



August 2, 2018

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

Submitted via <http://www.regulations.gov> (Docket # USBC-2018-0005)

RE: Comments on Proposed Information Collection on 2020 Census

On behalf of the League of Women Voters of the United States, 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 following 10 years.

Simply put, a fair and accurate census is essential for all basic functions of our society. That is why including a citizenship question on the 2020 Census, when the weight of scientific evidence indicates the question will undermine a successful count of our nation's people, is a grave mistake.

We believe in a full, fair and accurate census. The collection of useful, objective data about our nation's demographics, 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 are fairly drawn, and appropriate resources are 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 guides important community decisions affecting schools, housing, health care services, business investment and much more. A Census undercount or miscount will compromise the lives of millions of people and will cost more money to rectify in the long run.

The League believes including a citizenship question in the 2020 Census will cause participation to plummet and threaten the accuracy of the Census. Census data is not only used to draw state and congressional districts based on population, but it is also used by local governments to plan for public safety and make investments in the future of their communities. An undercount of persons in any given area could result in inadequate disaster responders, insufficient resources for transportation and education and will impact the overall health and safety of communities. An accurate Census is critical to all American communities. An accurate count is too important to risk the negative results with this political move.

The last time the Census included a question about citizenship was in 1950, well before the passage of the 1965 Voting Rights Act (VRA). There is no justification to the Department of Justice's claims that adding a citizenship question is necessary to enforce the VRA.

The harm from this decision would be irreversible. Communities that are already at greater risk of being undercounted – people of color, young children, and low-income rural and urban residents – will suffer the most. Including a citizenship question on the Census will undermine participation and threatens the overall Census process that is vital to our democracy.

A full, fair and accurate census is critical for our communities.

The League of Women Voters strongly opposes asking about citizenship status in the 2020 Census and we urge the Department of Commerce to remove the proposed citizenship question from the data collection forms.

The Census Bureau has a statutory obligation under the Paperwork Reduction Act to minimize the burden of information collection on the public. The clear standards for including topics and questions in the census, described in numerous bureau documents, have not been met and there is evidence to suggest intentional circumvention of those standards. Therefore, the proposed citizenship status question does not have practical utility and should be removed from the 2020 Census questionnaire.

The Census Bureau should remove the citizenship question from the 2020 Census form and consult further with the Secretary of Commerce and with career professionals in the Justice Department about ways to produce data that clearly and demonstrably meet the bureau's own standards, as well as broader federal standards and guidelines, for collecting data from the American public in federal surveys and censuses.

On behalf of our more than 750 state and local affiliates and our 300,000 members and supporters across the country we respectfully submit these comments. Thank you for the opportunity to comment on the questions to be asked in the 2020 Census. If you have any questions about these comments, please contact Celina Stewart, Director of Advocacy and Litigation, at 202-843-0433 or cstewart@lww.org.

The League of Women Voters of the United States
1730 M Street, N.W.
Washington, DC 20036
202-429-1965
www.lww.org