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"This substantive policy statement is advisory only. A substantive policy statement does not include internal procedural documents that only affect the internal procedures of the agency and does not impose additional requirements or penalties on regulated parties or include confidential information or rules made in accordance with the Arizona Administrative Procedure Act. If you believe that this substantive policy statement does impose additional requirements or penalties on regulated parties you may petition the agency under A.R.S. § 41-1033 for a review of the statement."



Population Estimates Challenge Program	Document No.	1001.040
	Revision No.	4.0
	Effective Date	10/28/2015

1.0 Revision History

1.1 Revision Table

Date	Rev. No.	Change	Ref. Section
2/5/2015	1.0	New policy drafted	Not Applicable
2/27/2015	2.0	Involvement of council of government. Changed specific reference of MAG to general reference of COGs.	Sections 4.6 and 6.0.
7/22/2015	3.0	Removed specific list of data items that can be challenged. Added the last sentence of the section.	Section 4.3.
		Removed specific reference to challenges to 2014 estimates.	Section 4.4.
8/4/2015	4.0	Added a specific time frame in which an official challenge must be received.	Section 4.5.3.

1.2 Approval Signatures

Title	Name	Signature	Date
Director	Craig C. Brown		10/28/15
Affected Division Director(s)	Paul Shannon		10/22/15

2.0 Purpose and Background

To meet the requirement of Executive Order 2011-04 and as part of the effort to produce the best possible population estimates, the Arizona Department of Administration (ADOA) will administer a population estimates challenge procedure as outlined in this policy.

The Office of the State Demographer distributed proposed guidelines for the policy at the February 2014 meeting of the Council for Technical Solutions (CTS) and solicited comments from CTS members. At that meeting and in the months following the meeting, the Office of the State Demographer received mostly supportive comments and also some suggestions for details.

At the CTS January 2015 meeting, CTS members again discussed the matter. After incorporating comments from CTS members, the Office of the State Demographer produced a draft policy in February 2015, and distributed it to members of the CTS, and sought further comments.

After receiving no further comments the Office of the State Demographer created this final policy based on the consensus reached among CTS members. Other non-substantive revisions were made for clarity and formatting purposes, only.

3.0 Persons Affected

3.1 All counties in Arizona

3.2 All incorporated cities and towns in Arizona

3.3 All Councils of Governments in Arizona

3.4 The Office of the State Demographer

3.5 Council for Technical Solutions

4.0 Policy

4.1 Principle

To eliminate or minimize the need for official population estimate challenges the Office of the State Demographer strives to work with members of the CTS to resolve any potential issues with population estimates before the estimates are finalized and released each year. In the event when errors are detected or suspected, an official challenge may be made using this Policy.

4.2 What government units may file a challenge?

4.2.1 County government (on behalf of the entire county for county-level estimates or on behalf of the unincorporated areas for place-level estimates);

4.2.2 City/Town government (for place-level estimates).

4.3 What may and may not be challenged?

The accuracy of input data used in the estimates and the accuracy of calculations may be challenged. Methods used in county-level and place-level population estimates may not be challenged.

Because of ongoing research and the change in the availability and quality of various indicator data, estimate methods could change from year to year. The challenge process only deals with input data and calculations that are specified in the methodology statement published for a given year. Any ideas about change in methodology and use of alternative data should be brought up and discussed during regular CTS meetings. If adopted, the updated methods will be described in the methodology statement and the new data will become challengeable. Starting with July 1, 2015 estimates, the methodology document will include a section that lists specific data items that may be reviewed and challenged.

4.4 When must a challenge be filed?

To be considered, a challenge must be filed within 90 calendar days of the release of the annual population estimates.

4.5 Challenge Process

(Acknowledgement: This is substantially similar to the challenge process used by the U.S. Census Bureau in its Population Estimates Program).

4.5.1 Before initiating an official challenge, a government is strongly encouraged to contact the Office of the State Demographer to discuss any concerns they have. When requested, the Office of the State Demographer shall provide all the data and relevant working files used in producing the estimates. Staff of the Office of the State Demographer shall explain the methods. More often than not, this process should address most or all of the concerns.

4.5.2 If, after this initial discussion, the government still decides to proceed with an official challenge, the Highest Elected Official (HEO) or Chief Executive Officer (CEO) from the affected government unit shall submit a letter to the Office of the State Demographer stating the apparent errors in the population estimates, from the two approved errors below. The letter should include the following:

- 4.5.2.1** The name of the government, the name of the HEO or CEO, mailing address, telephone number, and email address;
- 4.5.2.2** Identify the population estimate believed incorrect, based on one or both of the approved errors below:
- 4.5.2.3** Technical error in processing input data or producing the population estimates;
- 4.5.2.4** Incorrect input data used in the process of generating the estimates.
- 4.5.2.5** Evidence to support the existence of an error, documentation, and source of the new data provided.
- 4.5.2.6** The designated contact person who can be reached by phone and email during normal business hours should staff of the Office of the State Demographer have questions about the submitted materials.

4.5.3 Any official challenge must be received from the appropriate challenging government unit within 90 calendar days after the release of the annual population estimates, as stated in 4.4.

4.5.4 The Council of Governments (COG) that represents the county or city may provide technical assistance to the challenging government and serve as a liaison between the Office of the State Demographer and the challenging government.

4.6 How will a challenge be resolved?

The Office of the State Demographer will work with the government unit that filed the challenge and the COG that represents the government unit to verify the issues identified in the challenge documents.

4.6.1 If errors in data, calculation, or process are verified, the Office of the State Demographer shall make the necessary corrections and provide revised population estimates. These revised population estimates shall be the published final population estimates. If errors cannot be verified, no correction will be made. Please note, the revised population estimate may not reflect as the population estimate proposed by the challenging government unit, and could be lower than originally published.

4.6.2 The Office of the State Demographer shall make a final determination on a challenge no later than 180 calendar days after the initial release of the population estimates.

4.6.3 Revision of population estimates for a challenging government unit might necessitate adjustments to population estimates for other jurisdictions. These other jurisdictions shall not cite revised population estimates arrived at through an official challenge, as cause for challenging their population estimates revised through the official challenge process.

4.6.4 ADOA publishes population estimates for all counties, cities, towns, and unincorporated balances of counties in Arizona; however, sub-county population estimates in some counties are made by a COG and are adopted by ADOA in accordance with ADOA Policy 1000.030.

4.6.4.1 When a council of governments petitions to ADOA to have its sub-county population estimates adopted by ADOA, the COG has agreed to review and resolve challenges to its population estimates using the same standards and procedures set forth in this policy.

4.6.4.2 Therefore, when ADOA receives a challenge from a government unit whose sub-county population estimates are made by a COG, ADOA shall forward said challenge to the COG within five business days and the COG shall review and resolve the challenges using the same standards and procedures set forth in this policy within the same 180 calendar day time period.

4.6.4.3 If the COG fails to resolve the challenge in accordance with policy or by failing to act, the Office of the State Demographer shall make a final determination on which population estimate to include.

5.0 Definitions

5.1 “Government unit” means a county or an incorporated place (city or town) in Arizona.

5.2 “Population Estimates” means the calculated number of people living in an area as of a specified point in time, usually July 1st. The estimated population can be calculated

using a number of methods depending on the availability and quality of data for the area.

- 5.3 “Sub-county” means at the incorporated jurisdiction (city or town) level or for the unincorporated balance of a county.

6.0 Responsibilities

- 6.1 The government units described in Section 4.2 have the responsibility to file a challenge by the deadline prescribed in Section 4.4.
- 6.2 The Office of the State Demographer has the responsibility to promptly review the challenge and resolve the matter by the deadline prescribed in Section 4.6.
- 6.3 For population estimates prepared by a COGs, that COG shall review and resolve the challenge to that estimate by the deadline prescribed in Section 4.6.

7.0 Procedures

As described in Sections 4.4 through 4.6.

8.0 Additional Documentation

None.