



The Commonwealth of Massachusetts
Secretary of the Commonwealth
State House, Boston, Massachusetts 02133

William Francis Galvin
Secretary of the Commonwealth

October 14, 2020

Dr. Steven Dillingham
Director
U.S. Census Bureau
4600 Silver Hill Road
Washington, DC 20233

Dear Dr. Dillingham,

Thank you for your diligence in requesting and utilizing student directory information from colleges and universities to assist in the complete enumeration of the "off-campus" students associated with these institutions. We also appreciate your confirmation to Senator Warren on October 8th that the Bureau "will be using these records to assist in enumeration of addresses for which we have received neither a completed self-response nor an interview with a census taker that would indicate the address was occupied on April 1, 2020."

Given the unique circumstances around the Covid-19 displacement of this special population, however, we are seeking further clarification and assurances on how this data will be used to ensure a complete count.

- 1) Will an address be considered "counted" if a single self-response is completed for the address? Off-campus students commonly share their living quarters with multiple "housemates". We are concerned that an internet self-response from one student may deem the address as "counted" when there may have been one or more additional household members not responding and for which the self-responder is not providing information. What is the assurance that these additional household members are also counted?
- 2) If the address is "enumerated based on an interview with a census taker that (indicates) the address was occupied on April 1, 2020," what assurances can you provide that this method will account for students who would normally have been living there on April 1 2020 had it not been for Covid-19 closures?
- 3) In the above situation, to what extent are proxy interviews being used for population counts? We are especially concerned that building managers may only provide the name/s of the lease holder/s and not the full household roster.

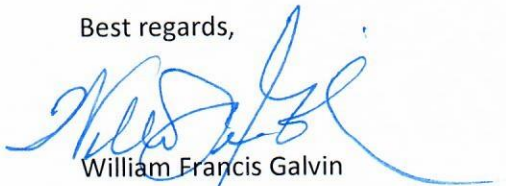
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- 4) What assurance do we have that the count gathered by a Census taker in the summer season, when NRFU and other field operations began, will be the same as the student population that would have been counted in an off-campus neighborhood on April 1 under normal circumstances? Even without Covid closures, the summer student population in college towns is much smaller than during the spring college semester, and the Fall 2020 student population is also significantly reduced in many colleges and universities.
- 5) What is the plan for capturing the count of off-campus international students who may have left the U.S. before the internet self-response and numerous other outreach campaigns were even initiated?

While we appreciate that the student directory is being utilized for non-responding addresses, we maintain that these data should *also* be used for both quality control and supplementation of household populations when the administrative or student directory information indicates that the complete population at an address may not have been fully enumerated - whether through self-response, Census-taker interview, or proxy interview.

Thank you again for your attention to this critical component of a full 2020 Census Count.

Best regards,



William Francis Galvin
Secretary of the Commonwealth
Census 2020 Massachusetts Liaison