



August 6, 2020

Steven Dillingham
Director, US Census Bureau
U.S. Census Bureau
4600 Silver Hill Road
Washington, DC 20233

Dear Director Dillingham,

The League of Women Voters of the United States and Common Cause write to urge the Census Bureau to continue to adhere to the mission of the decennial census — to count everyone residing in the United States once, only once, and in the right place. In the face of political & partisan jockeying, the Census must ensure that all people who call America home have an equal opportunity to be counted in the 2020 Census.

The Census is the bedrock of our democracy, and we cannot afford to politicize the count. For the last 3 years, multiple partisan attempts have been made to undermine a complete and accurate census count -- most notably, the unsuccessful ploy to add a citizenship question that was blocked by the U.S. Supreme Court. This was followed by the [executive order](#) to collect block-level citizenship data from administrative sources, the decision to create two new senior positions at the Census Bureau and fill them with political operatives, and most recently the President's July 21st [memorandum](#) to the Department of Commerce to exclude undocumented immigrants from reapportionment and a sudden about-faced move to shorten the period for enumeration. Each of these maneuvers were designed to exclude populations from the Census. We urge the Census Bureau to uphold its constitutional and legal mandate to count all persons living in the U.S., and to resist efforts to manipulate the Census for partisan and racial advantage.

The Administration's actions take us down a dangerous, but familiar path. The three-fifths compromise was into the U.S. Constitution to mandate that slaves, also not then considered citizens, be counted, but only as three-fifths of a human being for the sole reason of it being politically advantageous. Over 200 years later, this Administration proposes to turn back the clock on our country's civil rights movement, and erase the right to fair representation for partisan and racial advantage in congressional apportionment.

[Common Cause](#) is a nonpartisan organization that works to serve its 1.2 million members to ensure that every voice counts, and that our government is of, by, and for the people. Common Cause's expertise on census issues is enhanced by our state staff that serve on Statewide Complete Count Committees in six states, including Colorado, Maryland, Massachusetts, Minnesota, Pennsylvania, and Rhode Island, as well as local complete count committees throughout the country.

[League of Women Voters of the United States](#) is a nonpartisan organization that was founded nearly 100 years ago in 1920 by women who understood the importance of securing voting rights for women. With its 764 local affiliates in every congressional district in the country, the League has worked in coalition to share information on how everyone can get counted, worked in Complete Count Committees to share out information about low-reporting areas, and communicated where additional support is needed.

Mr. Dillingham, you must protect the integrity of the census. Under your watch the Census Bureau is turning into a tool for hyper-partisan activity and the stakes are too high here. If communities continue to fear filling out their census form, children experiencing poverty go hungry, neighborhoods will lack the necessary equipment to aid in COVID-19 recovery, and millions of voices will be erased and prevented from using one of the only tools they have to stand up to power and money.

Common Cause and the League of Women Voters of the United States urge you to do the following to save the census:

Pursue counting people until October 31, 2020: To date, the national self-response rate is the lowest in history. The final phase of the Census, non-response follow-up where census takers collect responses in-person is more critical than ever before. The Bureau rightly extended its enumeration activities to October 31, to account for the months of shuttered activities during March, April, and May due to the pandemic.

It has recently been reported that the Census Bureau plans to cut the non-response follow-up operation to September 30, instead of the previously reported October 31st deadline. We cannot rush 2020 Census operations, because the most difficult work lies ahead. We understand that with Congress not committing to extending statutory deadlines, this request is difficult, however, we implore you to explore every option to make this possible. As you know, if the Census Bureau doesn't have the time it needs for a thorough enumeration of households that didn't respond on their own, people experiencing homelessness, and people who live in transitory locations such as RV parks, the historic undercount of harder-to-reach populations — including rural communities, low-income households, people of color, American Indians living on tribal lands, immigrants, and young children — will get worse. Even with the near completion of the Update Leave Operation, places like Minnesota that boast the nation's highest self-response rate, has census tracts response rates as low as 22.8%.

Ensure Census Bureau funds are only being used to compile critical data products: The Census Bureau has limited time and money to complete critical statutory and constitutionally mandated operations. It is imperative that Census Bureau funds are only being used to compile critical data products. As you know, on July 11, 2019, President Trump issued Executive Order 13880, which required the Census Bureau to utilize resources and staff capacity to collect administrative data from various federal agencies on citizenship status in order to identify non-citizens residing in the United States for the purpose of gerrymandering and to potentially exclude non-citizens and citizens under 18 from district lines in states. Now that the country is seeing a second wave of COVID 19, potentially further hampering Census efforts to count every person, the Census Bureau must use its limited funds to conduct its constitutionally mandated processes. The Bureau should not be expending any additional resources on an unconstitutional effort to access administrative records in order to exclude a population of people from the Census based on immigration status.

Protect the public with a proactive COVID-19 plan: The Census Bureau must do more to protect the public during in-person enumeration. Gloves, hand sanitizer, mask usage, and other relevant PPE are first steps, but more public health protections are needed. The Bureau must, in consultation with public health experts, consider additional ways to mitigate risk — including testing and temperature checks for all staff, air filtration in

census offices, and providing respondents with masks. We urge the Bureau to work in coordination with public health experts to conduct a safety audit of current and planned operations to explore and implement additional measures to ensure the safest 2020 Census possible. Many of the communities hit hardest by the pandemic are the same ones the Census has missed for decades. Without proactive COVID-19 protections for the 2020 Census, people across the country will be denied funding, resources, and representation.

Increase advertising in immigrant communities: The Census Bureau should continue to make adjustments to the Integrated Communications Campaign. In the past our organizations have advocated for extending the advertising period through the non-response follow-up period in targeted communities with large populations left to count. We've also called for additional advertising in new languages including Haitian Creole and African, Asian, Native Hawaiian and Pacific Islander, and Native American languages in ways that would best reach each community.

In the spirit of reaching all communities and counting all people in this country, the constitutionally required task of the Census, additional advertising should be devoted to ensuring that everyone fills out the form despite their citizenship status. The July 21, 2020 executive memorandum from the White House sends a message that runs counter to the Census' constitutional mandate of counting everyone. To counter this fear and misinformation, the Census Bureau must put advertising dollars behind the message that everyone counts in this country, despite their language, citizenship status, nationality, or any other factor. Any threat to the census count is a threat to communities who rely on the data to support and enfranchise those that live there with the necessary services to make communities safe, healthy, and protected.

In conjunction with messaging supporting every person being counted, the Bureau should incorporate messaging about confidentiality into its earned and paid media strategy. People must know that the Census Bureau will not share data with landlords, law enforcement, or public benefit providers to ensure that everyone feels safe answering the 10-question form.

Increase transparency & provide stakeholders with Non-Response Follow-Up (NRFU) completion rates: In order to continue strong partnerships with stakeholders across the country, the Census must continue to provide data that will support outreach campaigns. The Census Bureau should increase the transparency of its operations and provide the necessary data to stakeholders to support effective outreach strategies and maintain momentum for "get out the count" efforts.

- Data on self-response should be released every weekday and NRFU completion rates released once a week through the full household enumeration period. Separate self-response data on the mode households use to respond — phone, paper, or online — would help ensure that stakeholders are able to adapt messages and outreach to specific communities effectively.
- Data on staff recruitment, hiring, and on-boarding (including applicant pool, applicants that have left the applicant pool, offers made, staff fingerprinted, and staff trained) that help stakeholders support Census Bureau recruitment efforts. With the additional time that the Census Bureau has to recruit and hire staff for the NRFU operation, the Census Bureau should share specific data on targeted efforts to recruit and hire staff with cultural competency and language skills.

- Data on the group quarters that have responded will help state and local governments and associations support e-Response and reduce the need for in-person Group Quarters enumeration.
- Additional detail on media buys by week, language, and geographic reach.
- Call center metrics (abandonment rate, wait times, number of callback requests, time for callbacks, etc.) by language, so stakeholders can advise residents on how to best get through.
- Call center “daily top reasons for calling,” so GOTC groups and local 311 and 211 centers can help preemptively answer common questions and reduce call volume to census phone lines.

This data and its release, which is also supported by our other partner organizations will ensure that the League of Women Voters of the United States, Common Cause, and others can continue to be good partners for the Census and support the counting of all people living in America.

Send a paper questionnaire to non-responding households: The Census Bureau must send at least one additional census mailing during the extended self-response period from as NRFU is extended through the fall of 2020. Given the lack of a computer or internet access in hundreds of thousands of households, the delayed in-person follow-up, and the confusion about the census timelines, Common Cause and the League of Women Voters of the United States strongly supports the Census Bureau’s recent decision to deliver a paper questionnaire to non-responsive households. Households need a reminder so that they can still respond on their own through October 31, 2020). All mailings should remind households that “It’s not too late! The census is still going on!” and include in-language messaging that lets people know they can respond in that language online or by telephone.

The League of Women Voters of the United States and Common Cause have a strong interest in providing the Census Bureau with the time and resources it needs to conduct a full and accurate count of every person living in the United States. We urge the Census Bureau to continue to enforce its mission in the midst of partisan political power grabs to count everyone who calls America home, once, only once and in the right place.

If you have questions about the recommendations in this letter please contact Jessica Jones Capparell at the League of Women Voters of the United states, jjones@lwv.org or Keshia Morris Desir at Common Cause, kmorris@commoncause.org. We look forward to continuing our work together to ensure a full and accurate 2020 Census.

Sincerely,

Karen Hobert Flynn
President
Common Cause

Virginia Kase
Chief Executive Officer
League of Women Voters of the United States