



Richard J. Fiesta, Chair

August 1, 2018

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

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

Dear Ms. Jessup:

The Leadership Council of Aging Organizations (LCAO) is a coalition of 70 national nonprofit organizations concerned with the well-being of America's older population and committed to representing their interests in the policy-making arena. 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 and have nationwide repercussions for the next decade.

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. An accurate census is integral to our democracy, ensuring that district lines are fairly drawn and political representation is justly 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 guide important state and community-level decisions affecting housing, healthcare services, schools, and business investment, to cite a few critical issues dependent on the accuracy of the census.

For older Americans, an accurate census is essential to ensuring federal dollars are fairly and accurately distributed to support programs that help them and their families meet their basic needs. Half of individuals with Medicare have incomes below just \$26,200,¹ and about half of

¹ Kaiser Family Foundation, *Income and Assets of Medicare Beneficiaries, 2016-2035* (Apr 21, 2017), <https://www.kff.org/medicare/issue-brief/income-and-assets-of-medicare-beneficiaries-2016-2035/>.

older Americans receive 50% or more of their household income from Social Security, while one in four receive 90% or more from Social Security.² Numerous federal programs support the basic living standards for millions of older persons, workers and their families with modest and low incomes – helping them put food on the table, pay for their homes and see a doctor.

In fiscal year 2015, the US Census Bureau estimated that census data was used to distribute more than \$675 billion in funds to 132 programs.³ A substantial number of these programs serve older persons, including but not limited to:

- Medical Assistance Program (Medicaid)
- Supplemental Nutrition Assistance Program
- Medicare Part B Physicians Fee Schedule Services
- Section 8 Housing Choice Voucher
- Section 8 Housing Assistance Payments
- Low Income Home Energy Assistance Program
- Community Development Block Grants/Entitlement Grants
- Social Services Block Grant
- Capital Assistance Program for Elderly Persons and Persons with Disabilities
- Senior Community Service Employment Program
- Supportive Housing for the Elderly
- Title VII Programs for Prevention of Elder Abuse, Neglect and Exploitation
- State Grants for Protection and Advocacy Services

Two critical issues that have not been answered are how adding a citizenship question to the census that has not been tested will affect the validity and reliability of responses; and whether a citizenship question will depress participation and therefore limit the ability of the Census Bureau to reach and count all communities equally well. This is especially true because immigrant and minority populations may be afraid of identifying themselves.

Even before Secretary Ross's decision to add a citizenship question to the 2020 Census, the Census Bureau itself had deep concerns about the difficulty of achieving robust participation in many communities. In September 2017, then-Director of the Census John Thompson spoke at LCAO's regular monthly organizational meeting. He discussed the Bureau's move to a digitally-based system of gathering information for the 2020 census, describing the new mechanisms the Bureau will use to obtain data on historically under-counted populations like young children and racial and ethnic minorities. He indicated the Bureau was working with other federal

² Social Security Administration, The Importance of Social Security Benefits to the Income of the Aged Population (2017), <https://www.ssa.gov/policy/docs/ssb/v77n2/v77n2p1.html>.

³ Hotchkiss, Phelan, "Uses of Census Bureau Data in Federal Funds Distribution", US Census Bureau, issued September 2017; <https://www2.census.gov/programs-surveys/decennial/2020/program-management/working-papers/Uses-of-Census-Bureau-Data-in-Federal-Funds-Distribution.pdf>.

agencies to make sure data is collected that is needed for various federal programs, and discussed the cybersecurity procedures necessary to protect the information collected.⁴ In November 2017, the Census Bureau noted in a presentation that there was growing fear and reluctance to fill out the census in the current political climate. A citizenship question is likely to exacerbate those fears.

We note that the decision to add a citizenship question to the formal census has drawn intense opposition from a nonpartisan and ideologically broad group of business leaders, state and local officials, social scientists and civil and human rights advocates who know how much is at stake with jeopardizing a successful, fair and accurate census. The diverse nature of the overwhelming opposition to this question is demonstrated by the more than 160 Republican and Democratic mayors⁵, six former directors of the Census Bureau, two former Commerce Secretaries from Republican and Democratic administrations, 171 civil and human rights groups, more than 600 faith leaders, and more than 120 members of the U.S. House of Representatives who have publicly opposed the request. As former census directors from both Republican and Democratic administrations stated in a January 26, 2018 letter to the Secretary, “We strongly believe that adding an untested question on citizenship status at this late point in the decennial planning process would put the accuracy of the enumeration and success of the census in all communities at grave risk.”

Although we speak on behalf of older persons, the harm from this decision, if it is not reversed, will be universal, causing communities that have historically been undercounted,⁶ including people of color, young children and low-income rural and urban residents, to suffer the most. An untested citizenship question will drive up costs as the Census Bureau struggles to develop new communications and outreach strategies with little time remaining, plan for an expanded field operation, and track down the millions of households more reluctant to participate because of this controversial question. These are some of the concerns that the then-census director expressed to LCAO, long before this question was proposed. To summarize, asking about citizenship status in the current climate of heightened fear and mistrust will only intensify suspicions, depress response rates, cost additional taxpayer money, and thwart an accurate, inclusive 2020 enumeration.

A full, fair and accurate census is absolutely critical for the older adults we represent. For the reasons discussed above, we strongly oppose asking about citizenship status in the 2020 Census

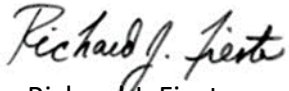
⁴ In February 2017, the GAO identified the 2020 Census as a “High Risk” area, reporting on significant challenges facing implementation. https://www.gao.gov/highrisk/2020_decennial_census/why_did_study.

⁵ U.S. Conference of Mayors, Letter to Sec. Ross opposing addition of a citizenship question to the 2020 Census (Feb. 6, 2018), www.usmayors.org/2018/02/06/over-160-mayors-to-secretary-of-commerce-ross-dont-undercut-cities-work-with-us-to-ensure-u-s-cities-are-treated-fairly-in-the-2020-census/.

⁶ Letter from Attorneys General of 18 states and D.C. and one Governor opposing addition of a citizenship question to the 2020 Census (Feb. 12, 2018), https://oag.ca.gov/system/files/attachments/press_releases/multi-state_letter_2020_census.pdf.

and urge the Department of Commerce to remove the proposed citizenship question from the data collection forms.

Sincerely,

A handwritten signature in black ink that reads "Richard J. Fiesta". The signature is written in a cursive style with a large, prominent "R" and "F".

Richard J. Fiesta
Chair