their implications for future overseas enumerations. To assess the first objective, we interviewed Bureau officials and compared the Bureau's test plans with what was actually done at the three test sites. We visited Paris, France, and Guadalajara, Mexico, to obtain the views of 12 private, civic, and other

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organizations on the implementation of the overseas census test, and/or to confirm at 36 organizations the availability of census material. In addition, to a more limited extent, we interviewed officials from third party organizations in Kuwait via the telephone or e-mail. We judgmentally selected these organizations because they had agreed to display census promotional materials and, in some cases, had also agreed to do one or more of the following activities: make available paper copies of the census questionnaire, publish information in a newsletter, post a link to a Web site, send outreach e-mail to members, and/or create speaking opportunities to discuss the census. The results of these visits are not necessarily representative of the larger universe of third-party organizations.

To assess the implications of the test results on future overseas enumerations and the 2010 census, we obtained from Bureau officials preliminary results of the overseas census by test site and response mode as well as cost data. We also interviewed officials from the Bureau and third-party organizations to determine what lessons were learned from the test and the implications on future overseas enumeration efforts.

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## 2004 Overseas Test Was Generally Implemented as Designed

The Bureau's design for the 2004 overseas enumeration test was generally implemented as planned and completed on schedule. The Bureau's design had four key components: the mode of response, the questionnaire designed specifically for Americans living overseas, three test sites, and an outreach and promotion program designed to communicate and educate Americans abroad that a test census was being conducted. Table 1 describes each of these components in greater detail.

**Table 1: Key Components of Overseas Enumeration Were Generally Implemented as Planned**

<b>Key overseas test component</b>	<b>What the Bureau planned</b>	<b>Generally implemented as planned?</b>	<b>GAO observations</b>
Census form response mode	Census questionnaire will be available in paper format or via the Internet.	Yes	Paper version of the census form was available at various locations at the test sites. Questionnaire was available for completion on the Internet. Paper version was also available in Spanish in Mexico.
Census test questions	2000 decennial short form questionnaire will be modified for the overseas enumeration.	Yes	Asked respondents to provide their passport numbers and social security numbers to verify citizenship. Asked respondents about their employment status—military, federal, or other. Asked for information on everyone in the household even if the person was not a U.S. citizen.
Test sites	Conduct test in three geographically diverse areas with large American populations, and where administrative records may be available to help verify results.	Yes	Overseas test was implemented in three countries: France, Kuwait, and Mexico.
Outreach/Promotion	Contract with a public relations firm to develop a communications strategy to inform and motivate respondents living in the selected countries to answer the census.	Yes	Public relations firm hired to develop a communication strategy. Strategy relied on public and private organizations in each of the test sites. Organizations displayed promotional materials about the test, communicated test census to members, and distributed the paper census forms to American residents.

Source: GAO.

However, while the test was generally implemented as designed, our earlier report pointed out several methodological limitations with the design, such as not being able to calculate response rates because the universe of Americans is unknown or not being able to measure the quality of data because of the impracticality of developing an address list. As we discuss later in this report, it is these methodological limitations that impede the Bureau’s ability to implement a successful overseas enumeration.

## Overseas Census Test Results Were Disappointing and Costly

Although the 2004 overseas enumeration test ended in early July 2004 and the Bureau has just begun evaluating the results, the response levels were poor, and very expensive to obtain on a per unit basis. The response level to the overseas enumeration suggests that the current approach to counting overseas Americans—a voluntary survey that relies heavily on marketing to get people to participate—by itself cannot secure a successful head count. Further, obtaining the additional resources needed to produce substantially better results may not be feasible, and still not yield data that are comparable in quality to the stateside enumeration.

## Response Levels Were Disappointing and Costly to Obtain

The 5,390 responses the Bureau received for this test were far below what the Bureau planned for when printing up materials and census forms. While the Bureau ordered 520,000 paper forms for three test sites, only 1,783 census forms were completed and returned. Of these, 35 were Spanish language forms that were made available in Mexico. The remaining 3,607 responses were completed via the Internet. Table 2 below shows the number of census questionnaires that the Bureau printed for each country and the number of responses they actually received in both the paper format and via the Internet.

**Table 2: Comparison of Responses Received for 2004 Overseas Census Test**

Test sites	Number of forms printed for each test site	Number of responses by mode		Total number of responses received
		Paper	Internet	
Mexico	430,000 <sup>a</sup>	869 <sup>b</sup>	1,130	1,999
France	75,000	886	2,219	3,105
Kuwait	15,000	28	258	286
<b>Total</b>	<b>520,000</b>	<b>1,783</b>	<b>3,607</b>	<b>5,390</b>

Source: U.S. Census Bureau.

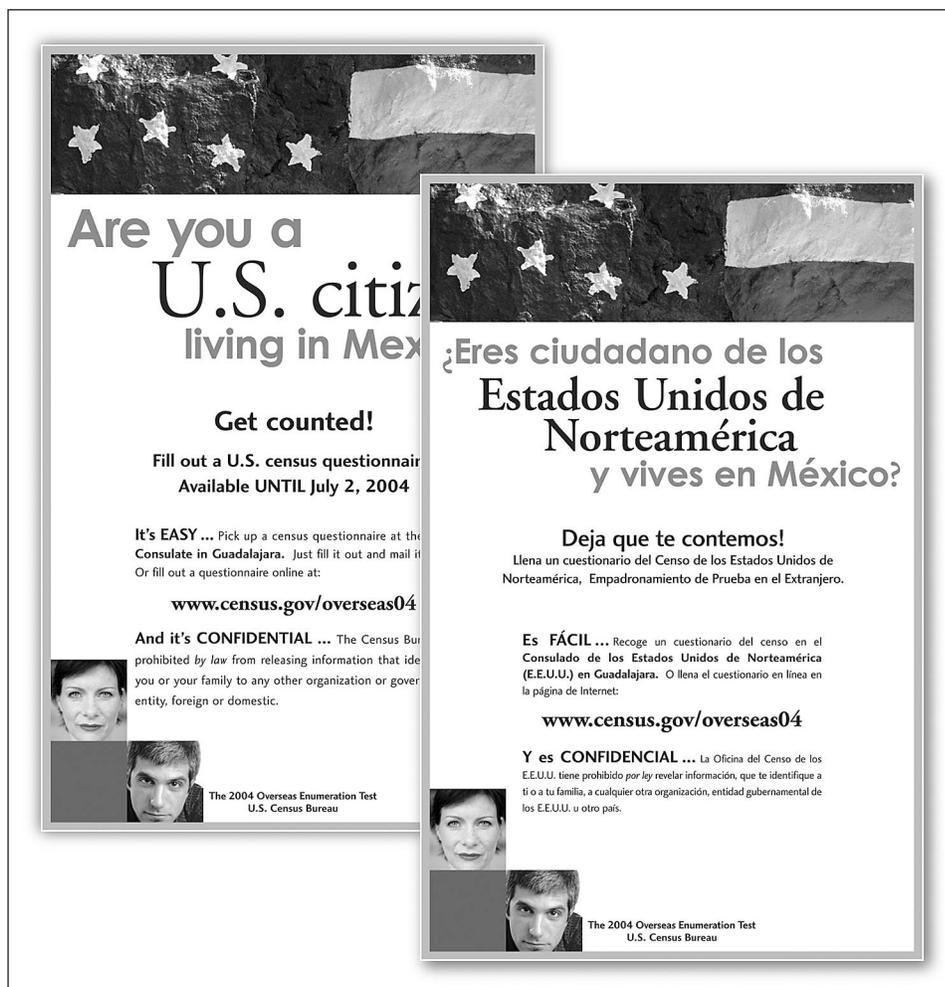
<sup>a</sup>This includes 100,000 forms printed in Spanish.

<sup>b</sup>This includes 35 Spanish forms returned.

Because of the low response levels, in early April 2004, the Bureau reversed its decision to not use paid advertising and in May 2004 initiated a paid advertising campaign in France and Mexico. This included print and

Internet ads in France and print and radio ads in Mexico. See figure 2 for examples of the ads used in the paid advertising campaign.

**Figure 2: Census Bureau Ads Placed in the *International Herald Tribune***



Source: GAO.

A Bureau official told us the ad campaign for the 2004 overseas test cost about \$206,000. This official said there were surplus funds available in the project budget to use for this purpose due to lower than expected processing and postage costs for the overseas test. While the Bureau saw

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some increase in the number of responses after the paid advertising campaign began, this official said the increase was slight.

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### Return on Investment for Overseas Enumeration is Low

Not only were response levels low, they were extremely expensive to obtain on a unit basis—roughly \$1,450 for each returned questionnaire, based on the \$7.8 million the Bureau spent preparing for, implementing, and evaluating the 2004 overseas test. In contrast, the unit cost of the 2000 Census was about \$56 per household. Although the two surveys are not directly comparable because the 2000 Census costs covered operations not used in the overseas test, the 2000 Census was still the most expensive census in our nation’s history.

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### Securing a Higher Return Rate Would Be an Enormous Challenge

The main reason for the high unit cost is the low return rate. However, significantly boosting participation levels may not be feasible. The Bureau’s experience in the 2000 Census highlights the level of effort that was needed to raise public awareness about the census and get people to complete their forms. For the 2000 decennial, the Bureau spent \$374 million on a comprehensive marketing, communications, and partnership effort. The campaign consisted of a five-part strategy conducted in three waves beginning in the fall of 1999 and continuing past Census Day (April 1, 2000). The effort helped secure a 72-percent return rate. Specific elements included television, radio, and other mass media advertising; promotions and special events; and a census-in-schools program. Thus, over a period of several months, the American public was on the receiving end of a steady drumbeat of advertising aimed at publicizing the census and motivating them to respond.

The Bureau also filled 594 full-time partnership specialist positions. These individuals were responsible for mobilizing support for the census on a grassroots basis by working with governmental entities, private companies, and religious and social service groups, and other organizations.

Replicating this level of effort on a worldwide basis would be impractical, and still would not produce a complete count. Indeed, even after the Bureau’s aggressive marketing effort in 2000, it still had to follow-up with about 42 million households that did not return their census forms. Moreover, because there are no reliable figures on the number of Americans residing overseas, the Bureau would not have a good measure of the number of people that did not participate, or the overall quality of the data.

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## Ensuring a Smooth Overseas Enumeration Could Stretch the Bureau's Resources

The Bureau's experience in conducting the 2004 overseas test underscored the difficulties of administering a complex operation from thousands of miles away. Not surprisingly, as with any operation this complex, various challenges and unforeseen problems arose. While the Bureau was able to resolve them, its ability to do so should there be a full overseas enumeration as part of the 2010 Census, would be highly questionable as far more resources would be required. This was particularly evident in at least two areas: grappling with country-specific issues and overseeing the contractor responsible for raising public awareness of the census at the three test sites.

## Country-specific Issues Created Implementation Problems

The Bureau encountered a variety of implementation problems at each of the test sites. In some cases the problems were known in advance, in others, glitches developed at the last minute. Although such difficulties are to be expected given the magnitude of the Bureau's task, a key lesson learned from the test is that there would be no economy of scale in ramping up to a full enumeration of Americans abroad. In fact, just the opposite would be true. Because of the inevitability of country-specific problems, rather than conducting a single overseas count based on a standard set of rules and procedures (as is the case with the stateside census), the Bureau might end up administering what amounts to dozens of separate censuses—one for each of the countries it enumerates—each with its own set of procedures adapted to each country's unique requirements. The time and resources required to do this would likely be overwhelming and detract from the Bureau's stateside efforts.

For example, during the overseas test, the Bureau found that French privacy laws restrict the collection of personal data such as race and ethnic information. However, these data are collected as part of the decennial census because they are key to implementing a number of civil rights laws such as the Voting Rights Act.

Addressing France's privacy laws took a considerable amount of negotiation between the two countries, and was ultimately resolved after a formal agreement was developed. The Bureau issued and posted on its Web site an advisory that informed Americans living in France that it was not mandatory to respond to the questionnaire, the only recipient of the collected data is the Census Bureau, the data will be kept for one year, and the respondent has a right to access and correct the data collected. The Bureau was able to collect race and ethnic data—generally a prohibited practice without the respondents' permission—only after it received

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special approval from a French government agency. Initially, however, it looked as if the Bureau might have to redesign the census form if it wanted to use it in France.

In Kuwait, delivery of the census materials was delayed by several weeks at the beginning of the test because they were accidentally addressed to the wrong contractor. Ultimately, the U.S. Embassy stepped-in to accept the boxes so that the enumeration could proceed. In Mexico, there was some initial confusion on the part of Mexican postal workers as to whether they could accept the postage-paid envelopes that the Bureau had provided to return the paper questionnaires for processing in the United States.

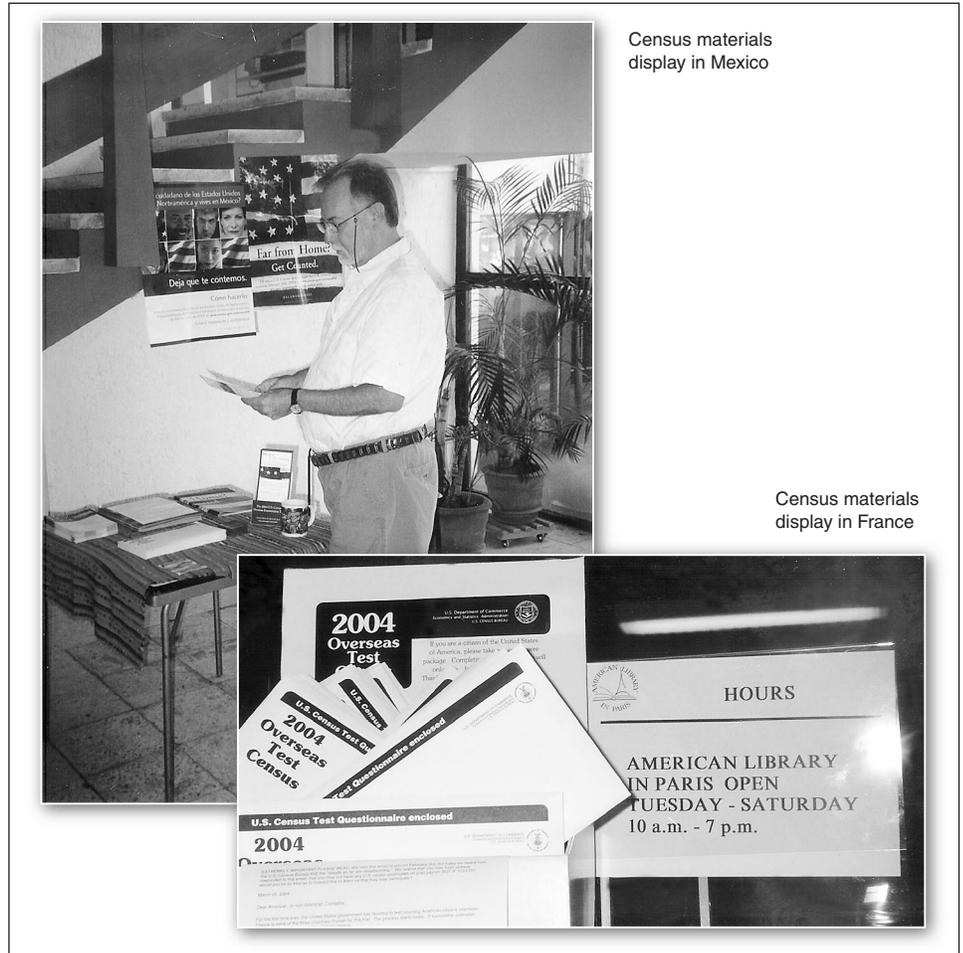
Because of the small number of countries involved in the test, the Bureau was able to address the various problems it encountered. Still, the Bureau's experience indicates that it will be exceedingly difficult to identify and resolve in advance all the various laws, rules, societal factors, and a host of other potential glitches that could affect a full overseas enumeration.

#### On-site Supervision of Contractor Was Problematic

As noted previously, the Bureau hired a public relations firm to develop a communications strategy to inform and motivate respondents living in the test countries to complete the census. The firm's responsibilities included identifying private companies, religious institutions, service organizations, and other entities that have contact with Americans abroad and could thus help publicize the census test. Specific activities the organizations could perform included displaying promotional materials and paper versions of the census questionnaire, publishing information in a newsletter, and posting information on their Web sites. Although the public relations firm appeared to go to great lengths to enlist the participation of these various entities—soliciting the support of hundreds of organizations in the three countries—the test revealed the difficulties of adequately overseeing a contractor operating in multiple sites overseas.

For example, the public relations firm's tracking system indicated that around 440 entities had agreed to perform one or more types of promotional activities. However, our on-site inspections of several of these organizations in Paris, France, and Guadalajara, Mexico, that had agreed to display the census materials and/or distribute the questionnaires, uncovered several glitches. Of the 36 organizations we visited that were supposed to be displaying promotional literature, we found the information was only available at 15. In those cases, as shown in figure 3, the materials were generally displayed in prominent locations, typically on a table with posters on a nearby wall.

**Figure 3: Census Materials Were Prominently Displayed in Various Locations in France and Mexico**



Source: GAO.

Five of these 15 organizations were also distributing the census questionnaire, but the forms were not readily accessible.

However, at 21 sites we visited, we found various discrepancies between what the public relations firm indicated had occurred, and what actually took place. For example, while the firm's tracking system indicated that questionnaires would be available at a restaurant and an English-language bookstore in Guadalajara, none were available. In fact, the owner of the bookstore told us that no one from the Census Bureau or the public

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relations firm had contacted her about displaying materials for the overseas test.

At the University of Guadalajara, although the tracking system indicated that an official had been contacted about, and agreed to help support the census test, that official told us no one had contacted him. As a result, when boxes of census materials were delivered to his school without any explanatory information, he did not know what to do with them, and had to telephone the U.S. Consulate in Guadalajara to figure out what they were for.

Likewise, in Paris, we went to several locations where the tracking system indicated that census information would be available. None was. In fact, at some of these sites, not only was there no information about the census, but there was no indication that the organization we were looking for was at the address we had from the database.

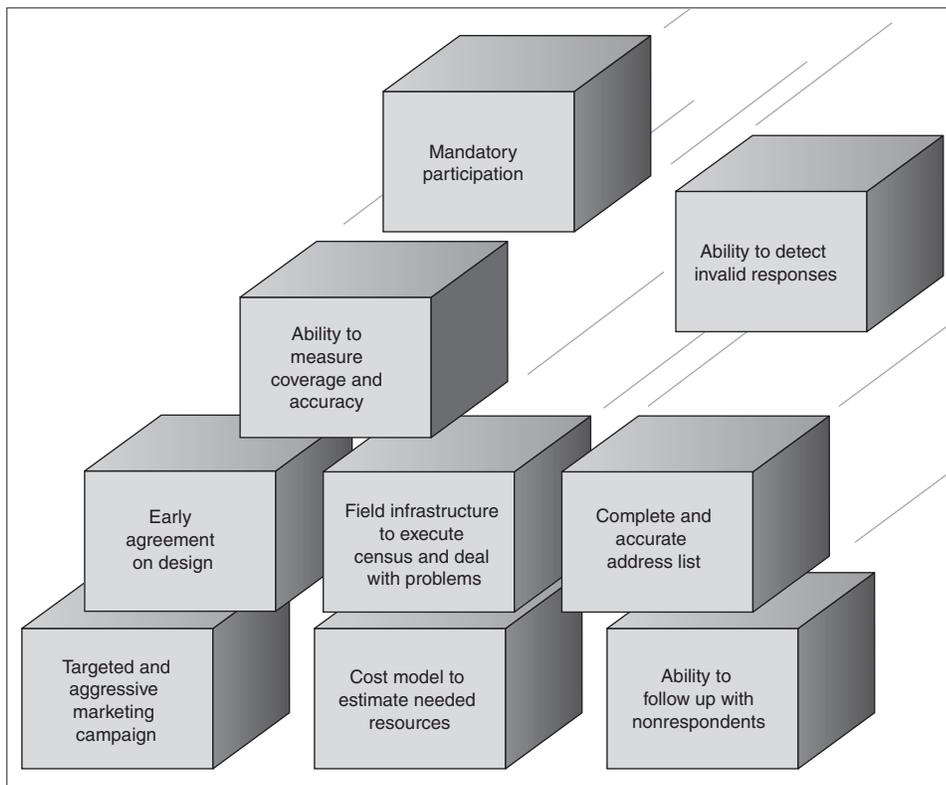
The results of the overseas test point to the difficulties of overseeing the contractor's performance. As census materials were made available at scores of locations across the three test countries, it would have been impractical for the Bureau to inspect each site. The difficulty of supervising contractors—and any field operation for that matter—would only be magnified in a global enumeration.

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## The Design of the Overseas Census Lacks the Building Blocks of a Successful Census

The Bureau's experience in counting the nation's population for the 2000 and earlier censuses sheds light on some of the specific operations and other elements that together form the building blocks of a successful head count (see fig. 4).

**Figure 4: Key Building Blocks of a Successful Census**



Source: GAO.

While performing these activities does not necessarily guarantee a cost-effective headcount, not performing them makes a quality count far less promising and puts the entire enterprise at risk. The current approach to counting overseas Americans lacks these building blocks, as most are infeasible to perform on an overseas population. Each is discussed in greater detail below.

- **Mandatory participation:** Under federal law, all persons residing in the United States regardless of citizenship status are required to respond to the decennial census. By contrast, the overseas enumeration test was conducted as a voluntary survey where participation was optional. The Bureau has found that response rates to mandatory surveys are higher than the response rates to voluntary surveys. This in turn yields more complete data and helps hold down costs.

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- **Early agreement on design:** Both Congress and the Bureau need to agree on the fundamental design of an overseas census. Concurrence on the design helps ensure adequate planning, testing and funding levels. Conversely, the lack of an agreed-upon design raises the risk that basic design elements might change in the years ahead, while the opportunities to test those changes and integrate them with other operations will diminish. Under the Bureau's current plans, after the 2006 test, the Bureau would have just one more opportunity to test its prototype for an overseas enumeration—a dress rehearsal in 2008. Any design changes after 2008 would not be tested in a real-world environment.

The design of the census is driven in large part by the purposes for which the data will be used. Currently, no decisions have been made on whether the overseas data will be used for purposes of congressional apportionment, redistricting, allocating federal funds, or other applications. Some applications, such as apportionment, would require precise population counts and a very rigorous design that parallels the stateside count. Other applications, however, could get by with less precision and thus, a less stringent approach.

As we noted previously, Congress will need to decide whether or not to count overseas Americans, and how the results should be used. The basis for these determinations needs to be sound research on the cost, quality of data, and logistical feasibility of the range of options for counting this population group. Possibilities include counting Americans via a separate survey, administrative records such as passport and voter registration forms, and/or records maintained by other countries such as published census records and work permits.

The Bureau's initial research has shown that each of these options has coverage, accuracy, and accessibility issues, and some might introduce systemic biases into the data. Far more extensive research would be needed to determine the feasibility of these or other potential approaches. Once Congress knows the tradeoffs of these various alternatives, it will be better positioned to provide the Bureau with the guidance it needs to go beyond research and conduct field tests of specific approaches. The Bureau can conduct the research, or it can contract it out. Indeed, the National Research Council of the National Academy of Sciences has conducted a number of studies on the decennial census, including a review of the 2000 Census and an examination of reengineering the 2010 Census.

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- **A complete and accurate address list:** The cornerstone of a successful census is a quality address list. For the stateside census, the Bureau goes to great lengths to develop what is essentially an inventory of all known living quarters in the United States, including sending census workers to canvass every street in the nation to verify addresses. The Bureau uses this information to deliver questionnaires, follow up with nonrespondents, determine vacancies, and identify households the Bureau may have missed or counted more than once. Because it would be impractical to develop an accurate parallel address list for overseas Americans, these operations would be impossible and the quality of the data would suffer as a result.
  - **Ability to detect invalid returns:** Ensuring the integrity of the census data requires the Bureau to have a mechanism to screen out invalid responses. Stateside, the Bureau does this by associating an identification number on the questionnaire to a specific address in the Bureau's address list, as well as by field verification. However, the Bureau's current approach to counting overseas Americans is unable to determine whether or not a respondent does in fact reside abroad. So long as a respondent provides certain pieces of information on the census questionnaire, it will be eligible for further processing. The Bureau is unable to confirm the point of origin for questionnaires completed on the Internet, and postmarks on a paper questionnaire only tell the location from which a form was mailed, not the place of residence of the respondent. The Bureau has acknowledged that ensuring such validity might be all but impossible for any reasonable level of effort and funding.
  - **Ability to follow up with non-respondents:** Because participation in the decennial census is mandatory, the Bureau sends enumerators to those households that do not return their questionnaires. In cases where household members cannot be contacted or refuse to answer all or part of a census questionnaire, enumerators are to obtain data from neighbors, a building manager, or other nonhousehold member presumed to know about its residents. The Bureau also employs statistical techniques to impute data when it lacks complete information on a household. Thus, by the end of each decennial census, the Bureau has a fairly exhaustive count of everyone in the nation. As noted above, because the Bureau lacks an address list of overseas Americans, it is unable to follow up with nonrespondents or impute information on missing households. As a result, the Bureau will never be able to obtain a complete count of overseas Americans.

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- **Cost model for estimating needed resources:** The Bureau uses a cost model and other baseline data to help it estimate the resources it needs to conduct the stateside census. Key assumptions such as response levels and workload are developed based on the Bureau's experience in counting people decade after decade. However, the Bureau has only a handful of data points with which to gauge the resources necessary for an overseas census, and the tests it plans on conducting will only be of limited value in modeling the costs of conducting a worldwide enumeration in 2010.

The lack of baseline data could cause the Bureau to over- or underestimate the staffing, budget and other requirements of an overseas count. For example, this was evident during the 2004 overseas test when the Bureau estimated it would need around 100,000 Spanish-language questionnaires for the Mexican test site. As only 35 Spanish-language questionnaires were returned, it is now clear that the Bureau could have gotten by with printing far fewer questionnaires for Mexico. However, the dilemma for the Bureau is that its experience in the 2004 overseas test cannot be used to project the number of Spanish-language questionnaires it would need for Mexico or other Spanish-speaking countries in 2010. Similar problems would apply to efforts to enumerate other countries.<sup>6</sup>

- **Targeted and aggressive marketing campaign:** The key to raising public awareness of the census is an intensive outreach and promotion campaign. As noted previously, the Bureau's marketing efforts for the 2000 Census were far-reaching, and consisted of more than 250 ads in 17 languages that were part of an effort to reach every household, including those in historically undercounted populations. Replicating this level of effort on a global scale would be both difficult and expensive, and the Bureau has no plans to do so.
- **Field infrastructure to execute census and deal with problems:** The Bureau had a vast network of 12 regional offices and 511 local census offices to implement various operations for the 2000 Census. This decentralized structure enabled the Bureau to carry out a number of activities to help ensure a more complete and accurate count, as well as deal with problems when they arose. Moreover, local census offices are an important source of intelligence on the various enumeration

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<sup>6</sup> The Bureau plans to destroy all unused questionnaires for the 2004 test.

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obstacles the Bureau faces on the ground. For example, during the 2000 Census, the Bureau called on them to identify hard-to-count population groups and other challenges, and to develop action plans to address them. The absence of a field infrastructure for an overseas census means that the Bureau would have to rely heavily on contractors to conduct the enumeration, and manage the entire enterprise from its headquarters in Suitland, Maryland.

- **Ability to measure coverage and accuracy:** Since 1980, the Bureau has measured the quality of the decennial census using statistical methods to estimate the magnitude of any errors. The Bureau reports these estimates by specific ethnic, racial, and other groups. For methodological reasons, similar estimates cannot be generated for an overseas census. As a result, the quality of the overseas count, and thus whether the numbers should be used for specific purposes, could not be accurately determined.

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## Conclusions

The 2004 test of the feasibility of an overseas enumeration was an extremely valuable exercise in that it highlighted the numerous obstacles to a cost-effective count of Americans abroad as an integral part of the decennial census. Although more comprehensive results will not be available until the Bureau completes its evaluation of the test early next year, a key lesson learned is already clear: The current approach to counting this population group—a voluntary survey that largely relies on marketing to ensure a complete count—would be costly and yield poor results. The tools and resources the Bureau has on hand to enumerate overseas Americans are insufficient for overcoming the inherent obstacles to a complete count, and it is unlikely that any refinements to this basic design would produce substantially better results, and certainly not on a par suitable for purposes of congressional apportionment.

What's more, the Bureau already faces the difficult task of carrying out a cost-effective stateside enumeration in 2010. Securing a successful count of Americans in Vienna, Virginia, is challenging enough; a complete count of Americans in Vienna, Austria—and in scores of other countries around the globe—would only add to the difficulties facing the Bureau as it looks toward the next national head count. As a result, we believe that any further tests or planning activities related to counting Americans overseas as part of the decennial census would be an imprudent use of the Bureau's limited resources.

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That said, to the extent that Congress desires better data on the number and characteristics of Americans abroad for various policy-making and other nonapportionment purposes that require less precision, such information does not necessarily need to be collected as part of the decennial census, and could, in fact, be acquired through a separate survey or other means. To help inform congressional decision making on this issue, including decisions on whether Americans should be counted and how the data should be used, it will be important for Congress to have the results of the Bureau's evaluation of the 2004 overseas census test. Equally important would be information on the cost, quality of data, and logistical feasibility of counting Americans abroad using alternatives to the decennial census. Once Congress knows the tradeoffs of these various alternatives, it would be better positioned to provide the Bureau with the direction it needs so that the Bureau could then develop and test an approach that meets congressional requirements at reasonable resource levels.

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## Matters for Congressional Consideration

Given the obstacles to a cost-effective count of overseas Americans as part of the decennial census and, more specifically, obtaining data that is of sufficient quality to be used for congressional apportionment, Congress may wish to consider eliminating funding for any additional research, planning, and development activities related to counting this population as part of the decennial headcount, including funding for tests planned in 2006 and 2008. However, funding for the evaluation of the 2004 test should continue as planned to help inform congressional decision making.

Should Congress still desire better data on the number of overseas Americans, in lieu of the method tested in 2004, Congress might wish to consider authorizing and funding research on the feasibility of counting Americans abroad using alternatives to the decennial census.

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## Recommendations for Executive Action

To facilitate congressional decision making, we recommend that the Secretary of Commerce ensure that the Bureau completes its evaluation of the 2004 overseas census test as planned. Further, to the extent that additional research is authorized and funded, the Bureau, in consultation with Congress, should explore the feasibility of counting overseas Americans using alternatives to the decennial census. Potential options include

- conducting a separate survey,

- 
- examining how the design and archiving of various government agency administrative records might need to be refined to facilitate a more accurate count of overseas Americans, and
  - exchanging data with other countries' statistical agencies and censuses, subject to applicable confidentiality and other provisions.

Consideration should also be given to whether the Bureau should conduct this research on its own or whether it should be contracted out to the National Academy of Sciences.

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## Agency Comments and Our Evaluation

The Secretary of Commerce forwarded written comments from the U.S. Census Bureau on a draft of this report on August 5, 2004, which are reprinted in the appendix. The Bureau agreed with our conclusions and recommendations. Furthermore, the Bureau noted, "should Congress request and fund" further research on counting overseas Americans, it would be equipped to do that research itself.

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As agreed with your offices, unless you release its contents earlier, we plan no further distribution of this report until 30 days from its issue date. At that time we will send copies to other interested congressional committees, the Secretary of Commerce, and the Director of the U.S. Census Bureau. Copies will be made available to others upon request. This report will also be available at no charge on GAO's Web site at <http://www.gao.gov>.

If you or your staff have any questions concerning this report, please contact me on (202) 512-6806 or by e-mail at [daltonp@gao.gov](mailto:daltonp@gao.gov) or Robert Goldenkoff, Assistant Director, at (202) 512-2757 or [goldenkoffr@gao.gov](mailto:goldenkoffr@gao.gov). Key contributors to this report were Ellen Grady, Lisa Pearson, and Timothy Wexler.



Patricia A. Dalton  
Director  
Strategic Issues

# Comments from the Department of Commerce



**THE SECRETARY OF COMMERCE**  
Washington, D.C. 20230

Ms. Patricia A. Dalton  
Director, Strategic Issues  
U.S. Government Accountability Office  
Washington, DC 20548

Dear Ms. Dalton:

The U.S. Department of Commerce appreciates the opportunity to comment on the U.S. Government Accountability Office draft report entitled *2010 Census: Counting Americans Overseas as Part of the Decennial Census Would Not Be Cost-Effective*. The Department's comments on this report are enclosed.

Sincerely,

A handwritten signature in black ink, appearing to read "D. L. Evans".

Donald L. Evans

Enclosure

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**Appendix I**  
**Comments from the Department of**  
**Commerce**

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Comments from the U.S. Department of Commerce  
Regarding the U.S. Government Accountability Office  
Draft Report Entitled *2010 Census: Counting Americans Overseas as Part of the*  
*Decennial Census Would Not Be Cost-Effective*

Thank you for providing us the opportunity to comment on your draft report, *2010 Census: Counting Americans Overseas as Part of the Decennial Census Would Not Be Cost-Effective*.

**Comments on Conclusions:**

We agree with the draft report that the 2004 Overseas Census Test was an extremely valuable exercise that highlighted the numerous obstacles to a cost-effective count of Americans abroad as an integral part of the decennial census.

**Comments on Recommendations for Executive Action:**

- “To facilitate congressional decision-making, we recommend that the Secretary of Commerce ensure that the Bureau completes its evaluation of the 2004 overseas census test as planned.”

*The Census Bureau concurs with this recommendation.*

- “Further, to the extent that further research is authorized and funded, the Bureau, in consultation with Congress, should research the feasibility of counting overseas Americans using alternatives to the decennial census. Potential options include ... a separate survey ... administrative records, and ... [data exchange with other countries]. Consideration should also be given as to whether the Bureau should conduct this research on its own or whether it should be contracted out to the National Academy of Sciences.”

*The Census Bureau is equipped to conduct this research, should Congress request and fund it.*

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