

Response to the Post-Census Group Quarters Review (PCGQR) 1-19-2021 Federal Register Notice

January 14, 2022

To whom it may concern,

Thank you for the opportunity to respond to this notice of a new Post-Census Group Quarters Review program (PCGQR) allowing local governments the opportunity to review and correct group quarters populations that might have been missed due to major disruptions to the usual Census count process in 2020. Writing as the Massachusetts liaison to the Federal State Cooperative for Population Estimates, I appreciate and applaud the Bureau's willingness to develop and offer this correction opportunity and to accept feedback on the details of how this program may be most effective for the communities needing to make corrections to their Census 2020 counts. Given this opportunity for response, I wish to make the following recommendations on the specifics of the PCGQR:

1. The initial FRN does not specify the **types of Group Quarters that will be in scope** for the program. I recommend that the Census Bureau includes *all* GQ types in this correction opportunity. Although some types might be deemed smaller or less common than the "major types" (dorms, nursing homes, and correctional facilities), even small types (such as homeless shelters or group homes) may have a large impact on the population of community, school district, or other program service area.
2. Along these same lines, I recommend that the Census Bureau **does not impose a minimum population threshold** for cases that may be submitted, but rather lets each local government or its designee determine whether a potentially missed facility is "worth" submitting a case for, relative to its impact on the community overall.
3. The current program notice reads that "the Census Bureau will conduct 2020 PCGQR case research by examining the census records for the 2020 tabulation block(s) identified in a 2020 PCGQR case using the Master Address File." Because the overall intent and spirit of this program, as I understand it, is to allow local governments to make corrections for group quarters that may have been missed or undercounted in the Census 2020 enumeration operations, the program needs to also specify that it will **examine administrative records and other evidence submitted for a case, whether a facility has an existing record in the Census Master Address File or not**. Any group quarters facility that was overlooked, missed, or undercounted in the 2020 count should

be eligible for review and inclusion if evidence supports that it existed and included population on the reference date of April 1, 2020 (or closest other date in the case of student housing that was evacuated during the pandemic). At minimum, a facility that was submitted by a local government or its designee during Census 2020 preparation opportunities -- including *Geographic Support Service Initiative*, *Local Update of Census Addresses*, *Census New Construction Program*, and *Census Count Review Program* and the *CRP supplemental* submission of additional GQ types that many FSCPE members made on behalf of their states -- must be eligible for review and reinstatement. The current FRN states that “When a submission is received, the Census Bureau will conduct research and assess the records contained in that submission for quality” but does not anywhere state what these records are, aside from “the census records” described above.

4. Related to the above, the Census Bureau will need to **specify and define the types of records** that will be accepted in a review case as the program is announced so that researchers have adequate time to assemble these records and to understand what they are to assemble. The Census Bureau made us of “high quality administrative records” to enumerate some of the population in the Census 2020 count, and should be able to offer guidance and examples on what constitutes a high quality administrative record for the purpose of a PCGQR case submission.
5. **Counts of group quarters facilities by type** have been collected by the Census Bureau and are not subject to differential privacy for the purposes of disclosure avoidance. These counts need to be available at the block level by type for use by jurisdictions that are considering making 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 data, information on the number of facilities should be presented by major type categories, as shown in Table P5 of the PL 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

6. **The opportunity to correct the population counts of already-enumerated facilities** should be included in this program. College dormitories in particular are at risk of over-count or under-count based on confusion around the April 1, 2020 count date. While the Census Bureau specified in its instructions that students who were evacuated prior to April 1, 2020 due to campus closures should have been counted, nonetheless there was room for much miscommunication or misunderstanding around this request, and a count that is incorrect based on this misunderstanding should be eligible for correction in this post-census review.
7. **The opportunity to correct the demographic characteristics of an enumerated group quarters population** in cases where characteristics look very inconsistent with available information on facility residents, for example if block consisting only of nursing homes shows a large number of children or if a block consisting only of college dormitories shows a large concentration of elderly population.
8. **Off-campus college students:** *Early Non-Response-Follow-Up* (ENRFU) operations for university and college neighborhoods were canceled due to pandemic-related operational delays, compounded by many college students leaving their campuses and “college-towns” early. Not only were many students not in their “usual residence” dorms on April 1, 2020, off-campus students were also at high risk of an undercount. With ENRFU cancelled, and NRFU delayed, any non-responding college students who typically reside in near-campus housing units would not have been visited until the summer or late summer, when most would have been living elsewhere anyway. International students who left the country before enumeration would not even have been able to self-respond via the internet, due to restrictions on international IP addresses in that response mode. Although not formally part of the GQ universe, the special 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 needs to investigate the feasibility of allowing state, local and tribal and governments to submit high-quality administrative records for the purpose of improving the count of students residing off campus. If such a correction opportunity cannot be included in the context of the PCGQR, then the Bureau should consider corrections or revisions to the persons-per-household and occupancy rates that are applied in their post-Census annual estimates and which are normally based solely on the decennial Census count results.

9. 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 counting **other housing unit populations beyond GQ** that were overlooked as vacant in the 2020 enumeration. These might include administrative data from local housing authorities that administer subsidized housing programs.

The 2020 Census faced unprecedented challenges that evolved rapidly and affected so many components of Census count operations. Even given the tremendous and excellent effort by the U.S. Census Bureau to adapt and respond in real time to these unanticipated challenges, the post-Census period provides an essential opportunity to address some of the known issues that resulted from the great disruption in business as usual. I thank you once again for the opportunities provided by this critical new program and for the opportunity to provide feedback on its development.

Best regards,

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and Massachusetts liaison to the Federal-State Cooperative for Population Estimates