

1/14/2021

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

I am writing on behalf of Claritas in response to a Federal Register Notice (FRN) published by the U.S. Census Bureau on November 19, 2021 (Citation 86 FR 64896: Document Number USBC-2021-0025). Claritas is a private data company that provides nationwide demographic estimates for a range of small and large geographic areas in the United States. Misplaced, miscounted, or omitted group quarters (GQ) facilities and/or population can severely impact the quality of our products. When reading the FRN about the upcoming PCGQR program several questions came to mind that might help shape the scope of the program:

How will the Census Bureau make available the results of the PCGQR activities? No detail was given about the information that will be available on the 2020 PCGQR website. In the Notes and Errata available after the 2010 census CQR activities, each change was described with corrected counts of housing units and/or population down to the block-level. I would recommend the same information be provided to the public during the PCGQR process including the count of GQ facilities by type and the GQ population by characteristics.

Although the focus of the program might be the GQ facilities and population that were missed, I have heard instances of facilities being placed in adjacent blocks which leads to a miscount at a small geographic level. It would be helpful if the PCGQR results indicated if the corrected counts are the result of an addition or a relocation, and if a relocation, from where the facility was relocated.

What will the effect of differential privacy (DP) be on the PCGQR process? Although the count of GQ facilities by type are not altered during the DP process, it is my understanding that changes to population counts, including GQ population, are a part of the DP process. If an authority identifies an undercount at a particular facility, how will the PCGQR process differentiate between an error and the effects of DP? I would recommend differentiating between the misplacement of population due to omissions and undercount and those due to the implementation of DP.

Will information also be available on the characteristics of the population who were added or removed from an area due to an incorrect count? If GQ population is added to a block group, what does it do to the race, ethnicity, sex, and age composition of that block and the larger geographic area? I recommend including as much demographic detail as possible during the PCGQR process.

Information from the 2020 decennial census will continue to be used as a base for our estimates and projections and being able to integrate the corrections from the PCGQR process at a small level of geography and with demographic detail will be important to anyone hoping to make use of information collected during the PCGQR process. I hope that when developing the PCGQR process you will retain and make available as much detailed information as possible about the decisions made and the resulting changes to the population and facilities.

Thank you for your consideration,

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