

Population Association of America Association of Population Centers

Office of Government and Public Affairs

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July 23, 2018

Ms. Jennifer Jessup, Departmental Paperwork Clearance Officer,
Department of Commerce, Room 6616
14th and Constitution Avenue NW
Washington, DC 20230
(sent via internet at PRAcomments@doc.gov)

Dear Ms. Jessup,

On behalf of the over 3,000 scientists who are members of the Population Association of America (PAA) (www.populationassociation.org) and the over 40 federally supported population research centers at U.S. based research institutions comprising the Association of Population Centers (APC), we are writing in response to a recent Federal Register notice (83 FR 26643) regarding data collection activities related to the 2020 Census. In particular, we want to express our concerns regarding the notice's intention that a citizenship question will be included on the 2020 Census.

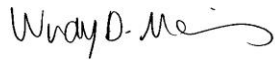
Population scientists include demographers, economists, and sociologists who conduct research on population trends and the individual, societal, and environmental implications of population change. They rely on the accurate and timely data from the federal statistical agencies to produce research findings and conduct research training activities. Decennial census data are the primary source of information population scientists rely on to monitor and analyze changes in the U.S. population. As a result, we share a profound commitment with other census stakeholders to ensuring full public participation in the decennial census. We are concerned that including an **untested** citizenship question on the 2020 Census will discourage participation in the decennial—especially among hard-to-count populations.

Since December 2017, when the Department of Justice (DoJ) sent the Department of Commerce a letter requesting the addition of a citizenship question, PAA and APC have signed and sent the Department of Commerce several letters urging the department reject the DoJ request. Our organizations believe that adding such an untested citizenship question will have numerous adverse fiscal, operational, and legal consequences. As scientists, we are especially concerned about the negative effect an untested citizenship question would have on response rates and the validity of the decennial data. Based on the experience of other surveys, population scientists have observed that responses to citizenship questions tend to be of low quality. Further, we have seen firsthand how adding questions to any survey inherently increases costs as well.

As proponents of responsible federal spending, our organizations are also alarmed by recent revelations regarding the potential adverse fiscal effect the citizenship question could have on the 2020 Census. According to research conducted by Census Bureau's Chief Scientist and Associate Director for Research and Methodology, Dr. John Abowd, adding the citizenship question will necessitate nonresponse follow up activity and, as a result, increase the decennial's costs by at least \$27.7 million.

We trust the Administration is weighing the harmful effects, including increased costs, suppressed response rates, and unreliable data, that the citizenship question could have this late in the decennial planning process—a process that is already facing tremendous challenges in its ramp up to Census 2020. Our organizations urge the Administration to consider concerns expressed by census stakeholders from the public, private, and non-profit sectors and to reverse its decision to include an untested, unnecessary citizenship question on the 2020 Census.

Sincerely,

A handwritten signature in black ink, appearing to read "Wendy D. Manning".

Wendy Manning, Ph.D., President
Population Association of America

A handwritten signature in black ink, appearing to read "Steve Ruggles".

Steve Ruggles, Ph.D., President
Association of Population Centers