

August 7, 2018

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

RE: Comments on Proposed Information Collection on 2020 Census, Docket No. USBC-2018-0005

Dear Ms. Jessup,

On behalf of Alliance for Justice, we write to offer comments on the 2020 Census proposed information collection. We urge the Department of Commerce to remove the citizenship question from the 2020 Census form, as it will jeopardize the accuracy of the census in all communities – an outcome that the nation will have to live with for the next 10 years.

Alliance for Justice is a national association of more than 130 organizations dedicated to advancing justice and democracy. For nearly 40 years we have been leaders in the fight for a more equitable society on behalf of a broad constituency of environmental, consumer, civil and women's rights, children's, senior citizens' and other groups. Alliance for Justice is premised on the belief that all Americans have the right to secure justice in the courts and to have their voices heard when government makes decisions that affect their lives.

We believe a full, fair, and accurate census, and the collection of useful, objective data about our nation's people, housing, economy, and communities, is vitally important. Not only is a nationwide census required by the Constitution, it is integral to our democracy, ensuring that district lines and political power are fairly drawn and allocated. The federal government uses census-derived data to direct at least \$800 billion annually in federal assistance to states, localities, and families. The data also guide important community decisions affecting schools, housing, health care services, business investment, and much more.

Simply put, a fair and accurate census is essential for all basic functions of our society. *That is why the 2020 Census should not include a question on citizenship that the weight of scientific evidence indicates will undermine a successful count of our nation's people.*

Even before Secretary Ross' decision to place a citizenship question on the 2020 Census, state and local officials and community leaders were deeply concerned about the difficulty of achieving robust participation in many communities. In the current political environment, immigrants feel demonized, and their worst fears are realized when federal agents invade homes, schools, and places of worship and families are torn apart both at the U.S. border and in the heart of communities. Not surprisingly, the request has drawn intense opposition from a nonpartisan and ideologically broad group of business

leaders, state and local officials, social scientists, and civil and human rights advocates who know how much is at stake with a fair and accurate census. This groundswell of opposition has included more than 160 Republican and Democratic mayors, six former directors of the Census Bureau and two former Commerce Secretaries from Republican and Democratic administrations, civil and human rights groups, more than 600 faith leaders, more than 120 members of the U.S. House of Representatives, and many others representing a diversity of political ideologies and communities. **All are united in their deep-seated concern that an untested citizenship question will compromise implementation of the 2020 Census and jeopardize the quality and accuracy of census data for all communities.**

The harm from this decision (if it is not reversed) would be universal, with communities that are already at greater risk of being undercounted – including people of color, young children, and low-income rural and urban residents – suffering the most. An untested citizenship question will drive up costs as the Census Bureau struggles to develop new communications and outreach strategies with little time remaining, plan for an expanded field operation, and track down the millions of households that will be more reluctant to participate because of this controversial question. In sum, asking about citizenship status in a climate of fear and mistrust can only heighten suspicions, depress response rates, cost additional taxpayer money, and thwart an accurate, inclusive 2020 enumeration.

A full, fair, and accurate census is absolutely critical for our community. For the reasons discussed above, we strongly oppose asking about citizenship status in the 2020 Census and urge the Department of Commerce to remove the proposed citizenship question from the data collection forms.

Sincerely,
Alliance for Justice