

August 7, 2018

Jennifer Jessup  
Departmental Paperwork Clearance Officer  
Department of Commerce  
14th and Constitution Avenue N.W.  
Room 6616  
Washington, D.C. 20230

**Re: Proposed Information Collection; Comment Request; 2020 Census (USBC-2018-0005)**

Dear Ms. Jessup:

On behalf of the National Human Services Assembly (National Assembly), we write to offer comments on the 2020 Census proposed information collection. The National Assembly is a Washington, D.C.—based association comprised of some of the largest national nonprofit human service organizations. In aggregate, National Assembly members and their affiliates collectively touch, or are touched by, nearly every household in America—as consumers, donors or volunteers. Our mission is to strengthen human services in the United States through the active involvement and leadership of our members, envisioning a nation that seriously and effectively addresses the human service needs of its citizens.

A fair and accurate census count is essential for human service organizations. These data are vital in determining the allocation of more than \$800 billion in federal funding, apportioning political power at all levels of government, and informing the investment decisions of government, non-profit, and for-profit organizations. Low-income families and communities of color, among others, have been underrepresented in the decennial census for decades. Many of these groups will be at greater risk of undercount due to proposed changes in collection methods, including an increased reliance on the internet as the primary tool for households to submit their questionnaires. Additionally, many households may be reluctant to respond because of concerns about how the information about their citizenship status could be used. As a result, these communities will be deprived of vital public and private resources.<sup>1</sup>

**(A) Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility**

- i. Increased reliance on internet responses will depress the response rate for historically undercounted communities.*

Low-income families and communities of color are historically undercounted. Low-income families are much more likely to live in communities that are hard to count,<sup>2</sup> where residents making below 200% of the Federal Poverty Level account for nearly half the population. Likewise, low-income families typically rent instead of owning homes, making them more likely<sup>3</sup> to move during the census. Low-income

renters who allocate a larger proportion of their income toward rent are more likely to be evicted, and may not be counted in the census should they fail to update their addresses.

Because low-income households are disproportionately comprised of people of color, communities of color are more likely to be undercounted. According to the Census Bureau's (Bureau) 2012 post-enumeration survey,<sup>4</sup> the 2010 Census undercounted 2.1% of the black population and 1.5% of the Hispanic population while over-counting the non-Hispanic white population by 0.8%.

The 2020 Census will be the most technologically advanced<sup>5</sup> to date, and is the first to rely primarily on the internet for data collection. However, as the income of a family drops, so too does that household's likelihood<sup>6</sup> of having internet access. An increased reliance on internet responses will lead to an inaccurate count of families without internet access.

- ii. A citizenship question will further depress response rate because a significant number of U.S. citizens live in a household with at least one undocumented immigrant.*

The inclusion of a citizenship question would make it even more difficult to achieve an accurate count. Although the citizenship question was not included in the practice run of the census conducted in Providence, RI, the administration announced the addition just two days after the test survey was distributed, prompting many residents there to avoid participation.<sup>7</sup> Many families believe that Immigration and Customs Enforcement (ICE) would use their response to the citizenship question as a means to target household members who may be undocumented. According to the Bureau's own research, respondents from multilingual focus groups<sup>8</sup> expressed these same concerns.

Another undercounted demographic – immigrant families with young children – are especially at risk. It is estimated that 5.9 million<sup>9</sup> young children live in “mixed-status families” – families that include at least one undocumented immigrant. Fears over the possible deportation of parents or other family members will likely depress the response rate, leading to an undercount of young children, which will result in a loss of federal funding to states with large immigrant populations for essential programs and services.

- iii. An incomplete and inaccurate census will undermine the allocation of \$800 billion in federal funding.*

Approximately 300 federal programs use census-derived statistics for funding.<sup>10</sup> For example, the Federal Medical Assistance Program uses census-based per capita income variables to determine the percentage of matching payments the federal government will provide to each state.<sup>11</sup> If a depressed response rate among low-income households artificially increases the reported per capita income in certain states, those states will not receive their appropriate share of federal dollars. Insufficient federal funding will further burden state budgets and limit the availability and effectiveness of many programs. Programs at risk of underfunding due to an inaccurate census include, among others:<sup>12</sup>

- **Medicaid (\$312 billion):** Medicaid has helped with the medical costs for individuals with limited incomes. Federal funding is allotted based on the number of people counted in the census. More than two-fifths, or almost 37 million, of Medicaid enrollees are children. The federal government pays for at least 50% of the costs in every state.

- **Children’s Health Insurance Program (CHIP) (\$11 billion):** The federal government pays most of the costs of the program, and the federal share of the costs varies by state using an enhanced match based on the FMAP. CHIP covered 9.5 million children nationwide in FY 2017.
- **Supplemental Nutrition Assistance Program (SNAP) (\$69.5 billion):** SNAP is the largest program helping the low-income families and children undergoing food insecurities in the household.
- **Head Start (\$8.2 billion):** The Head Start program provides grants to local public and private nonprofit and for-profit agencies to provide child development services to economically disadvantaged children and families, to help children get a strong start in school. In 2014, 1.1 million children were served through all Head Start programs.
- **National School Lunch program (\$11.6 billion):** The program has helped provide low-cost or free lunches to low-income children in public or nonprofit school, approximately 30 million children benefitted from the program in 2015.
- **Child Care and Development Block Grant (CCDBG) (\$5.23 billion):** CCDBG helps low-income families who are working, participating in training or education programs, or looking for work afford child care and supports activities that improve the quality of care for all families. In fiscal year 2016, nearly 1.4 million children benefitted from CCDBG.

Undercounting low-income families, communities of color, and households with members of mixed immigration status will compromise the availability of essential resources that help all of us reach our full potential.

The National Assembly strongly opposes asking the untested and unnecessarily intrusive citizenship question in the 2020 Census. We also urge the Bureau to expand its community outreach efforts, and to thoroughly investigate and implement the best methods for obtaining census responses from hard to count populations and immigrant families.

Sincerely,



Lee Sherman  
 President & CEO  
 National Human Services Assembly

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<sup>1</sup> *Counting for Dollars: Why it Matters*, The Leadership Conference Education Fund, <http://civilrightsdocs.info/pdf/census/CountingForDollars-Intro.pdf> (last visited Aug. 6, 2018).

<sup>2</sup> *Mapping Hard to Count (HTC) Communities for a Fair and Accurate 2020 Census*, Hardest to Count (HTC) 2020, <https://www.censushardtocomcountmaps2020.us/> (last visited Aug. 6, 2018).

<sup>3</sup> *Will You Count? Renters in the 2020 Census*, The Leadership Conference Education Fund, <http://civilrightsdocs.info/pdf/census/2020/Renters-HTC.pdf> (last visited Aug. 6, 2018).

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<sup>4</sup> Press Release, U.S. Census Bureau, Census Bureau Releases Estimates of Undercount and Overcount in the 2010 Census (May 22, 2012), *available at* [https://www.census.gov/newsroom/releases/archives/2010\\_census/cb12-95.html](https://www.census.gov/newsroom/releases/archives/2010_census/cb12-95.html).

<sup>5</sup> Press Release, The Leadership Conference, New Report Highlights Opportunities and Risks for the First “High Tech” Census (Oct. 11, 2017), *available at* <https://civilrights.org/new-report-highlights-opportunities-risks-first-high-tech-census/>.

<sup>6</sup> U.S. Census Bureau, National Advisory Committee on Racial, Ethnic, and Other Populations, Administrative Records, Internet, and Hard to Count Population Working Group Final Report, [https://www2.census.gov/cac/nac/reports/2016-07-admin\\_internet\\_wg-report.pdf](https://www2.census.gov/cac/nac/reports/2016-07-admin_internet_wg-report.pdf) (last visited Aug. 6, 2018).

<sup>7</sup> Jon Kamp and Janet Adamy, *Citizenship Question Rankles in a Trial Run of 2020 Census*, WALL ST. J., April 13, 2018, *available at* <https://www.wsj.com/articles/census-citizenship-question-rankles-rhode-island-site-of-only-count-trial-run-1523620801>.

<sup>8</sup> Mikelyn Meyers and Patricia Goerman, U.S. Census Bureau, *Respondent Confidentiality Concerns in Multilingual Pretesting Studies and Possible Effects on Response Rates and Data Quality for the 2020 Census*, presentation at the 73rd annual conference of the Am. Assoc. for Pub. Op. Res. (AAPOR) (May 16-19, 2018) *available at* <https://www.census.gov/content/dam/Census/newsroom/press-kits/2018/aapor/aapor-presentation-confidentiality.pdf>.

<sup>9</sup> Silva Mathema, *Keeping Families Together*, CTR. FOR AM. PROGRESS, March 16, 2017, <https://www.americanprogress.org/issues/immigration/reports/2017/03/16/428335/keeping-families-together/>.

<sup>10</sup> Andrew Reamer, George Washington Univ. Institute of Public Policy, *Counting For Dollars 2020: The Role of the Decennial Census in the Geographic Distribution of Federal Funds*, Report # 2: Estimating Fiscal Costs of a Census Undercount to States (2018), <https://gwipp.gwu.edu/sites/g/files/zaxdzs2181/f/downloads/GWIPP%20Reamer%20Fiscal%20Impacts%20of%20Census%20Undercount%20on%20FMAP-based%20Programs%2003-19-18.pdf>.

<sup>11</sup> *Federal Medical Assistance Percentage (FMAP) for Medicaid and Multiplier*, Henry J. Kaiser Family Foundation, *available at* <https://www.kff.org/medicaid/state-indicator/federal-matching-rate-and-multiplier/?currentTimeframe=0&sortModel=%7B%22colId%22:%22Location%22,%22sort%22:%22asc%22%7D> (last visited Aug. 7, 2018).

<sup>12</sup> *See supra* note 3.