



July 17, 2018

Ms. Jennifer Jessup
Departmental Paperwork Clearance Officer
Department of Commerce
Room 6616
14th St and Constitution Ave NW
Washington, DC 20230

RE: Comments on Proposed Information Collection on 2020 Census, Docket ID: USBC-2018-0005

Dear Ms. Jessup:

I am writing on behalf of People For the American Way (PFAW) to offer comments on the 2020 Census proposed information collection. Founded in 1981 by a group of civic, educational, and religious leaders, PFAW is a progressive advocacy organization grounded in the nation's ideals of freedom, equity, opportunity, and justice. Over its history, PFAW has conducted extensive education, outreach, legislative and regulatory advocacy, and other activities to make these values a reality in the lives of all people.

PFAW and its hundreds of thousands of members nationwide strongly support the principle that a representative democracy requires meaningful public participation and a full, fair, and accurate census count. PFAW is concerned, however, about the addition of a census citizenship question and its potential to jeopardize the accuracy of the census in all communities—an outcome that the nation will have to live with for the next decade. We urge the Department of Commerce to remove this question from the 2020 form.

Even before Secretary Ross's decision to include a census citizenship question, state and local officials and community leaders were deeply concerned about the difficulty of achieving robust participation from Black and Latinx households and other hard-to-count population groups. Black and Latinx people are no less deserving of freedom, equity, opportunity, and justice than any other segment of the American population. Yet the Black population was undercounted by more than 800,000 in 2010,¹ including seven percent of young Black children.² Latinx people

¹ Calculations based on "Census Bureau Releases Estimates of Undercount and Overcount in the 2010 Census." U.S. Census Bureau. Available at https://www.census.gov/newsroom/releases/archives/2010_census/cb12-95.html; "Table DP-1: Profile of General Population and Housing Characteristics: 2010: Census Summary File 1." U.S. Census Bureau, Retrieved 3 January 2018. Available at https://factfinder.census.gov/bkmk/table/1.0/en/DEC/10_SF1/SF1DP1.

² O'Hare, William P. "The Undercount of Young Children in the U.S. Census." Springer Publishers, 2015. Table 3.2, Page 34.

have also been disadvantaged by decades of undercounts, including the 2010 Census,³ and Latinx youth are among the most undercounted of all.⁴

The likelihood of undercounts and the harms they will sow are already heightened in the current political environment where Black and Latinx immigrants—indeed, all immigrants, both legal and undocumented—feel demonized and their families are torn apart. The census citizenship question will make immigrants even more reluctant to participate; in addition, it will drive up costs as the Census Bureau struggles to develop new communications and outreach strategies with little time remaining, plan for an expanded field operation, and track down millions of nonresponsive households. In sum, asking about citizenship status in a climate of fear and mistrust can only heighten suspicions, depress response rates, cost additional taxpayer money, and thwart the 2020 enumeration.

Not surprisingly, the census citizenship question has drawn intense opposition from a broad array of business leaders, state and local officials, social scientists, and civil and human rights advocates who know how much is at stake. This groundswell of opposition includes Republican and Democratic mayors,⁵ six former directors of the Census Bureau⁶ and two former Commerce Secretaries⁷ from Republican and Democratic administrations, civil and human rights groups,⁸ faith leaders,⁹ members of Congress,¹⁰ and many others representing diverse communities and political ideologies. All are united in their deep-seated concern that an untested citizenship question will compromise the census and jeopardize the quality and accuracy of data for all communities.

The collection of useful, objective data about our nation's people, housing, economy, and communities is vitally important. Not only is a nationwide census required by the Constitution, it is integral to our democracy, ensuring that district lines and political power are fairly drawn and allocated. The federal government uses census-derived data to direct federal assistance to states,

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⁴ O'Hare, William P. "The Undercount of Young Children in the U.S. Census." Springer Publishers, 2015. Table 3.2, Page 34.

⁵ <https://www.usmayors.org/2018/03/27/nations-mayors-to-secretary-ross-dont-politicize-census-remove-the-citizenship-question/>

⁶ https://www.washingtonpost.com/r/2010-2019/WashingtonPost/2018/03/27/Editorial-Opinion/Graphics/DOJ_census_ques_request_Former_Directors_ltr_to_Ross.pdf

⁷ <https://www.bloomberg.com/view/articles/2018-04-04/u-s-census-is-not-about-citizenship>

⁸ <http://civilrightsdocs.info/pdf/census/Census-Amicus-Brief-2018-06-18.pdf>;

<http://civilrightsdocs.info/pdf/policy/letters/2018/4-12-18-HSGAC-Coalition-Letter-Concerning-Citizenship-Question.pdf>; <http://civilrightsdocs.info/pdf/policy/letters/2018/4-12-18-OGR-Coalition-Letter-Concerning-Citizenship-Question.pdf>; <http://civilrightsdocs.info/pdf/policy/letters/2018/doj-citizenship-q-proposal-FINAL.pdf>

⁹ <https://religionnews.com/2018/03/28/faith-groups-condemn-citizenship-question-on-us-census/>

¹⁰ <https://www.schatz.senate.gov/press-releases/schatz-leads-amicus-brief-to-stop-the-trump-administration-from-including-untested-citizenship-question-in-census>

localities, and families. Census data also guide important community decisions affecting schools, housing, health care services, business investment, and much more.

Simply put, a full, fair, and accurate census is essential for all basic functions of our society. The 2020 Census should not include a citizenship question when scientific evidence indicates that it will undermine a successful count.¹¹ PFAW strongly urges the Department of Commerce to remove it from the data collection forms.

Sincerely,



Jen Herrick
Senior Policy Analyst

¹¹ <http://www.amstat.org/asa/files/pdfs/POL-CitizenshipQuestion.pdf>