

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CENTER FOR POPULAR DEMOCRACY
ACTION, *et al.*,

Plaintiffs,

v.

BUREAU OF THE CENSUS, *et al.*,

Defendants.

Case No. 19 Civ. 10917 (AKH)

SUPPLEMENTAL DECLARATION OF DEBORAH STEMPOWSKI

I, Deborah Stempowski, make the following Declaration pursuant to 28 U.S.C. § 1746, and state under penalty of perjury that the following is true and correct to the best of my knowledge and belief:

1. I currently serve as the Assistant Director for Decennial Census Programs, Operations and Schedule Management. I have served in that capacity since September 2019. I provide this declaration as a supplement to my previous declaration in this case, dated February 10, 2020. I am knowledgeable and well informed about 2020 Census operations, and I make this declaration based upon my personal knowledge and/or upon information supplied to me in the course of my official duties.

2. It is my understanding that Plaintiffs in this matter, in their Reply in Support of their Motion for a Preliminary Injunction, relied on the GAO report entitled “2020 Census: Initial Enumeration Underway but Readiness for Upcoming Operations is Mixed,” dated February 12, 2020 (“GAO Report”). In this declaration, I provide updated information about the recruiting, partnership, and systems readiness discussions in the GAO Report.

I. Community Partnerships

3. The GAO Report noted that the Census Bureau had hoped to establish approximately 250,000 community partnerships by February 1, 2020 but as of February 4, 2020 had established only 238,982. The GAO Report also noted, however, that any delay “had not affected the number of participating organizations and community partners and that [the Census Bureau was] pleased with the quality of those relationships.”

4. As noted in my colleague Burton Reist’s previously-filed declaration in this matter, as of February 10, 2020, we had already secured over 266,000 local partnerships, which was more than the approximately 257,000 we achieved by the very end of the 2010 Census cycle.

5. On February 24, 2020, the Census Bureau surpassed its target of establishing 300,000 community partners—in advance of the March 1, 2020 target date. As of March 11, 2020, the number of community partners stands at roughly 329,000 and continues to rise.

6. I gather that Plaintiffs in this case have claimed that partnership staff members manage, on average, relationships for 200 organizations each, and that Plaintiffs have not been presented with the qualifications and standards that the Census Bureau uses to manage the partnership program. In fact, the Census Bureau manages the 2020 partnership operation through the Customer Relationship Management (CRM) system, a far more robust database and tracking system than we had in place in 2010. All commitments and events being undertaken by 2020 Census partners are logged in the CRM, and Partnership Specialists use this tool to ensure that they are aware of partner activities, communicating with them as appropriate.

7. As of March 10, 2020, 383,198 partnership commitments have been completed, another 88,306 are confirmed, and 76,290 are being planned for the weeks ahead. This current

total of nearly 550,000 commitments (which grows larger every day) includes events, conferences, meetings, and communications activities. The transparent nature of the CRM tool, combined with a detailed quality assurance plan, allows for up to date tracking of commitments. We have deployed CRM as mobile application so that Partnership Specialists can enter and review information on the go, increasing efficiency in maintaining these vital records. The management capabilities of the CRM are helping us ensure that the over 300,000 partners who have signed on to support the 2020 Census are following through on their pledges to help us conduct a complete and accurate count of the population.

II. Recruiting for Upcoming Operations

8. The Census Bureau's target recruiting goal for 2020 Census field staff is approximately 2.66 million applicants.

9. The Census Bureau monitors recruiting and applicant status on a daily basis. When we originally noticed that we were behind our recruiting target, we quickly took steps to boost recruiting, including increasing the advertising budget, mailing millions of postcards about census job opportunities, activating partners to assist with the recruitment message, and increasing pay rates in areas facing the greatest challenges. These actions were successful and recruitment increased markedly, particularly from December 2019 through February 2020. Indeed, as the GAO Report notes, the Census Bureau "experienced an uptick [in applications] in January and February 2020."

10. As of March 6, 2020, the Census Bureau surpassed the 2.66 million applicant goal. As of March 11, 2020, the number of candidates in the applicant pool stands at 2,718,198 and continues to increase on a daily basis. As of this date, each of the 248 ACOs has multiple applicants for every position they anticipate needing to fill.

11. For the Pawling, New York ACO, we have 4.5 applicants for each position. For the four Brooklyn, New York ACOs, we have between 5.2 and 8.4 applicants for each position.

12. The GAO Report also notes that while the Census Bureau had exceeded its goals for hiring Recruiting Assistants and Office Operations Supervisors as of February 4, 2020, we had not as of that date hired all 9,874 Clerks that we had planned to hire by March 1, 2020. As of February 13, 2020, the Census Bureau reached (and passed) its goal of hiring 9,874 Clerks.

III. Systems Readiness

13. The Census Bureau will utilize 52 IT systems for the 2020 Census. The 52 systems are a combination of new and legacy systems. To manage the development, testing, and deployment of these systems, the Census Bureau organized them into 16 “operational deliveries.” Operational Deliveries is a term we created, recognizing how the various systems interrelate. For example, the operational delivery for self-response includes 25 systems. We test systems within each operational delivery through three phases we call “test readiness review”, “production readiness review”, and “operational readiness review.” Organizing the systems into operational deliveries has enabled the Census Bureau to manage and coordinate multiple phases of testing, and gives us a high confidence that systems that pass through these phases of testing will operate as designed and tested during production.

- The 2020 Census has already successfully implemented over 90% of the planned systems in the field, and only 5 (of 52) systems have not yet been deployed, none of which are part of the operational delivery for self-response. (The final five systems that have not yet been fully tested are not due to be deployed until later in the census cycle, e.g., we have not yet completed testing for our archiving system. These systems are fully on schedule to support 2020 operations; the last of the 52

systems will be deployed in December 2020.) The GAO Report, which reflected information “as of January 2020,” stated that five Operational Deliveries were “at risk” of not meeting planned milestones. This is no longer the case. As of today’s date, each of the five Operational Deliveries noted by the GAO as being “at risk” of meeting milestones is on track for completing testing and supporting operations on schedule.

- Our original intent when building two separate applications for Internet Self-Response (ISR) was to have one available as a contingency should the other encounter significant difficulties during 2020 Census preparations or operations. During final testing in the fall of 2019, teams confirmed that both Primus and ECaSE applications that we designed for ISR were capable of providing secure and effective internet self-response capabilities, and both exceeded the expected internet self-response user load. Teams tested each application at up to five times the estimated internet self-response user load of 120,000 concurrent users in order to understand the performance limitations. Results showed that ECaSE ISR permitted 300,000–400,000 concurrent users (three times the estimated load), while Primus reached and exceeded the performance target of 600,000 concurrent users (five times the estimated load). Although both systems vastly exceeded our anticipated user load, we decided to select Primus for use as the primary system and ECaSE ISR as the secondary system given the superior degree to which Primus was able to exceed the anticipated user load.
- The GAO Report also noted “several issues during the testing of two systems expected to be used to conduct non-response follow-up – the enumeration

application and the Sampling, Matching, Reviewing, and Coding system.” For both systems, outstanding issues have been assessed for severity and prioritized. For all high-priority issues, we have developed fixes and as of the data of this declaration are on schedule to have them ready in time for the deployment.

- The GAO Report also mentions a need for contingency and incident response plans and notes that one contingency plan was not finalized. This is no longer the case; all such plans have now been finalized.¹ GAO has issued 112 recommendations related to the 2020 Census. As of today’s date, only 28 recommendations remain open. For 21 of these recommendations, the Census Bureau has implemented actions and provided documentation. We are awaiting GAO’s feedback on whether it accepts our recommendations; we do not believe that further action is necessary on our part.
- Of the seven remaining recommendations, (a), one will be implemented post-2020 with the planning for the 2030 Census; (b) five recommendations are new recommendations issued in October 2019 and the Census Bureau is fully on schedule to address them as appropriate in time for the GAO’s April 2020 deadline for the Census Bureau to provide action plans; and (c) in the case of the final recommendation, Census Bureau has implemented actions and provided

¹ As the GAO notes in its report, the Census Bureau had already successfully addressed contingency planning recommendations by our own Inspector General by the time of the GAO Report. As also noted in the GAO Report, the Census Bureau has developed a plan to address mis- and disinformation in social media. Specifically, the Census Bureau has put in place a Trust and Safety Team in our Communications Directorate to handle misinformation and disinformation about the 2020 Census. The first of its kind in the federal government, this cross-functional network of experts works to proactively combat mis- and disinformation, rapidly respond to identified cases of mis- and disinformation, and amplify accurate and up-to-date information to the public.

GAO with documentation. Although the GAO has requested additional information about this final recommendation, it does not deal with system readiness in any way and the continued dialogue with GAO on this topic will not hinder the effectiveness or timing of the 2020 Census.

Executed on this 11th of March 2020.

A handwritten signature in dark ink, appearing to read 'D Stempowski', is written over a horizontal line.

Deborah Stempowski
Assistant Director for Decennial Census Programs,
Operations and Schedule Management
Bureau of the Census