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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 Ave., NW
Washington, DC 20230

Dear Ms. Dumas:

The National League of Cities (NLC), which represents America's 19,000 cities, towns and villages, is pleased to submit comments in response to a *Federal Register* Notice published by the U.S. Census Bureau (Citation 86 FR 64896; Document Number USBC-2021-0025), setting forth a new Post-Census group quarters Review (PCGQR) program.

NLC applauds the Census Bureau for opening the door to local 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.

NLC represents many college and university towns across the nation that suffered from a possible undercount of their group quarters. In Athens, Ohio, home of Ohio University, students left campus in droves when the pandemic hit, and before enumeration day (April 1, 2020). Athens has identified a census block with a population of 0 for the block. The block includes an apartment complex with 855 permitted occupants and is typically 95 percent occupied.

Athens, Ohio is not unique in the undercount of group quarters. Another example is East Lansing, Michigan, home of Michigan State University. Census tracts containing group quarters such as fraternities and sororities show far less population than in 2010, even though enrollment is up, and East Lansing's city staff is aware that occupancy was nearly 100% on April 1, 2020. In one example, the census block count in East Lansing dropped 72 percent from 2010 to 2020. The Decennial Census shows a 1.7 percent decline in population for East Lansing from 2010 to 2020 even though East Lansing grew by thousands of housing units in that period.

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 local governments, especially university and college towns, NLC also urges 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 that will be in-scope for the program. NLC urges the Census Bureau to include all group quarters, 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.
2. 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.”

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. Like the request to college administrators, the Census Bureau should adopt these same definitions and standards in the PCGQR program for local governments for the submission of all administrative records.

Finally, universities and colleges 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. Local governments should be given an opportunity to help fill these gaps.

3. In addition to the request for administrative records for students residing in dormitories on campus, the Census Director also [requested](#) that university and college 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 university and college 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 local governments to use their networks to gain access to records from university and college 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 group quarters universe, the unique issues that have surfaced about difficulties in the enumeration of university and college students in off-campus housing warrant special attention. Thus, the Census Bureau should investigate the feasibility of allowing local 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.

Thank you for your consideration of NLC's views on the proposed PCGQR program. Please feel free to contact Michael Gleeson, Legislative Director, Finance, Administration and Intergovernmental Relations at gleeson@nlc.org or at (202) 626-3091 should you have any questions about these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Clarence E. Anthony', with a long horizontal line extending to the right.

Clarence E. Anthony
CEO and Executive Director
National League of Cities