

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

Dear Ms. Dumas:

I am 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.

My comments are organized by three topics: comments on the scope, on who can file a case and on what happens with the cases filed.

Comments on the scope of the program

- **All Group Quarters types should be in scope**
The FRN doesn't mention whether some or all Group Quarters are in scope of this program. I urge the Census Bureau to consider cases for ALL Group Quarters
- **Source of error should not disqualify a PCGQR case**
The GQ data collection didn't go without hick-ups. Errors were made on the side of the Group Quarters and on the side of the Census Bureau. I know of examples where the Census Bureau field worker clearly asked for the wrong numbers, but in all confusion about what numbers to provide there might also be Group Quarters that provided the wrong numbers. I urge the Census Bureau to not use the party who made the error to decide whether or not to accept a case.
- **Count Question Resolutions (CQR) cases should be in scope**
Because this program and CQR have much in common, I would urge the Census Bureau to accept cases under this program that could also be filed under CQR. This would make it a lot easier on the stakeholders as they don't have to deal with figuring out under what program to file and don't have to deal with different formats and requirements for filing. The Census Bureau PCGQR program should be able to forward CQR cases to that program and not burden the filer with that forward.
- **Errors in GQ type or HU/GQ designation should be in scope**
The purpose of the program is described as correcting errors affecting Group Quarters. This should include errors in Group Quarters type and wrongfully counting facilities as housing units or as Group Quarters. Group Quarters designation and type definition influences how these facilities are handled in the estimates program, in surveys and in some universe definitions like non-institutional population and universe of people for whom poverty is determined. A case where for example a nursing home facility is counted as a complex of housing units should be considered for correction and so should a Nursing home that is mistakenly counted as a group home for adults.
- **Errors in count of number of residents should be in scope**
To avoid filing of cases where the discrepancies are the result of noise added as part of the Disclosure Avoidance System, the Census Bureau could set thresholds, for example the discrepancy should be at least 10 persons and 10% of the redistricting data for the GQ population in a Census block.

Comments on who can file a claim

- **Open the program for more stakeholders**

Just like Count Question Resolution, this FRN list tribal, state, and local governmental units as organizations that can file requests for review. There are however many more stakeholders that can benefit from correction of errors. In Albany County, NY for example there is a jail that is in the right governmental unit, but in the wrong School District. I think it is an undue burden for the School District or the jail to convince either the town, the county or the state to file a request for review when they notice this error. Title 13 U.S.C. Section 6 allows for a wide range of sources for data that can be used in this program.

I urge the Census Bureau to open this program up to wider variety of stakeholders, e.g.:

- Special districts, like school districts or community district that receive funding based on population counts
- Group Quarters administrators. They are most likely involved in either the filing of a case or in the review of a case. To streamline the process, a direct way for GQ administrators that notice errors would be an opportunity to notify the Census Bureau directly.
- Long standing Census Bureau partners like Federal State Cooperative on Population Estimates (FSCPE) and State Data Centers (SDC)
- Licensing agencies. For example, Departments of Health that issue nursing home licenses should be able to file cases based on data in their possession

Comments on results from the PCGQR

- **A more accurate base for the postcensal estimates is not listed as one of the benefits**

I think a more accurate estimates base is the most important reason for many to participate as a more accurate estimates base leads to more accurate population estimates leads to more accurate uses of that estimates data, whether it is control for surveys or distribution of funding

- **Legal status of certified population count corrections**

The CQR program FRN states "Corrections made by this operation will result in the issuance of new, official 2020 Census counts for use in future programs requiring official 2020 Census data" The PCGQR program FRN states "The Census Bureau will issue certified population count corrections, which governmental units can use for any purpose requiring their official Census counts."

Is there a legal difference between those two? My understanding of why new data could not be used in the CQR is that that new, official 2020 Census counts could not be based on new information. A better explanation about legal differences would be appreciated.

- **Certified population count corrections as a motivator**

The stated goal of the PCGQR is to correct errors in the Group Quarters data. That might be the goal for the Census Bureau and I agree with that goal, but for local governments a certified population count correction might be the only motivator and that might not always line up with the stated goal.

Sincerely,

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