

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:

The City of Atlanta is 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. This action can result in a more equitable distribution of federal resources to cities such as Atlanta and more accurate data for important planning purposes at all levels of government. However, we also believe some aspects of the program are not yet fully specified or could be improved; therefore, we recommend several ways to expand or clarify parts of the program.

Atlanta's college group quarter count for the 2020 census reports a count of only 22,683 students, while Atlanta has the highest concentration of colleges and universities in the southern United States. Atlanta includes campuses associated with two of its largest schools that are part of the University System of Georgia. Georgia State University and the Georgia Institute of Technology account for more than 60,000 students.

Atlanta is also home to the Atlanta University Center that includes four of the oldest and most celebrated historically African-American colleges, Spelman College, Morehouse College, Morris Brown College, and Clark Atlanta University.

In addition, there are several other nonprofit private universities in Atlanta. Among them is the largest private university in Georgia, Emory University, which boasts one of the highest-rated health care systems in the Southeast.

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 Atlanta, we also urge the Census Bureau to expand the scope of PCGQR and consider other program improvements.

1. All Group Quarters types should be eligible for review under the new program. 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. Share block-level Group Quarters facility counts with cities to improve effectiveness of PCGQR submissions. 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 on 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.
3. Clarify that college students should have been counted at their school-based residence as of April 1, 2020, even if they left campus before that date due to the pandemic. Early Nonresponse Follow-up (NRFU) operations for university and college dormitories and 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. 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.” <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. Extend the PCGQR program to cover college students who were living “off-campus” in private housing (and enrolled in college) in the Spring 2020 semester, and permit cities to assist higher education institutions in submitting reliable administrative data identifying housing units where students were living off-campus until the pandemic prompted them to return to their “homes” before they could be enumerated at their college-based addresses. During the 2020 Census, 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. Leverage the knowledge of the FSCPE network and other scientific and municipal associations to set appropriate quality standards for accepting administrative data under the PCGQR program. 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 under the PCGQR program. 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.

I appreciate your consideration of our views on the proposed PCGQR program. Please feel free to contact Rashad Taylor at rtaylor@atlantaga.gov should you have any questions about these comments.

Sincerely,

Rashad Taylor
Senior Policy Advisor
City of Atlanta - Office of the Mayor