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July 31, 2018

Ms. Jennifer Jessup

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

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

Dear Ms. Jessup:

Keystone Counts is a nonpartisan coalition of more than 35 statewide and local advocacy groups, service providers, and community organizations working together in Pennsylvania with grassroots organizations and policy, advocacy and legal partners to provide information and outreach effort across the commonwealth to ensure a fair and accurate 2020 census. Our members represent communities across Pennsylvania --- and all of them are concerned about the U.S. Commerce Department's decision to include a new and untested question about citizenship status in the 2020 U.S. Census. This question jeopardizes the accuracy of the count, which is why we urge Commerce to reconsider its decision and remove the citizenship question from the 2020 Census form to ensure a fair and accurate count.

Every 10 years, the U.S. Constitution requires a count of all people living in the United States, regardless of citizenship or legal status, to ensure fair political representation and funding for community needs. Republican and Democratic administrations alike, as well as Commerce Secretary Wilbur Ross, have confirmed this unequivocally. In fact, every census since the first enumeration in 1790 has included citizens and non-citizens alike, meaning this new question subverts time-tested and legal traditions.

The Census Bureau conducts careful, costly research and testing over a period of many years to develop the questions to be included in the census. Adding a new question on citizenship to the 2020 Census would disrupt preparations at a pivotal point in planning, increase census costs significantly, and jeopardize the accuracy of the 2020 Census by deterring many people from responding. According to the Census Bureau, every 1 percent decrease in the self-response rate will increase the cost of the count by \$55 million. A 5 percent drop in self-response would add an additional, unplanned \$275 million to the census effort. This is counter to the administration's effort to eliminate wasteful spending.

Experts agree that the unwise addition of this citizenship question will cause participation in the upcoming census to plummet, so much so that there was bipartisan opposition to adding in this unnecessarily intrusive and untested question essentially at the last minute. Experts are unsure how

households --- whether native or foreign-born, citizen or noncitizen --- will respond to a question asking about confidential personal information because of their concerns about how government authorities may use that information. And that concerns us at Keystone Counts.

Anything that disrupts the collection of useful, objective data about people, housing, our state and national economies, and the communities where our residents live jeopardizes a fair and accurate census. If that happens, then make no mistake about it: Pennsylvania communities and others across the country will lose out on billions in federal aid because of undercounting as a result of this question.

There are 16 large Census-guided programs that distribute \$589.7 billion in federal fund each year. They include program areas such as Medicaid, Supplemental Nutrition Assistance Program (SNAP), highway planning and construction, the Low Income Home Energy Assistance Program (LIHEAP), Section 8 Housing Choice Vouchers, Head Start/Early Start, and more. Pennsylvania currently receives more than \$26 billion annually through census-backed programs, meaning an undercount could cost our state hundreds of millions of dollars. If government is concerned about the most efficient and effective use of taxpayer money, then making sure the count is accurate is critical in ensuring the fair distribution of money from these Census-guided programs.

An accurate count also is needed to apportion seats fairly among all the states for representation in the U.S. House of Representatives. If large numbers of Pennsylvania residents are uncounted, that could affect the state's federal representation. Pennsylvania could easily lose one or more representatives in the U.S. House of Representatives based on the 2020 census, especially if the count misses key communities like kids, people of color, immigrants, and others who have been historically undercounted. But it doesn't stop there. The census also will have a direct impact on state House and Senate districts in the commonwealth. The repercussions are enormous then not only for the fair distribution of taxpayer funds but also for fair representation at almost every level of government.

The 2020 U.S. Census is already facing new complications, and that's without the inclusion of a citizenship question. Poor Internet access is an issue in many rural areas throughout the country, including in Pennsylvania. There are 803,645 people in Pennsylvania who do not meet the Federal Communications Commission's minimum threshold of having broadband internet access --- that's 6 percent of our population. The lack of Internet access coupled with a citizenship question would destroy the possibility of an accurate count in the commonwealth.

The census helps us understand Pennsylvania's communities more clearly: not only where people live, but also what languages they speak, how much education they have completed, income levels, family makeup, racial identity, and so much more. Community leaders rely on census data to make decisions about allocating resources in Pennsylvania for education, health care, housing, veterans, seniors, and much more. Without accurate data, leaders will miss important community needs.

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. Because of the clear impact this citizenship question will have on outcomes, we urge Commerce, for the good of our state and nation, to reconsider its decision and remove the question from the 2020 Census form. The harm extends beyond Pennsylvania, and the outcome is one our country will have to live with for the next 10 years. We hope you will consider our request. Thank you.

SINCERELY,

Erin Casey, Executive Director
Keystone Counts