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MEMORANDUM

November 14, 2017

To: Housing Clients

From: HOBBS, STRAUS, DEAN & WALKER, LLP

Re: ***Upcoming Local Update of Census Address (LUCA) Deadline***

The Local Update of Census Addresses (LUCA) program is a geographic partnership program that provides governments, including tribal governments, the opportunity to review the Census Bureau's address list for their communities and to provide updates to those addresses prior to the 2020 Census. LUCA is a once a decade opportunity for tribal governments to correct outdated data that could lead to undercounting or other errors by the Census Bureau and American Community Survey. The deadline for tribal governments to register to participate is December 15, 2017.

LUCA is a voluntary program, but it helps the Census Bureau get a clearer view of where people live so the agency can get a more accurate count. The LUCA program is authorized by the Census Address List Improvement Act of 1994 (Public Law 103-430), which provides an opportunity for designated representatives of tribal, state, and local governments to review the Census Address List. Geography is the base upon which the Census Bureau's data are built. When a household or business answers a Census Bureau survey, the questionnaire response is attached with the household or business location address. The Census Bureau locates this address within established geographic areas, such as a reservation. The Census Bureau then tabulates data for all of the households and/or businesses located within each geographic area. Because the Census Bureau tabulates data by geographic area, it is important for the Census Bureau to have an accurate address list and quality geographic boundaries.

The LUCA program operates as follows:

- The Census Bureau invited federally recognized tribes that have reservations or off-reservation trust lands to designate a LUCA liaison, who will review the portion of the census address list that covers the area under the tribe's jurisdiction.
- The address list is protected from disclosure by Title 13, United States Code. Participants must review a set of security guidelines and sign confidentiality agreements, promising to protect the confidentiality of the addresses provided for review.

- The Census Bureau will send the LUCA liaison an address list, corresponding maps, and address tallies for his or her community. The Census Bureau encourages tribal governments to work with nontribal governments in neighboring and overlapping jurisdictions to be sure that all addresses are identified for census purposes. If a tribal government chooses not to participate in LUCA for the 2020 Census, the Census Bureau encourages the tribe to delegate its reviewing authority to a state, county, or local government.
- The LUCA liaison can comment on individual addresses, on the address list, and add any addresses that are missing from the list. The Census Bureau will verify this input during the 2020 Census and provide feedback to the participants about the results.
- Public Law 103–430 allows LUCA participants to appeal Census Bureau decisions about the address list used for the 2020 Census. All appeals must be resolved before Census Day to ensure that the housing unit is visited during the enumeration phase. An agency independent of the Census Bureau will review and decide on all appeals prior to Census Day, which will be April 1, 2020.

Letters were sent out to tribal leaders over the summer to ask them to have their tribes participate in the update, and then recently sent reminder letters and post cards to the governments the Census Bureau has not heard from yet.

If your tribal government has not yet signed up, but would like to participate, please visit <https://www.census.gov/geo/partnerships/luca.html>, which includes instructions and application materials to participate prior to the December 15 deadline.

If you have any questions about the items in this memorandum, please do not hesitate to contact Edmund Clay Goodman at EGoodman@hobbsstrauss.com or by phone at (503) 242-1745.