



STATE OF WASHINGTON

OFFICE OF FINANCIAL MANAGEMENT

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April 19, 2022

Ms. Sheleen Dumas
Department PRA Clearance Officer
Office of the Chief Information Officer
U.S. Department of Commerce
1401 Constitution Ave., NW
Washington, D.C. 20230

Dear Ms. Dumas:

Washington State's Office of Financial Management is pleased to submit comments in response to a *Federal Register* Notice published by the U.S. Census Bureau on March 22, 2022, (FR Doc. 2022-06038) setting forth a new *Post-Census Group Quarters Review (PCGQR)* program.

As we stated in our response to the first federal register notice on the 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 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 have some concerns about aspects of this program that have not been fully specified.

- The Federal Register states "Revised GQ population counts will be provided to the Census Bureau's Population Estimates Program where they will be included in the baseline data used to produce upcoming annual population estimates. Corresponding changes to demographic characteristics will be incorporated into subsequent rounds of estimates." It is not clear in the Federal Register what will be included in the formal response. Will the formal response to a successful PCGQR case include the adjusted population and demographic characteristics of that adjusted population? We would encourage the Census Bureau to provide both the adjusted population and its demographic characteristics in the official determination letter as there are many other applications for it use beyond the Population Estimates Program and the American Community Survey.
- Successful Count Question Resolution (CQR) cases will not result in an adjustment of the demographic characteristics of that adjusted population. We would encourage the Census Bureau to use the PCGQR program to provide a formal adjustment of the demographic characteristics of successful CQR cases. Again, there are many data users beyond the Census Bureau who would benefit from this information. If there are disclosure avoidance concerns about providing this information, we would suggest that the Census Bureau consider releasing demographic characteristics for adjustments over a certain threshold for example for adjustments over 50.

OFM has identified errors in the group quarter count for several jurisdictions in the state. We are hopeful that some of these will be corrected through the CQR operation, but if not, hopefully the corrections will be made through the PCGQR program for the benefit of the Census Bureau's population estimates

program, the ACS, and other applications. Here are the group quarter errors that we have identified so far that we hope will be addressed by CQR and/or PCGQR:

- **Ellensburg, WA:** The dorm group quarter count for Central Washington University was 2,131 lower than administrative records from the university show.
- **Wenatchee, WA:** The Wenatchee Valley College dorm was missed. There were no dorms captured in the city or residential housing captured within the relevant block. The administrative records count for this dorm in 2020 was 67.
- **North Bonneville, WA:** An unknown “Other noninstitutional facility” was located within the boundaries of North Bonneville, WA with 408 total population. This facility raised the population from 965 to 1,397 and added considerable racial and ethnic diversity to this city. The block where the Census Bureau located the group quarter is uninhabited according to the city and county officials.
- **Bonney Lake, WA:** A single unknown “Other noninstitutional facility” with 737 people was in the city. There are no large group noninstitutional group quarters within Bonney Lake that could account for this group quarter.
- **Tumwater and Olympia, WA:** The Thurston County Jail population was counted at the mailing address rather than the physical address. Olympia’s population count was 223 higher and Tumwater’s count was 223 lower as a result.

We would like to stress again that it is important to provide corrections not only to the total population but also to the characteristics. Many group quarters, either their inclusion or omission, have profound impacts on the characteristics of those communities. Providing the adjusted characteristics to the public will help improve the accuracy and quality of the statistics developed for impacted communities.

Additional Suggestions for improving the scope and effectiveness of PCGQR

The 2020 Census experienced unprecedented disruptions to numerous operations. Considering those impacts we again urge the Census Bureau to expand the scope of the PCGQR program to address the following areas:

- We are concerned that this review does not include provisions to revise the college student population residing off campus. It is evident that the off-campus student population in many communities were not enumerated. This was most evident in Washington State at Central Washington University (Ellensburg, WA) and Washington State University (Pullman, WA).

The guidance for enumerating college students was as follows:

*“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.”* (Emphasis added) <https://www.census.gov/newsroom/press-releases/2020/2020-college-students.html>

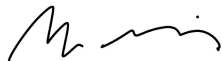
The early departure of students from college/university communities affected residents in off-campus housing just as much as those living on-campus. Although not formally part of the GQ universe, the unique issues that have surfaced about difficulties in the enumeration of college and

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 population estimates for the next decade.

- We also suggest that the Census Bureau consider allowing revisions to the transitory locations and housing unit counts that do not meet the criteria of the CQR operation. Significant housing was identified through the 2010 Census, LUCA, New Construction, and/or the 2020 Census Group Quarters (GQs) and Transitory Locations (TLs) Update program but not counted in the 2020 Census. The following cases illustrate issues we have found in Washington State:
 - South Prairie, Washington has an RV park that was not fully enumerated in the 2010 or 2020 censuses. The city informed the Census Bureau about this RV park and OFM shared its address and location through the 2020 Census Group Quarters and Transitory Locations Update program. According to the city planner there are over 100 RVs with full time residents living within the RV park and three housing units outside the park (which you can clearly see-through GIS imagery). In the end the Census only enumerated 19 units and 40 population for the block. This compares to a 2019 estimate of 349 people living in the RV park. Due to the undercount in this block nearly half the population of this city was missed in the 2020 Census.
 - Black Diamond, Washington had a new development (Ten Trails; <http://www.tentrails.com>) where permit records indicated that 218 housing units had a completion date of April 1, 2020, or earlier. However, the Census Bureau only enumerated 107 units in that development. If it can be shown through quality administrative records that these housing units existed, the housing and population counts should be revised through this program for population estimate purposes.

Thank you for your consideration of our comments on the proposed PCGQR program. If you have questions about our response, please contact Mike Mohrman, State Demographer, at 360-902-0602 or by email at mike.mohrman@ofm.wa.gov.

Sincerely,



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