

August 7, 2018

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

Re: Docket No. USBC-2018-0005 (Comments submitted electronically via [regulations.gov](https://www.regulations.gov))

Dear Ms. Jessup:

Thank you for the opportunity to comment on the Census Bureau's proposed information collection activities for the 2020 Census. We, the 26 undersigned organizations, represent the scientific research community, which relies on data derived from the decennial census to advance scientific knowledge and produce valuable findings about the U.S. population that can be used to inform evidence-based policies. We are gravely concerned that the inclusion of a question on citizenship in the 2020 Census will increase the burden on respondents, add unnecessary costs to the operation, and negatively impact the accuracy and integrity of one of the most valuable data resources the government produces. We urge that the Department of Commerce remove the question from 2020 Census forms.

Many organizations have identified a number of potential negative impacts of this question—on representation and apportionment, on the allocation of over \$800 billion in federal funds to state and local programs, and on the private sector's ability to make informed business decisions, to name a few.

The concerns expressed in this letter, however, address the Census as a scientific enterprise: as an undertaking that is guided by science in its design and operation and as an invaluable source of data for researchers whose discoveries improve the lives of countless Americans.

The decision to add the citizenship question circumvented the extensive research and testing the Census Bureau routinely conducts in the years leading up to a decennial census and was made against the advice of experts at the Census Bureau, including Chief Scientist John M. Abowd, who wrote in a memo to Commerce Secretary Ross that adding such a question is "very costly" and "harms the quality of the census count."<sup>1</sup>

As a matter of course, the Bureau spends years before a decennial census carefully researching all proposed changes to the design and wording to ensure that they do not affect the quality of the responses received. In this case, agency experts were not given the opportunity to comprehensively evaluate the potential impact of the citizenship question. The evidence that does exist, however, suggests that the information collected is likely to be flawed and will harm the overall Census operation by deterring self-response. Research conducted by the Census Bureau indicates that a citizenship question would likely increase the number of households that do not respond to the Census at all—particularly in already hard-to-count immigrant communities.<sup>2</sup> This would increase the overall costs of the operation, as more enumerators would need be sent to collect responses in person, at far greater expense than planned mail or internet outreach. A decline in response from immigrant communities could result in an undercount of these populations, affecting the accuracy and integrity of Census data overall. In addition, evidence from the American Community Survey suggests that as many as 30 percent of non-citizens

incorrectly identify themselves as citizens when responding to the survey,<sup>3</sup> suggesting that the citizenship data collected at great expense during the 2020 Census could very well be inaccurate.

The costs of an inaccurate decennial Census to the scientific community—and the American public—are incredibly high. The decennial census is an irreplaceable source of data for researchers in varying fields who use it to produce evidence about the U.S. population that can be used to inform policies. In addition, information from the decennial census undergirds numerous other surveys and data sets at the Census Bureau and beyond, so a problem at the source would have far-reaching implications across the statistical system.

Given the high degree of risk and uncertainty and the likely poor quality of the citizenship information collected during the 2020 Census, the benefits of including a citizenship question on the 2020 Census do not outweigh the costs—both in terms of increased respondent burden and on the resulting Census data. In his memo to Secretary Ross, John Abowd noted that information on citizenship could be obtained for all but two percent of the U.S. population using administrative records.<sup>4</sup> Collecting citizenship information from every person to fill in missing information for only two percent of the population should meet any reasonable definition of “unnecessary burden.”

The Census is a once-a-decade undertaking; if we allow the integrity of the data to be jeopardized by an untested, unresearched citizenship question, we will be living with the harmful consequences for years. We have no way of knowing what future insights will be lost if this data is compromised.

For the reasons discussed above, we strongly oppose including citizenship in the 2020 Census data collection and urge the Department of Commerce to remove it. Thank you for your consideration. If we may be of any assistance or can provide additional information, please contact Julia Milton at [jmilton@coasa.org](mailto:jmilton@coasa.org).

Sincerely,

American Academy of Political and Social Science  
American Anthropological Association  
American Association for Public Opinion Research  
American Association of Geographers  
American Educational Research Association  
American Evaluation Association  
American Historical Association  
American Political Science Association  
American Psychological Association  
American Sociological Association  
American Statistical Association  
Association for Behavioral and Cognitive Therapies  
Association of Population Centers  
Association of Public Data Users (APDU)  
Association of Research Libraries  
Consortium of Social Science Associations  
Federation of Associations in Behavioral and Brain Sciences  
Institute for Social Science Research, University of Massachusetts, Amherst  
Knowledge Alliance

Midwest Political Science Association  
National Communication Association  
Population Association of America  
Social Science Research Council  
Society for Prevention Research  
Society for Research in Child Development  
Southern Political Science Association

---

<sup>1</sup> <http://www.osec.doc.gov/opog/FOIA/Documents/AR%20-%20FINAL%20FILED%20-%20ALL%20DOCS%20%5bCERTIFICATION-INDEX-DOCUMENTS%5d%206.8.18.pdf>, pg 1289

<sup>2</sup> <http://www.osec.doc.gov/opog/FOIA/Documents/AR%20-%20FINAL%20FILED%20-%20ALL%20DOCS%20%5bCERTIFICATION-INDEX-DOCUMENTS%5d%206.8.18.pdf>, pg 1293

<sup>3</sup> <http://www.osec.doc.gov/opog/FOIA/Documents/AR%20-%20FINAL%20FILED%20-%20ALL%20DOCS%20%5bCERTIFICATION-INDEX-DOCUMENTS%5d%206.8.18.pdf>, pg 1295

<sup>4</sup> <http://www.osec.doc.gov/opog/FOIA/Documents/AR%20-%20FINAL%20FILED%20-%20ALL%20DOCS%20%5bCERTIFICATION-INDEX-DOCUMENTS%5d%206.8.18.pdf>, pg 1324