



**DEPARTMENT OF CITY PLANNING
CITY OF NEW YORK
POPULATION DIVISION**

November 28, 2021

Dr. Robin A. Pennington
Supervisory Mathematical Statistician
U.S. Census Bureau
Decennial Census Management Division
4600 Silver Hill Road
Washington, DC 20233

RE: Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; 2020 Census Count Question Resolution Operation. Federal Register Vol. 86, No. 207/Friday, October 29, 2021, pp. 59980-59982.

Dear Dr. Pennington,

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.

Count Question Resolution (CQR)

Count Question Resolution (CQR) is a formal Census Bureau program that provides an

Joseph J. Salvo Ph.D., Chief Demographer
Population Division
Department of City Planning
120 Broadway – 31st Floor, New York, N.Y. 10271-0001
(212) 720-3434
www.nyc.gov/population

opportunity for state, Tribal, and local governments to challenge their decennial census counts. It is the *only* mechanism by which jurisdictions can request corrections to their official 2020 Census results. It is a formal process whereby the Census Bureau “*reviews cases received to determine whether the 2020 Census count of housing (e.g., housing units and/or group quarters) and associated population has been impacted by any geographic or processing errors.*” (Federal Register, Vol. 85, No. 150 / Tuesday, August 4, 2020: 47162-65). Corrections made through the CQR Operation do not affect reapportionment or redistricting data and will not be reflected in official 2020 Census data products. However, corrections will improve subsequent official annual population estimates, which are used to guide the distribution of federal dollars for the next 10 years.

As it was defined in 2010 and currently planned for the 2020 Census cycle, the focus of the program is on housing units and Group Quarters — specifically, *geographic errors* such as housing units put in the wrong location and *processing errors* related to data already collected in the enumeration. Thus, the only population corrections that are currently admissible are those “associated with” corrected housing or Group Quarters mistakes, and not units or group facilities that were missed outright.

Efforts to Expand CQR

Given the difficult circumstances surrounding the 2020 Census, state, Tribal, and local governments have become more wary about data quality and more concerned about threats to the accuracy of their counts. Spurred by these concerns, the proposed 2020 Census CQR Operation, as outlined in the Final Notice in the *Federal Register* (Vol. 86, No. 207 / Friday, October 29, 2021: 59980-82), will draw significant interest from government officials – more than the program did in 2010. The very narrow scope of the 2020 program also 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 had been exploring ways to expand the 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 remediation 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)).

Thus, we applaud the Census Bureau for opening the door to state, Tribal and local input on a 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**. 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 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.

Capacity Building

1. Provide a technical assistance curriculum to state, Tribal and local governments.

Another fundamental concern for stakeholders is the capacity of all potential participants to conduct a thorough review within the purview of any new program. Local governments must review block-level data to ensure the most accurate counts possible. This will be a particular challenge for many Tribal and local governments with limited staff and expertise to review and evaluate the results of the 2020 Census for their jurisdictions. Limited capacity to participate in census review opportunities is not a new problem and needs to be addressed in concert with data user groups and local government associations. To address this concern, we strongly encourage the Census Bureau to work closely with the Federal–State Cooperative on

Population Estimates (FSCPE), the State Data Centers (SDC), and stakeholder associations, such as the Association of Public Data Users (APDU), National League of Cities, and National Association of Counties.

2. Empower FSCPE/SDC/State representatives to assist and/or submit inquiries on behalf of eligible governments, with appropriate permission.

Any new program should allow these entities to make submissions on behalf of Tribal and local governments, with appropriate permission from the jurisdiction affected by the review. State governments, Regional Councils of Governments (COGs), members of the FSCPE, and SDCs can help ensure equity in program participation and offer much-needed technical assistance and expertise to smaller governments. Moreover, it would be an important way for the Census Bureau to demonstrate its commitment to maximizing participation.

3. Work with key stakeholder groups to provide a resource with guidance for participation in the new program.

Guidance for stakeholders regarding how to navigate the new program successfully would be an essential part of ensuring the success of the program.

4. The Census Bureau likely will require more resources to execute a new program of the scope envisioned in these comments.

As part of any collaboration, the data user community needs to support the Bureau's efforts to obtain increases in the budget necessary for staffing any new program.

Sincerely,

A handwritten signature in blue ink, appearing to read "A. Peter Lobo".

A. Peter Lobo, Ph.D.
Chief Demographer, Population Division