



13 January 2022

Ms. Sheleen Dumas
Department PRA Clearance Officer
Office of the Chief Information Officer
U.S. Department of Commerce
1401 Constitution Ave., NW
Washington, DC 20230

Re: 2020 Post-Census Group Quarters Review

Dear Ms. Dumas,

On behalf of the Population Association of America (PAA) (www.populationassociation.org) and the Association of Population Centers (APC) (www.populationcenters.org), we are pleased to submit comments in response to a *Federal Register* Notice published by the U.S. Census Bureau on November 19, 2021 (Citation 86 FR 64896; Document Number USBC-2021-0025), setting forth a new **Post-Census Group Quarters Review (PCGQR)** program.

PAA is the premier professional, scientific society for more than 3,000 behavioral and social scientists—including demographers, sociologists, economists, epidemiologists, and statisticians—who study the causes and consequences of population change. Our members conduct research and train scientists at U.S. universities and independent research organizations. The APC is composed of approximately 40 federally funded, interdisciplinary population research centers nationwide. Our members are intimately involved in many methodological aspects of the decennial U.S. Censuses, including evaluating the design, collection, and results of the census and the substantive analysis of decennial census data. Our members conduct independent research and research training using data from the Census Bureau, work for or advise federal, state, local, and tribal governments on methodological and substantive issues with the decennial census, and disseminate census findings to policymakers, stakeholders, and the public. Given these important connections, our members have a high stake in ensuring the Census Bureau data products achieve the highest possible scientific standards.

We commend the Census Bureau for requesting public comment on PCGQR and for engaging state, local and tribal governments and their designated representatives to improve census data products. These efforts will improve the use of census data for scientific research, policymaking and planning, and achieving a just distribution of federal resources. However, there are certain elements of the program that are not yet fully specified or that could be improved. Our members have specific and significant concerns about missing or incomplete Group Quarters populations, such as college students living in private off-campus housing, prison populations, and residents in care facilities.

Suggestions for Improving the Scope and Effectiveness of PCGQR

In light of the unprecedented disruption to the 2020 Census Group Quarters Operation, which resulted in incomplete and inaccurate 2020 Census data for many localities, we also urge the Census Bureau to expand the scope of PCGQR and consider other program improvements.

1. The *Federal Register* Notice does not specify the types of Group Quarters (GQ) that will be within-scope for the program. We urge the Census Bureau to include *all* GQ types, *based on the availability of official administrative records*, as long as the administrative records are of high quality and demonstrate “usual residence” as of April 1, 2020 (or the date closest to April 1 in the case of student housing closed early due to the pandemic).
2. The Census Bureau has not applied differential privacy (a disclosure avoidance method) to the counts of Group Quarters **facilities**. The Census Bureau should make these counts available at the block level by type for use by entities that are considering a PCGQR submission. When reviewing the population counts, information on GQ facilities by type is essential to making determinations about what may be missing from the count in a block. For many GQ types, facilities are part of the “footprint” of a jurisdiction, which includes an inventory of structures that is kept for planning, taxation, and other purposes. As with the person-level data, information on the number of facilities should be presented by major type categories, as shown in Table P5 of the P.L. 94-171 file:

P5. GROUP QUARTERS POPULATION BY MAJOR GROUP QUARTERS TYPE [10]

Universe: Population in group quarters

Total:	P0050001	03	9
Institutionalized population:	P0050002	03	9
Correctional facilities for adults	P0050003	03	9
Juvenile facilities	P0050004	03	9
Nursing facilities/Skilled-nursing facilities	P0050005	03	9
Other institutional facilities	P0050006	03	9
Noninstitutionalized population:	P0050007	03	9
College/University student housing	P0050008	03	9
Military quarters	P0050009	03	9
Other noninstitutional facilities	P0050010	03	9

3. Early Nonresponse Follow-up (NRFU) operations for university and college dormitories, as well as neighborhoods surrounding campuses where students tend to live in private housing, were canceled when the pandemic caused many college students to leave their college-based housing before the term end. This caused an enumeration problem for two reasons: (a) students were not present in their dormitories on or around April 1; and (b) the definition of “usual residence” as of April 1, 2020, in dormitories needed to be clarified to make sure that it was applied correctly. In an effort to ensure that this was the case, the Census Bureau Director sent a letter to college and university administrators in the Spring of 2020, with instructions that read:

*“Students are to be counted at the address they reside while attending college rather than back home with their families. The census counts people—including college students—where they usually live as of April 1, 2020, **even if they left town early** because of a school closure or shift to distance learning.”* (Emphasis added)
<https://www.census.gov/newsroom/press-releases/2020/2020-college-students.html>

Further, the Director requested administrative records that indicated students' "usual residence" as of April 1, meaning that administrative records could be supplied for a time point immediately prior to the onset of the pandemic (i.e., before students left campus due to the pandemic). Like the request to college administrators, the Census Bureau should adopt these **same** definitions and standards in the PCGQR program for the submission of administrative records for *all* types of Group Quarters.

Finally, colleges and universities were focused on how to address the pandemic with appropriate guidance for staying on campus safely and remote learning procedures. Hence, many colleges and universities did not have the staff and time to respond to the Bureau's request for electronic transfer of student data. Thus, the uniformity and timing of responses from administrators varied greatly across the nation. State, local, and tribal governments, or their designated representatives, should be given an opportunity to help fill these gaps.

4. In addition to the request for administrative records for students residing in dormitories on campus, the Census Director also requested that college and university administrators provide records for enrolled students living **off-campus**:

"Today, I write to request your assistance in ensuring a complete and accurate count of the off-campus students enrolled at your school. Local Census Bureau staff will begin reaching out to your institution starting June 16 to discuss the collection of basic information about students who live off-campus, including local address information."

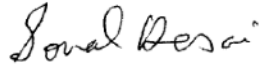
This request recognizes the fact that cancellation of Early NRFU and the early departure of students from college and university communities also affected residents of off-campus housing. Just as the Census Bureau deemed these records useful for enumeration in the closing weeks of the census, it should ask stakeholders to use their networks to gain access to records from college and university administrators. Doing so will improve the population estimates in ways that were not possible during the administration of the census due to challenges associated with the pandemic. Although not formally part of the GQ universe, the unique issues that have surfaced about difficulties in the enumeration of college and university students in off-campus housing warrant special attention. Thus, the Census Bureau should investigate the feasibility of allowing state, local, and tribal governments, or their designated representatives, to submit high quality administrative records for the purpose of improving the count of students residing off campus in the 2020 Census base used to develop intercensal population estimates for the next decade.

5. The members of the Federal-State Cooperative for Population Estimates (FSCPE) and other stakeholders should work with the Census Bureau to determine acceptable standards for admissible administrative records. This will help to improve the quality of accepted submissions and of the final data products.

To improve the effectiveness of the PCGQR program, we also urge the Census Bureau to engage with a variety of stakeholders and knowledgeable experts. The key constituency is of course state, local and tribal governments, which use census data extensively and have unique local knowledge and expertise. We also encourage the Census Bureau to consult with other knowledgeable stakeholder organizations such as the Federal-State Cooperative on Population Estimates (FSCPE) agencies, the State Data Centers (SDC), Association of Public Data Users (APDU), National League of Cities, and National Association of Counties. Our own organizations' members have expertise to offer the Census Bureau on these topics, through their participation in the aforementioned organizations but also through their service on Census Bureau National Advisory Committee and the Census Scientific Advisory Committee. Further consultation by the Census Bureau with our members through these and other avenues would be welcome.

Once again, thank you for giving the population research community an opportunity to comment on the proposed PCGQR program. We look forward to working with our federal partners to produce the best possible data products from the 2020 Census.

Sincerely,

A handwritten signature in black ink that reads "Sonalde Desai". The script is cursive and fluid.

Dr. Sonalde Desai
President, Population Association of America

A handwritten signature in blue ink that reads "Sara R. Curran". The script is cursive and elegant.

Dr. Sara R. Curran
President, Association of Population Centers