

January 18, 2022

Sheleen Dumas  
Department PRA Clearance Officer  
U.S. Department of Commerce  
1401 Constitution Ave., NW  
Washington, DC 20230

Submitted by email to [DCMD.PCGQR@census.gov](mailto:DCMD.PCGQR@census.gov)

**RE: Post-Census Group Quarters Review**

Dear Ms. Dumas:

I am writing on behalf of the Metropolitan Council of the Twin Cities to submit comments on the proposed Post-Census Group Quarters Review (PCGQR) program (Docket # USBC-2021-0025).

The Metropolitan Council is the regional planning agency and Metropolitan Planning Organization that serves the seven-county region surrounding Minneapolis and St. Paul. Among our responsibilities, we produce demographic forecasts and annual population estimates used for state government purposes.

We appreciate the Census Bureau's renewed attention to errors and omissions in the 2020 Census data for group quarters and institution-affiliated populations. We are concerned that facility closures and other disruptions of Census's contacts with data reporters in 2020 did cause some facilities to be undercounted, or entirely missed. We would have preferred to address these issues during the Count Review Operation in 2020. Unfortunately, the Group Quarters phase of CRO was sharply curtailed; the opportunity to add new group quarters facilities was eliminated. We therefore urge the Census Bureau to design the PCGQR program so that the program *at minimum* accommodates the kinds of changes that would have been allowed, if the Census Bureau had followed the CRO operational plan.

We are further concerned that off-campus populations were partly missed, as many off-campus residents left their local housing in March 2020, did not return prior to the end of school year leases, and therefore never received 2020 Census mail communications or follow-up visits.

We have five main requests for the design and criteria of the PCGQR program:

1. We urge the Census Bureau to authorize the PCGQR program to consider all types of Group Quarters as within scope. We understand cases may only be actionable where case submitters can provide high-quality administrative records, or where the Bureau itself already has such administrative records.

2. We urge the Census Bureau to authorize the PCGQR program to also consider off-campus “student apartment buildings” that are substantially (or entirely) occupied by college- or university-affiliated populations. We understand cases may only be actionable where case submitters can provide high-quality administrative records about the occupants of such buildings, or where the Bureau itself already has such administrative records. We expect this is viable as Census Bureau in 2020 collected from colleges and universities their data files of both on-campus and off-campus students.

We expect many off-campus “student apartment buildings” were missed by 2020 Census’s Nonresponse Followup operation as such buildings were mostly vacant in Spring and Summer 2020.

3. We urge the Census Bureau to allow broad consideration of errors and omissions that can be detected and demonstrated. We know that a parallel program, the Count Question Resolution (CQR) program is authorized to “correct only errors that occurred during the processing of information.” We request that the scope of PCGQR include, at minimum: errors and omissions that occurred during the collection and/or processing of information collected during the 2020 enumeration and/or preparations for the 2020 enumeration.
4. The Federal Register Notice states that “the Census Bureau will conduct 2020 PCGQR case research by examining the census records for the 2020 tabulation block(s) identified in a 2020 PCGQR case using the Master Address File.” We urge the Census Bureau to remove *ex ante* scope limitations based on the Master Address File (MAF). We expect there were some group quarters facilities missed in entirety. Therefore the Census Bureau should authorize the PCGQR program to create MAF *errata* corrections for group quarters facilities that were missed; these should be eligible for PCGQR remedy if evidence supports that facilities existed and included population on (or proximate to) April 1, 2020.
5. We urge the Census Bureau to specify and define the types of records that will be accepted in a PCGQR case when the program is announced, so that case submitters have adequate time to assemble these records.

Regarding the eligibility to submit cases and issues to PCGQR, the Federal Register Notice restricts participation to state governments, tribal governments, and general-purpose local governments. To improve the likelihood of effective participation, we urge the Census Bureau to also allow state, tribal, and local governments to delegate PCGQR participation to partner entities that may be better prepared to identify count discrepancies and assemble substantiating data. Delegated entities could include members of the FSCPE and SDC networks, Regional Councils of Governments, Metropolitan Planning Organizations, or registrars or institutional research offices of colleges or universities. The option to delegate this role is especially important to smaller governments with limited staff resources. Such flexibility would be an important way for the Census Bureau to demonstrate its commitment to maximizing participation.

Finally, to assist case submitters, the Census Bureau should publish facility counts – that is, the number of group quarters facilities, by type of group quarters – for every census block, and provide this data resource to interested governments and partners. These facility counts have not yet been published. (This is distinct and different from the group quarters population, which is found in Table P5 of the 2020 Census Redistricting Data File.)

Thank you for your attention to these comments. We recognize the importance of this new operation to ensuring and remedying the accuracy of 2020 Census results. We can be reached by email: [todd.graham@metc.state.mn.us](mailto:todd.graham@metc.state.mn.us) or by U.S. mail: Todd Graham, Metropolitan Council, Research, 390 North Robert Street, St. Paul, MN 55101.

Sincerely,

A handwritten signature in blue ink, appearing to read "Todd Graham".

Todd Graham  
Principal Researcher

A handwritten signature in blue ink, appearing to read "Matthew B. Schroeder".

Matt Schroeder  
Principal Researcher