



August 19, 2016

Honorable Shaun Donovan
Director
U.S. Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

Dear Director Donovan:

With the likelihood that Congress will not complete action on all appropriations bills before Fiscal Year (FY) 2017 starts on October 1st, we are writing to express our deep concern about funding for the **2020 Census** under a Continuing Resolution at a critical juncture in the planning and preparation cycle.

Our organizations participate in the Census Project (www.thecensusproject.org), a vast, diverse, and nonpartisan group of stakeholders who rely on accurate, timely, and comprehensive Census Bureau data for decision-making and resource allocation in virtually every facet of American society.¹ We cannot overstate the importance of census and ACS data to the work we all do.

We believe the Census Bureau's funding ramp-up *must continue uninterrupted* in order to carry out planned activities in FY2017 thoroughly and on schedule. Maintaining the agency's budget at FY2016 levels for a few months or, worse, into the second fiscal quarter, will force delays and cutbacks in vital tests, IT systems and operational development, and support activities such as updating the address list and developing an effective communications campaign, putting at great risk the Census Bureau's ability to conduct an accurate enumeration in 2020, especially in historically undercounted communities. Therefore, for the reasons set forth below, **we urge the Administration to request a funding anomaly for the Census Bureau in any FY2017 Continuing Resolution.**

First, we recognize that many federal programs must adjust their plans and schedules when faced with short-term flat funding and uncertain long-term funding under a Continuing Resolution. *The decennial census, however, is unique among federal responsibilities, both in purpose and structure.* Of primary importance, the Constitution requires a census every ten years as the foundation for our democratic system of

¹ Our coalition includes representatives from many sectors, including business and industry; state, local, and tribal governments; transportation; housing; education; labor; rural economic development; health care; civil rights; and nonprofit agencies helping low-income families and children, the elderly, people with disabilities, veterans, and immigrants and refugees.

governance. The census must be conducted on time and well, to advance equality of political representation under Article I and the Fourteenth Amendment. Accordingly, it is appropriate to assign a higher level of importance to the Census Bureau's short term funding needs.

Second, the census is the nation's largest, most complex peacetime mobilization, encompassing every community, household, and resident in the United States. The unique cyclical nature of the enumeration requires a steady progression from early research and testing, to planning and development, to preparation and implementation.

Activities in FY2017 will inform final design decisions that the Census Bureau must subsequently test in a census-like environment, with integrated operations and IT systems, in 2018. Key activities include:

- expanded work to verify and update the Master Address File and digital mapping system using new methods;
- launching the Local Update of Census Addresses (LUCA) program (required by Title 13, U.S.C.), to incorporate address and geographic information from states and localities;
- the 2017 Census Test, which will assess reengineered Update/Enumerate operations for the first time;
- the 2017 Puerto Rico Census Test, the first field test of operations in the Commonwealth;
- submission of 2020 Census and American Community Survey topics to Congress (required by Title 13, U.S.C.);
- final evaluation of 2015 National Content Test results and decisions on question wording, including revisions to the race and ethnicity questions;
- development of all IT systems in time for the 2018 End-to-End Test; and
- development of the Integrated Communications and Partnership program under a contract scheduled for award this month.

The Census Bureau cannot implement these activities in a comprehensive and timely way without a funding increase at the start of FY2017. Equally important, it cannot reclaim lost time and compensate for reduced scope of final tests and early preparations at this point in the cycle. Ironically, without timely, sufficient funding, the Census Bureau could abandon new, cost-saving methods as too risky or insufficiently vetted — decisions that could increase census costs by billions of dollars that Congress does not appear willing to appropriate. Yet, failure to establish full confidence in new methods and operations before deployment in the census, and to develop a flexible, targeted communications campaign, will jeopardize an accurate count and directly threaten efforts to reduce the persistent, disproportionate undercount of hard-to-enumerate population groups. Neither of these outcomes is prudent or acceptable.

Finally, the Census Bureau continues to identify insufficient funding as the greatest risk it faces in the short time remaining until the census. The Office of Management and Budget itself has recognized this threat. In its Statement of Administration Policy on the Senate FY2017 Commerce, Justice, and Science Appropriations bill, which cut the Administration's budget request for the Census Bureau by \$115 million, OMB warned that "inadequate funding of research, testing, and implementation activity for the 2020 Decennial Census would undermine the Census Bureau's efforts to reduce the costs of

administering [the census] by more than \$5 billion." Vital activities that will help ensure a high-quality census, such as development of language assistance materials and a reengineered coverage measurement program, already are behind schedule due to previous funding cutbacks and delays. *Clearly, the damage to census planning efforts will be far greater if the Census Bureau must proceed with no funding increase in the first fiscal quarter, or beyond.*

We believe the threat to a fair and accurate census that flat-funding under a Continuing Resolution poses is not a risk this nation and our democratic system of governance can afford to take. We urge you and the Administration to work with Congress to ensure that the Census Bureau receives the full level of funding it needs at the start of FY2017 to continue robust planning for a cost-effective, high-quality 2020 Census.

Sincerely,

American-Arab Anti-Discrimination Committee
American Educational Research Association
American Sociological Association
American Statistical Association
Asian Americans Advancing Justice|AAJC
Association of Population Centers
Association of Public Data Users
C2ER – The Council for Community and Economic Research
City of New York
Coalition on Human Needs
Consortium of Social Science Associations
Council of Professional Associations on Federal Statistics
Marketing Research Association
Minnesotans for the American Community Survey (MACS)
National Association of Counties
National Association of Home Builders
NALEO Educational Fund
National Association of REALTORS®
National Congress of American Indians
National League of Cities
National LGBTQ Task Force
National Low Income Housing Coalition
Nielsen
Population Association of America