



COALITION ON HUMAN NEEDS

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August 3, 2018

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

RE: Comments on Proposed Information Collection on 2020 Census, Docket number USBC-2018-0005
<http://www.regulations.gov>

Dear Ms. Jessup:

I am commenting on behalf of the Coalition on Human Needs (CHN), an [alliance of national organizations](#) including human service providers, faith groups, labor, civil rights, policy expert and other advocacy groups concerned with meeting the needs of low-income and vulnerable people. We have long understood the importance of the decennial census, since it not only produces counts that guide shifts in congressional and other electoral districts but also is used in conjunction with other Census Department surveys to set allocation levels for \$800 billion in federal program funds.

Many of these programs are specially targeted to assist low-income people, such as Medicaid, the Children's Health Insurance Program (CHIP), the Child Care and Development Block Grant, Temporary Assistance for Needy Families (TANF), the Section 8 Housing Choice Vouchers program, and the Special Supplemental Nutrition *Program* for Women, Infants, and Children (*WIC*). If some communities are undercounted, funding for them will not accurately reflect need in those communities.

In this request for comments, the Department of Commerce asks whether the questions and methods outlined are necessary and practical, whether they will improve the accuracy of the count, how to enhance the quality of the decennial count, and how to reduce the burden on government and responders alike.

In answering these questions, we must begin with our strong opposition to the inclusion of a question about citizenship in the 2020 Census. Such a question, as the Census Bureau's own research staff has determined, would make the Census less accurate and more costly. We will detail the evidence against including a citizenship question in paragraphs below. But we also want to highlight additional concerns about the likely undercount of children, especially children of color, those identifying as Hispanic/Latino, and those in low-income households. Even without the citizenship question, researchers have documented past disproportionate undercounts among these groups, which would be expected to

worsen in the 2020 Census without special efforts by the Census Bureau. We believe that the inclusion of a citizenship question will increase the likelihood of a substantial undercount among children. But even if no citizenship question is included, the Census Bureau must take additional steps to reduce the undercount among particularly vulnerable groups that will lead to inequitable distribution of funds and representation.

The 2020 Census should not include a citizenship question. In answer to the question the Commerce Department poses about whether questions are necessary and practical, we cite clear evidence that the citizenship question is not necessary within the decennial census and its belated inclusion poses tremendous practical concerns, as well as wasteful cost burdens on the federal government. The rationale for including this question in Secretary Ross' letter to Congress was that it was needed for enforcing section 2 of the Voting Rights Act. The Coalition on Human Needs joined in an [amicus brief](#) in the lawsuit by the State of California and several California cities against the inclusion of a citizenship question (*State of California V. Wilbur L., Ross, Jr*). That brief documents that there has not been a citizenship question in the decennial census since the enactment of the Voting Rights Act, and that data about the citizen voting age population (CVAP) has been available either through the long-form census survey distributed to a sample of the population until 2005, and since then through the American Community Survey, which the Census Bureau used to replace the decennial census long form. Collecting this data from surveys is considered more accurate than attempting to do it through the decennial count, because of large numbers of people who will not answer the question or answer it inaccurately. In recommending against inclusion of a citizenship question, the Census Bureau's Chief Scientist and Associate Director for Research and Methodology John Abowd concluded in a [memo to Secretary Ross](#) that it "would use substantially less accurate citizenship status data than are available from administrative sources." Further, Chief Scientist Abowd estimated that including a citizenship question would be impractical, because the expected lack of response would force more expensive follow-up contacts. He estimated conservatively that the follow-up contacts would cost at least \$27.5 million, based on the assumption that 630,000 households would require follow-up of three contacts each. However, he added "We expect that many more of these noncitizen households would receive six NRFU (*Non-Response Follow Up*) visits." If so, the cost would be commensurately higher. Inserting such a question with inadequate testing (and ignoring the results of what testing there was, which showed intense reluctance to complete the survey), is a recipe for significantly worsening the inaccuracy of the count.

The citizenship question will compound already existing problems of undercount among young children of racial and ethnic minorities and in low-income communities. In particular, the [net undercount among Latino children](#) through age 4 was 400,000 in 2010, a rate of 7.1 percent, compared to 4.3 percent for non-Latinos. The vast majority (94 percent) of these children are citizens, but because many live in mixed households, the presence of a citizenship question is likely to drastically worsen their undercount. It is important to note that the memo estimating a conservative \$27.5 million in additional cost to carry out more follow-up contacts assumed that adding a citizenship question would not affect responses among citizens. But [one in two Latino children](#) has a foreign-born parent. The inclusion of a

citizenship question will clearly affect many citizens in mixed-status households, making the numbers requiring follow-up higher, at greater cost.

The extent of the undercount will vary among different geographic areas. In the ten largest counties nationwide, the net undercount of young Latino children was 11 percent in 2010, far higher than the national average. These large counties tend to be poorer than the national average, so an undercount there will have the effect of reducing the share of funding for important federal programs in places where it is most needed. The U.S. national poverty rate for children under 5 was 21.3 percent in 2016. In some of the largest counties, the poverty rate for such young children was even higher: for example, in Los Angeles County, California, 22.8 percent; in Maricopa County, Arizona, 22.5 percent; in Miami-Dade County, Florida, 25.9 percent, and in Dallas County, Texas, 26.6 percent. *(Data from the Census Bureau's American Community Survey, 2016, 1-year estimates.)*

The Census Bureau should redouble its efforts to reduce the undercount among children. As noted above, even without the ill effects of including a citizenship question, the undercount among children, and especially among the youngest children, children of color, and low-income children, has been rising, while the count has been improving for other age groups. In 2010, the net undercount of children through age 4 was nearly 5 percent, or one million children. For Hispanic and African American young children, the [net undercount](#) was 6.5 percent, about twice the rate for non-Hispanic white children.

These children are harder to count because of the compounding factors of low income and living in complex households. In 2010, [nearly one-quarter](#) of young children lived in households of 6 or more people. Forty percent of young children overall lived in complex households, such as extended families together or those that include foster children; among African American young children, about one in two were in complex households; 55 percent of Latino children were in such households. In addition, in many households, heads of households may have limited English, which has also been shown to reduce responses to the Census, even though translations are generally available.

A Census Bureau [published report](#) found that in the 2010 Census, 44 percent of all children age 0-4 were in renter households, often in multi-unit buildings where households are more likely to be missed, compared with 32 percent of households with 10-17 year-old children. The report also found that 31 percent of households with young children were not counted by self-response, but instead required follow-up (that was true of 27 percent of households with 10-17 year-olds). It should be noted that the non-self-response percentages are high among households with older children, too, and that undercounts for children of any age are higher than undercounts of adults. But the undercount is worse for the youngest children.

Young children are also harder to count because they are disproportionately poor. Poor households are more likely to move frequently, and to include a mix of relatives and non-relatives, both of which are associated with an undercount.

All of these known factors require the Census Bureau to employ many strategies to find households with young children and to count everyone more accurately. However, both the move to online Census response and a lack of research aimed at identifying effective ways of reaching these hard-to-count

households will make improvements over past performance much more difficult. (Again, the inclusion of a citizenship question will drastically worsen these problems, basically ensuring that the count will miss large numbers of poor and minority children, with the consequence that they lose out on fair levels of federal support for services and resources in their communities.)

Threats to an accurate count:

Online Responses: While encouraging the population as a whole to respond to the Census online is an understandable strategy for reducing costs, it must be recognized that some of the most undercounted groups have less access to the internet than most Americans. That means resources must be sufficient to accommodate repeated follow-ups for those who do not fill out their form online.

In the [Final Report](#) of the Census Bureau's National Advisory Committee on Racial, Ethnic, and Other Populations, the Committee found that only 78 percent of households with incomes below \$30,000 use the internet, a proportion almost 20 percent lower than households with incomes of \$50,000 - \$70,000.

A recent [report](#) about roadblocks for Arkansas Medicaid recipients attempting to comply with new work requirements adds information about lack of internet access for low-income people. Among non-elderly adult Medicaid enrollees in Arkansas, 23 percent lack internet access, and another 30 percent lack broadband access (that is, they have smartphones but no online access through a home computer).

As noted above, even in the 2010 Census, 31 percent of households with the youngest children did not self-respond. With self-response being encouraged through the internet for the first time, it seems quite likely that the proportion of self-responding low-income households with young children will get lower still. The Census Bureau must anticipate a low initial response, and commit enough resources to ensure that low-income families and others in the hard-to-count groups are specially targeted for follow-up. That means conducting the research to know how to target radio ads, how to enlist trusted messengers who can reach hard-to-count families, including congregations, health clinics, child care centers and family day care providers, Head Start programs, schools, barber shops, hair salons, emergency food or shelter sites, food markets and other businesses, entertainers, sports figures, and other messengers research identifies. In order to develop effective outreach, social media can target people most likely to spread the word to others in their communities or extended families who do not have online access. Similarly, although the youngest children do not go to school, targeting schools may reach parents with older and younger children, to explain that they all should be counted.

It is troubling that out of [40 focus groups](#) conducted by the Census Bureau, none targeted parents and caregivers of young children. There still is not full understanding of why heads of households do not always include young children in the count. The Census Bureau should set up additional focus groups or other forms of research to learn more about why young children are not always included.

It is helpful that the materials most households will receive to solicit participation in the Census will now list "...all adults, children, and babies living or staying at this address," a more specific statement than the previous "...everyone living or staying at this address," on the chance that there is confusion about whether babies should be counted, or about whether multiple family units sharing living space should all

be counted. But such language will not be enough when families are distrustful or inadequately literate, or if they do not receive it in the first place because of frequent moves.

Distrust of the Census: So much of outreach depends on identifying trusted messengers, so it must be repeated that including a citizenship question will erase trust among communities that include many immigrants. Even now, we hear significant hesitation among community leaders and staff at social service agencies about whether to encourage people to fill out their census forms. There is real fear that the Census will be used to locate and detain undocumented people. If the citizenship question is not included, the chances of building or restoring trust among the community leaders needed to carry out effective outreach will improve. But in the current climate, the Census Bureau needs to know that it must undertake special education efforts to assure community leaders and trusted messengers that the Census is anonymous and will not be used to track down undocumented people or even naturalized citizens, some of whom have been targeted by other federal agencies for possible revocation of citizenship.

Ways to minimize the burden on respondents: We believe that the Department of Commerce and the Census Bureau must include in its definition of “burden on respondents” the anxiety that occurs from being asked to participate in a process that is distrusted as a threat. It is mandated by the Constitution that every person residing in the U.S. is counted, regardless of citizenship status. As a practical matter, the accuracy of the count of children will be significantly damaged if others in their household are afraid to participate. That leads inescapably to the need to eliminate the citizenship question from the decennial census. Even assuming the citizenship question is rejected, however, more work must be done to allay fears and dispel misinformation about whether the Census would be used for immigration enforcement purposes. The Census Bureau should be adding staff and advertising resources to carry out this effort in communities with larger numbers of immigrants.

In addition, knowing that young children in low-income and minority communities are more likely to be missed, the Census Bureau should redouble efforts to use administrative data to correct for the anticipated undercount. We know that much has been done to identify accurate sources of administrative data. In particular, an [analysis](#) by William O’Hare identifying the most promising administrative records for correcting an undercount of young children includes lists of Medicaid and SNAP recipients and the Numident file of people who have applied for a Social Security number. While lists of SNAP recipients are a promising source to adjust for an undercount, they must be collected separately from each state. We do not know how successful the Census Bureau has been in getting the agreement of states to share their data, but if agreements have not been reached in many states, the Bureau should redouble its efforts to make use of this data.

The burden on families with children to participate is lessened if the benefits in their community are explained to them in media outreach that reaches them and through trusted sources as determined by further research. Since public schools, child care centers, libraries, subsidized housing and health care providers all will receive more funds if all in their communities are counted, they have an incentive to share information with parents about how to participate in the Census, including perhaps making computers available for people to fill out the forms online. Faith, community and municipal leaders

should be encouraged to be messengers to the people in their communities about the reasons to be counted, and to explain that every person in their households, including the youngest children, should be listed. Businesses also benefit from having an accurate count so they can make decisions about possible expansion, and because more funding flowing into a community can indirectly result in more people being able to purchase their goods or services. The Census Bureau should reach out to supermarkets and other businesses to encourage signs and fliers to be available in places parents frequent and even kiosks with computers available for filling out the census form. We know the Census Bureau has engaged in these forms of outreach in past years, but a lot of additional effort will be needed for the 2020 Census, because the distrust of the federal government has grown.

Thank you for the opportunity to provide these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Deborah Weinstein". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Deborah Weinstein
Executive Director