



August 7, 2018

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

RE: Docket ID USBC-2018-0005

Dear Ms. Jessup:

I write to you as president of Child Trends, a nonpartisan research institution focused exclusively on improving the lives and prospects of children, youth, and their families through rigorous research, to express my deep concern about the inclusion of a new citizenship question in the 2020 Census. This change to the questionnaire has the potential to compound an ongoing problem with undercounting the nation's young children and, consequently, shortchanging their opportunities to share fully in society's benefits.

Child Trends submits two recommendations for your consideration.

First, Child Trends recommends that the citizenship question be removed from the 2020 Census survey to limit the undercount of young children (particularly children of color), safeguard the accuracy of the Census, and reduce bias in the count associated with race and ethnicity.

An accurate Census count is essential for ensuring that programs relied upon by millions of U.S. children are adequately and fairly funded. Currently, programs supporting the well-being of young children (birth to age 5) receive more than \$20 billion annually based on Census counts. Federal funding shares that support states' Medicaid, Children's Health Insurance (CHIP), foster care, and subsidized child care programs all stand to be directly affected by the Census count. Undercounts of young children can cost states important resources. One recent analysis by the George Washington Institute of Public Policy showed that, for every person not counted in the 2010 Census, a state lost \$1,091.ⁱ

The Census Bureau is aware of existing challenges in accurately enumerating young children. Published estimates from the agency suggest that nearly 1 million young children—or 4.6 percent of those between from birth to age 4—were not counted in

2010.ⁱⁱ The agency's research also indicates that people of color, in particular, are most likely to be undercounted.ⁱⁱⁱ We appreciate that the Census Bureau takes this problem very seriously, having established working groups to identify ways to improve the accuracy of future Census efforts.^{iv} However, it is of vital importance that, as the agency focuses its efforts on strategies to address the undercount of young children, it avoids changes to the questionnaire that could further injure the validity of the collection.

Institutions engaged in child research have a special interest in the accuracy of the Census. The Census is, on its own, a critical source of data. However, it also provides the benchmark for many federal surveys that social scientists, government agencies, advocacy groups, and others depend on to track trends in our nation's education, child welfare, juvenile justice, and health institutions. That is, the sampling frame used to administer such surveys—the universe of households and families contacted—is drawn from data collected by the Census. Inaccuracies in the Census will lead to inaccuracies in the federal surveys, such as the National Survey of Children's Health, that depend upon on it. Further, non-federal surveys often use published Census data to adjust their results to reflect the demographic data as collected by the Census.^v

Given the central importance of the Census to multiple sources of data, Child Trends is concerned that the citizenship question may bias data by discouraging immigrant families—including those with authorized and unauthorized status—from responding to the survey. Studies examining low response rates in health research demonstrate that socially stigmatized or vulnerable groups are less likely to participate in data collection efforts when they mistrust the researcher, fear civil authority, or perceive that their participation may cause harm.^{vi,vii} Given recent federal efforts to strengthen immigration enforcement, it is reasonable to assume that families with unauthorized members may fear that responding to the Census could place family members at risk of deportation.

The implications of a citizenship question for an accurate count of Hispanic children are particularly worrisome. As of 2016, one-quarter of all children and youth in the United States are Hispanic (~18 million children).^{viii,ix} Further, estimates suggest that one-quarter of Hispanic children have at least one immigrant parent who is unauthorized,^x even though approximately 94 percent of the children are U.S. citizens.^{xi} At a time when the Census Bureau has acknowledged the need to address the historic undercount of children of color,^{xii} we fear there is a strong likelihood that the citizenship question will undercut such an effort, particularly for Hispanic children.

Second, Child Trends recommends that any new additions to the 2020 Census undergo thorough testing to understand the likely impacts on data quality and comparability.

We also recommend the use of rigorous cognitive testing and pilot fielding to examine the performance of any new item and its impact on response. Given the vital importance of

the Census, any additions should be tested to examine certain issues. These include: 1) whether the item yields a result that aligns with the agency's intent, 2) whether the item yields accurate responses, 3) how the item's positioning in the questionnaire influences responses to other items (i.e., order effects), 4) and estimates of error across jurisdictions by current year and trend.

We are grateful for this opportunity to provide comments and suggestions regarding the 2020 Census. For any questions regarding this letter, please contact Kristen Harper at Child Trends (kharper@childtrends.org; 240-223-9376).

Sincerely,

/s/

Carol Emig,

President

ⁱ Reamer, A. (2018). Counting for Dollars 2020: The Role of the Decennial Census in the Geographic Distribution of Federal Funds. GW Institute of Public Policy, The George Washington University. Available at <https://gwipp.gwu.edu/sites/g/files/zaxdzs2181/f/downloads/GWIPP%20Reamer%20Fiscal%20Impacts%20of%20Census%20Undercount%20on%20FMAP-based%20Programs%2003-19-18.pdf>.

ⁱⁱ United States Census Bureau. (2017). Investigating the 2010 Undercount of Young Children – Analysis of Census Coverage Measurement Results: A New Design for the 21st Century. U.S. Department of Commerce, Economics and Statistics Administration. Available at https://www2.census.gov/programs-surveys/decennial/2020/program-management/final-analysis-reports/2020-2017_04-undercount-children-analysis-coverage.pdf.

ⁱⁱⁱ United States Census Bureau. (2012). Census Bureau Releases Estimates of Undercount and Overcount in the 2010 Census. U.S. Department of Commenters. Available at https://www.census.gov/newsroom/releases/archives/2010_census/cb12-95.html.

^{iv} United States Census Bureau. (2016). Recommendations from the Undercount of Young Children Work Group. Available at <https://www.census.gov/about/cac/nac/wg-undercount-children.html>.

^v Council of Economic Advisers. (2000). The uses of Census data: An analytical review. Retrieved from: <https://clintonwhitehouse3.archives.gov/WH/EOP/CEA/html/censusreview.html>.

^{vi} Bonevski, B., Randell, M., Paul, C., Chapman, K., Twyman, L., et al. (2014). Reaching the hard-to-reach: a systemic review of strategies for improving health and medical research with socially disadvantaged groups. *BMC Medical Research Methodology*, 14 (42). Available at <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3974746/>.

^{vii} Ellard-Gray, A., Jeffrey, N.K., Chouback, M., & Crann, S.E. (2015). Finding the Hidden Participant: Solutions for Recruiting Hidden, Hard-to-Reach, and Vulnerable Populations. *International Journal of Qualitative Methods*: 1-10.

^{viii} US Census Bureau. (2018). American Community Survey 2016 1-year Estimates: B01001- Sex by Age (Hispanic/Latino). Retrieved from <https://factfinder.census.gov/>.

^{ix} US Census Bureau. (2018). American Community Survey 2016 1-year Estimates: B01001- Sex by Age. Retrieved from <https://factfinder.census.gov/>.

^x Clarke, W., Turner, K., & Guzman, L. (2017). One Quarter of Hispanic Children in the United States Have an Unauthorized Immigrant Parent. National Research Center on Hispanic Children and Families.

^{xi} US Census Bureau. (2012). American Community Survey 2012 1-Year Estimates: B05003I -Sex by Age by Nativity and Citizenship Status (Hispanic or Latino). Retrieved from <https://factfinder.census.gov/>.

^{xii} United States Census Bureau. (2012). Census Bureau Releases Estimates of Undercount and Overcount in the 2010 Census. U.S. Department of Commenters. Available at https://www.census.gov/newsroom/releases/archives/2010_census/cb12-95.html.