

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  
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. I am providing comments based on my expertise as a former Associate Director for the 2000 Census, and as a former Director of the U.S. Census Bureau. My comments are directed at the inclusion of a question on citizenship on the 2020 Census questionnaire. This question should not be included on the 2020 Census questionnaire and should remain on the American community survey. My comments will focus on three supporting arguments: (1) the citizenship question has not been tested in a contemporary census environment, and thus introduces a serious risk of significant undercounts in the 2020 census; (2) alternative methods should be employed to collect this information that are more accurate than including a question on the 2020 Census questionnaire; and (3) inclusion of the citizenship question on the 2020 Census questionnaire will result in unacceptable increases in respondent burden. The rationale for these arguments are as follows:

1. The citizenship question has not been tested in a contemporary census environment, and thus introduces a serious risk of significant undercounts in the 2020 Census:

There is a great deal of evidence that even small changes in survey question order, wording, and instructions can have significant, and often unexpected, consequences for the rate, quality, and truthfulness of response. Given the critical importance of the 2020 Census a carefully designed multi-year research program should be conducted before introducing new questions to the questionnaire. No such testing program has been conducted, and furthermore, Census Bureau documentation clearly indicates very little is known about the effects of including a citizenship question on a number of surveys.<sup>1</sup>

The proposed citizenship question is included on the American Community Survey (ACS), however, the environment in which the ACS is conducted is not comparable to the environment that will occur for the 2020 Census. I am not aware of any research that can establish that the ACS environment is comparable to that of the 2020 Census. If any exists, the Census Bureau should make it available. The Census Bureau has produced research that indicates growing concerns that respondents have with privacy, confidentiality and

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<sup>1</sup> Ewert, Stephanie, *Citizenship and survey response rates*, Memorandum to Karen Humes, February 7, 2017

government surveys.<sup>2</sup> If the ACS is to be used to demonstrate that these concerns are not issues for the 2020 Census, the Census Bureau should make the weighted and unweighted monthly survey and item response rates available for the past two years for each question on the ACS. The data should be produced by Race and Hispanic Ethnicity, and at the lowest geographic level possible within production and confidentiality constraints.

Many experts on populations at risk of undercount, have advised that inclusion of the citizenship question on the 2020 Census questionnaire will result in significant undercounts to many population groups. As noted above, there is no research available to refute these claims, and therefore the inclusion of the citizenship question on the 2020 Census questionnaire poses a significant risk to the accuracy and representativeness of the 2020 Census.

2. Alternative methods should be employed to collect this information that are more accurate than including a question on the 2020 Census questionnaire:

Census Bureau leadership and Secretary Ross have stated on numerous occasions that a fairness and accuracy is one of the most important objectives for the 2020 Census. Inclusion of the citizenship question on the 2020 Census questionnaire is counter to achieving this goal. Census Bureau research has demonstrated that citizenship data for the 2020 Census can be more accurately produced from administrative records than by actually including a question on the 2020 Census questionnaire.<sup>3,4,5</sup> The research clearly demonstrates that the proposal to include the citizenship question on the 2020 Census suggested by Secretary Ross is significantly more biased and therefore much less accurate than the proposal made by the Census Bureau to produce these data from administrative records.

3. Inclusion of the citizenship question on the 2020 Census questionnaire will result in unacceptable increases in respondent burden:

Census Bureau research has shown that inclusion of the citizenship question on the 2020 Census questionnaire will at best provide data that cannot be obtained from administrative records for 2 percent of the respondents to the 2020 Census while needlessly burdening 98 percent of the United States population<sup>6</sup>. This same research has shown that the quality of

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<sup>2</sup> AAPOR Panel on *Changes in Respondent Privacy, Confidentiality, and Data Sharing Concerns*, Meyers, Goerman, Harris-Kojetin, Terry, and Fobia, Denver, Colorado, May 18, 2018

<sup>3</sup> Abowd, John *Technical Review of the Department of Justice Request to Add Citizenship Question to the 2020 Census*, Memorandum to Wilbur Ross, January 19, 2018.

<sup>4</sup> Census Bureau Document *Summary Analysis of the Key Differences Between Alternative C and Alternative D*, The complete administrative record upon which the Secretary of Commerce based his decision to reinstate a question concerning citizenship on the 2020 Decennial Census, pages 1316 – 1319.

<sup>5</sup> Abowd, John *Preliminary analysis of Alternative D (Combined Alternatives B and C)*, Memorandum to Wilbur Ross, March 1, 2018.

<sup>6</sup> Abowd, John *Preliminary analysis of Alternative D (Combined Alternatives B and C)*, Memorandum to Wilbur Ross, March 1, 2018.

the data obtained via inclusion of the citizenship question on the 2020 Census is likely to be inaccurate.

Equally as troubling, the proposed information collection does not include a definitive plan to publish the data that will be collected from the citizenship question. In fact the proposed information collection allows for the possibility that data collected from the citizenship question may not be published. It is unacceptable to place such a burden on the population of the United States without having a solid plan that describes how such information will be used. The Census Bureau should prepare and distribute a comprehensive plan for publishing citizenship data to support redistricting and enforcement of voting rights.

Thankyou for the opportunity to provide comments on this important Information Collection Request.

John H. Thompson, Former Director  
U.S. Census Bureau (August 2013 – June 2017)