



August 7, 2018

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

**RE: Proposed Information Collection; Comment Request; 2020 Census. Federal Register Vol. 83, No. 111 / Friday, June 8, 2018, pp. 26643-26653.**

The Department of Finance is responding to the June 8, 2018 Federal Register Notice requesting comments on the 2020 Census Proposed Information Collection.

California is committed to ensuring full public participation in the 2020 Census given that a complete and accurate count is critical for fair political representation and the distribution of billions of dollars in federal funds. To that end, we strongly recommend the U.S. Census Bureau withdraw the citizenship question, increase field canvassing efforts, expand language options for the Census form and broaden efforts to reach residents who do not initially respond.

One of the most significant changes to the 2020 Census questionnaire is the addition of the citizenship question, which will compromise the accuracy and quality of the national response. Although the Census Bureau has not conducted sufficient research and testing of the citizenship question in the Census environment, as is typically done for such changes, the Census Bureau has evidence from the American Community Survey (ACS) that including the citizenship question suppresses response. Adding this question will discourage immigrants, both citizens and noncitizens, from participating and will result in an inaccurate count as well as reduced representation and allocation of resources for states with large numbers of immigrants. Furthermore, the inclusion of this question will increase the cost of conducting the Census by reducing overall response and requiring additional resources for follow up.

In order for the Census Bureau to achieve its goal of counting everyone “once, only once, and in the right place,” it needs a complete address list for all residents. In 2010, Census Bureau field staff canvassed nearly every block in the nation. This comprehensive approach for validating the address list has been abandoned for the 2020 Census and replaced with a new, in-office validation strategy using satellite imagery and third-party data. This type of off-site canvassing has the grave potential to miss unconventional and secondary housing units that share a roofline, such as garages and basement conversions, and do not appear on satellite imagery. People residing in these housing units may not be counted, which is unacceptable. While the Census has agreed to do in-field canvassing in areas where addresses cannot be verified (approximately 30 percent of total addresses), this is inadequate to ensure that every person has an opportunity to participate.

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The 2020 Census also proposes to severely reduce accessibility for non-English speakers by printing forms in English and Spanish only – a departure from the six languages included in 2010 – and limiting the language assistance provided for online and telephone questionnaires. This will adversely affect the Census Bureau’s ability to meet its goal of counting all residents. Approximately 6 million California residents do not speak English or Spanish at home and may need language assistance to complete the Census questionnaire. The Census Bureau should offer the paper census form in at least six languages, focusing on populations that are limited English proficient, representing approximately 26 million individuals in the United States. Translation and interpretation services for both online and telephone should be expanded from 12 to include languages spoken by at least an additional 14 groups. This would cover groups of more than 50,000 in the U.S. who speak English “less than well,” and add notable languages such as Gujarati, Hmong, and Laotian.

The Census Bureau has also proposed changes to its nonresponse follow up (NRFU) operation to incorporate the use of administrative records (which include sources such as tax records or Medicare enrollees). Administrative records should not be the only means used to determine whether households that do not respond are vacant or non-existent, and these households should all receive in-person follow-up.

Overall follow-up is also diminished for the upcoming Census compared to 2010. Rather than conducting up to six in-person visits to households that do not initially respond, the Census Bureau proposes to attempt just one, in-person visit and then use administrative records as the household’s response. This will lower direct participation and force the Census Bureau to rely instead on administrative records, which are unreliable. Data quality in administrative records can vary dramatically and show multiple people associated with a single address, or a single person associated with more than one address. The Census Bureau lacks sufficient evidence to show that the administrative records it obtains would adequately replace such a large number of incomplete responses. Administrative data cannot replace a project of this size and significance. Therefore, we advise the Census Bureau to conduct at least three in-person visit attempts before utilizing administrative records to fill out the census form.

Finally, in light of its obligations under Title 13, the Census Bureau should provide details on how it will proactively and diligently reassure all residents of the United States that the data and personal information collected will not be used by anyone outside of the Census Bureau, including other federal agencies, for a period of 72 years. The Census Bureau should also publicly release its agreements with federal law enforcement agencies demonstrating the government’s full commitment to protect privacy and the integrity of Census 2020.

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We appreciate this opportunity to comment on the 2020 Census Proposed Information Collection and hope you will consider our recommendations to help make the 2020 Census count the most accurate possible.

Sincerely,



Irena Asmundson  
Chief Economist

cc: Honorable Xavier Becerra, California Attorney General  
Honorable Alex Padilla, California Secretary of State  
Mr. Daniel Torres, Chair, California Complete Count Committee  
Ms. Ditas Katague, California Census Coordinator