



August 7, 2018

Ms. Jennifer Jessup  
Departmental Paperwork Clearance Officer  
Department of Commerce  
Room 6616  
14<sup>th</sup> and Constitution Avenue, NW  
Washington, DC 20230

Submitted via regulations.gov

RE: Comments on Proposed Information Collection on 2020 Census

Dear Ms. Jessup,

Philanthropy Northwest writes in response to the June 8 notice in the Federal Register requesting comments on the 2020 Census proposed information collection. We urge the Department of Commerce to withdraw the citizenship question from the 2020 Census questionnaire because we believe it will significantly undermine efforts to achieve a fair and accurate census in 2020.

Philanthropy Northwest is the nonpartisan regional philanthropy association of nearly 170 grantmaking institutions across Alaska, Idaho, Montana, Oregon, Washington and Wyoming. Spanning a wide range of funding priorities, sizes and scope, our members collectively represent nearly half of the region's philanthropic assets,<sup>i</sup> which each year advance the common good and improve the quality of life for millions of people across tribal, rural and urban areas in the Northwest.

We are committed to a fair and complete census count to ensure that our diverse communities can thrive. Reliable and accurate data are a necessary foundation for a well-functioning government, robust civil society and thriving business sector in the Northwest. For philanthropic institutions, the census provides demographic and socioeconomic data that drive informed, inclusive and effective decision-making — helping our members identify

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community needs and prioritize their grantmaking. The vast Northwest region includes many communities that are hard-to-count, and our members' nonprofit grantees serve those communities on issues such as education, health, poverty, the environment, arts and culture, and more. Indeed, the largest shares of philanthropic funding to the Northwest focus on supporting historically underserved communities, including the economically disadvantaged (\$716 million given in 2014), children (\$653 million in 2014), Alaska Natives and Native Americans (\$22.6 million in 2014), immigrants, migrants and refugees, and other communities of color.<sup>ii</sup> Alongside philanthropic investments, federal allocations informed by census data support these communities through vital programs.

Addressing the challenges for hard-to-count communities is a monumental undertaking even in the best of times. The addition of an untested citizenship question will make an accurate count even more complicated, costly and difficult.

On January 19, 2018, the Census Bureau's Chief Scientist and Associate Director for Research and Methodology, John M. Abowd, warned Commerce Secretary Wilbur Ross that adding a citizenship question "harms the quality of the census count." The January memo describes the impact: "reduced self-response," "increased item nonresponse," "erroneous enumerations increase," and "whole-person census imputations increase." The Bureau emphasized that the expected lower response rates and data quality problems "will be amplified during the 2020 Census compared to historical levels." Nonetheless, Secretary Ross instructed the Census Bureau on March 26 to add the citizenship question currently asked on the American Community Survey (ACS) to the 2020 Census.

The Census Bureau's own Scientific Advisory Committee (CSAC), a committee of appointed academics and other census experts, strongly disagreed with the decision to add the citizenship question. They noted that the Bureau normally tests a question thoroughly for many years before adding it to a survey, but in this case added the citizenship question with no testing or research. "We think the rationale offered by Sec. Ross in favor of adding the question relied on flawed logic," said the CSAC, adding that the question raises concerns about the completeness and accuracy of the 2020 Census, as well as the future of public trust in the Census Bureau.

Similarly, over the years, 10 former Census Bureau directors from both Republican and Democratic administrations have repeatedly noted that adding a citizenship question without necessary testing endangers the quality of all census data because it could discourage census participation among the tens of millions of households with non-citizen members; have unknown adverse consequences for other populations' participation; and possibly influence the accuracy of responses to other census questions, such as those collecting data on race and ethnicity.

Although the citizenship question is asked on the ACS, which is sent only to a sample of households, experts agree that it needs to be tested for the 2020 Census because the decennial census is a different collection operation, which goes to every household, and is in

a different political climate than when the question was tested for the ACS. The last, best chance to test the question in the context of the 2020 Census was the 2018 End-to-End Census Test. However, that test, well underway in Providence County, Rhode Island, does not include the citizenship question.

If anything, a new analysis of ACS data corroborates a broader analysis that the Census Bureau shared with Secretary Ross demonstrating a “decline in self-response for noncitizen households” and higher rates of Hispanics breaking off completion of questions such that “survey response quality is differentially affected.” The new analysis, which we are willing to share with the Census Bureau, shows that the citizenship question had the highest non-response rate of any 2016 ACS question that also will be on the 2020 Census questionnaire. Many of the hardest-to-count groups were the likeliest to leave that question unanswered.

The situation may have worsened since 2016. A Census Bureau memorandum from September 20, 2017 documented an “unprecedented” level of concern among focus groups about confidentiality in completing the census, noting that “fears, particularly among immigrant respondents, have increased markedly this year. . . . These findings are particularly troubling given that they impact hard-to count populations disproportionately, and have implications for data quality and nonresponse.” This conclusion alone—reached prior to the decision to add the citizenship question—warrants removal of any inquiry into citizenship status on the decennial questionnaire.

Estimates from the Census Bureau and external researchers show recent decennial censuses have resulted in net undercounts in communities of color—Blacks, Asians and Pacific Islanders, Middle Easterners and North Africans, American Indians and Alaska Natives, and Latinos—and among children under five years old. Many households in these communities do not trust government, and many may have family members who are fearful of responding to the 2020 Census. Adding the citizenship question in this climate of fear and distrust will have a disproportionate impact on hard-to-count communities. Being undercounted deprives children, families and whole communities of critical resources ranging from health care to education to public infrastructure.

Census undercounts also result in increased costs to the federal government. According to Census Bureau estimates from 2017 prior to adding the citizenship question, every one-percent decrease in the self-response rate increases the cost of the count by \$55 million. A conservative estimate of a five-percent drop in self-response from adding the citizenship question would add an additional, unplanned \$275 million cost to census operations, as the U.S. Constitution requires an actual count of every person.

Even before the citizenship question was added, there was concern among our foundation members about the difficulty of ensuring that those hardest to reach are counted in the 2020 Census. We had already been strongly concerned that funding constraints had impaired the Census Bureau’s preparation for this enumeration by leading, in particular, to

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the cancellation of key census tests that would have occurred in our region (a test of field operations in Colville tribal lands in Washington in 2017, and one of the other planned End-to-End test sites in Pierce County, Washington, in 2018). The addition of the citizenship question unnecessarily augments the challenge of ensuring an accurate count by increasing the hesitancy of our members' non-profit partners and trusted community leaders to encourage participation in the census.

For all the reasons stated above, we urge you to withdraw the citizenship question from the 2020 Census and instead focus on making sure everyone in the United States is counted once, only once, and in the right place.

Thank you for your attention to our comments. If you have any questions or need any further information, please contact Meredith Higashi at Philanthropy Northwest ([mhigashi@philanthropynw.org](mailto:mhigashi@philanthropynw.org)).

Sincerely,



Kiran Ahuja  
CEO  
Philanthropy Northwest

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<sup>i</sup> Philanthropy Northwest. (n.d.). Our members. Retrieved from Philanthropy Northwest Website: <https://philanthropynw.org/current-members>

<sup>ii</sup> Neroulias Gupte, N. (2017). *Trends in Northwest Giving 2017* (pp. 7). Retrieved from Philanthropy Northwest Website: <https://philanthropynw.org/sites/default/files/files/news/Trends%20in%20Northwest%20Giving%202017.pdf>