



August 27, 2020

MEMORANDUM FOR: Dr. Steven D. Dillingham
Director
U.S. Census Bureau

A handwritten signature in black ink that reads "Mark Zabarsky".

FROM: Mark H. Zabarsky
Principal Assistant Inspector General for Audit and Evaluation

SUBJECT: *2020 Census Alert: The Census Bureau May Not Accurately Count College and University Students Living Off-Campus During the 2020 Census*
Final Memorandum No. OIG-20-044-M

The Office of Inspector General (OIG) is issuing this 2020 Census Alert to bring to your attention our concerns—about the accuracy and use of data collected from enumerating college and university students living in off-campus housing—that require immediate attention. Delays and changes to 2020 Census operations as a result of the coronavirus 2019 (COVID-19) pandemic have presented further risks to an accurate and timely count of this portion of the population.

During our review, we did not identify any significant issues with the enumeration of college students living on-campus. However, we found that the Census Bureau (the Bureau) has been undercounting off-campus student households. Additionally, the Bureau's efforts to collect data on off-campus students from college and university administrators will not mitigate the risk of an inaccurate count, because the Bureau does not have a final plan in place to use these off-campus student data. Furthermore, any finalized plans will need to consider the completeness and usability of off-campus student data.

Background

How college and university students are enumerated. The purpose of the decennial census is to conduct a count of the population and its housing and to disseminate the results to the President, the states, and the American people.¹ The goal of the 2020 Census is to count everyone once, only once and in the right place, as of April 1, 2020, known as Census Day.

¹ The U. S. Constitution empowers Congress to carry out the census (Article I, Section 2) and requires "counting the whole number of persons in each state" (Amendment XIV, Section 2). Since 1790, the United States has conducted a census every 10 years. Data collected during the decennial census provides vital statistics for the nation. Census data are used, among other purposes, to apportion the seats of the U.S. House of Representatives; redraw congressional districts in each state; and allocate billions of dollars each year in federal financial assistance.

For the decennial census, students will be counted via one of two different field operations, depending on where they normally live or stay:

- Those students who live **on-campus**, in college- and university-owned housing, are counted through reporting from college and university administrators (during the group quarters enumeration, or GQE, operation).
- Other students, who live **off-campus** in private housing not owned or managed by the college and university, are counted directly from their households (during the nonresponse followup, or NRFU, operation).

Students living off-campus can also be counted via self-response by submitting their responses online, by mailing a paper form, or over the phone via Census questionnaire assistance (CQA). Self-response, which started on March 12, 2020, had been scheduled to end July 31 and is now scheduled to end on September 30.

According to Bureau guidance, students who live away from home should be counted at the on- or off-campus residences where they live most of the time—even if they were home on April 1, 2020, because colleges and universities were closed.

Pandemic-related changes to enumerating off-campus students. The ongoing COVID-19 pandemic reached the United States in January 2020. On March 13, 2020, the President declared a national emergency. Starting in mid-March, a significant number of colleges and universities across the country canceled in-person classes, required students to leave campus, and resorted to online learning for the remainder of the academic year.

The Bureau recognized that college and university students living off-campus may have returned home for summer break without having filled out their questionnaires, thus adversely impacting self-response data collection. To increase the likelihood that students and faculty members living in geographic areas surrounding colleges and universities were counted where they lived on Census Day, the Bureau had planned to conduct early NRFU from April 9 to July 24, 2020. However, by that time, many students had left their college campuses before 2020 Census questionnaires were delivered and before the start of early NRFU. Consequently, the Bureau canceled the early NRFU operation as part of its decision to delay field operations.

Challenges in Enumerating College and University Students Living Off-Campus

1. The Bureau has been undercounting off-campus student households

The Bureau has concerns that students living in off-campus housing units will not be counted at those locations as of Census Day. The Bureau performed a preliminary analysis of 2020 Census total response data to determine whether (1) it was receiving fewer off-campus responses than expected and (2) off-campus housing units were smaller than expected. The Bureau concluded that—for responses received through August 4, 2020—it had received fewer responses from off-campus

housing units than expected, which indicates undercounts at college and university towns.

2. The Bureau does not have a final plan in place to use off-campus student data

After the cancellation of early NRFU, the Bureau requested from college and university administrators roster data on off-campus students to help enumerate them. On June 15, 2020, the Bureau sent a letter to 1,365 college and university administrators, requesting roster information for off-campus students—including full name, date of birth, and local address information. On June 16, the Bureau began contacting college administrators to obtain these data. As of August 21, the Bureau had contacted 1,377 schools—of which 695 indicated that they would provide the requested data and 524 indicated that they would not—and had received off-campus data files from 597 of those schools.²

Bureau officials informed us that they are tentatively planning to combine off-campus student data collected from college administrators with other administrative records to enumerate nonresponding off-campus college households, and are trying to assess how to integrate the needed changes into existing systems. However, the Bureau noted that it is still has not made a final determination of how, or whether, these data will be used.

Additionally, Bureau officials responsible for the post-processing operation (i.e., the stage at which the Bureau makes its final determination of where a student is counted) informed us that, as of August 13, 2020, there are no finalized plans in place outlining how the Bureau will use the off-campus roster data that it is collecting. While the Bureau intends to integrate off-campus data with other administrative records, the Bureau cannot be sure that it will be able to do this, given its shortened time frame for post-processing.

If the Bureau is not able to use the off-campus data collected to help enumerate students, there is a significant risk that college students will not be counted at their college and university locations. This would result in population undercounts, which could have significant consequences for college and university towns at risk of losing federal funding that is distributed based on population.

3. When a plan is finalized, concerns about off-campus student data quality may inhibit the Bureau's use of data

In order to make off-campus student data usable, the Bureau must first format and standardize them. Part of the process the Bureau plans to use to help it enumerate off-campus households (person-name matching) is dependent on a set of critical

² As of August 21, the Bureau had formatted 276 of the 597 files received from college and university administrators.

matching variables such as full name, birth date, local college address, and home address.

Notably, in July of 2020, the Bureau's initial analysis of a sample of off-campus student data files received from colleges and universities found that 18 percent of the files did not provide date of birth. Because the Bureau relies on this critical attribute for person-name matching, the missing information limits the Bureau's ability to use the data as planned. This may result in counting students in the wrong location. These results further underscore the need for the Bureau to take additional measures to ensure that college students are counted at their off-campus locations.

On August 14, 2020, we briefed Bureau management on the results of our fieldwork. The information found in this memorandum summarizes the results of our work. We are issuing a series of 2020 Census Alert memorandums to bring to the attention of the Bureau and its stakeholders immediate concerns with the 2020 Census that we have identified during our ongoing oversight. We prepared this memorandum in alignment with OIG's quality control standards and the CIGIE Quality Standards for federal offices of inspector general, which require that we conduct our work with integrity, objectivity, and independence.

We are not requesting a formal response to this 2020 Census alert memorandum, as the key issues discussed in it were briefed to cognizant Bureau officials in advance of issuance. This memorandum will be posted to our public website.

If you have any questions or concerns about this memorandum, please contact me at (202) 482-3884 or Terry Storms, Division Director, at (202) 482-0055.

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