



January 18, 2022

Dear Sir or Madam:

The City of Greenville, North Carolina would like to comment on the need for the PCGQR program. As many places, Greenville has known undercounts and are in need of every possible outlet to verify our population count. The City of Greenville, NC is home to East Carolina University. The 2020 Census reported 3,550 Group Quarter numbers of a known 5,211 beds. The City needs a program to review these numbers and any other Group Quarters.

Thank you for the opportunity to comment on 86 FR 64896, the 2020 Post-Census Group Quarters Review (2020 PCGQR). Because of the unique circumstances occurring during the 2020 Census enumeration, we feel that a program such as the PCGQR will be critical to correct potential issues with Group Quarters (GQs) population counts and characteristics. To ensure best results, we recommend that the Census Bureau:

- Include all GQ types within the PCGQR scope;
- Allow for the review and inclusion of GQs whether a facility has an existing record in the Master Address File (MAF) or not;
- Allow for corrections to race/ethnic, sex, and age characteristics of the population within PCGQR challenges based upon administrative records; and
- Include the FSCPE and SDC as resources for the submission of PCGQR cases.

While the current Count Question Resolution (CQR) is useful for correcting some issues, the program is very limited in scope and will not address potential issues we have uncovered in our review of the 2020 Census enumeration. Under the CQR program, which has been used for prior censuses, the *CQR provides corrected counts for housing units and population counts existing as of April 1 of the decennial year when the decennial census record shows that a housing unit or its associated population was identified during the enumeration, but erroneously excluded from or included in the census count due to a processing error.*

It is crucial to have as accurate a view as possible of the GQ population. Multitudes of federal and state funding formulas rely on the Census Bureau's post-census estimates, like the annual population estimates, American Community Survey, and other survey-based estimates. These estimates also serve as the basis for planning for schools, roads, utilities, business, and other purposes. In addition, state and local governments and other planning entities produce population estimates and population projections that rely on the decennial census. Some GQs house special populations (prisons, university dormitories, military barracks, nursing homes) that may have different needs and demands for services than the household population. To plan properly it is necessary to know the number and characteristics (age, race/ethnicity) of these GQ populations.

In our preliminary review of the 2020 Census results, we have uncovered potential issues with the enumeration of GQs. While relatively small in scope for our state population, the issues can be highly problematic for estimating population and socioeconomic characteristics for small areas, which depend on this information. If broad enough in scope, we believe the PCGQR and current CQR programs will help ensure accurate post-census estimates for local areas.

We recommend that the Census Bureau include all Group Quarter types within the PCQR scope. We want to especially recommend that military barracks be included within the scope of the PCGQR. The 4th largest military population lives in

North Carolina and military installations from all branches are located within the boundaries of many of our municipalities. We hope that the PCGQR will provide a means for correction to any issues relative to these GQs populations.

Administrative records can provide evidence that GQs facilities were present on April 1, 2010 and provide information on the number, and sometimes, characteristics of the population. The existing CQR process only allows for changes to the census counts when the Census Bureau finds an error in the processing of the enumeration. There may be some cases where, for a variety of reasons, a facility was not included in the MAF and would thus not be subject to the current CQR review. We suggest that the PCGQR allow for such review if sufficient evidence can be provided.

In addition to corrections to population totals, we feel it necessary to include in scope corrections to characteristics of the population within facilities. Because of the unique nature of GQ facilities, administrative records are available for reference. Racial/ethnic, sex, and age characteristics for some of these facilities differ substantially from the proximate population and if not accounted for, can contribute to errors in subsequent population estimates and projections.

Finally, given our unique role as representatives of the Federal-State Cooperative for Population Estimates and the State Data Center network and our knowledge of and access to administrative records necessary under the scope of PCGQR, we suggest that the FSCPE and SDC programs be included as resources for the submission of PCGQR cases.

Thank you for your consideration of these recommendations and for your work in ensuring that the census data serves our people and decision-makers in the best way possible.

Sincerely,

City of Greenville