

October 9, 2019

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Office of Information and Regulatory Affairs  
Office of Management and Budget  
Washington, DC

*Submitted electronically through [www.regulations.gov](http://www.regulations.gov)*

**Re: 2020 Census – Evaluations and Experiments (OMB Control No. 0607-1006, Docket No. OMB-2018-0004)**



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The American Civil Liberties Union (“ACLU”) writes to comment on the 2020 Census Information Collection Request (“ICR”) submission for Office of Management and Budget (“OMB”) review, as detailed in the 2020 Census Federal Register Notice published at 84 FR 47233 (Sept. 9, 2019). Specifically, the ACLU has serious concerns regarding the plan detailed in “Supporting Statement A for Information Collection Request 2020 Census—Evaluations and Experiments” (the “Supporting Statement”) concerning the production of a block-level citizen voting age population (“CVAP”) file.<sup>1</sup>

The Census Bureau submitted the Supporting Statement in conjunction with the ICR. The Supporting Statement addresses the Bureau’s 2020 Census Redistricting Data Program, or “RDP.” The Bureau implements RDP to fulfill its duty under Public Law 94-171 to work with “officers or public bodies [responsible] for the legislative apportionment or districting of each State”<sup>2</sup> and “provide [needed] redistricting data” within a year of Census Day.<sup>3</sup> Consistent with that obligation, the 2020 Census RDP aims to provide to each state “legally[] required redistricting data tabulations by . . . April 1, 2021.”<sup>4</sup>

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<sup>1</sup> Dep’t of Commerce, U.S. Census Bureau, OMB Information Collection Request, 2020 Census, OMB Control Number 0607-1006 (Sept. 9, 2019), 2020 Census Part A\_EAE, (September 9, 2019), at 40-41, available at [https://reginfo.gov/public/do/PRAViewDocument?ref\\_nbr=201909-0607-001](https://reginfo.gov/public/do/PRAViewDocument?ref_nbr=201909-0607-001).

<sup>2</sup> 13 U.S.C. § 141(c).

<sup>3</sup> *Id.*

<sup>4</sup> *See supra note 1, at 40–41.*

According to the Supporting Statement, “the Census Bureau will proceed with the prototype file design”—the design created as part of the Providence, Rhode Island end-to-end test in 2018—“as the design for the 2020 Census.”<sup>5</sup> This design for the P.L. 94-171 does not contain CVAP data.<sup>6</sup> An earlier version of the Supporting Statement, published July 3, 2019, stated that “the Census Bureau [would] make a design change to include citizenship as part of [RDP] data,” *if* “stakeholders indicated a need for tabulations of citizenship data on the 2020 Census [RDP] File.”<sup>7</sup> “That new design would then be published in the Federal Register after it is completed in the summer of 2019.”<sup>8</sup>

The Supporting Statement submitted September 9, 2019, states that “no stakeholders” have “request[ed] citizenship data on the 2020 Census P.L. 94-171 Redistricting Data File.”<sup>9</sup> Under the terms of the previous July 3 version of the Supporting Statement, then, the Census Bureau should not have further plans to make design changes to the 2020 Census P.L. 94-171 to add citizenship data. Despite the apparent lack of interest from states in obtaining citizenship data for redistricting purposes, however, the Supporting Statement states that the Census Bureau will proceed to publish citizenship data “at the block level and prior to the April 1, 2021 deadline.”<sup>10</sup> Earlier statements from the Census Bureau suggest that the purpose of producing this data product is so that “states may use [it] in redistricting.”<sup>11</sup>

The ACLU strongly urges OMB to set conditions on the approval of the ICR prohibiting the creation or dissemination to states of a block-level CVAP file. The single well-understood purpose of block-level CVAP data in the redistricting process is to dilute Hispanic political power by excluding non-citizens—many of whom live in largely Hispanic communities. The Census Bureau should not facilitate this

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<sup>5</sup> *Id.* at 41.

<sup>6</sup> Federal Register, Vol. 83, No. 144 pp. 35458–35460 (July 26, 2018); *see also* “Decennial Census P.L. 94-171 Redistricting Data,” available at <https://www.census.gov/programs-surveys/decennial-census/about/rdo/summary-files.html>.

<sup>7</sup> Paperwork Reduction Act Program, Information Collection Request 2020 Census – Enumeration Operations OMB Control Number 0607-1006, Department of Commerce and U.S. Census Bureau, 2020-Census-Supporting-Statement-A-Revised-July (July 3, 2019), at 43–44, *available at* <https://www.documentcloud.org/documents/6192581-2020-Census-Supporting-Statement-ARevised-July.html#document/p18/a512146>.

<sup>8</sup> *Id.* at 44.

<sup>9</sup> *See supra* note 1, at 41.

<sup>10</sup> *Id.*

<sup>11</sup> *See supra* note 7, at 18.

discriminatory and unlawful goal. Moreover, significant data limitations on block-level CVAP make it inappropriate to use that data in state-level redistricting.

If the Bureau releases citizenship data as part of its RDP file despite the well-known improper racial and partisan uses for that information, it should nonetheless precondition approval on compliance with the Paperwork Reduction Act, E-Government Act of 2002, and Privacy Act by the agencies providing data to the Census Bureau for creation of this file.

### **I. Racial and Partisan Purposes Motivate the Block-Level CVAP File’s Creation.**

Lack of stakeholder requests for the inclusion of citizenship data to the RDP file is telling—and unsurprising. Citizenship data does not now afford (nor has it ever supplied) the relevant touchstone for redistricting. “States use *total-population numbers* from the census when designing congressional and state-legislative districts.”<sup>12</sup> This practice is rooted in the constitutional directive that representatives must be “apportioned among the several States” based on “the *whole number of persons* in each State.”<sup>13</sup> It also “promotes equitable and effective representation” by “ensuring that each representative is subject to requests and suggestions from the same number of constituents.”<sup>14</sup>

The only *known* purpose for providing the states with block-level citizenship data to accompany the RDP file is discriminatory and unlawful. In the course of recent litigation over the inclusion of a citizenship question in the decennial census, plaintiffs obtained evidence showing that the late Dr. Thomas Hofeller, a prominent redistricting specialist, conducted a study on the “political and demographic effects” of using CVAP instead of total population (“TPOP”) to reach equal population in redistricting.<sup>15</sup> In the resulting study, Hofeller concluded that the use of CVAP as the population base for redistricting “would be advantageous to Republicans and Non-Hispanic Whites” and would consequently “provoke a high degree of resistance from Democrats and the major minority groups in the nation.”<sup>16</sup> Hofeller explained

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<sup>12</sup> *Evenwel v. Abbott*, 136 S. Ct. 1120, 1124 (2016) (emphasis added).

<sup>13</sup> U.S. Const. amend. XIV, § 2 (emphasis added).

<sup>14</sup> *Evenwel*, 136 S. Ct. at 1132; *see also Wesberry v. Sanders*, 376 U.S. 1, 18 (1964) (citing “Constitution’s plain objective of making equal representation for equal numbers of people the fundamental goal for the House of Representatives”).

<sup>15</sup> *See* Ex. A to Letter Motion to Show Cause at 55–63, *State of New York v. Dep’t of Commerce*, No. 1:18-cv-2921-JMF, Dkt. No. 587-1 (S.D.N.Y. May 30, 2019), *available at* <https://www.documentcloud.org/documents/6077735-May-30-2019-Exhibit.html#document/p63/a504019>.

<sup>16</sup> *Id.* at 63.

that the strategy—which he described as a “radical departure” from redistricting norms<sup>17</sup>—would allow Republican mapmakers to pack more Latino voters into drawn districts and could be effectively used to dilute the voting clout of heavily Latino areas.<sup>18</sup>

One district court has already concluded that using CVAP instead of TPOP with the aim of “diluting Hispanics’ political power” would be a plainly discriminatory action.<sup>19</sup> In doing so, it traced a direct line between the racial and political origins of this strategy, and efforts by the current Administration to provide block-level CVAP data to the states. OMB should decline to allow the non-partisan Census Bureau to be used as a tool for facilitating discriminatory efforts to benefit “Republicans and Non-Hispanic Whites,”<sup>20</sup> purposefully harming the representational equality of Latinos.

## **II. The Block-Level CVAP File’s Significant Data Limitations Make It Inappropriate For Use in State-Level Redistricting.**

The Census Bureau plans to create a CVAP data product using administrative data, such as data from the Social Security Administration and potentially data from other sources, including U.S. Citizenship and Immigration Services (“USCIS”).<sup>21</sup> But there are known shortcomings in citizenship data derived from Administrative Records.

Known limitations of the Social Security Administration’s “Numident” data are illustrative. Numident “is the most complete and reliable administrative record source of citizenship data currently available to the Census Bureau.”<sup>22</sup> But it is far from accurate to a degree appropriate for redistricting use, as Chief Scientist and Associate Director for Research and Methodology John M. Abowd recently explained in a memorandum to Secretary Wilbur Ross.<sup>23</sup> Notably, Dr. Abowd explained that

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<sup>17</sup> *Id.* at 62.

<sup>18</sup> *See generally id.*

<sup>19</sup> *See La Unión Del Pueblo Entero v. Ross*, 382 F. Supp. 3d 393, 400 (D. Md. 2019).

<sup>20</sup> *See supra* note 15, at 63.

<sup>21</sup> John M. Abowd and Victoria Velkoff, U.S. Census Bureau, “Update on Disclosure Avoidance and Administrative Data” at 12–16 (Sept. 13, 2019), <https://www2.census.gov/cac/sac/meetings/2019-09/update-disclosure-avoidance-administrative-data.pdf>.

<sup>22</sup> J. David Brown, et al., Understanding the Quality of Alternative Citizenship Data Sources for the 2020 Census at 12, U.S. Census Bureau, Center for Economic Studies (Aug. 2018).

<sup>23</sup> *See* Memorandum from John M. Abowd, Chief Scientist & Assoc. Dir. for Research & Methodology, U.S. Census Bureau to Wilbur Ross, Sec’y, U.S. Dep’t of Commerce (Mar. 1, 2018), available at [https://www.supremecourt.gov/DocketPDF/18/18-966/91016/20190306200155135\\_18-966%20Commerce%20J.A.pdf](https://www.supremecourt.gov/DocketPDF/18/18-966/91016/20190306200155135_18-966%20Commerce%20J.A.pdf).

there are questions on how promptly naturalization changes are updated in the Numident file, such that it would accurately reflect naturalized citizens.<sup>24</sup> And USCIS data cannot fully bridge these data gaps, because, among other things, it categorically does “not cover naturalizations occurring before 1988,” omits “some between 1988-2000,” and does not “always cover children under 18 at the time a parent became a naturalized U.S. citizen.”<sup>25</sup> Reliance on this data, therefore, would compromise the accuracy of the redistricting process.

In addition, as a recent *Science Magazine* article detailed, the “technical challenges” for creating such a file “are enormous.”<sup>26</sup> Dr. Abowd recently admitted that the Bureau does not even yet “understand what the expectations are about that product,” despite needing such an understanding to create the file.<sup>27</sup> And the challenge of protecting the confidentiality of individual data under Title 13 magnifies the problems with creating a block-level CVAP file. This holds particularly true at a time when the Bureau is adopting a new technique called “differential privacy” that will attempt to provide even greater privacy protections than those used in the past to prevent unmasking of personal data.<sup>28</sup> Because many census blocks contain few people or few non-citizens, creation of a block-level CVAP file will result in either privacy threats to individuals and families, or the need to mask the data to such a degree that any block-level CVAP figures have high degrees of error. In the likely event of the collision between the Census Act’s privacy protections and creating a data product for states that do not appear to have requested it, the decision should be clear.

### **III. There Is No Reason To Produce The Data Given The Lack of Interest From Stakeholders.**

The Census Bureau has not previously produced CVAP data on the block-level.<sup>29</sup> There is no reason for it to do so now for the first time, particularly given the lack of apparent interest from state stakeholders.

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<sup>24</sup> *See id.* at 154–55 (page numbers refer to pdf linked above).

<sup>25</sup> *Id.*

<sup>26</sup> Jeffery Mervis, “Why the U.S. Census Bureau could have trouble complying with Trump’s order to count citizens,” *Science Mag.* (Sept. 16, 2019), *available at* <https://www.sciencemag.org/news/2019/09/why-us-census-bureau-could-have-trouble-complying-trump-s-order-count-citizens>.

<sup>27</sup> *Id.*

<sup>28</sup> *Id.*

<sup>29</sup> Currently, using data from the American Community Survey, the Census Bureau reports citizenship data only down to the block-group level. *See* Census Bureau, “American Community

On December 28, 2018, the Bureau posted a proposal to the Federal Register representing that the Bureau would “make a design change to include citizenship as part of” the RDP data file, “[i]f . . . stakeholders indicate a need for tabulations of citizenship data on the 2020 Census [RDP].”<sup>30</sup> And as noted above, on July 3, 2019, the Census Bureau again indicated that it would make design changes to the P.L. 94-171 if stakeholders requested them.<sup>31</sup>

The recent Supporting Statement clarifies that no such requests were lodged.<sup>32</sup> And there is nothing in any of the materials released by the Census Bureau, including the recent Supporting Statement, to indicate that any state has requested that the Census Bureau produce any data with block-level CVAP data for the purpose of redistricting. Evidently, states saw no such need for citizenship data tabulations. The Bureau should credit their silence and refrain from producing block-level citizenship data to accompany the RDP file.

#### **IV. Lack of Compliance with the Paperwork Reduction Act, E-Government Act of 2002, and Privacy Act**

OMB should also condition the grant of an ICR on the disavowal of the creation of the CVAP file because a number of prerequisite steps mandated by the Paperwork Reduction Act (“PRA”), E-Government Act of 2002, and Privacy Act have not been completed (or it appears even started). At an absolute minimum, OMB should condition approval upon proper reporting about and completion of each of the steps listed in the conditions section below.

In a presentation given as part of the Census Bureau’s Scientific Advisory Committee meeting, Dr. Abowd and Associate Director for Demographic Programs Victoria Velkoff listed the specific administrative data sources that the Bureau may use to create the CVAP file.<sup>33</sup> Specifically, the presentation listed the following sources:

- Social Security Administration NUMIDENT

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Survey 5-Year Data (2009-2017),” *available at* <https://www.census.gov/data/developers/data-sets/acs-5year.html>.

<sup>30</sup> See 83 FR 67213, 67221 (Dec. 28, 2018) (emphasis added).

<sup>31</sup> See *supra* note 7.

<sup>32</sup> See *supra* note 1, at 41.

<sup>33</sup> John M. Abowd & Victoria Velkoff, U.S. Census Bureau, “Update on Disclosure Avoidance and Administrative Data” at 12–16 (Sept. 13, 2019), *available at* <https://www2.census.gov/cac/sac/meetings/2019-09/update-disclosure-avoidance-administrative-data.pdf>.

- Individual Taxpayer Identification Numbers
- IRS 1040 and 1099 forms
- CMS Medicare and Medicaid/CHIP
- Housing and Urban Development: Federal Housing Administration, Public and Indian Housing Information Center, Tenant and Rental Assistance Certification System, Low-income Housing Tax Credits, Computerized Homes Underwriting Management System
- Department of Homeland Security via USCIS/CBP/ICE: Lawful permanent residents and naturalization data (CIS), visas (ICE), arrival/departure (CBP)
- Department of State (Passport Services): Passport data
- Social Security Administration: Master beneficiary record
- Indian Health Service: Patient registration
- Department of Justice: U.S. Marshals and Citizenship and Immigration Data Collection

Most, if not all, of these data sources are the result of data collections for which agencies must satisfy various preconditions that seek to reduce respondent burden and protect individual privacy. But *none* of the collecting agencies have even begun the process to update Information Collection Requests, conduct updated Privacy Impact Assessments, or issue updated System of Records Notices. This raises serious concerns: the sensitive citizenship data contained in these records will be used for a novel purpose after (what will at best be) a compressed process to comply with privacy laws. If the citizenship data described in the Supporting Statement is released to accompany the RDP file, OMB should condition its release on compliance with the following laws.

#### **a. Paperwork Reduction Act**

The PRA directs agencies to pursue Information Collection Requests (“ICR”) for any “collection of information.”<sup>34</sup> This process requires a systematic assessment of the data collection, public notice and comment, and OMB approval. In relevant part, a covered information collection includes “obtaining, causing to be obtained, soliciting, or requiring the disclosure to third parties or the public, of facts or opinions by or for an agency, regardless of form or format, calling for . . . answers to identical questions posed to, or identical reporting or recordkeeping requirements imposed

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<sup>34</sup> 44 U.S.C. § 3506.

on, ten or more persons, other than agencies, instrumentalities, or employees of the United States.”<sup>35</sup> This covers most, if not all, of the information collection activities used to form the databases proposed for use in constructing the new CVAP file, as indicated from even a cursory survey of current ICRs for these data points.<sup>36</sup>

But even with a current ICR, an agency must undergo the same approval process if it “materially revises” the ICR.<sup>37</sup> Changing the use of the data collected serves as more than a ministerial or technical change to the ICR—indeed, the PRA specifically requires a “description of the need for the information and *the proposed use* of the information.”<sup>38</sup> The added use of personal citizenship data to potentially allow states to cull their redistricting population base can hardly be considered merely “ministerial” or “technical.” Nor does requiring each agency undergo a revised ICR process serve merely formalistic ends. The Census Bureau does not mention a single state stakeholder that has requested a new, block-level CVAP file.<sup>39</sup> That alone undercuts the “need” for this information.

The failure of any agency that provides personal data for use in creating a block-level CVAP file to comply with the updated PRA process should itself prevent the creation of such file, or at least require the agencies complete the revised PRA process first.

### **b. E-Government Act of 2002**

Section 208 of the E-Government Act seeks to “ensure sufficient protections for the privacy of personal information as agencies implement citizen-centered electronic Government.”<sup>40</sup> To that end, it directs an agency to conduct a Privacy Impact Assessment (“PIA”) in certain situations. The PIA must describe the information to be collected, the reason for its collection, its “intended use,” “with whom the

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<sup>35</sup> 44 U.S.C. § 3502(3).

<sup>36</sup> See also *United States v. Particle Data, Inc.*, 634 F. Supp. 272, 275 (N.D. Ill. 1986) (noting that IRS Form “is an ‘information collection request’ within the PRA”).

<sup>37</sup> See 44 U.S.C. § 3507(a) (prohibiting an agency from collecting information unless it undertakes the ICR approval process “in advance of the . . . revision of the collection of information”); see also Office of Info. & Reg. Affairs, Office of Mgmt. & Budget, “FAQ: ICR Dashboard,” [https://www.reginfo.gov/public/jsp/Utilities/faq.myjsp#icr\\_dashboard](https://www.reginfo.gov/public/jsp/Utilities/faq.myjsp#icr_dashboard) (distinguishing between an ICR revision, which requires public comment and OIRA approval, and “requests for non-material or non-substantive changes to currently approved information collections” which are “technical or ministerial”).

<sup>38</sup> 44 U.S.C. § 3507(a)(1)(D)(III) (emphasis added).

<sup>39</sup> See *supra* note 1, at 41.

<sup>40</sup> E-Government Act of 2002, Pub. L. No. 107-347, 116 Stat. 2899 § 208(a) (codified at 44 U.S.C. § 3501).

information will be shared,” and the “notice or opportunities for consent.”<sup>41</sup> Even a cursory search makes plain that most—if not all—of the databases the Census Bureau will use for CVAP block-level data implicate personal records and data within the scope of the PIA requirement.<sup>42</sup>

An agency must conduct a PIA not only when it initiates a new collection of information,<sup>43</sup> but also “where a system change creates new privacy risks.”<sup>44</sup> As an example, OMB guidance lists “[n]ew Interagency Uses”—described as “when agencies work together on shared functions involving significant new uses or exchanges of information in identifiable form”<sup>45</sup>—as a system change requiring a new or updated PIA.<sup>46</sup> The proposed use of citizenship information from each of the agencies at issue is precisely such a change. None of the datasets have been used to build a block-level CVAP file before, and according to the Abowd/Velkoff presentation, the Census Bureau has never even used some of them for citizenship purposes at all.

Given the importance of providing opportunities for those affected by having their personal information used for a new and unprecedented purpose, the Bureau should not be allowed to use such data for a new CVAP file without—at a minimum—the relevant agencies producing updated PIAs.

### **c. Privacy Act**

The Privacy Act of 1974 largely focuses on how an agency uses a “system of records,” which it defines as a “group of any records under the control of any agency from which information is retrieved by the name of the individual or by some identifying number, symbol, or other identifying particular assigned to the

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<sup>41</sup> *Id.* § 208(b)(2)(B)(ii).

<sup>42</sup> *See, e.g.*, <https://www.state.gov/privacy-impact-assessments-privacy-office/> (linking to several PIAs concerning passport data); <https://www.hud.gov/sites/documents/LIHTC.PDF> (PIA for Low-Income Housing Tax Credits); <https://www.hhs.gov/sites/default/files/cms-medicand-chip-program-system.pdf> (PIA for Medicaid and CHIP program system); [https://www.ihs.gov/sites/privacyact/themes/responsive2017/display\\_objects/documents/pia/IHSNationalPatientInformationReportingSystemNPIRS.pdf](https://www.ihs.gov/sites/privacyact/themes/responsive2017/display_objects/documents/pia/IHSNationalPatientInformationReportingSystemNPIRS.pdf) (Indian Health Service PIA for National Patient Information Reporting System).

<sup>43</sup> E-Government Act of 2002, Pub. L. No. 107-347, 116 Stat. 2899 § 208(b)(1)(A)–(B) (codified at 44 U.S.C. § 3501).

<sup>44</sup> Joshua B. Bolten, Director, “M-03-22, OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002” (Sept. 26, 2003) at Attachment A, II.B.b., *available at* [https://obamawhitehouse.archives.gov/omb/memoranda\\_m03-22/#5](https://obamawhitehouse.archives.gov/omb/memoranda_m03-22/#5).

<sup>45</sup> *Id.* at Attachment A, II.B.b.7.

<sup>46</sup> *Id.*

individual.”<sup>47</sup> When an agency seeks to establish or revise a system of records, it must publish a System of Records Notice (“SORN”), which includes “each routine use of the records contained in the system, including the categories of users and the purpose of such use.”<sup>48</sup> Additionally, it must “publish in the Federal Register notice of any new use or intended use of the information in the system” 30 or more days prior to the new use and “provide an opportunity for interested persons to submit written data, views, or arguments to the agency.”<sup>49</sup>

Using individual records and systems of records from these other agencies to create a new data product that includes publishing “citizenship data . . . at the block level and prior to the April 1, 2021 deadline” constitutes a “new use” that should trigger each affected agency to begin and complete a new SORN process.<sup>50</sup> And even a quick search of some of the relevant agencies’ prior SORNs reveal that the databases the Census Bureau proposes to use in creating the CVAP file implicate systems of records under the Privacy Act.<sup>51</sup>

As with the PRA and Privacy Act, each agency whose records will be used as part of the CVAP file must undergo a new SORN process in light of this unprecedented new use of personal data.

## Conclusion

Because no state appears to have requested a new block-level CVAP file for redistricting—and the only known use for the data is unlawful and discriminatory—the Census Bureau should abandon its attempt to create such a file. If OMB declines to do so, however, it should nonetheless precondition approval by requiring:

- The Census Bureau to report each specific data source it intends to use in creating the block-level CVAP file;
- Each affected agency to—

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<sup>47</sup> 5 U.S.C. § 552a(a)(5).

<sup>48</sup> 5 U.S.C. § 552a(e)(4).

<sup>49</sup> 5 U.S.C. § 552a(e)(11).

<sup>50</sup> See *supra* note 1, at 41.

<sup>51</sup> See, e.g., <https://www.hhs.gov/foia/privacy/sorns/ihs-sorns.html> (SORNs regarding Indian Health patient records); <https://www.dhs.gov/system-records-notices-sorns> (SORNs covering naturalization, visa, arrival/departure data); <https://www.federalregister.gov/documents/2015/03/24/2015-06691/privacy-act-system-of-records-passport-records-state-26> (Department of State passport records SORN); <https://www.ssa.gov/privacy/sorn.html> (SORNs covering master-beneficiary file).

- Explain if the records or data that the Census Bureau will use is subject to: (a) Paperwork Reduction Act preclearance via an ICR; (b) a PIA under the E-Government Act of 2002; (c) a SORN under the Privacy Act;
- For each set of records and data that will be used for the CVAP file that are subject to the requirements above, providing an accounting of whether the current ICRs, PIAs, and SORNs account for this new use and, if not, require each agency to conduct a updated notice and process that addresses this new data use; and
- Allow each agency to complete the necessary processes before then allowing the use of the requested data in a CVAP file.

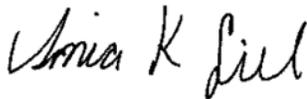
Sincerely,



Ronald Newman  
National Political Director



Adriel I. Cepeda Derieux  
Staff Attorney  
Voting Rights Project



Sonia Gill  
Senior Legislative Counsel



Davin Rosborough  
Staff Attorney  
Voting Rights Project