

**EMAIL Thread From Bridget to Census Bureau**

From: **Susel, Bridget** <[suselb@kent-ohio.org](mailto:suselb@kent-ohio.org)>

Good Afternoon,

I appreciate the follow-up from the U.S. Census and I have already contacted the Ohio Secretary of State's office on this matter and am waiting for a call back.

What is unclear to me, based on your reply today, is the City of Kent submitted its LUCA data directly to the U.S. Census in 2019 and that data was vetted here by the City of Kent Community Development Department. Was the LUCA data the City of Kent submitted directly to the U.S. Census not used since you are reporting that the Portage County Regional Planning Commission (RPC-Todd Peetz) provided the data that was actually used by the U.S. Census for the City of Kent/Portage County? It would be appreciated if you could expand on this further because it is unclear how the City's LUCA data, which was submitted directly to the U.S. Census, was actually applied to the Census 2020 process.

The Ward 2 discrepancy identifying a decrease of 1,377 in population is not a result of any matter with group quarters. This ward had no wide scale demolition activity and consists of existing detached single-family dwellings/subdivisions (+20 years or older) and multi-unit complexes dating back to the 1960's. The inconsistencies are more than just in Ward 2 and affect population counts in nearly all six wards here in the City. Ward 1, for another example, had no significant demolition activity, but did have two new phases of a subdivision dedicated in the last 5 years and these new addresses were included in the City of Kent LUCA data the City's Community Development Department submitted directly to the U.S. Census, but Ward 1 is now showing a decrease of 321 in population in the 2020 Census data.

The City did have significant new construction involving the addition of several private residential multi-unit complexes constructed in close proximity to Kent State University between 2012-2016 and this increase in units was accounted for in the City's submitted LUCA data. This new construction activity occurred in Wards 3-6, but even the data in these wards has discrepancies although not as egregious as the Ward 2 example identified above. The City is not contesting its overall community population decrease of 682. That can be attributed to poor response rates from Kent State University students who had occupied these new and existing multi-unit complexes moving home in March as a result of the pandemic and not being present in April for the count. What the City is contesting is the errors in Block Group Block counts in areas of the City that have existing established residential units and that have little to no off-campus student housing units, showing significant declines on a ward basis that do not reflect actual residential private development activity over the last decade.

If the Secretary of State cannot provide an interim measure for relief to the City of Kent from the Ohio Revised Code requirement that it report new ward apportionments by the end of December 2021, it is problematic and untenable that the City of Kent may be forced to certify new local ward apportionments to meet the Ohio Revised Code requirement based on spurious Census 2020 Block Group Block data. Some temporary remedy for relief until these discrepancies in the City of Kent's 2020 Census data can be addressed through the CQR process in early 2022 needs to be identified and it would be appreciated if the U.S. Census would be part of addressing this concern.

Thank you in advance for your assistance with this important matter.

On Tue, Nov 9, 2021 at 3:01 PM James Whitehorne (CENSUS/ADDC FED)

<[James.Whitehorne@census.gov](mailto:James.Whitehorne@census.gov)> wrote:

Good afternoon Ms. Susel,

I received your email from our census communications area. You are correct that Census Tracts and Block Groups can be modified in the run up to a decennial census through the Participant Statistical Areas Project (PSAP). This past decade the Census Bureau worked with the respondent for Portage County, Mr. Todd Peetz (330-297-3615 or [tpeetz@pcrpc.org](mailto:tpeetz@pcrpc.org)) to make any necessary changes to those geographies. Our Geography Division would have worked with Mr. Peetz to identify any needed changes and to verify their addition to our geographic universe prior to us publishing any data for the country.

It sounds like you have pulled and verified the 2020 Census population counts reported in the census redistricting data. It also sounds like you are seeing some discrepancies that have caused concern and do not align with your expectations. Typically when you see such a large and focused disparity in population without there being a large change in the housing status, the next step would be to look at the group quarters counts to see if you can see a change in a high density group quarter count. We have a website available on [What to Consider if You Find an Unexpected Census Result](#) that describes some issues to think about for these unexpected results. Unfortunately for your timing, the official appeals program for the 2020 Census, Count Question Resolution Program (CQR), is not accepting cases until January 3, 2022. You may wish to reach out to your Secretary of State's office, Frank LaRose ([Homepage - Ohio Secretary of State](#)) as the chief election officer for the state on guidance on how to proceed under these circumstances.

The purpose of the 2020 Census CQR is to provide a mechanism for governmental units to request a review of their official 2020 Census results and to help ensure that housing and population counts are correctly allocated to 2020 census tabulation blocks in the 50 states, District of Columbia, and Puerto Rico.

The current schedule is as follows:

- Fall 2021: Federal Register notice announces the beginning of a 30-day comment period for the public.
- December 2021: The Census Bureau plans to officially notify tribal, state and local government officials eligible to file CQR cases.
- January 3, 2022: The Census Bureau begins accepting CQR cases for processing from eligible tribal, state and local governments.
- June 30, 2023: Deadline for governments to send CQR cases to the Census Bureau.
- September 30, 2023: Deadline for the Census Bureau to provide results to impacted governmental units.

Note: These dates are subject to change.

For more information on previous CQR programs, please visit [2020 Census Count Question Resolution Operation \(CQR\)](#) or [www.census.gov](http://www.census.gov).

I've CC'd the Count Question Resolution (CQR) Email Inbox - [dcmd.2020.cqr.submissions@census.gov](mailto:dcmd.2020.cqr.submissions@census.gov). The CQR Telephone Assistance line will go live in December 2021. In the meantime, please feel free to reach out to the CQR Team via email if you have additional questions about the CQR Program.

I do hope this is helpful. Please let us know if you have additional questions.

Best Regards

**James Whitehorne, Chief**  
Redistricting & Voting Rights Data Office/ADDC/HQ  
U.S. Census Bureau  
O: 301-763-4039 | M: 202-263-9144  
[census.gov](http://census.gov) | [@uscensusbureau](https://twitter.com/uscensusbureau)

**From:** Susel, Bridget <[suselb@kent-ohio.org](mailto:suselb@kent-ohio.org)>  
**Sent:** Friday, November 5, 2021 12:24 PM  
**To:** CLMSO CS PIO (CENSUS/CLMSO) <[clmso.cs.pio@census.gov](mailto:clmso.cs.pio@census.gov)>; Timothy A Sarko (CENSUS/CLMSO FED) <[Timothy.A.Sarko@census.gov](mailto:Timothy.A.Sarko@census.gov)>  
**Cc:** Heckman, Heather <[heckmanh@kent-ohio.org](mailto:heckmanh@kent-ohio.org)>  
**Subject:** Census 2020 Block Data Discrepancy

Good Afternoon,

The City of Kent, Ohio, downloaded its 2020 Census data from the U.S. Census Bureau website and has been reviewing it in order to identify the changes that will need to be applied to the City's six (6) wards. The Ohio Revised Code Section 731.06 requires the City to make adjustments to the ward boundaries within 90 days of October 1st in a decennial year and the City of Kent Charter limits any ward boundary changes to no more than a 10% population disparity between all 6 wards.

In reviewing the 2020 Census data, there seems to be an error. The same staff, including myself, worked on the City of Kent ward apportionment in 2010. We recognize that some new Block Group Blocks were created, merged, or eliminated and that some changes were made to a few Census Tract boundaries in the 2020 Census. The problem, however, is that the 2020 Census Block Group Block Data for 2-3 of the City's wards are listing significant population changes (increases or decreases) that do not align with where the City had new residential units added or removed. One ward, for example, that is composed of mostly subdivisions in existence for 20+ years and has had no major demolition, is showing a population decrease of 1,377, which is not possible.

The City of Kent contacted the Portage County Auditor's GIS Manager to extract the Census 2020 data for the City of Kent and requested he forward it to us for comparative purposes to ensure the 2020 population data the City downloaded from the Census website was the same. We are currently conducting that comparison and it does appear that the data provided by Portage County GIS aligns with what we extracted as well. Our review will be done early next week, but since it appears that some of the population change disparities do not align with the City's reported LUCA information, a data

correction may be needed to be done through the U.S. Census Bureau. With the ORC deadline requirement of December 31, 2021, I am emailing you to determine the process for initiating a data review/correction by the U.S. Census so that when we have the list of block group blocks that seem to have errors we know where to send that information so we can complete the City's ward apportionment changes and get it legislatively approved in time .

Thank you in advance for your guidance on how to proceed to get data reviewed and if necessary, corrected. It is appreciated.

Sincerely,

Bridget Susel



CITY OF KENT, OHIO  
DEPARTMENT OF BUDGET AND FINANCE  
Rhonda C. Hall, CPA, Director

**To:** Dave Ruller, City Manager  
**From:** Rhonda C. Hall, CPA, Director of Budget and Finance  
**Date:** November 8, 2021  
**Re:** Five-Year Capital Plan

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Mr. Ruller,

I would like to request that a discussion regarding the 2021 to 2026 Capital Plan (CAP Plan) be placed on the November 17, 2021 Agenda.

Thank you.