
Evaluation of the Methodology the Census Bureau Used to Select the Test Sites for the 2026 Census Test

REPORT NO. OIG-26-012-I

MARCH 16, 2026





March 16, 2026

MEMORANDUM FOR: George M. Cook
Chief of Staff, performing the nonexclusive functions and
duties of the Director
U.S. Census Bureau

A handwritten signature in black ink, appearing to read "Arthur L. Scott Jr." with a stylized flourish at the end.

FROM: Arthur L. Scott Jr.
Assistant Inspector General for Audit and Evaluation

SUBJECT: *Evaluation of the Methodology the Census Bureau Used to
Select the Test Sites for the 2026 Census Test*
Report No. OIG-26-012-I

Attached is the final report on our evaluation of the methodology the U.S. Census Bureau used to select the test sites for the 2026 Census Test. We will post the report on [our website](#) per the Inspector General Act of 1978, as amended (5 U.S.C. §§ 404, 420).

Within 60 calendar days, please provide an action plan addressing the report's recommendations, as required by Department Administrative Order 213-5.

We appreciate your staff's cooperation and professionalism during this evaluation.

Attachment





Evaluation of the Methodology the Census Bureau Used to Select the Test Sites for the 2026 Census Test

Evaluation Report OIG-26-012-I

March 16, 2026

➤ **What We Evaluated** | Our objective was to assess the Census Bureau’s methodology used to select the test sites for the 2026 Census Test.

➤ **Why This Matters** | The next decennial census of U.S. residents will take place in 2030. The decennial is a massive operation, requiring years of planning and testing to ensure the efficiency of its operations and the accuracy of the headcount. Deficiencies in planning or testing could affect the integrity, efficiency, and effectiveness of decennial operations.

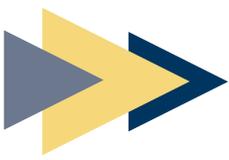
The 2026 Census Test is the bureau’s next major test, intended to evaluate new and enhanced processes and methods to improve the design of the 2030 census. The test will center on a hypothetical Census Day of April 1, 2026, with in-field operations carried out at multiple sites. Each site was selected to provide distinct demographic, geographic, and logistical conditions to help the bureau refine its operations and inform key design decisions for 2030. Bureau officials stated that they used an innovative data-driven process—one that it had never used before—to select the test sites.

➤ **What We Found** | The bureau could not provide supporting documentation of the judgments, methodologies, and assumptions used to plan, execute, and provide oversight of the test site selection process. As a result, we could not verify how the bureau selected the test sites. The bureau did not:

- Have a formal plan outlining site selection responsibilities and methodologies
- Maintain formal documentation to support decisions and methodologies
- Document evidence of reviews, verification of work, or approvals

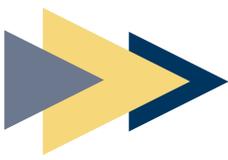
Without establishing a formal, documented methodology as a solid foundation, as specified by its own statistical quality standards, the bureau risks inefficiencies or suboptimal site selections that could compromise overall readiness for the 2030 census and beyond.

➤ **What We Recommend** | We made two recommendations to the bureau to strengthen its processes for reviewing and documenting site selections for future census tests. The bureau concurred with our recommendations and is working to implement them.



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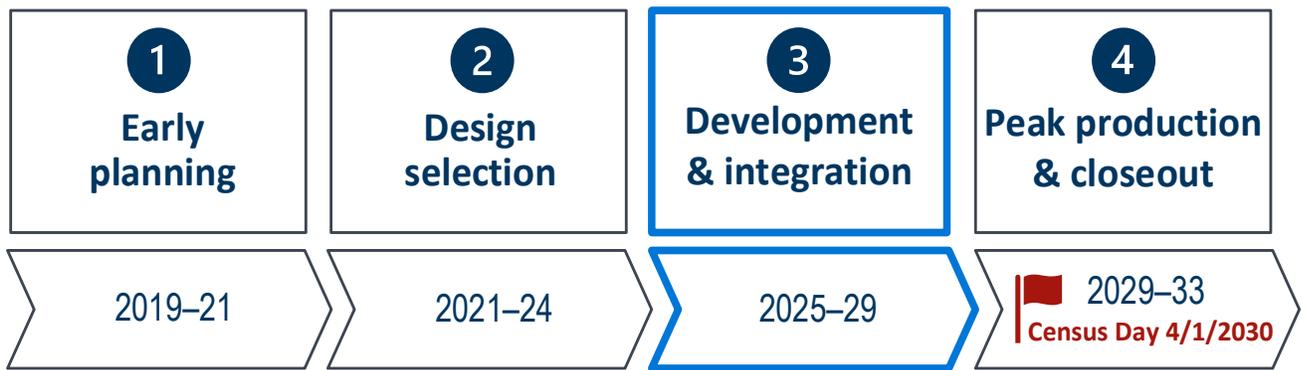
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Introduction

The 2030 census is a multiyear program that has been underway since the U.S. Census Bureau began planning in 2019; it is scheduled to conclude in 2033. The program encompasses four distinct phases, as shown in figure 1. Appendix 1 details the specific activities in each phase.

Figure 1. Phases of 2030 Decennial Census
Calendar years shown. Census is currently in phase 3.



Source: OIG analysis of 2030 decennial census timeline

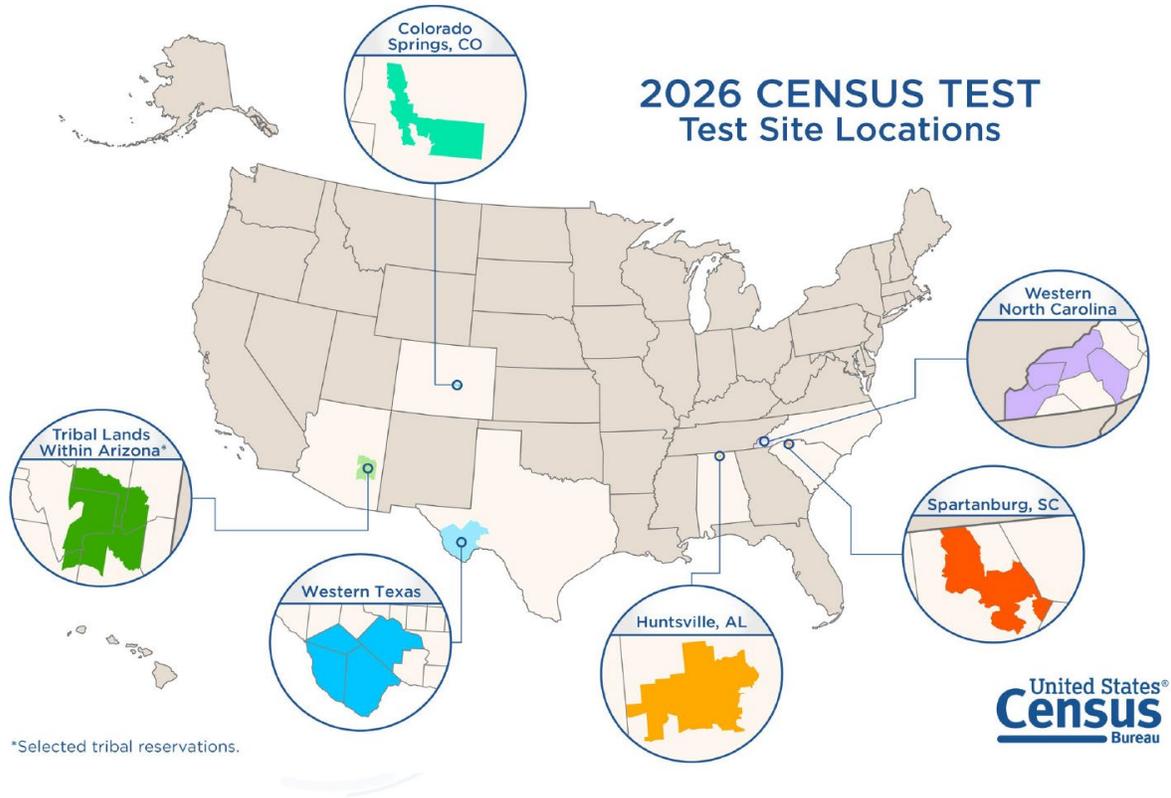
The bureau is now in the development and integration phase, during which it will continue research and testing to prepare for enumeration in 2030. This phase includes two major field tests—the 2026 Census Test and the 2028 Dress Rehearsal. Each test is designed to measure the effectiveness of new or improved systems and methods for carrying out the decennial census. The bureau publicly issued its operational plan for the 2030 census on July 23, 2025, and will refine the plan and update activities as needed following these tests.

► Testing Methods for Improving the 2030 Census Count

The bureau plans to use the 2026 Census Test to evaluate new or enhanced processes and methods to improve the 2030 decennial census design. The test will be centered around a Census Day of April 1, 2026, with in-field operations carried out at multiple sites. These efforts aim to improve the quality and coverage of the census, particularly through new contact strategies targeting hard-to-count households and enhancements to the enumeration of group quarters. A key feature of the test will be nationally representative self-response testing, which will allow the bureau to analyze response behaviors and refine its contact strategies.

On July 22, 2024, the bureau publicly announced six sites for the 2026 Census Test (see figure 2).

Figure 2. 2026 Census Test Site Locations



Source: U.S. Census Bureau, July 22, 2024. [2026 Census Test: Site Selection](#). 2030 Census Webinar Series. Accessed May 9, 2025.

These sites were chosen to allow the bureau to test the effectiveness of innovations and enhancements across six operational areas. According to bureau officials, each site was intentionally selected to provide distinct demographic, geographic, and logistical conditions that will help the bureau refine these operational elements and inform key design decisions for the 2030 census.

The bureau has identified six operational areas expected to support the enumeration of historically undercounted and hard-to-count populations:

1. Self-response: Making it easier for people to respond to the census on their own online, by phone, or by mail
2. In-field enumeration: Improving how census takers collect data from households in person

3. Group quarters enumeration: Improving methods for counting people living in group quarters
4. Communications, partnerships, and engagement: Enhancing outreach efforts that create awareness, build trust, and encourage response
5. Cross-operational support and infrastructure: Enhancing the infrastructure that supports census operations
6. Near-real-time response processing: Processing data concurrently with data collection

► **Selecting the 2026 Census Test Sites**

Bureau officials explained that they used a new, innovative, and rigorous data-driven process to select the test sites. This process employed data related to 19 requirements that were divided into four categories: (1) geography, (2) characteristics of living quarters, (3) staffing, and (4) technical characteristics (see appendix 2 for details on the site selection requirements). According to officials, they used a scientific approach for selecting sites that had not been used in past test site selections.

Two cross-functional teams were involved in the selection process. A 12-member group, referred to by the bureau as the “small site-selection team,” developed the heat map tool used to select the sites. A 45-member group, referred to as the “large site-selection team,” provided the requirements to the small site-selection team.¹ According to Decennial Census Management Division (DCMD) officials,² most of the selection process was driven by the heat map tool, which processed bureau data to identify potential sites. The final selection of the six sites was based on bureau officials’ judgment.

► **Objective**

Our objective was to assess the bureau’s methodology used to select the test sites for the 2026 Census Test. Appendix 3 details our scope and methodology.

¹ The members of the small site-selection team represented the Decennial Census Management, Field, Decennial Statistical Studies, and Geography Divisions. The large site-selection team included the entire small team as well as stakeholders from the Associate Director for Decennial Census, the Population Division, the Decennial Budget Office, and the Decennial Information Technology Division.

² Appendix 3 lists the DCMD management and staff we interviewed.



Finding and Recommendations

Summary: Overall, we found that the bureau could not support key methodologies it used to select test sites for the 2026 Census Test. The bureau could not provide documentation to support the judgments, methodologies, and assumptions used in planning, executing, and providing oversight of the site selection process. Contrary to its own quality standards, the bureau did not:

- Have a formal plan outlining site selection responsibilities and methodologies
- Maintain formal documentation to support decisions and methodologies
- Document evidence of reviews, verification of work, or approvals

Without supporting documentation, we could not verify how the bureau selected the six test sites. The deficiencies in the site selection process could affect the integrity, efficiency, and effectiveness of future operational testing for the 2030 decennial.

► **The Bureau Could Not Support Key Site Selection Methodologies for the 2026 Census Test**

We found that the bureau could not provide documentation to support the judgments, methodology, and assumptions the selection teams used when planning, executing, and providing oversight of the site selection process. Officials did not follow the *U.S. Census Bureau Statistical Quality Standards*³ to (1) document a formal plan before beginning the site selection process, (2) maintain formal documentation to substantiate decisions and methodology they carried out, and (3) provide evidence that they verified the accuracy of computations or obtained management approval throughout the site selection process.

The *Statistical Quality Standards* requires the bureau to maintain documentation in support of activities that generate its information products. This documentation must be

³ Census Bureau. April 2023. [U.S. Census Bureau Statistical Quality Standards](#). Accessed March 4, 2025.

retained according to applicable policies and data use agreements and made available to relevant bureau employees to support their work.⁴

According to DCMD officials, their approach for selecting the test sites was to be the most scientific and thorough method ever implemented at the bureau. They followed a high-level timeline during the site selection process and used methodologies that were distinct from site selection procedures for previous decennial census tests. However, the bureau could not substantiate the decisions and methodologies it used throughout the site selection process. These limitations prevented us from obtaining a clear understanding of the rationale behind the bureau's key decisions. This hindered our ability to fully assess the bureau's site selection methodology.

A Formal Plan Was Not Developed Ahead of Site Selection Efforts

Although it was developing a new site selection process for the 2026 Census Test, the bureau did not create a formal plan detailing responsibilities and its methodology at the start of the planning process. The *Statistical Quality Standards* states that before analysis begins, the bureau must develop a formal plan that clearly describes the analysis, data sources, and methodology to be used.⁵ Instead, the teams took an iterative approach to development, refining the methodology as they went.

While officials asserted that this approach was a new and scientific method for selecting decennial census test sites, we could not assess their methodology due to missing supporting documentation. DCMD officials shared with us an extract from the Integrated Master Schedule⁶ showing planned and actual dates for activities, but the extract showed only the completed activities and did not describe how they were carried out or the specific steps that were taken during this process. According to officials, no formal plan was developed because of several factors:

- **Focus on innovation over documentation.** The small site-selection team introduced a new, data-driven methodology, using a heat map tool to improve efficiency and reduce the burden of data lookups. While this innovation aimed to streamline the process, the team focused on exploration rather than documenting a formal plan for building and using the tool. Their approach was developed iteratively through trial, error, and discovery.

⁴ *Statistical Quality Standards*, requirement E1-6, 109.

⁵ *Statistical Quality Standards*, requirement E1-2, 106–107.

⁶ The Integrated Master Schedule is a program schedule that integrates the planned work, resources necessary to accomplish that work, and associated budget. This helps the bureau plan, track, and coordinate all the work involved in the 2030 census.

- **Competing priorities and time constraints.** According to DCMD officials, the team could not allocate enough time to document each step of the new site selection process due to tight deadlines and competing priorities. Juggling multiple responsibilities limited team members’ ability to thoroughly capture and formalize the methodology.
- **Restricted discussions.** The team did not record meetings or document certain aspects of the selection process. The methodology and preliminary results were not disseminated beyond the small site-selection team to support their independence and ensure that information was only shared on a need-to-know basis.

While we agree that innovation, time, and independence are valuable, the decision not to develop and document a formal selection plan undermined the bureau’s work—and ours—in several ways. The absence of a documented plan undermines the bureau’s ability to ensure that its methodology is consistently applied and thoroughly vetted. It also reduces traceability, leaving us unable to validate or replicate the bureau’s site selection approach and limiting our ability to provide effective oversight and assess the site selection process.

Site Selection Decisions and Methodologies Were Not Documented

Bureau officials acknowledged that they did not document a plan in advance; instead, they maintained documentation throughout the site selection process. However, they failed to provide the documentation we needed to replicate and evaluate the process, such as meeting notes, coding logs, or other supporting documentation outlining the rationale behind key site selection decisions. In addition, despite our repeated requests, the bureau did not provide formal documentation detailing the site selection methodology, such as requirements applied, how the heat map tool was used in practice, and how final decisions were made. The *Statistical Quality Standards* requires the bureau to retain the documentation necessary to replicate and evaluate its analysis. Examples of documentation include plans, requirements, specifications, and procedures relating to the analysis, computer coding, and data files.⁷

A clear and documented methodology was not established before or during the actual execution of the site selection process. Instead, the Decennial Statistical Studies Division (DSSD) began formalizing the methodology a few months after the site selection process ended and the six test sites were announced. Bureau officials said the methodology was still being documented and finalized for use for the 2028 Census Dress Rehearsal. By delaying this documentation, the bureau missed the opportunity to capture critical details about the rationale behind key decisions. During our fieldwork for this evaluation, staff

⁷ *Statistical Quality Standards*, requirement E1-6, 109.

were still attempting to document the decision-making process based on recollection, which increases the risk of inaccuracies.

Bureau staff used an interactive, web-based software application to generate the heat map tool used in site selection. While the bureau provided the programming code used in the tool, they were unable to provide evidence of recorded outputs such as execution logs, which would have demonstrated how the code was run. The lack of formal records of the actions, steps, and decisions made during the process hindered our ability to trace the methodology or verify the decision-making process.

The bureau also did not provide sufficient documentation to support key decisions, particularly the final site selections. These decisions were made by the small site-selection team after internal discussions but without direct input from the large site-selection team. Only the small team had access to the rationale for the decisions, and no meeting notes were recorded. According to DCMD officials, this lack of documentation was due in part to members of the small team managing competing priorities in addition to site selection.

While we acknowledge the importance of allowing flexibility in the development and refinement of the site selection process, the absence of clear and complete documentation is not in accordance with the *Statistical Quality Standards*. It hinders the bureau's ability to track decision-making, incorporate lessons learned, and ensure a consistent and transparent process as it prepares for the 2026 Census Test and future operations. This lack of documentation also poses a risk for future census test site selection, as it limits the bureau's ability to measure the effectiveness of the decisions and assumptions made using this innovative new process. Without a reliable record, the bureau may struggle to make informed adjustments and improvements to future tests and the 2030 census.

Reviews, Verifications of Work, and Approvals Were Not Documented

The *Statistical Quality Standards* states that the bureau must verify the accuracy of computations and ensure that data and the underlying assumptions for analyses are appropriate.⁸ Examples of verification activities include reviewing computer code to ensure that appropriate data and variables were used and the code was correctly programmed, and requesting peer reviews by subject matter experts to assess the approach and results.

Bureau officials explained that the members of the small site-selection team conducted peer reviews among themselves while running the heat map tool, but these reviews were oral and not formally documented. Similarly, management reviews of the site selection process and recommended sites were conducted through presentations, with oral

⁸ *Statistical Quality Standards*, requirement E1-5, 108–109.

feedback and approvals. As a result, there were no formal records of feedback or of any efforts to verify the thoroughness of these reviews.

According to bureau officials, no time or resources were available to document the reviews. The officials explained that team members held weekly meetings to review each other's code and the outputs derived from querying the combined datasets; management also reviewed presentations. However, team members were handling numerous other responsibilities, and the intense workload associated with the site selection process made it difficult to allocate time for proper documentation.

After we began the reporting process, bureau officials shared that the Decennial Research Objectives and Methods Working Group (DROM)⁹ had conducted what the bureau considered to be an independent review of the site selection methodology. This review occurred after the site selection teams had completed work and was intended to assess the overall soundness of the site selection approach.

According to DROM officials, the DSSD conducted a comprehensive internal review of the site selection process before submitting it for the DROM's independent review. However, the bureau was unable to provide documentation demonstrating the scope or substance of the DSSD's review. The DROM's review consisted of a presentation by DSSD staff that outlined the 19 site selection requirements and demonstrated the heat map tool. We were provided with a summary of the review and the presentation slides, but these materials lacked details on the DROM's analysis and final decision. Moreover, because the materials the DROM reviewed were similar to what we were provided—which we found to be inadequate—the DROM could not demonstrate that it had been able to conduct a review comprehensive enough to determine the sufficiency of the site selection.

Without documentation, there is no evidence of review, deliberation, or approval of key decisions, impacting the bureau's ability to demonstrate the thoroughness of its verification process. As a result, we could not substantiate the bureau's statements that these reviews occurred.

Lack of Transparency Increases Risk

The lack of a formal plan, documentation supporting decisions and processes, and evidence of reviews increases the risk of inconsistency and inaccuracies. It also undermines assurance that the site selection process was free from errors. If the bureau

⁹ The DROM is responsible for deriving relevant decennial research objectives, advising on appropriate sound methods, and ensuring the meaningfulness and accuracy of reports issued for research and testing throughout the 2030 census lifecycle.

did not select the appropriate test site locations, it may not meet its goals for the 2026 Census Test.

Formalizing the planning process from the outset would have helped ensure that all stakeholders understand their roles and responsibilities. This would in turn have fostered a more organized, transparent, and accountable site selection process, and would have helped support high-quality standards, minimize risks, and ensure the achievement of the 2026 Census Test’s objectives. Without clear documentation, the site selection process and methodology lack transparency, making it difficult to replicate, evaluate, or review.

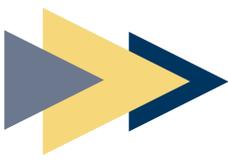
This raises concerns about the quality, reliability, and integrity of the test site selection results—particularly since the methodology used is intended to inform the 2028 Dress Rehearsal. Failure to select appropriate test sites may result in missed opportunities to evaluate critical enhancements and refine operations ahead of the 2030 census.

Overall, the deficiencies in the 2026 Census Test site selection process could affect the integrity, efficiency, and effectiveness of future operational testing. Without establishing a formal, documented methodology as a solid foundation, as required by the bureau’s own *Statistical Quality Standards*, the bureau risks inefficiencies or suboptimal site selections that could compromise overall readiness for the 2030 census and beyond.

Recommendations

We recommend that the Director of the Census Bureau:

1. Strengthen the independent review process for future site selections to ensure that independent reviews are rigorous, transparent, and well documented, with clear evidence to verify that site selection criteria are data driven, methodology is consistently applied, review findings are thoroughly recorded and justified, and final decisions receive explicit approval.
2. Document all aspects of the site selection process, including independent reviews, plans, methodology, assumptions, data analyses, meetings, substantive deliberations and feedback, and interim and final decisions before making future site selections.



Summary of Bureau’s Response and OIG Comments

The bureau reviewed a draft version of this report and responded to our findings and recommendations. In its response, the bureau concurred with our recommendations and described actions it has taken or plans to take to address them. The bureau’s response is included in this report as appendix 4. The bureau also provided technical comments on the draft report. We considered those comments and revised the report where appropriate.

In addition, the bureau announced on February 2, 2026—after our draft report was issued—that the 2026 Census Test would be conducted at two sites: Huntsville, Alabama, and Spartanburg, South Carolina. (This evaluation focused on assessing the methodology used to select sites based on the test objectives announced on July 22, 2024.)

Below we address two notable comments from the bureau’s response to our draft report.

► **Applicability of *Statistical Quality Standards* to Site Selection**

In its response, the bureau maintained that the *Statistical Quality Standards* did not apply to the 2026 Census Test site selection. The bureau wrote that while the standards cover information products such as core, experimental, and research-based statistical products produced by bureau staff or using bureau data, the bureau viewed the site selection not as an informational or statistical product, but as a purposively selected sample (that is, a sample selected using specific requirements).¹⁰

We do not agree with the bureau’s position. The *Statistical Quality Standards* define information products broadly, as any statistical product produced by bureau staff or using census data. This includes experimental products developed using new data sources or methodologies to meet the emerging needs of data users, as well as research-based products expected to meet appropriate scientific standards. Furthermore, the standards apply not only to the information products themselves, but also to “the activities that generate those products.”¹¹ Based on this definition, we determined that the *Statistical Quality Standards* were applicable to the selection of the test sites—an activity that must be completed in order to perform the test.

¹⁰ The bureau did not raise this concern during our evaluation fieldwork.

¹¹ *Statistical Quality Standards*, Preface, iii.

The bureau itself acknowledged during our fieldwork that field tests, including the 2026 Census Test, are covered by the standards and that they are used to generate the bureau’s 2030 census products. Considering this, the bureau’s characterization of the site selection process is notable—using census data in a research-oriented, scientifically derived manner to select test sites; describing this approach as new, innovative, and the most scientific method used to date; publicly releasing the results of the site selections; and making selections based on criteria¹² that used census data and statistical methodologies. Bureau officials further stated that this approach could be repeated to inform future site selections.

Although the bureau had no specific, formal quality assurance policy in place over the site selection methodology, bureau management still had to ensure that they made decisions using reasonable and reliable processes. Even when a purposive sampling approach is used, the methodology and decision criteria should be documented and guided by established standards. Applying the U.S. Government Accountability Office’s (GAO’s) internal control principles,¹³ for example—particularly those related to control activities, information, and communication that are similar to parts of the *Statistical Quality Standards*—promotes transparency, consistency, and accountability in how site selection decisions are made.

Because the 2026 Census Test will directly influence future planning and operational decisions for the 2030 decennial census, the site selection process has a material effect on future statistical decisions and census outcomes. The impact of these decisions reinforces the need for a formal quality framework embedded in the site selection process. Therefore, we maintain that the process should follow the requirements of the *Statistical Quality Standards*.

Despite its assertion that the standards did not apply to site selection, the bureau stated in its response that it incorporated “key quality efforts” because they are best business practices. However, it did not identify any specific examples of those efforts, nor did it provide supporting documentation or other evidence demonstrating that key quality efforts were designed or applied. Therefore, we were unable to validate this statement.

► **Lack of Documentation of the Site Selection Process**

The bureau recognized that its planning and documentation of the selection process could be improved and welcomed suggestions on how to strengthen the program for the future.

¹² As previously stated, the four sets of criteria were (1) geography, (2) living quarters characteristics, (3) staffing, and (4) technical characteristics.

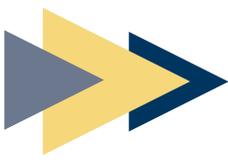
¹³ Published by GAO, *Standards for Internal Control in the Federal Government* (the “Green Book”) sets the standards for an effective internal control system for federal agencies.

The bureau asserted, however, that it did informally document throughout the site selection process and that it provided documentation to us in multiple formats. According to the bureau, the documentation outlined which primary and secondary requirements were met, the test objectives each site supported, and various metrics that informed the selection decisions.

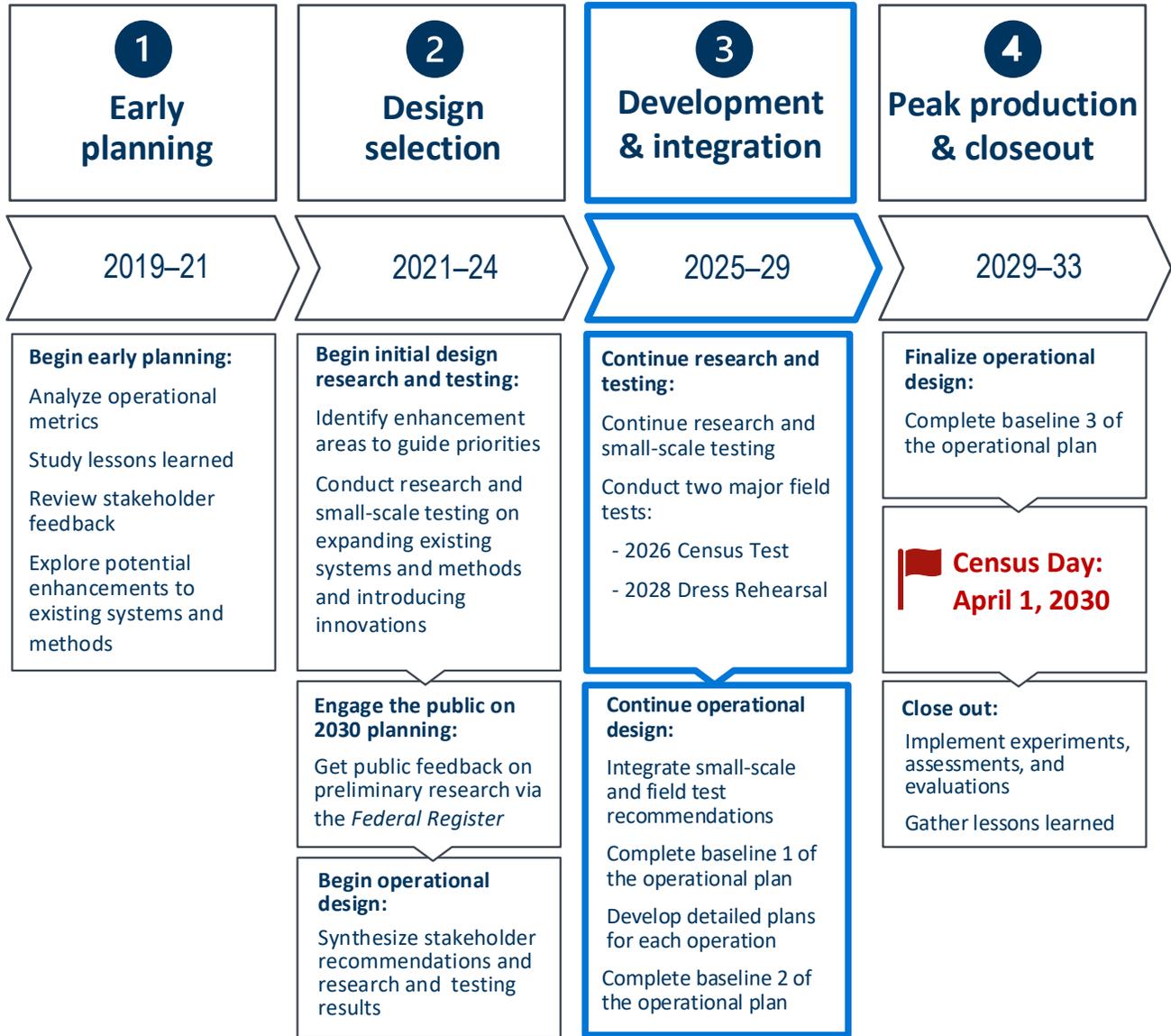
However, the materials we received during the evaluation were mainly slide presentations summarizing the final site selections. The presentations showed the results of actions and decisions rather than the step-by-step methodology, rationale, or criteria used to make those decisions. Bureau officials walked through these materials with us and described them based on their recollections, also explaining the heat map tool, proposed sites, and review processes. During these briefings, they acknowledged that the methodology had not been finalized before the site selection process was completed and that it was still being documented during our evaluation.

While verbal explanations provide context, they do not allow for independent verification or thorough evaluation of the process. In addition, allowing us access to the heat map tool and supporting data alone would not address the lack of documented methodology. Detailed documentation such as site selection plans, review plans, methodological descriptions, assumptions, data analyses, meeting records, reviewer comments, and approvals is necessary to ensure transparency, traceability, and the ability to independently assess the rigor and consistency of the site selection process. Without this level of documentation, the process cannot be fully evaluated or verified.

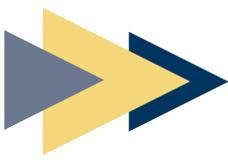
We are pleased that the bureau concurs with our recommendations. We look forward to receiving the bureau's action plan, which will provide details on its corrective actions.



Appendix 1. 2030 Census Planning Timeline



Source: U.S. Census Bureau, February 10, 2025. [2030 Census Planning Timeline](#). 2030 Census. Accessed May 8, 2025.



Appendix 2. Site Selection Requirements

Below is a list of requirements used to select the sites for the 2026 Census Test.

Category	Site Selection Requirement
Geography	<ol style="list-style-type: none"> 1. Locations across two regional census centers 2. Tribal areas 3. Colonias 4. Rural areas with nonmailable addresses and historically lower rates for self-response
Characteristics of Living Quarters	<ol style="list-style-type: none"> 5. Areas with high numbers of seasonally vacant housing 6. Complex households 7. High instances of new construction 8. Urban areas with multi-units and/or hidden units 9. Combination of both group quarters and housing units 10. College areas with student housing that can be considered group quarters or housing units 11. Continuing care facilities* with a mix of housing units and group quarters 12. Military installation with residents who live in military barracks 13. Variety of other types of group quarters†
Staffing	<ol style="list-style-type: none"> 14. Sites where recruiting field staff has been historically challenging 15. Different levels of unemployment rates
Technical Characteristics	<ol style="list-style-type: none"> 16. Low cellular connectivity 17. No internet connectivity 18. Comprehensive and minimal administrative data 19. Sites that are within designated market area and have ethnic media audience and vendor options

Source: OIG analysis of bureau’s 2026 Census Test Site selection requirements

* Continuing care facilities include assisted living, independent living, nursing, hospice, and memory care facilities.

† Other types of group quarters include correctional facilities, group homes, residential treatment centers, worker dormitories, and skilled nursing facilities.



Appendix 3. Scope and Methodology

The objective of our evaluation was to assess the bureau’s methodology used to select the test sites for the 2026 Census Test. Our evaluation focused on the bureau’s planning and preparation leading up to the announcement of the selected sites on July 22, 2024. We considered the application of the requirements that led to the selection of the 2026 Census Test sites. Based on our risk assessment, we scoped our work to focus on the (1) formulation of planning and requirements, (2) execution of the site selection process, (3) oversight of the site selection process, and (4) contingency planning. To accomplish our objective, we:

- Interviewed the following key personnel to learn about the bureau’s site selection process:
 - The small site-selection team, which included the following representatives from multiple divisions across the bureau:
 - DCMD: Assistant division chiefs, branch chiefs, program managers, and program analysts
 - Field Division: Program managers
 - DSSD: Division chief, branch chief, and statisticians
 - Geography Division: Assistant division chief and team lead
 - The large site-selection team, which included all members of the small site-selection team along with the following representatives from across the bureau:
 - DCMD: Program managers
 - Field Division: Program managers and program analysts
 - Office of the Associate Director for Decennial Census: Program managers and program analysts
 - Geography Division: Assistant division chief and team lead
 - Staff responsible for developing and vetting enhancement area research recommendations, including DCMD and the Decennial Communications Coordination Office directors and program managers; they noted that over 70 individuals from various directorates across the bureaus participated in discussions about enhancement area research recommendations

- DROM co-chairs responsible for conducting an independent review of the site selection process
- Reviewed relevant laws, regulations, standards, policies, and guidance including:
 - GAO, *Standards for Internal Control in the Federal Government*, GAO-14-704G, dated September 2014¹⁴
 - Census Bureau, *Statistical Quality Standards*, revised April 19, 2023
 - Census Bureau, *2026 Census Test Goals, Objectives, and Success Criteria*, ver. 1.0, dated December 15, 2023
 - Census Bureau, *2030 Census Risk and Issue Management Plan*, ver. 1.0, dated February 23, 2023

In addition, we assessed the internal controls that were significant to our objective by interviewing bureau officials and reviewing documentation for evidence of internal control procedures. We carried out procedures to determine whether internal controls were carried out appropriately. We identified internal control weaknesses, as described in the “Finding and Recommendations” section of this report. Our evaluation found no incidents of fraud, illegal acts, or abuse.

We were unable to carry out all planned procedures on the site selection process. As described in this report, documentation provided was not sufficient to support the judgment, methodology, and assumptions used in the planning, execution, and oversight of the 2026 Census Test site selection process. The lack of documentation prevented a clear understanding of the rationale behind key decisions. Therefore, we were unable to complete all planned work to obtain and review plans, methodology, and coding language and logs used to run the heat map tool to determine whether the bureau had applied and adhered to designed methodology and correctly applied site selection requirements.

We did not rely on computer-processed data to formulate our findings because the bureau did not finalize documentation of its site selection methodology. Without sufficient documentation to explain how the data was generated, processed, and applied, we had no reliable basis for oversight or evaluation. The absence of a defined methodology precluded us from assessing the reliability of the data, rendering further testing and analysis unnecessary.

We obtained and reviewed the bureau’s contingency plan, developed in accordance with the *2030 Census Risk and Issue Management Plan* to address the risk of insufficient

¹⁴ GAO published an update to the *Standards for Internal Control in the Federal Government* in May 2025. The revision became effective in fiscal year 2026. Early implementation was permitted, but the evaluation team relied on the September 2014 version in place at the beginning of our fieldwork.

funding for the 2026 Census Test. We monitored the risk and implementation of the contingency plan, but at the time of reporting, the contingency plan had not been implemented.

We conducted our evaluation from December 2024 through September 2025 under the authority of the Inspector General Act of 1978, as amended (codified at 5 U.S.C. §§ 401–424), and Department Organization Order 10-13, as amended October 21, 2020.

We conducted this evaluation in accordance with *Quality Standards for Inspection and Evaluation* (December 2020) issued by the Council of the Inspectors General on Integrity and Efficiency. Those standards require that the evidence sufficiently and appropriately support evaluation findings and provide a reasonable basis for conclusions and recommendations related to the objectives. We believe that the evidence obtained provides a reasonable basis for our finding, conclusion, and recommendations based on our review objectives.



Appendix 4. Bureau's Response

The bureau's response to our draft report begins on the next page.



UNITED STATES DEPARTMENT OF COMMERCE
U.S. Census Bureau
Office of the Director
Washington, DC 20233-0001

November 19, 2025

MEMORANDUM FOR: Analee Striner-Brown
Acting Assistant Inspector General for
Audit and Evaluation
Office of the Inspector General

From:

George M. Cook
Chief of Staff

**GEORGE
COOK**

Digitally signed by
GEORGE COOK
Date: 2025.11.19
18:15:21 -05'00'

Performing the Non-Exclusive Functions and Duties of
the Director, U.S. Census Bureau

Subject:

U.S. Census Bureau's Response to the Office of the Inspector
General's Draft Report: "*Evaluation of the Methodology the
Census Bureau Used to Select the Test Sites for the 2026
Census Test.*"

Thank you for the opportunity to provide comments on the Office of Inspector General's draft report titled, "*Evaluation of the Methodology the Census Bureau Used to Select the Test Sites for the 2026 Census Test.*" dated September 3, 2025. The U.S. Census Bureau respectfully submits the attached comments.

Attachment

U.S. Census Bureau Comments on the Office of Inspector General's Report: "Evaluation of the Methodology the Census Bureau Used to Select the Test Sites for the 2026 Census Test."

General Comments:

The U.S. Census Bureau appreciates the opportunity to comment on this draft report and its recommendations regarding the methodology the Census Bureau used to select the test sites for the 2026 Census Test.

The selection of test sites plays a critical role in ensuring that the Census Bureau meets the objectives of the 2026 Census Test. These locations must offer the best possible conditions to implement the planned changes and enhancements under real-world conditions and at a broader scale than simulations allow. To achieve this, the Census Bureau employed a rigorous, data-driven approach to identify the most suitable test sites. The site selection process began once the full scope of the 2026 Census Test was defined. After a thorough data-driven evaluation, the team recommended site combinations that best met the testing criteria. Although several viable options existed, the selected sites were chosen based on both analysis and expert judgment to ensure they met all objectives within budget, system, and resource constraints. No single site could support every testing need but, together, the chosen locations provide the necessary conditions to evaluate all enhancements and changes across operational areas. We are confident these sites offer the optimal environment to achieve all test objectives.

The Census Bureau would like to focus on two major themes throughout Department of Commerce's Office of Inspector General's (OIG) report, the mention of quality standards and the lack of formal documentation of the 2026 Census Test site selection process.

First, the mention of quality standards. It was indicated in the OIG report that contrary to the Census Bureau's Statistical Quality Standards, the Census Bureau did not have a formal plan outlining the site selection responsibilities and methodologies, did not maintain formal documentation to support decisions and methodologies, and did not document evidence of reviews, verification of work, or approvals.

The Census Bureau maintains that the Census Bureau's Statistical Quality Standards do not apply to the 2026 Census Test site selection because it is not an information or statistical product but rather an area sample purposively selected for testing. Per the Census Bureau's Statistical Quality Standards, the scope of these standards "apply to all information products released by the Census Bureau and the activities that generate those products, including products released to the public, sponsors, joint partners, or other customers." The 2026 Census Test site selection is not an information product, so the standards do not apply and should not have been used.

Furthermore, it states the scope of the Statistical Quality Standards and defines information products: "for the purposes of these standards, information products include any statistical product produced either by Census Bureau staff or using Census Bureau data. Census Bureau information products are broadly segmented into core, experimental, and research-based statistical products."

Despite the fact that these quality standards did not formally apply, the Census Bureau still incorporated key quality efforts since they are best business practices.

Second, it was also mentioned that the Census Bureau did not formally document the site selection process and without clear documentation, the site selection process and methodology lacked transparency, making it difficult to replicate, evaluate, or review. The Census Bureau did, in fact, informally document throughout the process and the documentation provided to OIG was in multiple formats including but not limited to, presentations, code, requirements used in site selection, along with supporting data for each site selected. Specifically, the documentation outlined which primary and secondary requirements were met, the test objectives each site supported, and various metrics that informed the selection decisions.

We recognize that there is room for improvement in our planning and documentation of the process and welcome suggestions on how to strengthen the program for the future.

OIG Recommendations and Census Bureau Responses:

Recommendation 1: Strengthen the independent review process for future site selections to ensure that independent reviews are rigorous, transparent, and well documented, with clear evidence to verify that site selection criteria are data driven, methodology is consistently applied, review findings are thoroughly recorded and justified, and final decisions receive explicit approval.

Census Bureau Response: The Census Bureau accepts this recommendation. The Census Bureau will strengthen the independent review process for future site selections by involving independent experts early, ensuring a rigorous and robust evaluation. We will also provide comprehensive documentation to support a data-driven consistently applied methodology and ensure that all final decisions receive explicit approval.

Recommendation 2: Document all aspects of the site selection process, including independent reviews, plans, methodology, assumptions, data analyses, meetings, substantive deliberations and feedback, and interim and final decisions before making future site selections.

Census Bureau Response: The Census Bureau accepts this recommendation. The Census Bureau will follow the 2028 Dress Rehearsal Site Selection Project Plan, which outlines the procedures related to site selection process. This includes required documentation, methodology, the duration of site selection activities, site selection related requirements, supporting data on sites selected, steps for internal review and approval, final deliverables, and the process for external communications.

REPORT

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