

June 15, 2020

Ms. Judy Belton  
Assistant Division Chief, Special Enumerations  
Decennial Census Management Division  
U.S. Census Bureau

Dear Ms. Belton,

We thank the U.S. Census Bureau for your willingness to meet with the higher education community last week. Per the discussion, we ask the U.S. Census Bureau to reevaluate the information it will request from institutions when it starts its outreach for off-campus student data. The U.S. Census Bureau and our nation's colleges and universities share an interest in a full and accurate census count and avoiding confusion that would frustrate this interest.

Based on the information you shared outlining what institutions will be asked to provide, we are greatly concerned the U.S. Census Bureau will be creating more confusion than clarity. Asking institutions to provide information they are not able to provide under the Family Educational Rights and Privacy Act (FERPA), absent the student's consent, goes [against directives](#) from the U.S. Department of Education's Student Privacy Policy Office (SPPO) on what institutions can provide to the U.S. Census Bureau, which is limited to directory information items.

We urge the U.S. Census Bureau review the list of directory information items that institutions are permitted to share, and accordingly revise its request to institutions to include only permissible items, such as name, address, and date of birth. In regards to the other non-directory information items of gender and race/ethnicity, we recommend the U.S. Census Bureau receive this information from institutions in aggregate form consistent with the directive from the U.S. Department of Education. We again urge you to provide formal guidance, in writing, articulating the request for off-campus enumeration collection.

Finally, we request that you reconsider the deadline date for institutions to provide off-campus information. Having differing deadlines will be confusing to institutions, with off-campus information requested in 4 weeks and group housing in August. Off-campus information has not previously been requested of institutions, which are now being asked to provide this information in a very short timeframe. There currently is limited staff on campuses and some institutions may need to reclassify what they deem to be directory information, which will require student notification and the ability for students to opt-out. As such, a 4-week timeframe is not realistic.



**American Association of Collegiate  
Registrars and Admissions Officers**

1108 16th Street, NW, Suite 400 | Washington, DC 20036  
(202) 293-9161 MAIN | (202) 872-8857 FAX | [www.aacrao.org](http://www.aacrao.org)

Again, we are in strong support of a full and accurate census. We hope that this feedback is well-received. We want to ensure that the U.S. Census Bureau will minimize confusion and align with U.S. Department of Education requirements on institutions and long-standing information request practices that the higher education community has followed for over 45 years.

Sincerely,

American Association of Collegiate Registrars and Admissions Officers  
American Association of State Colleges and Universities  
American Council on Education  
Association of American Universities  
Association of Catholic Colleges and Universities  
Association of Public and Land-Grant Universities  
National Association of Independent Colleges and Universities