



May 30, 2017

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

Submitted via e-mail: PRAComments@doc.gov

**Re: Proposed Information Collection; Comment Request; 2018 End-to-End
Census Test – Peak Operations**

Dear Ms. Jessup:

On behalf of the Center for American Progress (CAP), we are writing this letter in response to the Notice published in the Federal Register on March 9, 2017, which seeks comment regarding the 2018 End-to-End Census Test – Peak Operations as proposed by U.S. Census Bureau.

CAP is a nonpartisan think tank dedicated to improving the lives of Americans through bold, progressive ideas and action. As part of its core mission, CAP conducts research and develops progressive policy ideas to expand opportunity for the more than 300 million Americans, strengthening local communities, and in turn, building a better America that works for everyone and not just the wealthy few.

The decennial census plays a critical role in the work we do here at CAP. It forms the basis of innovative policy development and helps researchers both identify problems and measure progress on a number of issues ranging from immigration to poverty and economic security, among others.

The upcoming 2020 Census count is at risk. Funding constraints, technologization, and political turmoil have created uncertainty around the quality and accuracy of the 2020 Census. In response to these major setbacks, the Bureau has taken serious steps towards reducing costs and digitizing the way censuses and surveys are managed and collected. The 2018 End-to-End Census Test is a critical step in finalizing these changes and ensuring quality, accurate data for the 2020 Census. For this reason, we are submitting

public comment in support of the proposed collection of information and ways to enhance the quality, utility, and clarity of the information to be collected.

With the Administration's most recently proposed funding cuts, a great deal is at stake for the 2020 Census. Quality assurance is key to ensuring that we stay true to American democracy.

The Notice invited comments on “whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility.” **We strongly support the proposed collection of information, and believe it is necessary and bares practical utility across areas of political and economic concern.**

The proposed collection of information in the 2018 End-to-End Census Test rises to the level of necessary and practical import as its successful execution will ensure a robust decennial census with utmost accuracy. Indeed, the decennial census is a cornerstone of this nation's democracy and government. As such, our Founding Fathers mandated it in the U.S. Constitution.ⁱ It provides the basis for ensuring fair representation in government; it guides the allocation of federal funds for some of the nation's most important economic programs; it allows state and local officials to make informed policy decisions that will impact their constituents and their budgets; and it helps spur economic development by ensuring that businesses are equipped with high-quality, accurate data to inform decisions related to planning, development, and marketing.

Ensuring fair representation in democracy and government

The decennial census is fundamental to American democracy. With its legal basis rooted in Article I, Section 2 of the U.S. Constitution and later superseded by the 14th Amendment,ⁱⁱ the census determines how seats in the U.S. House of Representatives are apportioned among the states, and by extension, the number of Electoral College votes.ⁱⁱⁱ Thus, the decennial census has significant implications for democracy, government and fair representation.

A census' quality assurance is key to ensuring fair representation. As economist and research scientist Jay Zagorsky simply put it, "a census done quickly and on the cheap end will tend to count easy-to-find people at the expense of those in the cracks."^{iv} And those in the cracks are traditionally undercounted groups—such as people experiencing homelessness, low-income families, LGBTQ individuals, immigrants, and non-English speakers—who live in hard-to-count circumstances.^v Ethnic and racial minorities are, too, among those undercounted. African Americans and Latinos, for example, were undercounted by about 2 percent in the 2010 Census.^{vi} As a result, these groups tend to be underrepresented in democracy and government. Underrepresentation can translate to bad policy, such that laws and policies are then crafted without the same regard for communities that are marginalized.

Helping families meet basic living standards

The accuracy of the decennial census has large implications for essential public assistance programs, and by extension, the families these programs serve. In fact, its accuracy determines the geographic distribution of a substantial portion of federal assistance. For example, a 2010 report by the Brookings Institution found that census-related data guided the distribution of \$446.7 billion in federal assistance in FY2008, or 31 percent of all federal assistance.^{vii} Moreover, data from the Census 2000 guided some \$419.8 billion in federal grants, accounting for 75 percent of all federal grant funding.

Federal agencies use these data to inform the design, implementation, rules and evaluation of federal assistance programs.^{viii} Further, policy researchers at-large, such as those at CAP, use these data to identify problems, develop reforms, and measure progress across virtually every policy domain—including transportation, poverty, and infrastructure. Without these data policymakers lack the proper tools to craft evidence-based and impactful laws, thereby hindering their ability to ensure efficient and effective government.

In fact, census-guided funding is highly concentrated in a small number of federal assistance programs. Medicaid comprised 58 percent of all census-guided funding in FY2008, a figure that has likely expanded in the wake of the Affordable Care Act. Other programs relying on these data for implementation include the Supplemental Nutrition Assistance Program (SNAP), Medicare, Section 8 Housing Choice Vouchers, and the National School Lunch Program, among others.^{ix}

The accuracy of the 2020 Census can help increase the flow of federal funds to those families that need public assistance and benefits. It helps federal agencies improve the design of such programs, so that these families can meet basic living standards, such as health care, housing or just bringing food to the kitchen table. It helps researchers build upon this nation’s policy framework. And it’s hard-to-count populations—including young children^x—that particularly benefit from such accuracy and robustness, thereby ensuring access to essential benefits that expand opportunity and increase one’s life chances.

Spurring business development and economic growth

The link between business development and the decennial census is undeniably important to local and regional economic growth. Across all types and sizes, firms use these data to inform business decisions, such as identifying markets, selecting business locations, making investment decisions, purchasing equipment, developing new products, determining goods and services to be offered, and assessing labor markets.^{xi} Moreover, these data help states and local governments, chambers of commerce, and public-private partnerships develop strategies for attracting new companies to local commerce and promote business expansions and startups that eventually boost job growth and the tax base.^{xii}

Quality assurance in the census can greatly affect business development, particularly among small towns and other less populated areas. An inaccurate count in an already less densely populated area can impact a company’s decision to invest there, pulling away the economic benefits that come with business development.^{xiii}

The Notice invited comments on “ways to enhance the quality, utility, and clarity of the information to be collected.” While the final determination has not been made on the format of race/ethnicity questions for the 2020 Census, **we commend the Bureau for utilizing the combined race/ethnicity question version in the 2018 End-to-End Census Test to further its analysis and understanding of responses.**

As noted in previous comments submitted to the Office of Management and Budget by CAP, the disaggregation of data by race and ethnicity can expose stark trends across a variety of policy areas, such as health, criminal justice, education, poverty, and violence.

For example, when education data on Asian American and Pacific Islanders (AAPI) are disaggregated, one can identify large disparities among the racial and ethnic subsets. About 73 percent of Taiwanese Americans hold a Bachelor's degree, while only 12 percent of Laotian Americans do. Similarly, when examining disaggregated AAPI data on poverty, 49 percent of Marshallese Americans live below the poverty line, while only 5 percent of Fijian Americans do.^{xiv}

The current lack of mandated data disaggregation for such populations harms racial and ethnic minorities as the misrepresentation of data can act as a barrier to policy innovations that would otherwise address underlying disparities. CAP continues to support enhancements to the content of the proposed collection of information, including supporting a combined race/ethnicity question format as that to be used in the 2018 End-to-End Census Test.

Quality data collection in the census is essential to meeting the needs for some of this nation's most marginalized communities, such as racial and ethnic minorities, LGBTQ individuals, aging seniors, young children, and people with disabilities. It has helped shape policy to address disparities in poverty, economic security, healthcare, and social injustices, among other socioeconomic challenges. The proposed operation for the 2018 End-to-End Census Test will be instrumental to ensuring that we stay true to American democracy.

Sincerely,

Danyelle Solomon
Director, Progress 2050

Katherine Gallagher Robbins, PhD
Director of Family Policy, Poverty to Prosperity Program

Laura E. Durso, PhD
Vice President, LGBT Research and Communications Project

ⁱ National Archives and Record Administration, *U.S. Constitution*, available at <https://www.archives.gov/founding-docs/constitution-transcript>.

ⁱⁱ National Archives and Record Administration, *U.S. Constitution, Article I and the 14th Amendment*, available at <https://www.archives.gov/founding-docs/constitution-transcript>.

-
- ⁱⁱⁱ National Archives and Record Administration, *U.S. Electoral College*, available at <https://www.archives.gov/federal-register/electoral-college/>.
- ^{iv} Jay Zagorsky, “The Fight Over the 2020 Census Could Determine Which Party Controls Congress,” *The Fiscal Times*, May 12 2017, available at <http://www.thefiscaltimes.com/2017/05/12/Fight-Over-2020-Census-Could-Determine-Which-Party-Controls-Congress>.
- ^v Tara Bahrapour, “Census watchers warn of a crisis if funding for 2020 count is not increased” *The Washington Post*, April 18, 2017, available at https://www.washingtonpost.com/local/social-issues/census-watchers-warn-of-crisis-if-funding-for-2020-count-is-not-increased/2017/04/17/e6cc170a-20d6-11e7-a0a7-8b2a45e3dc84_story.html?utm_term=.40dfdb091183.
- ^{vi} Bureau of the Census, “Census Bureau Releases Estimates of Undercount and Overcount in the 2010 Census” (US Department of Commerce) May 22, 2012, available at https://www.census.gov/newsroom/releases/archives/2010_census/cb12-95.html.
- ^{vii} Andrew Reamer, “Counting for Dollars: The Role of the Decennial Census in the Geographic Distribution of Federal Funds,” (Washington: Brookings Institute, 2010) available at https://www.brookings.edu/wp-content/uploads/2016/06/0309_census_report.pdf.
- ^{viii} Benjamin Chevat and Terri Ann Lowenthal, “Meeting the Challenges of the 2020 Census,” (Washington: Center for American Progress, 2015) available at <https://cdn.americanprogress.org/wp-content/uploads/2015/02/ChevatCensus-report5.pdf>.
- ^{ix} Andrew Reamer, “Counting for Dollars: The Role of the Decennial Census in the Geographic Distribution of Federal Funds,” (Washington: Brookings Institute, 2010) available at https://www.brookings.edu/wp-content/uploads/2016/06/0309_census_report.pdf.
- ^x Tara Bahrapour, “Census watchers warn of a crisis if funding for 2020 count is not increased” *The Washington Post*, April 18, 2017, available at https://www.washingtonpost.com/local/social-issues/census-watchers-warn-of-crisis-if-funding-for-2020-count-is-not-increased/2017/04/17/e6cc170a-20d6-11e7-a0a7-8b2a45e3dc84_story.html?utm_term=.40dfdb091183.
- ^{xi} Benjamin Chevat and Terri Ann Lowenthal, “Meeting the Challenges of the 2020 Census,” (Washington: Center for American Progress, 2015) available at <https://cdn.americanprogress.org/wp-content/uploads/2015/02/ChevatCensus-report5.pdf>.
- ^{xii} Ibid.
- ^{xiii} Tara Bahrapour, “Census watchers warn of a crisis if funding for 2020 count is not increased” *The Washington Post*, April 18, 2017, available at https://www.washingtonpost.com/local/social-issues/census-watchers-warn-of-crisis-if-funding-for-2020-count-is-not-increased/2017/04/17/e6cc170a-20d6-11e7-a0a7-8b2a45e3dc84_story.html?utm_term=.40dfdb091183.
- ^{xiv} “Re: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity” (Washington: Asian Americans Advancing Justice, 2016) available at <http://advancingjustice-aajc.org/sites/default/files/2017-05/Advancing%20Justice%20AAJC%20comments%20FR%20notice%20re%20OMB%20Standards%20re%20Race%20and%20Ethnicity%20April%202017.pdf>.