

**Congress of the United States**  
**Washington, DC 20515**

August 12, 2020

The Honorable Dr. Steven Dillingham  
Director  
United States Census Bureau  
4600 Silver Hill Road  
Washington, DC 20233

Dear Dr. Dillingham:

We write to reiterate our ongoing concern regarding the full and accurate enumeration of college and university students across the Commonwealth of Massachusetts in the 2020 Census. While we appreciate your stated commitment to achieving an accurate Census and appreciate your response<sup>1</sup> to our prior letter,<sup>2</sup> we ask that you confirm that the U.S. Census Bureau intends to utilize college and university directory information for both on-campus and off-campus students that has been provided to you by these institutions in Massachusetts and across the country.

Communities across the United States face unprecedented challenges due to the COVID-19 pandemic, including those with large populations of college students. In addition to dealing with the public health emergency, college towns in Massachusetts suffered economic losses when universities closed to prevent the spread of COVID-19 on college campuses. Not only do these towns rely on the patronage of students, they rely on the allocation of shared resources, representation, and funding based on the enumeration of individuals in the community. As you know, many college towns have significant undercounts so far due to coronavirus-caused campus closures, which prompted many students to leave these towns temporarily.<sup>3</sup> We are deeply concerned that the effects of the COVID-19 pandemic will be compounded for years to come if students are undercounted in the 2020 Census. It is imperative not to lock these municipalities into an artificial and unwarranted lack of representation and resources for the next decade.

As we wrote in our March 23, 2020, letter, we believe that the traditional method of data collection through individual student surveys could result in a drastic undercount of students who resided in Massachusetts during the 2019-2020 academic year.<sup>4</sup> While students in college-

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<sup>1</sup> Letter from U.S. Census Bureau Director Dr. Steven D. Dillingham to Senator Elizabeth Warren, July 1, 2020, <https://www.warren.senate.gov/imo/media/doc/CensusResponse7.1.20.pdf>.

<sup>2</sup> Letter from Massachusetts Congressional Delegation to U.S. Census Bureau Director Dr. Steven Dillingham, March 23, 2020, <https://www.warren.senate.gov/imo/media/doc/2020.03.23%20Letter%20to%20census%20bureau%20re%20counting%20college%20students%20during%20closures.pdf>.

<sup>3</sup> NBC News, "COVID-19 Turned College Towns into Ghost Towns and Businesses are Struggling to Survive", Wilson Wong, July 13, 2020, <https://www.nbcnews.com/news/us-news/covid-19-turned-college-towns-ghost-towns-businesses-are-struggling-n1233521>.

<sup>4</sup> Letter from Massachusetts Congressional Delegation to U.S. Census Bureau Director Dr. Steven Dillingham, March 23, 2020,

managed housing are typically counted by the Census in the Group Quarters Enumeration Operation, students in off-campus and private housing units are normally directed to complete individual surveys for their households as of April 1, 2020.<sup>5</sup> In your response to our March 23 letter, you wrote that you are now asking colleges and universities to submit records for off-campus students.<sup>6</sup> Colleges and universities in Massachusetts and across the country are now working to provide this information, in line with applicable federal privacy laws. We have been doing what we can to aid these efforts, including sending a letter urging college and university presidents to cooperate with the Census Bureau and provide this information.<sup>7</sup> However, the Census Bureau has not yet determined how it will use the directory information provided by colleges and universities through this process.<sup>8</sup>

We appreciate the Census Bureau's efforts to count Massachusetts's entire population, including students who would have been living there as of April 1, 2020. Given the ongoing effects of the COVID-19 pandemic and resulting school closures, we seek your assurance that students living both on and off campus will be counted via colleges' and universities' directory information provided to the Census Bureau. We therefore urge you to reaffirm your commitment to a full and accurate enumeration of students in Massachusetts by including the directory information you receive from institutions in the Commonwealth and across the country in the final U.S. Census counts for each state.

This step is particularly necessary now that you have announced that the Census Bureau "will end field data collection by September 30, 2020"<sup>9</sup>—four weeks earlier than expected, in a highly controversial decision that has raised concerns from many quarters.<sup>10</sup> Especially if the Census Bureau is aiming to complete the Census enumeration so soon, we strongly urge you to use all information available to you, including directory information supplied by colleges and universities, to ensure an accurate count.

Thank you for your consideration of this urgent matter. We look forward to your response.

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<https://www.warren.senate.gov/imo/media/doc/2020.03.23%20Letter%20to%20census%20bureau%20re%20counting%20college%20students%20during%20closures.pdf>.

<sup>5</sup> U.S. Census Bureau, "College Towns Depend on Accurate Count of Students Living in Area", America Counts Staff, Updated March 16, 2020,

<https://www.census.gov/library/stories/2020/01/student-housing-off-campus-with-parents-college-students-count-2020-census.html>.

<sup>6</sup> Letter from U.S. Census Bureau Director Dr. Steven D. Dillingham to Senator Elizabeth Warren, July 1, 2020,

<https://www.warren.senate.gov/imo/media/doc/CensusResponse7.1.20.pdf>.

<sup>7</sup> Letter from Massachusetts Congressional Delegation to College and University Presidents Regarding Census Response, July 9, 2020,

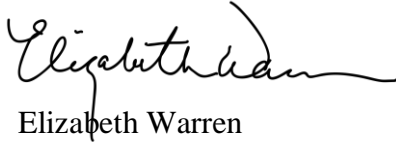
<https://www.warren.senate.gov/imo/media/doc/2020.07.09%20Open%20letter%20to%20college%20%20university%20presidents%20re%20Census%20response.pdf>.

<sup>8</sup> Possible uses for off-campus student data include reducing contacts during the follow-up phase, removing duplicate records from the parent's address, and adding students to the Off-Campus Enumeration. Census Bureau, "2020 Census: Off Campus Student Records Collection," July 14, 2020.

<sup>9</sup> U.S. Census Bureau, "Statement from Director Steven Dillingham: Delivering a Complete and Accurate 2020 Census Count", press release, August 3, 2020, <https://www.census.gov/newsroom/press-releases/2020/delivering-complete-accurate-count.html>.

<sup>10</sup> New York Times, "With Census Count Finishing Early, Fears of a Skewed Tally Rise," Michael Wines and Richard Fausset, August 4, 2020, <https://www.nytimes.com/2020/08/04/us/2020-census-ending-early.html>.

Sincerely,



Elizabeth Warren  
United States Senator

Edward J. Markey  
United States Senator

Stephen F. Lynch  
Member of Congress

Joseph P. Kennedy, III  
Member of Congress

William R. Keating  
Member of Congress

James P. McGovern  
Member of Congress

Lori Trahan  
Member of Congress

Seth Moulton  
Member of Congress

Ayanna Pressley  
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Katherine Clark  
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Richard E. Neal  
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