

Ms. Sheleen Dumas
Department PRA Clearance Officer
Office of the Chief Information Officer
U.S. Department of Commerce
Washington, DC 20230

Dear Ms. Dumas:

On behalf of Bloomberg Associates, we are pleased to submit comments in response to *Federal Register* Notice FR Doc. 2021-23567 (86 FR 59980), published by the U.S. Census Bureau on October 29, 2021, seeking clearance from the U.S. Office of Management and Budget for the 2020 Census Count Question Resolution (CQR) Operation.

Bloomberg Associates, the city government consulting arm of Bloomberg Philanthropies, has been supporting cities with their 2020 Census efforts since 2018, in order to ensure the most accurate counts possible. Cities have recently expressed deep concern about the limited scope of the CQR program.

For instance, the Bureau declined to include review of Group Quarters counts, as well missing housing units, which cities we work with view as a missed opportunity for a full and fair census count —especially in the wake of a census that faced unprecedented challenges from the pandemic’s disruption of operations and displacement of people. To counter some of those adverse circumstances, the Census Bureau could have accepted a series of measured expansions to the scope of the Count Question Resolution operation, to remediate missing Group Quarters facilities and associated populations, in particular. The cities we have worked with, namely, Anchorage (AK), Atlanta (GA), Brownsville (TX), Baltimore (MD), Chicago (IL), Detroit (MI), Houston (TX), Los Angeles (CA), Newark (NJ), and Paterson (NJ), are disappointed that the Bureau did not adopt several proposed revisions to the original CQR scope, including: allowing state, Tribal and local governments to review counts of Group Quarters facilities by type for census blocks; review the population counts of Group Quarters facilities by type for census blocks; investigate the feasibility of allowing submission of high-quality administrative records for the purpose of improving the count of students residing off campus on April 1, 2020; and other suggested modifications detailed below, to address the adverse consequences of the disrupted operations. Those impacts will include diminished federal funding allocations over the next decade, on which cities rely to provide critically important services and infrastructure improvements.

Background

While there have been challenges in every census, the Census Bureau faced obstacles in the 2020 Census that were truly unprecedented. The most serious of these was the coronavirus pandemic, which struck when the Bureau began mailing and hand-delivering census packets in March 2020. The timing and procedures for the Group Quarters (GQ) Operation were especially affected, as students left college dorms, and other group facilities, such as prisons, went into lockdown. In addition, the Census Bureau canceled the Early Non-Response Follow-Up Operation to enumerate college students living off-campus, originally planned for March/April 2020, because most college students left their campus-based residences before the semester ended. With the pandemic raging, skilled nursing facilities were quickly off-limits to enumerators; the enumeration of service-based locations was postponed. To make matters worse, the ability of local demographers to check the completeness of the GQ enumeration was dealt a severe blow when the Count Review II operation was largely canceled in September 2020. Thus, from the start, the enumeration of Group Quarters facilities faced difficulties that are unprecedented in modern history.

Efforts to Expand CQR

The very narrow scope of the 2020 program is likely to result in frustration for many governments, many of which saw their robust efforts to support an accurate census derailed by the pandemic.

Acknowledging the need for remediation of problematic Group Quarters counts, the Census Bureau explored ways to expand the challenge program to include certain types of facilities that were missed and, where high quality administrative records exist to fill the void, bringing at least partial relief to state, Tribal and local governments. However, according to the Census Bureau: *“Federal law (13 U.S.C. § 141 and 2 U.S.C. § 2a) specifies that the decennial census is completed when the tabulation is reported to the President of the United States by the Secretary of Commerce. Therefore, the Census Bureau cannot continue collecting information to update the census results through the Count Question Resolution (CQR) operation — or any other operation. CQR can only correct errors that occurred during the processing of information collected during the decennial enumeration.”* ([2020 Census Count Question Resolution Operation \(CQR\)](#)).

Consideration of a New Program

The inability to address Group Quarters deficiencies in the decennial census through CQR does not mean that these problems could not be dealt with in a separate program, one with a focus on correcting the base used for the population estimates over this decade. The Census Bureau’s own language in its announcement of the final *Federal Register* Notice supports such an idea:

“However, federal law (13 U.S.C. § 6) also authorizes the Census Bureau to acquire and use current demographic data for Census Bureau programs. Based on stakeholder feedback that was part of the 60-day FRN for CQR, the Census Bureau is investigating the feasibility of a program aimed at collecting population information for specific types of Group Quarters, information that could be used to support ongoing programs such as Population Estimates and the American Community Survey. Final decisions on this new effort will be announced in a separate FRN that would include information about the scope and timing.” (2020 Census Count Question Resolution Operation (CQR)).

Indeed, since publication of the final Notice seeking clearance for the CQR Operation, the Bureau has announced a proposed new program created for the express purpose of improving the base for calculating population estimates over the next decade, **a move that can help ensure a more equitable distribution of federal resources to localities**. We applaud this promising step; however, a new program should go beyond the geographic misallocation and processing errors of data already collected in the census, to reflect a more expansive scope that allows for the inclusion of Group Quarters facilities and populations, as well as related housing unit populations (beyond GQ) that were missed in the enumeration (such as college students living in private housing off-campus) and can be verified and captured via administrative data from higher education institutions, public housing agencies, skilled nursing facilities, and other reliable sources.

Structure/Scope of a New Program

1. Allow state, Tribal, and local governments or their designated representatives to review counts of **Group Quarters facilities** by type for census blocks. The Census Bureau should consult with governmental partners, as well as experts in administrative data, to determine which Group Quarters types are in scope. Important Group Quarters types to consider include those hit especially hard by the pandemic — for example, skilled nursing homes, prisons, jails, colleges, and universities.
2. Allow state, Tribal and local governments or their designated representatives to review the **population counts of Group Quarters facilities** by type for census blocks. The Census Bureau should consult with governmental and institutional partners, as well as experts in administrative data, to determine whether high-quality administrative records exist to capture missing GQ populations.
3. Given the special issues that have surfaced about difficulty enumerating college and university students in private (non-GQ) off-campus housing, the Census Bureau should investigate the feasibility of allowing state, Tribal and local governments or their representatives to submit high-quality administrative records for the purpose of

improving the count of students residing off campus on April 1, 2020. This would build upon the Census Bureau's previous effort during the data processing operation to elicit such records from colleges and universities as a means of completing the census enumeration.

4. Given the special issues that have surfaced about the difficulty of enumerating apartment-dwellers in general, the Census Bureau should also investigate the feasibility of allowing state, Tribal and local governments or their representatives to submit high-quality administrative records for the purpose of enumerating other housing unit populations beyond GQ.
5. Consider ways to mitigate possible undercounts of people living in service-based locations due to the nearly six-month delay in the enumeration of these facilities. Many localities have reliable administrative records on their service-based populations, including people staying in shelters for people experiencing homelessness or visiting mobile food vans. Moreover, the service-based enumeration populations may have changed between April 1 and late September 2020, when the Census Bureau enumerated this population at pre-identified locations. This should make selected parts of the SBE population eligible for review and correction based on administrative records verification submitted by state, Tribal and local governments or their representatives. These alternative datasets could include attendance or program utilization records for service-based enumeration locations — counts that will likely differ from September enrollment/participation dates used by the Census Bureau. We recognize that the actual dates for the SBE likely varied in a number of cases, and a discussion needs to take place regarding the best use of local administrative records to help make the enumeration more accurate for these populations.

Thank you for your attention to our concerns and consideration of our views. Please feel free to reach out to [Rose?] at [email address] should you have any questions.

Sincerely,

Bloomberg Associates Census Cities Cohort