



# CITY OF FLAGSTAFF

## FLAGSTAFF CITY COUNCIL

211 West Aspen Avenue, Flagstaff, Arizona 86001

Main Line: 928-213-2000

Website: <https://www.flagstaff.az.gov>

November 16, 2021

Sheleen Dumas  
Office of the Chief Information Officer  
Commerce Department  
1401 Constitution Ave NW  
Washington, DC 20230

RE: OMB Control Number 0607-0879

Dear Ms. Dumas,

The Flagstaff City Council respectfully requests a broadening of the criteria for coverage errors to include errors caused by the communication issues at the launch of the 2020 COVID pandemic. The 2020 Census experienced unprecedented challenges, particularly in communities of color and college communities.

The 2020 Census web portal opened for survey responses on March 13, 2020, the day that university students in Flagstaff and across the country departed for spring break. Classes did not resume in-person and because of this unfortunate timing, the Census Bureau was not able to conduct its typical operations to ensure an accurate count of on- and off-campus students. By the time the Census Bureau released modified directions for college students to fill out their Census for where they lived prior to spring break rather than April 1<sup>st</sup>, confusion and error were widespread. In addition, field operations did not restart until after the spring semester and graduation were over.

Despite the best efforts of the Census Bureau to use administrative records in place of field operations, the error introduced by this issue is significant. In Flagstaff, the Census tract overlapping Northern Arizona University shows a vacancy rate 23% higher than the same area in 2010. This is an obvious error that needs the opportunity to be resolved. In addition, areas of Flagstaff that had a high percentage of 18–24-year-old residents in 2010 have also seen a fall in their population according to Census data.

We request that the Census Bureau allow the resubmission of administrative records for college students in and outside of group quarters as part of the coverage criteria of the Count-Question Resolution process. Failing to do so would leave university communities undercounted and would have serious economic impacts throughout the United States.

The Flagstaff City Council also requests that off-campus dormitories that have proliferated over the past decade in university communities throughout the country be counted as group quarters. Coverage issues associated with the off-campus dormitories could then be addressed in the Count Question Resolution process.

Thank you for your consideration,



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Paul Deasy  
Mayor of Flagstaff

Jim McCarthy  
Flagstaff City Councilmember

Miranda Sweet  
Flagstaff City Councilmember

Becky Daggett

Becky Daggett  
Vice Mayor of Flagstaff

Regina Salas  
Flagstaff City Councilmember

Austin Aslan  
Flagstaff City Councilmember

Adam Shimoni  
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