



Dedicated the promotion of cooperation between the states and the U.S. Census Bureau

January 4, 2022

Dear Sir or Madam,

Thank you for the opportunity to comment on the Federal Register Notice 86 FR 64896 for the 2020 Post-Census Group Quarters Review.

We applaud the Census Bureau for initiating this program. We recognize the difficult circumstances under which the Census 2020 took place and also understand the limitations of data collection allowable through the Count Question Resolution program.

The proposed 2020 Post-Census Group Quarters Review, if wide enough in scope, could greatly benefit the Census Bureau's population estimates and products that depend on them.

The Federal State Cooperative for Population Estimates (FSCPE) Steering Committee would like to take this opportunity to point out the special role the FSCPE membership can play within this program.

Utilizing the special role of the FSCPE

1. Special role of the FSCPE

The FSCPE members are assigned by their state to represent their respective states in a cooperative with the Census Bureau to increase the effectiveness of the Population Estimates.

The memoranda of agreement (MOA) between the U.S. Census Bureau and the FSCPE State representatives contains the following paragraph:

"Because the decennial census is the estimate base of all population and housing unit estimates, both POP at the Census Bureau and the FSCPE state members recognize the importance of collaboration on decennial census programs. Therefore, this partnership also extends to the preparation for the decennial census. Due to the relationship between the FSCPE and POP related to housing units and group quarters, this relationship is important in supporting the Local Update of Census Address program, the Group Quarter Review program, the

Count Review Program, and other programs at the Census Bureau that are instituted to ensure the success of the decennial census. At the Census Bureau's request, FSCPE state members will provide feedback and support these decennial programs according to each state's ability to contribute or participate. The Census Bureau will provide training when necessary. And when budget allows, the Census Bureau may provide funding for select programs.”

This means that a special program that benefit the Population Estimates fits within the FSCPE MOA and can count on the support of the FSCPE members and the states they represent.

2. The FSCPE provides the Census Bureau with annual data on Group Quarters

As part of the Census Bureau’s estimates production cycle, the FSCPE members collect annual data on Group Quarters resident populations. We are familiar with the Group Quarters in our state and the people and systems that can provide resident counts for many of the GQs.

3. Earlier request for review of Group Quarters data

In a March 1st 2021 email to Associate Director Fontenot and Assistant Director, the FSCPE steering committee offered assistance from the FSCPE membership in a Count Review-like program as we recognized the challenges of the GQ enumeration. Many of the members had already prepared for the Count Review GQ event that got cancelled. These resources are still available to most FSCPE members.

4. GQ quality issues in the redistricting file

Several FSCPE members have raised issues with Group Quarters data in the redistricting file. They have documented cases where there is Group Quarters population in the data, but there is no known Group Quarters facility in that block or any neighboring blocks. Others document cases of missing Group Quarters, even after confirming or telling the Census Bureau in earlier operations that those Group Quarters were there. There are also reports that there was miscommunication to facilities about the adjusted resident rules during the GQ enumeration efforts.

5. More effective with access to title 13 protected data

Access to title 13 data is essential to do a thorough review of the data collected for the Group Quarters as only then program participants can match the GQ facilities with the GQ counts. Most FSCPE members participated in earlier programs that involved access to title 13 protected data which would minimize the burden of attaining the special sworn status required.

6. Improved estimates as incentive

The incentive for local governments to participate in this program might be biased towards only participating when there is a chance to increase the population numbers. For the FSCPE members the incentive is improving the estimates and, with that, the other products that rely on the estimates.

We would welcome a discussion about details on how a special role of FSCPE members can be implemented within this program.

With highest regards,

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