

**OMB Question 1.**

***The cover memo says staff will recruit from a list identified by SHDGQT. Can Dawn or someone provide a fuller explanation of what the source is and how cases are identified?***

The Student Housing Definition Group Quarters Team (SHDGQT) will use two lists. First, a list of 146 Group Quarters (GQS) that were converted to housing units (HUs) by ACS field representatives sometime between January and October 2015. Second, a list of approximately 40 large, new “basic street addresses” (BSAs) with 200 or more individual units that have been flagged because an internet (Google) search has indicated that the BSA is a student apartment (either privately run or university owned). Further, decennial GQ staff, ACS GQ staff and a number of student housing subject matter experts from Population Division were not able to come to a consensus on the GQ-HU status of these BSAs when using the current GQ student housing definition.

CSM researchers will conduct additional internet research to narrow down the list to approximately 50 apartment complexes. When compiling this final proposed list, CSM will take into consideration a variety of factors, such as the following:

- (a) proximity to campus,
- (b) number of nearby apartment complexes,
- (c) college/university’s residential rules,
- (d) type of lease offered to students (individual or group lease),
- (e) student / non-student ratio residing at apartment complex,
- (f) college/university’s student enrollment size,
- (g) college/university’s private/public status, and
- (h) location of college/university (region of US, urban/rural).

CSM will present this shortened proposed list to the SHDGQT for review and comment. CSM recruiters will use the final approved list to schedule an interview with whoever manages the apartment complex and a second interview with a housing office manager at the nearby college / university.

**OMB Question 2.**

***Can someone confirm that the student housing GQ folks are speaking to NCES to leverage its expertise? We'd appreciate names on both sides of such a consultation.***

Census reached out to the Department of Education (DOE), the National Center for Education Statistics (NCES) and the Energy Information Agency (EIA) to determine under what circumstances, if any, these agencies consider off-campus apartment buildings to be student housing group quarters. We took into consideration their definitions and opinions when we created the research protocol for our forthcoming project, including the student housing definitions. On the following page, we describe in more detail the information we learned from these contacts / conversations.

## Census Bureau Contact with Other Federal Agencies Conversation Details

### Department of Education – Office of Postsecondary Education – Programs

- Census contact: Dora Durante
- Dora was guided to an online publication (“Handbook for Campus Safety and Security Reporting” at [www2.ed.gov/admins/lead/safety/handbook.pdf](http://www2.ed.gov/admins/lead/safety/handbook.pdf)) which offers guidance on complying with updated reporting requirements regarding safety and security-related instances on and near college campuses that receive federal funds<sup>1</sup>.
- Handbook includes C.F.R. definitions for “on-campus student housing facility” (34 CFR 668.41(a)) and non-campus buildings or property (34 CFR 668.46(a)).
- Handbook explains various conditions when the university is to include the non-campus building (third-party contracts or mixed-use apartments) and when they can exclude it (preferred leasing) from their reporting statistics.

### National Center for Education Statistics

- Census Contact: Dawn Nelson
- Tracy Hunt-White, Project Officer for the National Postsecondary Student Aid Study (NPSAS), explained that their three sample surveys (NPSAS, the Beginning Postsecondary Students Longitudinal Study, and the Baccalaureate and Beyond Longitudinal Study) do not delve into the type of off-campus housing; rather, they are more interested in whether they are living with their parents. Ms. Hunt-White reached out to Richard Reeves, thinking he may have relevant information for us.
- Richard Reeves, Postsecondary Branch Chief in the Administrative Data Division, explained that the housing definitions used in his area (off-campus housing, on-campus housing, off-campus (not with family), and off-campus (with family)) also do not delve into the type of housing facility.
- Mr. Reeves mentioned residential housing definitions are included in the “Postsecondary Education Facilities Inventory and Classification Manual (FICM): 2006 Edition” (<https://ies.ed.gov/pubsearch/pubsinfo.asp?pubid=2006160>). The manual did not delve into the type of residential housing.
- Mr. Reeves referred us to Eileen O’Brien at the Energy Information Agency.

### Energy Information Agency

- Census Contact: Dawn Nelson
- Eileen O’Brien, Lead of the Buildings Survey Statistics Team, offered the following definition for group quarters (which are in sample for Commercial Building Survey): “Living arrangement for institutional groups containing ten or more unrelated persons. Group quarters are typically found in hospitals, nursing or rest homes, military barracks, ships, halfway houses, college dormitories, fraternity & sorority houses, convents, monasteries, shelters, jails, and correctional institutions. Group quarters may also be found in houses or apartments shared by ten or more unrelated persons. Group quarters are often equipped with a dining area for residents.”
- Commercial Building Survey (CBECS) Survey Manager, Joelle Michaels, stated that when a housing unit has its own kitchen then it is an apartment and it is excluded from CBECS. When there is a common dining facility for an entire building, the building is considered to be a group quarter and is included in CBECS.”

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<sup>1</sup> “In 1990, Congress enacted the *Crime Awareness and Campus Security Act of 1990* (Title II of Public Law 101-542), which amended the *Higher Education Act of 1965* (HEA). This act required all postsecondary institutions participating in HEA’s Title IV student financial assistance programs to disclose campus crime statistics and security information. The act was amended in 1992, 1998 and 2000. The 1998 amendments renamed the law the *Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act* in memory of a student who was slain in her dorm room in 1986. It is generally referred to as the *Clery Act*. On Aug. 14, 2008, the *Higher Education Opportunity Act* or *HEOA* (Public Law 110-315) reauthorized and expanded the *Higher Education Act of 1965*, as amended. *HEOA* amended the *Clery Act* and created additional safety- and security-related requirements for institutions.” (page 1).