

January 18, 2022

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 grateful to have the opportunity to provide comments in response to the 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.

I commend the Bureau for its commitment to furthering state, local, and tribal governmental units' desire and attempts to improve the base for calculating population estimates, which will serve as the official estimates for the next decade. It is my sincerest hope that this process will make the distribution of resources and the recognition of local voices more equitable and accurate as we move through the decade and life cycle of the 2020 Census and population estimates.

We have seen local concerns regarding the accuracy of group quarter (GQ) counts across the spectrum of group quarter types and throughout the geographic extent of the state. These concerns were exasperated due to the understandable but unfortunate cancelation of the second count review event that was scheduled to have occurred as the world first became aware of the COVID-19 pandemic. While the cancelation of that review was understandable, it is now evident that the lack of external review by individuals with local knowledge hampered, in a real and visible way, the execution of the group quarters count. Obvious examples of the questionable GQ statistics that could have been fixed include: the existence of misplaced and phantom GQ facilities; GQ facilities that are simply missing; and published statistics that make it impossible to ascertain if individual facilities were counted at all.

One issue that is of particular concern, in many areas that have institutions of higher education, is the degree to which the operation to count individuals living around college and university campuses was successful. Prior to the beginning of counting for the 2020 Census, members of the Federal-State Cooperative for Population Estimates (FSCPE) submitted a large amount of geographic data that identified areas around post-secondary institutions that had high concentrations of students. These areas were to be part of an "early non-response follow-up" operation, but the pandemic made that operation impossible to complete. Given the problematic counts around post-secondary campuses, I would encourage the Bureau to utilize those data submitted and the expertise of the FSCPE to perform a robust review of the count around or post-secondary institutions. This

includes those off-campus housing units that have not been part of the traditional GQ universe, but given their nature could be.

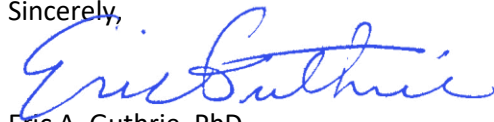
Concern is not only about the GQ counts around college campuses, however. In reality, the GQ counts for all facility types are of grave concern to many in the data user community. For that reason, I would further encourage the Bureau to release counts of GQ facilities by type at the block level to allow local leaders to better assist the Bureau in improving the GQ counts and by extension the population estimates that are so important to an almost countless number of programs which rely on them annually.

Fortunately for all concerned parties, the Bureau already has a strong working relationship with a group that has members in almost every state and territory that can aid in most aspects of this proposed program. I would encourage the Bureau to utilize the FSCPE and to empower the FSCPE to investigate and coordinate local submissions on behalf of local governments so that the burden of participation in this new program is not borne solely by local officials who may or may not have the time and/or specific expertise to successfully assist the Bureau to improve the local counts.

Additionally, I would encourage the Bureau to give this program the time and attention it will require to be truly successful. This will include providing local leaders and units of government the resources and appropriate training necessary to identify and submit problems that they may uncover in the GQ data.

Thank you for your consideration of my views on the proposed PCGQR program. Please feel free to contact me at eric.guthrie@state.mn.us or 651-201-2474 should you have any questions about these comments.

Sincerely,



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