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January 18, 2022

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

Dear Ms. Dumas:

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.

We applaud the Census Bureau for opening the door to state, local, and tribal governments to improve the base for calculating population estimates over this decade, an action that can result in a more equitable distribution of federal resources to localities and more accurate data for important planning purposes at all levels of government. We also find that there are certain elements of the program that are not yet fully specified or that could be improved.

Elon is home to Elon University and the student population here makes up more than 50% of our total population count. The University requires only first and second year students to reside on campus, and due to their limited dormitory housing capacity, more than half of their students reside in off-campus housing, mostly within Elon's jurisdiction. There are also a number of "hybrid" housing opportunities, including privately-owned apartment complexes where the University holds master leases to ensure availability for students. With the Covid-19 Pandemic rapidly broadening its impact in the early weeks of 2020, and spring break typically occurring in the second week of March, many students resumed their studies for the period that included the April 1st Census reporting deadline from their parent's homes out of state, either not returning to Elon following spring break, or leaving in the weeks that followed to finish their semester via virtual learning opportunities provided by the University in response to the health crisis.



Elon, like other communities, closely tracks our annual population counts provided by the N.C. State Demographer, due to the significant impact to sales tax revenue distributions throughout our County, which are population-based. This tracking for the decade beginning with the 2010 Census indicated a moderate yet relatively steady increase year-to-year, with the 2020 estimate reaching 12,186. However, the 2020 Census set our number at 11,336. Using our annual estimates certified by the State Demographer, we have to return to pre-2016 to find a number this low. The loss of revenues that will be represented in this anomaly is extremely significant. It is our desire and expectation to participate in the PCGQR process, and by doing so, to unveil discrepancies and evidence of undercount that will shed some light on why our population appears to have taken such a dramatic and sudden drop.

Suggestions for improving the scope and effectiveness of PCGQR

In light of the unprecedented disruption to the 2020 Census Group Quarters Operation, resulting in incomplete and inaccurate 2020 Census data for many localities, including Elon, we 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 in-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 closest April 1 date 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 jurisdictions that are considering a PCGQR submission. When reviewing the population counts, information of 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 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 early. This caused an enumeration problem for two reasons: 1) students were not present in their dorms on or around April 1; and 2) 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 state, local and tribal governments for the submission of *all* administrative records.

Finally, colleges and universities were focused on how to address the pandemic with appropriate guidance for staying on campus safely and remote learning procedures. Moreover, many did not have the staff and time to respond to the Bureau’s request for electronic transfer of student data in the midst of a public health crisis. Thus, the uniformity and timing of responses from administrators varied greatly across the nation. State, local, and tribal governments 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 is in recognition of the fact that cancellation of Early NRFU and the early departure of students from college/university communities affected residents of off-campus housing just as much as it affected those living on-campus. Just as the Census Bureau deemed these records useful for enumeration in the closing weeks of the census, it should ask state, local, and tribal governments to use their networks to gain access to records from college and university administrators, to improve the population estimates in a way that was not possible during the frenetic pace of the census, especially at the height of a 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 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) should work with the Census Bureau to determine acceptable standards that need to be applied for admissible administrative records. This should provide for more high-quality, successful submissions and a reduction in the number of submissions based on data and/or considerations that are out-of-scope. Because some states have underfunded or lower capacity FSCPE members, and to avoid inequitable outcomes, the Census Bureau should also reach out to 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 for guidance in setting the quality standards for acceptable administrative records.

Capacity building

To improve the likelihood of effective participation in the PCGQR program, we also urge the Census Bureau to consider the following suggestions:

- 1. Provide a technical assistance curriculum to state, local, and tribal governments.**

A fundamental concern for stakeholders is the capacity of all eligible participants to participate meaningfully in 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 local and tribal governments with limited staff and expertise. Limited capacity to participate in census review opportunities is not a new problem and should be addressed in concert with data user groups and local government associations. The Census Bureau needs to work closely with key stakeholder groups to provide





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guidance on how governments can best navigate the requirements of this new program and maximize their opportunities for a successful review. This outreach and consultation should include the Federal-State Cooperative on Population Estimates (FSCPE) agencies, 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, to ensure that all governments can seek review of their 2020 Census results if they so choose.

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

Any new program should allow these and similar entities to submit challenges or requests for review of 2020 Census results on behalf of local and tribal governments, with appropriate authorization 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, this type of flexibility would be an important way for the Census Bureau to demonstrate its commitment to maximizing participation.

Thank you for your consideration of our views on the proposed PCGQR program. Please feel free to contact me at pdesoto@elon.gov or (336) 584-2859 should you have any questions about these comments.

Sincerely,

Pamela DeSoto
Assistant Town Manager/Planning Director
Town of Elon

