Washington, D.C., June 8, 2018

I HEREBY CERTIFY that the annexed is a true copy of the complete administrative record
upon which the Secretary of Commerce based his decision to reinstate a question concerning
citizenship on the 2020 Decennial Census. I base this Certification on my personal involvement
with the compilation and review of the documents comprising the administrative record.
A copy of this record is

on file in the U.S. Department of Commerce, 1401 Constitution Ave. NW, Washington, DC 20230

Sahra Park-Su, Senior Policy Advisor

(Official title)

I HEREBY CERTIFY that Sahra Park-Su

who signed the foregoing certificate, is now, and was at the time of signing, the custodian of the complete administrative
record upon which the Secretary of Commerce based his decision to reinstate a question concerning citizenship on the 2020 Decennial Census,

and that full faith and credit should be given his/her certificate as such.

IN WITNESS WHEREOF, I have hereunto subscribed my name,

and caused the seal of the Department of Commerce to be affixed this 8th day of June, eighteen

two thousand eighteen

For the SECRETARY OF COMMERCE:

Certifying Officer
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<td><strong>6- DECISION MEMO</strong></td>
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NO INS
NO FBI
NO CIA
NO IRS

Nadie ajeno a la Oficina del Censo puede acceder a sus datos personales. Es la ley.
No one outside the Census Bureau can access your personal information. That's the law.

One of the most private laws in the United States dictates that the Census Bureau cannot share your personal information with anyone. You are protected whether you are a citizen or not.

This is your future. Don't leave it blank.
Start Here / Please use a black or blue pen.

1 How many people were living or staying in this house, apartment, or mobile home on April 1, 2000?

Number of people

**INCLUDE** in this number:
- foster children, roomers, or housemates
- people staying here on April 1, 2000 who have no other permanent place to stay
- people living here most of the time while working, even if they have another place to live

**DO NOT INCLUDE** in this number:
- college students living away while attending college
- people in a correctional facility, nursing home, or mental hospital on April 1, 2000
- Armed Forces personnel living somewhere else
- people who live or stay at another place most of the time

► Please turn the page and print the names of all the people living or staying here on April 1, 2000.

---

If you need help completing this form, call 1-800-477-9424 between 8:00 a.m. and 9:00 p.m., 7 days a week. The telephone call is free.

TDD - Telephone display device for the hearing impaired. Call 1-800-582-8330 between 8:00 a.m. and 9:00 p.m., 7 days a week. The telephone call is free.

¿NECESITA AYUDA? Si usted necesita ayuda para completar este cuestionario llame al 1-800-477-8642 entre las 8:00 a.m. y las 9:00 p.m., 7 días a la semana. La llamada telefónica es gratis.

The Census Bureau estimates that, for the average household, this form will take about 38 minutes to complete, including the time for reviewing the instructions and answers. Comments about the estimate should be directed to the Associate Director for Finance and Administration, Attn: Paperwork Reduction Project 0607-0856, Room 3104, Federal Building 3, Bureau of the Census, Washington, DC 20233.

Respondents are not required to respond to any information collection unless it displays a valid approval number from the Office of Management and Budget.

OMB No. 0607-0856: Approval Expires 12/31/2003
List of Persons

1. Please be sure you answered question 1 on the front page before continuing.

2. Please print the names of all the people who you indicated in question 1 were living or staying here on April 1, 2000.

Example — Last Name

JOHNSON

First Name MI

ROBIN

Start with the person, or one of the people living here who owns, is buying, or rents this house, apartment, or mobile home. If there is no such person, start with any adult living or staying here.

Person 1 — Last Name

First Name MI

Person 2 — Last Name

First Name MI

Person 3 — Last Name

First Name MI

Person 4 — Last Name

First Name MI

Person 5 — Last Name

First Name MI

Person 6 — Last Name

First Name MI

Person 7 — Last Name

First Name MI

Person 8 — Last Name

First Name MI

Person 9 — Last Name

First Name MI

Person 10 — Last Name

First Name MI

Person 11 — Last Name

First Name MI

Person 12 — Last Name

First Name MI

Next, answer questions about Person 1.
1. What is this person's name? Print the name of Person 1 from page 2.
   Last Name
   First Name

2. What is this person's telephone number? We may contact this person if we don't understand an answer.
   Area Code + Number

3. What is this person's sex? Mark ONE box.
   □ Male
   □ Female

4. What is this person's age and what is this person's date of birth?
   Age on April 1, 2000
   Print numbers in boxes.
   Month  Day  Year of birth

5. Is this person Spanish/Hispanic/Latino? Mark the "No" box if not Spanish/Hispanic/Latino.
   □ No, not Spanish/Hispanic/Latino
   □ Yes, Mexican, Mexican Am., Chicano
   □ Yes, Puerto Rican
   □ Yes, Cuban
   □ Yes, other Spanish/Hispanic/Latino — Print group.

6. What is this person's race? Mark one or more races to indicate what this person considers himself/herself to be.
   □ White
   □ Black, African Am., or Negro
   □ American Indian or Alaska Native — Print name of enrolled or principal tribe.
   □ Asian Indian
   □ Chinese
   □ Filipino
   □ Japanese
   □ Korean
   □ Vietnamese
   □ Other Asian — Print race.
   □ Native Hawaiian
   □ Guamanian or Chamorro
   □ Samoan
   □ Other Pacific Islander — Print race.
   □ Some other race — Print race.

7. What is this person's marital status?
   □ Now married
   □ Widowed
   □ Divorced
   □ Separated
   □ Never married

8. a. At any time since February 1, 2000, has this person attended regular school or college?
   Include only nursery school or preschool, kindergarten, elementary school, and schooling which leads to a high school diploma or a college degree.
   □ No, has not attended since February 1 → Skip to 9
   □ Yes, public school, public college
   □ Yes, private school, private college
b. What grade or level was this person attending?
Mark (X) ONE box.

- Nursery school, preschool
- Kindergarten
- Grade 1 to grade 4
- Grade 5 to grade 8
- Grade 9 to grade 12
- College undergraduate years (freshman to senior)
- Graduate or professional school (for example: medical, dental, or law school)

9. What is the highest degree or level of school this person has COMPLETED? Mark (X) ONE box. If currently enrolled, mark the previous grade or highest degree received.

- No schooling completed
- Nursery school to 4th grade
- 5th grade or 6th grade
- 7th grade or 8th grade
- 9th grade
- 10th grade
- 11th grade
- 12th grade, NO DIPLOMA
- HIGH SCHOOL GRADUATE — high school DIPLOMA or the equivalent (for example: GED)
- Some college credit, but less than 1 year
- 1 or more years of college, no degree
- Associate degree (for example: AA, AS)
- Bachelor’s degree (for example: BA, AB, BS)
- Master’s degree (for example: MA, MS, MEng, Med, MSW, MBA)
- Professional degree (for example: MD, DDS, DVM, LLB, JD)
- Doctorate degree (for example: PhD, EdD)

10. What is this person’s ancestry or ethnic origin?

(For example: Italian, Jamaican, African Am., Cambodian, Cape Verdean, Norwegian, Dominican, French Canadian, Haitian, Korean, Lebanese, Polish, Nigerian, Mexican, Taiwanese, Ukrainian, and so on.)

11. a. Does this person speak a language other than English at home?

- Yes 
- No → Skip to 12

b. What is this language?

(For example: Korean, Italian, Spanish, Vietnamese)

12. c. How well does this person speak English?

- Very well
- Well
- Not well
- Not at all

Where was this person born?

- In the United States — Print name of state.
- Outside the United States — Print name of foreign country, or Puerto Rico, Guam, etc.

13. Is this person a CITIZEN of the United States?

- Yes, born in the United States → Skip to 15a
- Yes, born in Puerto Rico, Guam, the U.S. Virgin Islands, or Northern Marianas
- Yes, born abroad of American parent or parents
- Yes, a U.S. citizen by naturalization
- No, not a citizen of the United States

14. When did this person come to live in the United States? Print numbers in boxes.

Year

15. a. Did this person live in this house or apartment 5 years ago (on April 1, 1995)?

- Person is under 5 years old → Skip to 33
- Yes, this house → Skip to 16
- No, outside the United States — Print name of foreign country, or Puerto Rico, Guam, etc., below; then skip to 16.

- No, different house in the United States
Person 1 (continued)

b. Where did this person live 5 years ago?
   Name of city, town, or post office

Did this person live inside the limits of the city or town?
   ☐ Yes
   ☐ No, outside the city/town limits

Name of county

Name of state

ZIP Code

Does this person have any of the following long-lasting conditions:

a. Blindness, deafness, or a severe vision or hearing impairment? ☐ Yes ☐ No

b. A condition that substantially limits one or more basic physical activities such as walking, climbing stairs, reaching, lifting, or carrying? ☐ Yes ☐ No

Because of a physical, mental, or emotional condition lasting 6 months or more, does this person have any difficulty in doing any of the following activities:

a. Learning, remembering, or concentrating? ☐ Yes ☐ No

b. Dressing, bathing, or getting around inside the home? ☐ Yes ☐ No

c. (Answer if this person is 16 YEARS OLD OR OVER.) Going outside the home alone to shop or visit a doctor’s office? ☐ Yes ☐ No

d. (Answer if this person is 16 YEARS OLD OR OVER.) Working at a job or business? ☐ Yes ☐ No

Was this person under 15 years of age on April 1, 2000?
   ☐ Yes → Skip to 33
   ☐ No

a. Does this person have any of his/her own grandchildren under the age of 18 living in this house or apartment?
   ☐ Yes
   ☐ No → Skip to 20

b. Is this grandparent currently responsible for most of the basic needs of any grandchild(ren) under the age of 18 who live(s) in this house or apartment?
   ☐ Yes
   ☐ No → Skip to 20

c. How long has this grandparent been responsible for the (se) grandchild(ren)? If the grandparent is financially responsible for more than one grandchild, answer the question for the grandchild for whom the grandparent has been responsible for the longest period of time.
   ☐ Less than 6 months
   ☐ 6 to 11 months
   ☐ 1 or 2 years
   ☐ 3 or 4 years
   ☐ 5 years or more

a. Has this person ever served on active duty in the U.S. Armed Forces, military Reserves, or National Guard? Active duty does not include training for the Reserves or National Guard, but DOES include activation, for example, for the Persian Gulf War.
   ☐ Yes, now on active duty
   ☐ Yes, on active duty in past, but not now
   ☐ No, training for Reserves or National Guard only → Skip to 21
   ☐ No, never served in the military → Skip to 21

b. When did this person serve on active duty in the U.S. Armed Forces? Mark [x] a box for EACH period in which this person served.
   ☐ April 1995 or later
   ☐ August 1990 to March 1995 (including Persian Gulf War)
   ☐ September 1980 to July 1990
   ☐ May 1975 to August 1980
   ☐ Vietnam era (August 1964—April 1975)
   ☐ February 1955 to July 1964
   ☐ Korean conflict (June 1950—January 1955)
   ☐ World War II (September 1940—July 1947)
   ☐ Some other time

c. In total, how many years of active-duty military service has this person had?
   ☐ Less than 2 years
   ☐ 2 years or more
21) LAST WEEK, did this person do ANY work for either pay or profit? Mark the "Yes" box even if the person worked only 1 hour, or helped without pay in a family business or farm for 15 hours or more, or was on active duty in the Armed Forces.
   □ Yes
   □ No → Skip to 25a

22) At what location did this person work LAST WEEK? If this person worked at more than one location, print where he or she worked most last week.
   a. Address (Number and street name)

   (If the exact address is not known, give a description of the location such as the building name or the nearest street or intersection.)

   b. Name of city, town, or post office

   c. Is the work location inside the limits of that city or town?
      □ Yes
      □ No, outside the city/town limits

   d. Name of county

   e. Name of U.S. state or foreign country

   f. ZIP Code

23) a. How did this person usually get to work LAST WEEK? If this person usually used more than one method of transportation during the trip, mark the box of the one used for most of the distance.
      □ Car, truck, or van
      □ Bus or trolley bus
      □ Streetcar or trolley car
      □ Subway or elevated
      □ Railroad
      □ Ferryboat
      □ Taxi cab
      □ Motorcycle
      □ Bicycle
      □ Walked
      □ Worked at home → Skip to 27
      □ Other method

   b. How many people, including this person, usually rode to work in the car, truck, or van LAST WEEK?
      □ Drove alone
      □ 2 people
      □ 3 people
      □ 4 people
      □ 5 or 6 people
      □ 7 or more people

24) a. What time did this person usually leave home to go to work LAST WEEK?
      □ a.m.  □ p.m.

   b. How many minutes did it usually take this person to get from home to work LAST WEEK?
      Minutes

25) a. LAST WEEK, was this person on layoff from a job?
      □ Yes → Skip to 25c
      □ No

   b. LAST WEEK, was this person TEMPORARILY absent from a job or business?
      □ Yes, on vacation, temporary illness, labor dispute, etc. → Skip to 26
      □ No → Skip to 25d

   c. Has this person been informed that he or she will be recalled to work within the next 6 months OR been given a date to return to work?
      □ Yes → Skip to 25e
      □ No

   d. Has this person been looking for work during the last 4 weeks?
      □ Yes
      □ No → Skip to 26

   e. LAST WEEK, could this person have started a job if offered one, or returned to work if recalled?
      □ Yes, could have gone to work
      □ No, because of own temporary illness
      □ No, because of all other reasons (in school, etc.)

26) When did this person last work, even for a few days?
   □ 1995 to 2000
   □ 1994 or earlier, or never worked → Skip to 31
Person 1 (continued)

27 Industry or Employer — Describe clearly this person’s chief job activity or business last week. If this person had more than one job, describe the one at which this person worked the most hours. If this person had no job or business last week, give the information for his/her last job or business since 1995.

   a. For whom did this person work? If now on active duty in the Armed Forces, mark X this box → and print the branch of the Armed Forces.

      Name of company, business, or other employer

   b. What kind of business or industry was this?
      Describe the activity at location where employed. (For example: hospital, newspaper publishing, mail order house, auto repair shop, bank)

28 Occupation

   a. What kind of work was this person doing?
      (For example: registered nurse, personnel manager, supervisor of order department, auto mechanic, accountant)

   b. What were this person’s most important activities or duties? (For example: patient care, directing hiring policies, supervising order clerks, repairing automobiles, reconciling financial records)

29 Was this person — Mark X ONE box

   □ Employee of a PRIVATE-FOR-PROFIT company or business or of an individual, for wages, salary, or commissions
   □ Employee of a PRIVATE NOT-FOR-PROFIT, tax-exempt, or charitable organization
   □ Local GOVERNMENT employee (city, county, etc.)
   □ State GOVERNMENT employee
   □ Federal GOVERNMENT employee
   □ SELF-EMPLOYED in own NOT INCORPORATED business, professional practice, or farm
   □ SELF-EMPLOYED in own INCORPORATED business, professional practice, or farm
   □ Working WITHOUT PAY in family business or farm

30 a. LAST YEAR, 1999, did this person work at a job or business at any time?

      □ Yes
      □ No → Skip to 31

   b. How many weeks did this person work in 1999? Count paid vacation, paid sick leave, and military service. Weeks

31 INCOME IN 1999 — Mark X the "Yes" box for each income source received during 1999 and enter the total amount received during 1999 to a maximum of $999,999. Mark X the "No" box if the income source was not received. If net income was a loss, enter the amount and mark X the "Loss" box next to the dollar amount.

      For income received jointly, report, if possible, the appropriate share for each person; otherwise, report the whole amount for only one person and mark X the "No" box for the other person. If exact amount is not known, please give best estimate.

   a. Wages, salary, commissions, bonuses, or tips from all jobs — Report amount before deductions for taxes, bonds, dues, or other items.

      □ Yes  Annual amount — Dollars _________.00

      □ No

   b. Self-employment income from own nonfarm businesses or farm businesses, including proprietorships and partnerships — Report NET income after business expenses.

      □ Yes  Annual amount — Dollars _________.00  □ Loss

      □ No
c. Interest, dividends, net rental income, royalty income, or income from estates and trusts — Report even small amounts credited to an account.

- Yes: Annual amount — Dollars $1,000.00 □ Loss
- No

d. Social Security or Railroad Retirement

- Yes: Annual amount — Dollars $1,000.00
- No

e. Supplemental Security Income (SSI)

- Yes: Annual amount — Dollars $1,000.00
- No

f. Any public assistance or welfare payments from the state or local welfare office

- Yes: Annual amount — Dollars $1,000.00
- No

g. Retirement, survivor, or disability pensions — Do NOT include Social Security.

- Yes: Annual amount — Dollars $1,000.00
- No

h. Any other sources of income received regularly such as Veterans' (VA) payments, unemployment compensation, child support, or alimony — Do NOT include lump-sum payments such as money from an inheritance or sale of a home.

- Yes: Annual amount — Dollars $1,000.00
- No

32) What was this person's total income in 1999? Add entries in questions 31a—31h; subtract any losses. If net income was a loss, enter the amount and mark □ the "Loss" box next to the dollar amount.

Annual amount — Dollars $1,000.00 □ Loss

33) Now, please answer questions 33—53 about your household.

Is this house, apartment, or mobile home —

- Owned by you or someone in this household with a mortgage or loan?
- Owned by you or someone in this household free and clear (without a mortgage or loan)?
- Rented for cash rent?
- Occupied without payment of cash rent?

34) Which best describes this building? Include all apartments, flats, etc., even if vacant.

- A mobile home
- A one-family house detached from any other house
- A one-family house attached to one or more houses
- A building with 2 apartments
- A building with 3 or 4 apartments
- A building with 5 to 9 apartments
- A building with 10 to 19 apartments
- A building with 20 to 49 apartments
- A building with 50 or more apartments
- Boat, RV, van, etc.

35) About when was this building first built?

- 1999 or 2000
- 1995 to 1998
- 1990 to 1994
- 1980 to 1989
- 1970 to 1979
- 1960 to 1969
- 1950 to 1959
- 1940 to 1949
- 1939 or earlier

36) When did this person move into this house, apartment, or mobile home?

- 1999 or 2000
- 1995 to 1998
- 1990 to 1994
- 1980 to 1989
- 1970 to 1979
- 1969 or earlier

37) How many rooms do you have in this house, apartment, or mobile home? Do NOT count bathrooms, porches, balconies, foyers, halls, or half-rooms.

- 1 room
- 2 rooms
- 3 rooms
- 4 rooms
- 5 rooms
- 6 rooms
- 7 rooms
- 8 rooms
- 9 or more rooms
Person 1 (continued)

38. How many bedrooms do you have; that is, how many bedrooms would you list if this house, apartment, or mobile home were on the market for sale or rent?
   - No bedroom
   - 1 bedroom
   - 2 bedrooms
   - 3 bedrooms
   - 4 bedrooms
   - 5 or more bedrooms

39. Do you have COMPLETE plumbing facilities in this house, apartment, or mobile home; that is, 1) hot and cold piped water, 2) a flush toilet, and 3) a bathtub or shower?
   - Yes, have all three facilities
   - No

40. Do you have COMPLETE kitchen facilities in this house, apartment, or mobile home; that is, 1) a sink with piped water, 2) a range or stove, and 3) a refrigerator?
   - Yes, have all three facilities
   - No

41. Is there telephone service available in this house, apartment, or mobile home from which you can both make and receive calls?
   - Yes
   - No

42. Which FUEL is used MOST for heating this house, apartment, or mobile home?
   - Gas: from underground pipes serving the neighborhood
   - Gas: bottled, tank, or LP
   - Electricity
   - Fuel oil, kerosene, etc.
   - Coal or coke
   - Wood
   - Solar energy
   - Other fuel
   - No fuel used

43. How many automobiles, vans, and trucks of one-ton capacity or less are kept at home for use by members of your household?
   - None
   - 1
   - 2
   - 3
   - 4
   - 5
   - 6 or more

44. Answer ONLY if this is a ONE-FAMILY HOUSE OR MOBILE HOME — All others skip to 45.
   a. Is there a business (such as a store or barber shop) or a medical office on this property?
      - Yes
      - No
   b. How many acres is this house or mobile home on?
      - Less than 1 acre — Skip to 45
      - 1 to 9.9 acres
      - 10 or more acres
   c. In 1999, what were the actual sales of all agricultural products from this property?
      - None
      - $2,500 to $4,999
      - $5,000 to $9,999
      - $10,000 or more

45. What are the annual costs of utilities and fuels for this house, apartment, or mobile home? If you have lived here less than 1 year, estimate the annual cost.
   a. Electricity
      Annual cost — Dollars
      - Included in rent or in condominium fee
      - No charge or electricity not used
   b. Gas
      Annual cost — Dollars
      - Included in rent or in condominium fee
      - No charge or gas not used
   c. Water and sewer
      Annual cost — Dollars
      - Included in rent or in condominium fee
      - No charge
   d. Oil, coal, kerosene, wood, etc.
      Annual cost — Dollars
      - Included in rent or in condominium fee
      - No charge or these fuels not used
46. Answer ONLY if you PAY RENT for this house, apartment, or mobile home — All others skip to 47.
   a. What is the monthly rent?
      Monthly amount — Dollars
      $_________00
   b. Does the monthly rent include any meals?
      ☐ Yes  ☐ No

47. Answer questions 47a—53 if you or someone in this household owns or is buying this house, apartment, or mobile home; otherwise, skip to questions for Person 2.
   a. Do you have a mortgage, deed of trust, contract to purchase, or similar debt on THIS property?
      ☐ Yes, mortgage, deed of trust, or similar debt
      ☐ Yes, contract to purchase
      ☐ No → Skip to 48a
   b. How much is your regular monthly mortgage payment on THIS property? Include payment only on first mortgage or contract to purchase.
      Monthly amount — Dollars
      $_________00
      OR
      ☐ No regular payment required → Skip to 48a
   c. Does your regular monthly mortgage payment include payments for real estate taxes on THIS property?
      ☐ Yes, taxes included in mortgage payment
      ☐ No, taxes paid separately or taxes not required
   d. Does your regular monthly mortgage payment include payments for fire, hazard, and flood insurance on THIS property?
      ☐ Yes, insurance included in mortgage payment
      ☐ No, insurance paid separately or no insurance

48. a. Do you have a second mortgage or a home equity loan on THIS property? Mark [X] all boxes that apply.
      ☐ Yes, a second mortgage
      ☐ Yes, a home equity loan
      ☐ No → Skip to 49
   b. How much is your regular monthly payment on all second or junior mortgages and all home equity loans on THIS property?
      Monthly amount — Dollars
      $_________00
      OR
      ☐ No regular payment required

49. What were the real estate taxes on THIS property last year?
   Yearly amount — Dollars
   $_________00
   OR
   ☐ None

50. What was the annual payment for fire, hazard, and flood insurance on THIS property?
   Annual amount — Dollars
   $_________00
   OR
   ☐ None

51. What is the value of this property; that is, how much do you think this house and lot, apartment, or mobile home and lot would sell for if it were for sale?
   ☐ Less than $10,000
   ☐ $10,000 to $14,999
   ☐ $15,000 to $19,999
   ☐ $20,000 to $24,999
   ☐ $25,000 to $29,999
   ☐ $30,000 to $34,999
   ☐ $35,000 to $39,999
   ☐ $40,000 to $49,999
   ☐ $50,000 to $59,999
   ☐ $60,000 to $69,999
   ☐ $70,000 to $79,999
   ☐ $80,000 to $89,999
   ☐ $90,000 to $99,999
   ☐ $100,000 to $124,999
   ☐ $125,000 to $149,999
   ☐ $150,000 to $174,999
   ☐ $175,000 to $199,999
   ☐ $200,000 to $249,999
   ☐ $250,000 to $299,999
   ☐ $300,000 to $399,999
   ☐ $400,000 to $499,999
   ☐ $500,000 to $749,999
   ☐ $750,000 to $999,999
   ☐ $1,000,000 or more

52. Answer ONLY if this is a CONDOMINIUM — What is the monthly condominium fee?
   Monthly amount — Dollars
   $_________00

53. Answer ONLY if this is a MOBILE HOME —
   a. Do you have an installment loan or contract on THIS mobile home?
      ☐ Yes  ☐ No
   b. What was the total cost for installment loan payments, personal property taxes, site rent, registration fees, and license fees on THIS mobile home and its site last year? Exclude real estate taxes.
      Yearly amount — Dollars
      $_________00
      ☐ None

Are there more people living here? If yes, continue with Person 2.
Person 2 (continued)

a. At any time since February 1, 2000, has this person attended regular school or college? Include only nursery school or preschool, kindergarten, elementary school, and schooling which leads to a high school diploma or a college degree.

☐ No, has not attended since February 1 → Skip to 9
☐ Yes, public school, public college
☐ Yes, private school, private college

b. What grade or level was this person attending? Mark ONE box.
☐ Nursery school, preschool
☐ Kindergarten
☐ Grade 1 to grade 4
☐ Grade 5 to grade 8
☐ Grade 9 to grade 12
☐ College undergraduate years (freshman to senior)
☐ Graduate or professional school (for example: medical, dental, or law school)

What is the highest degree or level of school this person has COMPLETED? Mark ONE box. If currently enrolled, mark the previous grade or highest degree received.

☐ No schooling completed
☐ Nursery school to 4th grade
☐ 5th grade or 6th grade
☐ 7th grade or 8th grade
☐ 9th grade
☐ 10th grade
☐ 11th grade
☐ 12th grade, NO DIPLOMA
☐ HIGH SCHOOL GRADUATE — high school DIPLOMA or the equivalent (for example: GED)
☐ Some college credit, but less than 1 year
☐ 1 or more years of college, no degree
☐ Associate degree (for example: AA, AS)
☐ Bachelor’s degree (for example: BA, AB, BS)
☐ Master’s degree (for example: MA, MS, MEng, Med, MSW, MBA)
☐ Professional degree (for example: MD, DDS, DVM, LLB, JD)
☐ Doctorate degree (for example: PhD, EdD)

What is this person’s ancestry or ethnic origin?

(For example: Italian, Jamaican, African Am., Cambodian, Cape Verdean, Norwegian, Dominican, French Canadian, Haitian, Korean, Lebanese, Polish, Nigerian, Mexican, Taiwanese, Ukrainian, and so on.)

a. Does this person speak a language other than English at home?
☐ Yes
☐ No → Skip to 12

b. What is this language?
(For example: Korean, Italian, Spanish, Vietnamese)

c. How well does this person speak English?
☐ Very well
☐ Well
☐ Not well
☐ Not at all

Where was this person born?

☐ In the United States — Print name of state.
☐ Outside the United States — Print name of foreign country, or Puerto Rico, Guam, etc.

Is this person a CITIZEN of the United States?

☐ Yes, born in the United States → Skip to 15a
☐ Yes, born in Puerto Rico, Guam, the U.S. Virgin Islands, or Northern Marianas
☐ Yes, born abroad of American parent or parents
☐ Yes, a U.S. citizen by naturalization
☐ No, not a citizen of the United States

When did this person come to live in the United States? Print numbers in boxes.

Year

a. Did this person live in this house or apartment 5 years ago (on April 1, 1995)?

☐ Person is under 5 years old → Skip to 33
☐ Yes, this house → Skip to 16
☐ No, outside the United States — Print name of foreign country, or Puerto Rico, Guam, etc., below, then skip to 16.

☐ No, different house in the United States
Person 2 (continued)

b. Where did this person live 5 years ago?
Name of city, town, or post office

Did this person live inside the limits of the city or town?
☐ Yes
☐ No, outside the city/town limits
Name of county

Name of state

ZIP Code

Does this person have any of the following long-lasting conditions:

a. Blindness, deafness, or a severe vision or hearing impairment?

b. A condition that substantially limits one or more basic physical activities such as walking, climbing stairs, reaching, lifting, or carrying?

Yes ☐ No ☐

Because of a physical, mental, or emotional condition lasting 6 months or more, does this person have any difficulty in doing any of the following activities:

a. Learning, remembering, or concentrating?

b. Dressing, bathing, or getting around inside the home?

c. (Answer if this person is 16 YEARS OLD OR OVER.) Going outside the home alone to shop or visit a doctor's office?

d. (Answer if this person is 16 YEARS OLD OR OVER.) Working at a job or business?

Was this person under 15 years of age on April 1, 2000?
☐ Yes → Skip to 33
☐ No

a. Does this person have any of his/her own grandchildren under the age of 18 living in this house or apartment?

☐ Yes
☐ No → Skip to 20a

b. Is this grandparent currently responsible for most of the basic needs of any grandchild(ren) under the age of 18 who live(s) in this house or apartment?

☐ Yes
☐ No → Skip to 20a

c. How long has this grandparent been responsible for the(se) grandchild(ren)? If the grandparent is financially responsible for more than one grandchild, answer the question for the grandchild for whom the grandparent has been responsible for the longest period of time.

☐ Less than 6 months
☐ 6 to 11 months
☐ 1 or 2 years
☐ 3 or 4 years
☐ 5 years or more

a. Has this person ever served on active duty in the U.S. Armed Forces, military Reserves, or National Guard? Active duty does not include training for the Reserves or National Guard, but DOES include activation, for example, for the Persian Gulf War.

☐ Yes, now on active duty
☐ Yes, on active duty in past, but not now
☐ No, training for Reserves or National Guard only → Skip to 21
☐ No, never served in the military → Skip to 21

b. When did this person serve on active duty in the U.S. Armed Forces? Mark ☑ a box for EACH period in which this person served.

☐ April 1995 or later
☐ August 1990 to March 1995 (including Persian Gulf War)
☐ September 1980 to July 1990
☐ May 1975 to August 1980
☐ Vietnam era (August 1964—April 1975)
☐ February 1955 to July 1964
☐ Korean conflict (June 1950—January 1955)
☐ World War II (September 1940—July 1947)
☐ Some other time

c. In total, how many years of active-duty military service has this person had?

☐ Less than 2 years
☐ 2 years or more
Person 2 (continued)

21. LAST WEEK, did this person do ANY work for either pay or profit? Mark the "Yes" box even if the person worked only 1 hour, or helped without pay in a family business or farm for 15 hours or more, or was on active duty in the Armed Forces.

☐ Yes
☐ No → Skip to 25a

22. At what location did this person work LAST WEEK? If this person worked at more than one location, print where he or she worked most last week.

a. Address (Number and street name)

(if the exact address is not known, give a description of the location such as the building name or the nearest street or intersection.)

b. Name of city, town, or post office

c. Is the work location inside the limits of that city or town?

☐ Yes
☐ No, outside the city/town limits

d. Name of county

e. Name of U.S. state or foreign country

f. ZIP Code

23. How did this person usually get to work LAST WEEK? If this person usually used more than one method of transportation during the trip, mark the box of the one used for most of the distance.

☐ Car, truck, or van
☐ Bus or trolley bus
☐ Streetcar or trolley car
☐ Subway or elevated
☐ Railroad
☐ Ferryboat
☐ Taxi or cab
☐ Motorcycle
☐ Bicycle
☐ Walked
☐ Worked at home → Skip to 27
☐ Other method

24. If "Car, truck, or van" is marked in 23a, go to 23b. Otherwise, skip to 24a.

b. How many people, including this person, usually rode to work in the car, truck, or van LAST WEEK?

☐ Drove alone
☐ 2 people
☐ 3 people
☐ 4 people
☐ 5 or 6 people
☐ 7 or more people

25. What time did this person usually leave home to go to work LAST WEEK?

☐ a.m.  ☐ p.m.

b. How many minutes did it usually take this person to get from home to work LAST WEEK?

Minutes

26. Answer questions 25–26 for persons who did not work for pay or profit last week. Others skip to 27.

a. LAST WEEK, was this person on layoff from a job?

☐ Yes → Skip to 25c
☐ No

b. LAST WEEK, was this person TEMPORARILY absent from a job or business?

☐ Yes, on vacation, temporary illness, labor dispute, etc. → Skip to 26
☐ No → Skip to 25d

c. Has this person been informed that he or she will be recalled to work within the next 6 months OR been given a date to return to work?

☐ Yes → Skip to 25e
☐ No

d. Has this person been looking for work during the last 4 weeks?

☐ Yes
☐ No → Skip to 26

e. LAST WEEK, could this person have started a job if offered one, or returned to work if recalled?

☐ Yes, could have gone to work
☐ No, because of own temporary illness
☐ No, because of all other reasons (in school, etc.)

27. When did this person last work, even for a few days?

☐ 1995 to 2000
☐ 1994 or earlier, or never worked → Skip to 31
Industry or Employer — Describe clearly this person’s chief job activity or business last week. If this person had more than one job, describe the one at which this person worked the most hours. If this person had no job or business last week, give the information for his/her last job or business since 1995.

a. For whom did this person work? If now on active duty in the Armed Forces, mark ☒ this box → ☐ and print the branch of the Armed Forces.

Name of company, business, or other employer

b. What kind of business or industry was this? Describe the activity at location where employed. (For example: hospital, newspaper publishing, mail order house, auto repair shop, bank)

c. Is this mainly — Mark ☒ ONE box.

☐ Manufacturing?
☐ Wholesale trade?
☐ Retail trade?
☐ Other (agriculture, construction, service, government, etc.)?

Occupation

a. What kind of work was this person doing? (For example: registered nurse, personnel manager, supervisor of order department, auto mechanic, accountant)

b. What were this person’s most important activities or duties? (For example: patient care, directing hiring policies, supervising order clerks, repairing automobiles, reconciling financial records)

Was this person — Mark ☒ ONE box.

☐ Employee of a PRIVATE-FOR-PROFIT company or business or of an individual, for wages, salary, or commissions
☐ Employee of a PRIVATE NOT-FOR-PROFIT, tax-exempt, or charitable organization
☐ Local GOVERNMENT employee (city, county, etc.)
☐ State GOVERNMENT employee
☐ Federal GOVERNMENT employee
☐ SELF-EMPLOYED in own NOT INCORPORATED business, professional practice, or farm
☐ SELF-EMPLOYED in own INCORPORATED business, professional practice, or farm
☐ Working WITHOUT PAY in family business or farm

a. LAST YEAR, 1999, did this person work at a job or business at any time?

☐ Yes
☐ No → Skip to 31

b. How many weeks did this person work in 1999? Count paid vacation, paid sick leave, and military service Weeks

c. During the weeks WORKED in 1999, how many hours did this person usually work each WEEK? Usual hours worked each WEEK

INCOME IN 1999 — Mark ☒ the "Yes" box for each income source received during 1999 and enter the total amount received during 1999 to a maximum of $999,999. Mark ☐ the "No" box if the income source was not received. If net income was a loss, enter the amount and mark ☒ the "Loss" box next to the dollar amount.

For income received jointly, report, if possible, the appropriate share for each person; otherwise, report the whole amount for only one person and mark ☐ the "No" box for the other person. If exact amount is not known, please give best estimate.

a. Wages, salary, commissions, bonuses, or tips from all jobs — Report amount before deductions for taxes, bonds, dues, or other items.

☐ Yes Annual amount — Dollars

☐ No

b. Self-employment income from own nonfarm businesses or farm businesses, including proprietorships and partnerships — Report NET income after business expenses.

☐ Yes Annual amount — Dollars

☐ No
Person 3

What is this person’s name? Print the name of Person 3 from page 2.

First Name

MI

How is this person related to Person 1?

Mark ONE box.

- Husband/wife
- Natural-born son/daughter
- Adopted son/daughter
- Stepson/stepdaughter
- Brother/sister
- Father/mother
- Grandchild
- Parent-in-law
- Son-in-law/daughter-in-law
- Other relative — Print exact relationship.

If NOT RELATED to Person 1:

- Roomer, boarder
- Housemate, roommate
- Unmarried partner
- Foster child
- Other nonrelative

What is this person’s sex?

Mark ONE box.

- Male
- Female

What is this person’s age and what is this person’s date of birth?

Age on April 1, 2000

Print numbers in boxes.

Month Day Year of birth

Form D-2

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5. Is this person Spanish/Hispanic/Latino? Mark \( \times \) the "No" box if not Spanish/Hispanic/Latino.
- No, not Spanish/Hispanic/Latino
- Yes, Mexican, Mexican Am., Chicano
- Yes, Puerto Rican
- Yes, Cuban
- Yes, other Spanish/Hispanic/Latino — Print group.

6. What is this person's race? Mark \( \times \) one or more races to indicate what this person considers himself/herself to be.
- White
- Black, African Am., or Negro
- American Indian or Alaska Native — Print name of enrolled or principal tribe
- Asian Indian
- Chinese
- Filip no
- Japanese
- Korean
- Vietnamese
- Other Asian — Print race
- Native Hawaiian
- Guamanian or Chamorro
- Samoan
- Other Pacific Islander — Print race
- Some other race — Print race.

7. What is this person's marital status?
- Now married
- Widowed
- Divorced
- Separated
- Never married

8. a. At any time since February 1, 2000, has this person attended regular school or college? Include only nursery school or preschool, kindergarten, elementary school, and schooling which leads to a high school diploma or a college degree.
- No, has not attended since February 1 → Skip to 9
- Yes, public school, public college
- Yes, private school, private college

b. What grade or level was this person attending?
Mark \( \times \) ONE box.
- Nursery school, preschool
- Kindergarten
- Grade 1 to grade 4
- Grade 5 to grade 8
- Grade 9 to grade 12
- College undergraduate years (freshman to senior)
- Graduate or professional school (for example: medical, dental, or law school)

9. What is the highest degree or level of school this person has COMPLETED? Mark \( \times \) ONE box.
If currently enrolled, mark the previous grade or highest degree received.
- No schooling completed
- Nursery school to 4th grade
- 5th grade or 6th grade
- 7th grade or 8th grade
- 9th grade
- 10th grade
- 11th grade
- 12th grade, NO DIPLOMA
- HIGH SCHOOL GRADUATE — high school DIPLOMA or the equivalent (for example: GED)
- Some college credit, but less than 1 year
- 1 or more years of college, no degree
- Associate degree (for example: AA, AS)
- Bachelor's degree (for example: BA, AB, BS)
- Master's degree (for example: MA, MS, MEng, MEd, MSW, MBA)
- Professional degree (for example: MD, DDS, DVM, LLB, JD)
- Doctorate degree (for example: PhD, EdD)

10. What is this person's ancestry or ethnic origin?
(For example: Italian, Jamaican, African Am., Cambodian, Cape Verdean, Norwegian, Dominican, French Canadian, Haitian, Korean, Lebanese, Polish, Nigerian, Mexican, Taiwanese, Ukrainian, and so on.)
a. Does this person speak a language other than English at home?
   - Yes
   - No → Skip to 12

b. What is this language?
   (For example: Korean, Italian, Spanish, Vietnamese)

   [Blank]

c. How well does this person speak English?
   - Very well
   - Well
   - Not well
   - Not at all

Where was this person born?
   - In the United States — Print name of state.
   - Outside the United States — Print name of foreign country, or Puerto Rico, Guam, etc.

Is this person a CITIZEN of the United States?
   - Yes, born in the United States → Skip to 15a
   - Yes, born in Puerto Rico, Guam, the U.S. Virgin Islands, or Northern Marianas
   - Yes, born abroad of American parent or parents
   - Yes, a U.S. citizen by naturalization
   - No, not a citizen of the United States

When did this person come to live in the United States? Print numbers in boxes.
   Year

a. Did this person live in this house or apartment 5 years ago (on April 1, 1995)?
   - Person is under 5 years old → Skip to 33
   - Yes, this house → Skip to 16
   - No, outside the United States — Print name of foreign country, or Puerto Rico, Guam, etc., below; then skip to 16.

   - No, different house in the United States

b. Where did this person live 5 years ago?
   - Name of city, town, or post office
   - Did this person live inside the limits of the city or town?
   - Yes
   - No, outside the city/town limits
   - Name of county
   - Name of state
   - ZIP Code

Does this person have any of the following long-lasting conditions:
   a. Blindness, deafness, or a severe vision or hearing impairment?
   - Yes
   - No

b. A condition that substantially limits one or more basic physical activities such as walking, climbing stairs, reaching, lifting, or carrying?
   - Yes
   - No

Because of a physical, mental, or emotional condition lasting 6 months or more, does this person have any difficulty in doing any of the following activities:
   a. Learning, remembering, or concentrating?
   - Yes
   - No

b. Dressing, bathing, or getting around inside the home?
   - Yes
   - No

c. (Answer if this person is 16 YEARS OLD OR OVER.) Going outside the home alone to shop or visit a doctor's office?
   - Yes
   - No

d. (Answer if this person is 16 YEARS OLD OR OVER.) Working at a job or business?
   - Yes
   - No

Was this person under 15 years of age on April 1, 2000?
   - Yes → Skip to 33
   - No
Person 3 (continued)

a. Does this person have any of his/her own grandchildren under the age of 18 living in this house or apartment?

☐ Yes
☐ No → Skip to 20a

b. Is this grandparent currently responsible for most of the basic needs of any grandchild(ren) under the age of 18 who live(s) in this house or apartment?

☐ Yes
☐ No → Skip to 20a

c. How long has this grandparent been responsible for the(se) grandchild(ren)? If the grandparent is financially responsible for more than one grandchild, answer the question for the grandchild for whom the grandparent has been responsible for the longest period of time.

☐ Less than 6 months
☐ 6 to 11 months
☐ 1 or 2 years
☐ 3 or 4 years
☐ 5 years or more

20

a. Has this person ever served on active duty in the U.S. Armed Forces, military Reserves, or National Guard? Active duty does not include training for the Reserves or National Guard, but DOES include activation, for example, for the Persian Gulf War.

☐ Yes, now on active duty
☐ Yes, on active duty in past, but not now
☐ No, training for Reserves or National Guard only → Skip to 21
☐ No, never served in the military → Skip to 21

b. When did this person serve on active duty in the U.S. Armed Forces? Mark ☑ a box for EACH period in which this person served.

☐ April 1995 or later
☐ August 1990 to March 1995 (including Persian Gulf War)
☐ September 1980 to July 1990
☐ May 1975 to August 1980
☐ Vietnam era (August 1964—April 1975)
☐ February 1955 to July 1964
☐ Korean conflict (June 1950—January 1955)
☐ World War II (September 1940—July 1947)
☐ Some other time

c. In total, how many years of active-duty military service has this person had?

☐ Less than 2 years
☐ 2 years or more

21

LAST WEEK, did this person do ANY work for either pay or profit? Mark ☑ the "Yes" box even if the person worked only 1 hour, or helped without pay in a family business or farm for 15 hours or more, or was an active duty in the Armed Forces.

☐ Yes
☐ No → Skip to 25a

22

At what location did this person work LAST WEEK? If this person worked at more than one location, print where he or she worked most last week.

a. Address (Number and street name)

(If the exact address is not known, give a description of the location such as the building name or the nearest street or intersection.)

b. Name of city, town, or post office

c. Is the work location inside the limits of that city or town?

☐ Yes
☐ No, outside the city/town limits

d. Name of county

e. Name of U.S. state or foreign country

f. ZIP Code

23

a. How did this person usually get to work LAST WEEK? If this person usually used more than one method of transportation during the trip, mark ☑ the box of the one used for most of the distance.

☐ Car, truck, or van
☐ Bus or trolley bus
☐ Streetcar or trolley car
☐ Subway or elevated
☐ Railroad
☐ Ferryboat
☐ Taxicab
☐ Motorcycle
☐ Bicycle
☐ Walked
☐ Worked at home → Skip to 27
☐ Other method
Person 3 (continued)

23. If "Car, truck, or van" is marked in 23a, go to 23b. Otherwise, skip to 24a.

b. How many people, including this person, usually rode to work in the car, truck, or van LAST WEEK?
   - Drove alone
   - 2 people
   - 3 people
   - 4 people
   - 5 or 6 people
   - 7 or more people

24. a. What time did this person usually leave home to go to work LAST WEEK?
   - a.m.
   - p.m.

b. How many minutes did it usually take this person to get from home to work LAST WEEK?
   Minutes

25. Answer questions 25–26 for persons who did not work for pay or profit last week. Others skip to 27.

a. LAST WEEK, was this person on layoff from a job?
   - Yes → Skip to 25c
   - No

b. LAST WEEK, was this person TEMPORARILY absent from a job or business?
   - Yes, on vacation, temporary illness, labor dispute, etc. → Skip to 25d
   - No → Skip to 25d

c. Has this person been informed that he or she will be recalled to work within the next 6 months or been given a date to return to work?
   - Yes → Skip to 25e
   - No

d. Has this person been looking for work during the last 4 weeks?
   - Yes
   - No → Skip to 26

e. LAST WEEK, could this person have started a job if offered one, or returned to work if recalled?
   - Yes, could have gone to work
   - No, because of own temporary illness
   - No, because of all other reasons (in school, etc.)

26. When did this person last work, even for a few days?
   - 1995 to 2000
   - 1994 or earlier, or never worked → Skip to 31

27. Industry or Employer — Describe clearly this person's chief job activity or business last week. If this person had more than one job, describe the one at which this person worked the most hours. If this person had no job or business last week, give the information for his/her last job or business since 1995.

a. For whom did this person work? If now on active duty in the Armed Forces, mark X this box and print the branch of the Armed Forces:

   Name of company, business, or other employer

b. What kind of business or industry was this?
   Describe the activity at location where employed. (For example: hospital, newspaper publishing, mail order house, auto repair shop, bank)

c. Is this mainly — Mark X ONE box.
   - Manufacturing?
   - Wholesale trade?
   - Retail trade?
   - Other (agriculture, construction, service, government, etc.)?

28. Occupation

a. What kind of work was this person doing?
   (For example: registered nurse, personnel manager, supervisor of order department, auto mechanic, accountant)

b. What were this person's most important activities or duties? (For example: patient care, directing hiring policies, supervising order clerks, repairing automobiles, reconciling financial records)
Was this person — Mark □ ONE box.

- Employee of a PRIVATE-FOR-PROFIT company or business or of an individual, for wages, salary, or commissions.
- Employee of a PRIVATE NOT-FOR-PROFIT, tax-exempt, or charitable organization.
- Local GOVERNMENT employee (city, county, etc.)
- State GOVERNMENT employee.
- Federal GOVERNMENT employee.
- SELF-EMPLOYED in own NOT INCORPORATED business, professional practice, or farm.
- SELF-EMPLOYED in own INCORPORATED business, professional practice, or farm.
- Working WITHOUT PAY in family business or farm.

a. LAST YEAR, 1999, did this person work at a job or business at any time?
- Yes
- No → Skip to 31

b. How many weeks did this person work in 1999? Count paid vacation, paid sick leave, and military service.

Weeks

c. During the weeks WORKED in 1999, how many hours did this person usually work each WEEK? Usual hours worked each WEEK

INCOME IN 1999 — Mark □ the "Yes" box for each income source received during 1999 and enter the total amount received during 1999 to a maximum of $999,999. Mark □ the "No" box if the income source was not received. If net income was a loss, enter the amount and mark □ the "Loss" box next to the dollar amount.

For income received jointly, report, if possible, the appropriate share for each person; otherwise, report the whole amount for only one person and mark □ the "No" box for the other person. If exact amount is not known, please give best estimate.

a. Wages, salary, commissions, bonuses, or tips from all jobs — Report amount before deductions for taxes, bonds, dues, or other items.
- Yes □ Annual amount — Dollars
- No

b. Self-employment income from own nonfarm businesses or farm businesses, including proprietorships and partnerships — Report NET income after business expenses.
- Yes □ Annual amount — Dollars
- No

What was this person’s total income in 1999? Add entries in questions 31a—31h, subtract any losses. If net income was a loss, enter the amount and mark □ the "Loss" box next to the dollar amount.

Annual amount — Dollars
- None OR □ Loss

Are there more people living here? If yes, continue with Person 4.
1. What is this person's name? Print the name of Person 4 from page 2.
   Last Name
   First Name

2. How is this person related to Person 1?
   Mark ☑ ONE box.
   - Husband/wife
   - Natural-born son/daughter
   - Adopted son/daughter
   - Stepson/stepdaughter
   - Brother/sister
   - Father/mother
   - Grandchild
   - Parent-in-law
   - Son-in-law/daughter-in-law
   - Other relative — Print exact relationship.

   If NOT RELATED to Person 1:
   - Roomer, boarder
   - Housemate, roommate
   - Unmarried partner
   - Foster child
   - Other nonrelative

3. What is this person's sex? Mark ☑ ONE box.
   - Male
   - Female

4. What is this person's age and what is this person's date of birth?
   Age on April 1, 2000

   Print numbers in boxes.
   Month   Day   Year of birth

5. Is this person Spanish/Hispanic/Latino? Mark ☑ the "No" box if not Spanish/Hispanic/Latino.
   - No, not Spanish/Hispanic/Latino
   - Yes, Mexican, Mexican Am., Chicano
   - Yes, Puerto Rican
   - Yes, Cuban
   - Yes, other Spanish/Hispanic/Latino — Print group.

6. What is this person's race? Mark ☑ one or more races to indicate what this person considers himself/herself to be.
   - White
   - Black, African Am., or Negro
   - American Indian or Alaska Native — Print name of enrolled or principal tribe.
   - Asian Indian
   - Chinese
   - Filipino
   - Japanese
   - Korean
   - Vietnamese
   - Other Asian — Print race.
   - Native Hawaiian
   - Guamanian or Chamorro
   - Samoan
   - Other Pacific Islander — Print race.
   - Some other race — Print race.

7. What is this person's marital status?
   - Now married
   - Widowed
   - Divorced
   - Separated
   - Never married
Person 4 (continued)

8. At any time since February 1, 2000, has this person attended regular school or college? Include only nursery school or preschool, kindergarten, elementary school, and schooling which leads to a high school diploma or a college degree.
   - No, has not attended since February 1 → Skip to 9
   - Yes, public school, public college
   - Yes, private school, private college

b. What grade or level was this person attending?
   Mark [X] ONE box.
   - Nursery school, preschool
   - Kindergarten
   - Grade 1 to grade 4
   - Grade 5 to grade 8
   - Grade 9 to grade 12
   - College undergraduate years (freshman to senior)
   - Graduate or professional school (for example: medical, dental, or law school)

9. What is the highest degree or level of school this person has COMPLETED? Mark [X] ONE box. If currently enrolled, mark the previous grade or highest degree received.
   - No schooling completed
   - Nursery school to 4th grade
   - 5th grade or 6th grade
   - 7th grade or 8th grade
   - 9th grade
   - 10th grade
   - 11th grade
   - 12th grade, NO DIPLOMA
   - HIGH SCHOOL GRADUATE — high school DIPLOMA or the equivalent (for example: GED)
   - Some college credit, but less than 1 year
   - 1 or more years of college, no degree
   - Associate degree (for example: AA, AS)
   - Bachelor’s degree (for example: BA, AB, BS)
   - Master’s degree (for example: MA, MS, MEng, MEd, MSW, MBA)
   - Professional degree (for example: MD, DDS, DVM, LLB, JD)
   - Doctorate degree (for example: PhD, EdD)

10. What is this person's ancestry or ethnic origin?
   (For example: Italian, Jamaican, African Am., Cambodian, Cape Verdean, Norwegian, Dominican, French Canadian, Haitian, Korean, Lebanese, Polish, Haitian, Korean, Lebanean, Polish, Nigerian, Mexican, Taiwanese, Ukrainian, and so on.)

11. a. Does this person speak a language other than English at home?
   - Yes
   - No → Skip to 12

b. What is this language?
   (For example: Korean, Italian, Spanish, Vietnamese)

c. How well does this person speak English?
   - Very well
   - Well
   - Not well
   - Not at all

12. Where was this person born?
   - In the United States — Print name of state.
   - Outside the United States — Print name of foreign country, or Puerto Rico, Guam, etc.

13. Is this person a CITIZEN of the United States?
   - Yes, born in the United States → Skip to 15a
   - Yes, born in Puerto Rico, Guam, the U.S. Virgin Islands, or Northern Mariana Islands
   - Yes, born abroad of American parent or parents
   - Yes, a U.S. citizen by naturalization
   - No, not a citizen of the United States

14. When did this person come to live in the United States? Print numbers in boxes.
   Year

15. a. Did this person live in this house or apartment 5 years ago (on April 1, 1995)?
   - Person is under 5 years old → Skip to 33
   - Yes, this house → Skip to 16
   - No, outside the United States — Print name of foreign country, or Puerto Rico, Guam, etc., below, then skip to 16.

   - No, different house in the United States

   □ No, different house in the United States
b. Where did this person live 5 years ago?
Name of city, town, or post office

Did this person live inside the limits of the city or town?
☐ Yes
☐ No, outside the city/town limits

Name of county

Name of state

ZIP Code

16 Does this person have any of the following long-lasting conditions:

a. Blindness, deafness, or a severe vision or hearing impairment?  
☐ Yes  ☐ No

b. A condition that substantially limits one or more basic physical activities such as walking, climbing stairs, reaching, lifting, or carrying?  
☐ Yes  ☐ No

17 Because of a physical, mental, or emotional condition lasting 6 months or more, does this person have any difficulty in doing any of the following activities:

a. Learning, remembering, or concentrating?  
☐ Yes  ☐ No

b. Dressing, bathing, or getting around inside the home?  
☐ Yes  ☐ No

c. (Answer if this person is 16 YEARS OLD OR OVER.) Going outside the home alone to shop or visit a doctor's office?  
☐ Yes  ☐ No

d. (Answer if this person is 16 YEARS OLD OR OVER.) Working at a job or business?  
☐ Yes  ☐ No

18 Was this person under 15 years of age on April 1, 2000?
☐ Yes → Skip to 33
☐ No

19 a. Does this person have any of his/her own grandchildren under the age of 18 living in this house or apartment?
☐ Yes
☐ No → Skip to 20a

b. Is this grandparent currently responsible for most of the basic needs of any grandchild(ren) under the age of 18 who live(s) in this house or apartment?
☐ Yes
☐ No → Skip to 20a

c. How long has this grandparent been responsible for the(se) grandchild(ren)? If the grandparent is financially responsible for more than one grandchild, answer the question for the grandchild for whom the grandparent has been responsible for the longest period of time.
☐ Less than 6 months
☐ 6 to 11 months
☐ 1 or 2 years
☐ 3 or 4 years
☐ 5 years or more

20 a. Has this person ever served on active duty in the U.S. Armed Forces, military Reserves, or National Guard? Active duty does not include training for the Reserves or National Guard, but DOES include activation, for example, for the Persian Gulf War.
☐ Yes, now on active duty
☐ Yes, on active duty in past, but not now
☐ No, training for Reserves or National Guard only → Skip to 21
☐ No, never served in the military → Skip to 21

b. When did this person serve on active duty in the U.S. Armed Forces? Mark [X] a box for EACH period in which this person served.
☐ April 1995 or later
☐ August 1990 to March 1995 (including Persian Gulf War)
☐ September 1980 to July 1990
☐ May 1975 to August 1980
☐ Vietnam era (August 1964—April 1975)
☐ February 1955 to July 1964
☐ Korean conflict (June 1950—January 1955)
☐ World War II (September 1940—July 1947)
☐ Some other time

c. In total, how many years of active-duty military service has this person had?
☐ Less than 2 years
☐ 2 years or more
LAST WEEK, did this person do ANY work for either pay or profit? Mark the "Yes" box even if the person worked only 1 hour, or helped without pay in a family business or farm for 15 hours or more, or was on active duty in the Armed Forces.

- Yes
- No → Skip to 25a

At what location did this person work LAST WEEK? If this person worked at more than one location, print where he or she worked most last week.

a. Address (Number and street name)

(b) Name of city, town, or post office

c. Is the work location inside the limits of that city or town?
- Yes
- No, outside the city/town limits

d. Name of county

e. Name of U.S. state or foreign country

f. ZIP Code

How did this person usually get to work LAST WEEK? If this person usually used more than one method of transportation during the trip, mark the box of the one used for most of the distance.

- Car, truck, or van
- Bus or trolley bus
- Streetcar or trolley car
- Subway or elevated
- Railroad
- Ferryboat
- Taxi cab
- Motorcycle
- Bicycle
- Walked
- Worked at home → Skip to 27
- Other method

If "Car, truck, or van" is marked in 23a, go to 23b. Otherwise, skip to 24a.

b. How many people, including this person, usually rode to work in the car, truck, or van LAST WEEK?

- Drove alone
- 2 people
- 3 people
- 4 people
- 5 or 6 people
- 7 or more people

What time did this person usually leave home to go to work LAST WEEK?

- a.m.
- p.m.

How many minutes did it usually take this person to get from home to work LAST WEEK?

Minutes

Answer questions 25–26 for persons who did not work for pay or profit last week. Others skip to 27.

a. LAST WEEK, was this person on layoff from a job?

- Yes → Skip to 25c
- No

b. LAST WEEK, was this person TEMPORARILY absent from a job or business?

- Yes, on vacation, temporary illness, labor dispute, etc. → Skip to 26
- No → Skip to 25d

c. Has this person been informed that he or she will be recalled to work within the next 6 months OR been given a date to return to work?

- Yes → Skip to 25e
- No

d. Has this person been looking for work during the last 4 weeks?

- Yes
- No → Skip to 26

e. LAST WEEK, could this person have started a job if offered one, or returned to work if recalled?

- Yes, could have gone to work
- No, because of own temporary illness
- No, because of all other reasons (in school, etc.)

When did this person last work, even for a few days?

- 1995 to 2000
- 1994 or earlier, or never worked → Skip to 31
Person 4 (continued)

Industry or Employer — Describe clearly this person's chief job activity or business last week. If this person had more than one job, describe the one at which this person worked the most hours. If this person had no job or business last week, give the information for his/her last job or business since 1995.

a. For whom did this person work? If now on active duty in the Armed Forces, mark X this box → □ and print the branch of the Armed Forces.

Name of company, business, or other employer

b. What kind of business or industry was this? Describe the activity at location where employed. (For example: hospital, newspaper publishing, mail order house, auto repair shop, bank)

c. Is this mainly — Mark X ONE box.

□ Manufacturing?
□ Wholesale trade?
□ Retail trade?
□ Other (agriculture, construction, service, government, etc.)?

Occupation

a. What kind of work was this person doing? (For example: registered nurse, personnel manager, supervisor of order department, auto mechanic, accountant)

b. What were this person's most important activities or duties? (For example: patient care, directing hiring policies, supervising order clerks, repairing automobiles, reconciling financial records)

Was this person — Mark X ONE box.

□ Employee of a PRIVATE-FOR-PROFIT company or business or of an individual, for wages, salary, or commissions
□ Employee of a PRIVATE NOT-FOR-PROFIT, tax-exempt, or charitable organization
□ Local GOVERNMENT employee (city, county, etc.)
□ State GOVERNMENT employee
□ Federal GOVERNMENT employee
□ SELF-EMPLOYED in own NOT INCORPORATED business, professional practice, or farm
□ SELF-EMPLOYED in own INCORPORATED business, professional practice, or farm
□ Working WITHOUT PAY in family business or farm

a. LAST YEAR, 1999, did this person work at a job or business at any time?

□ Yes
□ No → Skip to 31

b. How many weeks did this person work in 1999? Count paid vacation, paid sick leave, and military service. Weeks

c. During the weeks WORKED in 1999, how many hours did this person usually work each WEEK? Usual hours worked each WEEK

INCOME IN 1999 — Mark X the "Yes" box for each income source received during 1999 and enter the total amount received during 1999 to a maximum of $999,999. Mark X the "No" box if the income source was not received. If net income was a loss, enter the amount and mark X the "Loss" box next to the dollar amount.

For income received jointly, report, if possible, the appropriate share for each person; otherwise, report the whole amount for only one person and mark X the "No" box for the other person. If exact amount is not known, please give best estimate.

a. Wages, salary, commissions, bonuses, or tips from all jobs — Report amount before deductions for taxes, bonds, dues, or other items.

□ Yes Annual amount — Dollars $________.00
□ No

b. Self-employment income from own nonfarm businesses or farm businesses, including proprietorships and partnerships — Report NET income after business expenses.

□ Yes Annual amount — Dollars $________.00 □ Loss
□ No
Person 4 (continued)

31. c. Interest, dividends, net rental income, royalty income, or income from estates and trusts — Report even small amounts credited to an account.  
   - Yes: Annual amount — Dollars $___________.00  
   - No

d. Social Security or Railroad Retirement  
   - Yes: Annual amount — Dollars $___________.00  
   - No

e. Supplemental Security Income (SSI)  
   - Yes: Annual amount — Dollars $___________.00  
   - No

f. Any public assistance or welfare payments from the state or local welfare office  
   - Yes: Annual amount — Dollars $___________.00  
   - No

g. Retirement, survivor, or disability pensions — Do NOT include Social Security.  
   - Yes: Annual amount — Dollars $___________.00  
   - No

h. Any other sources of income received regularly such as Veterans' (VA) payments, unemployment compensation, child support, or alimony — Do NOT include lump-sum payments such as money from an inheritance or sale of a home.  
   - Yes: Annual amount — Dollars $___________.00  
   - No

32. What was this person’s total income in 1999? Add entries in questions 31a—31h; subtract any losses. If net income was a loss, enter the amount and mark the “Loss” box next to the dollar amount.  
   - Annual amount — Dollars $___________.00  
   - None OR Loss

33. Are there more people living here? If yes, continue with Person 5.
Person 5 (continued)

5. Is this person Spanish/Hispanic/Latino? Mark the “No” box if not Spanish/Hispanic/Latino.
   - No, not Spanish/Hispanic/Latino
   - Yes, Mexican, Mexican Am., Chicano
   - Yes, Puerto Rican
   - Yes, Cuban
   - Yes, other Spanish/Hispanic/Latino — Print group.

6. What is this person’s race? Mark one or more races to indicate what this person considers himself/herself to be.
   - White
   - Black, African Am., or Negro
   - American Indian or Alaska Native — Print name of enrolled or principal tribe.
   - Asian Indian
   - Chinese
   - Filipino
   - Japanese
   - Korean
   - Vietnamese
   - Other Asian — Print race.
   - Native Hawaiian
   - Guamanian or Chamorro
   - Samoan
   - Other Pacific Islander — Print race.
   - Some other race — Print race.

7. What is this person’s marital status?
   - Now married
   - Widowed
   - Divorced
   - Separated
   - Never married

8. a. At any time since February 1, 2000, has this person attended regular school or college? Include only nursery/school or preschool, kindergarten, elementary school, and schooling which leads to a high school diploma or a college degree.
   - No, not attended since February 1 → Skip to 9
   - Yes, public school, public college
   - Yes, private school, private college

   b. What grade or level was this person attending? Mark ONE box.
   - Nursery school, preschool
   - Kindergarten
   - Grade 1 to grade 4
   - Grade 5 to grade 8
   - Grade 9 to grade 12
   - College undergraduate years (freshman to senior)
   - Graduate or professional school (for example: medical, dental, or law school)

9. What is the highest degree or level of school this person has COMPLETED? Mark ONE box.
   - No schooling completed
   - Nursery school to 4th grade
   - 5th grade or 6th grade
   - 7th grade or 8th grade
   - 9th grade
   - 10th grade
   - 11th grade
   - 12th grade, NO DIPLOMA
   - HIGH SCHOOL GRADUATE — high school DIPLOMA or the equivalent (for example: GED)
   - Some college credit, but less than 1 year
   - 1 or more years of college, no degree
   - Associate degree (for example: AA, AS)
   - Bachelor's degree (for example: BA, AB, BS)
   - Master's degree (for example: MA, MS, MEng, MED, MSW, MBA)
   - Professional degree (for example: MD, DDS, DVM, LLB, JD)
   - Doctorate degree (for example: PhD, EdD)

10. What is this person's ancestry or ethnic origin?

(For example: Italian, Jamaican, African Am., Cambodian, Cape Verdean, Norwegian, Dominican, French Canadian, Haitian, Korean, Lebanese, Polish, Nigerian, Mexican, Taiwanese, Ukrainian, and so on.)
Person 5 (continued)

11. a. Does this person speak a language other than English at home?
   - Yes
   - No → Skip to 12

11. b. What is this language?
   (For example: Korean, Italian, Spanish, Vietnamese)

11. c. How well does this person speak English?
   - Very well
   - Well
   - Not well
   - Not at all

12. Where was this person born?
   - In the United States — Print name of state
   - Outside the United States — Print name of foreign country, or Puerto Rico, Guam, etc.

13. Is this person a CITIZEN of the United States?
   - Yes, born in the United States → Skip to 15a
   - Yes, born in Puerto Rico, Guam, the U.S. Virgin Islands, or Northern Mariana Islands
   - Yes, born abroad of American parent or parents
   - Yes, a U.S. citizen by naturalization
   - No, not a citizen of the United States

14. When did this person come to live in the United States? Print numbers in boxes.
   Year

15. a. Did this person live in this house or apartment 5 years ago (on April 1, 1995)?
   - Person is under 5 years old → Skip to 33
   - Yes, this house → Skip to 16
   - No, outside the United States — Print name of foreign country, or Puerto Rico, Guam, etc., below; then skip to 16.
   - No, different house in the United States

15. b. Where did this person live 5 years ago?
   Name of city, town, or post office

15. Did this person live inside the limits of the city or town?
   - Yes
   - No, outside the city/town limits
   Name of county
   Name of state
   ZIP Code

16. Does this person have any of the following long-lasting conditions:
   a. Blindness, deafness, or a severe vision or hearing impairment?
   b. A condition that substantially limits one or more basic physical activities such as walking, climbing stairs, reaching, lifting, or carrying?

17. Because of a physical, mental, or emotional condition lasting 6 months or more, does this person have any difficulty in doing any of the following activities:
   a. Learning, remembering, or concentrating?
   b. Dressing, bathing, or getting around inside the home?
   c. (Answer if this person is 16 YEARS OLD OR OVER.) Going outside the home alone to shop or visit a doctor's office?
   d. (Answer if this person is 16 YEARS OLD OR OVER.) Working at a job or business?

18. Was this person under 15 years of age on April 1, 2000?
   - Yes → Skip to 33
   - No
Person 5 (continued)

19. a. Does this person have any of his/her own grandchildren under the age of 18 living in this house or apartment?
   - Yes
   - No → Skip to 20a
   
   b. Is this grandparent currently responsible for most of the basic needs of any grandchild(ren) under the age of 18 who live(s) in this house or apartment?
   - Yes
   - No → Skip to 20a
   
   c. How long has this grandparent been responsible for the(se) grandchild(ren)? If the grandparent financially responsible for more than one grandchild, answer the question for the grandchild for whom the grandparent has been responsible for the longest period of time.
   - Less than 6 months
   - 6 to 11 months
   - 1 or 2 years
   - 3 or 4 years
   - 5 years or more
   
20. a. Has this person ever served on active duty in the U.S. Armed Forces, military Reserves, or National Guard? Active duty does not include training for the Reserves or National Guard, but DOES include activation, for example, for the Persian Gulf War.
   - Yes, now on active duty
   - Yes, on active duty in past, but not now
   - No, training for Reserves or National Guard only → Skip to 21
   - No, never served in the military → Skip to 21
   
   b. When did this person serve on active duty in the U.S. Armed Forces? Mark a box for EACH period in which this person served.
   - April 1995 or later
   - August 1990 to March 1995 (including Persian Gulf War)
   - September 1980 to July 1990
   - May 1975 to August 1980
   - Vietnam era (August 1964—April 1975)
   - February 1955 to July 1964
   - Korean conflict (June 1950—January 1955)
   - World War II (September 1940—July 1947)
   - Some other time
   
   c. In total, how many years of active-duty military service has this person had?
   - Less than 2 years
   - 2 years or more

21. LAST WEEK, did this person do ANY work for either pay or profit? Mark the "Yes" box even if the person worked only 1 hour, or helped without pay in a family business or farm for 15 hours or more, or was on active duty in the Armed Forces.
   - Yes
   - No → Skip to 25a

22. At what location did this person work LAST WEEK? If this person worked at more than one location, print where he or she worked most last week:
   a. Address (Number and street name)

   (If the exact address is not known, give a description of the location such as the building name or the nearest street or intersection.)

   b. Name of city, town, or post office

   c. Is the work location inside the limits of that city or town?
   - Yes
   - No, outside the city/town limits

   d. Name of county

   e. Name of U.S. state or foreign country

   f. ZIP Code

23. a. How did this person usually get to work LAST WEEK? If this person usually used more than one method of transportation during the trip, mark the box of the one used for most of the distance.
   - Car, truck, or van
   - Bus or trolley bus
   - Streetcar or trolley car
   - Subway or elevated
   - Railroad
   - Ferryboat
   - Taxicab
   - Motorcycle
   - Bicycle
   - Walked
   - Worked at home → Skip to 27
   - Other method
Person 5 (continued)

23. If "Car, truck, or van" is marked in 23a, go to 23b. Otherwise, skip to 24a.

b. How many people, including this person, usually rode to work in the car, truck, or van LAST WEEK?
   - Drove alone
   - 2 people
   - 3 people
   - 4 people
   - 5 or 6 people
   - 7 or more people

24. a. What time did this person usually leave home to go to work LAST WEEK?
   - a.m.
   - p.m.

b. How many minutes did it usually take this person to get from home to work LAST WEEK?
   Minutes

Answer questions 25–26 for persons who did not work for pay or profit last week. Others skip to 27.

25. a. LAST WEEK, was this person on layoff from a job?
   - Yes → Skip to 25c
   - No

b. LAST WEEK, was this person TEMPORARILY absent from a job or business?
   - Yes, on vacation, temporary illness, labor dispute, etc. → Skip to 26
   - No → Skip to 25d

c. Has this person been informed that he or she will be recalled to work within the next 6 months or been given a date to return to work?
   - Yes → Skip to 25e
   - No

d. Has this person been looking for work during the last 4 weeks?
   - Yes
   - No → Skip to 26

e. LAST WEEK, could this person have started a job if offered one, or returned to work if recalled?
   - Yes, could have gone to work
   - No, because of own temporary illness
   - No, because of all other reasons (in school, etc.)

26. When did this person last work, even for a few days?
   - 1995 to 2000
   - 1994 or earlier, or never worked → Skip to 31

27. Industry or Employer — Describe clearly this person's chief job activity or business last week. If this person had more than one job, describe the one at which this person worked the most hours. If this person had no job or business last week, give the information for his/her last job or business since 1995.

a. For whom did this person work? If now on active duty in the Armed Forces, mark X this box →  and print the branch of the Armed Forces.

Name of company, business, or other employer

b. What kind of business or industry was this?
   Describe the activity at location where employed. (For example: hospital, newspaper publishing, mail order house, auto repair shop, bank)

28. c. Is this mainly — Mark X ONE box.
   - Manufacturing?
   - Wholesale trade?
   - Retail trade?
   - Other (agriculture, construction, service, government, etc.)

Occupation

a. What kind of work was this person doing?
   (For example: registered nurse, personnel manager, supervisor of order department, auto mechanic, accountant)

b. What were this person's most important activities or duties? (For example: patient care, directing hiring policies, supervising order clerks, repairing automobiles, reconciling financial records)
Person 5 (continued)

Was this person — Mark ☑ ONE box.
- Employee of a PRIVATE-FOR-PROFIT company or business or of an individual, for wages, salary, or commissions
- Employee of a PRIVATE NOT-FOR-PROFIT, tax-exempt, or charitable organization
- Local GOVERNMENT employee (city, county, etc.)
- State GOVERNMENT employee
- Federal GOVERNMENT employee
- SELF-EMPLOYED in own NOT INCORPORATED business, professional practice, or farm
- SELF-EMPLOYED in own INCORPORATED business, professional practice, or farm
- Working WITHOUT PAY in family business or farm

a. LAST YEAR, 1999, did this person work at a job or business at any time?
- Yes
- No → Skip to 31

b. How many weeks did this person work in 1999? Count paid vacation, paid sick leave, and military service.

Weeks

c. During the weeks WORKED in 1999, how many hours did this person usually work each WEEK?

Usual hours worked each WEEK

INCOME IN 1999 — Mark ☑ the "Yes" box for each income source received during 1999 and enter the total amount received during 1999 to a maximum of $999,999. Mark ☑ the "No" box if the income source was not received. If net income was a loss, enter the amount and mark ☑ the "Loss" box next to the dollar amount.

For income received jointly, report, if possible, the appropriate share for each person; otherwise, report the whole amount for only one person and mark ☑ the "No" box for the other person. If exact amount is not known, please give best estimate.

a. Wages, salary, commissions, bonuses, or tips from all jobs — Report amount before deductions for taxes, bonds, dues, or other items
- Yes Annual amount — Dollars
- No

b. Self-employment income from own nonfarm businesses or farm businesses, including proprietorships and partnerships — Report NET income after business expenses
- Yes Annual amount — Dollars
- No

c. Interest, dividends, net rental income, royalty income, or income from estates and trusts — Report even small amounts credited to an account.
- Yes Annual amount — Dollars
- No

d. Social Security or Railroad Retirement
- Yes Annual amount — Dollars
- No

e. Supplemental Security Income (SSI)
- Yes Annual amount — Dollars
- No

f. Any public assistance or welfare payments from the state or local welfare office
- Yes Annual amount — Dollars
- No

g. Retirement, survivor, or disability pensions — Do NOT include Social Security.
- Yes Annual amount — Dollars
- No

h. Any other sources of income received regularly such as Veterans’ (VA) payments, unemployment compensation, child support, or alimony — Do NOT include lump-sum payments such as money from an inheritance or sale of a home
- Yes Annual amount — Dollars
- No

What was this person’s total income in 1999? Add entries in questions 31a—31h; subtract any losses. If net income was a loss, enter the amount and mark ☑ the "Loss" box next to the dollar amount.

Annual amount — Dollars
- None OR Loss

Are there more people living here? If yes, continue with Person 6.
Person

Housing information helps your community plan for police and fire protection.

1. What is this person's name? Print the name of Person 6 from page 2.
   Last Name

   First Name

2. How is this person related to Person 1?
   Mark ONE box:
   - Husband/wife
   - Natural-born son/daughter
   - Adopted son/daughter
   - Stepson/stepdaughter
   - Brother/sister
   - Father/mother
   - Grandchild
   - Parent-in-law
   - Son-in-law/daughter-in-law
   - Other relative — Print exact relationship

   If NOT RELATED to Person 1:
   - Roomer, boarder
   - Housemate, roommate
   - Unmarried partner
   - Foster child
   - Other nonrelative

3. What is this person's sex? Mark ONE box.
   - Male
   - Female

4. What is this person's age and what is this person's date of birth?
   Age on April 1, 2000

   Print numbers in boxes.
   Month   Day   Year of birth

Note: Please answer BOTH Questions 5 and 6.

5. Is this person Spanish/Hispanic/Latino? Mark the "No" box if not Spanish/Hispanic/Latino.
   - No, not Spanish/Hispanic/Latino
   - Yes, Mexican, Mexican Am., Chicano
   - Yes, Puerto Rican
   - Yes, Cuban
   - Yes, other Spanish/Hispanic/Latino – Print group.

6. What is this person's race? Mark one or more races to indicate what this person considers himself/herself to be.
   - White
   - Black, African Am., or Negro
   - American Indian or Alaska Native — Print name of enrolled or principal tribe.
   - Asian Indian
   - Chinese
   - Filipino
   - Japanese
   - Korean
   - Vietnamese
   - Other Asian — Print race.
   - Native Hawaiian
   - Guamanian or Chamorro
   - Samoan
   - Other Pacific Islander — Print race.

   - Some other race — Print race.

7. What is this person's marital status?
   - Now married
   - Widowed
   - Divorced
   - Separated
   - Never married
Person 6 (continued)

8. a. At any time since February 1, 2000, has this
   person attended regular school or college? Include
   only nursery school or preschool, kindergarten, elementary
   school, and schooling which leads to a high school
   diploma or a college degree.
   - No, has not attended since February 1 → Skip to 9
   - Yes, public school, public college
   - Yes, private school, private college

   b. What grade or level was this person attending?
   Mark X ONE box.
   - Nursery school, preschool
   - Kindergarten
   - Grade 1 to grade 4
   - Grade 5 to grade 8
   - Grade 9 to grade 12
   - College undergraduate years (freshman to senior)
   - Graduate or professional school (for example:
     medical, dental, or law school)

9. What is the highest degree or level of school
   this person has COMPLETED? Mark X ONE box.
   If currently enrolled, mark the previous grade or
   highest degree received.
   - No schooling completed
   - Nursery school to 4th grade
   - 5th grade or 6th grade
   - 7th grade or 8th grade
   - 9th grade
   - 10th grade
   - 11th grade
   - 12th grade, NO DIPLOMA
   - HIGH SCHOOL GRADUATE — high school DIPLOMA
     or the equivalent (for example: GED)
   - Some college credit, but less than 1 year
   - 1 or more years of college, no degree
   - Associate degree (for example: AA, AS)
   - Bachelor's degree (for example: BA, AB, BS)
   - Master's degree (for example: MA, MS, MEng,
     MEd, MSW, MBA)
   - Professional degree (for example: MD, DDS, DVM,
     LLB, JD)
   - Doctorate degree (for example: PhD, EdD)

10. What is this person's ancestry or ethnic origin?
    (For example: Italian, Jamaican, African Am., Cambodian,
    Cape Verdean, Norwegian, Dominican, French Canadian,
    Haitian, Korean, Lebanese, Polish, Nigerian, Mexican,
    Taiwanese, Ukrainian, and so on.)

11. a. Does this person speak a language other than
    English at home?
    - Yes
    - No → Skip to 12

   b. What is this language?

   (For example: Korean, Italian, Spanish, Vietnamese)

   c. How well does this person speak English?
   - Very well
   - Well
   - Not well
   - Not at all

12. Where was this person born?
   - In the United States — Print name of state.
   - Outside the United States — Print name of foreign
country, or Puerto Rico, Guam, etc.

13. Is this person a CITIZEN of the United States?
   - Yes, born in the United States → Skip to 15a
   - Yes, born in Puerto Rico, Guam, the U.S. Virgin Islands,
or Northern Mariana Islands
   - Yes, born abroad of American parent or parents
   - Yes, a U.S. citizen by naturalization
   - No, not a citizen of the United States

14. When did this person come to live in the
    United States? Print numbers in boxes.
    Year

15. a. Did this person live in this house or apartment
    5 years ago (on April 1, 1995)?
    - Person is under 5 years old → Skip to 33
    - Yes, this house → Skip to 16
    - No, outside the United States — Print name of
      foreign country, or Puerto Rico, Guam, etc., below;
      then skip to 16.
    - No, different house in the United States
b. Where did this person live 5 years ago?
Name of city, town, or post office
Did this person live inside the limits of the city or town?
☐ Yes
☐ No, outside the city/town limits
Name of county
Name of state
ZIP Code

Does this person have any of the following long-lasting conditions:

a. Blindness, deafness, or a severe vision or hearing impairment?
   Yes ☐ No ☐

b. A condition that substantially limits one or more basic physical activities such as walking, climbing stairs, reaching, lifting, or carrying?
   Yes ☐ No ☐

Because of a physical, mental, or emotional condition lasting 6 months or more, does this person have any difficulty in doing any of the following activities:

a. Learning, remembering, or concentrating?
   Yes ☐ No ☐

b. Dressing, bathing, or getting around inside the home?
   Yes ☐ No ☐

c. (Answer if this person is 16 YEARS OLD OR OVER.) Going outside the home alone to shop or visit a doctor's office?
   Yes ☐ No ☐

d. (Answer if this person is 16 YEARS OLD OR OVER.) Working at a job or business?
   Yes ☐ No ☐

Was this person under 15 years of age on April 1, 2000?
☐ Yes → Skip to 33
☐ No

a. Does this person have any of his/her own grandchildren under the age of 18 living in this house or apartment?
   Yes ☐ No → Skip to 20a

b. Is this grandparent currently responsible for most of the basic needs of any grandchild(ren) under the age of 18 who live(s) in this house or apartment?
   Yes ☐ No → Skip to 20a

c. How long has this grandparent been responsible for the(se) grandchild(ren)? If the grandparent is financially responsible for more than one grandchild, answer the question for the grandchild for whom the grandparent has been responsible for the longest period of time.
   Less than 6 months ☐
   6 to 11 months ☐
   1 or 2 years ☐
   3 or 4 years ☐
   5 years or more ☐

a. Has this person ever served on active duty in the U.S. Armed Forces, military Reserves, or National Guard? Active duty does not include training for the Reserves or National Guard, but DOES include activation, for example, for the Persian Gulf War.
   Yes, now on active duty ☐
   Yes, on active duty in past, but not now ☐
   No, training for Reserves or National Guard only → Skip to 21
   No, never served in the military → Skip to 21

b. When did this person serve on active duty in the U.S. Armed Forces? Mark ☒ a box for EACH period in which this person served.
   April 1995 or later ☐
   August 1990 to March 1995 (including Persian Gulf War) ☐
   September 1980 to July 1990 ☐
   May 1975 to August 1980 ☐
   Vietnam era (August 1964—April 1975) ☐
   February 1955 to July 1964 ☐
   Korean conflict (June 1950—January 1955) ☐
   World War II (September 1940—July 1947) ☐
   Some other time ☐

c. In total, how many years of active-duty military service has this person had?
   Less than 2 years ☐
   2 years or more ☐
21 LAST WEEK, did this person do ANY work for either pay or profit? Mark the "Yes" box even if the person worked only 1 hour, or helped without pay in a family business or farm for 15 hours or more, or was on active duty in the Armed Forces.

☐ Yes
☐ No → Skip to 25a

22 At what location did this person work LAST WEEK? If this person worked at more than one location, print where he or she worked most last week.

a. Address (Number and street name)

(If the exact address is not known, give a description of the location such as the building name or the nearest street or intersection.)

b. Name of city, town, or post office

c. Is the work location inside the limits of that city or town?

☐ Yes
☐ No, outside the city/town limits

d. Name of county

e. Name of U.S. state or foreign country

f. ZIP Code

23 a. How did this person usually get to work LAST WEEK? If this person usually used more than one method of transportation during the trip, mark the box of the one used for most of the distance.

☐ Car, truck, or van
☐ Bus or trolley bus
☐ Streetcar or trolley car
☐ Subway or elevated
☐ Railroad
☐ Ferryboat
☐ Taxicab
☐ Motorcycle
☐ Bicycle
☐ Walked
☐ Worked at home → Skip to 27
☐ Other method

24 a. What time did this person usually leave home to go to work LAST WEEK?

☐ a.m.
☐ p.m.

b. How many minutes did it usually take this person to get from home to work LAST WEEK?

Minutes

25 a. LAST WEEK, was this person on layoff from a job?

☐ Yes → Skip to 25c
☐ No

b. LAST WEEK, was this person TEMPORARILY absent from a job or business?

☐ Yes, on vacation, temporary illness, labor dispute, etc. → Skip to 26
☐ No → Skip to 25d

c. Has this person been informed that he or she will be recalled to work within the next 6 months OR been given a date to return to work?

☐ Yes → Skip to 25e
☐ No

d. Has this person been looking for work during the last 4 weeks?

☐ Yes
☐ No → Skip to 26

e. LAST WEEK, could this person have started a job if offered one, or returned to work if recalled?

☐ Yes, could have gone to work
☐ No, because of own temporary illness
☐ No, because of all other reasons (in school, etc.)

26 When did this person last work, even for a few days?

☐ 1995 to 2000
☐ 1994 or earlier, or never worked → Skip to 31
Person 6 (continued)

27 Industry or Employer — Describe clearly this person’s chief job activity or business last week. If this person had more than one job, describe the one at which this person worked the most hours. If this person had no job or business last week, give the information for his/her last job or business since 1995.

a. For whom did this person work? If now on active duty in the Armed Forces, mark X this box → □ and print the branch of the Armed Forces.

Name of company, business, or other employer

b. What kind of business or industry was this? Describe the activity at location where employed. (For example: hospital, newspaper publishing, mail order house, auto repair shop, bank)

28 Occupation

a. What kind of work was this person doing? (For example: registered nurse, personnel manager, supervisor of order department, auto mechanic, accountant)

b. What were this person’s most important activities or duties? (For example: patient care, directing hiring policies, supervising order clerks, repairing automobiles, reconciling financial records)

29 Was this person — Mark X ONE box.

□ Employee of a PRIVATE-FOR-PROFIT company or business or of an individual, for wages, salary, or commissions

□ Employee of a PRIVATE NOT-FOR-PROFIT, tax-exempt, or charitable organization

□ Local GOVERNMENT employee (city, county, etc.)

□ State GOVERNMENT employee

□ Federal GOVERNMENT employee

□ SELF-EMPLOYED in own NOT INCORPORATED business, professional practice, or farm

□ SELF-EMPLOYED in own INCORPORATED business, professional practice, or farm

□ Working WITHOUT PAY in family business or farm

30 a. LAST YEAR, 1999, did this person work at a job or business at any time?

□ Yes

□ No → Skip to 31

b. How many weeks did this person work in 1999? Count paid vacation, paid sick leave, and military service weeks.

31 c. During the weeks WORKED in 1999, how many hours did this person usually work each WEEK? Usual hours worked each WEEK

INCOME IN 1999 — Mark X the “Yes” box for each income source received during 1999 and enter the total amount received during 1999 to a maximum of $999,999. Mark X the “No” box if the income source was not received. If net income was a loss, enter the amount and mark X the “Loss” box next to the dollar amount.

For income received jointly, report, if possible, the appropriate share for each person; otherwise, report the whole amount for only one person and mark X the “No” box for the other person. If exact amount is not known, please give best estimate.

a. Wages, salary, commissions, bonuses, or tips from all jobs — Report amount before deductions for taxes, bonds, dues, or other items.

□ Yes Annual amount — Dollars

□ No

b. Self-employment income from own nonfarm businesses or farm businesses, including proprietorships and partnerships — Report NET income after business expenses.

□ Yes Annual amount — Dollars

□ No

□ Loss
c. Interest, dividends, net rental income, royalty income, or income from estates and trusts — Report even small amounts credited to an account.

☐ Yes  Annual amount — $ _______ .00  ☐ Loss

☐ No

d. Social Security or Railroad Retirement

☐ Yes  Annual amount — $ _______ .00

☐ No

e. Supplemental Security Income (SSI)

☐ Yes  Annual amount — $ _______ .00

☐ No

f. Any public assistance or welfare payments from the state or local welfare office

☐ Yes  Annual amount — $ _______ .00

☐ No

g. Retirement, survivor, or disability pensions — Do NOT include Social Security.

☐ Yes  Annual amount — $ _______ .00

☐ No

h. Any other sources of income received regularly such as Veterans’ (VA) payments, unemployment compensation, child support, or alimony — Do NOT include lump-sum payments such as money from an inheritance or sale of a home.

☐ Yes  Annual amount — $ _______ .00

☐ No

32 What was this person’s total income in 1999? Add entries in questions 31a—31h; subtract any losses. If net income was a loss, enter the amount and mark X the “Loss” box next to the dollar amount.

Annual amount — $ _______ .00  ☐ Loss

33 Thank you for completing your official U.S. Census form. If there are more than six people at this address, the Census Bureau may contact you for the same information about these people.
Person 2

1. What is Person 2's name? Print name below.
   Last Name

2. How is this person related to Person 1? Mark X ONE box.
   - Husband/wife
   - Natural-born son/daughter
   - Adopted son/daughter
   - Stepson/stepdaughter
   - Brother/sister
   - Father/mother
   - Grandchild
   - Parent-in-law
   - Son-in-law/daughter-in-law
   Other relative — Print exact relationship.

3. What is this person's sex? Mark X ONE box.
   - Male
   - Female

4. What is this person's age and what is this person's date of birth?
   Age on Apr 1, 2000
   Month    Day    Year of birth

5. Is this person Spanish/Hispanic/Latino? Mark X the "No" box if not Spanish/Hispanic/Latino.
   - No, not Spanish/Hispanic/Latino
   - Yes, Puerto Rican
   - Yes, Mexican, Mexican Am., Chicano
   - Yes, Cuban
   - Yes, other Spanish/Hispanic/Latino — Print group.

6. What is this person's race? Mark X one or more races to indicate what this person considers himself/herself to be.
   - White
   - Black, African Am., or Negro
   - American Indian or Alaska Native — Print name of enrolled or principal tribe.
   - Asian Indian
   - Japanese
   - Native Hawaiian
   - Chinese
   - Korean
   - Guamanian or Chamorro
   - Filipino
   - Vietnamese
   - Samoan
   - Other Asian — Print race.
   - Other Pacific Islander — Print race.
   - Other race — Print race.

7. If more people live here, continue with Person 3.

Person 3

1. What is Person 3's name? Print name below.
   Last Name

2. How is this person related to Person 1? Mark X ONE box.
   - Husband/wife
   - Natural-born son/daughter
   - Adopted son/daughter
   - Stepson/stepdaughter
   - Brother/sister
   - Father/mother
   - Grandchild
   - Parent-in-law
   - Son-in-law/daughter-in-law
   Other relative — Print exact relationship.

3. What is this person's sex? Mark X ONE box.
   - Male
   - Female

4. What is this person's age and what is this person's date of birth?
   Age on Apr 1, 2000
   Month    Day    Year of birth

5. Is this person Spanish/Hispanic/Latino? Mark X the "No" box if not Spanish/Hispanic/Latino.
   - No, not Spanish/Hispanic/Latino
   - Yes, Puerto Rican
   - Yes, Mexican, Mexican Am., Chicano
   - Yes, Cuban
   - Yes, other Spanish/Hispanic/Latino — Print group.

6. What is this person's race? Mark X one or more races to indicate what this person considers himself/herself to be.
   - White
   - Black, African Am., or Negro
   - American Indian or Alaska Native — Print name of enrolled or principal tribe.
   - Asian Indian
   - Japanese
   - Native Hawaiian
   - Chinese
   - Korean
   - Guamanian or Chamorro
   - Filipino
   - Vietnamese
   - Samoan
   - Other Asian — Print race.
   - Other Pacific Islander — Print race.
   - Other race — Print race.

7. If more people live here, continue with Person 4.
Person 4

What is Person 4's name? Print name below.

Last Name

First Name

MI

2. How is this person related to Person 1? Mark □ ONE box.
   - Husband/wife
   - Natural-born son/daughter
   - Adopted son/daughter
   - Stepson/stepdaughter
   - Brother/sister
   - Father/mother
   - Grandchild
   - Parent-in-law
   - Son-in-law/daughter-in-law
   - Other relative — Print exact relationship.

   If NOT RELATED to Person 1:
   - Roomer, boarder
   - Housemate, roommate
   - Unmarried partner
   - Foster child
   - Other nonrelative

3. What is this person's sex? Mark □ ONE box.
   - Male
   - Female

4. What is this person's age and what is this person's date of birth?
   Print numbers in boxes
   Age on April 1, 2000
   Month
   Day
   Year of birth

5. Is this person Spanish/Hispanic/Latino? Mark □ the "No" box if not Spanish/Hispanic/Latino.
   - No, not Spanish/Hispanic/Latino
   - Yes, Puerto Rican
   - Yes, Mexican, Mexican Am., Chicano
   - Yes, Cuban
   - Yes, other Spanish/Hispanic/Latino — Print group.

6. What is this person's race? Mark □ one or more races to indicate what this person considers himself/herself to be.
   - White
   - Black, African Am., or Negro
   - American Indian or Alaska Native — Print name of enrolled or principal tribe.
   - Asian Indian
   - Japanese
   - Native Hawaiian
   - Chinese
   - Korean
   - Guamanian or Chamorro
   - Filipino
   - Vietnamese
   - Samoan
   - Other Asian — Print race
   - Other Pacific Islander — Print race
   - Some other race — Print race

More people live here, continue with Person 5.

Person 5

What is Person 5's name? Print name below.

Last Name

First Name

MI

2. How is this person related to Person 1? Mark □ ONE box.
   - Husband/wife
   - Natural-born son/daughter
   - Adopted son/daughter
   - Stepson/stepdaughter
   - Brother/sister
   - Father/mother
   - Grandchild
   - Parent-in-law
   - Son-in-law/daughter-in-law
   - Other relative — Print exact relationship.

   If NOT RELATED to Person 1:
   - Roomer, boarder
   - Housemate, roommate
   - Unmarried partner
   - Foster child
   - Other nonrelative

3. What is this person's sex? Mark □ ONE box.
   - Male
   - Female

4. What is this person's age and what is this person's date of birth?
   Print numbers in boxes
   Age on April 1, 2000
   Month
   Day
   Year of birth

5. Is this person Spanish/Hispanic/Latino? Mark □ the "No" box if not Spanish/Hispanic/Latino.
   - No, not Spanish/Hispanic/Latino
   - Yes, Puerto Rican
   - Yes, Mexican, Mexican Am., Chicano
   - Yes, Cuban
   - Yes, other Spanish/Hispanic/Latino — Print group.

6. What is this person's race? Mark □ one or more races to indicate what this person considers himself/herself to be.
   - White
   - Black, African Am., or Negro
   - American Indian or Alaska Native — Print name of enrolled or principal tribe.
   - Asian Indian
   - Japanese
   - Native Hawaiian
   - Chinese
   - Korean
   - Guamanian or Chamorro
   - Filipino
   - Vietnamese
   - Samoan
   - Other Asian — Print race
   - Other Pacific Islander — Print race
   - Some other race — Print race

If more people live here, continue with Person 6.
Person 6

1. What is Person 6's name? Print name below.
   Last Name
   
   First Name

2. How is this person related to Person 1? Mark X ONE box. If NOT RELATED to Person 1:
   - Husband/Wife
   - Natural-born son/daughter
   - Adopted son/daughter
   - Stepson/stepdaughter
   - Brother/sister
   - Father/mother
   - Grandchild
   - Parent-in-law
   - Son-in-law/daughter-in-law
   - Other relative — Print exact relationship

3. What is this person's sex? Mark X ONE box.
   - Male
   - Female

4. What is this person's age and what is this person's date of birth? Print numbers in boxes.
   Age on April 1, 2000
   Month
   Day
   Year of birth

   ➤ NOTE: Please answer BOTH Questions 5 and 6.

5. Is this person Spanish/Hispanic/Latino? Mark X the "No" box if not Spanish/Hispanic/Latino.
   - No, not Spanish/Hispanic/Latino
   - Yes, Puerto Rican
   - Yes, Mexican, Mexican Am., Chicano
   - Yes, Cuban
   - Yes, other Spanish/Hispanic/Latino — Print group

6. What is this person's race? Mark X one or more races to indicate what this person considers himself/herself to be.
   - White
   - Black, African Am., or Negro
   - American Indian or Alaska Native — Print name of enrolled or principal tribe
   - Asian Indian
   - Japanese
   - Native Hawaiian
   - Chinese
   - Korean
   - Guamanian or Chamorro
   - Filipino
   - Vietnamese
   - Samoan
   - Other Asian — Print race
   - Other Pacific Islander — Print race
   - Other other race — Print race

   ➤ If more people live here, list their names on the back of this page in the spaces provided.
### Persons 7 – 12

If you didn’t have room to list everyone who lives in this house or apartment, please list the others below. You may be contacted by the Census Bureau for the same information about these people.

**Person 7 — Last Name**

First Name  
MI

**Person 8 — Last Name**

First Name  
MI

**Person 9 — Last Name**

First Name  
MI

**Person 10 — Last Name**

First Name  
MI

**Person 11 — Last Name**

First Name  
MI

**Person 12 — Last Name**

First Name  
MI

---

The Census Bureau estimates that, for the average household, this form will take about 10 minutes to complete, including the time for reviewing the instructions and answers. Comments about the estimate should be directed to the Associate Director for Finance and Administration, Attn: Paperwork Reduction Project 0607-0856, Room 3104, Federal Building 3, Bureau of the Census, Washington, DC 20233.

Respondents are not required to respond to any information collection unless it displays a valid approval number from the Office of Management and Budget.

---

**Thank you for completing your official U.S. Census 2000 form.**

The "Informational Copy" shows the content of the United States Census 2000 "short" form questionnaire. Each household will receive either a short form (100-percent questions) or a long form (100-percent and sample questions). The short form questionnaire contains 6 population questions and 1 housing question. On average, about 5 in every 6 households will receive the short form. The content of the forms resulted from reviewing the 1990 census data, consulting with federal and non-federal data users, and conducting tests.

For additional information about Census 2000, visit our website at [www.census.gov](http://www.census.gov) or write to the Director, Bureau of the Census, Washington, DC 20233.

---

**For Office Use Only**

- A. JIC1
- B. JIC2
- C. JIC3
- D. JIC4
If you need help completing this form, call 1-800-XXX-XXXX between 8:00 a.m. and 9:00 p.m., 7 days a week. The telephone call is free.

TDD — Telephone display device for the hearing impaired. Call 1-800-XXX-XXXX between 8:00 a.m. and 9:00 p.m., 7 days a week. The telephone call is free.

¿NECESITA AYUDA? Si usted necesita ayuda para completar este cuestionario llame al 1-800-XXX-XXXX entre las 8:00 a.m. y las 9:00 p.m., 7 días a la semana. La llamada telefónica es gratis.
5. Please provide information for each person living here. Start with a person living here who owns or rents this house, apartment, or mobile home. If the owner or renter lives somewhere else, start with any adult living here. This will be Person 1.

<table>
<thead>
<tr>
<th>What is Person 1's name? Print name below.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Last Name:</td>
</tr>
<tr>
<td>First Name:</td>
</tr>
</tbody>
</table>

6. What is Person 1's sex? Mark X ONE box.
   - Male  
   - Female

7. What is Person 1's age and what is Person 1's date of birth?
   Please report babies as age 0 when the child is less than 1 year old.
   Print numbers in boxes.
   - Age on April 1, 2010
   - Month
   - Day
   - Year of birth

→ NOTE: Please answer BOTH Question 8 about Hispanic origin and Question 9 about race. For this census, Hispanic origins are not races.

8. Is Person 1 of Hispanic, Latino, or Spanish origin?
   - No, not Hispanic, Latino, or Spanish origin
   - Yes, Mexican
   - Yes, Mexican American, Chicano
   - Yes, Puerto Rican
   - Yes, Cuban
   - Yes, other Hispanic, Latino, or Spanish origin — Print origin, for example, Argentine, Colombian, Dominican, Nicaraguan, Salvadoran, Spaniard, and so on.

9. What is Person 1's race? Mark X one or more boxes.
   - White
   - Black, African American, or Negro
   - American Indian or Alaska Native — Print name of enrolled or principal tribe.
   - Asian Indian
   - Japanese
   - Chinese
   - Korean
   - Filipino
   - Vietnamese
   - Other Asian — Print race, for example, Hmong, Laotian, Thai, Pakistani, Cambodian, and so on.
   - Native Hawaiian
   - Guamanian or Chamorro
   - Samoan
   - Other Pacific Islander — Print race, for example, Fijian, Tongan, and so on.
   - Some other race — Print race.

10. Does Person 1 sometimes live or stay somewhere else?
    - No  
    - Yes — Mark X all that apply.
      - In college housing
      - In the military
      - At a seasonal or second residence
      - For child custody
      - In jail or prison
      - In a nursing home
      - For another reason

→ If more people were counted in Question 1, continue with Person 2.
1. **Print name of Person 2**

   Last Name: 

   First Name: 

2. How is this person related to Person 1? Mark X ONE box.
   - Husband or wife
   - Biological son or daughter
   - Adopted son or daughter
   - Stepson or stepdaughter
   - Brother or sister
   - Father or mother
   - Grandchild
   - Parent-in-law
   - Son-in-law or daughter-in-law
   - Other relative
   - Roomer or boarder
   - Housemate or roommate
   - Unmarried partner
   - Other nonrelative

3. What is this person's sex? Mark X ONE box.
   - Male
   - Female

4. What is this person's age and what is this person's date of birth?
   Please report babies as age 0 when the child is less than 1 year old.
   Print numbers in boxes.

   Age on April 1, 2010: 
   Month: 
   Day: 
   Year of birth: 

5. Is this person of Hispanic, Latino, or Spanish origin?
   - No, not of Hispanic, Latino, or Spanish origin
   - Yes, Mexican, Mexican Am., Chicano
   - Yes, Puerto Rican
   - Yes, Cuban
   - Yes, another Hispanic, Latino, or Spanish origin — Print origin, for example, Argentinean, Colombian, Dominican, Nicaraguan, Salvadoran, Spaniard, and so on.

6. What is this person's race? Mark X one or more boxes.
   - White
   - Black, African Am., or Negro
   - American Indian or Alaska Native — Print name of enrolled or principal tribe.
   - Asian Indian
   - Japanese
   - Guamanian or Chamorro
   - Native Hawaiian
   - Chinese
   - Korean
   - Samoan
   - Filipino
   - Vietnamese
   - Other Pacific Islander — Print race, for example, Hmong, Laotian, Thai, Pakistani, Cambodian, and so on.

7. Does this person sometimes live or stay somewhere else?
   - No
   - Yes — Mark X all that apply.

   - In college housing
   - In the military
   - At a seasonal or second residence
   - In jail or prison
   - In a nursing home
   - For child custody
   - For another reason

   If more people were counted in Question 1 on the front page, continue with Person 3.

---

1. **Print name of Person 3**

   Last Name: 

   First Name: 

2. How is this person related to Person 1? Mark X ONE box.
   - Husband or wife
   - Biological son or daughter
   - Adopted son or daughter
   - Stepson or stepdaughter
   - Brother or sister
   - Father or mother
   - Grandchild
   - Parent-in-law
   - Son-in-law or daughter-in-law
   - Other relative
   - Roomer or boarder
   - Housemate or roommate
   - Unmarried partner
   - Other nonrelative

3. What is this person's sex? Mark X ONE box.
   - Male
   - Female

4. What is this person's age and what is this person's date of birth?
   Please report babies as age 0 when the child is less than 1 year old.
   Print numbers in boxes.

   Age on April 1, 2010: 
   Month: 
   Day: 
   Year of birth: 

5. Is this person of Hispanic, Latino, or Spanish origin?
   - No, not of Hispanic, Latino, or Spanish origin
   - Yes, Mexican, Mexican Am., Chicanc
   - Yes, Puerto Rican
   - Yes, Cuban
   - Yes, another Hispanic, Latino, or Spanish origin — Print origin, for example, Argentinean, Colombian, Dominican, Nicaraguan, Salvadoran, Spaniard, and so on.

6. What is this person's race? Mark X one or more boxes.
   - White
   - Black, African Am., or Negro
   - American Indian or Alaska Native — Print name of enrolled or principal tribe.
   - Asian Indian
   - Japanese
   - Guamanian or Chamorro
   - Native Hawaiian
   - Chinese
   - Korean
   - Samoan
   - Filipino
   - Vietnamese
   - Other Pacific Islander — Print race, for example, Hmong, Laotian, Thai, Pakistani, Cambodian, and so on.

7. Does this person sometimes live or stay somewhere else?
   - No
   - Yes — Mark X all that apply.

   - In college housing
   - In the military
   - At a seasonal or second residence
   - In jail or prison
   - In a nursing home
   - For child custody
   - For another reason

   If more people were counted in Question 1 on the front page, continue with Person 4.
1. Print name of **Person 4**

   **Last Name**

   **First Name**

   **MI**

2. How is this person related to Person 1? **Mark X ONE box.**
   - Husband or wife
   - Biological son or daughter
   - Adopted son or daughter
   - Stepson or stepdaughter
   - Brother or sister
   - Father or mother
   - Grandchild
   - Parent-in-law
   - Son-in-law or daughter-in-law
   - Other relative
   - Roomer or boarder
   - Housemate or roommate
   - Unmarried partner
   - Other nonrelative

3. What is this person's sex? **Mark X ONE box.**
   - Male
   - Female

4. What is this person's age and what is this person's date of birth? Please report babies as age 0 when the child is less than 1 year old. Print numbers in boxes.
   - Age on April 1, 2010
   - Month
   - Day
   - Year of birth

   → NOTE: Please answer BOTH Question 5 about Hispanic origin and Question 6 about race. For this census, Hispanic origins are not races.

5. Is this person of Hispanic, Latino, or Spanish origin?
   - No, not of Hispanic, Latino, or Spanish origin
   - Yes, Mexican, Mexican Am., Chicano
   - Yes, Puerto Rican
   - Yes, Cuban
   - Yes, another Hispanic, Latino, or Spanish origin — Print origin, for example, Argentine, Colomb, Dominican, Nicaraguan, Salvadoran, Spaniard, and so on.

6. What is this person's race? **Mark X one or more boxes.**
   - White
   - Black, African Am., or Negro
   - American Indian or Alaska Native — Print name of enrolled or principal tribe.
   - Asian Indian
   - Japanese
   - Chinese
   - Korean
   - Filipino
   - Vietnamese
   - Native Hawaiian
   - Guamanian or Chamorro
   - Samoan
   - Other Asian — Print race, for example, Hmong, Laotian, Thai, Pakistani, Cambodian, and so on.
   - Other Pacific Islander — Print race, for example, Fijian, Tongan, and so on.
   - Some other race — Print race.

7. Does this person sometimes live or stay somewhere else?
   - No
   - Yes — **Mark X all that apply.**
     - In college housing
     - In the military
     - At a seasonal or second residence
     - For child custody
     - In jail or prison
     - In a nursing home
     - For another reason

   → If more people were counted in Question 1 on the front page, continue with Person 5.

1. Print name of **Person 5**

   **Last Name**

   **First Name**

   **MI**

2. How is this person related to Person 1? **Mark X ONE box.**
   - Husband or wife
   - Biological son or daughter
   - Adopted son or daughter
   - Stepson or stepdaughter
   - Brother or sister
   - Father or mother
   - Grandchild
   - Parent-in-law
   - Son-in-law or daughter-in-law
   - Other relative
   - Roomer or boarder
   - Housemate or roommate
   - Unmarried partner
   - Other nonrelative

3. What is this person's sex? **Mark X ONE box.**
   - Male
   - Female

4. What is this person's age and what is this person's date of birth? Please report babies as age 0 when the child is less than 1 year old. Print numbers in boxes.
   - Age on April 1, 2010
   - Month
   - Day
   - Year of birth

   → NOTE: Please answer BOTH Question 5 about Hispanic origin and Question 6 about race. For this census, Hispanic origins are not races.

5. Is this person of Hispanic, Latino, or Spanish origin?
   - No, not of Hispanic, Latino, or Spanish origin
   - Yes, Mexican, Mexican Am., Chicano
   - Yes, Puerto Rican
   - Yes, Cuban
   - Yes, another Hispanic, Latino, or Spanish origin — Print origin, for example, Argentine, Colomb, Dominican, Nicaraguan, Salvadoran, Spaniard, and so on.

6. What is this person's race? **Mark X one or more boxes.**
   - White
   - Black, African Am., or Negro
   - American Indian or Alaska Native — Print name of enrolled or principal tribe.
   - Asian Indian
   - Japanese
   - Chinese
   - Korean
   - Filipino
   - Vietnamese
   - Native Hawaiian
   - Guamanian or Chamorro
   - Samoan
   - Other Asian — Print race, for example, Hmong, Laotian, Thai, Pakistani, Cambodian, and so on.
   - Other Pacific Islander — Print race, for example, Fijian, Tongan, and so on.
   - Some other race — Print race.

7. Does this person sometimes live or stay somewhere else?
   - No
   - Yes — **Mark X all that apply.**
     - In college housing
     - In the military
     - At a seasonal or second residence
     - For child custody
     - In jail or prison
     - In a nursing home
     - For another reason

   → If more people were counted in Question 1 on the front page, continue with Person 6.
1. **Print name of Person 6**

<table>
<thead>
<tr>
<th>Last Name</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>First Name</td>
<td></td>
</tr>
</tbody>
</table>

2. **How is this person related to Person 1?**

- [X] Husband or wife
- [ ] Parent-in-law
- [ ] Biological son or daughter
- [ ] Son-in-law or daughter-in-law
- [ ] Adopted son or daughter
- [ ] Other relative
- [ ] Stepson or stepdaughter
- [ ] Roomer or boarder
- [ ] Brother or sister
- [ ] Housemate or roommate
- [ ] Father or mother
- [ ] Unmarried partner
- [ ] Grandchild
- [ ] Other nonrelative

3. **What is this person’s sex?**

- [ ] Male
- [X] Female

4. **What is this person’s age and what is this person’s date of birth?**

<table>
<thead>
<tr>
<th>Age on April 1, 2010</th>
<th>Month</th>
<th>Day</th>
<th>Year of birth</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

→ **NOTE:** Please answer BOTH Question 5 about Hispanic origin and Question 6 about race. For this census, Hispanic origins are not races.

5. **Is this person of Hispanic, Latino, or Spanish origin?**

- [ ] No, not of Hispanic, Latino, or Spanish origin
- [ ] Yes, Mexican, Mexican Am., Chicano
- [ ] Yes, Puerto Rican
- [ ] Yes, Cuban
- [ ] Yes, another Hispanic, Latino, or Spanish origin — Print origin, for example, Argentinean, Colombian, Dominican, Nicaraguan, Salvadoran, Spaniard, and so on.

6. **What is this person’s race?**

- [X] White
- [ ] Black, African Am., or Negro
- [ ] American Indian or Alaska Native — Print name of enrolled or principal tribe.
- [ ] Asian Indian
- [ ] Japanese
- [ ] Korean
- [ ] Vietnamese
- [ ] Other Asian — Print race, for example, Hmong, Laotian, Thai, Pakistani, Cambodian, and so on.
- [ ] Native Hawaiian
- [ ] Guamanian or Chamorro
- [ ] Samoan
- [ ] Other Pacific Islander — Print race, for example, Fijian, Tongan, and so on.
- [ ] Some other race — Print race.

7. **Does this person sometimes live or stay somewhere else?**

- [ ] No
- [X] Yes — Print all that apply.

- [ ] In college housing
- [ ] In the military
- [ ] At a seasonal or second residence
- [ ] For child custody
- [ ] In jail or prison
- [ ] In a nursing home
- [ ] For another reason

→ If more than six people were counted in Question 1 on the front page, turn the page and continue.
Use this section to complete information for the rest of the people you counted in Question 1 on the front page. We may call for additional information about them.

<table>
<thead>
<tr>
<th>Person</th>
<th>Last Name</th>
<th>First Name</th>
<th>MI</th>
</tr>
</thead>
<tbody>
<tr>
<td>Person 7</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sex</td>
<td>Age on April 1, 2010</td>
<td>Date of Birth</td>
<td>Related to Person 1?</td>
</tr>
<tr>
<td></td>
<td>Male</td>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>Female</td>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td>Person 8</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sex</td>
<td>Age on April 1, 2010</td>
<td>Date of Birth</td>
<td>Related to Person 1?</td>
</tr>
<tr>
<td></td>
<td>Male</td>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>Female</td>
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<td>Yes</td>
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<tr>
<td>Person 9</td>
<td></td>
<td></td>
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<tr>
<td>Sex</td>
<td>Age on April 1, 2010</td>
<td>Date of Birth</td>
<td>Related to Person 1?</td>
</tr>
<tr>
<td></td>
<td>Male</td>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td></td>
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<tr>
<td>Person 10</td>
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<td></td>
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<tr>
<td>Sex</td>
<td>Age on April 1, 2010</td>
<td>Date of Birth</td>
<td>Related to Person 1?</td>
</tr>
<tr>
<td></td>
<td>Male</td>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>Female</td>
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<td>Yes</td>
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<tr>
<td>Person 11</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sex</td>
<td>Age on April 1, 2010</td>
<td>Date of Birth</td>
<td>Related to Person 1?</td>
</tr>
<tr>
<td></td>
<td>Male</td>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>Female</td>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td>Person 12</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sex</td>
<td>Age on April 1, 2010</td>
<td>Date of Birth</td>
<td>Related to Person 1?</td>
</tr>
<tr>
<td></td>
<td>Male</td>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>Female</td>
<td></td>
<td>Yes</td>
</tr>
</tbody>
</table>

Thank you for completing your official 2010 Census form.
If your enclosed postage-paid envelope is missing, please mail your completed form to:
U.S. Census Bureau
National Processing Center
1201 East 10th Street
Jeffersonville, IN 47132

If you need help completing this form, call 1-866-872-6868 between 8:00 a.m. and 9:00 p.m.,
7 days a week. The telephone call is free.

TDD — Telephone display device for the hearing impaired. Call 1-866-783-2010 between
8:00 a.m. and 9:00 p.m., 7 days a week. The telephone call is free.

¿NECESITA AYUDA? Si usted necesita ayuda para completar este cuestionario, llame al
1-866-928-2018 entre las 8:00 a.m. y 9:00 p.m., 7 días a la semana. La llamada telefónica
es gratis.

The U.S. Census Bureau estimates that, for the average household, this form will take about 10 minutes to
complete, including the time for reviewing the instructions and answers. Send comments regarding this burden
estimate or any other aspect of this burden to: Paperwork Reduction Project 0607-0919-C, U.S. Census
Bureau, AMSD-SK138, 4600 Silver Hill Road, Washington, DC 20233. You may e-mail comments to
<Paperwork@census.gov>; use "Paperwork Project 0607-0919-C" as the subject.

Respondents are not required to respond to any information collection unless it displays a valid approval
number from the Office of Management and Budget.
MEMORANDUM FOR The Distribution List

From: Burton Reist [signed]
    Acting Chief, Decennial Management Division

Subject: 2010 Census Match Study Report

Attached is the 2010 Census Match Study Report. The Quality Process for the 2010 Census Evaluations, Experiments, and Assessments was applied to the methodology development, specifications, software development, analysis, and documentation of the analysis and results, as necessary.

If you have questions about this report, please contact Sonya Rastogi at (301) 763-6038 or Amy O’Hara at (301) 763-5757.

Attachment
2010 Census Match Study

U.S. Census Bureau standards and quality process procedures were applied throughout the creation of this report.

FINAL REPORT

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Center for Administrative Records Research and Applications
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Executive Summary

Study Overview

To reduce costs many countries use administrative data to assist in censuses or as a replacement to traditional censuses (Farber and Leggieri 2002, Ralphs and Tutton 2011). Currently administrative data are utilized in numerous, critical U.S. Census Bureau programs for population, economic, income and poverty, and health insurance estimates, but administrative data have not yet been extensively used to assist in decennial census operations. The Census Bureau is researching ways in which to use administrative data in decennial census operations to reduce costs.\(^1\) This study, building and expanding on previous research that utilized Census 2000 results, provides a foundation for decennial census operational research on administrative records by assessing the quality and coverage of administrative data relative to the 2010 Census.

In the United States, decennial censuses determine apportionment of state representation to Congress, are used in state redistricting, and are used to distribute billions of federal dollars (Reamer 2010). While households are required by law to participate in the decennial census, there are many households that do not respond to initial contact attempts. This requires the Census Bureau to send enumerators door to door to collect data from non-responding households in decennial census operations called Nonresponse Followup Operations.\(^2\) This effort is expensive for the Census Bureau and was estimated to cost around 1.4 billion dollars in Census 2000 of a total census budget of six billion dollars (Farber and Leggieri 2002, Walker et al. 2012). The estimated cost of these operations in the 2010 Census was about two billion dollars (Walker et al. 2012). Administrative records may be able to assist with expensive operations such as Nonresponse Followup Operations, which would save the government and taxpayers a substantial amount of money.

Census Bureau staff conducted research on the use of federal administrative data utilizing Census 2000 results. The Statistical Administrative Records System (StARS) was developed from select federal data sources in 1999. Decennial census research using these data included address and person count comparisons relative to Census 2000 (Farber and Leggieri 2002). StARS 1999 was also utilized in a field test that simulated a census in several counties during Census 2000 (Berning 2003, Bye and Judson 2004).

The 2010 Census Match Study builds on this research by evaluating the federal data sources used in StARS, additional federal data sources, and commercial data. This report is also distinctive from past research in that it matches addresses and persons in administrative records to the 2010 Census to evaluate the quality and coverage of administrative data. The matching is conducted

\(^1\) For the purposes of this report, “administrative data” and “administrative records” are used interchangeably.
\(^2\) Nonresponse Followup Operations include Nonresponse Followup, Nonresponse Followup Reinterview, Nonresponse Followup Vacant Delete Check, and Nonresponse Followup Residual. For more information, see Walker et al. (2012).
using unique address and person identifiers called master address file identification numbers and protected identification keys assigned by the Person Identification Validation System to addresses and persons in the 2010 Census and administrative records. Using count and match ratios, this study evaluates the administrative data and the 2010 Census at different levels of geography and by factors such as Hispanic origin, race, and mode of data collection. This report also evaluates the quality and coverage of Hispanic origin, race, sex, and age response data in administrative records relative to the 2010 Census.

Results Overview

Addresses

There were 131.7 million addresses in the 2010 Census and 151.3 million addresses in administrative records. Of the 2010 Census addresses, administrative records matched to 122.0 million or 92.6 percent; 29.3 million administrative records addresses were not found in the 2010 Census; and 9.7 million addresses were in the 2010 Census, but not in administrative records. Definitional differences between addresses in the 2010 Census and administrative records contributed to the address non-matches. For instance, there were Post Office Box addresses in administrative data but none in the 2010 Census. The 2010 Census also contained physical descriptions for addresses such as “yellow house near fork in the road” that cannot be matched to administrative records. Additionally, administrative records contained non-residential addresses and may have contained new construction that was not recorded in the 2010 Census.

Persons

The person match ratios were lower than the match ratios for addresses. This is in part because all addresses in the 2010 Census had master address file identification numbers, thus all 2010 Census addresses had the potential to be matched to administrative records addresses with master address file identification numbers. However, in the 2010 Census, not all persons received a protected identification key, reducing the number of persons in the 2010 Census that had the potential to match to administrative records. Protected identification keys were assigned through probabilistic matching to records using name, address, and date of birth information.

There were 308.7 million persons in the 2010 Census, and 279.2 million were assigned a protected identification key. There were 312.2 million unique persons in administrative records that were assigned a protected identification key and were alive on Census Day, April 1, 2010. Administrative records matched to the vast majority of persons in the 2010 Census that received a protected identification key, 273.6 million or 98.0 percent. The percentage of the entire 2010 Census universe, including records lacking protected identification keys, with matching administrative records was lower at 88.6 percent.
There were 29.6 million 2010 Census persons that did not receive a protected identification key. There were 48.8 million administrative records that were assigned a protected identification key, but did not match to the 2010 Census. Future research will study the potential overlap between these universes.

There were 5.5 million 2010 Census persons with protected identification keys that were not found in administrative records data, and most of them were under the age of 17. There were several reasons why administrative data did not cover children as well as other age groups, including timing issues with tax data. Tax return data from the previous tax year failed to include babies born after January 2010, however these children would likely be reported in the 2010 Census, resulting in a lower match between administrative records and the 2010 Census for babies.

**Person-Address Pairs**

The match ratios for person-address pairs (i.e. a person at an address) were lower relative to the address results and person results, in part because the person-address pair data incorporate both address and person matching issues, including the presence of multiple addresses for persons in administrative records. Of the 312.2 million persons in administrative records that had a protected identification key, 301.5 million had a master address file identification number and 10.7 million did not have a master address file identification number. There were 216.2 million person-address pairs in the 2010 Census that matched to administrative records. Of the 308.7 million persons-address pairs in the 2010 Census, 70.0 percent matched to administrative records person-address pairs. Of the 279.2 million person-address pairs in the 2010 Census that had a protected identification key, 77.4 percent matched to administrative records person-address pairs.

After the best address model was applied to persons in administrative records with multiple addresses in administrative records, there were 203.2 million person-address pairs in the 2010 Census that matched to administrative records. Of the 308.7 million persons in the 2010 Census, 65.8 percent matched to administrative records person-address pairs. Of the 279.2 million person-address pairs in the 2010 Census that had a protected identification, 72.8 percent matched to administrative records person-address pairs. There were 98.6 million administrative records person-address pairs that did not match to the 2010 Census. There were 76.0 million person-address pairs that were in the 2010 Census which did not match to person-address pairs in administrative records.

**Demographic Quality and Coverage**

The quality of Hispanic origin response data from federal and commercial files, as defined by response match ratios between the 2010 Census and administrative data, ranged from 29.4 percent to 93.1 percent. Overall, federal data sources tended to have higher quality race data for each race group relative to the commercial data. The quality of race data varied by race group.
The White alone, Black alone, and Asian alone populations tended to have higher quality race data in administrative records compared to Two or More Races, Native Hawaiian or Other Pacific Islander alone, American Indian or Alaska Native alone, and Some Other Race alone populations.

Federal and commercial files had high quality data for age and sex responses. Across federal and commercial files that had date of birth information, the age match ratio ranged from 79.0 percent to 98.5 percent. The sex match ratios ranged from 94.7 percent to 100.0 percent.

The demographic coverage analysis evaluated whether administrative data provided a demographic response to Hispanic origin, race, age, and sex groups in the 2010 Census regardless of the quality of the response. There was a Hispanic origin response present in administrative data for 92.2 percent of non-Hispanic respondents and 78.9 percent of Hispanics in the 2010 Census. The race response coverage in administrative records ranged from 46.1 percent for the Some Other Race alone population to 81.0 percent for the White alone population. Coverage by age group ranged from 84.9 percent to 94.3 percent with older age groups achieving higher coverage relative to younger age groups. Coverage for sex was 90.1 percent, where females had slightly higher coverage (90.8 percent) relative to males (89.3 percent).

Research Implications

1. **Administrative records can enhance, but not replace the decennial census.** While the quality and coverage of administrative records relative to the 2010 Census suggests that administrative records can be utilized in decennial census operations, the quality is not high enough and the coverage is not expansive enough to replace a traditional census.

2. **Use of administrative records in Nonresponse Followup can reduce costs.** Administrative records cover a substantial number of Nonresponse Followup addresses and persons, and nearly half of person-address pairs. Of the 23.6 million addresses that responded in Nonresponse Followup in the 2010 Census, administrative records matched to 21.0 million or 89.2 percent. Administrative records also matched to a substantial number of persons that were in Nonresponse Followup in the 2010 Census. Of the 60.4 million persons in Nonresponse Followup in the 2010 Census, 48.0 million or 79.5 percent were in administrative records. Administrative records matched to a lower number and proportion of person-address pairs in Nonresponse Followup compared to addresses and persons. Of the 60.4 million 2010 person-address pairs in Nonresponse Followup, there were 28.7 million or 47.5 percent that matched to administrative records.

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3 There are 47.2 million housing units in Nonresponse Followup according to the “2010 Census Nonresponse Followup Operations Assessment” (see Walker et al. (2012)). This number is much higher relative to the housing units in this report for several reasons. For instance, the number of Nonresponse Followup housing units in Walker et al. (2012) include vacant, deletes, and unresolved households, whereas the Nonresponse Followup housing units in this report are all occupied.
Research and improvements in record linkage, refinements of the best address model, and acquiring data that cover those most likely to be in Nonresponse Followup may enhance the person-address match between the 2010 Census and administrative records.

3. **Administrative records can assist in determining housing unit and occupancy status.** Administrative records can assist to verify whether a housing unit is a valid livable housing unit and whether it is occupied. Occupancy status results demonstrate the value of administrative records for these purposes. Of the 116.7 million occupied housing units in the 2010 Census, administrative records indicated that 96.1 million or 82.3 percent were occupied. The 2010 Census designated 15.0 million housing units as vacant, of which administrative records found that 11.4 million or 76.1 percent were not occupied. Of the 4.9 million housing units designated as deletes in the 2010 Census, administrative records indicated that 4.2 million or 85.4 percent were not occupied.4

4. **Administrative records can inform household population count assignment.** Administrative records had the same population count for the majority of 2010 Census housing units that matched to administrative records. Of the 116.7 million 2010 Census occupied housing units, 96.1 million matched to administrative records. Of these, 55.5 million or 57.7 percent of housing units had the same population count. When administrative records and the 2010 Census did not have the same population count, the count differed by one person for 63.7 percent of the housing units. Further research should be conducted on this universe.

5. **Acquiring additional federal, state, and commercial data can improve address, person, and demographic characteristic coverage.** Administrative data do not cover children as well as they cover adults. Also, the quality of race and Hispanic origin response data from federal and commercial sources varies considerably by race and Hispanic origin group. The Census Bureau should partner with federal agencies, state agencies, community groups, and other organizations to obtain data that contain information on children living in households, and additional race and Hispanic origin response data should be acquired, particularly for groups where the quality of race or Hispanic origin response data is low in administrative records. Obtaining data for the following groups should be a priority: Two or More Races, Native Hawaiian or Other Pacific Islander, and American Indian or Alaska Native.

6. **Administrative records can inform race and Hispanic origin determination.** For some race and Hispanic origin groups, the quality of administrative records response data was high. For instance, the White alone, Black alone, and Asian alone populations had

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4 Deletes refer to housing units designated for deletion from the address list. Housing units may be identified as deletes for a number of reasons including being demolished, uninhabitable, or nonresidential. Counts of 2010 Census addresses designated as deletes may vary across 2010 Census Program for Evaluations and Experiments reports as a result of different data sets being used for analysis.
relatively high quality race response data in administrative records compared to other race groups. The quality of administrative records files ranged from 94.7 percent to 99.1 percent for the White alone population. The quality of federal data for the Black alone population ranged from 87.4 percent to 98.3 percent. The range was considerably lower for commercial data. For the Asian alone population, the quality of both federal and commercial data ranged from 58.0 percent to 94.1 percent. Data could also be used for other race groups from administrative records, but the quality was generally lower. Research should be conducted on how administrative records can assist with race and Hispanic origin determination for censuses and surveys.

7. **Administrative records can assist age and sex determination.** The quality of age and sex response data in administrative records is high. For sex, the quality of administrative data ranged from 94.7 percent to 100.0 percent across administrative records files. For age, in data sources that contained date of birth, the quality of administrative records ranged from 79.0 percent to 98.5 percent. Research should be conducted on how administrative data can assist with age and sex determination for censuses and surveys.

8. **Conduct additional record linkage research with the aim of improving match results for unvalidated person records.** Many improvements were made to the Person Identification Validation System to enhance the assignment of protected identification keys and master address file identification numbers to administrative records data. Continued record linkage research on the Person Identification Validation System should be conducted to further enhance the assignment of protected identification keys and master address file identification numbers to persons and addresses, potentially increasing the universe of persons and addresses that can be matched and unduplicated between censuses and surveys and administrative records. For instance, of the 308.7 million persons in the 2010 Census, 29.6 million did not receive a protected identification key. Of these, 10.3 million could not be sent through Person Identification Validation System processing because they lacked name and date of birth, and 19.3 million went through Person Identification Validation System processing but failed to receive a protected identification key. Additional research should be conducted on how to minimize this latter universe.

9. **Conduct record linkage research to improve match results for records with incomplete name and date of birth data.** Commercial data sources often lack complete name and date of birth information. Research to unduplicate these records that failed the Person Identification Validation System, and assess the quality of the data is needed. Research on how to use records that lack personally identifiable information is needed, moving the matching approach beyond validation using the Social Security Administration Numerical Identification File.
10. **Conduct record linkage research that improves person record unduplication.** Current record linkage techniques must determine whether two people that look similar are indeed the same person or if they are two different people. Refinements on record linkage techniques will help to more accurately unduplicate person records.

11. **Develop partnerships with federal and state agencies to better understand administrative records and enhance record linkage research.** Partnering with federal and state agencies will facilitate knowledge sharing on the availability of data that could enhance record linkage processes. This knowledge sharing will also benefit administrative records research. For instance, a better understanding of how data were collected could assist in the validation and unduplication process and improve understanding of resulting linkages.

12. **Assess whether an administrative records composite improves missing data assignment.** Building an administrative records composite involves unduplicating records, assigning persons at multiple addresses to one address, and assigning one characteristic to people that have different characteristics across source files. Research should assess the quality of missing data assignment using a composite compared to using all available administrative data.

13. **Analyze linked survey data, especially the American Community Survey, to explore characteristics associated with data coverage and consistency.** Evaluating administrative records relative to the 2010 Census provided important information, at different levels of geography and by certain characteristics, about the quality and coverage of administrative data. Other evaluations using survey data such as the American Community Survey can provide additional insights because the American Community Survey has many additional characteristics that can be analyzed.
1. Introduction

Countries are increasingly adopting the use of administrative records within surveys and censuses to reduce costs. Many European countries such as Austria, Denmark, Finland, the Netherlands, Sweden, and Switzerland already use administrative records in part or entirely in their censuses (Farber and Leggieri 2002, Ralphs and Tutton 2011). Other countries such as England, Canada, Israel, and Italy are researching ways in which to use administrative records in their censuses (Ralphs and Tutton 2011).

At the Census Bureau, uses of administrative records have expanded over the years and are critical to the success of many programs including the Business Register, Intercensal Population Estimates, Local Employer Dynamics, Demographic Analysis Estimates, Small Area Income and Poverty Estimates, and Small Area Health Insurance Estimates. However, the use of administrative records has not been widely adopted within decennial census operations.

External researchers in the 1980s and the National Academies of Sciences in the mid-1990s called for research to be undertaken on the use of administrative records in decennial census operations (Alvey and Scheuren 1982, Edmonston and Schultze 1995, Steffey and Bradburn 1994). This spurred the Census Bureau to develop StARS in 1999. StARS 1999 was constructed and evaluated by Census Bureau staff, and utilized in a Census 2000 field test that simulated an administrative records census in several counties (Farber and Leggieri 2002, Berning 2003, Bye and Judson 2004). The 2010 Census Match Study builds upon and expands this research.

The 2010 Census Match Study is the first study that links administrative records to decennial census results to evaluate the quality and coverage of administrative records. This study evaluates counts and matches of addresses and persons, and persons at addresses at different levels of geography and by factors such as Hispanic origin, race, and mode of data collection. This report also evaluates the quality and coverage of Hispanic origin, race, sex, and age data in administrative records relative to the 2010 Census.

2. Background

2.1 Administrative Records in Census Programs

Many important programs at the Census Bureau utilize administrative records extensively. Administrative records are used to update the Business Register, the survey frame for the Economic Census, and most monthly, quarterly, and annual economic surveys. The Population Estimates program utilizes administrative birth and death data, as well as data from Medicare, to produce annual estimates of the U.S. population at the national, state, and county levels. Uses of these estimates include federal funding allocations and survey controls. Additionally, the Local Employment Dynamics program utilizes labor market data from states to develop critical information on employment, job creation, turnover, and earnings. Demographic Analysis
Estimates utilize administrative birth and death data, as well as data from Medicare, to assess the coverage of decennial censuses.

To help inform the administration of federal programs and the allocation of federal funds to local jurisdictions, the Small Area Income and Poverty Estimates program develops current selected income and poverty estimates for states, counties, and school districts using a combination of American Community Survey (ACS) data, administrative records, population estimates, and decennial census data. The Small Area Health Insurance Estimates program provides health insurance coverage estimates for states and counties from statistical model-based methods using survey, decennial census, and administrative data sources.

While administrative data have been incorporated into a number of important Census Bureau programs, it has not yet been highly utilized in decennial census operations. Research conducted utilizing Census 2000 results, this report, other 2010 Census Program for Evaluations and Experiments reports, and 2020 Census research will help determine the feasibility of using administrative data in decennial census operations.

### 2.2 Previous Household Administrative Records Research

In response to calls from external researchers and the National Academies of Science, the Census Bureau developed StARS 1999 to research the use of administrative data in decennial census operations. StARS 1999 was assembled from six administrative records sources: (1) Internal Revenue Service (IRS) Individual Income Returns, (2) IRS Information Returns, (3) Department of Housing and Urban Development (HUD) Tenant Rental Assistance Certification System (TRACS), (4) Center for Medicare and Medicaid Services (CMS) Medicare Enrollment Database (MEDB), (5) Indian Health Service (IHS) Patient Registration System, and (6) Selective Service System (SSS) Registration System (Farber and Leggieri 2002). In StARS 2000, and for subsequent years, an additional source file was added, (7) the HUD Public and Indian Housing Information Center (PIC) file.

The StARS 1999 data were assembled to test the feasibility of acquiring, validating, and unduplicating federal administrative data. The resulting files were primarily used for count comparisons relative to Census 2000 and in a Census 2000 field test called the Administrative Records Census Experiment or AREX 2000. StARS 1999 research found that address and person counts in StARS were relatively close to the counts in Census 2000 at the national level. StARS 1999 also produced counts that were similar to Census 2000 in states in the Midwest and Northeast, but there were more discrepancies with counts in the South and Southwest. Farber and Leggieri (2002) concluded that more research needed to be conducted to produce better race and ethnicity counts.

AREX 2000 investigated the possibilities of conducting an administrative records census and of using administrative records in support of a traditional census (Berning 2003). Census 2000 results for two Maryland and three Colorado counties were compared to administrative data from
StARS 1999. Nearly a one-year lag existed between the reference period of Census 2000 and several of the administrative data sources.

Count coverage of administrative data across the test counties varied according to the methodology that was used. The study also identified fewer children and more elderly people than Census 2000. Difficulties were also identified in determining the correct residence for movers. The lag between the various administrative records data reference periods and Census Day, April 1, 2000, likely contributed to these difficulties (Bye and Judson 2003).

The research on StARS 1999 and AREX 2000 provided important insights regarding the use of administrative records for decennial census operations. The 2010 Census Match Study extends the administrative records research by utilizing four additional federal files and nine commercial datasets, in addition to the data used to construct StARS. The 2010 Census Match Study also utilizes data that were close to an April 1, 2010 reference date.

3. Methodology

3.1 Data

The following sections briefly describe the federal and commercial data that were utilized in this report.

3.1.1 Federal Data from Other Agencies

Two files were used from the IRS, the Individual Income Tax Returns 1040 and Information Returns 1099. Individual Income Tax Returns provide data for individuals who file a 1040 tax return. These data include all returns received by the IRS and include the mailing address on the return (generally as of around April 15, 2010), the name and Taxpayer Identification Number (TIN) for the primary filer, and the name and TIN for any spouse and/or up to four dependents on the form. Information Returns 1099 include name, address, and TIN for individuals as reported to the IRS by financial institutions and employers on the various Information Returns (1099 forms, W2 forms, etc.).

Three files were used from HUD. The PIC data are maintained by HUD for persons participating in the public housing program and other rental assistance programs. TRACS contains data for persons receiving rental assistance and participating in other assisted housing programs through HUD. Computerized Homes Underwriting Management System (CHUMS) contains data for persons who have obtained or applied for mortgages insured under HUD/Federal Housing Administration mortgage insurance programs. These files include information such as name, address, date of birth or age, sex, race, Hispanic origin, and Social Security Number (SSN).
The 2010 Social Security Administration (SSA) Supplemental Security Record (SSR) file includes address, personal identifiers, and date of birth for Supplementary Security Income (SSI) recipients. The 2010 Census Match Study primarily used 2010 SSR files for SSI recipients and appended information on children and spouses from a separate 2011 SSR file.

The MEDB from the CMS contains Medicare enrollee data and name, address, date of birth, race, Hispanic origin, sex, and SSN. The SSS Registration File contains address and date of birth information on males, ages 18 to 25, who register with Selective Services for the purpose of creating a database which would be used in the event of a draft.

The IHS Patient Registration File contains information on American Indians or Alaska Natives (AIAN) who participate in the IHS System. Spouses and children of AIANs that are not in this race group are eligible to receive these services as well.

The National Change of Address file is maintained by the U.S. Postal Service and includes name, address, and move information such as the move date, the original address, and the new address.

Temporary Assistance for Needy Families (TANF) files include national level data for adults and children who participate or receive benefits through states’ TANF programs. These files include SSN, date of birth, sex, race, Hispanic origin, and basic geographic information (state, county, and zip code). Since addresses were not included in this file, TANF is only used for the person and demographic quality and coverage sections of this report.

The Death Master File from SSA was not used in the quality and coverage analysis of administrative records relative to the 2010 Census, but assisted in processing the administrative files. It contains date of death and SSN for deaths that have been reported to SSA. Date of death information was used to help determine whether a person in administrative records was alive as of April 1, 2010.

### 3.1.2 2010 Census Data

The Census Edited File was used for this report. This file includes the same address and person data from the Census Unedited File along with edited demographic variables and edit and imputation flags.

### 3.1.3 Commercial Data

Nine data files containing identifying information and demographic characteristics were acquired from five commercial data vendors for the 2010 Census Match Study evaluation. These data are described below.\(^5\)

\(^5\) Commercial data vendors are described by name in the Methodology section of this report, but all results in the Address, Person, and Person-Address sections reflect aggregated and unduplicated commercial data. License agreements with each vendor prohibit direct comparisons across companies. In the Demographic Quality and Coverage Assessment section, information about individual vendors is presented but vendor names are withheld.
The Census Bureau obtained multiple datasets from three vendors, Experian, Targus, and the Veteran Service Group of Illinois (VSGI). The Experian In-Source (INS) file contains current address, name, race, Hispanic origin, age, and sex data from credit bureau header information. The Experian End-Dated Records (EDR) file is a historical file that contains the same variables as Experian INS. The Targus Federal Consumer file contains address, name, race, Hispanic origin, age, and sex data. The Targus Pure Wireless file contains name, age, sex, and some address data. The Targus National Address File (NAF) contains addresses.

The VSGI Name and Address Resource Consumer (NAR) file contains current address, name, date of birth, race, Hispanic origin, and sex information from magazine/periodical change of address information, utility records, and other sources. The VSGI TrackerPlus (TRK) file is a historical file that contains the same variables as VSGI NAR. The VSGI race and Hispanic origin data were not used in this report, as they were at the tract level rather than at the individual level, thus quality and coverage of individual race and Hispanic origin data could not be assessed from this data source.

The InfoUSA file contains current and historical address, name, race, Hispanic origin, age, and sex data from sources such as property taxes, voter registration rolls, and telephone book white pages. The Melissa Data Base Source (Melissa) file contains address, name, and age information from credit header records, utility bills, cellular phone records, and the U.S. Postal Service.

3.1.4 Description of Data Utilized in Address, Person, and Person-Address Pairs Results Sections

All the federal and commercial data except for TANF and the Targus NAF were used in the address, person, and person-address pair result sections of this report. TANF data could not be used for the address or person-address pair evaluation as TANF did not include addresses on the file. The Targus NAF was not used for the person and person-address pair sections as the file does not contain person data.

3.1.5 Description of Data Utilized in Demographic Quality and Coverage Results Section

The demographic quality and coverage analysis used select files that contained race, Hispanic origin, age, and sex data. For race, all three HUD files, IHS, MEDB, TANF, Experian EDR, Experian INS, InfoUSA, and Targus Federal Consumer were used. The Hispanic origin analysis used all of the same files that were used for race except IHS. The sex analysis included all the files used in the race analysis plus SSS, Targus Wireless, VSGI NAR, and VSGI TRK. The age analysis included all the same files as the sex analysis plus SSR and Melissa data. In addition to these files, for all demographics, previous census records (Census 2000 and ACS 2001 to ACS 2009) and the SSA Numerical Identification File (Numident) were also evaluated. The Numident includes SSN, name, date of birth, sex, and race data for all persons who have been
assigned a SSN by the SSA. It does not include address or location information associated with records on the file, and as such it was not used in the address, person, or person-address pair results sections of this report.

The federal and commercial data do not uniformly collect and report data on Hispanic origin and race. Regarding the Numident, the SSA collected race data from 1936 to 1980 via the Social Security application based on the three categories of “White,” “Black,” and “Other.” In 1980, SSA changed its categories to “White,” “Black,” “Hispanic,” “Asian, Asian American, or Pacific Islander,” and “American Indian or Alaskan Native” in order to comply with the 1977 Office of Management and Budget (OMB) Directive 15 on Race and Ethnic Standards. The SSA then halted collecting race data when it transitioned to the Enumeration at Birth system in 1987.

The remaining federal files report race according to the OMB revised 1997 race and ethnic standards. However, unlike the Census Bureau, HUD CHUMS, HUD PIC, and TANF do not include a category for Some Other Race (SOR). While it does include this category, MEDB models its race data and does not include a category for Two or More Races. IHS differs in that it only identifies persons as AIAN and non-AIAN. The commercial files model race data and do not model more than one race for an individual.

3.2 Record Linkage

The same people and addresses are present in many of the same administrative records data sources. The administrative records files must be unduplicated in order to evaluate them relative

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6 When collecting and tabulating data on race and ethnicity, federal agencies must adhere to guidance from the U.S. Office of Management and Budget’s (OMB) 1997 Revisions to the Standards for the Classification of Federal Data on Race and Ethnicity. The standards are available online at <www.whitehouse.gov/omb/fedreg/1997standards.html>.

OMB requires federal agencies to use a minimum of two ethnicities: Hispanic or Latino and Not Hispanic or Latino. Hispanic origin can be viewed as the heritage, nationality group, lineage, or country of birth of the person or the person’s parents or ancestors before their arrival in the United States. People who identify their origin as Hispanic, Latino, or Spanish may be any race. “Hispanic or Latino” refers to a person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin regardless of race.

OMB requires federal agencies to use a minimum of five race categories: White, Black or African American, American Indian or Alaska Native, Asian, and Native Hawaiian or Other Pacific Islander. For respondents unable to identify with any of these five race categories, OMB approved the Census Bureau’s inclusion of a sixth category, Some Other Race. The 1997 standards require federal agencies to permit respondents to self-identify with more than one race. For more information on how race was collected and tabulated in the 2010 Census please refer to Humes, K., N. Jones, and R. Ramirez. 2011. Overview of Race and Hispanic Origin: 2010, U.S. Census Bureau, 2010 Census Briefs, C2010BR-02, available at <www.census.gov/prod/cen2010/briefs /c2010br-02.pdf>.

7 Individuals who responded to the question on race by indicating only one race are referred to as the race-alone population or the group that reported only one race category. Six categories make up this population: White alone, Black or African American alone, American Indian or Alaska Native alone, Asian alone, Native Hawaiian or Other Pacific Islander alone, and Some Other Race alone. Individuals who chose more than one of the six race categories are referred to as the Two or More Races population. All respondents who indicated more than one race can be collapsed into the Two or More Races category which, combined with the six race-alone categories, yields seven mutually exclusive and exhaustive categories. Thus, the six race-alone categories and the Two or More Races category sum to the total population.
to the 2010 Census.\(^8\) Thus, unique address identifiers called master address file identification numbers (MAFIDs) and person identifiers called protected identification keys (PIKs) were assigned to administrative records through the Person Identification Validation System (PVS). To match administrative records data to the 2010 Census, MAFIDs and PIKs must be on these data sources. The 2010 Census data already had MAFIDs, therefore only PIKs were assigned to the 2010 Census through PVS. For more information on this record linkage system see Wagner and Layne (2012).

The process of assigning address identifiers starts with matching administrative data to an extract from the Census Bureau Master Address File (MAF).\(^9\) MAFIDs were assigned to administrative records with address data that matched to the MAF. The process of assigning PIKs to the 2010 Census and administrative data starts with matching these data to a reference file containing data on individuals.

For the assignment of PIKs, the matching software compared personally identifiable information (PII) from administrative data and the 2010 Census to PII on person reference files. The software has two primary components, and one or both of those components can be utilized depending on the characteristics available in the administrative records and 2010 Census files. The two components are “verification” and “search.” The verification module was used when the source file contained a SSN.\(^{10}\)

Many federal administrative files contained SSNs, but the 2010 Census and most commercial data did not include SSNs. For these data sets, the search modules in the software compared name, address, and date of birth fields to the person reference file. Administrative and 2010 Census records that matched to the person reference file through either the “verification” or “search” modules were considered validated and were assigned a PIK.

### 3.3 Count and Match Ratios

Count and match ratios are used to evaluate the quality and coverage of administrative data relative to the 2010 Census. The count ratio is calculated by dividing the unduplicated administrative records count by the 2010 Census count and multiplying the result by 100. When the administrative records data have the same proportion of addresses, persons, or person-address

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\(^8\) The 2010 Census also contains duplicates. Preliminary research that unduplicated the 2010 Census by PIK suggests there were 10.5 million duplicates in the 2010 Census. This is close to the official Census Coverage Measurement figures which suggest there were 8.5 million duplicates in the 2010 Census (Mule 2012). The 2010 Census Match Study report only uses the unduplicated 2010 Census for one analysis, the demographics quality analysis. Duplicates may vary by demographic group, potentially inflating quality of data for some groups while deflating quality for others. Thus, 2010 Census duplicate PIKs were removed from the demographics quality analysis.

\(^9\) The 2010 Census Match Study uses a Master Address File extract. For the purposes of the report, this will be referred to as the MAF. The extract used in this analysis may differ from the full Master Address File.

\(^{10}\) A small number of Individual Tax Identification Numbers (ITINs) were in the reference file when a PIK was assigned to 2010 Census persons. Additionally, ITINs were in the reference file when a PIK was assigned to some of the administrative data sources.
pairs as the 2010 Census, then the count ratio is 100 percent. Count ratios above 100 percent indicate a higher count in administrative records, while a ratio below 100 percent indicates a lower count in administrative records. Count ratios closer to 100 percent indicate better administrative data whereas very low and very high count ratios indicate lower quality administrative data.

The match ratio is calculated by dividing the count of 2010 Census records that match to administrative records by the 2010 Census count and multiplying the result by 100. The match ratio represents the percentage of 2010 Census addresses, persons, person-address pairs, and demographic characteristics that match to administrative records by MAFID, PIK, and PIK-MAFID, respectively.

3.4 Best Address for Person-Address Pairs

Administrative data sometimes have conflicting information regarding person-address pairs. For instance, one data source could have a person living at an address in Maryland, while another data source may have the same person living in Texas. To compare administrative records to the 2010 Census, a best address was chosen for persons with multiple addresses in administrative records.

A logistic model was utilized to select the best address for a person-address pair. For each administrative records source, the model estimated whether a particular administrative record address is the same as the 2010 Census address for each person found in both the 2010 Census and administrative records. The independent variables were 2010 Census demographic characteristics and proximity of an administrative record to April 1, 2010. Predicted values were obtained from each regression. For each person, the address associated with the highest predicted probability of having the same administrative records and 2010 Census address was selected. When demographic characteristics for a person were unavailable, the address was selected from the source with the highest overall address match rate with the 2010 Census.

There are persons at multiple addresses in the 2010 Census as well (when the same PIK appears at multiple MAFIDs), but for the person-address section these possible duplicates were kept in the 2010 Census universe.11

4. Limitations

The 2010 Census Match Study included validated addresses and persons. Records lacking complete or quality data to match to the MAF or the person reference file were omitted from most analyses. The person reference file was based on the SSA Numident file which primarily includes persons with a SSN.

11 The 2010 Census duplicates were retained in the count and match analyses pending further analysis on whether the pairs were true duplicates or error resulting from the probabilistic matching in the PIK assignment process.
One of the goals of the 2010 Census Match Study was to evaluate all items on the 2010 Census, including tenure and relationship to the household. The administrative records data used in this study did not have tenure or relationship information on the files. Future research should evaluate how previous census records compare to the 2010 Census tenure and relationship data.

The majority of the federal and commercial data do not include group quarters, while the 2010 Census has housing units and group quarters. This report does not distinguish between those who live in group quarters and those who live in housing units in the 2010 Census.

5. Results

5.1 Address Count and Match

Nation

Figure 1 displays the number of addresses in the 2010 Census and administrative records. As discussed in the methodology section, MAFIDs are unique identifiers for addresses. For this report, MAFIDs facilitated address record linkage between the 2010 Census and administrative records.

There were 131.7 million occupied or vacant addresses in the 2010 Census, all of which had MAFIDs. There were 500.9 million addresses in the administrative records files. Of these, there were 151.3 million addresses that had a unique MAFID and 349.6 million addresses that did not have a MAFID. Future research will investigate unduplicating and assigning MAFIDs to administrative records addresses that do not have a MAFID.

Of the 131.7 million 2010 Census addresses, 122.0 million (92.6 percent) matched to administrative records addresses with MAFIDs. There were 29.3 million administrative records addresses with MAFIDs that were not in the 2010 Census and 9.7 million addresses that were in the 2010 Census, but not in administrative records.

There are several factors that impact the 2010 Census and administrative records address counts and matches. The 2010 Census addresses were physical locations, whereas administrative record data represented mailing addresses. For instance, there were Post Office (P.O.) Box addresses in administrative data, while the 2010 Census did not include P.O. Box addresses. Also, the 2010 Census included physical descriptions of addresses such as “yellow house near fork in the road,” which cannot be matched to administrative data. In addition, some of the commercial data utilized in this report included current and historical addresses, thus potentially containing old addresses that did not exist in April 2010.
The commercial data also included non-residential addresses. Preliminary research suggests that of the 29.3 million addresses in administrative records that were not in the 2010 Census, approximately 10.1 million may have been non-residential addresses (Schellhamer 2012). The administrative records data also could have contained addresses that were unknown to the Census Bureau such as new construction. These factors that contribute to the count and match differentials between the 2010 Census and administrative records will be examined further, contributing to research for the 2020 Census.

These results compare addresses with MAFIDs in administrative records to MAFIDs deemed “good census addresses” through 2010 Census operations. Additional research is required to
determine whether the universe of administrative records addresses could have been further refined.

**Region**

Table 1 shows the count and match results comparing the 2010 Census addresses to administrative records addresses by region.\(^{12}\)

**Table 1. 2010 Census and Administrative Records Address Count and Match Numbers and Ratios by Region**

<table>
<thead>
<tr>
<th>Region</th>
<th>2010 Census Address Count</th>
<th>Administrative Records Address Count</th>
<th>2010 Census and Administrative Records Address Match</th>
<th>2010 Census and Administrative Records Address Count Ratio</th>
<th>2010 Census and Administrative Records Address Match Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total</td>
<td>131,704,730</td>
<td>151,277,043</td>
<td>121,967,283</td>
<td>114.9</td>
<td>92.6</td>
</tr>
<tr>
<td>Northeast</td>
<td>23,647,636</td>
<td>26,090,251</td>
<td>21,410,938</td>
<td>110.3</td>
<td>90.5</td>
</tr>
<tr>
<td>Midwest</td>
<td>29,483,646</td>
<td>33,826,863</td>
<td>27,851,765</td>
<td>114.7</td>
<td>94.5</td>
</tr>
<tr>
<td>South</td>
<td>49,980,829</td>
<td>59,002,109</td>
<td>46,166,891</td>
<td>118.0</td>
<td>92.4</td>
</tr>
<tr>
<td>West</td>
<td>28,592,619</td>
<td>32,357,820</td>
<td>26,537,689</td>
<td>113.2</td>
<td>92.8</td>
</tr>
</tbody>
</table>

Sources: 2010 Census and 2010 Census Match Study Administrative Records Data.

As discussed above, there were 131.7 million addresses in the 2010 Census and 151.3 million addresses in administrative records that received a MAFID, resulting in 19.6 million more addresses in administrative records relative to the 2010 Census. The address count ratio for the total population was 114.9 percent, mirroring the counts, which indicated a larger number of administrative records addresses relative to the 2010 Census.

All regions had count ratios above 110.0 percent.\(^{13}\) The South had the highest count ratio at 118.0 percent. In the South, there were 50.0 million addresses in the 2010 Census and 59.0 million in administrative records. The Midwest had the second highest count ratio (114.7 percent), where the 2010 Census count was 29.5 million and the administrative records count was 33.8 million. The count ratio for the West was 113.2 percent, and the Northeast had the lowest count ratio at 110.3 percent.

\(^{12}\) Geographic variables in 2010 Census data were used to tabulate region, state, and county tables and figures throughout this report.

\(^{13}\) The Northeast census region includes Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Pennsylvania, Rhode Island, and Vermont. The Midwest census region includes Illinois, Indiana, Iowa, Kansas, Michigan, Minnesota, Missouri, Nebraska, North Dakota, Ohio, South Dakota, and Wisconsin. The South census region includes Alabama, Arkansas, Delaware, the District of Columbia, Florida, Georgia, Kentucky, Louisiana, Maryland, Mississippi, North Carolina, Oklahoma, South Carolina, Tennessee, Texas, Virginia, and West Virginia. The West census region includes Alaska, Arizona, California, Colorado, Hawaii, Idaho, Montana, Nevada, New Mexico, Oregon, Utah, Washington, and Wyoming.
As discussed above, the address match ratio for the total population was 92.6 percent, and all regions had a match ratio above 90.0 percent. The Midwest had the highest match ratio at 94.5 percent. Of the 29.5 million addresses in the Midwest in the 2010 Census, administrative records matched to 27.9 million. The West had the second highest match ratio (92.8 percent), followed by the South (92.4 percent). The Northeast had the lowest match ratio (90.5 percent). As demonstrated by the regional pattern of count and match ratios for addresses, these ratios do not necessarily correspond to each other. The Northeast had the lowest count and match ratios of all regions, while the South had the highest count ratio, but the second lowest match ratio.

State

Table 2 shows count ratios, match ratios, and the distribution of Type of Enumeration Area (TEA) for the ten states that have the lowest and highest count and match ratios (see Appendix 1 for 2010 Census and administrative records address count and match numbers and ratios for all states).

The state-level address count ratio ranged from 92.7 percent to 124.0 percent. Consistent with the finding that the South had the highest address count ratio relative to the other regions, many of the states with the highest count ratios are located in the South. Mississippi had the highest count ratio (124.0 percent), followed by Delaware (122.7 percent), Georgia (121.8 percent), Alabama (121.1 percent), and Louisiana (120.3 percent). All of these states are located in the South and of the ten states that had the highest count ratios, Iowa was the only one not in the South.

The state with the lowest count ratio was Alaska at 92.7 percent. This was the only state where the count ratio was below 100.0 percent. After Alaska, West Virginia (103.9 percent), Vermont (106.8 percent), Maine (106.8 percent), and New York (107.0 percent) had the next lowest state count ratios. Of the ten states that had the lowest count ratios, five were in the Northeast, four were in the West, and one was in the South. This is consistent with the regional patterns observed for count ratios, where the West and Northeast had lower count ratios relative to the South and Midwest.
Table 2. 2010 Census and Administrative Records Address Count Ratio, Match Ratio, and Type of Enumeration Area for the Ten States with the Lowest and Highest Ratios

<table>
<thead>
<tr>
<th>State</th>
<th>Ratio</th>
<th>Mailout / Mailback</th>
<th>Military</th>
<th>Remote Alaska</th>
<th>Remote Update Enumerate</th>
<th>Update Enumerate</th>
<th>Update / Leave</th>
<th>Urban Update / Leave</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Lowest Count Ratios</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Alaska</td>
<td>92.7</td>
<td>63.2</td>
<td>2.3</td>
<td>9.3</td>
<td>1.3</td>
<td>0.0</td>
<td>23.9</td>
<td>0.0</td>
</tr>
<tr>
<td>West Virginia</td>
<td>103.9</td>
<td>54.9</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>45.1</td>
<td>0.0</td>
</tr>
<tr>
<td>Vermont</td>
<td>106.8</td>
<td>66.5</td>
<td>0.0</td>
<td>0.0</td>
<td>6.4</td>
<td>27.1</td>
<td>0.0</td>
<td></td>
</tr>
<tr>
<td>Maine</td>
<td>106.8</td>
<td>66.4</td>
<td>0.1</td>
<td>0.0</td>
<td>0.4</td>
<td>2.2</td>
<td>30.9</td>
<td>0.0</td>
</tr>
<tr>
<td>New York</td>
<td>107.0</td>
<td>93.9</td>
<td>0.1</td>
<td>0.0</td>
<td>0.0</td>
<td>1.9</td>
<td>4.1</td>
<td>0.0</td>
</tr>
<tr>
<td>Wyoming</td>
<td>107.8</td>
<td>51.4</td>
<td>0.4</td>
<td>0.0</td>
<td>0.0</td>
<td>4.0</td>
<td>44.2</td>
<td>0.0</td>
</tr>
<tr>
<td>New Mexico</td>
<td>108.0</td>
<td>66.6</td>
<td>0.4</td>
<td>0.0</td>
<td>0.0</td>
<td>6.4</td>
<td>26.5</td>
<td>0.0</td>
</tr>
<tr>
<td>Montana</td>
<td>108.3</td>
<td>40.6</td>
<td>0.2</td>
<td>0.0</td>
<td>0.0</td>
<td>6.3</td>
<td>52.9</td>
<td>0.0</td>
</tr>
<tr>
<td>New Hampshire</td>
<td>110.0</td>
<td>77.3</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>4.6</td>
<td>18.1</td>
<td>0.0</td>
</tr>
<tr>
<td>Rhode Island</td>
<td>110.0</td>
<td>98.3</td>
<td>0.3</td>
<td>0.0</td>
<td>0.0</td>
<td>0.4</td>
<td>1.0</td>
<td>0.0</td>
</tr>
<tr>
<td><strong>Highest Count Ratios</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mississippi</td>
<td>124.0</td>
<td>79.4</td>
<td>0.2</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>1.5</td>
<td>18.9</td>
</tr>
<tr>
<td>Delaware</td>
<td>122.7</td>
<td>89.4</td>
<td>0.4</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
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<td>Georgia</td>
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<td>93.8</td>
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<td>0.0</td>
<td>0.0</td>
<td>0.4</td>
<td>5.6</td>
</tr>
<tr>
<td>Alabama</td>
<td>121.1</td>
<td>88.4</td>
<td>0.1</td>
<td>0.0</td>
<td>0.0</td>
<td>1.2</td>
<td>0.3</td>
<td>9.9</td>
</tr>
<tr>
<td>Louisiana</td>
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<td>68.9</td>
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<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>1.3</td>
<td>29.5</td>
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<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>33.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Tennessee</td>
<td>118.6</td>
<td>99.6</td>
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<td>0.0</td>
<td>0.0</td>
<td>0.3</td>
<td>0.0</td>
<td>0.1</td>
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<td>22.5</td>
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<td>118.3</td>
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<td>1.7</td>
<td>0.1</td>
<td>1.6</td>
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<tr>
<td><strong>Lowest Match Ratios</strong></td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
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<td>70.5</td>
<td>63.2</td>
<td>2.3</td>
<td>9.3</td>
<td>1.3</td>
<td>0.0</td>
<td>23.9</td>
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<td>0.0</td>
<td>45.1</td>
<td>0.0</td>
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<td>Vermont</td>
<td>79.9</td>
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<td>0.0</td>
<td>0.0</td>
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<td>27.1</td>
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<td>0.0</td>
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<td>2.2</td>
<td>30.9</td>
<td>0.0</td>
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<td>Montana</td>
<td>81.1</td>
<td>40.6</td>
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<td>0.0</td>
<td>0.0</td>
<td>6.3</td>
<td>52.9</td>
<td>0.0</td>
</tr>
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<td>New Mexico</td>
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<td>Wyoming</td>
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<td>Hawaii</td>
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<td>69.9</td>
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<td>0.0</td>
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<td>New Hampshire</td>
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<td>0.0</td>
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<td>4.6</td>
<td>18.1</td>
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<tr>
<td>Idaho</td>
<td>87.8</td>
<td>82.6</td>
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<td>0.0</td>
<td>3.1</td>
<td>14.1</td>
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<tr>
<td><strong>Highest Match Ratios</strong></td>
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<td>22.5</td>
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<tr>
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<td>99.7</td>
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<td>0.0</td>
<td>0.0</td>
<td>1.4</td>
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<tr>
<td>Maryland</td>
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<td>98.4</td>
<td>0.3</td>
<td>0.0</td>
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<td>5.0</td>
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<td>18.4</td>
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<td>99.3</td>
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<td>96.6</td>
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<td>0.1</td>
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<td>77.1</td>
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<td>0.0</td>
<td>0.4</td>
<td>22.3</td>
<td>0.0</td>
</tr>
</tbody>
</table>

Sources: 2010 Census and 2010 Census Match Study Administrative Records Data.
The state address match ratio range was 70.5 percent to 96.5 percent. The five states with the highest match ratios were in the Midwest and South. Iowa had the highest address match ratio at 96.5 percent. Ohio had the second highest match (96.1 percent), followed by the District of Columbia (96.1 percent), Maryland (95.8 percent), and Indiana (95.7 percent). Of the ten states that had the highest match ratios, five were in the Midwest, three in the South, and one each in the Northeast and West. Alaska (70.5 percent) had the lowest percent of addresses that matched between the 2010 Census and administrative records with MAFIDs. The following four states had the next lowest match ratios: West Virginia (72.8 percent), Vermont (79.9 percent), Maine (80.5 percent), and Montana (81.1 percent). Of the ten states with the lowest match ratios, six were in the West, three in the Northeast, and one in the South.

Future research will identify reasons behind geographic differences in count and match ratios. For instance, 2010 Census and administrative records address counts and matches may be in part affected by differences in city-style and rural route addresses, where city-style addresses are easier to match. TEA can be used as an indicator of city-style addresses as compared to incomplete or rural route addresses, as Mailout/Mailback TEAs tend to have more city-style addresses relative to other TEAs such as Update/Leave and Update Enumerate. Looking at the ten states in Table 2 with the lowest and highest count and match ratios by TEA, many of the states with the lowest count and match ratios had lower proportions of addresses designated as the Mailout/Mailback TEA relative to states with the highest count and match ratios.

**County**

Figure 2 shows address count ratios for the 2010 Census and administrative records by county. Green indicates counties with a count ratio that is closer to 100.0 percent, yellow and orange indicate low count ratios, and blue and purple represent high count ratios.

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14 For this report, the District of Columbia is treated as a state equivalent.
15 The Census Bureau assigns a Type of Enumeration Area (TEA) value to collection blocks to assist with planning census operations for the decennial censuses. For instance, areas that have confirmed mail delivery by the U.S. Postal Service and good response rates to data collection efforts are generally assigned to a Mailout/Mailback TEA (Johanson et al. 2011). Mailout/Mailback is a data collection where forms are mailed to housing units and respondents are asked to complete their form and return by mail. Other TEAs include Update/Leave, Remote Update Enumerate, Remote Alaska, Update Enumerate, Military, and Urban Update/Leave. Update/Leave is a form of data collection where enumerators deliver questionnaires to housing units in their assignment areas and respondents are asked to complete their forms and return by mail. In Remote Update Enumerate, enumerators enumerate households; this is done in rural areas that may require special travel. Remote Alaska is a data collection method in isolated parts of Alaska where an enumerator enumerates the household. Update Enumerate is a data collection method for communities that have special needs, where an enumerator collects data from the household. Military represents areas that have military installations. Mailout/Mailback is conducted in these areas. Urban Update/Leave is a data collection method conducted in areas that have city-style addresses, but may not have good mail delivery. Enumerators leave questionnaires at housing units in their assignment areas and respondents are asked to complete and return the forms by mail. For more information on TEA delineation and definitions for the 2010 Census see Johanson et al. 2011.
Consistent with regional and state descriptive statistics, many counties in states in the South and Midwest had count ratios above 110.0 percent, indicating that administrative records had a higher number of addresses in these counties relative to the 2010 Census. In the Midwest, states or areas with a number of counties with low count ratios included North Dakota, South Dakota, northern Minnesota, northern Wisconsin, and northern Michigan. In the South, West Virginia and Texas had a number of counties with low count ratios. The West had many counties with low count ratios. For instance, many counties in Alaska, Montana, and New Mexico had low count ratios.

Table 3 shows count ratios (upper panel), match ratios (lower panel), and TEA for selected counties.
Table 3. 2010 Census and Administrative Records Address Count Ratio, Match Ratio, and Type of Enumeration Area for the Ten Counties with the Lowest and Highest Ratios

<table>
<thead>
<tr>
<th>County</th>
<th>Ratio</th>
<th>Type of Enumeration Area</th>
<th>Mailout / Mailback</th>
<th>Military</th>
<th>Remote Alaska</th>
<th>Remote Update Enumerate</th>
<th>Update Enumerate</th>
<th>Update / Leave</th>
<th>Urban Update / Leave</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lowest Count Ratios</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Denali, Alaska</td>
<td>12.1</td>
<td></td>
<td>0.0</td>
<td>0.2</td>
<td>22.8</td>
<td>0.0</td>
<td>0.0</td>
<td>77.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Yukon-Koyukuk, Alaska</td>
<td>12.1</td>
<td></td>
<td>0.0</td>
<td>0.0</td>
<td>100.0</td>
<td>0.0</td>
<td>0.0</td>
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<td>0.0</td>
</tr>
<tr>
<td>Aleutians East, Alaska</td>
<td>14.7</td>
<td></td>
<td>0.0</td>
<td>0.0</td>
<td>50.2</td>
<td>0.0</td>
<td>0.0</td>
<td>49.8</td>
<td>0.0</td>
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<td>Hoonah-Angoon, Alaska</td>
<td>15.5</td>
<td></td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>21.2</td>
<td>0.0</td>
<td>78.8</td>
<td>0.0</td>
</tr>
<tr>
<td>Kalawao, Hawaii</td>
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<td>0.0</td>
<td>0.0</td>
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<td></td>
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<td>14.9</td>
<td>0.0</td>
<td>0.0</td>
<td>85.1</td>
<td>0.0</td>
</tr>
<tr>
<td>Northwest Arctic, Alaska</td>
<td>18.4</td>
<td></td>
<td>0.0</td>
<td>0.0</td>
<td>57.1</td>
<td>0.0</td>
<td>0.0</td>
<td>42.9</td>
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<tr>
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<tr>
<td>Los Alamos, New Mexico</td>
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</tr>
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<td>Fairfax, Virginia</td>
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</tr>
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<td>0.0</td>
<td>0.0</td>
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<td>0.0</td>
</tr>
</tbody>
</table>

Sources: 2010 Census and 2010 Census Match Study Administrative Records Data.
The count ratio range across counties was 12.1 percent to 208.2 percent. Of the ten counties with the lowest count ratios, eight were in Alaska—Denali (12.1 percent), Yukon-Koyukuk (12.1 percent), Aleutians East (14.7 percent), Hoonah-Angoon (15.5 percent), Yakutat (16.0 percent), Northwest Arctic (18.4 percent), Dillingham (20.2 percent), and Bethel (21.2 percent). Kalawao, Hawaii (15.9 percent) and Kenedy, Texas (19.7 percent) were also among the ten counties with the lowest count ratios.

The ten counties that had the highest count ratios were mainly in the South, many of them in Georgia—Chattahoochee (208.2 percent), Stephens (207.2 percent), Warren (180.6 percent), Bleckley (170.5 percent), and Pike (169.7 percent). Two counties were in Tennessee—Clay (177.0 percent) and Houston (176.5 percent). St. Bernard, Louisiana (183.9 percent) was also among the ten counties with the highest count ratios. Two counties in the Midwest, Kiowa, Kansas (201.4 percent) and Hayes, Nebraska (185.3 percent) were also among the top ten.

Figure 3 shows address match ratios by county. Purple and blue represent counties with high match ratios, while yellow and orange represent low match ratios.
A number of states in the Midwest had counties with high match ratios. The majority of counties in Iowa, Illinois, Indiana, and Ohio had match ratios that were 90.0 percent or above. Many counties in southern Minnesota, Wisconsin, and Michigan also had match ratios that were 90.0 percent or above. In the Northeast, New Jersey, southeast Pennsylvania, Connecticut, Rhode Island and Massachusetts had a number of counties with high match ratios.

Across the United States, counties near metropolitan areas tended to have high match ratios. For instance, in the West, counties near Los Angeles, California; San Francisco, California; Portland, Oregon; Seattle, Washington; and Denver, Colorado had high match ratios. In the South, counties near Houston, Texas; Austin, Texas; Little Rock, Arkansas; Birmingham, Alabama; Montgomery, Alabama; and Atlanta, Georgia had high match ratios. Many counties in western states, such as Alaska, Idaho, Montana, and New Mexico had a number of counties with low match ratios. West Virginia in the South was another state that had many counties with low match ratios.

Address match ratios for counties ranged from 8.0 percent to 99.5 percent (Table 3, bottom panel). Similar to the address count ratios for counties, eight of the ten counties with the lowest match ratios were in Alaska—Denali (8.0 percent), Yukon-Koyukuk (9.1 percent), Aleutians East (12.2 percent), Aleutians West (12.8 percent), Yakutat (12.9 percent), Dillingham (13.9 percent), Haines (14.5 percent), and Northwest Arctic (14.9 percent). Shannon, South Dakota (13.7 percent) and Kalawao, Hawaii (12.4 percent) were also among the ten counties with the lowest match ratios.

The ten counties with the highest match ratios were located in the South, Midwest and West. Six counties from Virginia were within the ten counties with the highest match ratios, Manassas Park (99.5 percent), Alexandria (99.1 percent), Manassas (98.9 percent), Radford (98.7 percent), Hampton (98.7 percent), and Fairfax (98.6 percent). Three counties in the Midwest were among the ten counties with the highest match ratios, St. Louis, Missouri (98.9 percent); Anoka, Minnesota (98.8 percent); and Minnehaha, South Dakota (98.6 percent). Los Alamos, New Mexico also had a high address match ratio (98.6 percent).

Similar to the state patterns, TEAs explain some of the count and match trends by county. Counties with the lowest count and match ratios did not have any addresses in the Mailout/Mailback TEA. Eight of the ten counties with the highest match ratios were entirely in the Mailout/Mailback TEA. At least 94.0 percent of the 2010 Census addresses in the other two counties with the highest match ratios were in Mailout/Mailback.

**Federal and Commercial Data**

Table 4 shows count and match ratios for the 2010 Census and federal and commercial data.
Table 4. 2010 Census and Federal and Commercial Administrative Records Address Count and Match Numbers and Ratios

<table>
<thead>
<tr>
<th>Data Type</th>
<th>Administrative Records Address Count</th>
<th>2010 Census and Administrative Records Address Match</th>
<th>2010 Census and Administrative Records Count Ratio</th>
<th>2010 Census and Administrative Records Address Match Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Commercial</td>
<td>145,635,096</td>
<td>119,035,878</td>
<td>110.6</td>
<td>90.4</td>
</tr>
<tr>
<td>Federal</td>
<td>122,680,039</td>
<td>110,914,836</td>
<td>93.1</td>
<td>84.2</td>
</tr>
<tr>
<td>In both Commercial and Federal</td>
<td>117,038,092</td>
<td>107,983,431</td>
<td>88.9</td>
<td>82.0</td>
</tr>
</tbody>
</table>

Sources: 2010 Census and 2010 Census Match Study Administrative Records Data.

There were more unduplicated addresses with MAFIDs in commercial data compared to both the 2010 Census and federal data. There were 145.6 million addresses in commercial data and 122.7 million addresses in federal data. There were 117.0 million addresses that were in both commercial and federal data. Thus, 28.6 million addresses were unique to commercial data, and 5.6 million addresses were unique to federal data.

The 2010 Census-commercial and 2010 Census-federal count ratios were 110.6 percent and 93.1 percent respectively. Commercial data not only had a higher 2010 Census address count ratio relative to federal data, they also had higher 2010 Census address match ratios. Of the 131.7 million addresses in the 2010 Census, commercial addresses matched to 119.0 million or 90.4 percent. Federal data matched to 110.9 million or 84.2 percent of the 2010 Census addresses.

**Type of Enumeration Area**

Table 5 shows TEA address count and match ratios for the 2010 Census and administrative records.16, 17

TEAs that were designated for Mailout/Mailback data collection methods, where forms were mailed to housing units and respondents were asked to complete and mail back their questionnaire, had the highest count and match ratios—Mailout/Mailback and Military TEAs. The Mailout/Mailback TEA had the second highest count ratio and highest match ratio at 114.1 percent and 94.6 percent respectively. The Military TEA had the highest count ratio and second highest match ratio at 200.5 percent and 92.8 percent respectively. These TEAs were designated for Mailout/Mailback data collection in part because they had confirmed mail delivery by the postal service and had fewer enumeration challenges (Johanson et al. 2011). These addresses were also mostly city-style addresses, which generally pose less of a matching issue relative to rural route addresses (Johanson et al. 2011).

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16 Note that counts for TEA differ from “2010 Census Operational Assessment for Type of Enumeration Area Delineation” (Johanson et al. 2011) as different data sets were used.

17 Not all administrative records addresses were assigned a TEA as these may include new construction that did not exist prior to address canvassing as well as non-residential addresses which are not assigned a TEA.
Table 5. 2010 Census and Administrative Records Address Count and Match Numbers and Ratios by Type of Enumeration Area

<table>
<thead>
<tr>
<th>Type of Enumeration Area</th>
<th>2010 Census Address Count</th>
<th>Administrative Records Address Count</th>
<th>2010 Census and Administrative Records Address Match</th>
<th>2010 Census and Administrative Records Address Count Ratio</th>
<th>2010 Census and Administrative Records Address Match Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total</td>
<td>131,704,730</td>
<td>151,277,043</td>
<td>121,967,283</td>
<td>114.9</td>
<td>92.6</td>
</tr>
<tr>
<td>Mailout/Mailback</td>
<td>119,713,726</td>
<td>136,634,851</td>
<td>113,204,798</td>
<td>114.1</td>
<td>94.6</td>
</tr>
<tr>
<td>Military</td>
<td>213,420</td>
<td>427,947</td>
<td>198,082</td>
<td>200.5</td>
<td>92.8</td>
</tr>
<tr>
<td>Remote Alaska</td>
<td>28,549</td>
<td>5,710</td>
<td>4,798</td>
<td>20.0</td>
<td>16.8</td>
</tr>
<tr>
<td>Remote Update Enumerate</td>
<td>6,896</td>
<td>2,481</td>
<td>1,898</td>
<td>36.0</td>
<td>27.5</td>
</tr>
<tr>
<td>Update Enumerate</td>
<td>1,366,883</td>
<td>1,149,847</td>
<td>875,505</td>
<td>84.1</td>
<td>64.1</td>
</tr>
<tr>
<td>Update/Leave</td>
<td>7,978,221</td>
<td>7,571,640</td>
<td>5,863,855</td>
<td>94.9</td>
<td>73.5</td>
</tr>
<tr>
<td>Urban Update/Leave</td>
<td>2,397,035</td>
<td>2,497,466</td>
<td>1,818,347</td>
<td>104.2</td>
<td>75.9</td>
</tr>
<tr>
<td>No TEA</td>
<td>0</td>
<td>2,987,101</td>
<td>0</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

Note: A “-” in tables in this report indicates a ratio where the denominator was 0.
Sources: 2010 Census and 2010 Census Match Study Administrative Records Data.

The Urban Update/Leave TEA had the next highest count and match ratios, but they were considerably lower than the Mailout/Mailback and Military count and match ratios. The count ratio was 104.2 percent, and the match ratio was 75.9 percent. These count and match ratios were likely lower for Urban Update/Leave relative to Mailout/Mailback and Military because this form of data collection was designated for areas where the Census Bureau believed that there were issues with accurate mail delivery (Johanson et al. 2011). For instance, this TEA included multi-unit buildings where mail was delivered at a drop point instead of individual units or communities that had city-style addresses, but where many residents had mail delivered to a P.O. Box, likely impacting the match ratios between the 2010 Census and administrative records. (Johanson et al. 2011).

The Update/Leave count ratio (94.9 percent) was lower than Urban Update/Leave, but this TEA had a similar match ratio (73.5 percent) to Urban Update/Leave. The Update Enumerate count and match ratios were 84.1 percent and 64.1 percent respectively. Update/Leave and Update Enumerate count and match ratios were likely lower than Mailout/Mailback and Military because Update/Leave was conducted in areas that typically do not have city-style addresses and in Update Enumerate many housing units may not have had a house number or street name, making these addresses difficult to match (Johanson et al. 2011).

Remote Alaska and Remote Update Enumerate had the lowest count and match ratios. The count and match ratios for Remote Update Enumerate were 36.0 percent and 27.5 percent respectively. Remote Alaska had the lowest count and match ratios at 20.0 percent and 16.8 percent respectively. Remote Alaska and Remote Update Enumerate areas were designated as such because mail was considered undeliverable, thus accounting for the low count and match ratios.
Housing Unit Type

Table 6 shows 2010 Census and administrative records address count and match ratios by housing unit type.18 Multi-unit buildings with five to nine units had the highest count ratio (145.5 percent), followed by buildings with ten to nineteen units (136.6 percent). Multi-unit buildings with 20 or more units (118.7 percent), multi-unit buildings with two to four units (115.9 percent), and single-family homes (114.2 percent) all had lower count ratios, but they were still above 100 percent. The count ratio for trailer-mobile homes was considerably lower at 88.7 percent. The category “other,” which includes boats, recreational vehicles, and vans had the lowest count ratio at 49.4 percent.

Table 6. 2010 Census and Administrative Records Address Count and Match Numbers and Ratios by Housing Unit Type

<table>
<thead>
<tr>
<th>Housing Unit Type</th>
<th>2010 Census Address Count</th>
<th>2010 Census and Administrative Records Address Count</th>
<th>2010 Census and Administrative Records Address Match</th>
<th>2010 Census and Administrative Records Address Count Ratio</th>
<th>2010 Census and Administrative Records Address Match Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total</td>
<td>131,704,730</td>
<td>151,277,043</td>
<td>121,967,283</td>
<td>114.9</td>
<td>92.6</td>
</tr>
<tr>
<td>Multi-unit building – 2 to 4 units</td>
<td>7,412,416</td>
<td>8,590,969</td>
<td>5,902,065</td>
<td>115.9</td>
<td>79.6</td>
</tr>
<tr>
<td>Multi-unit building – 5 to 9 units</td>
<td>3,807,849</td>
<td>5,540,284</td>
<td>3,529,097</td>
<td>145.5</td>
<td>92.7</td>
</tr>
<tr>
<td>Multi-unit building – 10 to 19 units</td>
<td>4,069,731</td>
<td>5,559,212</td>
<td>3,814,398</td>
<td>136.6</td>
<td>93.7</td>
</tr>
<tr>
<td>Multi-unit building – 20 or more units</td>
<td>14,184,728</td>
<td>16,838,161</td>
<td>13,137,945</td>
<td>118.7</td>
<td>92.6</td>
</tr>
<tr>
<td>Other - boat, recreation vehicle, van, etc.</td>
<td>125,493</td>
<td>61,966</td>
<td>34,409</td>
<td>49.4</td>
<td>27.4</td>
</tr>
<tr>
<td>Single-family Home</td>
<td>94,744,173</td>
<td>108,158,255</td>
<td>89,506,322</td>
<td>114.2</td>
<td>94.5</td>
</tr>
<tr>
<td>Trailer-Mobile home</td>
<td>7,360,340</td>
<td>6,528,196</td>
<td>6,043,047</td>
<td>88.7</td>
<td>82.1</td>
</tr>
</tbody>
</table>

Sources: 2010 Census and 2010 Census Match Study Administrative Records Data.

Single-family homes had the highest housing type match ratio at 94.5 percent. Most of the addresses in the United States were single-family homes in the 2010 Census at 94.7 million. Of these, administrative records matched to 89.5 million. After single-family homes, the next highest matches were in multi-unit buildings with ten to nineteen units (93.7 percent), five to nine units (92.7 percent), and 20 or more units (92.6 percent), followed by trailer-mobile homes (82.1 percent).

Multi-unit buildings with two to four units (79.6 percent) had a considerably lower percentage match relative to other multi-unit building categories. This lower match may be in part due to smaller multi-unit structures having potentially more problematic addresses in some parts of the country. In some geographic areas, units are added to single units or small multi-units, and these added units may lack unit designations or mail may be delivered to one box (Virgile 2012).

18 2010 Census and administrative records address housing unit type was assigned based on unit type designation in the MAF, the structure point permanent ID, and the number of units assigned to the MAFID in the MAF.
These types of situations would make addresses more difficult to match between administrative records and 2010 Census data.

**Race and Hispanic Origin of Householder and Census Operations**

Thus far, the figures and tables that have been discussed focus on the 131.7 million addresses in the 2010 Census and 151.3 million addresses in administrative records, regardless of whether they were occupied or vacant. The universe for this sub-section is occupied housing units.

Table 7 shows 2010 Census match ratios by 2010 Census race and Hispanic origin of the householder and mode of data collection. Count ratios are not included because administrative records address data did not include demographic characteristics on the householder. The occupied housing unit universe in Table 7 is 116.7 million housing units. Of the occupied housing units in the 2010 Census, administrative records matched to 110.5 million.

Note that the characteristic, mode, count imputation, and proxy data in Table 7 is from the 2010 Census, thus the Hispanic origin and race of householder analysis is not based on matched Hispanic origin and race responses in the 2010 Census and administrative records. Matched demographic response data will be evaluated in section 5.4 of this report.

The proportion of 2010 Census addresses that administrative records matched was similar for both Hispanic and non-Hispanic householders. Of the 13.5 million addresses that had a Hispanic householder, administrative records matched to 12.7 million or 94.2 percent. Of the 103.3 million addresses that had a non-Hispanic householder in the 2010 Census, administrative records matched to 97.8 million or 94.7 percent.

For race, 95.8 percent of 2010 Census addresses with a householder that reported Asian alone matched to administrative records. Of the 4.6 million addresses that had a householder that reported Asian alone, administrative records matched to 4.4 million. Addresses that had householders who reported Black alone had the next highest percentage matches at 94.9 percent, followed by White alone (94.8 percent), Two or More Races (94.3 percent), SOR alone (93.6 percent), and Native Hawaiian or Other Pacific Islander (NHPI) alone (93.5 percent). Addresses that had AIAN alone householders had a much lower match relative to the other race groups, 82.3 percent.
Table 7. 2010 Census and Administrative Records Address Match by Race and Hispanic Origin of Householder, Mode, Imputation, and Proxy

<table>
<thead>
<tr>
<th>Demographic Characteristics of Householder, Mode, Count Imputation, and Proxy</th>
<th>2010 Census Address Count</th>
<th>2010 Census and Administrative Records Address Match</th>
<th>2010 Census and Administrative Records Address Match Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Occupied Housing Units</td>
<td>116,716,292</td>
<td>110,504,340</td>
<td>94.7</td>
</tr>
<tr>
<td>Hispanic or Latino Origin</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hispanic</td>
<td>13,461,366</td>
<td>12,681,754</td>
<td>94.2</td>
</tr>
<tr>
<td>Not Hispanic</td>
<td>103,254,926</td>
<td>97,822,586</td>
<td>94.7</td>
</tr>
<tr>
<td>Race</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>White Alone</td>
<td>89,754,352</td>
<td>85,078,408</td>
<td>94.8</td>
</tr>
<tr>
<td>Black Alone</td>
<td>14,129,983</td>
<td>13,403,061</td>
<td>94.9</td>
</tr>
<tr>
<td>American Indian or Alaska Native Alone</td>
<td>939,707</td>
<td>773,742</td>
<td>82.3</td>
</tr>
<tr>
<td>Asian Alone</td>
<td>4,632,164</td>
<td>4,438,090</td>
<td>95.8</td>
</tr>
<tr>
<td>Native Hawaiian or Other Pacific Islander Alone</td>
<td>143,932</td>
<td>134,599</td>
<td>93.5</td>
</tr>
<tr>
<td>Some Other Race Alone</td>
<td>4,916,427</td>
<td>4,602,454</td>
<td>93.6</td>
</tr>
<tr>
<td>Two or More Races</td>
<td>2,199,727</td>
<td>2,073,986</td>
<td>94.3</td>
</tr>
<tr>
<td>Mode</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Nonresponse Followup</td>
<td>23,584,428</td>
<td>21,039,269</td>
<td>89.2</td>
</tr>
<tr>
<td>Mailout/Mailback</td>
<td>82,780,761</td>
<td>80,345,450</td>
<td>97.1</td>
</tr>
<tr>
<td>Other</td>
<td>10,351,103</td>
<td>9,119,621</td>
<td>88.1</td>
</tr>
<tr>
<td>Count Imputation</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Not Imputed</td>
<td>116,282,183</td>
<td>110,166,897</td>
<td>94.7</td>
</tr>
<tr>
<td>Imputed</td>
<td>434,109</td>
<td>337,443</td>
<td>77.7</td>
</tr>
<tr>
<td>Proxy</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Not by Proxy</td>
<td>109,800,016</td>
<td>104,480,943</td>
<td>95.2</td>
</tr>
<tr>
<td>By Proxy</td>
<td>6,916,276</td>
<td>6,023,397</td>
<td>87.1</td>
</tr>
</tbody>
</table>

The Mode category “Other” is a residual category that includes responses that were not obtained through either Nonresponse Followup or Mailout/Mailback.

Sources: 2010 Census and 2010 Census Match Study Administrative Records Data.

The areas and associated TEAs where the AIAN population lives may in part be why the address match was lower in households with a householder who reported AIAN alone. For instance, only 70.2 percent of addresses where the householder was AIAN alone were in the Mailout/Mailback TEA compared to 90 percent and above for all other race groups. The match was conducted by MAFID; future research will explore whether the census addresses with high proportions of the AIAN population contained matchable addresses or physical locations.
Administrative records matched to 80.3 million or 97.1 percent of the 82.8 million 2010 Census addresses enumerated by Mailout/Mailback. A lower percentage of administrative records addresses matched to 2010 Census addresses in NRFU and other modes. Of the 23.6 million addresses that responded in NRFU, administrative records matched to 21.0 million or 89.2 percent. Of the approximately 434,000 addresses for which a population count was imputed, administrative records matched to approximately 337,000 or 77.7 percent. There were 6.9 million addresses that had a form of proxy response meaning that the 2010 Census response may have come from neighbors, building managers, or new households reporting on previous households. Of these, administrative records matched to 6.0 million or 87.1 percent. Since the quality of address data should not vary significantly between NRFU and Mailout/Mailback universes or between proxy and non-proxy cases, future research should further evaluate the address match ratio differences between Mailout/Mailback and NRFU and also proxy and non-proxy responses.

5.2 Person Count and Match

Nation

In this section, match ratios must be interpreted slightly differently compared to the previous section on addresses. In the address count and match section, all 2010 Census addresses had MAFIDs, therefore all of the 131.7 million addresses had the potential to be matched to administrative records with MAFIDs. This is not the case for persons, as not all persons in the 2010 Census received a unique person identifier, or PIK. This reduces the number of persons in the 2010 Census that have the potential to match to administrative records, contributing to lower match ratios for persons relative to addresses.

Figure 4 shows the number and match of 2010 Census and administrative records persons. There were 308.7 million persons enumerated in the 2010 Census, 279.2 million of which had a

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19 Mailout/Mailback for mode is different from Mailout/Mailback for TEA in this report, as the latter refers to collection blocks that are designated for Mailout/Mailback data collection in an effort to determine how to efficiently enumerate people living in various parts of the country, and the former refers to the mode by which the household was actually enumerated. For example, a household may be designated in a Mailout/Mailback TEA but that household may respond via Nonresponse Followup.

20 The 2010 Census included duplicate PIKs whereas the administrative records contained unique PIKs. This resulted in instances where a single administrative record matched to multiple census records. Therefore, the sum of the count for persons in administrative records with a PIK not in the 2010 Census (48.8 million) and the count for 2010 Census PIKs in administrative records (273.6 million) does not equal the number of persons in administrative records with a PIK (312.2 million).
PIK. There were 312.2 million persons in administrative records that were alive on Census Day and had a PIK. Administrative records matched to the vast majority of 2010 Census PIKs, 273.6 million or 98.0 percent. The percentage of all 2010 Census persons, those with a PIK and those without, that matched to administrative records is about 10 percentage points lower at 88.6 percent. For the remainder of this section, unless otherwise specified, match ratios are based on the match of all persons in the 2010 Census relative to administrative records PIKs.

Figure 4. Count and Match of 2010 Census and Administrative Records Persons

Sources: 2010 Census and 2010 Census Match Study Administrative Records Data.

There were 29.6 million 2010 Census persons that failed the validation process and therefore did not receive a PIK, meaning that record linkage between these persons and administrative records was not possible. Of these 29.6 million persons, 10.3 million could not be sent through the PVS process as they lacked name and date of birth, and 19.3 million went through the PVS process but failed the validation process.

21 Future research will focus on direct matching of persons across files without validating against a reference file.
Of the 2010 Census unPIKed persons, there were 9.0 million persons whose 2010 Census response came from a form of proxy response wherein neighbors or new households reported on previous households. While many neighbors and new households may be able to provide name and date of birth information that would allow the validation of a record, other neighbors and new households were not able to provide this information adequately. There were also 1.2 million records that did not receive a PIK because the people in these households were imputed in the 2010 Census.

There were 48.8 million administrative records that were assigned a PIK but did not match to the 2010 Census. There is likely an overlap between the 29.6 million persons in the 2010 Census that did not receive a PIK and the 48.8 million persons in administrative records that received a PIK but did not match to the 2010 Census. Future research will study these two universes and their potential overlap.

There were 5.5 million 2010 Census persons with a PIK that were not in administrative records. About 4.0 million of these persons were children under the age of 17, and approximately 891,000 of these had an age of 0 in the 2010 Census. There are several reasons why this age group is less likely to be in administrative records compared to the 2010 Census. Tax data are one important source of information on children in administrative records. Therefore, how and when taxes are filed in combination with particular aspects of the tax data that the Census Bureau received from the IRS impact the coverage of children in administrative records. Children born on or after January 1, 2010 would not be claimed on 2009 taxes, therefore they may have been reported in the 2010 Census, but they would not likely be in the administrative records data used for this report. Additionally, tax forms such as 1040EZ do not collect data on dependents. There were also a number of dependents in administrative records that did not receive a PIK because there was not enough information to validate the records. Also, the IRS 1040 data used in the 2010 Census Match Study only had information on the first four dependents on a tax return, potentially limiting the number of children reported in larger households. Future research will include assessing other types of tax return data that include all dependents.

Region

Table 8 shows the 2010 Census person count, the number of PIKs in the 2010 Census, administrative records person count, the number of 2010 Census and administrative records that matched, and the 2010 Census and administrative records person count and match ratios by region.

The 2010 Census and administrative records person count ratio for the total U.S. population was 101.1 percent. All regions also had a person count ratio of about 101 percent. The Northeast and West had the same count ratio (101.4 percent). The Midwest had a slightly lower count ratio (101.1 percent), followed by the South (100.8 percent). These count ratios mirror the person
counts, where administrative records had a slightly higher count of persons relative to the 2010 Census for the total population and across all four regions.

Table 8. 2010 Census and Administrative Records Person Count and Match Numbers and Ratios by Region

<table>
<thead>
<tr>
<th>Region</th>
<th>2010 Census Person Count</th>
<th>2010 Census Persons with a PIK</th>
<th>Administrative Records Person Count</th>
<th>2010 Census and Administrative Records Person Match</th>
<th>2010 Census and Administrative Records Person Count Ratio</th>
<th>2010 Census and Administrative Records Person Match Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total</td>
<td>308,745,538</td>
<td>279,179,329</td>
<td>312,214,325</td>
<td>273,643,411</td>
<td>101.1</td>
<td>88.6</td>
</tr>
<tr>
<td>Northeast</td>
<td>55,317,240</td>
<td>50,506,657</td>
<td>56,097,631</td>
<td>49,624,941</td>
<td>101.4</td>
<td>89.7</td>
</tr>
<tr>
<td>Midwest</td>
<td>66,927,001</td>
<td>62,498,752</td>
<td>67,672,118</td>
<td>61,340,240</td>
<td>101.1</td>
<td>91.7</td>
</tr>
<tr>
<td>South</td>
<td>114,555,744</td>
<td>102,720,450</td>
<td>115,504,373</td>
<td>100,766,768</td>
<td>100.8</td>
<td>88.0</td>
</tr>
<tr>
<td>West</td>
<td>71,945,553</td>
<td>63,453,470</td>
<td>72,940,203</td>
<td>61,911,462</td>
<td>101.4</td>
<td>86.1</td>
</tr>
</tbody>
</table>

Sources: 2010 Census and 2010 Census Match Study Administrative Records Data.

As discussed above, 88.6 percent of all 2010 Census persons (PIKed and unPIKed) matched to administrative records. The Midwest had the highest percentage of 2010 Census persons that were PIKed (93.4 percent) and that matched to administrative records (91.7 percent). The Northeast had the second highest percentage of 2010 Census persons that were PIKed (91.3 percent) and that matched to administrative records (89.7 percent), followed by the South. The West had the lowest percentage of PIKed 2010 Census persons (88.2 percent) and 2010 Census records that matched to administrative records (86.1 percent).

State

Table 9 shows the 2010 Census person count, the number of PIKs in the 2010 Census, the administrative records person count, the number of 2010 Census and administrative records that matched, and the 2010 Census and administrative records count and match ratios by state.

The person count ratio ranged from 96.9 percent to 103.9 percent across states. Thirteen states had a count ratio below 100 percent, fifteen states had a count ratio of 100 percent, and twenty-three states had a count ratio greater than 100 percent. The states with the highest person count ratios were New Jersey (103.9 percent), Illinois (103.3 percent), Georgia (102.7 percent), California (102.4 percent), and Washington (102.4 percent). The states with the lowest person count ratios were Wyoming (96.9 percent), North Dakota (97.6 percent), Arizona (97.9 percent), Montana (98.2 percent), and New Mexico (98.3 percent). All of the regions were represented within the ten states that had the highest count ratios. Of the ten states with the lowest count ratios, half were in the West, two were in the South, two were in the Midwest, and one was in the Northeast.
Table 9. 2010 Census and Administrative Records Person Count and Match Numbers and
Ratios by State

2010 Decennial
Person Count
308,745,538

2010 Census
Persons with a
PIK
279,179,329

Administrative
Records Person
Count
312,214,325

2010 Census
and
Administrative
Records Person
Match
273,643,411

4,779,736
710,231
6,392,017
2,915,918
37,253,956
5,029,196
3,574,097
897,934
601,723
18,801,310
9,687,653
1,360,301
1,567,582
12,830,632
6,483,802
3,046,355
2,853,118
4,339,367
4,533,372
1,328,361
5,773,552
6,547,629
9,883,640
5,303,925
2,967,297
5,988,927
989,415
1,826,341
2,700,551
1,316,470
8,791,894
2,059,179
19,378,102
9,535,483
672,591
11,536,504
3,751,351
3,831,074
12,702,379
1,052,567
4,625,364
814,180
6,346,105
25,145,561
2,763,885
625,741
8,001,024
6,724,540
1,852,994
5,686,986
563,626

4,291,898
640,013
5,504,074
2,665,171
32,518,962
4,482,335
3,307,240
809,132
522,688
16,800,443
8,520,330
1,206,191
1,428,711
11,733,482
6,054,511
2,889,518
2,670,501
3,994,765
4,065,851
1,256,619
5,257,560
6,087,938
9,264,073
5,016,847
2,703,142
5,578,535
902,296
1,705,041
2,305,111
1,244,718
7,976,238
1,783,742
17,178,954
8,531,921
639,442
10,811,996
3,401,933
3,485,866
11,893,542
965,728
4,212,922
755,176
5,794,732
22,128,264
2,551,307
595,680
7,335,606
6,133,267
1,684,092
5,379,630
511,595

4,855,249
716,305
6,260,469
2,903,339
38,160,772
5,039,949
3,608,268
912,088
606,137
19,008,662
9,945,565
1,371,877
1,546,532
13,255,633
6,572,141
3,048,064
2,873,274
4,397,339
4,583,043
1,340,538
5,880,321
6,651,229
9,804,204
5,348,667
3,004,903
5,987,199
971,295
1,832,976
2,744,855
1,335,435
9,138,823
2,023,747
19,565,132
9,509,731
656,192
11,740,953
3,763,742
3,868,850
12,779,595
1,057,920
4,606,817
813,677
6,441,396
25,173,066
2,804,835
620,691
8,085,475
6,884,715
1,827,500
5,739,138
546,002

4,228,684
635,613
5,372,306
2,621,373
31,603,657
4,391,915
3,253,223
796,215
511,746
16,493,170
8,335,517
1,182,070
1,397,038
11,531,040
5,958,989
2,851,878
2,624,387
3,934,626
3,996,293
1,239,680
5,152,768
5,990,853
8,908,584
4,947,694
2,658,172
5,493,569
890,441
1,681,487
2,253,127
1,228,380
7,836,027
1,749,475
16,829,755
8,381,227
632,637
10,654,439
3,344,268
3,422,049
11,704,799
953,304
4,143,006
746,041
5,706,995
21,598,531
2,481,704
588,920
7,206,853
6,028,786
1,657,324
5,309,495
503,281

State

Total
Alabama
Alaska
Arizona
Arkansas
California
Colorado
Connecticut
Delaware
District of Columbia
Florida
Georgia
Hawaii
Idaho
Illinois
Indiana
Iowa
Kansas
Kentucky
Louisiana
Maine
Maryland
Massachusetts
Michigan
Minnesota
Mississippi
Missouri
Montana
Nebraska
Nevada
New Hampshire
New Jersey
New Mexico
New York
North Carolina
North Dakota
Ohio
Oklahoma
Oregon
Pennsylvania
Rhode Island
South Carolina
South Dakota
Tennessee
Texas
Utah
Vermont
Virginia
Washington
West Virginia
Wisconsin
Wyoming

2010 Census
and
Administrative
Records
Person Count
Ratio
101.1

2010 Census
and
Administrative
Records
Person Match
Ratio
88.6

101.6
100.9
97.9
99.6
102.4
100.2
101.0
101.6
100.7
101.1
102.7
100.9
98.7
103.3
101.4
100.1
100.7
101.3
101.1
100.9
101.8
101.6
99.2
100.8
101.3
100.0
98.2
100.4
101.6
101.4
103.9
98.3
101.0
99.7
97.6
101.8
100.3
101.0
100.6
100.5
99.6
99.9
101.5
100.1
101.5
99.2
101.1
102.4
98.6
100.9
96.9

88.5
89.5
84.0
89.9
84.8
87.3
91.0
88.7
85.0
87.7
86.0
86.9
89.1
89.9
91.9
93.6
92.0
90.7
88.2
93.3
89.2
91.5
90.1
93.3
89.6
91.7
90.0
92.1
83.4
93.3
89.1
85.0
86.8
87.9
94.1
92.4
89.1
89.3
92.1
90.6
89.6
91.6
89.9
85.9
89.8
94.1
90.1
89.7
89.4
93.4
89.3

Sources: 2010 Census and 2010 Census Match Study Administrative Records Data.

28
000097


The match ratios ranged from 83.4 percent to 94.1 percent across states. Thirty states had match ratios below 90 percent and twenty-one states had match ratios at 90 percent or above. The states with the highest match ratios were Vermont (94.1 percent), North Dakota (94.1 percent), Iowa (93.6 percent), Wisconsin (93.4 percent), and Maine (93.3 percent). The states with the lowest match ratios were Nevada (83.4 percent), Arizona (84.0 percent), California (84.8 percent), New Mexico (85.0 percent), and the District of Columbia (85.0 percent). Of the ten states that had the highest percentages of 2010 Census and administrative records that matched, six were in the Midwest and four were in the Northeast. Of the ten states that had the lowest percentages of 2010 Census and administrative records that matched, six were in the West, three were in the South, and one was in the Northeast. These results are consistent with the region results, where the Midwest and Northeast had higher match ratios than the South and West.

**County**

For administrative records, the universe for this sub-section on counties is persons that had information on county of residence. This is slightly lower than the total number of people with PIKs in administrative records because some data sources provided state but not sub-state geographic information. Therefore, there are about 46,000 fewer persons in administrative records represented in this section relative to other sub-sections within the person count and match section.

Figure 5 shows person count ratios for the 2010 Census and administrative records by county. Green indicates counties with a count ratio that is closer to 100 percent, yellow and orange indicate low count ratios, and blue and purple represent high count ratios. This map is different from the patterns observed with address county count ratios, where there was a discernible regional and state pattern. This map shows that there were 1,454 counties, almost half of all counties, that had a count ratio close to 100.0 percent and they were distributed relatively evenly across the United States. This is consistent with regional patterns where all region count ratios were similar to the United States count ratio of 101.0 percent.

The person count ratio range across counties was 48.6 percent to 355.2 percent. Of the ten counties with the lowest person count ratios, seven were in the West and three were in the South. Four of the counties in the West were in Colorado: Crowley (48.6 percent), San Juan (58.1 percent), Broomfield (63.4 percent), and Grand (66.2 percent). Three of the counties were in Alaska: Aleutians West (52.3 percent), Wrangell (57.5 percent), and North Slope (58.0 percent). The three counties that were in the South were all in Virginia—Radford (62.5 percent), Lexington (63.8 percent), and Williamsburg (66.5 percent).
Of the ten counties with the highest person count ratios, five were in the West, three in the Midwest, and two in the South. The five counties in the West were Bristol Bay, Alaska (355.2 percent); Lake and Peninsula, Alaska (335.5 percent); Kalawao, Hawaii (332.2 percent); Gilliam, Oregon (266.2 percent); and Sierra, California (209.8 percent). The three counties in the Midwest were Lane, Kansas (251.0 percent); Blaine, Nebraska (216.1 percent); and Hardin, Illinois (185.5 percent). The two counties in the South were McMullen, Texas (325.2 percent) and Roberts, Texas (199.9 percent).

Figure 6 shows 2010 Census and administrative records match ratios by county. Purple represents the counties with highest percent match, followed by blue. Green and yellow represent counties with mid-range match ratios, while orange represents low match ratios.
The person match ratio ranged from 59.4 percent to 97.1 percent across all counties. All states in the Midwest had counties with match ratios of 95.0 percent or above. Three states in the Northeast had counties with match ratios of 95.0 percent or above—Pennsylvania, New York, and Vermont. In the South, two states had counties with match ratios of 95 percent or above—Kentucky and Virginia. The only state in the West that had a county with a match ratio of 95.0 percent or above was Montana. The Midwestern and Northeastern states also had many counties that had match ratios between 90.0 percent and 94.9 percent. Many Southern states also had counties in this range, but less so compared to the Midwest and Northeast. All states in the West, except for Arizona and Hawaii, had at least one county that had a match ratio above 90.0 percent. The majority of counties that had match ratios below 80.0 percent were located in the West and South.

Of the ten counties that had the highest match ratios, nine were in the Midwest and one was in the Northeast. Two were in North Dakota: Foster (97.1 percent) and Emmons (96.6 percent). Two were in Kansas: Republic (96.9 percent) and Marshall (96.6 percent). Two were in Nebraska: Boone (96.9 percent) and Hooker (96.6 percent). Two were in Minnesota: Brown (96.8 percent) and Pope (96.6 percent). The remaining Midwestern county was Carroll, Iowa (96.7 percent). The county in the Northeast was Elk, Pennsylvania (96.8 percent).
Of the counties that had the lowest match ratios, eight of them were in the South. Four were in Texas: Garza (59.4 percent), Concho (60.2 percent), La Salle (63.4 percent), and Reeves (68.3 percent). Two were in Georgia: Stewart (68.4 percent) and Telfair (71.5 percent). The other two counties in the South were in Glades, Florida (70.4 percent) and Issaquena, Mississippi (71.1 percent). Kalawao, Hawaii (70.0 percent) and Shannon, South Dakota (70.3 percent) also were among the ten counties with the lowest match ratios.

The upper and lower bounds of the address count ratio range (12.1 percent to 208.2 percent) were considerably lower than the person count ratio range. The lower bound of the address match ratio range (8.0 percent) was sizably lower than the lower bound for the person match ratio range. Further research should investigate these differences.

**Federal and Commercial Data**

Table 10 shows person count and match ratios for the 2010 Census and federal and commercial data. In contrast to the federal and commercial address results, federal data had a higher number of persons and higher 2010 Census count and match ratios relative to commercial data. There were 302.2 million persons in the federal administrative records data and 222.0 million persons in the commercial data. The corresponding 2010 Census count ratios were 97.9 percent for federal data and 71.9 percent for commercial data. The match ratio for federal data was 87.4 percent compared to 64.6 percent for commercial data.

**Table 10. 2010 Census and Federal and Commercial Administrative Records Person Count and Match Numbers and Ratios**

<table>
<thead>
<tr>
<th>Data Type</th>
<th>Administrative Records Person Count</th>
<th>2010 Census and Administrative Records Person Count Ratio</th>
<th>2010 Census and Administrative Records Person Match Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Commercial</td>
<td>222,021,125</td>
<td>71.9</td>
<td>64.6</td>
</tr>
<tr>
<td>Federal</td>
<td>302,191,874</td>
<td>97.9</td>
<td>87.4</td>
</tr>
<tr>
<td>In both Commercial and Federal</td>
<td>211,998,674</td>
<td>68.7</td>
<td>63.4</td>
</tr>
</tbody>
</table>

Sources: 2010 Census and 2010 Census Match Study Administrative Records Data.

There were 212.0 million persons that were in both federal and commercial data. There were a large number of persons that were only found in either commercial data or federal data. However, there were substantially more persons that were only in federal data. There were 10.0 million validated persons that were in commercial data but not in federal data. There were 90.2 million persons that were in federal data but not in commercial data.

**Type of Enumeration Area**

Table 11 shows 2010 Census and administrative records count and match ratios by TEA.
Table 11. 2010 Census and Administrative Records Person Count and Match Numbers and Ratios by Type of Enumeration Area

<table>
<thead>
<tr>
<th>Type of Enumeration Area</th>
<th>2010 Census Person Count</th>
<th>Administrative Records Person Count</th>
<th>2010 Census and Administrative Records Person Match</th>
<th>2010 Census and Administrative Records Person Count Ratio</th>
<th>2010 Census and Administrative Records Person Match Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total</td>
<td>308,745,538</td>
<td>312,214,325</td>
<td>273,643,411</td>
<td>101.1</td>
<td>88.6</td>
</tr>
<tr>
<td>Mailout/Mailback</td>
<td>284,908,805</td>
<td>285,001,805</td>
<td>252,750,046</td>
<td>100.0</td>
<td>88.7</td>
</tr>
<tr>
<td>Military</td>
<td>922,712</td>
<td>869,278</td>
<td>797,116</td>
<td>94.2</td>
<td>86.4</td>
</tr>
<tr>
<td>Remote Alaska</td>
<td>60,261</td>
<td>55,291</td>
<td>51,203</td>
<td>91.8</td>
<td>85.0</td>
</tr>
<tr>
<td>Remote Update Enumerate</td>
<td>6,411</td>
<td>5,955</td>
<td>4,605</td>
<td>87.3</td>
<td>71.8</td>
</tr>
<tr>
<td>Update Enumerate</td>
<td>2,103,424</td>
<td>2,004,466</td>
<td>1,713,349</td>
<td>95.3</td>
<td>81.5</td>
</tr>
<tr>
<td>Update/Leave</td>
<td>15,636,992</td>
<td>14,834,417</td>
<td>13,936,170</td>
<td>94.9</td>
<td>89.1</td>
</tr>
<tr>
<td>Urban Update/Leave</td>
<td>5,106,933</td>
<td>4,820,539</td>
<td>4,390,922</td>
<td>94.4</td>
<td>86.0</td>
</tr>
<tr>
<td>No TEA</td>
<td>0</td>
<td>4,622,934</td>
<td>0</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

Note: A "-" indicates a ratio where the denominator was 0.
Sources: 2010 Census and 2010 Census Match Study Administrative Records Data.

TEA count ratios for persons were higher than for addresses, and the range across TEAs showed less variation. This was to be expected given that TEA is defined by address characteristics, thus it is less likely to affect person counts. The range of TEA count ratios for addresses was 20.0 percent to 200.5 percent, while the TEA count ratio range for persons was 87.3 percent to 100.0 percent. Mailout/Mailback had a count ratio equal to 100.0 percent. There were 284.9 million people in the Mailout/Mailback TEA in the 2010 Census and 285.0 million in administrative records. Update Enumerate had the next highest count ratio (95.3 percent), followed by Update/Leave (94.9 percent), Urban Update/Leave (94.4 percent), and Military (94.2 percent) all of which had count ratios of about 95.0 percent. Remote Alaska had a slightly lower count ratio at 91.8 percent and Remote Update Enumerate had the lowest count ratio (87.3 percent).

The person match ratio also varied less than the address match ratio. The TEA address match ratio ranged from 16.8 percent to 94.6 percent, while the TEA person match ratio ranged from 71.8 percent to 89.1 percent. All TEAs except Remote Update Enumerate had a match ratio above 80.0 percent. Except for Mailout/Mailback and Military TEAs, the person match ratios were higher than the corresponding address match ratios. Update/Leave had the highest match ratio (89.1 percent), followed by Mailout/Mailback (88.7 percent), Military (86.4 percent), Urban Update/Leave (86.0 percent), and Remote Alaska (85.0 percent). The match ratio for Update Enumerate was slightly lower (81.5 percent), and Remote Update Enumerate had the lowest match ratio (71.8 percent).

Demographic Characteristics, Mode, and Proxy

Table 12 shows the number and percentage of PIKs in the 2010 Census and the 2010 Census/administrative records match by demographic characteristics, mode, and proxy.
### Table 12. 2010 Census and Administrative Records Person Match by Demographic Characteristics, Mode, and Proxy

<table>
<thead>
<tr>
<th>Demographic Characteristics, Mode, and Proxy</th>
<th>2010 Census Person Count</th>
<th>2010 Census Persons with a PIK</th>
<th>2010 Census with a PIK not in Administrative Records</th>
<th>2010 Census and Administrative Records Person Match</th>
<th>2010 Census Persons without a PIK</th>
</tr>
</thead>
<tbody>
<tr>
<td>---------------------------------------------</td>
<td>--------------------------</td>
<td>--------------------------------</td>
<td>-----------------------------------------------------</td>
<td>--------------------------------------------------</td>
<td>-------------------------------</td>
</tr>
<tr>
<td>Total Population</td>
<td>308,745,538</td>
<td>279,179,329 90.4</td>
<td>5,535,918 1.8</td>
<td>273,643,411 88.6</td>
<td>29,566,209 9.6</td>
</tr>
<tr>
<td>Hispanic or Latino Origin</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hispanic</td>
<td>50,477,594</td>
<td>40,554,012 80.3</td>
<td>1,602,206 3.2</td>
<td>38,951,806 77.2</td>
<td>9,923,582 19.7</td>
</tr>
<tr>
<td>Not Hispanic</td>
<td>258,267,944</td>
<td>238,625,317 92.4</td>
<td>3,933,712 1.6</td>
<td>234,691,605 90.9</td>
<td>19,642,627 7.6</td>
</tr>
<tr>
<td>Race</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>White Alone</td>
<td>223,553,254</td>
<td>206,571,803 92.4</td>
<td>3,404,942 1.5</td>
<td>203,166,861 90.9</td>
<td>16,981,451 7.6</td>
</tr>
<tr>
<td>Black Alone</td>
<td>38,929,315</td>
<td>34,328,279 88.2</td>
<td>796,386 2.0</td>
<td>33,531,893 86.1</td>
<td>4,601,036 11.8</td>
</tr>
<tr>
<td>American Indian or Alaska Native Alone</td>
<td>2,932,370</td>
<td>2,542,640 86.7</td>
<td>45,712 1.6</td>
<td>2,496,928 85.2</td>
<td>389,730 13.3</td>
</tr>
<tr>
<td>Asian Alone</td>
<td>14,674,336</td>
<td>12,974,148 88.4</td>
<td>318,390 2.2</td>
<td>12,655,758 86.2</td>
<td>1,700,188 11.6</td>
</tr>
<tr>
<td>Native Hawaiian or Other Pacific Islander</td>
<td>540,064</td>
<td>453,090 83.9</td>
<td>15,834 2.9</td>
<td>437,256 81.0</td>
<td>86,974 16.1</td>
</tr>
<tr>
<td>Some Other Race</td>
<td>19,107,368</td>
<td>14,232,873 74.5</td>
<td>649,901 3.4</td>
<td>13,582,972 71.1</td>
<td>4,874,495 25.5</td>
</tr>
<tr>
<td>Two or More Races</td>
<td>9,008,831</td>
<td>8,076,496 89.7</td>
<td>304,753 3.4</td>
<td>7,771,743 86.3</td>
<td>932,335 10.3</td>
</tr>
<tr>
<td>Age</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>0-2</td>
<td>12,019,146</td>
<td>10,776,958 89.7</td>
<td>1,337,667 11.1</td>
<td>9,439,291 78.5</td>
<td>1,242,188 10.3</td>
</tr>
<tr>
<td>3-17</td>
<td>62,162,321</td>
<td>56,554,181 91.0</td>
<td>2,647,192 4.3</td>
<td>53,906,989 86.7</td>
<td>5,608,140 9.0</td>
</tr>
<tr>
<td>18-24</td>
<td>30,646,519</td>
<td>26,147,233 85.3</td>
<td>478,323 1.6</td>
<td>25,668,910 83.8</td>
<td>4,499,286 14.7</td>
</tr>
<tr>
<td>25-44</td>
<td>82,123,330</td>
<td>72,072,154 87.8</td>
<td>670,314 0.8</td>
<td>71,401,840 86.9</td>
<td>10,051,176 12.2</td>
</tr>
<tr>
<td>45-64</td>
<td>81,499,596</td>
<td>75,765,796 93.0</td>
<td>284,406 0.3</td>
<td>75,481,390 92.6</td>
<td>5,733,800 7.0</td>
</tr>
<tr>
<td>65-74</td>
<td>21,727,578</td>
<td>20,502,704 94.4</td>
<td>59,034 0.3</td>
<td>20,443,670 94.1</td>
<td>1,224,874 5.6</td>
</tr>
<tr>
<td>75 and older</td>
<td>18,567,048</td>
<td>17,360,303 93.5</td>
<td>58,982 0.3</td>
<td>17,301,321 93.2</td>
<td>1,206,745 6.5</td>
</tr>
<tr>
<td>Sex</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Male</td>
<td>151,775,099</td>
<td>136,105,431 89.7</td>
<td>3,020,094 2.0</td>
<td>133,085,337 87.7</td>
<td>15,669,668 10.3</td>
</tr>
<tr>
<td>Female</td>
<td>156,970,439</td>
<td>143,073,898 91.1</td>
<td>2,515,824 1.6</td>
<td>140,558,074 89.5</td>
<td>13,896,541 8.9</td>
</tr>
<tr>
<td>Mode</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Nonresponse Followup</td>
<td>60,432,209</td>
<td>49,285,340 81.6</td>
<td>1,239,354 2.1</td>
<td>48,045,986 79.5</td>
<td>11,146,869 18.4</td>
</tr>
<tr>
<td>Mailout/Mailback</td>
<td>205,816,623</td>
<td>198,977,997 96.7</td>
<td>2,891,481 1.4</td>
<td>196,086,516 95.3</td>
<td>6,838,626 3.3</td>
</tr>
<tr>
<td>Other</td>
<td>42,496,706</td>
<td>30,915,992 72.7</td>
<td>1,405,083 3.3</td>
<td>29,510,909 69.4</td>
<td>11,580,714 27.3</td>
</tr>
<tr>
<td>Proxy</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Not by Proxy</td>
<td>295,163,226</td>
<td>274,587,574 93.0</td>
<td>5,463,417 1.9</td>
<td>269,124,157 91.2</td>
<td>20,575,652 7.0</td>
</tr>
<tr>
<td>By Proxy</td>
<td>13,582,312</td>
<td>4,591,755 33.8</td>
<td>72,501 0.5</td>
<td>4,519,254 33.3</td>
<td>8,990,557 66.2</td>
</tr>
</tbody>
</table>

Sources: 2010 Census and 2010 Census Match Study Administrative Records Data.
Note that the characteristic, mode, count imputation, and proxy data in Table 12 is from the 2010 Census, thus the Hispanic origin and race analysis is not based on matched Hispanic origin and race responses in the 2010 Census and administrative records. Matched demographic response data will be evaluated in section 5.4 of this report.

A higher percentage of the non-Hispanic population was PIKed in the 2010 Census relative to the Hispanic population. The non-Hispanic population also had a higher percentage that was in both the 2010 Census and administrative records relative to the Hispanic population. Of the 258.3 million non-Hispanics in the 2010 Census, 238.6 million or 92.4 percent were PIKed, and 234.7 million or 90.9 percent were in both the 2010 Census and administrative records.

While these results were lower for the Hispanic population, administrative records covered a substantial proportion of the Hispanic population in the 2010 Census. Of the 50.5 million Hispanics in the 2010 Census, 40.6 million or 80.3 percent were PIKed, and 39.0 million or 77.2 percent were in both the 2010 Census and administrative records.

The percentage of persons PIKed in the 2010 Census by race group ranged from 74.5 percent to 92.4 percent. The percentage of persons in the 2010 Census by race group who were also in administrative records was similar to, yet slightly lower than, the percentage PIKed in the 2010 Census, 71.1 percent to 90.9 percent.

The White alone population had the highest percentage PIKed in the 2010 Census and the highest percentage in both the 2010 Census and administrative records relative to all other race groups. Of the 223.6 million persons classified as White alone in the 2010 Census, 206.6 million or 92.4 percent were PIKed, and 203.2 million or 90.9 percent were in the 2010 Census and administrative records. The Two or More Races population had the second highest percentage PIKed in the 2010 Census and the second highest percentage also in administrative records. Of the 9.0 million persons classified as Two or More Races, 8.1 million or 89.7 percent were PIKed, and 7.8 million or 86.3 percent were in the 2010 Census and administrative records.

The Asian alone population had the third highest percentage PIKed (88.4 percent) in the 2010 Census and the third highest percentage that was in the 2010 Census and administrative records (86.2 percent), followed by the Black alone population, the AIAN alone population, and the NHPI alone population.

The SOR alone population had the lowest percentage (74.5 percent) PIKed in the 2010 Census and the lowest percentage in both the 2010 Census and administrative records (71.1 percent). This lower PIK percentage for the SOR alone population was largely driven by the Hispanic population, as 96.8 percent of those classified as SOR alone in the 2010 Census were of Hispanic origin (Humes et al. 2011).
The percentage of males PIKed in the 2010 Census was slightly lower than the percentage of females. Of the 151.8 million males in the 2010 Census, 136.1 million or 89.7 percent were PIKed, and 133.1 million or 87.7 percent were in both the 2010 Census and administrative records. Of the 157.0 million females in the 2010 Census, 143.1 million or 91.1 percent were PIKed, and 140.6 million or 89.5 percent were in both the 2010 Census and administrative records.

For age groups, the percentage PIKed in the 2010 Census ranged from 85.3 percent to 94.4 percent. The proportions in the 2010 Census and administrative records were slightly lower and ranged from 78.5 percent to 94.1 percent. Older age groups had higher proportions that were PIKed and in the 2010 Census and administrative records relative to younger age groups. The age group 65 to 74 had the highest percentage PIKed (94.4 percent) and in administrative records (94.1 percent). Of the 21.7 million persons aged 65 to 74, 20.5 million were PIKed and about the same number were found in administrative records. The age group of 75 and older had the second highest percentage PIKed (93.5 percent) and the second highest percentage in the 2010 Census and administrative records (93.2 percent). The age group 45 to 64 had the next highest percentages that were PIKed (93.0 percent) and also in administrative records (92.6 percent), followed by the age group 3 to 17 (91.0 percent and 86.7 percent). The age group 18 to 24 had the lowest percentage PIKed (85.3 percent) and the second lowest percentage in administrative records (83.8 percent).

For the age group 0 to 2, 89.7 percent were PIKed, but this age group had the lowest proportion in both the 2010 Census and administrative records at 78.5 percent. More than 11 percent of this age group was in the 2010 Census with a PIK but not in administrative records. This may be due in part to the tax filing issues discussed at the beginning of the person section. Those aged 3 to 17 were also less likely than other groups to be in both the 2010 Census and administrative records, where 4.3 percent of this age group was in the 2010 Census with a PIK but not in administrative records as compared to 1.6 percent or less for the age group 18 to 24.

A higher percentage of persons in the 2010 Census that lived in households that responded by mail were PIKed, and these persons were also more likely to be in administrative records compared to NRFU and other modes. Of the 205.8 million persons that were in households that responded by mail, 96.7 percent were PIKed and 95.3 percent were in administrative records. Of the 13.6 million proxy responses, a low percent were PIKed and were also in administrative records, about 33 percent. Of the 60.4 million persons in the 2010 Census that responded via NRFU, 49.3 million were PIKed and 48.0 million or 79.5 percent were in administrative records.
5.3 Person-Address Pair Count and Match

Nation

This section assesses administrative data relative to the 2010 Census after the best address model has been applied to select the best address for Census Day in the administrative data. As discussed above, the 2010 Census also has the same PIK at multiple addresses, and these duplicate person-address pairs in the 2010 Census are included in the following analysis.

Figure 7 shows the number and match of 2010 Census and administrative records person-address pairs. All persons in the 2010 Census were associated with an address, thus all 2010 Census person count and PIK numbers discussed in the person count and match section are the same in Figure 7. For instance, there were 308.7 million people in the 2010 Census with an address.

As noted in the person count and match section, there were 312.2 million persons in administrative records that had a PIK and were alive on Census Day. Of those, 301.5 million PIKed persons had one or more MAFIDs, and 10.7 million PIKed persons did not have a MAFID. Before we applied the best address model, there were 216.2 million 2010 Census person-address pairs that matched to administrative records. Of the 308.7 million persons in the 2010 Census, 70.0 percent matched to administrative records person-address pairs. Of the 279.2 million person-address pairs in the 2010 Census that had a PIK, 77.4 percent matched to administrative records person-address pairs. After applying the best address model to administrative records with multiple MAFIDs, there were 203.2 million 2010 Census person-address pairs that matched to administrative records. Of the 308.7 million persons in the 2010 Census, 65.8 percent matched to administrative records person-address pairs. Of the 279.2 million persons in the 2010 Census that had a PIK, 72.8 percent matched to administrative records person-address pairs.

There were 76.0 million 2010 Census person-address pairs with a PIK and MAFID that did not match to administrative records. There were 98.6 million administrative records person-address pairs with a PIK and MAFID that did not match to the 2010 Census.

22 The best address model was applied to the PIKs in administrative records with two or more MAFIDs. Among those PIKs with a MAFID, about 152.8 million PIKs (50.7 percent) had exactly one unique MAFID. Of those PIKs with multiple associated MAFIDs, 75.4 million (25.0 percent) had two MAFIDs, and 39.7 million (13.2 percent) had three MAFIDs. Another 19.2 million PIKs (6.4 percent) had four unique MAFIDs in the administrative records, and 8.5 million PIKs (2.8 percent) had five MAFIDs. The remaining 5.9 million PIKs with MAFIDs in the administrative records had six or more unique MAFIDs associated with them.

23 The 2010 Census included duplicate person-address pairs whereas the administrative records contained unique person-address pairs. This resulted in instances where a single administrative record person-address pair matched to multiple census record person-address pairs. Therefore, the sum of the count for administrative records PIK-MAFID pairs not in 2010 Census (98.6 million) and the count for 2010 Census PIK-MAFID pairs in administrative records (203.2 million) does not equal the number of administrative records PIK-MAFID pairs (301.5 million).
Figure 7. Count and Match of 2010 Census and Administrative Records Person-Address Pairs

Region

Table 13 shows the 2010 Census person-address count, administrative records person-address count, the number of 2010 Census and administrative records person-address pairs that matched, and the 2010 Census and administrative records person-address count and match ratios by region.
### Table 13. 2010 Census and Administrative Records Person-Address Count and Match Numbers and Ratios by Region

<table>
<thead>
<tr>
<th>Region</th>
<th>2010 Census Person-Address Count</th>
<th>Administrative Records Person-Address Count</th>
<th>2010 Census and Administrative Records Person-Address Match</th>
<th>2010 Census and Administrative Records Person-Address Count Ratio</th>
<th>2010 Census and Administrative Records Person-Address Match Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total</td>
<td>308,745,538</td>
<td>301,516,209</td>
<td>203,157,426</td>
<td>97.7</td>
<td>65.8</td>
</tr>
<tr>
<td>Northeast</td>
<td>55,317,240</td>
<td>53,973,110</td>
<td>36,432,719</td>
<td>97.6</td>
<td>65.9</td>
</tr>
<tr>
<td>Midwest</td>
<td>66,927,001</td>
<td>66,094,806</td>
<td>47,943,123</td>
<td>98.8</td>
<td>71.6</td>
</tr>
<tr>
<td>South</td>
<td>114,555,744</td>
<td>111,709,332</td>
<td>73,198,676</td>
<td>97.5</td>
<td>63.9</td>
</tr>
<tr>
<td>West</td>
<td>71,945,553</td>
<td>69,738,961</td>
<td>45,582,908</td>
<td>96.9</td>
<td>63.4</td>
</tr>
</tbody>
</table>

Sources: 2010 Census and 2010 Census Match Study Administrative Records Data.

The person-address count ratio for the United States was 97.7 percent. Across all regions, the person-address count ratio was close to the national count ratio. The person-address count ratio was highest for the Midwest at 98.8 percent, followed by the Northeast (97.6 percent), South (97.5 percent), and West (96.9 percent).

The match ratio for the United States was substantially lower than the count ratio (65.8 percent), and this was reflected across the regions. The person-address match ratio ranking among regions was the same as for the count ratios, where the Midwest had the highest match ratio (71.6 percent), followed by the Northeast (65.9 percent), South (63.9 percent), and West (63.4 percent).

**State**

Table 14 shows the 2010 Census person-address count, administrative records person-address count, the number of 2010 Census and administrative records person-address pairs that matched, and the 2010 Census and administrative records person-address count and match ratios by state.

The five states that had the highest person-address count ratios were Maryland (100.4 percent), Ohio (100.1 percent), Illinois (99.9 percent), Delaware (99.3 percent), and New Jersey (99.3 percent). Of the ten states with the highest count ratios, five were in the Midwest, three in the South, and one in the West.

The five states with the lowest count ratios were Alaska (84.1 percent), Wyoming (85.2 percent), New Mexico (87.8 percent), Montana (89.2 percent), and West Virginia (91.2 percent). Of the ten states with the lowest count ratios, seven were in the West, one in the South, one in the Midwest, and one in the Northeast. These results are consistent with the region person-address count ratios, where the Midwest had the highest count ratios and the West had the lowest.
<table>
<thead>
<tr>
<th>State</th>
<th>2010 Census Person-Address Count</th>
<th>Administrative Records Person-Address Count</th>
<th>2010 Census and Administrative Records Person-Address Count</th>
<th>2010 Census and Administrative Records Person-Address Match</th>
<th>2010 Census and Administrative Records Person-Address Match Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total</td>
<td>308,745,538</td>
<td>301,516,209</td>
<td>203,157,426</td>
<td>97.7</td>
<td>65.8</td>
</tr>
<tr>
<td>Alabama</td>
<td>4,779,736</td>
<td>4,680,999</td>
<td>2,981,411</td>
<td>97.9</td>
<td>62.4</td>
</tr>
<tr>
<td>Alaska</td>
<td>710,231</td>
<td>597,613</td>
<td>340,527</td>
<td>84.1</td>
<td>47.9</td>
</tr>
<tr>
<td>Arizona</td>
<td>6,392,017</td>
<td>5,882,725</td>
<td>3,702,602</td>
<td>92.0</td>
<td>57.9</td>
</tr>
<tr>
<td>Arkansas</td>
<td>2,915,918</td>
<td>2,769,483</td>
<td>1,795,591</td>
<td>95.0</td>
<td>61.6</td>
</tr>
<tr>
<td>California</td>
<td>37,253,956</td>
<td>36,895,430</td>
<td>23,858,501</td>
<td>99.0</td>
<td>64.0</td>
</tr>
<tr>
<td>Colorado</td>
<td>5,029,196</td>
<td>4,864,921</td>
<td>3,277,496</td>
<td>96.7</td>
<td>65.2</td>
</tr>
<tr>
<td>Connecticut</td>
<td>3,574,097</td>
<td>3,492,906</td>
<td>2,523,428</td>
<td>97.7</td>
<td>70.6</td>
</tr>
<tr>
<td>Delaware</td>
<td>897,934</td>
<td>891,639</td>
<td>623,461</td>
<td>99.3</td>
<td>69.4</td>
</tr>
<tr>
<td>District of Columbia</td>
<td>601,723</td>
<td>591,770</td>
<td>342,003</td>
<td>98.3</td>
<td>56.8</td>
</tr>
<tr>
<td>Florida</td>
<td>18,801,310</td>
<td>18,571,203</td>
<td>12,167,579</td>
<td>98.8</td>
<td>64.7</td>
</tr>
<tr>
<td>Georgia</td>
<td>9,685,953</td>
<td>9,548,384</td>
<td>5,996,844</td>
<td>98.6</td>
<td>61.9</td>
</tr>
<tr>
<td>Hawaii</td>
<td>1,360,301</td>
<td>1,253,669</td>
<td>741,802</td>
<td>92.2</td>
<td>54.3</td>
</tr>
<tr>
<td>Idaho</td>
<td>1,567,582</td>
<td>1,448,474</td>
<td>1,007,470</td>
<td>92.4</td>
<td>64.3</td>
</tr>
<tr>
<td>Illinois</td>
<td>12,830,632</td>
<td>12,822,700</td>
<td>8,630,674</td>
<td>99.9</td>
<td>67.3</td>
</tr>
<tr>
<td>Indiana</td>
<td>6,483,802</td>
<td>6,416,121</td>
<td>4,675,947</td>
<td>99.0</td>
<td>72.1</td>
</tr>
<tr>
<td>Iowa</td>
<td>3,046,355</td>
<td>2,977,126</td>
<td>2,266,850</td>
<td>97.7</td>
<td>74.4</td>
</tr>
<tr>
<td>Kansas</td>
<td>2,853,118</td>
<td>2,792,230</td>
<td>2,034,442</td>
<td>97.9</td>
<td>71.3</td>
</tr>
<tr>
<td>Kentucky</td>
<td>4,339,367</td>
<td>4,218,816</td>
<td>2,851,115</td>
<td>97.2</td>
<td>65.7</td>
</tr>
<tr>
<td>Louisiana</td>
<td>4,533,372</td>
<td>4,411,361</td>
<td>2,779,649</td>
<td>97.3</td>
<td>61.3</td>
</tr>
<tr>
<td>Maine</td>
<td>1,328,361</td>
<td>1,278,617</td>
<td>862,986</td>
<td>96.3</td>
<td>65.0</td>
</tr>
<tr>
<td>Maryland</td>
<td>5,773,552</td>
<td>5,794,145</td>
<td>4,121,327</td>
<td>100.4</td>
<td>71.4</td>
</tr>
<tr>
<td>Massachusetts</td>
<td>6,547,629</td>
<td>6,453,301</td>
<td>4,528,654</td>
<td>98.6</td>
<td>69.2</td>
</tr>
<tr>
<td>Michigan</td>
<td>9,883,640</td>
<td>9,667,350</td>
<td>7,092,248</td>
<td>97.8</td>
<td>71.8</td>
</tr>
<tr>
<td>Minnesota</td>
<td>5,303,925</td>
<td>5,245,597</td>
<td>4,014,818</td>
<td>98.9</td>
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</tr>
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<td>Mississippi</td>
<td>2,967,297</td>
<td>2,857,348</td>
<td>1,722,241</td>
<td>96.3</td>
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</tr>
<tr>
<td>Missouri</td>
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<td>5,830,474</td>
<td>4,120,999</td>
<td>97.4</td>
<td>68.8</td>
</tr>
<tr>
<td>Montana</td>
<td>989,415</td>
<td>882,079</td>
<td>569,270</td>
<td>89.2</td>
<td>57.5</td>
</tr>
<tr>
<td>Nebraska</td>
<td>1,826,341</td>
<td>1,780,571</td>
<td>1,323,040</td>
<td>97.5</td>
<td>72.4</td>
</tr>
<tr>
<td>Nevada</td>
<td>2,700,551</td>
<td>2,654,172</td>
<td>1,616,682</td>
<td>98.3</td>
<td>59.9</td>
</tr>
<tr>
<td>New Hampshire</td>
<td>1,316,470</td>
<td>1,286,020</td>
<td>927,007</td>
<td>97.7</td>
<td>70.4</td>
</tr>
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<td>New Jersey</td>
<td>8,791,894</td>
<td>8,727,028</td>
<td>5,963,720</td>
<td>99.3</td>
<td>67.8</td>
</tr>
<tr>
<td>New Mexico</td>
<td>2,059,179</td>
<td>1,807,812</td>
<td>1,056,957</td>
<td>87.8</td>
<td>51.3</td>
</tr>
<tr>
<td>New York</td>
<td>19,378,102</td>
<td>18,666,689</td>
<td>11,472,664</td>
<td>96.3</td>
<td>59.2</td>
</tr>
<tr>
<td>North Carolina</td>
<td>9,535,483</td>
<td>9,169,433</td>
<td>6,191,068</td>
<td>96.2</td>
<td>64.9</td>
</tr>
<tr>
<td>North Dakota</td>
<td>672,591</td>
<td>623,567</td>
<td>448,212</td>
<td>92.7</td>
<td>66.6</td>
</tr>
<tr>
<td>Ohio</td>
<td>11,536,504</td>
<td>11,552,963</td>
<td>8,518,977</td>
<td>100.1</td>
<td>73.8</td>
</tr>
<tr>
<td>Oklahoma</td>
<td>3,751,351</td>
<td>3,577,427</td>
<td>2,219,125</td>
<td>95.4</td>
<td>59.2</td>
</tr>
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<td>Oregon</td>
<td>3,831,074</td>
<td>3,716,295</td>
<td>2,610,007</td>
<td>97.0</td>
<td>68.1</td>
</tr>
<tr>
<td>Pennsylvania</td>
<td>12,702,379</td>
<td>12,482,815</td>
<td>9,075,510</td>
<td>98.3</td>
<td>71.4</td>
</tr>
<tr>
<td>Rhode Island</td>
<td>1,052,567</td>
<td>1,005,285</td>
<td>692,881</td>
<td>95.5</td>
<td>65.8</td>
</tr>
<tr>
<td>South Carolina</td>
<td>4,625,364</td>
<td>4,475,235</td>
<td>3,022,905</td>
<td>96.8</td>
<td>65.4</td>
</tr>
<tr>
<td>South Dakota</td>
<td>814,180</td>
<td>766,213</td>
<td>534,715</td>
<td>94.1</td>
<td>65.7</td>
</tr>
<tr>
<td>Tennessee</td>
<td>6,346,105</td>
<td>6,290,515</td>
<td>4,319,859</td>
<td>99.1</td>
<td>68.1</td>
</tr>
<tr>
<td>Texas</td>
<td>25,145,561</td>
<td>24,293,996</td>
<td>15,479,039</td>
<td>96.6</td>
<td>61.6</td>
</tr>
<tr>
<td>Utah</td>
<td>2,763,885</td>
<td>2,693,874</td>
<td>1,884,028</td>
<td>97.5</td>
<td>68.2</td>
</tr>
<tr>
<td>Vermont</td>
<td>625,741</td>
<td>580,449</td>
<td>385,869</td>
<td>92.8</td>
<td>61.7</td>
</tr>
<tr>
<td>Virginia</td>
<td>8,001,024</td>
<td>7,877,584</td>
<td>5,648,319</td>
<td>98.5</td>
<td>70.6</td>
</tr>
<tr>
<td>Washington</td>
<td>6,724,540</td>
<td>6,561,481</td>
<td>4,598,158</td>
<td>97.6</td>
<td>68.4</td>
</tr>
<tr>
<td>West Virginia</td>
<td>1,852,994</td>
<td>1,689,994</td>
<td>937,140</td>
<td>91.2</td>
<td>50.6</td>
</tr>
<tr>
<td>Wisconsin</td>
<td>5,686,986</td>
<td>5,619,894</td>
<td>4,282,201</td>
<td>98.8</td>
<td>75.3</td>
</tr>
<tr>
<td>Wyoming</td>
<td>563,626</td>
<td>480,416</td>
<td>319,408</td>
<td>85.2</td>
<td>56.7</td>
</tr>
</tbody>
</table>

Sources: 2010 Census and 2010 Census Match Study Administrative Records Data.
The five states with the highest person-address match ratios were all in the Midwest: Minnesota (75.7 percent), Wisconsin (75.3 percent), Iowa (74.4 percent), Ohio (73.8 percent), and Nebraska (72.4 percent). Of the ten states with the highest match ratios, eight were in the Midwest, one in the South, and one in the Northeast.

The five states with the lowest person-address match ratios were Alaska (47.9 percent), West Virginia (50.6 percent), New Mexico (51.3 percent), Hawaii (54.5 percent), and Wyoming (56.7 percent). Of the ten states with the lowest match ratios, six were in the West and four were in the South. Consistent with address results, states with low person-address count and match ratios tended to have fewer person-address pairs in Mailout/Mailback TEAs relative to states that had high count and match ratios.

**County**

Figure 8 shows the person-address count ratios by county. Blue indicates counties with a count ratio close to 100 percent.

![Figure 8. Count Ratio of 2010 Census and Administrative Records Person-Address Pairs by County](image)

Many states in the Midwest had counties with count ratios close to 100 percent, such as Iowa, Wisconsin, Illinois, Indiana, and Ohio. In the Northeast, a few states had counties with count...
ratios around 100 percent such as Pennsylvania and New Jersey. In the South, states that had counties with count ratios around 100 percent included Maryland, Tennessee, Kentucky, Delaware, and Alabama. Many states in the West had counties with low count ratios relative to the Midwest and South. These states include Wyoming, Arizona, New Mexico, and Alaska.

Figure 9 displays person-address match ratios by county. Purple and blue indicate counties with higher match ratios, while yellow and orange represent low match ratios. States in the Midwest that had counties with high match ratios include Iowa, Minnesota, Wisconsin, Ohio, and Indiana. In the South, states such as Virginia, Maryland, and Tennessee had counties with high match ratios. In the Northeast, states with high match ratios included Pennsylvania and New Jersey. Many states in the West and South had a number of counties with low match ratios.

Figure 9. Match Ratio of 2010 Census and Administrative Records Person-Address Pairs by County

Table 15 shows count ratios, match ratios, and TEA by county. Of the ten counties in the United States that had the lowest count ratios, eight were in Alaska: North Slope (17.1 percent), Aleutians West (19.3 percent), Wrangell (21.7 percent), Bethel (25.2 percent), Nome (26.0 percent), Haines (26.3 percent), Petersburg (27.3 percent), and Yukon-Koyukuk (29.2 percent). One county in Wyoming and one county in South Dakota were also among the ten counties with the lowest count ratios, Teton (29.2 percent) and Todd (31.9 percent), respectively.
Table 15. 2010 Census and Administrative Records Person-Address Count Ratio, Match Ratio, and Type of Enumeration Area for the Ten Counties with the Lowest and Highest Ratios

<table>
<thead>
<tr>
<th>County</th>
<th>Ratio</th>
<th>Mailout / Mailback</th>
<th>Military</th>
<th>Remote Alaska</th>
<th>Remote Update</th>
<th>Update Enumerate</th>
<th>Update / Leave</th>
<th>Urban Update / Leave</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Lowest Count Ratios</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>North Slope, Alaska</td>
<td>17.1</td>
<td>0.0</td>
<td>0.0</td>
<td>55.3</td>
<td>0.0</td>
<td>0.0</td>
<td>44.7</td>
<td>0.0</td>
</tr>
<tr>
<td>Aleutians West, Alaska</td>
<td>19.3</td>
<td>0.0</td>
<td>0.0</td>
<td>21.3</td>
<td>0.0</td>
<td>0.0</td>
<td>78.7</td>
<td>0.0</td>
</tr>
<tr>
<td>Wrangell, Alaska</td>
<td>21.7</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>7.0</td>
<td>0.0</td>
<td>93.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Bethel, Alaska</td>
<td>25.2</td>
<td>0.0</td>
<td>0.0</td>
<td>64.3</td>
<td>0.0</td>
<td>0.0</td>
<td>35.7</td>
<td>0.0</td>
</tr>
<tr>
<td>Nome, Alaska</td>
<td>26.0</td>
<td>0.0</td>
<td>0.0</td>
<td>61.1</td>
<td>0.0</td>
<td>0.0</td>
<td>38.9</td>
<td>0.0</td>
</tr>
<tr>
<td>Haines, Alaska</td>
<td>26.3</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>100.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Petersburg, Alaska</td>
<td>27.3</td>
<td>0.0</td>
<td>0.0</td>
<td>7.4</td>
<td>0.0</td>
<td>0.0</td>
<td>92.6</td>
<td>0.0</td>
</tr>
<tr>
<td>Teton, Wyoming</td>
<td>29.2</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>100.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Yukon-Koyukuk, Alaska</td>
<td>29.2</td>
<td>0.0</td>
<td>0.0</td>
<td>100.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Todd, South Dakota</td>
<td>31.9</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>100.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
</tr>
<tr>
<td><strong>Highest Count Ratios</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Kalawao, Hawaii</td>
<td>330.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>100.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Bristol Bay, Alaska</td>
<td>323.6</td>
<td>0.0</td>
<td>0.0</td>
<td>100.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
</tr>
<tr>
<td>McMullen, Texas</td>
<td>300.7</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>100.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Lake and Peninsula, Alaska</td>
<td>296.4</td>
<td>0.0</td>
<td>0.0</td>
<td>100.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Gilliam, Oregon</td>
<td>248.0</td>
<td>15.2</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>84.8</td>
<td>0.0</td>
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<tr>
<td>Lane, Kansas</td>
<td>232.0</td>
<td>17.8</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>82.2</td>
<td>0.0</td>
</tr>
<tr>
<td>Blaine, Nebraska</td>
<td>204.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>100.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Roberts, Texas</td>
<td>191.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>100.0</td>
</tr>
<tr>
<td>Sierra, California</td>
<td>187.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>100.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Hardin, Illinois</td>
<td>170.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>100.0</td>
<td>0.0</td>
</tr>
<tr>
<td><strong>Lowest Match Ratios</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Aleutians East, Alaska</td>
<td>0.9</td>
<td>0.0</td>
<td>0.0</td>
<td>65.5</td>
<td>0.0</td>
<td>0.0</td>
<td>34.5</td>
<td>0.0</td>
</tr>
<tr>
<td>Aleutians West, Alaska</td>
<td>1.5</td>
<td>0.0</td>
<td>0.0</td>
<td>21.3</td>
<td>0.0</td>
<td>0.0</td>
<td>78.7</td>
<td>0.0</td>
</tr>
<tr>
<td>Kalawao, Hawaii</td>
<td>2.2</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>100.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Yukon-Koyukuk, Alaska</td>
<td>2.4</td>
<td>0.0</td>
<td>0.0</td>
<td>100.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Shannon, South Dakota</td>
<td>2.4</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>100.0</td>
<td>0.0</td>
<td>0.0</td>
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</tr>
<tr>
<td>Yakutat, Alaska</td>
<td>3.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
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<tr>
<td>Northwest Arctic, Alaska</td>
<td>3.0</td>
<td>0.0</td>
<td>0.0</td>
<td>57.5</td>
<td>0.0</td>
<td>0.0</td>
<td>42.5</td>
<td>0.0</td>
</tr>
<tr>
<td>Dillingham, Alaska</td>
<td>3.1</td>
<td>0.0</td>
<td>0.0</td>
<td>51.9</td>
<td>0.0</td>
<td>0.0</td>
<td>48.1</td>
<td>0.0</td>
</tr>
<tr>
<td>Todd, South Dakota</td>
<td>3.4</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>100.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Nome, Alaska</td>
<td>3.7</td>
<td>0.0</td>
<td>0.0</td>
<td>61.1</td>
<td>0.0</td>
<td>0.0</td>
<td>38.9</td>
<td>0.0</td>
</tr>
<tr>
<td><strong>Highest Match Ratios</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Poquoson, Virginia</td>
<td>85.1</td>
<td>100.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Medina, Ohio</td>
<td>83.7</td>
<td>99.2</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.8</td>
<td>0.0</td>
</tr>
<tr>
<td>Ozaukee, Wisconsin</td>
<td>83.5</td>
<td>100.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Monroe, Illinois</td>
<td>83.5</td>
<td>95.6</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>4.4</td>
<td>0.0</td>
</tr>
<tr>
<td>Anoka, Minnesota</td>
<td>83.4</td>
<td>100.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Wood, Wisconsin</td>
<td>83.0</td>
<td>97.9</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>2.1</td>
<td>0.0</td>
</tr>
<tr>
<td>Washington, Wisconsin</td>
<td>82.9</td>
<td>100.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Scott, Minnesota</td>
<td>82.8</td>
<td>99.9</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.1</td>
<td>0.0</td>
</tr>
<tr>
<td>Waukesha, Wisconsin</td>
<td>82.8</td>
<td>99.8</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.2</td>
<td>0.0</td>
</tr>
<tr>
<td>Washington, Minnesota</td>
<td>82.6</td>
<td>100.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
</tr>
</tbody>
</table>

Sources: 2010 Census and 2010 Census Match Study Administrative Records Data.
Kalawao, Hawaii (330.0 percent) had the highest county count ratio, followed by Bristol Bay, Alaska (323.6 percent). Among the counties with the highest count ratios, three additional counties were in the West: Lake and Peninsula, Alaska (296.4 percent); Gilliam, Oregon (248.0 percent); and Sierra, California (187.0 percent). Two were in the South in Texas: McMullen (300.7 percent) and Roberts (191.0 percent). Three were in the Midwest: Lane, Kansas (232.0 percent); Blaine, Nebraska (204.0 percent); and Hardin, Illinois (170.0 percent).

Seven of the ten counties with the lowest match ratios were in Alaska: Aleutians East (0.9 percent), Aleutians West (1.5 percent), Yukon-Koyukuk (2.4 percent), Yakutat (3.0 percent), Northwest Arctic (3.0 percent), Dillingham (3.1 percent), and Nome (3.7 percent). Two counties were in South Dakota: Shannon (2.4 percent) and Todd (3.4 percent), and one county was in Hawaii: Kalawao (2.2 percent).

Of the ten counties with the highest match ratios, Poquoson, Virginia had the highest at 85.1 percent. The remaining nine counties were in the Midwest. Four of the counties were in Wisconsin: Ozaukee (83.5 percent), Wood (83.0 percent), Washington (82.9 percent), and Waukesha (82.8 percent). Three were in Minnesota: Anoka (83.4 percent), Scott (82.8 percent), and Washington (82.6 percent). One county was in Ohio: Medina (83.7 percent), and one county was in Illinois: Monroe (83.5 percent). For the person-address match ratios, as was observed for addresses, of the ten counties with the lowest and highest match ratios, counties that had more TEAs designated as Mailout/Mailback had higher matches. There was no discernible TEA pattern for count ratios.

Federal and Commercial Data

Table 16 shows count and match ratios for the 2010 Census and federal and commercial data.

**Table 16. 2010 Census and Federal and Commercial Administrative Records Person-Address Count and Match Numbers and Ratios**

<table>
<thead>
<tr>
<th>Data Type</th>
<th>Administrative Records Person-Address Count</th>
<th>2010 Census and Administrative Records Person-Address Count Ratio</th>
<th>2010 Census and Administrative Records Person-Address Match Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Commercial</td>
<td>219,466,721</td>
<td>71.1</td>
<td>48.8</td>
</tr>
<tr>
<td>Federal</td>
<td>292,328,979</td>
<td>94.7</td>
<td>65.4</td>
</tr>
<tr>
<td>In both Commercial and Federal</td>
<td>210,279,491</td>
<td>68.1</td>
<td>48.3</td>
</tr>
</tbody>
</table>

Sources: 2010 Census and 2010 Census Match Study Administrative Records Data.

Federal data had a higher number of person-address pairs and higher 2010 Census count and match ratios relative to commercial data. There were 292.3 million PIKs in federal data with a best address assigned in administrative records, resulting in a 2010 Census count ratio of 94.7 percent. There were 201.9 million 2010 Census records that matched to federal administrative records for a match ratio of 65.4 percent. There were 219.5 million PIKs in commercial data.
with a best address assigned in administrative records, and the 2010 Census count ratio was 71.1 percent. There were 150.6 million 2010 Census records that matched commercial data for a match ratio of 48.8 percent.

There were 210.3 million person-address pairs that were found in both federal and commercial data. There were a large number of person-address pairs that were only found in either commercial data or federal data. However, similar to the person results, there were substantially more person-address pairs that were only in federal data relative to commercial data. There were 9.2 million person-address pairs that were in commercial data but not in federal data. There were 82.0 million person-address pairs that were in federal data but not in commercial data.

**Type of Enumeration Area**

Table 17 shows 2010 Census and administrative records person-address count and match ratios by TEA.

**Table 17. 2010 Census and Administrative Records Person-Address Count and Match Numbers and Ratios by Type of Enumeration Area**

<table>
<thead>
<tr>
<th>Type of Enumeration Area</th>
<th>2010 Census Person-Address Count</th>
<th>Administrative Records Person-Address Count</th>
<th>2010 Census and Administrative Records Person-Address Match</th>
<th>2010 Census and Administrative Records Person-Address Count Ratio</th>
<th>2010 Census and Administrative Records Person-Address Match Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total</td>
<td>308,745,538</td>
<td>301,516,209</td>
<td>203,157,426</td>
<td>97.7</td>
<td>65.8</td>
</tr>
<tr>
<td>Mailout/Mailback</td>
<td>284,908,805</td>
<td>280,093,025</td>
<td>191,914,484</td>
<td>98.3</td>
<td>67.4</td>
</tr>
<tr>
<td>Military</td>
<td>922,712</td>
<td>619,979</td>
<td>358,116</td>
<td>67.2</td>
<td>38.8</td>
</tr>
<tr>
<td>Remote Alaska</td>
<td>60,261</td>
<td>35,019</td>
<td>2,902</td>
<td>58.1</td>
<td>4.8</td>
</tr>
<tr>
<td>Remote Update Enumerate</td>
<td>6,411</td>
<td>5,278</td>
<td>1,679</td>
<td>82.3</td>
<td>26.2</td>
</tr>
<tr>
<td>Update Enumerate</td>
<td>2,103,424</td>
<td>1,700,836</td>
<td>801,040</td>
<td>80.9</td>
<td>38.1</td>
</tr>
<tr>
<td>Update/Leave</td>
<td>15,636,992</td>
<td>12,922,334</td>
<td>7,787,827</td>
<td>82.6</td>
<td>49.8</td>
</tr>
<tr>
<td>Urban Update/Leave</td>
<td>5,106,933</td>
<td>4,210,134</td>
<td>2,291,378</td>
<td>82.4</td>
<td>44.9</td>
</tr>
<tr>
<td>No TEA</td>
<td>0</td>
<td>1,929,604</td>
<td>0</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

Note: A "-" indicates a ratio where the denominator was 0.
Sources: 2010 Census and 2010 Census Match Study Administrative Records Data.

The count ratios for TEA ranged from 58.1 percent to 98.3 percent. The Mailout/Mailback TEA had the highest count ratio at 98.3 percent, followed by Update/Leave (82.6 percent), Urban Update/Leave (82.4 percent), Remote Update Enumerate (82.3 percent), Update Enumerate (80.9 percent), Military (67.2 percent), and Remote Alaska (58.1 percent).

The match ratios were considerably lower than the count ratios. The match ratios ranged from 4.8 percent to 67.4 percent. The Mailout/Mailback (67.4 percent), Update/Leave (49.8 percent), and Urban Update/Leave (44.9 percent) TEAs had the highest match ratios; followed by Military (38.8 percent), Update Enumerate (38.1 percent), and Remote Update Enumerate (26.2 percent). Remote Alaska had the lowest match ratio at 4.8 percent.
Demographic Characteristics and Census Operations

Table 18 shows 2010 Census and administrative records person-address match ratios by race, Hispanic origin, age, sex, mode, and proxy.

Table 18: 2010 Census and Administrative Records Person-Address Match by Race, Hispanic Origin, Age, Sex, Mode, and Proxy

<table>
<thead>
<tr>
<th>Demographic Characteristics, Mode, and Proxy</th>
<th>2010 Census Person-Address Count</th>
<th>2010 Census and Administrative Records Person-Address Match</th>
<th>2010 Census and Administrative Records Person-Address Match Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Population</td>
<td>308,745,538</td>
<td>203,157,426</td>
<td>65.8</td>
</tr>
<tr>
<td>Hispanic or Latino Origin</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hispanic</td>
<td>50,477,594</td>
<td>26,854,907</td>
<td>53.2</td>
</tr>
<tr>
<td>Not Hispanic</td>
<td>258,267,944</td>
<td>176,302,519</td>
<td>68.3</td>
</tr>
<tr>
<td>Race</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>White Alone</td>
<td>223,553,254</td>
<td>155,730,544</td>
<td>69.7</td>
</tr>
<tr>
<td>Black Alone</td>
<td>38,929,315</td>
<td>21,472,380</td>
<td>55.2</td>
</tr>
<tr>
<td>American Indian or Alaska Native Alone</td>
<td>2,932,370</td>
<td>1,360,223</td>
<td>46.4</td>
</tr>
<tr>
<td>Asian Alone</td>
<td>14,674,336</td>
<td>9,831,674</td>
<td>67.0</td>
</tr>
<tr>
<td>Native Hawaiian or Other Pacific Islander Alone</td>
<td>540,064</td>
<td>287,415</td>
<td>53.2</td>
</tr>
<tr>
<td>Some Other Race Alone</td>
<td>19,107,368</td>
<td>9,052,400</td>
<td>47.4</td>
</tr>
<tr>
<td>Two or More Races</td>
<td>9,008,831</td>
<td>5,422,790</td>
<td>60.2</td>
</tr>
<tr>
<td>Age</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>0-2</td>
<td>12,019,146</td>
<td>6,685,410</td>
<td>55.6</td>
</tr>
<tr>
<td>3-17</td>
<td>62,162,321</td>
<td>39,928,333</td>
<td>64.2</td>
</tr>
<tr>
<td>18-24</td>
<td>30,646,519</td>
<td>14,815,295</td>
<td>48.3</td>
</tr>
<tr>
<td>25-44</td>
<td>82,123,330</td>
<td>51,755,207</td>
<td>63.0</td>
</tr>
<tr>
<td>45-64</td>
<td>81,499,596</td>
<td>60,092,094</td>
<td>73.7</td>
</tr>
<tr>
<td>65-74</td>
<td>21,727,578</td>
<td>16,699,927</td>
<td>76.9</td>
</tr>
<tr>
<td>75 and older</td>
<td>18,567,048</td>
<td>13,181,160</td>
<td>71.0</td>
</tr>
<tr>
<td>Sex</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Male</td>
<td>151,775,099</td>
<td>97,583,770</td>
<td>64.3</td>
</tr>
<tr>
<td>Female</td>
<td>156,970,439</td>
<td>105,573,656</td>
<td>67.3</td>
</tr>
<tr>
<td>Mode</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Nonresponse Followup</td>
<td>60,432,209</td>
<td>28,721,088</td>
<td>47.5</td>
</tr>
<tr>
<td>Mailout/Mailback</td>
<td>205,816,623</td>
<td>158,248,584</td>
<td>76.9</td>
</tr>
<tr>
<td>Other</td>
<td>42,496,706</td>
<td>16,187,754</td>
<td>38.1</td>
</tr>
<tr>
<td>Proxy</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Not by Proxy</td>
<td>295,163,226</td>
<td>200,630,386</td>
<td>68.0</td>
</tr>
<tr>
<td>By Proxy</td>
<td>13,582,312</td>
<td>2,527,040</td>
<td>18.6</td>
</tr>
</tbody>
</table>

Sources: 2010 Census and 2010 Census Match Study Administrative Records Data.
Similar to the person results, a higher percentage of non-Hispanic person-address pairs in the 2010 Census matched to administrative records relative to Hispanics. Of the 258.3 million non-Hispanics in the 2010 Census, 176.3 million or 68.3 percent matched to administrative records person-address pairs. Of the 50.5 million Hispanics in the 2010 Census, 53.2 percent matched to administrative records person-address pairs.

The match ratio ranged from 46.4 percent to 69.7 percent across race groups. Similar to the person results, the White alone population had the highest percentage of 2010 Census records that matched to administrative records person-address pairs. Of the 223.6 million persons in the 2010 Census that were classified as White alone, 155.7 million or 69.7 percent matched to administrative records person-address pairs. The Asian alone population had the second highest match ratio at 67.0 percent, followed by the Two or More Races population (60.2 percent), the Black alone population (55.2 percent), the NHPI alone population (53.2 percent), and SOR alone population (47.4 percent). The AIAN alone population had the lowest match ratio at 46.4 percent.

The person-address match ratio ranged from 48.3 percent to 76.9 percent across age groups. The person-address results follow the same pattern as the person results for age, where match ratios were higher for the older age groups and lower for younger age groups. The age group 65 to 74 had the highest match ratio (76.9 percent), followed by those aged 45 to 64 (73.7 percent). The age group 18 to 24 had the lowest match ratio at 48.3 percent. The age group 0 to 2 had the second lowest match ratio (55.6 percent).

Consistent with the person results, the match ratios for males and females were similar, and females had a slightly higher match ratio. The match ratio for females was 67.3 percent, and the match ratio for males was 64.3 percent.

Similar to the address and person results, a larger number and percentage of 2010 Census person-address pairs that responded via Mailout-Mailback matched to administrative records compared to NRFU and other modes. Of the 205.8 million persons in the 2010 Census that responded via Mailout-Mailback, 158.2 million or 76.9 percent were in administrative records. Of the 60.4 million 2010 Census person-address pairs in NRFU, 28.7 million or 47.5 percent matched to administrative records.

Similar to but even lower than the person results, a low number and percentage of 2010 Census person-address pairs that had a proxy response were in administrative records. Of the 13.6 million responses in the 2010 Census that were provided via proxy, administrative record person-address pairs matched to 2.5 million or 18.6 percent.

The preceding results indicate that direct replacement of administrative records data would result in variable coverage across states and could produce undercounts for various race, Hispanic origin, and age groups. The 2010 Census Match Study was designed to evaluate the quality and
coverage of administrative records data relative to the 2010 Census. The person-address section, as with the address and person sections, reflect different dimensions of the administrative records data to inform future planning and operational uses.

**Occupancy Status**

Table 19 shows 2010 Census and administrative records by occupancy status.

**Table 19. 2010 Census and Administrative Records by Housing Unit Status**

<table>
<thead>
<tr>
<th>Housing Unit Status</th>
<th>2010 Census Housing Unit Count</th>
<th>2010 Census and Administrative Records Same Housing Unit Status</th>
<th>2010 Census and Administrative Records Different Housing Unit Status</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Number</td>
<td>Number</td>
<td>Percent</td>
</tr>
<tr>
<td>Total</td>
<td>136,592,084</td>
<td>111,659,541</td>
<td>81.7</td>
</tr>
<tr>
<td>Occupied</td>
<td>116,716,292</td>
<td>96,083,076</td>
<td>82.3</td>
</tr>
<tr>
<td>Vacant</td>
<td>14,988,438</td>
<td>11,404,442</td>
<td>76.1</td>
</tr>
<tr>
<td>Delete</td>
<td>4,887,354</td>
<td>4,172,023</td>
<td>85.4</td>
</tr>
</tbody>
</table>

Sources: 2010 Census and 2010 Census Match Study Administrative Records Data.

There were 136.6 million addresses in the 2010 Census that had an occupancy status of occupied, vacant, or delete. Administrative records can inform whether a housing unit is occupied if there is a person in administrative records that lives at a particular housing unit. Administrative records can indicate whether a unit is not occupied if there is no person at that address in federal or commercial files. Units not occupied in administrative records may have either vacant or delete status in the 2010 Census.

Of the 136.6 million 2010 Census addresses, administrative record person-addresses pairs had the same housing unit status for 111.7 million or 81.7 percent of addresses. Of the 116.7 million housing units that were designated as occupied in the 2010 Census, administrative records indicated that 96.1 million or 82.3 percent of these addresses were occupied. Administrative records indicated that the remaining 20.6 million addresses were not occupied.

The 2010 Census had 15.0 million addresses that were designated as vacant. Administrative records indicated that 11.4 million or 76.1 percent of these 15.0 million addresses were not occupied, but that 3.6 million or 23.9 percent were occupied. In the 2010 Census, there were 4.9 million addresses that were designated as deletes. Administrative records found that 4.2 million addresses or 85.4 percent were not occupied and approximately 715,000 addresses or 14.6 percent were occupied in administrative records.

Table 20 shows 2010 Census and administrative records housing unit status by mode.

Of the occupied housing units in the 2010 Census (116.7 million), 82.3 million responded via Mailout/Mailback. For 72.1 million or 87.6 percent of these addresses, administrative records
also found the address to be occupied and 10.2 million or 12.4 percent were vacant. This percentage is lower for both the other and Nonresponse Followup mode categories. Of the 23.6 million addresses in Nonresponse Followup, administrative records indicated that 16.2 million addresses or 68.5 percent were occupied, and 7.4 million addresses or 31.5 percent were vacant.

Table 20. 2010 Census and Administrative Records Housing Unit Status by Mode

<table>
<thead>
<tr>
<th>Mode</th>
<th>2010 Census Housing Unit Count</th>
<th>Occupied in Administrative Records</th>
<th>Vacant in Administrative Records</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Number</td>
<td>Number</td>
<td>Percent</td>
</tr>
<tr>
<td></td>
<td>116,716,292</td>
<td>96,083,076</td>
<td>82.3</td>
</tr>
<tr>
<td></td>
<td>20,633,216</td>
<td>17.7</td>
<td></td>
</tr>
<tr>
<td>Nonresponse Followup</td>
<td>23,584,428</td>
<td>16,163,930</td>
<td>68.5</td>
</tr>
<tr>
<td></td>
<td>7,420,498</td>
<td>31.5</td>
<td></td>
</tr>
<tr>
<td>Mailout/Mailback</td>
<td>82,315,147</td>
<td>72,141,619</td>
<td>87.6</td>
</tr>
<tr>
<td></td>
<td>10,173,528</td>
<td>12.4</td>
<td></td>
</tr>
<tr>
<td>Other</td>
<td>10,816,717</td>
<td>7,777,527</td>
<td>71.9</td>
</tr>
<tr>
<td></td>
<td>3,039,190</td>
<td>28.1</td>
<td></td>
</tr>
</tbody>
</table>

Sources: 2010 Census and 2010 Census Match Study Administrative Records Data.

Population Count

Table 21 shows whether the population count at an address is the same, lower, or higher in administrative records relative to the 2010 Census.

Table 21. 2010 Census and Administrative Records Population Count at an Address

<table>
<thead>
<tr>
<th>Occupied Housing Units in 2010 Census and Administrative Records</th>
<th>Population Count Lower in Administrative Records</th>
<th>Population Count the Same in Administrative Records</th>
<th>Population Count Higher in Administrative Records</th>
</tr>
</thead>
<tbody>
<tr>
<td>Housing units</td>
<td>96,083,076</td>
<td>17,122,713</td>
<td>55,469,632</td>
</tr>
<tr>
<td></td>
<td>17.8</td>
<td>57.7</td>
<td>24.4</td>
</tr>
<tr>
<td></td>
<td>Number</td>
<td>Number</td>
<td>Number</td>
</tr>
<tr>
<td></td>
<td>Percent</td>
<td>Percent</td>
<td>Percent</td>
</tr>
<tr>
<td></td>
<td>23,490,731</td>
<td>24.4</td>
<td></td>
</tr>
</tbody>
</table>

Sources: 2010 Census and 2010 Census Match Study Administrative Records Data.

Of the 116.7 million 2010 Census occupied units, 96.1 million were also designated as occupied in administrative records. Of these, 55.5 million or 57.7 percent of the 2010 Census and administrative records addresses had the same population count. For 17.1 million or 17.8 percent of addresses, administrative records had a lower population count relative to the 2010 Census. For 23.5 million or 24.4 percent of addresses, administrative records had a higher population count relative to the 2010 Census.

Table 22 shows the difference in the population counts when administrative records had a higher or lower population count at an address relative to the 2010 Census.
Table 22. Difference in Population Count, when Administrative Records had a Higher or Lower Population Count Relative to the 2010 Census

<table>
<thead>
<tr>
<th>Difference in Population Count, when Administrative Records had a Higher or Lower Population Count Relative to 2010 Census</th>
<th>Total Housing Units Occupied in Both the 2010 Census and Administrative Records, where Administrative Records had Higher or Lower Population Count</th>
<th>Population Count Lower in Administrative Records</th>
<th>Population Count Higher in Administrative Records</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number</td>
<td>Percent</td>
<td>Number</td>
<td>Percent</td>
</tr>
<tr>
<td>Total</td>
<td>40,613,444</td>
<td>100.0</td>
<td>17,122,713</td>
</tr>
<tr>
<td>1</td>
<td>25,851,974</td>
<td>63.7</td>
<td>10,947,832</td>
</tr>
<tr>
<td>2</td>
<td>8,329,611</td>
<td>20.5</td>
<td>3,475,349</td>
</tr>
<tr>
<td>3</td>
<td>3,399,243</td>
<td>8.4</td>
<td>1,568,248</td>
</tr>
<tr>
<td>4</td>
<td>1,518,342</td>
<td>3.7</td>
<td>663,782</td>
</tr>
<tr>
<td>5</td>
<td>694,777</td>
<td>1.7</td>
<td>266,772</td>
</tr>
<tr>
<td>6 or More</td>
<td>819,497</td>
<td>2.0</td>
<td>200,730</td>
</tr>
</tbody>
</table>

Sources: 2010 Census and 2010 Census Match Study Administrative Records Data.

When administrative records had either a lower or higher number of people at an address relative to the 2010 Census, for the majority of addresses, the administrative records population count was either higher or lower by one person. Of the 17.1 million records that administrative data had a lower population count relative to the 2010 Census, 10.9 million or 63.9 percent of these records were lower by one person. Similarly, of the 23.5 million records where administrative data had a higher population count, 63.4 percent of these records were higher by one person. About 20 percent of the records were either lower or higher by two persons. About 8 percent of the records were either lower or higher by three persons, and the percentages were successively lower for four, five, and six or more persons. Future research is needed to explore the sources and reasons for the count differences.

5.4 Demographic Quality and Coverage Assessment

Since agreements with commercial data vendors prohibit direct comparisons of data across sources, commercial file names will not be used when presenting analysis comparing the commercial data sources. Instead, commercial data files will be called commercial file 1, commercial file 2, etc. in this section. Some commercial data files do not have data for Hispanic origin, race, or sex.

Quality Assessment

This section discusses the quality of demographic characteristics in the federal and commercial files, using 2010 Census unedited demographic characteristics as the gold standard for comparison purposes. For each data source in the 2010 Census Match Study, persons were matched to the 2010 Census by PIK and then responses from the 2010 Census were compared to the demographic data provided by federal agencies and commercial data vendors.
In addition, Numident and previous census records’ demographic data were evaluated, specifically the Census 2000 and 2001-2009 ACS data as these are large sources of demographic data that could be used in conjunction with other administrative data to assist in census operations.\textsuperscript{24} Tax files are not included in this analysis as they do not contain demographic characteristics, and other federal files only include some demographic characteristics.

**Quality of Hispanic Origin Data in Administrative Records**

Table 23 shows the number and percentage of persons that had the same Hispanic origin response in administrative records and the 2010 Census by administrative records source. While the terminology “response” is used in this section, the data from some sources were modeled for Hispanic origin and race and therefore were not based on a response from a resident of the household.

**Table 23. Number and Percentage of Administrative Records Hispanic Origin Response Data that Matched to the 2010 Census**

<table>
<thead>
<tr>
<th>2010 Census and Administrative Records Hispanic Origin Response Match by Source File</th>
<th>Hispanic</th>
<th></th>
<th></th>
<th>Not Hispanic</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Number</td>
<td>Percent</td>
<td></td>
<td>Number</td>
<td>Percent</td>
<td></td>
</tr>
<tr>
<td>Federal Files</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Previous Census Records</td>
<td>18,137,918</td>
<td>93.1</td>
<td></td>
<td>162,270,334</td>
<td>99.4</td>
<td></td>
</tr>
<tr>
<td>Numident</td>
<td>18,898,237</td>
<td>54.2</td>
<td></td>
<td>215,259,972</td>
<td>99.7</td>
<td></td>
</tr>
<tr>
<td>HUD CHUMS</td>
<td>507,655</td>
<td>80.0</td>
<td></td>
<td>3,987,563</td>
<td>98.5</td>
<td></td>
</tr>
<tr>
<td>HUD PIC</td>
<td>1,009,383</td>
<td>86.0</td>
<td></td>
<td>4,405,539</td>
<td>98.1</td>
<td></td>
</tr>
<tr>
<td>HUD TRACS</td>
<td>14,181</td>
<td>78.6</td>
<td></td>
<td>105,010</td>
<td>98.6</td>
<td></td>
</tr>
<tr>
<td>TANF</td>
<td>220,988</td>
<td>70.7</td>
<td></td>
<td>1,659,036</td>
<td>98.3</td>
<td></td>
</tr>
<tr>
<td>MEDB</td>
<td>812,807</td>
<td>29.4</td>
<td></td>
<td>37,825,607</td>
<td>99.9</td>
<td></td>
</tr>
<tr>
<td>Commercial Files</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Commercial File 1</td>
<td>8,260,777</td>
<td>83.5</td>
<td></td>
<td>94,604,335</td>
<td>98.2</td>
<td></td>
</tr>
<tr>
<td>Commercial File 2</td>
<td>11,868,492</td>
<td>77.3</td>
<td></td>
<td>140,335,009</td>
<td>98.0</td>
<td></td>
</tr>
<tr>
<td>Commercial File 3</td>
<td>9,206,375</td>
<td>80.2</td>
<td></td>
<td>114,014,452</td>
<td>98.0</td>
<td></td>
</tr>
<tr>
<td>Commercial File 4</td>
<td>4,510,662</td>
<td>77.1</td>
<td></td>
<td>50,604,881</td>
<td>97.9</td>
<td></td>
</tr>
</tbody>
</table>

Sources: 2010 Census and 2010 Census Match Study Administrative Records Data.

The quality of data for non-Hispanics in federal files was considerably higher compared to Hispanics. The quality range was also less variable for non-Hispanics compared to Hispanics. The quality of Hispanic origin data in federal files ranged from 29.4 percent to 93.1 percent for the Hispanic population and 98.1 percent to 99.9 percent for the non-Hispanic population.

\textsuperscript{24} For the 2010 Census, previous census records (Census 2000 and 2001-2009 ACS data) were used in race and Hispanic origin item imputation processes.
Previous census data had the highest match for Hispanic response data in federal sources at 93.1 percent, followed by HUD PIC (86.0 percent) and HUD CHUMS (80.0 percent). MEDB had the lowest percentage of Hispanic response data that matched the 2010 Census at 29.4 percent.

The percentage of data for Hispanics in commercial files that matched to the 2010 Census ranged from 77.1 percent to 83.5 percent. For Hispanics, commercial file 4 had the lowest percentage that matched to the 2010 Census and commercial file 1 had the highest percentage that matched. Similar to federal files, commercial sources also had high quality response data for non-Hispanics.

**Quality of Race Responses in Administrative Records**

Table 24 shows the percentage of federal and commercial race response data that matched to the 2010 Census (see Appendix 2 for numbers).

**Table 24. Percentage of Administrative Records Race Response Data that Matched to the 2010 Census**

<table>
<thead>
<tr>
<th>2010 Census and Administrative Records Race Response Match by Source File</th>
<th>White Alone</th>
<th>Black Alone</th>
<th>American Indian or Alaska Native Alone</th>
<th>Asian Alone</th>
<th>Native Hawaiian or Other Pacific Islander Alone</th>
<th>Some Other Race Alone</th>
<th>Two or More Races</th>
</tr>
</thead>
<tbody>
<tr>
<td>Federal Files</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Previous Census Records</td>
<td>96.8</td>
<td>96.2</td>
<td>63.2</td>
<td>94.1</td>
<td>59.7</td>
<td>54.9</td>
<td>36.3</td>
</tr>
<tr>
<td>Numident</td>
<td>99.1</td>
<td>98.3</td>
<td>51.4</td>
<td>84.3</td>
<td>74.4</td>
<td>17.7</td>
<td>N/A</td>
</tr>
<tr>
<td>IHS</td>
<td>N/A</td>
<td>N/A</td>
<td>97.6</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>HUD CHUMS</td>
<td>98.0</td>
<td>87.4</td>
<td>24.6</td>
<td>65.0</td>
<td>46.9</td>
<td>N/A</td>
<td>3.6</td>
</tr>
<tr>
<td>HUD PIC</td>
<td>97.2</td>
<td>96.3</td>
<td>41.7</td>
<td>89.3</td>
<td>62.5</td>
<td>N/A</td>
<td>6.9</td>
</tr>
<tr>
<td>HUD TRACS</td>
<td>96.1</td>
<td>95.4</td>
<td>46.9</td>
<td>87.3</td>
<td>37.0</td>
<td>14.5</td>
<td>9.7</td>
</tr>
<tr>
<td>TANF</td>
<td>97.6</td>
<td>95.9</td>
<td>73.0</td>
<td>80.9</td>
<td>76.0</td>
<td>N/A</td>
<td>12.8</td>
</tr>
<tr>
<td>MEDB</td>
<td>99.0</td>
<td>97.9</td>
<td>49.1</td>
<td>58.0</td>
<td>N/A</td>
<td>14.1</td>
<td>N/A</td>
</tr>
<tr>
<td>Commercial Files</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Commercial File 1</td>
<td>97.9</td>
<td>43.6</td>
<td>N/A</td>
<td>85.2</td>
<td>14.3</td>
<td>3.0</td>
<td>N/A</td>
</tr>
<tr>
<td>Commercial File 2</td>
<td>97.8</td>
<td>37.3</td>
<td>6.4</td>
<td>73.6</td>
<td>19.2</td>
<td>1.1</td>
<td>N/A</td>
</tr>
<tr>
<td>Commercial File 3</td>
<td>94.9</td>
<td>61.1</td>
<td>13.2</td>
<td>79.7</td>
<td>17.0</td>
<td>3.4</td>
<td>N/A</td>
</tr>
<tr>
<td>Commercial File 4</td>
<td>94.7</td>
<td>58.2</td>
<td>8.6</td>
<td>79.8</td>
<td>16.6</td>
<td>3.4</td>
<td>N/A</td>
</tr>
</tbody>
</table>

Note: N/A in tables in this report indicates that data were not available for a demographic group.
Sources: 2010 Census and 2010 Census Match Study Administrative Records Data.

The White alone population had the highest quality response data in both federal and commercial files relative to other race groups. In federal files, the quality of race response data ranged from 96.1 percent to 99.1 percent for the White alone population. Commercial files had a similar though slightly lower range, from 94.7 percent to 97.9 percent. Among the federal files, Numident had the highest percentage of White alone response data that matched to the 2010 Census (99.1 percent), followed by MEDB (99.0 percent), and HUD CHUMS (98.0 percent). HUD TRACS had the lowest percentage match for White alone response at 96.1 percent. For the
commercial files, commercial file 4 had the lowest percentage match (94.7 percent) while commercial file 1 had the highest match (97.9 percent) for the White alone response.

The quality of response data was lower for the Black alone population relative to the White alone population in federal data. The quality of the race response data for the Black alone population ranged from 87.4 percent to 98.3 percent. The commercial files had a considerably lower percentage of the Black alone population that matched to the 2010 Census relative to the White alone population, a range from 37.3 percent to 61.1 percent. Among federal files, similar to the White alone population, the Numident had the highest percentage match for the Black alone population at 98.3 percent. This was followed by MEDB (97.9 percent) and HUD PIC (96.3 percent). HUD CHUMS had the lowest percentage Black alone response match to the 2010 Census (87.4 percent). Commercial file 2 had the lowest percentage match for the Black alone population, and commercial file 3 had the highest percentage that matched.

The quality of federal file race response data was considerably lower for the AIAN alone population compared to the White alone and Black alone populations. The percentage of AIAN alone race responses that matched to the 2010 Census in the federal files ranged from 24.6 percent to 97.6 percent. IHS and TANF were the two federal files that had a relatively high percentage of AIAN alone responses that matched, 97.6 percent and 73.0 percent respectively, whereas 63.2 percent of the responses in previous census records matched, and 51.4 percent or fewer of the responses for the remaining federal data sources matched the 2010 Census. Similar to the Black alone population, HUD CHUMS had the lowest percentage of AIAN matches (24.6 percent). Commercial file 1 did not have any data on the AIAN population. Among the commercial files that had data on this population, the percentages of responses that matched the 2010 Census were low, 6.4 percent to 13.2 percent. Similar to the Black alone population, commercial file 2 had the lowest percentage of AIAN alone responses that matched, and commercial file 3 had the highest.

For the federal files, the Asian alone population had higher percentages of race responses that matched the 2010 Census relative to the AIAN alone population, but lower percentages compared to the White alone and Black alone populations, 58.0 percent to 94.1 percent. Previous census records had the highest percentage match (94.1 percent), followed by HUD PIC (89.3 percent) and HUD TRACS (87.3 percent). MEDB had the lowest percentage of Asian alone responses that matched at 58.0 percent. For commercial files, the Asian alone population had higher percentages that matched the 2010 Census relative to both the Black alone and AIAN alone populations, but lower matches relative to the White alone population. The percentage of commercial data responses that matched the 2010 Census for the Asian alone population ranged from 73.6 percent to 85.2 percent. Similar to the Black alone and AIAN alone populations, commercial file 2 had the lowest match for the Asian alone population. Similar to the White alone population, commercial file 1 had the highest match.
For the NHPI alone population, 59 percent or higher of the responses in four of the seven federal datasets matched the 2010 Census. TANF had the highest percentage of NHPI alone responses that matched (76.0 percent), followed by the Numident (74.4 percent), HUD PIC (62.5 percent), and previous census records (59.7 percent). HUD TRACS had the lowest percentage of responses that matched for this population at 37.0 percent. The percentage of responses that matched in the commercial files for the NHPI alone community was considerably lower than the White alone, Black alone, and Asian alone populations, but higher than the AIAN alone population. For the NHPI alone population, 14.3 percent to 19.2 percent of the responses in the commercial files matched to the 2010 Census. Commercial file 1 had the lowest match and commercial file 2 had the highest match.

Only four of the seven federal files had a race category equivalent to SOR. Of these four data sources, MEDB had the lowest percentage of SOR alone responses that matched to the 2010 Census (14.1 percent), and previous census records had the highest percentage (54.9 percent). About 14.5 percent of HUD TRACS SOR alone responses matched to the 2010 Census and the Numident matched to 17.7 percent. These match percentages were the second lowest matches across all race groups for the federal data. In the commercial files, 1.1 percent to 3.4 percent of the SOR alone responses matched to the 2010 Census. This was the lowest match percentage of all the race groups represented in the commercial files. Similar to the majority of race groups, commercial file 2 had the lowest percentage of SOR alone responses that matched to the 2010 Census. Commercial file 3 and commercial file 4 had the highest percentages that matched.

The multiracial population had the lowest percentage of responses that matched in the federal files to the 2010 Census relative to other race groups. Of the five federal files that had data on the multiracial population, previous census records had the highest percentage that matched at 36.3 percent. HUD CHUMS had the lowest percentage that matched at 3.6 percent. TANF, HUD TRACS, and HUD PIC matched the 2010 Census multiracial population at 12.8 percent, 9.7 percent, and 6.9 percent respectively. The commercial files did not classify individuals as multiracial.

**Quality of Age Responses in Administrative Records**

Table 25 shows the percentage of federal and commercial age response data that matched to the 2010 Census overall and by age group (see Appendix 3 for numbers). The percentage of records that matched the age data in the 2010 Census was 95.2 percent or higher for all federal source files except HUD CHUMS. MEDB had the highest percentage match on age at 98.5 percent, followed by the Numident (97.9 percent) and SSS (97.8 percent). HUD CHUMS had the lowest age response match at 24.4 percent. The match is low because the HUD CHUMS file only included persons’ year of birth, while the other files provided date of birth which more accurately can be matched to the age of persons in the 2010 Census. Relative to the federal files, the commercial files had lower percentages of age responses that matched to the 2010 Census.
Commercial file 4 had the highest percentage of age responses that matched (90.5 percent) whereas commercial file 1 had the lowest percentage match (79.0 percent).

Table 25. Percentage of Administrative Records Age Response Data that Matched to the 2010 Census

<table>
<thead>
<tr>
<th>2010 Census and Administrative Records Age Response Match by Source</th>
<th>2010 Census</th>
<th>0-2</th>
<th>3-17</th>
<th>18-24</th>
<th>25-44</th>
<th>45-64</th>
<th>65-74</th>
<th>75 and older</th>
</tr>
</thead>
<tbody>
<tr>
<td>Federal Files</td>
<td>Total</td>
<td>95.7</td>
<td>85.7</td>
<td>94.7</td>
<td>95.3</td>
<td>95.6</td>
<td>96.1</td>
<td>96.5</td>
</tr>
<tr>
<td>Previous Census Records</td>
<td>N/A</td>
<td>97.9</td>
<td>97.6</td>
<td>98.0</td>
<td>97.8</td>
<td>98.0</td>
<td>98.1</td>
<td>98.6</td>
</tr>
<tr>
<td>Numident</td>
<td>N/A</td>
<td>96.6</td>
<td>95.3</td>
<td>96.3</td>
<td>96.6</td>
<td>97.0</td>
<td>96.8</td>
<td>96.3</td>
</tr>
<tr>
<td>IHS</td>
<td>N/A</td>
<td>24.4</td>
<td>N/A</td>
<td>N/A</td>
<td>19.1</td>
<td>24.5</td>
<td>25.0</td>
<td>25.9</td>
</tr>
<tr>
<td>HUD CHUMS</td>
<td>N/A</td>
<td>97.0</td>
<td>95.8</td>
<td>96.9</td>
<td>97.1</td>
<td>97.4</td>
<td>97.3</td>
<td>97.0</td>
</tr>
<tr>
<td>HUD PIC</td>
<td>N/A</td>
<td>96.9</td>
<td>96.5</td>
<td>96.7</td>
<td>97.1</td>
<td>97.1</td>
<td>96.9</td>
<td>97.4</td>
</tr>
<tr>
<td>HUD TRAC</td>
<td>N/A</td>
<td>95.2</td>
<td>97.0</td>
<td>97.3</td>
<td>97.6</td>
<td>97.0</td>
<td>95.6</td>
<td>92.3</td>
</tr>
<tr>
<td>SSS</td>
<td>N/A</td>
<td>97.8</td>
<td>N/A</td>
<td>N/A</td>
<td>98.0</td>
<td>97.7</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>TANF</td>
<td>N/A</td>
<td>96.7</td>
<td>96.3</td>
<td>96.7</td>
<td>97.0</td>
<td>97.2</td>
<td>96.4</td>
<td>94.4</td>
</tr>
<tr>
<td>MEDB</td>
<td>N/A</td>
<td>98.5</td>
<td>97.5</td>
<td>96.0</td>
<td>97.5</td>
<td>98.0</td>
<td>98.1</td>
<td>98.8</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>2010 Census and Administrative Records Age Response Match by Source</th>
<th>2010 Census</th>
<th>0-2</th>
<th>3-17</th>
<th>18-24</th>
<th>25-44</th>
<th>45-64</th>
<th>65-74</th>
<th>75 and older</th>
</tr>
</thead>
<tbody>
<tr>
<td>Commercial Files</td>
<td>Total</td>
<td>79.0</td>
<td>0.3</td>
<td>6.4</td>
<td>77.2</td>
<td>78.6</td>
<td>79.5</td>
<td>79.2</td>
</tr>
<tr>
<td>Commercial 1</td>
<td>N/A</td>
<td>88.9</td>
<td>16.8</td>
<td>59.3</td>
<td>83.3</td>
<td>87.6</td>
<td>90.1</td>
<td>91.1</td>
</tr>
<tr>
<td>Commercial 2</td>
<td>N/A</td>
<td>89.1</td>
<td>N/A</td>
<td>N/A</td>
<td>81.4</td>
<td>88.6</td>
<td>90.2</td>
<td>90.8</td>
</tr>
<tr>
<td>Commercial 3</td>
<td>N/A</td>
<td>90.5</td>
<td>N/A</td>
<td>N/A</td>
<td>85.4</td>
<td>90.3</td>
<td>91.5</td>
<td>92.2</td>
</tr>
<tr>
<td>Commercial 4</td>
<td>N/A</td>
<td>88.6</td>
<td>N/A</td>
<td>3.1</td>
<td>79.1</td>
<td>90.3</td>
<td>88.4</td>
<td>87.5</td>
</tr>
<tr>
<td>Commercial 5</td>
<td>N/A</td>
<td>80.9</td>
<td>71.4</td>
<td>0.3</td>
<td>75.4</td>
<td>82.0</td>
<td>80.9</td>
<td>84.2</td>
</tr>
<tr>
<td>Commercial 6</td>
<td>N/A</td>
<td>87.2</td>
<td>N/A</td>
<td>N/A</td>
<td>78.6</td>
<td>88.1</td>
<td>87.5</td>
<td>87.1</td>
</tr>
<tr>
<td>Commercial 7</td>
<td>N/A</td>
<td>90.4</td>
<td>20.0</td>
<td>73.5</td>
<td>92.0</td>
<td>90.6</td>
<td>90.3</td>
<td>90.7</td>
</tr>
</tbody>
</table>

Note: N/A indicates that data were not available for a demographic group.

Sources: 2010 Census and 2010 Census Match Study Administrative Records Data.

Across the federal files, the quality of age response data showed some slight variation according to age group. Where differences existed was in the presence of age response data. The HUD CHUMS file did not include anyone under the age of 18, MEDB included relatively few persons under 18, and the SSS file only included data on those between the ages of 18 to 25. Similarly, the commercial records had relatively few persons under the age of 18 and had lower match rates for those who were included. Commercial file 2 included more people under age 18 but the quality of the age data was lower relative to other age groups.

Quality of Sex Responses in Administrative Records

Table 26 shows the number and percentage of federal and commercial sex response data that matched to the 2010 Census.
Table 26. Number and Percentage of Administrative Records Sex Response Data that Matched to the 2010 Census

<table>
<thead>
<tr>
<th>2010 Census and Administrative Records Sex Response Match by Source File</th>
<th>Female</th>
<th>Male</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Number</td>
<td>Percent</td>
</tr>
<tr>
<td>Federal Files</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Previous Census Records</td>
<td>99,582,513</td>
<td>99.5</td>
</tr>
<tr>
<td>Numident</td>
<td>132,710,367</td>
<td>99.4</td>
</tr>
<tr>
<td>HUD CHUMS</td>
<td>2,310,839</td>
<td>98.1</td>
</tr>
<tr>
<td>HUD PIC</td>
<td>3,742,607</td>
<td>99.0</td>
</tr>
<tr>
<td>HUD TRACS</td>
<td>1,341,994</td>
<td>98.9</td>
</tr>
<tr>
<td>IHS</td>
<td>1,117,176</td>
<td>99.4</td>
</tr>
<tr>
<td>MEDB</td>
<td>23,691,186</td>
<td>99.6</td>
</tr>
<tr>
<td>SSS</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>TANF</td>
<td>1,298,748</td>
<td>99.1</td>
</tr>
<tr>
<td>Commercial Files</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Commercial File 1</td>
<td>63,605,178</td>
<td>98.8</td>
</tr>
<tr>
<td>Commercial File 2</td>
<td>81,263,837</td>
<td>98.6</td>
</tr>
<tr>
<td>Commercial File 3</td>
<td>67,065,482</td>
<td>97.0</td>
</tr>
<tr>
<td>Commercial File 4</td>
<td>31,208,537</td>
<td>97.0</td>
</tr>
<tr>
<td>Commercial File 5</td>
<td>76,293,351</td>
<td>97.2</td>
</tr>
<tr>
<td>Commercial File 6</td>
<td>412,740</td>
<td>95.6</td>
</tr>
<tr>
<td>Commercial File 7</td>
<td>50,177,060</td>
<td>97.2</td>
</tr>
</tbody>
</table>

Note: N/A indicates that data were not available for a demographic group.
Sources: 2010 Census and 2010 Census Match Study Administrative Records Data.

The quality of sex response data ranged from 94.7 percent to 100.0 percent across both federal and commercial files for both sexes. Among the federal administrative files, HUD PIC had the lowest percentage that matched for males at 97.9 percent. SSS had the highest match rate for males at 100.0 percent. HUD CHUMS had the lowest percentage that matched for females at 98.1 percent, and MEDB had the highest at 99.6 percent. For the commercial administrative files, commercial file 6 had the lowest percentage match for both males at 94.7 percent and females at 95.6 percent. Commercial file 2 had the highest match for males at 98.6 percent, and commercial file 1 had the highest match for females at 98.8 percent.

**Demographic Coverage Assessment**

This section discusses demographic characteristic coverage of the 2010 Census by the federal and commercial files, including the Numident and previous census records. Persons in the 2010 Census were matched by PIK to each data source to determine if the federal or commercial files provided any demographic data for that person on Hispanic origin, race, age, and sex regardless of the quality. This assessment indicates whether data are present for demographic groups in the 2010 Census, not whether the demographic data are the same in the 2010 Census and administrative records.
Table 27 shows whether demographic data were present in administrative records by demographic group. Administrative records had Hispanic origin response data for 278.0 million persons in the 2010 Census (90.1 percent). A higher percentage of non-Hispanics had Hispanic origin response data in administrative records relative to Hispanics. Of the 258.3 million non-Hispanics in the 2010 Census, administrative records had Hispanic origin response data for 238.2 million or 92.2 percent. Of the 50.5 million Hispanics in the 2010 Census, 39.8 million or 78.9 percent had Hispanic origin response data in administrative records.

Table 27. Coverage of 2010 Census Demographic Data by Administrative Records

<table>
<thead>
<tr>
<th>Demographic Characteristics</th>
<th>2010 Census</th>
<th>Coverage of 2010 Census Demographic Data by Administrative Records</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Number</td>
<td>Percent</td>
</tr>
<tr>
<td>Total Population</td>
<td>308,745,538</td>
<td>100.0</td>
</tr>
<tr>
<td>Hispanic or Latino Origin</td>
<td>308,745,538</td>
<td>100.0</td>
</tr>
<tr>
<td>Hispanic</td>
<td>50,477,594</td>
<td>100.0</td>
</tr>
<tr>
<td>Not Hispanic</td>
<td>258,267,944</td>
<td>100.0</td>
</tr>
<tr>
<td>Race</td>
<td>308,745,538</td>
<td>100.0</td>
</tr>
<tr>
<td>White Alone</td>
<td>223,553,254</td>
<td>100.0</td>
</tr>
<tr>
<td>Black Alone</td>
<td>38,929,315</td>
<td>100.0</td>
</tr>
<tr>
<td>American Indian or Alaska Native Alone</td>
<td>2,932,370</td>
<td>100.0</td>
</tr>
<tr>
<td>Asian Alone</td>
<td>14,674,336</td>
<td>100.0</td>
</tr>
<tr>
<td>Native Hawaiian or Other Pacific Islander Alone</td>
<td>540,064</td>
<td>100.0</td>
</tr>
<tr>
<td>Some Other Race Alone</td>
<td>19,107,368</td>
<td>100.0</td>
</tr>
<tr>
<td>Two or More Races</td>
<td>9,008,831</td>
<td>100.0</td>
</tr>
<tr>
<td>Age</td>
<td>308,745,538</td>
<td>100.0</td>
</tr>
<tr>
<td>0-2</td>
<td>12,019,146</td>
<td>100.0</td>
</tr>
<tr>
<td>3-17</td>
<td>62,162,321</td>
<td>100.0</td>
</tr>
<tr>
<td>18-24</td>
<td>30,646,519</td>
<td>100.0</td>
</tr>
<tr>
<td>25-44</td>
<td>82,123,330</td>
<td>100.0</td>
</tr>
<tr>
<td>45-64</td>
<td>81,499,596</td>
<td>100.0</td>
</tr>
<tr>
<td>65-74</td>
<td>21,727,578</td>
<td>100.0</td>
</tr>
<tr>
<td>75 and older</td>
<td>18,567,048</td>
<td>100.0</td>
</tr>
<tr>
<td>Sex</td>
<td>308,745,538</td>
<td>100.0</td>
</tr>
<tr>
<td>Male</td>
<td>151,775,099</td>
<td>100.0</td>
</tr>
<tr>
<td>Female</td>
<td>156,970,439</td>
<td>100.0</td>
</tr>
</tbody>
</table>

Sources: 2010 Census and 2010 Census Match Study Administrative Records Data.

Data on race were available for 239.5 million or 77.6 percent of 2010 Census respondents. Administrative records provided the greatest level of race data coverage for the White alone population and the lowest level of race data coverage for the SOR alone population in the 2010
Census. Of the 223.6 million persons classified as White alone in the 2010 Census, 181 million or 81.0 percent had race data in administrative records. The next highest level of race data coverage was for the Black alone population (78.2 percent), followed by AIAN alone (76.9 percent), Asian alone (73.9 percent), NHPI alone (69.9 percent), and the Two or More Races population (63.7 percent). Administrative records contained race data for just under half (46.1 percent) of the SOR alone population.

Administrative records provided coverage of age data for 278.1 million or 90.1 percent of all persons on the 2010 Census. Coverage by age group in the 2010 Census ranged from 84.9 percent to 94.3 percent with older age groups more likely to have age data present in administrative records relative to younger age groups. Age coverage by administrative records was greatest for those in the 65 to 74 age group (94.3 percent), followed by 75 and older (93.5 percent), 45 to 64 (92.8 percent), 3 to 17 (90.9), 0 to 2 (89.6 percent), and 25 to 44 (86.8 percent) age groups. The age group with the lowest coverage was those aged 18 to 24 at 84.9 percent.

Sex data were available in the administrative records for 278.0 million or 90.1 percent of all persons on the 2010 Census. Coverage was slightly higher for females in the 2010 Census than for males. For females in the 2010 Census, 90.8 percent had data on sex in administrative records. For males in the 2010 Census, 89.3 percent also had data on sex in administrative records.

**Coverage by Mode by Demographic Group**

Table 28 shows whether Hispanic origin data were present in administrative records by mode.

### Table 28. Coverage of 2010 Hispanic Origin Data by Administrative Records Hispanic Origin Response Data by Mode

<table>
<thead>
<tr>
<th>Coverage of 2010 Hispanic Origin Data by Administrative Records Hispanic Origin Response Data</th>
<th>2010 Census</th>
<th>Administrative Records</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Number</td>
<td>Percent</td>
</tr>
<tr>
<td>NRFU</td>
<td>60,432,209</td>
<td>100.0</td>
</tr>
<tr>
<td>Hispanic</td>
<td>12,474,326</td>
<td>100.0</td>
</tr>
<tr>
<td>Not Hispanic</td>
<td>47,957,883</td>
<td>100.0</td>
</tr>
<tr>
<td>Mailout/Mailback</td>
<td>205,816,623</td>
<td>100.0</td>
</tr>
<tr>
<td>Hispanic</td>
<td>28,619,508</td>
<td>100.0</td>
</tr>
<tr>
<td>Not Hispanic</td>
<td>177,197,115</td>
<td>100.0</td>
</tr>
<tr>
<td>Other</td>
<td>42,496,706</td>
<td>100.0</td>
</tr>
<tr>
<td>Hispanic</td>
<td>9,383,760</td>
<td>100.0</td>
</tr>
<tr>
<td>Not Hispanic</td>
<td>33,112,946</td>
<td>100.0</td>
</tr>
</tbody>
</table>

Sources: 2010 Census and 2010 Census Match Study Administrative Records Data.
Administrative data had Hispanic origin response data for 96.6 percent of persons whose response was obtained via Mailout/Mailback in the 2010 Census. There were 80.9 percent of NRFU respondents in the 2010 Census that had Hispanic origin response data in administrative records. Administrative records covered about 10 percent more of the non-Hispanic population compared to the Hispanic population regardless of mode.

Table 29 shows whether race data were present in administrative records by mode.

**Table 29. Coverage of 2010 Race Data by Administrative Records Race Response Data by Mode**

<table>
<thead>
<tr>
<th>Coverage of 2010 Race Data by Administrative Records Race Response Data</th>
<th>2010 Census</th>
<th>Administrative Records</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Number</td>
<td>Percent</td>
</tr>
<tr>
<td>NRFU</td>
<td>60,432,209</td>
<td>100.0</td>
</tr>
<tr>
<td>White Alone</td>
<td>38,193,839</td>
<td>100.0</td>
</tr>
<tr>
<td>Black Alone</td>
<td>9,665,248</td>
<td>100.0</td>
</tr>
<tr>
<td>American Indian or Alaska Native Alone</td>
<td>614,416</td>
<td>100.0</td>
</tr>
<tr>
<td>Asian Alone</td>
<td>2,935,599</td>
<td>100.0</td>
</tr>
<tr>
<td>Native Hawaiian or Other Pacific Islander Alone</td>
<td>170,657</td>
<td>100.0</td>
</tr>
<tr>
<td>Some Other Race Alone</td>
<td>6,574,514</td>
<td>100.0</td>
</tr>
<tr>
<td>Two or More Races</td>
<td>2,277,936</td>
<td>100.0</td>
</tr>
<tr>
<td>Mailout/Mailback</td>
<td>205,816,623</td>
<td>100.0</td>
</tr>
<tr>
<td>White Alone</td>
<td>158,738,870</td>
<td>100.0</td>
</tr>
<tr>
<td>Black Alone</td>
<td>22,179,559</td>
<td>100.0</td>
</tr>
<tr>
<td>American Indian or Alaska Native Alone</td>
<td>1,367,303</td>
<td>100.0</td>
</tr>
<tr>
<td>Asian Alone</td>
<td>9,415,785</td>
<td>100.0</td>
</tr>
<tr>
<td>Native Hawaiian or Other Pacific Islander Alone</td>
<td>234,376</td>
<td>100.0</td>
</tr>
<tr>
<td>Some Other Race Alone</td>
<td>8,587,123</td>
<td>100.0</td>
</tr>
<tr>
<td>Two or More Races</td>
<td>5,293,607</td>
<td>100.0</td>
</tr>
<tr>
<td>Other</td>
<td>42,496,706</td>
<td>100.0</td>
</tr>
<tr>
<td>White Alone</td>
<td>26,620,545</td>
<td>100.0</td>
</tr>
<tr>
<td>Black Alone</td>
<td>7,084,508</td>
<td>100.0</td>
</tr>
<tr>
<td>American Indian or Alaska Native Alone</td>
<td>950,651</td>
<td>100.0</td>
</tr>
<tr>
<td>Asian Alone</td>
<td>2,322,952</td>
<td>100.0</td>
</tr>
<tr>
<td>Native Hawaiian or Other Pacific Islander Alone</td>
<td>135,031</td>
<td>100.0</td>
</tr>
<tr>
<td>Some Other Race Alone</td>
<td>3,945,731</td>
<td>100.0</td>
</tr>
<tr>
<td>Two or More Races</td>
<td>1,437,288</td>
<td>100.0</td>
</tr>
</tbody>
</table>

Sources: 2010 Census and 2010 Census Match Study Administrative Records Data.

Data on race collected via Mailout/Mailback was most likely to be covered by administrative records (84.5 percent), followed by NRFU (67.2 percent), and other response operations (58.6 percent).
All race categories had the highest levels of coverage in Mailout-Mailback mode. Administrative records race response coverage for 2010 Census respondents in Mailout-Mailback ranged from a high of 87.2 percent for the Black alone population to a low of 56.7 percent for SOR alone. Persons reporting White alone via Mailout-Mailback had the second highest administrative records race coverage (86.5 percent), followed by AIAN alone (81.7 percent), NHPI alone (81.5 percent), Asian alone (80.9), and Two or More Races (67.8 percent).

The coverage rate for race responses collected via NRFU was highest for AIAN alone. Of the approximately 614,000 persons who reported AIAN alone in NRFU, administrative records had race data for approximately 466,000 or 75.9 percent of respondents. The White alone population had the next highest coverage rate (71.4 percent), followed by the Black alone (70.6 percent), NHPI alone (65.3 percent), Asian alone (62.6 percent), and Two or More Races (62.2 percent) populations in NRFU. The SOR alone population had the lowest coverage rate in NRFU at 40.4 percent.

Table 30 shows whether age data were present in administrative records by mode.

Of 2010 Census respondents with a PIK in Mailout-Mailback, 96.6 percent had age data in administrative records. Age response coverage was lower for NRFU (80.9 percent) and other modes (71.4 percent). Among NRFU respondents, the age groups 3 to 17 and 0 to 2 had the highest age response coverage in administrative records at 84.8 percent and 83.3 percent respectively. This was followed by age groups 45 to 64 (82.3 percent), 65 to 74 (81.5 percent), and 75 and older (80.3 percent). Administrative record coverage for age data was lowest in NRFU for the 18 to 24 (76.4 percent) and 25 to 44 (78.4 percent) age groups.
**Table 30. Coverage of 2010 Age Data by Administrative Records Age Response Data by Mode**

<table>
<thead>
<tr>
<th>Coverage of 2010 Age Data by Administrative Records Age Response Data</th>
<th>2010 Census</th>
<th>Administrative Records</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Number</td>
<td>Percent</td>
</tr>
<tr>
<td>NRFU</td>
<td>60,432,209</td>
<td>100.0</td>
</tr>
<tr>
<td>0-2</td>
<td>2,713,417</td>
<td>100.0</td>
</tr>
<tr>
<td>3-17</td>
<td>13,959,494</td>
<td>100.0</td>
</tr>
<tr>
<td>18-24</td>
<td>7,322,346</td>
<td>100.0</td>
</tr>
<tr>
<td>25-44</td>
<td>19,498,293</td>
<td>100.0</td>
</tr>
<tr>
<td>45-64</td>
<td>12,498,785</td>
<td>100.0</td>
</tr>
<tr>
<td>65-74</td>
<td>2,447,491</td>
<td>100.0</td>
</tr>
<tr>
<td>75 and older</td>
<td>1,992,383</td>
<td>100.0</td>
</tr>
<tr>
<td>Mailout/Mailback</td>
<td>205,816,623</td>
<td>100.0</td>
</tr>
<tr>
<td>0-2</td>
<td>7,161,233</td>
<td>100.0</td>
</tr>
<tr>
<td>3-17</td>
<td>39,058,528</td>
<td>100.0</td>
</tr>
<tr>
<td>18-24</td>
<td>15,982,399</td>
<td>100.0</td>
</tr>
<tr>
<td>25-44</td>
<td>52,033,098</td>
<td>100.0</td>
</tr>
<tr>
<td>45-64</td>
<td>60,075,645</td>
<td>100.0</td>
</tr>
<tr>
<td>65-74</td>
<td>17,372,352</td>
<td>100.0</td>
</tr>
<tr>
<td>75 and older</td>
<td>14,133,368</td>
<td>100.0</td>
</tr>
<tr>
<td>Other</td>
<td>42,496,706</td>
<td>100.0</td>
</tr>
<tr>
<td>0-2</td>
<td>2,144,496</td>
<td>100.0</td>
</tr>
<tr>
<td>3-17</td>
<td>9,144,299</td>
<td>100.0</td>
</tr>
<tr>
<td>18-24</td>
<td>7,341,774</td>
<td>100.0</td>
</tr>
<tr>
<td>25-44</td>
<td>10,591,939</td>
<td>100.0</td>
</tr>
<tr>
<td>45-64</td>
<td>8,925,166</td>
<td>100.0</td>
</tr>
<tr>
<td>65-74</td>
<td>1,907,735</td>
<td>100.0</td>
</tr>
<tr>
<td>75 and older</td>
<td>2,441,297</td>
<td>100.0</td>
</tr>
</tbody>
</table>

Sources: 2010 Census and 2010 Census Match Study Administrative Records Data.

Table 31 shows whether sex data were present in administrative records by mode. Similar to other demographic characteristics, administrative record coverage was highest for sex in the Mailout/Mailback universe (96.6 percent) and lower in the NRFU universe (80.9 percent) and via other modes (71.4 percent). For each of the three response mode categories, administrative record coverage of females in the 2010 Census was slightly higher than for males.
Table 31. Coverage of 2010 Sex Data by Administrative Records
Sex Response Data by Mode

<table>
<thead>
<tr>
<th>Coverage of 2010 Sex Data by Administrative Records</th>
<th>2010 Census</th>
<th>Administrative Records</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Number</td>
<td>Percent</td>
</tr>
<tr>
<td>NRFU</td>
<td>60,432,209</td>
<td>100.0</td>
</tr>
<tr>
<td>Male</td>
<td>30,490,505</td>
<td>100.0</td>
</tr>
<tr>
<td>Female</td>
<td>29,941,704</td>
<td>100.0</td>
</tr>
<tr>
<td></td>
<td>48,866,122</td>
<td>80.9</td>
</tr>
<tr>
<td></td>
<td>24,352,259</td>
<td>79.9</td>
</tr>
<tr>
<td></td>
<td>24,513,863</td>
<td>81.9</td>
</tr>
<tr>
<td>Mailout/Mailback</td>
<td>205,816,623</td>
<td>100.0</td>
</tr>
<tr>
<td>Male</td>
<td>99,125,339</td>
<td>100.0</td>
</tr>
<tr>
<td>Female</td>
<td>106,691,284</td>
<td>100.0</td>
</tr>
<tr>
<td></td>
<td>198,838,820</td>
<td>96.6</td>
</tr>
<tr>
<td></td>
<td>95,563,261</td>
<td>96.4</td>
</tr>
<tr>
<td></td>
<td>103,275,559</td>
<td>96.8</td>
</tr>
<tr>
<td>Other</td>
<td>42,496,706</td>
<td>100.0</td>
</tr>
<tr>
<td>Male</td>
<td>22,159,255</td>
<td>100.0</td>
</tr>
<tr>
<td>Female</td>
<td>20,337,451</td>
<td>100.0</td>
</tr>
<tr>
<td></td>
<td>30,333,569</td>
<td>71.4</td>
</tr>
<tr>
<td></td>
<td>15,599,497</td>
<td>70.4</td>
</tr>
<tr>
<td></td>
<td>14,734,072</td>
<td>72.4</td>
</tr>
</tbody>
</table>

Sources: 2010 Census and 2010 Census Match Study Administrative Records Data.

Coverage by Source File

Table 32 shows administrative records coverage of Hispanic origin response data by federal and commercial data source. For all demographic characteristics, the size of the source file strongly influenced the coverage of demographic data in the 2010 Census.

The range of coverage for the 2010 Census Hispanic population in federal data was 0.04 percent to 78.1 percent and 13.0 percent to 33.9 percent for commercial data. The Numident file had the highest percent coverage of Hispanic origin response data for the Hispanic population (78.1 percent) and non-Hispanic population (92.1 percent). Previous census records had the second highest coverage at 43.1 percent for the Hispanic population and 69.1 percent for non-Hispanics. HUD TRACS had the lowest coverage for Hispanics (0.04 percent) and non-Hispanics (0.05 percent).

Commercial data sources covered 13.0 percent to 33.9 percent of Hispanics in the 2010 Census and 22.0 percent to 60.6 percent of non-Hispanics. Among the commercial sources, commercial file 2 provided the highest level of Hispanic origin response coverage at 33.9 percent for Hispanics and 60.6 percent for non-Hispanics.
Table 32: Number and Percent Coverage of 2010 Hispanic Origin Data by Administrative Records Source Files

<table>
<thead>
<tr>
<th>Administrative Records Source Files</th>
<th>Hispanic</th>
<th>Not Hispanic</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Number</td>
<td>Percent</td>
</tr>
<tr>
<td>2010 Census</td>
<td>50,477,594</td>
<td>100</td>
</tr>
<tr>
<td>Federal Files</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Previous Census Records</td>
<td>21,764,183</td>
<td>43.1</td>
</tr>
<tr>
<td>Numident</td>
<td>39,399,214</td>
<td>78.1</td>
</tr>
<tr>
<td>HUD CHUMS</td>
<td>697,169</td>
<td>1.4</td>
</tr>
<tr>
<td>HUD PIC</td>
<td>1,364,197</td>
<td>2.7</td>
</tr>
<tr>
<td>HUD TRACS</td>
<td>20,987</td>
<td>0.0</td>
</tr>
<tr>
<td>MEDB</td>
<td>3,070,925</td>
<td>6.1</td>
</tr>
<tr>
<td>TANF</td>
<td>365,626</td>
<td>0.7</td>
</tr>
<tr>
<td>Commercial Files</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Commercial File 1</td>
<td>11,349,460</td>
<td>22.5</td>
</tr>
<tr>
<td>Commercial File 2</td>
<td>17,093,059</td>
<td>33.9</td>
</tr>
<tr>
<td>Commercial File 3</td>
<td>12,732,083</td>
<td>25.2</td>
</tr>
<tr>
<td>Commercial File 4</td>
<td>6,540,972</td>
<td>13.0</td>
</tr>
</tbody>
</table>

Sources: 2010 Census and 2010 Census Match Study Administrative Records Data.

Table 33 shows administrative records coverage of race response data by federal and commercial data source (see Appendix 4 for numbers).

With few exceptions, the White alone population had higher coverage rates across the sources relative to other race groups. The coverage rate for the White alone population ranged from 0.1 percent to 71.1 percent in federal data and 18.5 percent to 55.2 percent in commercial data. Previous census records had the highest coverage rate (71.1 percent) for the White alone population, followed by the Numident at 66.0 percent. The IHS had the lowest coverage rate at 0.1 percent. Of commercial files, commercial file 4 had the lowest coverage rate for the White alone population, and commercial file 2 had the highest. Commercial file 4 had the lowest coverage rate and commercial file 2 had the highest for all race groups.

The coverage rate for the Black alone population ranged from 0.03 percent to 66.9 percent across federal sources and 16.9 percent to 45.9 percent in commercial data sources. The Numident had the highest coverage rate for the Black alone population (66.9 percent), followed by previous census records (57.0 percent). Similar to the White alone population, IHS had the lowest coverage rate at 0.03 percent.
Table 33. Percent Coverage of 2010 Race Data by Administrative Records Source Files

<table>
<thead>
<tr>
<th>Coverage of 2010 Race Data by Administrative Records</th>
<th>White Alone</th>
<th>Black Alone</th>
<th>American Indian or Alaska Native Alone</th>
<th>Asian Alone</th>
<th>Native Hawaiian or Other Pacific Islander Alone</th>
<th>Some Other Race Alone</th>
<th>Two or More Races</th>
</tr>
</thead>
<tbody>
<tr>
<td>Federal Files</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Previous Census Records</td>
<td>71.1</td>
<td>57.0</td>
<td>55.3</td>
<td>49.5</td>
<td>43.7</td>
<td>32.7</td>
<td>48.3</td>
</tr>
<tr>
<td>Numident</td>
<td>66.0</td>
<td>66.9</td>
<td>54.0</td>
<td>64.1</td>
<td>57.6</td>
<td>6.7</td>
<td>36.8</td>
</tr>
<tr>
<td>HUD CHUMS</td>
<td>1.7</td>
<td>1.4</td>
<td>1.0</td>
<td>1.0</td>
<td>1.2</td>
<td>1.1</td>
<td>1.0</td>
</tr>
<tr>
<td>HUD PIC</td>
<td>1.1</td>
<td>8.3</td>
<td>2.9</td>
<td>1.2</td>
<td>3.7</td>
<td>2.6</td>
<td>4.0</td>
</tr>
<tr>
<td>HUD TRACS</td>
<td>0.4</td>
<td>2.1</td>
<td>0.8</td>
<td>0.6</td>
<td>0.5</td>
<td>0.6</td>
<td>1.0</td>
</tr>
<tr>
<td>IHS</td>
<td>0.1</td>
<td>0.0</td>
<td>41.4</td>
<td>0.0</td>
<td>0.1</td>
<td>0.1</td>
<td>2.7</td>
</tr>
<tr>
<td>MEDB</td>
<td>16.9</td>
<td>11.6</td>
<td>9.2</td>
<td>8.5</td>
<td>6.4</td>
<td>2.4</td>
<td>5.3</td>
</tr>
<tr>
<td>TANF</td>
<td>0.5</td>
<td>2.0</td>
<td>2.3</td>
<td>0.2</td>
<td>3.2</td>
<td>0.6</td>
<td>1.7</td>
</tr>
<tr>
<td>Commercial Files</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Commercial File 1</td>
<td>38.9</td>
<td>28.9</td>
<td>15.5</td>
<td>27.0</td>
<td>12.1</td>
<td>2.1</td>
<td>14.4</td>
</tr>
<tr>
<td>Commercial File 2</td>
<td>55.2</td>
<td>45.9</td>
<td>35.8</td>
<td>41.6</td>
<td>27.0</td>
<td>27.8</td>
<td>31.1</td>
</tr>
<tr>
<td>Commercial File 3</td>
<td>43.6</td>
<td>32.6</td>
<td>22.6</td>
<td>29.9</td>
<td>16.5</td>
<td>2.6</td>
<td>18.2</td>
</tr>
<tr>
<td>Commercial File 4</td>
<td>18.5</td>
<td>16.9</td>
<td>10.6</td>
<td>13.0</td>
<td>8.2</td>
<td>1.3</td>
<td>9.2</td>
</tr>
</tbody>
</table>

Sources: 2010 Census and 2010 Census Match Study Administrative Records Data.

For the AIAN alone population, the federal coverage rate ranged from 0.8 percent to 55.3 percent, and the commercial coverage rate ranged from 10.6 percent to 35.8 percent. Similar to the White alone and Black alone populations, the Numident and previous census records had the two highest coverage rates. Previous census records had the highest coverage at 55.3 percent, and the Numident had the second highest coverage rate at 54.0 percent. IHS also covered a relatively substantial proportion of response data at 41.4 percent. HUD TRACS had the lowest coverage rate at 0.8 percent.

The federal coverage rate for the Asian alone population ranged from 0.01 percent to 64.1 percent, and the commercial coverage rate ranged from 13.0 percent to 41.6 percent. As with the previous race groups discussed, the Numident and previous census records had the greatest coverage for the Asian alone population. The Numident covered 64.1 percent of the 2010 Census Asian alone population, and previous census records covered 49.5 percent.

For the NHPI population, the federal coverage rate range was 0.1 percent to 57.6 percent, and the commercial coverage rate range was 8.2 percent to 27.0 percent. The Numident and previous census records had the highest coverage rates, 57.6 percent and 43.7 percent respectively. IHS had the lowest coverage rate at 0.1 percent.

With few exceptions, the SOR alone population had the lowest coverage rates across federal and commercial data sources. The federal coverage rate ranged from 0.1 percent to 32.7 percent, and
commercial data covered 1.3 percent to 27.8 percent. Previous census records had the highest coverage at 32.7 percent, followed by the Numident at 6.7 percent.

The federal coverage rate for the Two or More Races population ranged from 1.0 percent to 48.3 percent, and the commercial coverage rate ranged from 9.2 percent to 31.1 percent. Previous census records covered 48.3 percent of the 2010 Census Two or More Races population, followed by the Numident at 36.8 percent.

Table 34 shows administrative records coverage of age response data by federal and commercial data source (see Appendix 5 for numbers).

**Table 34. Percent Coverage of 2010 Age Data by Administrative Records Source Files**

<table>
<thead>
<tr>
<th>Coverage of 2010 Age Data by Administrative Records Age Response Data by Source</th>
<th>0-2</th>
<th>3-17</th>
<th>18-24</th>
<th>25-44</th>
<th>45-64</th>
<th>65-74</th>
<th>75 and older</th>
</tr>
</thead>
<tbody>
<tr>
<td>Federal Files</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Previous Census Records</td>
<td>1.5</td>
<td>42.1</td>
<td>69.9</td>
<td>67.7</td>
<td>79.9</td>
<td>84.0</td>
<td>85.0</td>
</tr>
<tr>
<td>Numident</td>
<td>89.5</td>
<td>90.9</td>
<td>84.9</td>
<td>86.8</td>
<td>92.8</td>
<td>94.3</td>
<td>93.5</td>
</tr>
<tr>
<td>HUD CHUMS</td>
<td>0.0</td>
<td>0.0</td>
<td>0.9</td>
<td>3.5</td>
<td>1.7</td>
<td>1.0</td>
<td>0.5</td>
</tr>
<tr>
<td>HUD PIC</td>
<td>2.9</td>
<td>4.1</td>
<td>2.3</td>
<td>1.7</td>
<td>1.4</td>
<td>1.5</td>
<td>1.6</td>
</tr>
<tr>
<td>HUD TRACS</td>
<td>1.2</td>
<td>0.9</td>
<td>0.7</td>
<td>0.4</td>
<td>0.5</td>
<td>1.3</td>
<td>2.2</td>
</tr>
<tr>
<td>IHS</td>
<td>0.6</td>
<td>0.9</td>
<td>0.9</td>
<td>0.8</td>
<td>0.7</td>
<td>0.6</td>
<td>0.4</td>
</tr>
<tr>
<td>MEDB</td>
<td>0.0</td>
<td>0.0</td>
<td>0.5</td>
<td>2.2</td>
<td>8.9</td>
<td>90.5</td>
<td>91.4</td>
</tr>
<tr>
<td>SSR</td>
<td>0.8</td>
<td>1.7</td>
<td>1.9</td>
<td>1.7</td>
<td>2.8</td>
<td>3.9</td>
<td>4.4</td>
</tr>
<tr>
<td>SSS</td>
<td>0.0</td>
<td>0.1</td>
<td>37.4</td>
<td>2.1</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
</tr>
<tr>
<td>TANF</td>
<td>2.9</td>
<td>1.7</td>
<td>0.9</td>
<td>0.6</td>
<td>0.2</td>
<td>0.1</td>
<td>0.0</td>
</tr>
<tr>
<td>Commercial Files</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
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<td>0.1</td>
<td>0.1</td>
<td>9.7</td>
<td>31.7</td>
<td>49.8</td>
<td>55.7</td>
<td>53.4</td>
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<tr>
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<td>0.2</td>
<td>0.9</td>
<td>25.9</td>
<td>39.2</td>
<td>65.1</td>
<td>70.7</td>
<td>66.9</td>
</tr>
<tr>
<td>Commercial File 3</td>
<td>0.1</td>
<td>0.5</td>
<td>25.9</td>
<td>42.2</td>
<td>62.2</td>
<td>67.9</td>
<td>65.3</td>
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<tr>
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<td>25.1</td>
<td>26.5</td>
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<td>0.1</td>
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<td>74.1</td>
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<td>0.4</td>
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<td>Commercial File 8</td>
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<td>1.2</td>
<td>40.0</td>
<td>66.4</td>
<td>67.8</td>
<td>62.2</td>
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</table>

Sources: 2010 Census and 2010 Census Match Study Administrative Records Data.

The Numident age response data covered a substantial proportion of 0 to 2 year olds in the 2010 Census at 89.5 percent. All other federal and commercial data sources covered less than 3 percent each. The Numident age response data also covered a substantial proportion of those 3 to 17 years old in the 2010 Census at 90.9 percent. Previous census records covered 42.1 percent. All other data covered less than 4.2 percent.

The Numident covered 84.9 percent of the 18 to 24 age group, followed by previous census records at 69.9 percent. Commercial file 2 and commercial file 3 had the highest coverage rates.
for the 18 to 24 age group among commercial files at 25.9 percent each. The Numident covered 86.8 percent of the 25 to 44 age group, and previous census records covered 67.7 percent. Commercial file 5 and commercial file 3 had the highest coverage for this age group at 45.4 percent and 42.2 percent respectively. The Numident covered the highest percentage of age responses for the age groups 45 to 64, 65 to 74, and 75 and older. Commercial file 5 had the highest coverage for all three of these age groups among the commercial data.

Table 35 shows administrative records coverage of sex response data by federal and commercial data source.

**Table 35. Number and Percent Coverage of 2010 Sex Data by Administrative Records Source Files**

<table>
<thead>
<tr>
<th>Coverage of 2010 Sex Data by Administrative Records Sex Response Data by Source</th>
<th>Male</th>
<th>Female</th>
</tr>
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<tr>
<td></td>
<td>Number</td>
<td>Percent</td>
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<td>Federal Files</td>
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<td>Previous Census Records</td>
<td>98,056,250</td>
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<tr>
<td>Numident</td>
<td>135,270,982</td>
<td>89.1</td>
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<td>HUD CHUMS</td>
<td>2,607,763</td>
<td>1.7</td>
</tr>
<tr>
<td>HUD PIC</td>
<td>2,535,359</td>
<td>1.7</td>
</tr>
<tr>
<td>HUD TRACS</td>
<td>817,071</td>
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</tr>
<tr>
<td>IHS</td>
<td>1,096,844</td>
<td>0.7</td>
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<tr>
<td>MEDB</td>
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<tr>
<td>SSS</td>
<td>13,211,190</td>
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</tr>
<tr>
<td>TANF</td>
<td>874,359</td>
<td>0.6</td>
</tr>
<tr>
<td>Commercial Files</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Commercial File 1</td>
<td>60,929,919</td>
<td>40.1</td>
</tr>
<tr>
<td>Commercial File 2</td>
<td>77,959,856</td>
<td>51.4</td>
</tr>
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<td>Commercial File 3</td>
<td>64,421,794</td>
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<td>Commercial File 4</td>
<td>27,970,377</td>
<td>18.4</td>
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<td>Commercial File 5</td>
<td>74,729,309</td>
<td>49.2</td>
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<td>Commercial File 6</td>
<td>370,287</td>
<td>0.2</td>
</tr>
<tr>
<td>Commercial File 7</td>
<td>49,329,354</td>
<td>32.5</td>
</tr>
</tbody>
</table>

Sources: 2010 Census and 2010 Census Match Study Administrative Records Data.

The federal coverage rate for males ranged from 0.5 percent to 89.1 percent, and the commercial coverage rate ranged from 0.2 percent to 51.4 percent. For females, the federal data covered 0.04 percent to 90.7 percent, and commercial data covered 0.3 percent to 55.6 percent. Numident had the highest coverage for both males (89.1 percent) and females (90.7 percent). Previous census records had the second highest coverage at 64.6 percent for males and 67.7 percent for females. Commercial file 6 had the lowest coverage rate for males and females, and commercial file 2 had the highest coverage.
Overall, the Numident and previous census records had the highest coverage of demographic response data across all demographic groups. For many demographic groups such as age and sex, and for the White alone, Black alone, and Asian alone populations, these datasets also tended to have relatively high quality response data.

6. Related Census Program for Evaluations and Experiments Reports

The following Census Program for Evaluations and Experiments reports are related to the Census Match Study.

- 2010 Census Evaluation of Small Multi-Unit Structures Report
- 2010 Census Nonresponse Followup Operations Assessment
- 2010 Census Operational Assessment for Type of Enumeration Area Delineation

7. Lessons Learned, Conclusions, and Research Implications

Administrative records data are available for use in census operations. Data with a reference date appropriate for Census Day can be identified. Once acquired, federal and commercial data can be processed, unduplicated, and ready to use for Census purposes within two to four weeks. The 2010 Census Match Study used twenty files from eight federal agencies and five commercial data vendors.

Administrative records data are reliable for address and count confirmation for persons and addresses. Administrative records data confirmed person data in the 2010 Census for 273.6 million persons or 98.0 percent of census respondents with a PIK. Administrative records failed to match 2010 Census records lacking name data. 2010 Census address data were confirmed for 122.0 million addresses or 92.6 percent.

Administrative records data can improve census data quality for respondent characteristics and treatments of missing data. Census data quality can be improved by integrating administrative records information into item imputation methods. For instance, administrative data, including the Numident and previous census records had high quality age and sex data. They also contain age and sex response data for about 278 million persons in the 2010 Census.

Administrative data use can reduce the cost of future data collections by enhancing the MAF and through strategies addressing non-response. Administrative records can help direct field operations to areas with low person and address confirmation and areas of new construction with an operation such as targeted address canvassing. Administrative records data can be used to confirm housing unit status and to identify or confirm occupied status. Of the 116.7 million occupied housing units in the 2010 Census, administrative records showed agreement for 96.1 million. Administrative records show potential for use in household size imputations. About 55.5 million housing units in the 2010 Census had the same population count in administrative
records. When administrative records and the 2010 Census differed in population count for housing units, the population count differed by one person for 63.7 percent of those housing units.

The 2010 Census Match Study was designed to compile an unduplicated list of administrative records addresses and persons. The lists were counted and compared to 2010 Census results. Validated records in the lists were matched by unique housing unit and person identifiers. This matching was done to assess the quality and coverage of information in the administrative records files, but in essence simulated an administrative records census. The results indicate that the United States does not have an administrative records infrastructure suitable for an administrative records census. The 2010 Census Match Study sought to find the same person in the same housing unit, but the complexities of the administrative records data made the comparisons difficult and at times suspect. The complexities ranged from missing and false name, address, and date of birth information to data universe and timing discrepancies. Efforts to mitigate these challenges, such as only including validated (PIKed) persons in the comparisons introduced new problems, since the PIKed persons are likely different from the unPIKed persons in terms of characteristics and response propensities. Yet overall, the results indicate sufficient promise in administrative records to pursue operational designs for future frames and censuses.

The 2010 Census Match Study should be viewed as a national-level proof of concept for household administrative records, demonstrating the Census Bureau’s ability to acquire and process public and private administrative records. The results indicate that the additions to the federal files used in StARS were worthwhile. Commercial data were a useful addition for address coverage, but more work is needed to understand how the data can enhance person coverage or person follow up operations. The unduplicated administrative records files provide high coverage, high quality information to inform occupied status imputations, and more work is needed to explore how administrative records data can be used in household size imputations without creating overcounts and undercounts of key populations. The demographic data quality analyses revealed that administrative records files contain high coverage, high quality information on age and sex, and that federal files can enhance previously collected census data for race and Hispanic origin information.

Future operational uses of administrative data need to focus on which files are fit for their particular needs; this study’s results indicate that neither one file nor one composite will be adequate for both item and count imputations.

**Research Implications**

1. **Administrative records can enhance, but not replace the decennial census.** While the quality and coverage of administrative records relative to the 2010 Census suggests that
administrative records can be utilized in decennial census operations, the quality is not high enough and the coverage is not expansive enough to replace a traditional census.

2. **Use of administrative records in Nonresponse Followup can reduce costs.** Administrative records cover a substantial number of Nonresponse Followup addresses and persons, and nearly half of person-address pairs. Of the 23.6 million addresses that responded in Nonresponse Followup in the 2010 Census, administrative records matched to 21.0 million or 89.2 percent. Administrative records also matched to a substantial number of persons that were in Nonresponse Followup in the 2010 Census. Of the 60.4 million persons in Nonresponse Followup in the 2010 Census, 48.0 million or 79.5 percent were in administrative records. Administrative records matched to a lower number and proportion of person-address pairs in Nonresponse Followup compared to addresses and persons. Of the 60.4 million 2010 person-address pairs in Nonresponse Followup, there were 28.7 million or 47.5 percent that matched to administrative records. Research and improvements in record linkage, refinements of the best address model, and acquiring data that cover those most likely to be in Nonresponse Followup may enhance the person-address match between the 2010 Census and administrative records.

3. **Administrative records can assist in determining housing unit and occupancy status.** Administrative records can assist to verify whether a housing unit is a valid livable housing unit and whether it is occupied. Occupancy status results demonstrate the value of administrative records for these purposes. Of the 116.7 million occupied housing units in the 2010 Census, administrative records indicated that 96.1 million or 82.3 percent were occupied. The 2010 Census designated 15.0 million housing units as vacant, of which administrative records found that 11.4 million or 76.1 percent were not occupied. Of the 4.9 million housing units designated as deletes in the 2010 Census, administrative records indicated that 4.2 million or 85.4 percent were not occupied.

4. **Administrative records can inform household population count assignment.** Administrative records had the same population count for the majority of 2010 Census housing units that matched to administrative records. Of the 116.7 million 2010 Census occupied housing units, 96.1 million matched to administrative records. Of these, 55.5 million or 57.7 percent of housing units had the same population count. When administrative records and the 2010 Census did not have the same population count, the count differed by one person for 63.7 percent of the housing units. Further research should be conducted on this universe.

5. **Acquiring additional federal, state, and commercial data can improve address, person, and demographic characteristic coverage.** Administrative data do not cover children as well as they cover adults. Also, the quality of race and Hispanic origin response data from federal and commercial sources varies considerably by race and Hispanic origin group. The Census Bureau should partner with federal agencies, state
agencies, community groups, and other organizations to obtain data that contain
information on children living in households, and additional race and Hispanic origin
response data should be acquired, particularly for groups where the quality of race or
Hispanic origin response data is low in administrative records. Obtaining data for the
following groups should be a priority: Two or More Races, Native Hawaiian or Other
Pacific Islander, and American Indian or Alaska Native.

6. **Administrative records can inform race and Hispanic origin determination.** For
some race and Hispanic origin groups, the quality of administrative records response data
was high. For instance, the White alone, Black alone, and Asian alone populations had
relatively high quality race response data in administrative records compared to other
race groups. The quality of administrative records files ranged from 94.7 percent to 99.1
percent for the White alone population. The quality of federal data for the Black alone
population ranged from 87.4 percent to 98.3 percent. The range was considerably lower
for commercial data. For the Asian alone population, the quality of both federal and
commercial data ranged from 58.0 percent to 94.1 percent. Data could also be used for
other race groups from administrative records, but the quality was generally lower.
Research should be conducted on how administrative records can assist with race and
Hispanic origin determination for censuses and surveys.

7. **Administrative records can assist age and sex determination.** The quality of age and
sex response data in administrative records is high. For sex, the quality of administrative
data ranged from 94.7 percent to 100.0 percent across administrative records files. For
age, in data sources that contained date of birth, the quality of administrative records
ranged from 79.0 percent to 98.5 percent. Research should be conducted on how
administrative data can assist with age and sex determination for censuses and surveys.

8. **Conduct additional record linkage research with the aim of improving match results
for unvalidated person records.** Many improvements were made to the Person
Identification Validation System to enhance the assignment of protected identification
keys and master address file identification numbers to administrative records data.
Continued record linkage research on the Person Identification Validation System should
be conducted to further enhance the assignment of protected identification keys and
master address file identification numbers to persons and addresses, potentially
increasing the universe of persons and addresses that can be matched and unduplicated
between censuses and surveys and administrative records. For instance, of the 308.7
million persons in the 2010 Census, 29.6 million did not receive a protected identification
key. Of these, 10.3 million could not be sent through Person Identification Validation
System processing because they lacked name and date of birth, and 19.3 million went
through Person Identification Validation System processing but failed to receive a
protected identification key. Additional research should be conducted on how to
minimize this latter universe.
9. **Conduct record linkage research to improve match results for records with incomplete name and date of birth data.** Commercial data sources often lack complete name and date of birth information. Research to unduplicate these records that failed the Person Identification Validation System, and assess the quality of the data is needed. Research on how to use records that lack personally identifiable information is needed, moving the matching approach beyond validation using the Social Security Administration Numerical Identification File.

10. **Conduct record linkage research that improves person record unduplication.** Current record linkage techniques must determine whether two people that look similar are indeed the same person or if they are two different people. Refinements on record linkage techniques will help to more accurately unduplicate person records.

11. **Develop partnerships with federal and state agencies to better understand administrative records and enhance record linkage research.** Partnering with federal and state agencies will facilitate knowledge sharing on the availability of data that could enhance record linkage processes. This knowledge sharing will also benefit administrative records research. For instance, a better understanding of how data were collected could assist in the validation and unduplication process and improve understanding of resulting linkages.

12. **Assess whether an administrative records composite improves missing data assignment.** Building an administrative records composite involves unduplicating records, assigning persons at multiple addresses to one address, and assigning one characteristic to people that have different characteristics across source files. Research should assess the quality of missing data assignment using a composite compared to using all available administrative data.

13. **Analyze linked survey data, especially the American Community Survey, to explore characteristics associated with data coverage and consistency.** Evaluating administrative records relative to the 2010 Census provided important information, at different levels of geography and by certain characteristics, about the quality and coverage of administrative data. Other evaluations using survey data such as the American Community Survey can provide additional insights because the American Community Survey has many additional characteristics that can be analyzed.
8. Acknowledgements

The authors of this report would like to thank Deborah Wagner, Damon Smith, Matthew Bouch, Mary Layne, Juan Carlos Humud, and Michael Moldoff for PVSing the files used in the 2010 Census Match Study.

We would also like to thank Brian Clark for assisting with quality controls for the report.
9. References


Appendix 1. 2010 Census and Administrative Records Address Count and Match Numbers and Ratios by State

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<td>92.6</td>
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Sources: 2010 Census and 2010 Census Match Study Administrative Records Data.
Appendix 2. Number of Administrative Records Race Response Data that Matched to the 2010 Census

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<th>Source File</th>
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<th>American Indian or Alaska Native Alone</th>
<th>Asian Alone</th>
<th>Native Hawaiian or Other Pacific Islander Alone</th>
<th>Some Other Race Alone</th>
<th>Two or More Races</th>
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Note: N/A indicates that data were not available for a demographic group.

Sources: 2010 Census and 2010 Census Match Study Administrative Records Data.
Appendix 3. Number of Administrative Records Age Response Data that Matched to the 2010 Census

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<th>2010 Census and Administrative Records Age Response Match by Source File</th>
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<td>25-44</td>
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<td>14,984,587</td>
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Note: N/A indicates that data were not available for a demographic group.
Sources: 2010 Census and 2010 Census Match Study Administrative Records Data.
# Appendix 4. Number Coverage of 2010 Census Race Data by Administrative Records Source Files

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<th>Coverage of 2010 Race Data by Administrative Records Race Response Data by Source File</th>
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<th>Asian Alone</th>
<th>Native Hawaiian or Other Pacific Islander Alone</th>
<th>Some Other Race Alone</th>
<th>Two or More Races</th>
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Sources: 2010 Census and 2010 Census Match Study Administrative Records Data.
### Appendix 5. Number Coverage of 2010 Census Age Data by Administrative Records

#### Source Files

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<th>25-44</th>
<th>45-64</th>
<th>65-74</th>
<th>75 and older</th>
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Sources: 2010 Census and 2010 Census Match Study Administrative Records Data.
2020 Census
Life-cycle Cost Estimate
Executive Summary
Version 1.0

For Official Use Only

This estimate has been prepared in support of the Version 3.0 release of the 2020 Operational Plan. Estimates contained herein are as of October 10, 2017

December 21, 2017
Approval of Estimate

Approved and Submitted by:

___________________________________________  ______________________
Associate Director for Decennial Programs     Date

Endorsed by:

___________________________________________  ______________________
Chief Financial Officer                      Date
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1. **Introduction**

The goal of the 2020 Census is to count everyone once, only once, and in the right place. As the cost of completing this goal has significantly increased each decade since 1970 as the population becomes more challenging to count, the Census Bureau undertook a challenge this decade to design the 2020 Census to cost less per housing unit than the 2010 Census (when adjusted for inflation), while continuing to maintain high quality results. The cost of repeating the 2010 Census methodology in 2020 is $120 per housing unit and the 2020 Census, as currently designed, is expected to cost $107 per housing unit (including contingency)\(^1\). The Census Bureau plans to achieve this through the most automated, modern, and dynamic decennial census in history.

The 2020 Census embraces technology to ensure a fair and accurate count that will lay the framework for censuses for decades to come. The 2020 Census Operational Plan Version 3.0 released in October 2017 details plans for the first decennial census to update the Census Bureau’s address frame using geographic information systems and aerial imagery instead of sending census employees to walk and physically check all 11 million census blocks; the first to encourage the population to respond to the 2020 Census using the Internet and over the telephone, reducing the need for expensive paper data capture; the first to use data the public has already provided to the government and data available from commercial sources to enable focusing of additional visits in areas that have traditionally been hard to enumerate; and the first to use sophisticated operational control systems to send Census Bureau employees to follow up with nonresponding housing units and to track daily progress.

1.1 **Executive Summary Purpose**

This executive summary of the 2020 Census Lifecycle Cost Estimate (LCCE) is intended to provide the public with a high-level overview of the November 2017 version of 2020 Census LCCE and the supporting 2020 Census LCCE Basis of Estimate (BoE) and related documentation artifacts. The executive summary does not contain a detailed breakout of the costs, assumptions, etc. Detailed documentation of the 2020 Census LCCE is contained in the BoE and its accompanying suite of artifacts. This suite is the detailed formal documentation of the cost estimate that is not published for the general public but rather is intended for official government use including for auditors and oversight bodies.

---

\(^1\) Note that all costs are presented in then-year (also called current-year) dollars. Then-year dollars are those that have been inflated using an established inflation rate that are expressed in the year when the disbursements or expenditures are expected to occur. The 2020 Census uses the Chained Price Index (CPI) from the Office of Management and Budget’s (OMB’s) Table 10.1 entitled Gross Domestic Product and Deflators Used in the Historic Tables: 1940-2022.
2. Background

2.1 The 2020 Census

The purpose of the 2020 Census is to conduct a census of population and housing and disseminate the results to the President, the States, and the American people in keeping with Article I and the Fourteenth Amendment of the U.S. Constitution. To accomplish this, the Census Bureau must count everyone once, only once, and in the right place. As the 2020 Census draws near, the Census Bureau has designed a 2020 Census that ensures the coverage of the population and housing is as complete as possible. The design will serve to minimize the undercounting or overcounting the population, particularly as related to the differential impact on subgroups of the population.\(^2\) The Census Bureau is fully committed to designing and conducting a 2020 Census that accurately counts every person residing in America.

The primary requirement served by the decennial census is the apportionment of seats allocated to the states for the House of Representatives. This requirement is mandated in the U.S. Constitution:

\[
\text{Article I, Section 2, “The actual enumeration shall be made within three years after the first meeting of the Congress of the United States, and within every subsequent Term of ten Years”}
\]

\[
\text{Fourteenth Amendment, Section 2, “Representatives shall be apportioned among the several States according to their respective numbers, counting the whole number of persons in each State”}
\]

2.2 Uses of Decennial Census Data

As discussed above, decennial data are used to apportion the number of seats in Congress among the states. Decennial data at the census block level are also used by governmental entities for redistricting, i.e., defining the representative boundaries for congressional districts, state legislative districts, school districts, and voting precincts. Additionally, decennial data are used to enforce voting rights and civil rights legislation.

The Census Bureau also uses the decennial census results to determine the statistical sampling frames for the American Community Survey (ACS), which replaced the long form in the decennial census, and the dozens of current household surveys conducted by the Census Bureau. The results of these surveys are used to support important functions, such as appropriating

\(^2\) A detailed discussion of the quality implications of the 2020 Census design can be found in Chapter 7 of the 2020 Census Operational Plan Version 3.0.
federal funds to local communities (an estimated $675 billion annually\(^3\)); calculating monthly unemployment, crime, and poverty rates; and publishing health and education data.

Finally, Census Bureau data, including decennial data, play an increasingly important role in the United States economy. As people expand their use of data to make decisions at the local and national levels, they increasingly depend on data from the Census Bureau. Today, local businesses look at data provided by the Census Bureau on topics like population growth and income levels to make decisions about whether or where to locate their restaurants or stores. Similarly, a real estate investor, who is considering investing significant funds to develop a piece of land in the community relies on Census Bureau data to measure the demand for housing, predict future need, and review aggregate trends. Big businesses also rely heavily on Census Bureau data to make critical decisions that impact their success and shape the economy at the national level. As noted above, the decennial census is the foundation for the Census Bureau’s demographic survey data.

## 2.3 Challenging Environmental Factors

Multiple environmental factors have the potential to impact the Census Bureau’s ability to conduct a fair and accurate count. The Census Bureau is committed to proactively addressing the challenges outlined below in Figure 1 and further elucidated in greater detail in the section below.

Constrained fiscal environment: Discretionary caps and sequestration through 2021 have placed pressure on funding available for the research, testing, design and implementation work for the 2020 Census that is especially important during 2016 through 2018 to ensure successful innovation in the 2020 Census. Each fiscal year during the 2020 Census lifecycle, appropriated funding has been less than requested or not provided at the start of each fiscal year. The Census Bureau has had to reprioritize its projects, either by cancelling certain activities like field testing or postponing activities to later in the decade, increasing operational risk to the program.  

Rapidly changing use of technology: Stakeholders expect the decennial census to leverage technological innovation, yet the rapid pace of change makes it challenging to plan for and adequately test the use of these technologies before they become obsolete.

Information explosion: Rapid changes in information technology create stakeholder expectations for how the Census Bureau interacts with the public to obtain and disseminate data products. This creates the possibility of gaps between stakeholder expectations and the capabilities of the Census Bureau.

Figure 1: 2020 Census Environment

---

4 A detailed discussion of the major program risks can be found in Chapter 6 of the 2020 Census Operational Plan.
desires that the Census Bureau uses the latest technology and the program’s ability to meet those expectations.

- **Declining response rates:** Response rates for Census Bureau surveys and for outside surveys have declined over the past few decades as people are overloaded with requests for information and become increasingly concerned about sharing information. The 2020 Census has a direct impact on cost because lower self-response rates require greater uses of expensive field operations to contact nonresponding households.

- **Distrust in government:** Concerns continue to grow about information security and privacy, the confidentiality of information given to the government, and how government programs will use the information collected. This makes it more difficult to collect important demographic survey information. This problem is magnified by the general concern around data security that is intensified whenever a high-profile data breach occurs. If a substantial segment of the public is not convinced that the Census Bureau can safeguard their response data against data breaches and unauthorized use, then response rates may be lower than projected, leading to an increase in cases for follow-up and costs.

- **Increasingly diverse population:** The demographic and cultural make-up of the United States continues to increase in complexity, including a growing number of households and individuals of limited English proficiency, who may experience language barriers to enumeration and varying levels of comfort with government involvement. The program is working to form partnerships with these communities to communicate the benefits of responding and engender their trust. In the absence of such partnerships, the program risks that these communities will not be fully covered by the 2020 Census.

- **Informal, complex living arrangements:** Households are becoming more diverse and dynamic, making it a challenge to associate an identified person with a single location. For example, blended families may include children who have two primary residences. Additionally, some households include multiple relationships and generations. This makes it more difficult for the Census Bureau to reach respondents, as well as creates a risk that people will either be missed by the census, or counted twice.

- **A mobile population:** The United States continues to be a highly mobile nation. Based on results from the 2015 American Community Survey, approximately 15 percent of the population moves in a given year. The continued growth in cellular telephone technology and the reduction in landline telephones tied to physical locations also make it more difficult for the Census Bureau to reach respondents, as
well as creates a risk that individuals will either be missed by the census, or counted twice.

2.4 A New Design for the 21st Century

The societal, demographic, and technological trends listed above can result in a population that is harder and more expensive to enumerate. The Census Bureau has, decade after decade, spent more money to maintain the same level of accuracy as previous censuses, as it has become more challenging to locate individuals and solicit their participation through traditional methods. The innovations described in the 2020 Census Operational Plan Version 3.0, estimates that cost avoidance can be realized relative to replicating a design similar to that of the 2010 Census.

Estimates for expected total costs for the 2020 Census are approximately $17.5B in 2020 if the Census Bureau repeats the 2010 Census design and methods. With the innovations described below, as of October 2017 the Census Bureau estimates that it can conduct the 2020 Census for approximately $15.6B.

Field costs associated with Address Canvassing and Nonresponse Followup operations comprise the most expensive aspects of the 2020 Census. Four innovation areas are aimed at reducing the costs of fieldwork to support a complete and accurate count. A reengineered Address Canvassing operation is expected to reduce the field workload for address updating by 70 percent. Self-response innovations, which are aimed at generating the largest possible self-response rate, coupled with the use of administrative records and third-party data, are intended to reduce the field workload associated with Nonresponse Followup. Finally, the reengineered field operations are intended to increase the efficiency of those operations, allowing managers and fieldworkers to be more productive and effective.

Figure 2 describes at a high-level how the 2020 Census will be conducted. This design reflects a flexible approach that takes advantage of new technologies and data sources while minimizing risk.

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5 Note that all costs are presented in then-year (also called current-year) dollars. Then-year dollars are those that have been inflated using an established inflation rate that are expressed in the year when the disbursements or expenditures are expected to occur. The 2020 Census uses the Chained Price Index (CPI) from the Office of Management and Budget’s (OMB’s) Table 10.1 entitled Gross Domestic Product and Deflators Used in the Historic Tables: 1940-2022.
The first step in conducting the 2020 Census is to identify all of the addresses where people could live, or Establish Where to Count. An accurate address list helps ensure that everyone is counted. For the 2020 Census, the Census Bureau began an in-office review of 100 percent of the nation’s addresses in September 2015 and is continually updating the address list based on data from multiple sources, including the U.S. Postal Service, tribal, state, and local governments, satellite imagery, and third-party data providers. The Census Bureau has already completed the first pass of the entire nation with this in-office Address Canvassing operation. This office work will also determine which parts of the country require fieldwork to verify address information. In-Field Address Canvassing will begin in 2019 and is anticipated to cover approximately 30 percent of all addresses where in-office address canvassing methods do not work well like where tree cover interferes with the use of imagery or in cities where high-rise construction makes address change difficult to detect using aerial imagery.

As discussed earlier, response rates to surveys and censuses have been declining. To Motivate People to Respond, the 2020 Census will include a nation-wide communications and partnership campaign. This campaign is focused on getting people to respond on their own (self-respond). It costs significantly less to process a response provided via the Internet or through a paper form than it does to send a fieldworker to someone’s home to collect their response. Advertising will make heavy use of digital media, tailoring the message to the audience. The partnership program will use trusted voices in the community to explain the importance of the 2020 Census and encourage wide participation.
The Census Bureau **Counts the Population** by collecting information from all households, including those residing in group or unique living arrangements. The Census Bureau wants to make it easy for people to respond anytime and anywhere. To this end, the 2020 Census will offer the opportunity and encourage people to respond via the Internet and will encourage, but not require, people to enter a unique Census Identification with their response. Online responses will be accurate, secure, and convenient.

The goal for the 2020 Census is to reduce the average number of visits to nonresponding households relative to prior decennial censuses by using available data from government administrative records and third-party sources. The Census Bureau plans to use these data to identify vacant households, to determine the best time of day to visit a particular household, and to count the people and fill in the responses with existing high-quality data from trusted sources. These uses of government administrative records and third-party sources have shown promise during our testing throughout the decade and will be tested again in the 2018 End to End Census Test. Deploying our resources in the field in the most cost-effective ways allows the Census Bureau to focus time and manpower to maximize response rates across geographic areas and demographic groups.

In addition, the majority of fieldworkers will use mobile devices for collecting the data. Operations such as recruiting, training, and payroll will be automated, reducing the time required for these activities. New operational control centers will rely on automation to manage most of the fieldwork, enabling more efficient case assignment, automatic determination of optimal travel routes, and reduction of the number of physical offices. In general, a streamlined operation and management structure is expected to increase productivity and save costs, such that Census Bureau staff may focus on their core mission of conducting a complete and accurate count.

The last step in the 2020 Census is to **Release the 2020 Census Results**. The 2020 Census data will be processed and sent to the President for apportionment by December 31, 2020, to the states for redistricting by April 1, 2021, and to the public beginning in December 2021.

### 2.5 The Role of the LCCE

The LCCE is the estimated cost of developing, producing, deploying, maintaining, operating and disposing of a system or program over its entire lifespan. The LCCE is prepared to support and inform budget requirements, source selections, resource allocation trade-off analyses, program change decisions, and major program reviews. The LCCE provides the basis for the official projected cost for a system or program that is communicated to the Department of Commerce (DOC), the Office of Management and Budget (OMB), Congress, the Government Accountability Office (GAO) and the public.

As the basis for the official projected cost of the program, the LCCE provides Census Bureau and Department of Commerce leadership with critical information for making program decisions, establishing executable budgets, and proactively addressing financial issues.
Section 3 of this document provides an overview of the approach, methodology, major assumptions, cost drivers and cost profile of the 2020 Census LCCE.

2.6 Improving the LCCE

As discussed in Chapter 2 of the GAO Cost Estimation and Assessment Guide, entitled Why Government Programs Need Cost Estimates and the Challenges in Developing Them\(^6\), developing a quality cost estimate is a significant challenge.

Developing a good cost estimate requires stable program requirements, access to detailed documentation and historical data, well-trained and experienced cost analysts, a risk and uncertainty analysis, the identification of a range of confidence levels, and adequate contingency and management reserves. Even with the best of these circumstances, cost estimating is difficult. It requires both science and judgment. And, since answers are seldom if ever precise, the goal is to find a ‘reasonable’ answer.

In June 2016, the GAO released a report\(^7\) on its May 2016 assessment of the 2020 Census LCCE and judged the estimate as “not reliable.” GAO provided a set of recommendations for the Census Bureau to implement that would facilitate the improvement of the 2020 Census LCCE. Specifically, the GAO recommended that the 2020 Census LCCE ensure that:

1. The estimate includes all life-cycle costs and documents all cost-influencing assumptions.
2. The planned documentation plan captures the source data used; contains the calculations performed and the estimating methodologies used for each element; and describes step by step how the estimate was developed.
3. The estimating technique for each cost element is used appropriately and that variances between planned and actual cost are documented, explained, and reviewed.
4. The estimate includes a sensitivity analysis, major cost elements are cross-checked to see whether results are similar, and an independent cost estimate is conducted to determine whether other estimating methods produce similar results.

As a result, the Census Bureau developed a Cost Estimation Enhancement Plan to mature the 2020 Census LCCE and its associated processes via a series of three-month sprints. The action plan covers four enhancement areas. These areas are: 1) Documentation Enhancement, 2) Process Enhancement, 3) Cost Estimate Enhancement, and 4) Cost Integration Enhancement. The specific artifacts associated with the enhancement efforts are shown below.

- 2020 Census LCCE BoE – a document that describes, step by step, the scope of the estimate, the cost estimating process, and the data sources, assumptions, and methods used so that a cost analyst unfamiliar with the program could understand what was done

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and replicate it. This artifact directly addresses most of the GAO recommendations on the need for improved documentation.

- **2020 Decennial Census Program Cost Estimation and Assessment Process (CEAP)** – a document that establishes a cost estimation and analysis process that will provide a common framework for planning, developing, and managing cost estimates in alignment with GAO and other best practices. This process directly addresses the GAO recommendations for improved cost estimation practices.

- **Cost Center of Excellence (CCOE) Charter** – charter that lays out roles and responsibilities for a body of 2020 Census Programs cost estimation subject matter experts and stakeholders. This body will support the improvement of cost estimation practices and usage across the program. This charter directly addresses the GAO recommendations for improved internal practices and internal controls.

- **Decennial Directorate Cost Guidance** – guidance document to support the implementation and governance associated with the CEAP and the CCOE. This guidance directly addresses the GAO recommendations for improved internal practices and internal controls.

- **2020 Census Work Breakdown Structure (WBS) Dictionary** – document that defines the WBS elements and a platform to guide more effective understanding of how to categorize costs in a consistent manner. This artifact directly addresses the GAO recommendations for improved documentation and the need to ensure that the estimate covers the entire scope of the program.

- **2020 LCCE Version Control Plan** – document that establishes a disciplined approach to cost estimate updates, changes and releases. This artifact directly addresses the GAO recommendation to improve documentation and internal controls.

In addition to reflecting GAO best practices, the revised 2020 Census Life Cycle Cost Estimate provided in this document reflects an extensive 2020 Census program management and cost assessment review conducted by Secretary Wilbur L. Ross and Under Secretary for Economic Affairs Karen Dunn Kelley during 2017. Additional details concerning this assessment can be found in the October 31, 2017 Senate Homeland Security and Governmental Affairs Committee testimony of Secretary Ross.

### 3. Overview of the 2020 Census LCCE

The 2020 Census LCCE has been developed by a team within the Decennial Budget Office (DBO). This small team is comprised of certified cost estimators and experienced subject matter experts from the Census Bureau and supporting contractor resources. The team has consulted with independent cost estimators from the Department of Commerce in detail in developing the estimate.

Note that all costs are presented in then-year (also called current-year) dollars. Then-year dollars are those that have been inflated using an established inflation rate that are expressed in the year when the disbursements or expenditures are expected to occur. The 2020 Census uses the

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8 This testimony can be reviewed at the following URL: [http://www.hsgac.senate.gov/download/testimony-ross-2017-10-31](http://www.hsgac.senate.gov/download/testimony-ross-2017-10-31)
2020 Census Life-cycle Cost Estimate

Chained Price Index (CPI) from the Office of Management and Budget’s (OMB’s) Table 10.1 entitled Gross Domestic Product and Deflators Used in the Historic Tables: 1940-2022.

The 2020 Census is a large and complex operation, and therefore the cost estimate that supports it is also large and complex. To accommodate the operation, the 2020 Census LCCE is built using a multi-dimensional database and data manipulation and reporting tools. The tool the 2020 Census LCCE is built upon is called the Decennial Budget Integration Tool (DBiT). DBiT is used by the Decennial Programs to develop cost estimates and to perform budgeting, planning, and execution management functions for the 2020 Census using the IBM Cognos TM1 platform. IBM Cognos TM1 is an enterprise planning software platform that can accommodate the entire planning cycle by taking advantage of advanced OLAP and reporting capabilities. The current DBiT platform provides two major capabilities: i) Enterprise Planning, which is used by the DBO for cost modeling and estimation, budget planning, formulation and execution; and ii) Business Intelligence, which enables highly-capable analysis and interactive reporting. Within the 2020 Census LCCE there are 1,151 data cubes and over 1,859 inputs and assumptions. There are over 77,000 summary cost records.

The use of the IBM TM1 Cognos platform’s data warehousing capabilities provides the 2020 Census LCCE with the ability to use multi-dimensional cubes to bring data sets to bear for calculations, analyses and reference. This has allowed for the Census Bureau to develop a cost estimate with a high degree of rigor and complexity while maintaining the ability to fully document and analyze the data and results. In the example cube shown in Figure 3 below, the dimensions of Time, Product and Measures are drawn into a cube that can then be used for variety of analyses.

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- **Dimensional Model**: a database design technique for optimizing data querying
- **Online Analytical Processing (OLAP)**: category of software tools that perform calculations upon multi-dimensional data sets
- **Cube**: multi-dimensional array of data
- **Star schema**: a type of data warehousing schema that separates business data into facts and dimensions
- **Fact**: measurable, quantitative, additive values that act as independent variables by which descriptive attributes are analyzed
- **Dimension**: description attributes that provide structured labeling information for grouping and filtering data

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9 TM1 is an IBM tool that enables the generation of cost estimates with higher levels of dimensionality, precision, accountability, and reporting. The enterprise planning capabilities of TM1 are well-suited for detailed modeling of the cost of complex programs comprised of multiple products and operations, which require hundreds or thousands of variables. TM1 Performance Modeler can produce estimates under multiple model scenarios using groups of inputs that conform an internally-consistent regarding the estimate. TM1 Performance Modeler also supports cost model sensitivity and uncertainty analysis around key input variables by enabling the ingestion of parameters that define simple statistical distributions around a central estimate for each variable (i.e., minimum, median, and maximum), as well as an interface to support quick model re-estimation and Monte Carlo simulations.
3.1 Scope of the Estimate

The time frame covered by the 2020 Census LCCE is a 12-year period from fiscal years 2012 to 2023. The scope of the 2020 Census includes 35 operations. The 2020 Census operations are organized into eight major areas that correspond with the Census Bureau standard WBS as shown in Figure 4 below.

The 35 operations needed to conduct the 2020 Census are shown in Figure 5 later in this section. The graphic is organized into the major areas that correspond with the 2020 Census Program WBS shown above. Program Management, Census/Survey Engineering, and Infrastructure are combined into one general group called Support, which is shown at the top of the diagram. In addition, a separate area, Other Censuses, accounts for the Island Areas Censuses operation, which is unique to the Decennial Census programs.

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10 The term operation refers to both support and business functions. For example, Program Management is considered a support function, and Address Canvassing is considered a business function.
3.2 Cost Estimation Approach

The 2020 Census LCCE’s methodology is primarily based on a bottoms-up cost estimation approach. Other methodologies (such as historical data, subject matter expertise, and analogous systems) are used when appropriate. The 2020 Census Program cost estimation team followed the guidance contained in the GAO’s, *GAO Cost Estimating and Assessment Guide: Best Practices for Developing and Managing Capital Program Costs* (GAO-09-3SP)\(^{11}\). Specifically, the 2020 Census LCCE’s methodology aligns to GAO’s 12-step Cost Estimating Process as shown in Figure 6 below (with the steps enumerated to better demonstrate the process flow).

---

The 2020 Census LCCE utilizes an approach designed to produce a quality cost estimate in line with best practices and GAO guidelines. This calculation flow enables a clear understanding to facilitate a line-of-sight of how the assumptions, the inputs, and the processes/calculations to the outputs/results. By following the cost estimate, the process can be effectively replicated and understood. An illustration of this approach along with a brief description of each of the four primary process areas is shown in Figure 7 below.

### 3.3 Cost Estimation Methodology

The 2020 Census Program cost estimators worked with subject matter experts to obtain data and document the variables that influence the cost of the 2020 Census. Subject matter experts aided the identification of parameters associated with each variable, including historical data collected from the 2010 Census, the American Community Survey, and the 2020 Census Research and Testing Program. The 2020 Census LCCE team used the inputs after reviewing them for relevancy and credibility in consultation with Decennial Programs leadership.
The parameters for the variables were entered into the Decennial Budget Integration Tool (DBiT).\(^\text{12}\) The DBiT Enterprise Planning capability allows for modeling the cost of complex programs such as the 2020 Census. Hundreds of variables across the 35 operations were incorporated into the model to generate a total cost estimate for the 2020 Census. The cost model required three parameters for each variable (minimum, median, and maximum) derived from historical data, test results, or expert opinion. For example, one input parameter used to estimate the Nonresponse Followup workload included an estimated overall self-response rate after six weeks, using the following values: minimum of 55.5 percent, median of 60.5 percent and maximum of 65.5 percent. These values were based on findings from the 2010 Census, the American Community Survey, and the 2020 Census Research and Testing Program.

**Major Assumptions**

Table 1 lists the major assumptions, how they have changed from the December 2015 version of the LCCE, the reasons for the change, and the relative impact of the change on the overall cost.

<table>
<thead>
<tr>
<th>Item</th>
<th>Change</th>
<th>Reason</th>
<th>Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>Overall Response Rate</td>
<td><strong>Decreased</strong> from 63.5% to 60.5%</td>
<td>More conservative assumption due to increased burden for internet self-response including expectation that authentication steps will be added at the log in for internet self-response and the elimination of Save and Return functionality for self-response.</td>
<td>Major +</td>
</tr>
<tr>
<td>Major Contracts</td>
<td><strong>Increased</strong> due to re-estimation</td>
<td>Updated cost data from contract award system, reconciliation with the DOC ICE and greater ability to define requirements at low levels.</td>
<td>Major +</td>
</tr>
<tr>
<td>NRFU Pay Rates</td>
<td><strong>Reduced</strong> -$3.65 (in 2020) to $18.85 (was $22.50)</td>
<td>Updated pay analysis showed an expected lower pay rate.</td>
<td>Major -</td>
</tr>
<tr>
<td>AdCan Pay Rates</td>
<td><strong>Reduced</strong> -$5.35 (in 2019) to $17.06 (was $22.42)</td>
<td>Updated pay analysis showed an expected lower pay rate.</td>
<td>Major -</td>
</tr>
<tr>
<td>NRFU Productivity</td>
<td><strong>Decreased</strong> as result of more conservative approach</td>
<td>Use of historical 2010 data rather than research and test data.</td>
<td>Major +</td>
</tr>
</tbody>
</table>

---

12 DBiT is a system of applications developed on the IBM Cognos platform comprised of two major capabilities. Enterprise Planning is a modeling tool used for cost modeling and estimation, and the Business Intelligence capability is used to analyze and report cost information.
<table>
<thead>
<tr>
<th>In-Field AdCan</th>
<th><strong>Increased</strong> from 25% to 30%</th>
<th>Updated operational assumption based on stopping Active Block Resolution in in-office Address Canvassing.</th>
<th>Major +</th>
</tr>
</thead>
<tbody>
<tr>
<td>CQA Call Volume</td>
<td><strong>Increased</strong> by 5%</td>
<td>Expected increased calls to CQA due to elimination of Save and Return for internet self-response.</td>
<td>Major +</td>
</tr>
<tr>
<td>ACO Staffing</td>
<td><strong>Adjusted</strong> assumed staff levels to match durations</td>
<td>Updated analysis of schedule to align work with task timing.</td>
<td>Major -</td>
</tr>
<tr>
<td>Early Census Area Offices</td>
<td><strong>Increased</strong> 31 to 40</td>
<td>Updated for higher in-field Address Canvassing workload driven by pausing Active Block Resolution portion of In-Office Address Canvassing.</td>
<td>Minor +</td>
</tr>
<tr>
<td>ACO Office Size</td>
<td><strong>Increased</strong> 890 square feet</td>
<td>Updated for re-planned operations, staff increases, and use of laptops.</td>
<td>Minor +</td>
</tr>
<tr>
<td>Device as a Service</td>
<td><strong>Switched</strong> multiple operations from handhelds to laptops</td>
<td>Updated operational assumptions to align with updated operational plans.</td>
<td>Major -</td>
</tr>
</tbody>
</table>

To account for uncertainty around the various parameters, the cost estimators ran a Monte Carlo simulation. This method randomly samples parameters from a probability distribution for each variable (based on the minimum, median, and maximum) and then uses those values to calculate a cost estimate. Repeating this process thousands of times yields a distribution of cost estimates. Monte Carlo outputs (a cost estimated value) were identified at the 80th percentile level, a point estimate at which 80 percent of all the cost estimates were equal to or less than this estimate. This translates to an 80 percent probability that funding at this level will be adequate to conduct the 2020 Census.

Additionally, acknowledging the inherent uncertainty of many of these assumptions, funding has been added throughout the WBS to manage discrete risks. Known areas of risk that have been mitigated with this funding include the assumption for the response rate, the pay rates for temporary field staff, and the field supervisory-staff ratio. The 2020 Census program will manage the program to the estimates included in the LCCE, and will only need to utilize the additional funding, if these estimates prove to be incorrect. This is shown further in section 3.5.

### 3.4 Independent Cost Reviews

The 2020 Census LCCE has been compared to two independent cost estimates (ICEs)\(^\text{13}\) in its developmental history. GAO treats an ICE as a useful tool to determine the fidelity of a cost estimate. Specifically, the GAO states:

\(^{13}\text{An ICE is conducted by an independent organization using the same technical and procurement information used to develop the POE. The ICE provides an unbiased test of a LCCE’s reasonableness in terms of cost, risk, etc.}\)
An ICE is considered one of the best and most reliable validation methods. ICEs are typically performed by organizations higher in the decision-making process than the office performing the baseline estimate. They provide an independent view of expected program costs that tests the program office’s estimate for reasonableness. Therefore, ICEs can provide decision-makers with additional insight into a program’s potential costs – in part, because they frequently use different methods and are less burdened with organizational bias. Moreover, ICEs tend to incorporate adequate risk and, therefore, tend to be more conservative in forecasting higher costs than the program office.  

In both comparisons of the cost estimates, there were differences in individual cost categories, but the overall (total) cost was similar between the ICE and the 2020 Census Program Office Estimate (POE). The primary reason for the differences were the estimating method and the different application of contingency and uncertainty. The results of the ICE to POE comparisons are shown in Figure 8 below.

Following the completion of the first POE by the Decennial Budget Office in early 2016, the Census Bureau’s Office of Cost Estimation and Assessment (OCEAA) conducted the first ICE beginning in FY 2015 and ending prior to the 2020 Census Milestone 2 Review in June 2016. The differences between the point estimate (direct cost) was approximately two percent. The OCEAA ICE used more conservative costs for mitigating risks and uncertainty, and therefore the difference for mitigating risk and uncertainty was just over 30 percent. The total delta between the May 2016 POE and the June 2016 ICE was 6.4 percent. The differences between the ICE and the POE were reconciled through a series of meetings between the OCEAA ICE team and the 2020 Census LCCE. The information from the reconciliation was used to update the POE.

The second comparison of the 2020 Census POE to an ICE was conducted during September 2017. The second ICE, which was completed in August of 2017, was conducted by the DOC’s Office of Acquisition Management (OAM). Following reconciliation with the 2020 Census POE, it informed the LCCE released by the Office of the Secretary (OS). The OAM ICE utilized a top-down approach that made use of newly available Census data on IT and contract costs. The difference in direct costs (the point estimate) was over nine percent; largely due to more direct reliance on 2010 Census historical operational assumptions. However, the OAM ICE assumed less costs to mitigate risk and uncertainty. The overall difference was approximately 4.2 percent.

Following reconciliation between the April 2017 POE and the August 2017 ICE, additional reconciliation occurred with the Office of the Secretary estimate in September 2017. The difference in risk and uncertainty between this latest estimate and the April 2017 POE accounted for the addition of $1.1B in Secretarial-controlled contingency. The results of the reconciliation

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15 A POE is the official projected cost for a system or program that is formally submitted to justify budget requirements to higher headquarters, Congress, GAO and others.
between the DOC OAM/OS ICE and the April 2017 version of the 2020 Census POE are shown in the bottom row of the table and became the November 2017 2020 Census POE being presented in this document. The delta between the two estimates is under one percent.

<table>
<thead>
<tr>
<th>Date</th>
<th>Model</th>
<th>Developer</th>
<th>Direct Cost</th>
<th>Delta</th>
<th>Risk &amp; Uncertainty</th>
<th>Delta</th>
<th>Total Cost</th>
<th>Total Delta</th>
</tr>
</thead>
<tbody>
<tr>
<td>May-16</td>
<td>POE</td>
<td>DBO</td>
<td>$10,989</td>
<td>-2%</td>
<td>$1,323</td>
<td>-31%</td>
<td>$12,312</td>
<td>-6%</td>
</tr>
<tr>
<td>Jun-16</td>
<td>ICE</td>
<td>OCEAA</td>
<td>$11,229</td>
<td>N/A</td>
<td>$1,931</td>
<td>N/A</td>
<td>$13,160</td>
<td>N/A</td>
</tr>
<tr>
<td>Apr-17</td>
<td>POE</td>
<td>DBO</td>
<td>$10,284</td>
<td>-10%</td>
<td>$3,196</td>
<td>106%</td>
<td>$13,480</td>
<td>-4%</td>
</tr>
<tr>
<td>Aug-17</td>
<td>ICE</td>
<td>DOC OAM</td>
<td>$11,406</td>
<td>N/A</td>
<td>$1,551</td>
<td>N/A</td>
<td>$14,074</td>
<td>N/A</td>
</tr>
<tr>
<td>Sep-17</td>
<td>ICE</td>
<td>DOC OAM/OS</td>
<td>$11,406</td>
<td>N/A</td>
<td>$4,218</td>
<td>N/A</td>
<td>$15,625</td>
<td>N/A</td>
</tr>
<tr>
<td>Nov-17</td>
<td>POE</td>
<td>DBO</td>
<td>$11,405</td>
<td>0%</td>
<td>$4,220</td>
<td>0%</td>
<td>$15,625</td>
<td>0%</td>
</tr>
</tbody>
</table>

Figure 8: Comparison to Independent Cost Estimates

3.5 Cost Sensitivity Analysis

After the updated point estimate was compared to the ICE (Step 7 of the GAO 12-step cost estimation process) and updated as a result, the point estimate cost was then adjusted for risk and uncertainty (to include contingency) in Step 8 and Step 9 of the GAO process. A description of the program risk and uncertainty in the form of Secretarial-Controlled Contingency is outlined below.

Program Risk

Program Risk comprises two areas of costs to mitigate risk in the estimate – Monte Carlo Uncertainty and Discrete Risks – and totals $1.42 billion spread across the WBS level 2 framework.

Monte Carlo Uncertainty

To account for uncertainty around the various parameters, the cost estimators ran a Monte Carlo simulation. This method randomly samples parameters from a probability distribution for each variable (based on the minimum, median, and maximum) and then uses those values to calculate a cost estimate. Monte Carlo uncertainty is applied to the Program Management WBS element. The Program Management WBS covers elements associated with the definition and implementation of program management policies, processes, and the control functions for

16 Delta columns represent percent change for each POE relative to its proximal ICE.
planning and implementing the 2020 Census to ensure an efficient and well-managed program. The estimated costs for Monte Carlo uncertainty was approximately $292M.

**Discrete Risks**

Discrete risks are those specifically referenced in the 2020 Census Program Risk Register. Each of these official risks have their own risk range assigned to them in the LCCE. The following discrete program risks have been reflected in the risk-adjusted cost estimate via additional sensitivity analyses:

1. Self-response rates are critical variables with expected large impacts in the Response Data life-cycle costs. The self-response rate was assumed to decline below modeled levels, which causes an increase in the Nonresponse Followup Workload. The impact of this risk was estimated by decreasing self-response rates from 60.5% to 55.0%. The estimated cost for this risk was $247.6M.

2. The cost of field operations is considered sensitive to the size and cost of new recruits in specific geographic areas, so this risk models recruitment size and wage rate of the temporary workforce as not adequate for a given geographic area. This risk was modeled by increasing the wage rate of the temporary workforce by $0.50. The estimated cost for this risk was estimated to be $76.7M.

3. The Census Bureau has postulated a significant increase in the efficiency of field operations, with a higher Enumerator-to-Supervisor staffing ratio than in the 2010 Census. This assumption used to generate the point cost estimate is contingent on the proper implementation and management of resources, and the risk that planned efficiencies from field management staffing are inadequate to support the temporary workforce. The impact of this risk was estimated by assuming a decrease in the Enumerator-to-Management staffing ratio from 20:1 to 16:1. The cost for this risk was estimated to be $44.4M.

4. Risks identified in the 2020 Life-Cycle Risk Register were analyzed, quantified, integrated into the estimate; mitigations were also evaluated and incorporated in the estimate when relevant, as part of the 2020 LCCE process. The Census Bureau Enterprise Risk Management (ERM) process was followed to ensure the integration/linkage of the 2020 Decennial Program risks into the cost estimation process. The costs for these risks was estimated to be $763.5M. Examples of the risks in the risk register include cybersecurity incidents, system scalability, and internet data collection.

Careful research, testing and planning throughout the decade has led the Census Bureau to establish a higher self-response rate and operate effectively with a lower wage and higher supervisory ratio. However, due to the cost sensitivity of each of these assumptions, further evidence is needed before the Census Bureau can retire these risks and reduce the estimates appropriately and responsibly without endangering a high quality 2020 Census. The current supervisory to staffing ratio assumption is the assumption that can be refined the most through additional testing. As such, it will be managed to 20:1 in the 2018 End-to-End Census Test, and it is likely the observations and analysis of its effectiveness will inform and refine the estimates for this discrete risk.
Even with research, testing and planning, response rates and wages are more difficult to predict with precision, as the exact value for each that will be experienced in the 2020 Census lie further from the direct control of the 2020 Census program managers. The response rate could be affected unpredictably by both public and private data breaches, the public’s overall opinion of the government, and the Census Bureau’s commitment to confidentiality. Wage rates for a temporary work force are impacted by the strength of the economy and the competitiveness of the job market. As a result of these external factors, it is unlikely these risks could be retired and the corresponding estimates included for these discrete risks reduced until very late in the cycle. The Census Bureau will continue to manage the 2020 Census Program to the objective assumptions contained within the LCCE that is based on the higher threshold assumptions noted in items one through three above and be continuously monitoring external conditions and their impact on the self-response rate and wage rate assumptions.

Even though the program may carry these risks throughout the entire lifecycle, the Bureau is committed to managing this risk and minimizing the use of contingency funding. For example, the Census Bureau will invest in a robust communications and partnership program designed to promote self-response through accurate and timely information about data security and confidentiality.

Secretarial-Controlled Contingency

The Secretarial-Controlled Contingency represents the unknown-unknown category of risk to account for unforeseen risks, such as a natural disaster driving residents of an area away from their residences leading up to Census Day for the 2020 Census. This category is a 10 percent addition to the risk-adjusted cost. The Department of Commerce will only approve use of this contingency following a formal governance process involving the Department’s oversight bodies. The cost assigned to the unknown-unknown risk was $1.2B.

At the end of the risk and uncertainty analyses, the risks and uncertainty were added to the point estimate to produce a total risk-adjusted cost estimate for the 2020 Census Program the life-cycle cost was determined to be approximately $15.6B.

4. LCCE Summary

4.1 The Cost Estimation Results

This section discusses the summary costs of the 2020 Census LCCE. The figure below presents estimated life-cycle cost for each of the WBS level-2 elements of the Census Bureau WBS. Response Data, which includes most costs associated with the actual collection of data by multiple means, and other supporting activities such as printing, distribution, and questionnaire support, accounts for over one third of the total cost of the 2020 Census at $5.8B. Infrastructure, with a cost of $3.8B, is the second largest cost component; this WBS element includes the required IT and field operations investments, as well as the infrastructure required to support
logistic management and service centers. Census Survey and Engineering, which includes systems engineering and integration, system security, content and forms design, and language services, comes third with $1.8B, followed by $1.3B in program management and $1.2B in contingencies. Note, the years FY12-FY16 are actuals from Commerce Business System (CBS) taken in August 2017. The cost estimate summary is shown in Table 2 below.

Table 2: Cost Estimate Summary ($K)

<table>
<thead>
<tr>
<th>Fiscal Year</th>
<th>1 Program Management</th>
<th>2 Census / Survey Engineering</th>
<th>3 Frame</th>
<th>4 Response Data</th>
<th>5 Published Data</th>
<th>6 Test, Evaluation, Special Censuses</th>
<th>7 Infrastructure</th>
<th>8 Secretarial-Controlled Contingency</th>
<th>Grand Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>FY 2012</td>
<td>$8,553</td>
<td>$15,986</td>
<td>$3,114</td>
<td>$5,574</td>
<td>$1,082</td>
<td>$17,119</td>
<td>$11,584</td>
<td>$63,012</td>
<td></td>
</tr>
<tr>
<td>FY 2013</td>
<td>$8,256</td>
<td>$8,076</td>
<td>$3,946</td>
<td>$7,760</td>
<td>$3,428</td>
<td>$25,590</td>
<td>$41,481</td>
<td>$98,537</td>
<td></td>
</tr>
<tr>
<td>FY 2014</td>
<td>$19,660</td>
<td>$18,411</td>
<td>$26,613</td>
<td>$18,163</td>
<td>$11,175</td>
<td>$48,076</td>
<td>$85,330</td>
<td>$227,427</td>
<td></td>
</tr>
<tr>
<td>FY 2015</td>
<td>$40,651</td>
<td>$16,186</td>
<td>$26,133</td>
<td>$55,527</td>
<td>$14,830</td>
<td>$94,125</td>
<td>$92,838</td>
<td>$340,289</td>
<td></td>
</tr>
<tr>
<td>FY 2016</td>
<td>$84,797</td>
<td>$117,667</td>
<td>$82,232</td>
<td>$91,348</td>
<td>$31,940</td>
<td>$85,330</td>
<td>$159,132</td>
<td>$649,641</td>
<td></td>
</tr>
<tr>
<td>FY 2017(^\d)</td>
<td>$63,214</td>
<td>$199,902</td>
<td>$58,632</td>
<td>$246,285</td>
<td>$20,857</td>
<td>$39,080</td>
<td>$127,723</td>
<td>$755,693</td>
<td></td>
</tr>
<tr>
<td>FY 2018(^\d)</td>
<td>$60,210</td>
<td>$257,117</td>
<td>$98,402</td>
<td>$218,367</td>
<td>$18,078</td>
<td>$54,544</td>
<td>$281,355</td>
<td>$1,037,073</td>
<td></td>
</tr>
<tr>
<td>FY 2019</td>
<td>$310,227</td>
<td>$356,264</td>
<td>$312,228</td>
<td>$1,088,377</td>
<td>$17,130</td>
<td>$76,265</td>
<td>$977,298</td>
<td>$314,000</td>
<td>$3,451,788</td>
</tr>
<tr>
<td>FY 2020</td>
<td>$486,771</td>
<td>$343,959</td>
<td>$64,104</td>
<td>$3,894,973</td>
<td>$13,191</td>
<td>$180,700</td>
<td>$1,710,421</td>
<td>$669,000</td>
<td>$7,363,119</td>
</tr>
<tr>
<td>FY 2021</td>
<td>$107,776</td>
<td>$263,227</td>
<td>$36,018</td>
<td>$118,368</td>
<td>$33,047</td>
<td>$122,594</td>
<td>$232,745</td>
<td>$91,000</td>
<td>$1,004,776</td>
</tr>
<tr>
<td>FY 2022</td>
<td>$48,561</td>
<td>$165,900</td>
<td>$14,017</td>
<td>$28,513</td>
<td>$36,679</td>
<td>$35,929</td>
<td>$59,771</td>
<td>$39,000</td>
<td>$428,370</td>
</tr>
<tr>
<td>FY 2023</td>
<td>$25,097</td>
<td>$59,770</td>
<td>$12,474</td>
<td>$17,819</td>
<td>$17,656</td>
<td>$16,060</td>
<td>$37,387</td>
<td>$19,000</td>
<td>$205,263</td>
</tr>
<tr>
<td>Grand Total</td>
<td>$1,263,772</td>
<td>$1,822,466</td>
<td>$737,914</td>
<td>$5,791,073</td>
<td>$219,093</td>
<td>$792,608</td>
<td>$3,817,063</td>
<td>$1,181,000</td>
<td>$15,624,989</td>
</tr>
</tbody>
</table>

4.2 Detailed Costs by WBS Category

The figures below chart the level-3 WBS elements that make up each of the level-2 WBS elements discussed above, along with one or more bullet points that stress the key recommendations or takeaways depicted in the charts.

As illustrated in Figure 9 below, $10.8B (close to 70 percent) of the projected $15.6B 2020 Census costs are expected to be incurred in FY19 to FY20; this highlights the significant concentration of expenditure in those years, as well as the importance of prior preparation to deploy investments and operations efficiently over this period of intense activity, and the potential for significant deviations in cost.

\(^\d\) FY17 reflects the enacted spending profile as of August 2017.
\(^\d\) FY18 reflects the $187M budget adjustment to the original $800.2M for an adjusted total of $987M. An approximately $50M was added for contingency for a total of $1,037M.
Program Management Costs

The program management element, which includes all activities that implement and support policies, processes, and control functions oriented to improve the efficiency of operations and management of the program, accounts for $1.26B over the lifespan of the 2020 Census Program (above eight percent of total program cost). The program management costs are shown in Figure 10 below.

Program management costs to mitigate risk and uncertainty are the largest program management cost and are especially high during the program implementation phase (FY19-FY20). This area includes the Monte Carlo uncertainty funding, as well as certain discrete risks from the risk
register that could require the inclusion of additional program oversight, scheduling, or similar program management efforts.

**Figure 10: Program Management Costs by WBS Level 3**

**Census / Survey Engineering Costs**

Census/Survey Engineering costs are estimated at $1.8B over the lifespan of the 2020 Census Program, representing around 12 percent of the life-cycle cost of the program. An overview of the Census / Survey Engineering costs is shown below in Figure 11.

Systems Design and Integration (SEI) is by far the main driver of program costs associated with Census/Survey Engineering. This is consistent with expectations for a program of this size, which is developing an integrated system-of-systems to complete its innovative redesign. The concentration of SEI costs around the implementation phase of the program is indicative of potential high technical integration and testing costs and risks to deliver the 2020 Census system of systems. The total life-cycle cost for the Technical Integration contract in the LCCE is $1.5B (including overhead).
Census/Survey design is the second component of costs under this WBS category. Though much smaller than SEI, it includes the operational (readiness, integration, and testing) and demographic (content and forms) design of surveys.

Figure 11: Census / Survey Engineering Costs by WBS Level 3

Frame Costs

Frame activities are expected to cost the Decennial Program around $738M, which represent 4.7 percent of the life-cycle cost of the program. These are the costs spent by the program with the goal of developing a high-quality address and geospatial frame that serves as the universe for the enumeration activities. Figure 12 below provides an overview of the Frame costs.

Address frame, the delivery of a complete and accurate address list and spatial database for enumeration, including the type and characteristics of each living quarter, is the main driver of the cost associated with frame activities, followed by geospatial frame, which provides the geographic foundation to support data collection and tabulation activities.

The spike in address frame in FY19 is associated with in-field address canvassing executed prior to the deployment of 2020 Census field enumeration operations.
Response Data Costs

The Response Data, a cost of $5.8B (approximately 37 percent of the total 2020 Census estimate), is the largest driver of costs for the Decennial Census Program. It consists of activities to perform the collection of information from 2020 Census respondents by multiple means of communication, including; all operations associated with the gathering of responses, management of cases, and initial processing of the data. Figure 13 below provides an overview of the Response Data costs. One of the larger cost drivers of this area are the costs for Census Questionnaire Assistance (CQA). The life-cycle cost of CQA contract is included in the LCCE is $817M (including overhead).

The concentration of expected expenses in FY20 reflects the nature of Response Data, which comprises a large portion of the activities connected to the actual deployment of resources in the field to perform the collection of Census data.

Over half of the Response Data cost in FY20 correspond to computer-assisted personal interviewing (CAPI) files, which includes nonresponse followup; one of the costliest activities of the 2020 Census. Computer-assisted telephone interviewing (CATI) files, or the initial response processing (which includes Census questionnaire assistance), is the second largest cost in FY20.
This is followed by advertising and partnerships campaigns grouped under Respondent Outreach activities. The costs for advertising and partnership in the LCCE is $822M (including overhead).

![Figure 13: Response Data Costs by WBS Level 3](image)

**Published Data Costs**

Published Data is the least expensive level-2 WBS activity with life-cycle costs of $219M, which represents less than 1.5 percent of the 2020 Census life-cycle cost. Even though Published Data is a relatively inexpensive component, it is a high-value one that includes activities that support imputation of data and adjustments, data review and analysis, tabulation, and data product dissemination. An overview of the Published Data costs is shown in Figure 14 below.

The highest cost within Published Data is Data Products, which includes the preparation, review, approval, and dissemination of final data products; it spikes in FY16 and FY22, when the most relevant intermediate and final products are completed and released. Tabbed data, which includes data reviews, analysis, and tabulation is the second highest cost within this category; its time profile is smoother than Data Products given the more continuous nature of the activities under it.

CEDSCI, the system that will be used to disseminate the 2020 Census data, is not part of this cost estimate. CEDSCI is an enterprise system. Its separate cost estimate is maturing as the requirements are further defined as supporting contracts are awarded.
Test, Evaluation and Special Census Costs

Test, Evaluation, and Special Censuses is a level-2 WBS that account for costs that approach $793M or five percent of the 2020 Census life-cycle cost. This level-2 WBS element comprises two relatively unrelated sets of activities: Test and Evaluation, and Special Censuses. Figure 15 illustrates the Test and Evaluation, and Special Censuses costs.

Test and Evaluation assesses the quality of the 2020 Census and prepares the Decennial Program for the 2030 Census. It includes coverage measurement, as well as evaluations and experiments. It covers the post-enumeration survey and sample, the identification of matches between the 2020 Census and the survey, an independent collection of information for the coverage measurement sample, the development of measures of success, and the early planning activities to support the transition and design of the 2030 Census. Test and Evaluation accounts for the large majority of the $793M in costs associated with this level-2 WBS element. Coverage measurement, Census tests, and research and planning are the activities that require the largest uses of funds within Test and Evaluation.

Special Censuses, includes the enumeration of residents of Islands Areas including American Samoa, Northern Mariana, Guam, and Virgin Islands. The cost of Special Censuses is a relatively small portion of the total cost of this level-2 WBS element.
Infrastructure Costs

Infrastructure is the second highest cost element at the level-2 of the WBS with total costs that exceed $3.8B or almost one quarter of the 2020 Census life-cycle cost. Approximately half of those costs are expected to be incurred in FY20 when field office infrastructure, staff, office space, and equipment uses peaked, along with non-HQ staffing operations, such as training, recruiting, and onboarding. This includes the cost of the Field IT infrastructure contract, which has yet to be awarded. The lifecycle cost for this contract in the LCCE is $416M (including overhead). Figure 16 below shows the Infrastructure costs.

Consistent with the peak infrastructure spending in FY20, Program Risk is included in the prior-years to mitigate potential operational risks described previously. Program Risk costs are projected in FY19 and FY20 to account for the risks with deployment and execution.

IT infrastructure, though not as significant as other Infrastructure components, peaks earlier than those (in FY16 and FY18), as it needs to be ready for deployment before the additional staff is hired and the space and other infrastructure is fielded.

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19 This includes Area Census Offices (ACO) and Regional Census Centers (RCC)
Secretarial-Controlled Contingency Costs

The DOC has established a contingency cost element to account for unknown-unknown risks, which would include the impact to the 2020 Census operations of an unforeseen event, such as a natural disaster significantly affecting a large area of the country driving up the costs of accurately enumerating those areas. Figure 17 provides an overview of the scale and time frame in which the Secretarial-Controlled Contingency costs are allotted in the 2020 Census LCCE.
4.3 IT Costs

IT costs are spread throughout the 2020 Census WBS. A cross cut of the IT cost in the 2020 Census is described in this section.

The cost estimators developed a multi-step process to estimate the IT components of each operation and WBS element. This process does not apply uniformly to all IT components, but includes the integration of past execution data, as well as cost estimates produced parametrically and/or by analogy with past estimates or similar systems. The LCCE team utilized the list of 52 systems developed by Census Bureau’s Enterprise Architecture Group (EAG), along with other IT elements to achieve a comprehensive estimate of all IT costs in the 2020 Census. To describe this, two categories were developed by the LCCE team to align the IT costs to the LCCE WBS. These categories and their descriptions are shown in Figure 18 below.

Please note that all the costs shown in this section includes overhead.
<table>
<thead>
<tr>
<th>IT Cost Category</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>2020 IT Systems and Services</strong></td>
<td>Systems on the EAG’s 52 systems list that support the 2020 census and the service contracts that support IT development, maintenance, etc. (such as the Technical Integration contract)</td>
</tr>
<tr>
<td><strong>2020 CEDCaP</strong></td>
<td>An enterprise system for data collection and processing that is being developed to support data collection and response processing first for the 2020 census and later other Census Bureau surveys and censuses</td>
</tr>
</tbody>
</table>

Figure 18: 2020 Census IT Cost Categories

The graph below in Figure 19 illustrates the breakout of costs by 2020 IT Services and Systems and 2020 CEDCaP costs. In this graph, the 2020 IT Services and Systems costs are the largest element of IT costs in the 2020 Census LCCE.

The total estimated cost for the IT costs is $4.97B.
Figure 19: IT Costs by Fiscal Year

2020 IT Systems and Services Cost Details

The 2020 IT Systems represent system capabilities funded by the 2020 Census. These 52 systems include many small and relatively inexpensive systems, including Decennial Response Processing System and Integrated Logistics Management System, but also includes larger and more expensive systems, including Census Schedule A Hiring, Recruiting and Payroll System, Geographic imagery and matching systems, and the Decennial Tabulation System.
Supporting the development and integration of these systems are the 2020 IT Services, which largely contain contract costs, but also includes infrastructure costs. The major contracts in this category include Decennial Device as a Service (DaaS), Field IT Deployment, FITd, and Technical Integration. It also includes the cost of IT infrastructure provided in the Census Bureau’s data center related to the 2020 Census and the costs related to security assessment and testing prior to the issuance of an authority to operate.

**CEDCaP Cost Details**

CEDCaP is the enterprise system that supports data collection for not only the decennial census but other censuses as well. This is a major investment that peaks in FY17 and FY18 to support the 2018 End-to-End Test and lay the foundation for the ramp up to the 2020 decennial census. The CEDCaP program includes the development of key systems for the 2020 Census, including the Operational Control Systems, Internet Self-Response, and the Enumeration instrument for Nonresponse Followup. These are key to modernization of the 2020 Census and represent the future of how decennial censuses will be conducted. The lifecycle cost of the CEDCaP program has been estimated separately from the rest of the 2020 Census by certified cost estimators in the program office, and is an input to the 2020 Census lifecycle cost estimate.

### 4.4 LCCE Major Cost Drivers

The cost of the 2020 Census LCCE are largely driven by a relatively few areas. The primary cost drivers are those associated with Major Contracts and CEDCaP, Field Operations, Overhead (nonCEDCaP), Program Risks and Secretarial-Controlled Contingency. This is illustrated in Figure 20 below that shows the individual and cumulative percent of costs. Note that the 18 remaining cost categories account for a small portion (approximately 20 percent) of the total cost.

<table>
<thead>
<tr>
<th>Cost Category</th>
<th>Cost ($K)</th>
<th>Percent</th>
<th>Cumulative Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>04. Major Contracts and CEDCaP</td>
<td>$ 4,056,500</td>
<td>25.9%</td>
<td>25.9%</td>
</tr>
<tr>
<td>02. Field Operations</td>
<td>$ 2,050,400</td>
<td>13.1%</td>
<td>39.0%</td>
</tr>
<tr>
<td>03. Overhead (nonCEDCaP)</td>
<td>$ 1,477,200</td>
<td>9.4%</td>
<td>48.5%</td>
</tr>
<tr>
<td>01. Program Risk</td>
<td>$ 1,426,900</td>
<td>9.1%</td>
<td>57.6%</td>
</tr>
<tr>
<td>01. Secretarial-Controlled Contingency</td>
<td>$ 1,181,000</td>
<td>7.6%</td>
<td>65.2%</td>
</tr>
<tr>
<td>09. HQ LOE</td>
<td>$ 757,900</td>
<td>4.8%</td>
<td>70.0%</td>
</tr>
<tr>
<td>05. ACO Staffing</td>
<td>$ 696,700</td>
<td>4.5%</td>
<td>74.5%</td>
</tr>
<tr>
<td>06. Program Management</td>
<td>$ 515,600</td>
<td>3.3%</td>
<td>77.8%</td>
</tr>
<tr>
<td>07. Staffing Operations - CSHarP</td>
<td>$ 500,900</td>
<td>3.2%</td>
<td>81.0%</td>
</tr>
<tr>
<td>08. Other</td>
<td>$ 2,978,500</td>
<td>19.0%</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

*Figure 20: 2020 Census LCCE Major Cost Drivers*
Figure 21 below provides a summary of the top level-3 WBS cost elements across the program. This chart highlights the mission-oriented nature of the 2020 Census in that Response Data-related cost elements (as denoted by the number 4 before the cost element title) figure prominently in the top cost elements at level-3 of the WBS. The other major cost elements are Census Survey Engineering and Program Management. This fact demonstrates the scope and scale of the design and management challenges associated with the 2020 Census operations.

Note that in the figure below, the costs contain overhead.

Costs Drivers by Budget Object Class

The federal government’s standard chart of accounts utilizes a standard set of budget categories called Budget Object Classes (BOC). Funds are allocated using BOC. The BOC provide a view of the 2020 Census LCCE costs by resource category. Figure 22 below provides the top-five costs by BOC.
Another view of the major cost elements by BOC is shown in Figure 23 below. This graph highlights the cost significance of contracted services within the 2020 Census LCCE.
5. Conclusion

The 2020 Decennial Census is a large and complex program that has a 12-year life-cycle and a projected total cost of $15.6B. The estimate includes the mobilization of space, people and infrastructure across the entire United States and its territories.

The 2020 Census LCCE is a key tool for management to justify budget requirements, support resource allocation decisions, and to develop an informed understanding of the projected costs and risks of their programs. A reliable LCCE will increase the probability of program success. The Census Bureau will be using the 2020 Census LCCE to focus on delivering a cost-effective and high-quality census.

Despite the challenges of developing, improving and maintaining a reliable cost estimate for a program as large and complex as the 2020 Decennial census, the Census Bureau is using certified cost estimators, independent cost estimators, advanced tool sets, and ongoing enhancements to internal controls to continuously improve the cost estimate. This commitment is underscored by the close working relationship that the Decennial Programs Directorate has established with both GAO and the DOC. The Census Bureau will continue to build upon the current version of the 2020 Census LCCE and will be regularly updating the cost estimate with further refined data and further strengthened internal controls.
The original version of the appendix has been revised.
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Introduction

BACKGROUND
Since 1790, a national census of the U.S. population has been conducted every 10 years, as required by the U.S. Constitution. Additional information beyond the population count has been collected with each census in response to the challenges facing the nation and a national desire to understand ourselves.

In the 20th century, most addresses received a “short” form, while a portion of addresses received a more detailed “long” form. The Census 2000 short form was designed to collect basic demographic and housing information (i.e., age, race, gender, relationship, and tenure) to be used for apportionment and redistricting. The long form sent to approximately 1 in 6 households collected social, housing, and economic information (i.e., citizenship, educational attainment, disability status, employment status, income, and housing costs) that was used to plan and determine funding for a wide array of federal, state, local, and tribal programs.

Since 2005, in order to provide communities, businesses, and the public with the detailed long-form information more frequently, these data have been collected monthly (and released annually) through the American Community Survey (ACS).1 This innovation enabled the 2010 Census to be a “short-form-only” census. Decoupling the collection of short- and long-form data allowed the U.S. Census Bureau to focus decennial census efforts on the constitutional requirements to produce a count of the resident population, while employing technology in both collections to improve efficiencies, improve accuracy, and reduce costs. The result has been the dissemination of more current and detailed information than has ever been available.

The 2020 Decennial Census Program, comprised of the 2020 Census and the ACS, will provide an official count through a “short-form-only” census, as well as a portrait of communities counted across the nation through data collected by the ACS. This program is the only data-gathering effort that collects information from enough people to produce comparable data for every geographic area recognized by the Census Bureau.

SUBMISSION OF SUBJECTS PLANNED FOR THE 2020 DECENNIAL CENSUS PROGRAM
Section 141(f) of the Census Act requires that the subjects to be included in the next census be submitted to Congress no later than 3 years before the census date. The contents of this handbook describe the subjects that will be asked on the 2020 Census and the ACS.

The Census Act also requires that the questions to be included in the next census be submitted to Congress no later than 2 years before the census date. A document that meets that requirement for the 2020 Census and the ACS will be submitted to Congress by March 31, 2018.

ABOUT THE SUBJECTS PLANNED FOR THE 2020 DECENNIAL CENSUS PROGRAM
Throughout each decade, regular content reviews are conducted to ensure that the information collected through the decennial census program is required by federal programs. Beginning after the 1990 Census, the U.S. Office of Management and Budget (OMB) in conjunction with the Census Bureau, asked federal agencies to provide information describing their data needs. This information, updated each decade by subsequent changes to federal legislative requirements, is used to evaluate content considered for the decennial census program.

To prepare for the 2020 Census, OMB and the Census Bureau embarked on a comprehensive review including chartering the Interagency Council on Statistical Policy (ICSP) Subcommittee on the ACS and conducting the 2014 ACS Content Review. This effort was designed to examine and confirm the value of each question on the ACS, and to confirm and update the statutory and regulatory authority for the questions with federal agencies. In 2016, the Census Bureau asked federal agencies to provide any updates to this documentation.

The resulting information about federal uses is presented throughout the descriptions of the subjects on the following pages. These descriptions are designed to give the reader a clear understanding of 1) the relationship between questions asked of respondents and the summarized data that are released in published tables, 2) how federal agencies use the resulting data, and 3) the benefits of the data at the community level.

---

1 The ACS also collects short-form data on its questionnaire. However, ACS asks for basic demographic and housing information from a sample of households, while the decennial census asks for basic demographic and housing information from all households.
Protecting the Information Collected by These Subjects

The Census Bureau has an obligation to produce accurate, relevant statistics about the nation’s economy and people, but we recognize that the information collected in these subjects is often private. We depend on cooperation and trust, and promise to protect the confidentiality of this information.

Federal law protects this information; Title 13 of the U.S. Code protects the confidentiality of all collected information. Violating this law is a crime with severe penalties. Please visit <www.census.gov/about/policies/privacy/data_protection/federal_law.html>.

**OUR PRIVACY PRINCIPLES**

We recognize the value of respondent trust, and we believe that when a person answers the 2020 Census or the ACS we must serve as caretakers of the information. The Census Bureau’s Privacy Principles remind us of this promise and help ensure the protection of respondent information throughout all of our activities.

The Privacy Principles are our guidelines. They help us as we determine content to consider respondents’ rights and concerns. Every principle embodies a promise to the respondent.

**Necessity: Do we need to collect information on this subject?**

Every time we prepare to ask a question, we determine whether the information is truly necessary. All of the information we collect is used for federal programs.

- We promise to collect only information necessary for each survey and census.
- We promise that we will use the information only to produce timely, relevant statistics about the population and the economy of the United States.

**Openness: Do respondents know why we are collecting this information?**

We collect information only for statistical purposes, and it is never used to identify individuals. Before participating, respondents have the right to know why we are conducting the survey or census, why we are asking specific questions, and the purposes for which the information will be used.

- We promise to inform respondents about the purpose and uses for every survey or census we conduct before respondents provide answers.

**Respectful treatment of respondents: Are our efforts reasonable and do we treat people with respect?**

- We promise to minimize the effort and time it takes for respondents to participate in the data collection by efficient designs.
- We promise to use only legal, ethical, and professionally accepted practices in collecting data.
- We promise to ensure any collection of sensitive information from children and other sensitive populations does not violate federal protections for research participants and is done only when it benefits the public good.

**Confidentiality: How do we protect this information?**

In addition to removing personally identifiable information (i.e., names, telephone numbers, and addresses) from our data files, we use various approaches to protect personal information—including computer technologies, statistical methodologies, and security procedures.

Our security measures ensure that only a restricted number of authorized people have access to private information and that access is only granted to conduct our work and for no other purposes. Every person who works with census confidential information collected by the Census Bureau is sworn for life to uphold the law.

Violating the confidentiality of a respondent is a federal crime with serious penalties, including a federal prison sentence of up to 5 years, a fine of up to $250,000, or both.

- We promise that every person with access to respondent information is sworn for life to protect respondent confidentiality.
- We promise that we will use every technology, statistical methodology, and physical security procedure at our disposal to protect respondent information.
Operational Questions

Some operational questions will appear on the 2020 Census and American Community Survey that will not result in published counts or estimates. These questions are asked to better administer the data collection process and to ensure greater accuracy of the data collected through the other subjects.

**A person's contact information, including name and phone number, are requested in case someone must be reminded to complete their response or to verify information in a follow-up operation.**

Contact information is not part of published estimates and is carefully protected, as mandated by federal law, to respect the personal information of respondents.

**An address is verified or requested to ensure that the data collected from the people in each household are included in the correct place.**

The U.S. Census Bureau is required to provide state legislatures with the small-area census population tabulations necessary for legislative redistricting. For example, a county count will be a summary of the data collected from all of the addresses in that county. To ensure that a household’s data are included with the correct town, county, and state counts, we need to ensure that we know where the information was collected. Addresses are not part of published tabulations and are carefully protected, as mandated by federal law, to respect the personal information of respondents.

**The 2020 Census questions about the number of people in the home, whether anyone was included who does not usually live or stay there, or whether anyone who does usually live or stay there was forgotten, are used to ensure that everyone is counted once, only once, and in the right place.**

The first U.S. decennial census in 1790 established the concept of "usual residence" as the main principle in determining where people were to be counted. The Census Bureau uses residence criteria to determine whom to count and where, especially because the place where a person lives and sleeps most of the time is not necessarily the same as the person’s voting residence or legal residence. Asking these additional questions helps ensure that no one is missed, people are not counted in multiple locations, and that people are included in the right place.

**The 2020 Census questions about maritime vessels, military living quarters, and other group quarters facilities, such as college or university student housing, nursing/skilled nursing facilities, group homes, emergency and transitional shelters for people experiencing homelessness, and other such locations, are used to better administer the data collection process in group living situations.**

Asking these additional questions helps ensure accurate classification of group quarters which is a part of the Census Bureau’s mission to ensure that everyone is counted once, only once, and in the right place.
### Selected Statutory Uses of Operational Questions Data

<table>
<thead>
<tr>
<th>Organization</th>
<th>Statutory Use</th>
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</thead>
<tbody>
<tr>
<td>U.S. Department of Commerce, Bureau of the Census</td>
<td>The Census Act, 13 USC § 141(c)</td>
</tr>
<tr>
<td>U.S. Department of Commerce, Bureau of the Census</td>
<td>The Census Act, 13 USC § 181</td>
</tr>
</tbody>
</table>
Subjects Planned for the 2020 Census and the American Community Survey
Age

Age asked since 1790.

**AGE DATA HELP COMMUNITIES:**

**Provide Assistance to Older Americans**

Knowing how many people in a community are aged 60 and older helps local officials provide programs and services that enable older adults to remain living safely in their homes and communities (Older Americans Act). Age data are also used in programs that provide services and assistance to seniors, such as financial assistance with utilities (Low Income Home Energy Assistance Program).

**Educate Children and Adults**

Knowing how many children and adults depend on services through schools helps school districts make long-term building, staffing, and funding decisions. Age in combination with other information, such as disability status, language spoken at home, and poverty status, assists schools in understanding the needs of their students and qualifying for grants that help fund programs for those students (Elementary and Secondary Education Act of 1965).

**Ensure Equal Opportunity**

Knowing the ages of people in the community in combination with information about housing, employment, and education, helps government and communities enforce laws, regulations, and policies against discrimination based on age. For example, age information is used to analyze the employment status of workers by age (Age Discrimination in Employment Act).
## Selected Statutory Uses of Age Data

<table>
<thead>
<tr>
<th>Agency</th>
<th>Statutory References</th>
</tr>
</thead>
<tbody>
<tr>
<td>U.S. Department of Agriculture</td>
<td>42 USC §§ 1472, 1474, 1485, 1486, 1490, and 1490a 7 CFR 3550.10</td>
</tr>
<tr>
<td>U.S. Department of Education</td>
<td>20 USC §§ 6333, 6334(a)(1), 6335(a), and 6337(b)(1)(A)</td>
</tr>
<tr>
<td>U.S. Department of Education</td>
<td>220 USC §§ 6821, 6824, 7011(5), and 7801(20)</td>
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<tr>
<td>U.S. Department of Health and Human Services, Administration for Community Living</td>
<td>42 USC 300kk</td>
</tr>
<tr>
<td>U.S. Department of Health and Human Services, Center for Medicare and Medicaid Services</td>
<td>Patient Protection and Affordable Care Act, Public Law 111–148, § 10334; 42 USC 300kk</td>
</tr>
<tr>
<td>U.S. Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation</td>
<td>42 USC § 1397ii(b)(2)(A)–(C)</td>
</tr>
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<td>U.S. Department of Housing and Urban Development</td>
<td>12 USC § 1701q; 24 CFR part 891</td>
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<tr>
<td>U.S. Department of Justice, Civil Rights Division</td>
<td>Title VII of the Civil Rights Act of 1964, Public Law 88-352; 42 USC § 2000e-2</td>
</tr>
<tr>
<td>U.S. Department of Labor</td>
<td>29 USC §§ 49f(a)(3)(D), 49g(d), and 49l-2(a)15</td>
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<tr>
<td>U.S. Department of Transportation</td>
<td>Fixing America’s Surface Transportation Act, Public Law 114-94; 49 USC § 5303(c), (e), (h), (i), (j), (k), and (n)</td>
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<tr>
<td>U.S. Department of Veterans Affairs</td>
<td>38 USC § 8104(b)(2)</td>
</tr>
<tr>
<td>U.S. Environmental Protection Agency</td>
<td>Federal Water Pollution Control Act (Clean Water Act), Public Law 92-500, 33 USC § 1254(a)(1)–(2), (b)(2), (b)(6), (b)(7), (n) (1), and (o)(1)</td>
</tr>
<tr>
<td>U.S. Social Security Administration</td>
<td>The Social Security Act, Public Law 74-271, as amended, 42 USC § 401(c)</td>
</tr>
</tbody>
</table>
Gender

Gender asked since 1790.

Gender data are used in planning and funding government programs and in evaluating other government programs and policies to ensure they fairly and equitably serve the needs of males and females. These statistics are also used to enforce laws, regulations, and policies against discrimination in government programs and in society.

**GENDER DATA HELP COMMUNITIES:**

**Ensure Equal Opportunity**

Knowing the gender of people in the community in combination with information about housing, voting, language, employment, and education, helps government and communities enforce laws, regulations, and policies against discrimination on the basis of gender. For example, gender data are used to enforce laws against discrimination based on gender in education programs and activities receiving federal financial assistance (Title IX of the Education Amendments of 1972).

**Understand Changes**

Knowing whether people of different genders have the same opportunities in education, employment, voting, home ownership, and many other areas is of interest to researchers, advocacy groups, and policymakers. For example, the National Science Foundation uses gender data to provide information on women in the science and engineering workforce, and several agencies use gender data to investigate whether women, including women who are military veterans, have similar employment opportunities as men.
### Selected Statutory Uses of Gender Data

| U.S. Department of Health and Human Services, Administration for Children and Families | 42 USC § 8623(a)(2) and (4), § 8629(a)(1)–(3), and (6), § 8629(b) |
| U.S. Department of Health and Human Services, Administration for Community Living | 42 USC 300kk |
| U.S. Department of Health and Human Services, Agency for Healthcare Research and Quality | 42 USC §§ 299a(a)(3),(6),(8), 299b-2(a)(1), and 299(c)(1)(B) |
| U.S. Department of Health and Human Services, Center for Medicare and Medicaid Services | Patient Protection and Affordable Care Act, Public Law 111-148, § 10334; 42 USC 300kk |
| U.S. Department of Health and Human Services, Health Resources and Services Administration, Bureau of Clinician Recruitment and Service | 42 USC § 254e; 42 CFR 5.2 |
| U.S. Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation | 42 USC § 1397ii (b)(2)(A)–(C) |
| U.S. Department of Housing and Urban Development | Fair Housing Act, Public Law 90–284, 42 USC 3600–3620, 42 USC 3608(e) |
| U.S. Department of Justice, Civil Rights Division | Title IX of the Education Amendments of 1972, 20 USC § 1701 et seq. |
| U.S. Department of Transportation | Fixing America’s Surface Transportation Act, Public Law 114-94; 49 USC § 5303(c), (e), (h), (i), (j), (k), and (n) |
| U.S. Department of Veterans Affairs | 38 USC § 546 |
| U.S. Environmental Protection Agency | Federal Water Pollution Control Act (Clean Water Act), Public Law 92-500, 33 USC § 1254(a)(1)–(2), (b)(2), (b)(6), (b)(7), (n)(1), and (o)(1) |
| U.S. Social Security Administration | The Social Security Act, Public Law 74-271, as amended, 42 USC § 401(c) |
Race/Ethnicity

Race asked since 1790, ethnicity asked since 1970.

QUESTIONS ABOUT A PERSON’S RACE OR ETHNICITY ARE USED TO CREATE DATA ABOUT RACE AND ETHNIC GROUPS.

These data are required for federal and state programs and are critical factors in the basic research behind numerous policies, particularly for civil rights. Race and ethnicity data are used in planning and funding government programs that provide funds or services for specific groups. These data are also used to evaluate government programs and policies to ensure they fairly and equitably serve the needs of all racial and ethnic groups and to monitor compliance with antidiscrimination laws, regulations, and policies. States also use these data to meet legislative redistricting requirements.

The U.S. Census Bureau collects race and ethnicity data in accordance with the 1997 Office of Management and Budget standards on race and ethnicity. The categories on race and ethnicity are based on self-identification and generally reflect a social definition of race and ethnicity. The categories are not an attempt to define race and ethnicity biologically, anthropologically, or genetically.

RACE AND ETHNICITY DATA HELP COMMUNITIES:

Ensure Equal Opportunity

Knowing the races and ethnicities of community members in combination with information about housing, voting, language, employment, and education, helps government and communities enforce antidiscrimination laws, regulations, and policies. For example, race and ethnicity data are used in the following ways:

- Establish and evaluate the guidelines for federal affirmative action plans under the Federal Equal Opportunity Recruitment Program.
- Monitor compliance with the Voting Rights Act and enforce bilingual requirements.
- Monitor and enforce equal employment opportunities under the Civil Rights Act of 1964.
- Identify segments of the population who may not be getting needed medical services under the Public Health Service Act.
- Allocate funds to school districts for bilingual services under the Bilingual Education Act.

Understand Changes

Knowing if people of different races and ethnicities have the same opportunities in education, employment, voting, home ownership, and many other areas is of interest to researchers, advocacy groups, and policymakers. The National Science Foundation uses data on race and ethnicity to provide information on people of different racial and ethnic backgrounds in the science and engineering workforce. Several federal agencies use race and ethnicity data to investigate whether housing or transportation improvements have unintended consequences for specific race and ethnic groups. Data on race and ethnicity are used with age and language data to address language and cultural diversity needs in health care plans for the older population.

Administer Programs for Specific Groups

Knowing how many people are eligible to participate in certain programs helps communities, including tribal governments, ensure that programs are operating as intended. For example, the Indian Housing Block Grant program, Indian Community Development Block Grant program, and Indian Health Service all depend on accurate estimates of American Indians and Alaska Natives. Data for the American Indian and Alaska Native population come from the questions about a person’s race or ethnicity.
## Selected Statutory Uses of Race/Ethnicity Data

<table>
<thead>
<tr>
<th>Agency</th>
<th>Statutory Uses</th>
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<tbody>
<tr>
<td>U.S. Department of Commerce, Bureau of the Census</td>
<td>13 USC § 141(c)</td>
</tr>
<tr>
<td>U.S. Department of Commerce, Bureau of the Census</td>
<td>52 USC § 10503</td>
</tr>
<tr>
<td>U.S. Department of Health and Human Services, Administration for Children and Families</td>
<td>Community Services Block Grant Act, Public Law 105-285, 42 USC §§ 9902(2), 9903, and 9908(b)(1)(A), (b)(11), and (c)(1)(A)(l)</td>
</tr>
<tr>
<td>U.S. Department of Health and Human Services, Administration for Community Living</td>
<td>Older Americans Act of 1965, Public Law 89-73, 42 USC § 3018</td>
</tr>
<tr>
<td>U.S. Department of Health and Human Services, Administration for Community Living</td>
<td>42 USC 300kk</td>
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<tr>
<td>U.S. Department of Health and Human Services, Center for Medicare and Medicaid Services</td>
<td>Patient Protection and Affordable Care Act, Public Law 111-148, § 10334; 42 USC § 300kk</td>
</tr>
<tr>
<td>U.S. Department of Housing and Urban Development</td>
<td>Cranston-Gonzalez National Affordable Housing Act, Public Law 101–625, 42 USC 12705(b)(1)–(3); 24 CFR Part 91, 24 CFR 91.205(a)–(c)</td>
</tr>
<tr>
<td>U.S. Department of Housing and Urban Development</td>
<td>Housing and Community Development Act of 1974, 42 USC 5306(a)(1); 24 CFR §1003.101</td>
</tr>
<tr>
<td>U.S. Department of Justice, Civil Rights Division</td>
<td>Title VII of the Civil Rights Act of 1964, 42 USC § 2000e-2</td>
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<tr>
<td>U.S. Environmental Protection Agency</td>
<td>Federal Water Pollution Control Act (Clean Water Act), Public Law 92-500, 33 USC § 1254(a)(1)–(2), (b)(2), (b)(6), (b)(7), (n)(1), and (o)(1)</td>
</tr>
</tbody>
</table>
Relationship

Relationship asked since 1880.

A QUESTION ABOUT THE RELATIONSHIP OF EACH PERSON IN A HOUSEHOLD TO ONE CENTRAL PERSON IS USED TO CREATE ESTIMATES ABOUT FAMILIES, HOUSEHOLDS, AND OTHER GROUPS, AND TO PRESENT OTHER DATA AT A HOUSEHOLD LEVEL.

Relationship data are used in planning and funding government programs that provide funds or services for families, people living or raising children alone, grandparents living with grandchildren, or other households that qualify for additional assistance.

RELATIONSHIP DATA HELP COMMUNITIES:

Provide Adequate Housing

Knowing about the different types of households in a community (single people, couples, families, roommates, etc.) helps communities understand whether available housing meets the needs of residents. Information about the relationships among people in a household, in combination with housing costs and the combined income of all people in a household, helps communities understand whether housing is affordable for residents.

When housing is not sufficient or not affordable, relationship data can help communities enroll eligible households in programs designed to assist them, and can help communities qualify for grants from the Community Development Block Grant, HOME Investment Partnership Program, Emergency Solutions Grant, Housing Opportunities for Persons With AIDS, and other programs.

Provide Assistance to Families

Knowing more about families, such as the ages of children, household income, health insurance status, and poverty status, can help communities enroll eligible families in programs designed to assist them, such as Head Start and the Children's Health Insurance Program, and can help communities qualify for grants to fund these programs. Relationship data are also used to ensure that programs like Temporary Assistance for Needy Families are making a difference for families.

Understand Changing Households

Information about living arrangements and how they are changing, including whether older residents are staying in their homes as they age, whether young people are living with parents or moving in with roommates, and which kinds of households include young children, can help communities plan future programs and services for residents. For example, the Social Security Administration estimates future program needs based on the current relationships of working people.
## Selected Statutory Uses of Relationship Data

<table>
<thead>
<tr>
<th>Department</th>
<th>Statutory Uses</th>
</tr>
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<tbody>
<tr>
<td>U.S. Department of Health and Human Services, Centers for Disease Control and Prevention, National Center for Health Statistics</td>
<td>42 USC § 242k(b), (h), and (l)</td>
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<tr>
<td>U.S. Department of Transportation</td>
<td>Fixing America’s Surface Transportation Act, Public Law 114-94; 49 USC § 5303(c), (e), (h), (i), (j), (k), and (n)</td>
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<tr>
<td>U.S. Department of Education</td>
<td>20 USC §§ 6333, 6334(a)(1), 6335(a), 6337(b)(1)(A)</td>
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<tr>
<td>U.S. Department of Health and Human Services, Administration for Children and Families</td>
<td>42 USC §§ 8629 (a) (1)–(3) and (5)–(6), 8629 (b), and 8622 (11)</td>
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<tr>
<td>U.S. Department of Health and Human Services, Administration for Children and Families</td>
<td>13 USC § 141 note</td>
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<tr>
<td>U.S. Department of Health and Human Services, Administration for Community Living</td>
<td>Developmental Disabilities Assistance and Bill of Rights Act of 2000, Public Law 106-402, § 124(c)(5); 42 USC 15024</td>
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<tr>
<td>U.S. Department of Health and Human Services, Center for Medicare and Medicaid Services</td>
<td>Patient Protection and Affordable Care Act, Public Law 111-148, §10334; 42 USC 300kk</td>
</tr>
<tr>
<td>U.S. Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation</td>
<td>42 USC § 1397ii (b)(2)(A)–(C)</td>
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<tr>
<td>U.S. Department of Housing and Urban Development</td>
<td>Housing and Community Development Act of 1974, as amended, Public Law 93-383, 42 USC 5301, 5302, and 5305; 24 CFR 91.205(a)–(c), 91.305(a)–(c), 570.208(a)(1), 570.483(b)(1), 570.704(a)–(c), 570.707(a)–(c), and 570.901</td>
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<tr>
<td>U.S. Department of Housing and Urban Development</td>
<td>Cranston-Gonzalez National Affordable Housing Act, Public Law 101–625, 42 USC 12705(b)(1)–(3); 24 CFR Part 91; 24 CFR 91.205(a)–(c)</td>
</tr>
<tr>
<td>U.S. Social Security Administration</td>
<td>The Social Security Act, Public Law 74–271, as amended, 42 USC § 401(c)</td>
</tr>
<tr>
<td>U.S. Department of Veterans Affairs</td>
<td>Veterans Benefits Improvement Act of 2008, Public Law 110-389, Title III—Labor and Education Matters, Subtitle C—Vocational Rehabilitation Matters, § 334, 38 USC § 3122</td>
</tr>
</tbody>
</table>
Tenure (Owner/Renter)

Tenure asked since 1890.

Tenure is the most basic characteristic to assess housing inventory. Tenure data are used in government programs that analyze whether adequate housing is affordable for residents. Tenure data are also used to provide and fund housing assistance programs. These statistics are also used to enforce laws, regulations, and policies against discrimination in private-market housing, government programs, and in society.

**TENURE DATA HELP COMMUNITIES:***

**Provide Adequate Housing**

Knowing the different types of households in a community (single people, couples, families, roommates, etc.) and rates of home rental and ownership helps communities understand whether available housing meets the needs of residents. Data about owners and renters, in combination with housing costs and the combined income of all people in a household, help communities understand whether housing is affordable for residents.

When housing is not sufficient or affordable, data about owners and renters can help communities enroll eligible households in programs designed to assist them, and can help communities qualify for grants from the Community Development Block Grant, HOME Investment Partnership Program, Emergency Solutions Grant, Housing Opportunities for Persons With AIDS, and other programs.

**Plan Community Development**

Knowing how the balance of rented homes, mortgaged homes, and homes owned free and clear changes over time can help communities understand changes in local housing markets; identify opportunities to improve tax, assistance, and zoning policies; and to reduce tax revenue losses from vacant or abandoned properties. Tenure is also used in formulas that communities use to determine housing assistance funding (Fair Market Rents).

**Ensure Equal Opportunity**

Knowing the characteristics of people who rent and people who own homes in the community, such as age, gender, race, Hispanic origin, disability, helps government and communities enforce laws, such as the 1968 Fair Housing Act, designed to eliminate discrimination in housing.

**Understand Changing Households**

Knowing whether older residents are staying in homes as they age or moving into rented homes; and whether young people are staying with parents, renting with roommates, or buying homes, can help governments and communities distribute funds appropriately between home ownership and rental housing programs and services for residents.
### Selected Statutory Uses of Tenure Data

| U.S. Department of Agriculture | 42 USC §§ 1472, 1474, 1485, 1486, 1490, 1490a, 1490i, 1490m, 1490p-2, 1490r; 7 CFR 1940.563–564, 1940.575, 3560.11, and 3560.152(a)(2) |
| U.S. Department of Housing and Urban Development | United States Housing Act of 1937, Public Law 93-383, as amended, 42 USC § 1437f(c)(1); 24 CFR 888.113; 24 CFR 982.401 |
| U.S. Department of Housing and Urban Development | Cranston-Gonzalez National Affordable Housing Act, Public Law 101–625, 42 USC 12705(b)(1)–(3); 24 CFR Part 91, 24 CFR 91.205(a)–(c) |
| U.S. Department of Housing and Urban Development | Rehabilitation Act of 1973, § 504, Public Law 93-112, 29 USC 794; 24 CFR § 8.22(b); 24 CFR § 8.23(a) |
| U.S. Department of Housing and Urban Development | 12 USC § 4568 |
| U.S. Department of Housing and Urban Development | 12 USC § 1701q; 24 CFR part 891 |
| U.S. Department of Housing and Urban Development | Tax Reform Act of 1986, Public Law 99-514, 26 USC § 42(d)(5)(B)(ii)(I), (iii)(l), (iv), and(g); 15 U.S.C § 631 |
| U.S. Department of Transportation | 49 USC § 5303; 49 CFR Part 613 |
| U.S. Department of Transportation | Fixing America's Surface Transportation Act, Public Law 114-94; 49 USC § 5303(c), (e), (h), (i), (j), (k), and (n) |
| U.S. Department of Transportation | 49 USC §§ 6302(b)(3)(B), 6302(c), 6304(a), 6309(a) |
Subjects Planned for the American Community Survey
Acreage and Agricultural Sales

Acreage asked since 1960, agricultural sales asked since 1960.

QUESTIONS ABOUT THE ACREAGE ASSOCIATED WITH HOUSES, MOBILE HOMES, AND AGRICULTURAL SALES ARE USED TO CREATE DATA ABOUT AGRICULTURAL PROPERTIES AND TO BETTER UNDERSTAND HOME VALUE STATISTICS.

These data are used in planning government programs designed to benefit the farm population and identifying or excluding agricultural areas for many other programs.

ACREAGE AND AGRICULTURAL SALES DATA HELP COMMUNITIES:

Provide Equitable Housing Assistance

Knowing which homes might qualify for farm subsidies, and which homes qualify for housing subsidies, is important to ensure that funds are fairly allocated. For example, the historical definition of Fair Market Rents, used to allocate housing assistance, has always excluded units on acreage of more than 10 acres to eliminate those units that might benefit from farm subsidies and therefore have lower-than-market rents. Understanding which kinds of properties are eligible for certain programs helps communities inform eligible residents and determine whether the community is eligible for funds based on its farm population.

Support Agricultural Programs

Knowing which areas of a community are agricultural helps communities ensure eligible institutions receive funding for cooperative agricultural extension work and agricultural research. This funding is distributed to eligible institutions based on a legislatively determined formula that uses these data.

Plan Community Development

Knowing the size and agricultural nature of areas of each community can help communities understand changes in local housing markets; identify opportunities to improve tax, assistance, and zoning policies; and reduce tax revenue losses from vacant or abandoned properties.
## Selected Statutory Uses of Acreage and Agricultural Sales Data

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<tr>
<th>Agency</th>
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<tbody>
<tr>
<td>U.S. Environmental Protection Agency</td>
<td>Air Pollution Control Act (Clean Air Act), Public Law 84-159, 42 USC § 7403(a)(1), (b)(6), (b)(7), (e), and (g)</td>
</tr>
<tr>
<td>U.S. Federal Reserve Board</td>
<td>Public Law 95-128, 12 USC § 2901 et seq.; 12 CFR 228.12</td>
</tr>
<tr>
<td>U.S. Federal Reserve Board</td>
<td>Public Law 94-200, 12 USC § 2809(a); 12 CFR 203</td>
</tr>
</tbody>
</table>
Ancestry asked since 1980.

Ancestry data are used in planning and evaluating government programs and policies to ensure they fairly and equitably serve the needs of all groups. These statistics are also used to enforce laws, regulations, and policies against discrimination in society.

**ANCESTRY DATA HELP COMMUNITIES:**

**Ensure Equal Opportunity**

Knowing the ethnic groups in a community in combination with information about housing, voting, language, employment, and education, helps government and communities enforce laws, regulations, and policies against discrimination based on national origin. For example, ancestry data are used to enforce nondiscrimination in education (including monitoring desegregation); to enforce nondiscrimination in employment by federal agencies, private employers, employment agencies, and labor organizations; and to enforce laws, regulations, and policies against discrimination in federal financial assistance (Civil Rights Act of 1964).

**Understand Changes**

Knowing whether people from different backgrounds have the same opportunities in education, employment, voting, home ownership, and many other areas is of interest to researchers, advocacy groups, and policymakers. For example, ancestry data are used with age and language data to address language and cultural diversity needs in health care plans for the older population.
### Selected Statutory Uses of Ancestry Data

<table>
<thead>
<tr>
<th>Agency</th>
<th>Statutory References</th>
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<tbody>
<tr>
<td>U.S. Department of Health and Human Services, Centers for Disease Control and Prevention, National Center for Health Statistics</td>
<td>42 USC § 242k(b), (h), and (l)</td>
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<tr>
<td>U.S. Department of Justice, Civil Rights Division</td>
<td>Civil Rights Act of 1964, 42 USC § 2000c et seq.</td>
</tr>
<tr>
<td>U.S. Environmental Protection Agency</td>
<td>Federal Water Pollution Control Act (Clean Water Act), Public Law 92-500, 33 USC § 1254(a)(1)–(2), (b)(2), (b)(6), (b)(7), (n)(1), and (o)(1)</td>
</tr>
<tr>
<td>U.S. Department of Health and Human Services, Administration for Children and Families</td>
<td>Community Services Block Grant Act, Public Law 105-285, § 673 (2), 674, and 681A, 42 USC § 9902 (2), 9903, and 9908 (b)(1)(A), (b)(11), and (c)(1)(A)(i)</td>
</tr>
<tr>
<td>U.S. Department of Health and Human Services, Indian Health Service</td>
<td>Snyder Act, Nov. 2, 1921, c. 115; 25 USC § 13; Transfer Act, Aug. 5, 1954, c. 658, § 2, 42 USC § 2001(a); 42 C.F.R. § 136.12(a)</td>
</tr>
<tr>
<td>U.S. Department of Health and Human Services, Office for Civil Rights</td>
<td>Title VI of the Civil Rights Act of 1964, 42 USC § 2000d; Patient Protection and Affordable Care Act § 1557, 42 USC § 18116</td>
</tr>
</tbody>
</table>
Commuting (Journey to Work)

Journey to work asked since 1960.

Local agencies and organizations use these statistics to plan transportation programs and services that meet the diverse needs of local populations, including the disabled population, bicycle commuters, carpool and ride-shares, and many other groups. Commuting data are also used to forecast future use of new or updated transportation systems.

**Ensure Equal Opportunity**

Knowing where people could reasonably commute from in order to work in a certain area is used by communities and businesses for employment planning, and by communities and governments to enforce laws, regulations, and policies against employment discrimination.

**Understand Changes in Commutes**

As commuting patterns change, information about where people could reasonably commute from in order to work in a certain area is used to understand commercial markets and labor force participation, and to plan local emergency response programs.

Questions about where people work, how they get there, when they leave, and how long it takes are used to create data about commuting or a person's journey to work.

Journey to work data are used in planning and funding for improvements to road and highway infrastructure, developing transportation plans and services, and understanding where people are traveling in the course of a normal day. These data are also used to evaluate transportation plans to ensure they fairly and equitably serve the needs of all groups.

**Commuting Data Help Communities:**

**Improve Transportation Planning**

Knowing where people commute to and from, and what time of day they are commuting, helps transportation planners create mass transportation and metropolitan transportation plans that are compliant with various transportation, environmental, and antidiscrimination regulations.
### Selected Statutory Uses of Commuting (Journey to Work) Data

<table>
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<tr>
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<tbody>
<tr>
<td>U.S. Department of Health and Human Services, Administration for Children and Families</td>
<td>Community Services Block Grant Act, Public Law 105-285, 42 USC § 9902 (2), 9903, and 9908 (b)(1)(A), (b)(11), and (c) (1)(A)(i)</td>
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<tr>
<td>U.S. Department of Health and Human Services, Center for Medicare and Medicaid Services</td>
<td>2003 Medicare Modernization Act, 42 USC § 1395ww(d)(13)</td>
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<tr>
<td>U.S. Department of Health and Human Services, Health Resources and Services Administration, National Center for Healthcare Workforce Analysis</td>
<td>Public Health Service Act, §§ 761(b)(2)(A), 792(a), 792(b)(2), and 806(f)(1), 42 USC §§ 294n, 295k, and 296e</td>
</tr>
<tr>
<td>U.S. Department of Justice, Civil Rights Division</td>
<td>Title VII of the Civil Rights Act of 1964, 42 USC § 2000e(2) (k); Wards Cove Packing Co. v. Atonio, 490 U.S. 642 (1989)</td>
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<tr>
<td>U.S. Department of the Interior</td>
<td>Public Law 102-477, 25 USC §§ 3401 and 3416; Senate Report 102-188</td>
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<tr>
<td>U.S. Department of Transportation</td>
<td>49 USC § 5303; 49 CFR Part 613</td>
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<td>Fixing America's Surface Transportation Act, Public Law 114-94; 49 USC § 5304; 49 CFR Part 613, Subpart B</td>
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</tr>
</tbody>
</table>
Computer and Internet Use

Computer and Internet use asked since 2013.

These statistics were first released to the public in September 2014. The questions were added as a requirement of the Broadband Data Improvement Act of 2008. They help federal agencies measure the nationwide development of broadband access and decrease barriers to broadband access.

QUESTIONS ABOUT THE COMPUTERS AND DEVICES THAT PEOPLE USE, WHETHER PEOPLE ACCESS THE INTERNET, AND HOW PEOPLE ACCESS THE INTERNET ARE USED TO CREATE DATA ABOUT COMPUTER AND INTERNET USE.

COMPUTER AND INTERNET USE DATA HELP COMMUNITIES:

Ensure Residents Can Communicate

State and local agencies can use these statistics to evaluate access to broadband in their communities. They can measure access to information on the Internet, including access for schools, libraries, rural health care providers, and other public services. Communities ensure their residents are connected to assistance programs, emergency services, and important information. These statistics may also be useful to understand whether to use Internet or more expensive outreach methods for distributing important public health or safety information.

Federal agencies use these data to evaluate the extent of access to, and adoption of broadband, with a focus on underserved areas. State and local agencies might choose to use these statistics to evaluate access to broadband in their communities.
### Selected Statutory Uses of Computer and Internet Use Data

<table>
<thead>
<tr>
<th>U.S. Federal Communications Commission</th>
<th>Broadband Data Improvement Act of 2008, Public Law 110-385, 47 USC § 1303(d)</th>
</tr>
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<tbody>
<tr>
<td>U.S. Department of Commerce, National Telecommunications and Information Administration</td>
<td>Broadband Data Improvement Act of 2008, Public Law 110-385, 47 USC § 1303(d)</td>
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<tr>
<td>U.S. Department of Transportation</td>
<td>Fixing America's Surface Transportation Act, Public Law 114-94; 49 USC § 5304; 49 CFR Part 613, Subpart B</td>
</tr>
</tbody>
</table>
Disability asked since 1830.

QUESTIONS ABOUT A PERSON'S DIFFICULTY WITH SPECIFIC DAILY TASKS ARE USED TO CREATE STATISTICS ABOUT DISABILITY.

Disability data are used in planning and funding government programs that provide funds or services for populations with disabilities. In addition, these data are used in evaluating other government programs and policies to ensure that they fairly and equitably serve the needs of all groups. These statistics are also used to enforce laws, regulations, and policies against discrimination.

DISABILITY DATA HELP COMMUNITIES:

Provide Adequate Housing
Knowing the different types of disabled households in a community helps communities understand whether available housing meets the needs of residents. When housing is not sufficient or not affordable, disability data can help communities enroll eligible households in programs designed to assist them and can help communities qualify for grants from the Community Development Block Grant, HOME Investment Partnership Program, Emergency Solutions Grants, Housing Opportunities for Persons With AIDS, and other programs.

Provide Health Care to Children and Families
Knowing the disability status of people in families in combination with other information, such as household income, health insurance status, and poverty status, can help communities enroll eligible families in programs designed to assist them. For example, disability data are used to target efforts to enroll eligible people in Marketplace, Medicaid, and the Children's Health Insurance Program (CHIP). Disability data are also used to ensure that Marketplace, Medicare, Medicaid, and CHIP programs are adequately serving these families.

Ensure Equal Opportunity
Knowing the disability status of people in the community in combination with information about housing, voting, employment, and education, helps governments and communities enforce laws, regulations, and policies against discrimination based on disability status. For example, disability data are used to evaluate whether there are health care or public health program disparities based on disability status (Developmental Disabilities Assistance and Bill of Rights Act of 2000).

Provide Assistance to People With Disabilities
Knowing how many people in a community over a certain age have a disability helps local officials provide programs and services to older adults that enable them to remain living safely in their homes and communities (Older Americans Act). Disability status data are also used in programs that provide services and assistance to people with a disability, such as financial assistance with utilities (Low Income Home Energy Assistance Program).

Understand Changes
Knowing whether people with disabilities have the same opportunities in education, employment, voting, home ownership, and many other areas is of interest to researchers, advocacy groups, and policymakers. Communities also need to understand changes in the needs and geographic concentrations of people with disabilities to ensure that they can meet the community's needs during weather events, disasters, and public health emergencies.
## Selected Statutory Uses of Disability Data

<table>
<thead>
<tr>
<th>Agency</th>
<th>Statute(s)</th>
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<tbody>
<tr>
<td>U.S. Department of Health and Human Services, Centers for Disease Control and Prevention, National Center for Health Statistics</td>
<td>42 USC § 242k(b), (h), and (l)</td>
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<tr>
<td>U.S. Department of Health and Human Services, Centers for Disease Control and Prevention</td>
<td>Public Health Service Act, § 301, 42 USC 241; Public Health Service Act, § 3101, 42 USC 300kk</td>
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<td>42 USC 300kk</td>
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<tr>
<td>U.S. Department of Health and Human Services, Administration for Community Living</td>
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<td>U.S. Department of Health and Human Services, Center for Medicare and Medicaid Services</td>
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<td>U.S. Department of Health and Human Services, Health Resources and Services Administration</td>
<td>Public Health Service Act § 792(b)(2), 42 USC § 295(k)(b)(2)</td>
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<td>U.S. Department of Housing and Urban Development</td>
<td>Cranston-Gonzalez National Affordable Housing Act, Public Law 101–625, 42 USC 12705(b)(1)–(3); 24 CFR Part 91; 24 CFR 91.205(a)–(c)</td>
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<tr>
<td>U.S. Department of Housing and Urban Development</td>
<td>Rehabilitation Act of 1973, § 504, Public Law 93-112, 29 USC 794; 24 CFR §8.22(b); 24 CFR §8.23(a)</td>
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<tr>
<td>U.S. Department of Veterans Affairs</td>
<td>38 USC § 546</td>
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<tr>
<td>U.S. Department of Veterans Affairs</td>
<td>38 USC § 8104(b)(2)</td>
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</tbody>
</table>
Fertility

Fertility asked since 1890.

A QUESTION ABOUT WHETHER A WOMAN HAD A BABY IN THE LAST YEAR IS USED TO CREATE STATISTICS ABOUT FERTILITY.

Fertility data are used in planning government programs and adjusting other important data, such as the size of the population eligible for different services, as new people are born. These statistics can also be used to project the future size of the population and to understand more about growing families.

FERTILITY DATA HELP COMMUNITIES:

Provide Health Care to Children and Families

Knowing the numbers of women with a recent birth in combination with other information, such as marital status, labor force status, household income, health insurance status, and poverty status, can help communities understand changes in the demand for health care. For example, knowing how many American Indian babies are born can help communities, tribes, and the federal government estimate the demand for health care through the Indian Health Service.

Understand Changing Households

Knowing the characteristics of women who are giving birth, including where in the country they live, is important to understand the relationships among different development patterns, including housing and travel information and public health and pollution.

Though local vital statistics offices typically have a count of births per year, fertility data are able to provide federal program planners, policymakers, and researchers with additional statistics about the age, education, and employment of parents in households welcoming children, and other important information about the homes (age, size, etc.) and households (income, language spoken, etc.) for a more complete picture of families.

State and local agencies can use these statistics in combination with other information about new mothers, such as education and income, to understand future needs for the local education system and health services.
### Selected Statutory Uses of Fertility Data

<table>
<thead>
<tr>
<th>U.S. Environmental Protection Agency</th>
<th>Federal Water Pollution Control Act (Clean Water Act), Public Law 92-500, 33 USC § 1254(a)(1)–(2), (b)(2), (b)(6), (b)(7), (n)(1), and (o)(1)</th>
</tr>
</thead>
</table>
Grandparent Caregivers

Grandparent caregivers asked since 2000.

QUESTIONS ABOUT WHETHER A PERSON IS THE PRIMARY CAREGIVER FOR HIS/HER GRANDCHILDREN AND HOW LONG HE/SHE HAS CARED FOR HIS/HER GRANDCHILDREN, ARE USED TO CREATE STATISTICS ABOUT GRANDPARENT CAREGIVERS.

Grandparent caregiver data help federal agencies understand the special provisions needed for federal programs designed to assist families, as older Americans are often in different financial, housing, and health circumstances than those of other ages. These data are also used to measure the effects of policies and programs that focus on the well-being of families, including tax policies and financial assistance programs.

GRANDPARENT CAREGIVER DATA HELP COMMUNITIES:

Provide Assistance to Families

Knowing more about families, particularly those where grandparents care for grandchildren, along with data about the ages of children, household income, disability, and poverty status can help communities enroll eligible families in programs designed to assist them, such as the Children’s Health Insurance Program, and can help communities qualify for grants to fund these programs. These data are also used to evaluate programs like Temporary Assistance for Needy Families.

Provide Assistance to Older Americans

Knowing how many people in a community are over a certain age, including whether older Americans are caring for grandchildren, helps local officials fund programs and services targeted to reach older adults with the greatest economic and social needs (Older Americans Act).

Understand Changing Households

Knowing more about how often grandparents are responsible for the basic care for grandchildren and how long they have been responsible in combination with information about age, presence of children, income, etc., can help communities understand if available housing and services are meeting residents’ needs.
### Selected Statutory Uses of Grandparent Caregivers Data

<table>
<thead>
<tr>
<th>U.S. Department of Commerce, Bureau of the Census</th>
<th>13 USC § 141 note</th>
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<tbody>
<tr>
<td>U.S. Department of Health and Human Services, Administration for Children and Families</td>
<td>13 USC § 141 note</td>
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</tbody>
</table>
Health Insurance

Health insurance asked since 2008.

**QUESTIONS ABOUT THE SOURCES OF A PERSON'S HEALTH INSURANCE ARE USED TO CREATE STATISTICS ABOUT THE PERCENTAGE OF PEOPLE COVERED BY HEALTH INSURANCE AND THE SOURCES OF HEALTH INSURANCE.**

Health insurance data are used in planning government programs, determining eligibility criteria, and encouraging eligible people to participate in health insurance programs.

**HEALTH INSURANCE DATA HELP COMMUNITIES:**

**Provide Assistance to Children and Families**
Knowing the health insurance coverage status in combination with other information, such as number and age of children in families, household income, and poverty status, can help communities enroll eligible families in programs designed to assist them. For example, health insurance coverage status and age data are used to target efforts to enroll eligible people in Marketplace, Medicaid, and the Children’s Health Insurance Program (CHIP). Health Insurance data are also used to ensure that Marketplace, Medicare, Medicaid, and CHIP programs are improving health outcomes for families.

**Provide Health Care for Veterans**
Knowing the number and characteristics of veterans eligible to use Department of Veterans Affairs health care, compared to those currently using services, can help communities and the federal government estimate the future demand for health care services and facilities for veterans.

**Provide Health Care for American Indians**
Knowing the health insurance coverage of American Indians can help communities, tribes, and the federal government estimate the demand for health care through the Indian Health Service.

**Understand Changes**
Knowing the health insurance coverage status of people in a community helps planners identify gaps in community services, plan programs that address those gaps, and qualify for funding for those programs.

Knowing more about changes in health insurance coverage rates and the characteristics of people who have or do not have health insurance is also of interest to researchers, advocacy groups, and policymakers. For example, State Councils on Developmental Disabilities use health insurance coverage data in their comprehensive reviews and analyses of the unmet needs of people with developmental disabilities.
### Selected Statutory Uses of Health Insurance Data

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<thead>
<tr>
<th>Agency/Department</th>
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<td>U.S. Department of Health and Human Services, Agency for Healthcare Research and Quality</td>
<td>42 USC §§ 299a(a)(3), (6), (8), 299b-2(a)(1), and 299(c)(1)(B)</td>
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<tr>
<td>U.S. Department of Health and Human Services, Centers for Disease Control and Prevention, National Center for Health Statistics</td>
<td>42 USC § 242k(b), (h), and (l)</td>
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<tr>
<td>U.S. Department of Health and Human Services, Center for Medicare and Medicaid Services</td>
<td>Patient Protection and Affordable Care Act, Public Law 111-148, §10334; 42 USC 300kk</td>
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<td>U.S. Department of Health and Human Services, Indian Health Service</td>
<td>Snyder Act, Nov. 2, 1921, c. 115, 25 USC § 13; Transfer Act, Aug. 5, 1954, c. 658, § 2, 42 USC § 2001(a); 42 CFR § 136.12(a)</td>
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<tr>
<td>U.S. Department of Health and Human Services, Office for Civil Rights</td>
<td>Rehabilitation Act of 1973, § 504; Public Law 93-112; Americans With Disabilities Act, Titles II and III, as amended by the ADA Amendments Act of 2008, Public Law 110-325, 42 USC, Chapter 126</td>
</tr>
<tr>
<td>U.S. Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation</td>
<td>42 USC § 1397ii (b)(2)(A)–(C)</td>
</tr>
<tr>
<td>U.S. Department of Veterans Affairs</td>
<td>Public Law 106-117, 38 USC §§ 8134(a)(2)</td>
</tr>
</tbody>
</table>
Home Heating Fuel

Home heating fuel asked since 1940.

These data are used in government programs that analyze community air quality and energy needs. Federal agencies use these statistics to forecast future energy demand, analyze the fuels available to community residents, and plan and fund programs that help low-income residents afford to heat their homes.

HOME HEATING FUEL DATA HELP COMMUNITIES:

Provide Assistance With Utilities
Knowing which fuel is used to heat homes in combination with the cost of those fuels and the characteristics of the low-income households that need assistance with their utilities, helps communities enroll eligible households in assistance programs like the Low Income Home Energy Assistance Program and qualify for grants to fund assistance. These data are also used to evaluate whether these programs benefit eligible households.

Estimate Future Energy Demand
Knowing the current users of certain heating systems and the kinds of systems used in new homes helps communities predict future demand for fuels and the future costs of systems in use in a community. For example, the Department of Energy uses these data to project demand over the next 30 years, assessing the energy needs of the U.S. economy in a domestic and international context.

Measure Environmental Impacts
Communities with older heating systems may have lower air quality at times when they are in high use. Home heating fuel data are used to develop an inventory of the national aggregate emissions of each greenhouse gas and to research and report on the relationships among different development patterns (including housing and travel information) and public health and pollution (Clean Air Act, Clean Water Act).
## Selected Statutory Uses of Home Heating Fuel Data

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<tr>
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<td>42 USC § 8629(a) and (b)</td>
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<tr>
<td>U.S. Department of Health and Human Services, Administration for Children and Families</td>
<td>42 USC § 8623(a)(2) and (4), § 8629(a)(1)–(3) and (6), § 8629(b)</td>
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<td>U.S. Department of Health and Human Services, Administration for Children and Families</td>
<td>42 USC § 8623(a)(2) and (4) and § 8622(11)</td>
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<td>42 USC § 8629(a)(1)–(3) and (6)</td>
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<tr>
<td>U.S. Environmental Protection Agency</td>
<td>Air Pollution Control Act (Clean Air Act), Public Law 84-159, 42 USC § 7403(a)(2), (b)(1), and (b)(6)</td>
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<tr>
<td>U.S. Environmental Protection Agency</td>
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</tr>
<tr>
<td>U.S. Environmental Protection Agency</td>
<td>Federal Water Pollution Control Act (Clean Water Act), Public Law 92-500, 33 USC § 1254 (a)(2), (b)(6), and (s)</td>
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<tr>
<td>U.S. Environmental Protection Agency</td>
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</tbody>
</table>
Home Value and Rent

Home value asked since 1940, rent asked since 1940.

These data are used in government programs that analyze whether adequate housing is affordable for residents and provide and fund housing assistance programs. These statistics are also used to enforce laws, regulations, and policies designed to eliminate discrimination in private-market housing, government programs, and in society.

**HOME VALUE AND RENT DATA HELP COMMUNITIES:**

**Provide Adequate Housing**

Knowing the different types of households in a community (single people, couples, families, roommates, etc.) helps communities understand whether available housing meets the needs of residents. Housing costs in combination with relationship and combined income of all people in a household helps communities understand whether housing is affordable.

When rental housing is not affordable, rent data are used to identify rental distribution of housing units (the standard cost of different types of housing in different areas of the country) and to determine Fair Market Rents, which the Department of Housing and Urban Development uses to determine the amount of tenant subsidies in housing assistance programs.

When housing is not sufficient or not affordable, housing cost data can help communities enroll eligible households in programs designed to assist them and can help communities qualify for grants from the Community Development Block Grant, HOME Investment Partnership Program, Emergency Solutions Grants, Housing Opportunities for Persons With AIDS, and other programs.

**Plan Community Development**

Knowing how the balance of rented homes, mortgaged homes, and owned homes changes over time can help communities understand changes in local housing markets and identify opportunities to improve tax, assistance, and zoning policies.

**Ensure Equal Opportunity**

Knowing more about people who rent and people who own homes in the community in combination with age, gender, race, Hispanic origin, disability, and other data, helps government and communities enforce laws, such as the 1968 Fair Housing Act designed to eliminate discrimination in housing.
## Selected Statutory Uses of Home Value and Rent Data

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<tr>
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<tbody>
<tr>
<td>U.S. Department of Agriculture</td>
<td>42 USC 1485, 1486, 1490a, 1490l, 1490m, 1490p-2, 1490r; 7 CFR 1940.560–1940.567, 1940.575; 7 CFR 3550.10, 3560.11, 3560.152(a)(2), 3560.254(c)</td>
</tr>
<tr>
<td>U.S. Department of Health and Human Services, Administration for Children and Families</td>
<td>Community Services Block Grant Act, Public Law 105-285, 42 USC § 9902 (2), 9903, and 9908 (b)(1)(A), (b)(11), and (c)(1)(A)(i)</td>
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<tr>
<td>U.S. Department of Health and Human Services, Administration for Children and Families</td>
<td>42 USC §§ 9902 (2), 9908(b)(1)(A), and 9914 (a) and (c)</td>
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<td>42 USC §§ 299a(a)(3),(6),(8), 299b-2(a)(1), and 299(c)(1)(B)</td>
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<td>U.S. Department of Health and Human Services, Center for Medicare and Medicaid Services</td>
<td>Social Security Act, Public Law 74-271, § 1848e(1)(A), 42 USC § 1395w-4(e)(1)(A)</td>
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<tr>
<td>U.S. Department of Housing and Urban Development</td>
<td>Cranston-Gonzalez National Affordable Housing Act, Public Law 101–625, 42 USC 12705(b)(1)–(3); 24 CFR Part 91, 24 CFR 91.205(a)–(c)</td>
</tr>
<tr>
<td>U.S. Department of Housing and Urban Development</td>
<td>United States Housing Act of 1937, Public Law 93-383, as amended; 42 USC § 1437f(c)(1); 24 CFR 888.113, 24 CFR 982.401</td>
</tr>
<tr>
<td>U.S. Department of Transportation</td>
<td>49 USC §§ 6302(b)(3)(B), 6303(c), 6304(a), and 6309 (a)</td>
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<tr>
<td>U.S. Department of Transportation</td>
<td>Fixing America's Surface Transportation Act, Public Law 114-94; 49 USC § 5303(c), (e), (h), (i), (j),(k), and (n)</td>
</tr>
<tr>
<td>U.S. Environmental Protection Agency</td>
<td>Federal Water Pollution Control Act (Clean Water Act), Public Law 92-500, 33 USC § 1254(a)(1)-(2), (b)(2), (b)(6), (b)(7), (n)(1), and (0)(1)</td>
</tr>
</tbody>
</table>
Income

Income asked since 1940.

QUESTIONS ABOUT THE FUNDS A PERSON RECEIVES FROM VARIOUS SOURCES ARE USED TO CREATE STATISTICS ABOUT INCOME, ASSISTANCE, EARNINGS, AND POVERTY STATUS.

Income data are used in planning and funding government programs that provide economic assistance for populations in need and measure the economic well-being of the nation. Income and poverty estimates are often part of allocation formulas that determine how food, health care, job training, housing, and other assistance are distributed.

INCOME DATA HELP COMMUNITIES:

Provide Adequate Housing

Knowing the combined income of all people in a household in combination with housing costs helps communities understand whether housing is affordable for residents. When housing is not sufficient or not affordable, income data can help communities enroll eligible households in programs designed to assist them and can help communities qualify for grants from the Community Development Block Grant, HOME Investment Partnership Program, Emergency Solutions Grant, Housing Opportunities for Persons With AIDS, and other programs.

Provide Assistance to Older Americans

Knowing how many older people in a community are living in poverty in combination with other information, such as age and disability status of other family members, can help communities ensure these residents receive appropriate assistance, such as financial assistance with utilities (Low Income Home Energy Assistance Program).

Provide Assistance to Children and Families

Knowing household income in combination with other information, such as the number and age of children in families, health insurance status, and poverty status, can help communities enroll eligible families in programs designed to assist them. For example, income data are used to identify eligibility and provide funding in programs like Medicaid, the Child and Adult Care Food Program, and Head Start.

Educate Children and Adults

Knowing how many children and adults depend on services through schools helps school districts make long-term building, staffing, and funding decisions. Household income and family composition determine poverty status, which is used along with school enrollment, information on disability status, and language spoken at home, to help schools understand the needs of their students and qualify for grants that help fund programs for students with needs for additional services or assistance, including free/reduced price school lunches (Elementary and Secondary Education Act of 1965).

Plan Community Development

Knowing more about the financial situation of residents, including income, employment, and housing costs, can help communities qualify for loan and grant programs designed to stimulate economic recovery, improve housing, run job-training programs, and define areas as empowerment or enterprise zones.
## Selected Statutory Uses of Income Data

<table>
<thead>
<tr>
<th>Agency</th>
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<tbody>
<tr>
<td>U.S. Department of Agriculture</td>
<td>National Agricultural Research, Extension, and Teaching Policy Act, Public Law 95-113, Title XIV; Act of May 8, 1914, ch. 79, 7 USC § 3175; 7 USC § 343(d)</td>
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<tr>
<td>U.S. Department of Agriculture</td>
<td>Richard B. Russell National School Lunch Act, 42 USC § 1759a(g)</td>
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<td>U.S. Department of Agriculture</td>
<td>7 USC § 2020(e)(1); 7 CFR 272.4(b)(6)</td>
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<td>U.S. Department of Education</td>
<td>20 USC § 6333, 6334(a)(1), 6335(a), 6337(b)(1)(A)</td>
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<tr>
<td>U.S. Department of Health and Human Services, Administration for Community Living</td>
<td>42 USC 300kk</td>
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<tr>
<td>U.S. Department of Health and Human Services, Center for Medicare and Medicaid Services</td>
<td>Patient Protection and Affordable Care Act, Public Law 111-148, §10334; 42 USC 300kk</td>
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<tr>
<td>U.S. Department of Health and Human Services, Centers for Disease Control and Prevention</td>
<td>Public Health Service Act, § 301, 42 USC 241; Public Health Service Act, § 3101, 42 USC 300kk</td>
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<tr>
<td>U.S. Department of Housing and Urban Development</td>
<td>Housing and Community Development Act of 1974, 42 USC 5306(a)(1); 24 CFR §1003.101</td>
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<tr>
<td>U.S. Department of Housing and Urban Development</td>
<td>Housing and Community Development Act of 1974 as amended; Public Law 93-383, as amended, 42 USC 5301, 5302, and 5305; 24 CFR 91.205(a)–(c), 91.305(a)–(c), 570.208(a)(1), 570.483(b)(1), 570.704(a)–(c), 570.707(a)–(c), 570.901</td>
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<tr>
<td>U.S. Department of Housing and Urban Development</td>
<td>Tax Reform Act of 1986, Public Law 99-514, 26 USC § 42(d)(5)(B)(ii)(l), (iii)(l), (iv), and(g); 15 U.S.C § 631</td>
</tr>
<tr>
<td>U.S. Department of Housing and Urban Development</td>
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</tbody>
</table>
Industry, Occupation, and Class of Worker

Industry asked since 1820, occupation asked since 1850, class of worker asked since 1910.

These data are used to provide information about the labor force in government programs, to evaluate government programs and policies to ensure they fairly and equitably serve the needs of all groups, and to enforce laws, regulations, and policies against discrimination in society.

INDUSTRY, OCCUPATION, AND CLASS OF WORKER DATA HELP COMMUNITIES:

Provide Employment Opportunities

Knowing whether programs designed to employ specific groups, such as people with disabilities or veterans, are succeeding is important to employers, federal agencies, and federal government contractors (Vietnam Era Veterans’ Readjustment Assistance Act, Rehabilitation Act of 1973). Industry, occupation, and class of worker data provide additional detail about the jobs and careers pursued by people participating in these programs.

State and local agencies use these statistics to identify labor surplus areas (areas with people available for hiring and training), plan workforce development programs including job fairs and training programs, and promote business opportunities.

Ensure Equal Employment Opportunity

Knowing more about people who are employed or looking for work in combination with educational attainment, age, gender, race, Hispanic origin, disability status, veteran status, and other data, helps governments and communities enforce civil rights laws against employment discrimination. For example, these data are used to enforce nondiscrimination in employment by federal agencies, private employers, employment agencies, and labor organizations (Civil Rights Act of 1964).

Understand Changes

Knowing the characteristics of growing or declining industries and occupations is an important part of estimating changes in the economy. Labor force estimates are used in funding decisions; to ensure surveys are accurate, including surveys that provide official labor market estimates; and to understand change in other data (Wagner-Peyser Act and Workforce Investment Act).

Class of worker data, in particular, are used by the National Institute of Food and Agriculture to understand changes in farm workers and agriculture.

QUESTIONS ABOUT A PERSON’S EMPLOYER, THE KIND OF BUSINESS OR INDUSTRY OF THAT EMPLOYER, THE KIND OF WORK A PERSON DOES, AND THAT PERSON’S MOST IMPORTANT ACTIVITIES ARE USED TO PRODUCE INDUSTRY, OCCUPATION, AND CLASS OF WORKER STATISTICS.

1 Industry asked in 1820, 1840, and 1910 until present.
### Selected Statutory Uses of Industry, Occupation, and Class of Worker Data

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<thead>
<tr>
<th>Agency</th>
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<td>U.S. Department of Agriculture</td>
<td>Smith- Lever Act of 1914, 7 USC § 343(c)</td>
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<td>U.S. Department of Agriculture</td>
<td>7 USC 3222b, NIFA Funding Opportunity Announcement (RFA)</td>
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<tr>
<td>U.S. Department of Agriculture</td>
<td>National Agricultural Research, Extension, and Teaching Policy Act, Public Law 95-113, Title XIV, 7 USC § 3222</td>
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<td>U.S. Department of Agriculture</td>
<td>Act of Mar. 2, 1887, ch. 314, 7 USC § 361c</td>
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<tr>
<td>U.S. Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation</td>
<td>42 USC § 1397ii (b)(2)(A)–(C)</td>
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<td>U.S. Department of Transportation</td>
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<td>49 USC §§6303(c) and 6304(a)</td>
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<tr>
<td>U.S. Department of Veterans Affairs</td>
<td>Veterans Benefits Improvement Act of 2008, Public Law 110-389, Title III—Labor and Education Matters, Subtitle C—Vocational Rehabilitation Matters, § 334—Longitudinal study of Department of Veterans Affairs vocational rehabilitation programs, 38 USC § 3122</td>
</tr>
</tbody>
</table>
State and local agencies use these statistics to identify labor surplus areas (areas with people available for hiring and training), plan workforce development programs, including job fairs and training programs, and to promote business opportunities.

**Ensure Equal Opportunity**

Knowing more about people who are employed or looking for work in combination with age, gender, race, Hispanic origin, disability status, veteran status, and other data, helps governments and communities enforce laws, regulations, and policies against discrimination in employment. For example, labor force data are used to enforce nondiscrimination in employment by federal agencies, private employers, employment agencies, and labor organizations (Civil Rights Act of 1964).

**Understand Changes**

Knowing the characteristics of people who are working or looking for work is an important part of estimating changes in the economy. Labor force estimates are used in funding decisions; to ensure surveys are accurate, including surveys that provide official labor market estimates; and to understand change in other data (Wagner-Peyser Act and Workforce Investment Act).
### Selected Statutory Uses of Labor Force Status Data

<table>
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<tr>
<th>Agency</th>
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<tr>
<td>U.S. Department of Health and Human Services, Administration for Community Living</td>
<td>Developmental Disabilities Assistance and Bill of Rights Act of 2000, Public Law 106-402, Section 124(c)(3); 42 USC §15024</td>
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<tr>
<td>U.S. Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation</td>
<td>42 USC § 1397ii (b)(2)(A)–(C)</td>
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<tr>
<td>U.S. Department of Labor</td>
<td>29 USC §§ 49(a)(3)(D), 49g(d), and 49l-2(a)</td>
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<tr>
<td>U.S. Department of Labor</td>
<td>Workforce Investment Act of 1998, Public Law 105-220; 20 CFR 668.296(b) and 668.440</td>
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<td>U.S. Department of Transportation</td>
<td>49 USC § 5303; 49 CFR Part 613</td>
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<tr>
<td>U.S. Department of Transportation</td>
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<td>U.S. Department of Veterans Affairs</td>
<td>38 USC § 546</td>
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U.S. Census Bureau
Language Spoken at Home

Language spoken at home asked since 1890.¹

Language data are used in planning government programs for adults and children who do not speak English well. These data are also used to ensure that information about public health, law, regulations, voting, and safety is communicated in languages that community members understand.

LANGUAGE SPOKEN AT HOME DATA HELP COMMUNITIES:

Educate Children

Knowing how many children and youth with limited English-speaking abilities depend on services through schools helps school districts make long-term staffing and funding decisions. Language spoken at home in combination with other information, such as disability status, school enrollment, and poverty status, helps schools understand the needs of their students and qualify for grants that help fund programs for those students (Elementary and Secondary Education Act of 1965).

Ensure Equal Opportunity

Knowing the languages spoken by people in the community in combination with information about housing, voting, employment, and education, helps the government and communities enforce laws, regulations, and policies against discrimination based on national origin. For example, language data are used to support the enforcement responsibilities under the Voting Rights Act to investigate differences in voter participation rates and to enforce laws and policies related to bilingual requirements.

Knowing languages spoken in a community also helps federal agencies identify needs for services for people with limited English proficiency under Executive Order 13166.

Understand Changes

Knowing whether people who speak languages other than English have the same opportunities in education, employment, voting, home ownership, and many other areas is of interest to researchers, advocacy groups, and policymakers. For example, language data are used with age and ancestry data to address language and cultural diversity needs in health care plans for the older population.

¹ Language spoken at home was not asked in 1950.
<table>
<thead>
<tr>
<th>U.S. Department of Agriculture</th>
<th>7 USC § 2020(e)(1); 7 CFR 272.4(b)(6)</th>
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<tr>
<td>U.S. Department of Commerce, Bureau of the Census</td>
<td>52 USC § 10503</td>
</tr>
<tr>
<td>U.S. Department of Education</td>
<td>20 USC §§ 6821 and 6824, 7011(6), and 7801(25)</td>
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<td>U.S. Department of Health and Human Services, Administration for Children and Families</td>
<td>42 USC § 9835(g)</td>
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<td>U.S. Department of Health and Human Services, Administration for Community Living</td>
<td>42 USC § 300kk</td>
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<tr>
<td>U.S. Department of Health and Human Services, Administration for Community Living</td>
<td>Older Americans Act of 1965, Public Law 89-73, as amended, 42 USC §§ 3013, 3024, 3030s-1, 3032</td>
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<tr>
<td>U.S. Department of Health and Human Services, Center for Medicare and Medicaid Services</td>
<td>Patient Protection and Affordable Care Act, Public Law 111-148, § 10334; 42 USC § 300kk</td>
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</tbody>
</table>
Marital Status and Marital History

Marital status asked since 1880, marital history asked since 1850.

**Marital Status and Marital History Data Help Federal Agencies:**
- Provide Benefits to Spouses and Survivors
  - Questions about whether a person is currently married, widowed, divorced, separated, or never married; whether his/her marital status changed in the past 12 months; and lifetime marriages are used to create statistics about current marital status and marital history.

**Provide Assistance to Families**
Knowing more about families, particularly blended and single-parent families, along with data about the presence of children, labor force status, and poverty status, can help communities enroll eligible families in programs designed to assist them, such as the Children's Health Insurance Program, and can help communities qualify for grants to fund these programs. These data are also used to evaluate programs like Temporary Assistance for Needy Families.

**Understand Changing Households**
Knowing more about community marriage trends (whether people are marrying later in life, not getting married, or marrying again) in combination with information about age, presence of children, income, etc., can help communities understand if the available housing, job training, rental assistance, and administrative services and programs are meeting residents' needs during their major life changes. These data also help the federal government plan for the future. For example, the Social Security Administration estimates future program needs based on the current relationships of working people.

Marital status and marital history data help federal agencies understand marriage trends, forecast future needs of programs that have spousal benefits, and measure the effects of policies and programs that focus on the well-being of families, including tax policies and financial assistance programs.

**Marital Status and Marital History Data Help Communities:**

**Provide Assistance to Families**
- Knowing more about families, particularly blended and single-parent families, along with data about the presence of children, labor force status, and poverty status, can help communities enroll eligible families in programs designed to assist them, such as the Children's Health Insurance Program, and can help communities qualify for grants to fund these programs. These data are also used to evaluate programs like Temporary Assistance for Needy Families.

**Understand Changing Households**
- Knowing more about community marriage trends (whether people are marrying later in life, not getting married, or marrying again) in combination with information about age, presence of children, income, etc., can help communities understand if the available housing, job training, rental assistance, and administrative services and programs are meeting residents' needs during their major life changes. These data also help the federal government plan for the future. For example, the Social Security Administration estimates future program needs based on the current relationships of working people.
## Selected Statutory Uses of Marital Status and Marital History Data

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<tr>
<th>Agency</th>
<th>Statute/Reference</th>
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<tr>
<td>U.S. Department of Health and Human Services, Administration for Children and Families</td>
<td>13 USC § 141 note</td>
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<tr>
<td>U.S. Department of Health and Human Services, Agency for Healthcare Research and Quality</td>
<td>42 USC §§ 299a(a)(3), (6), (8), 299b-2(a)(1), and 299c (1)(A)</td>
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<td>U.S. Department of Health and Human Services, Center for Disease Control and Prevention, National Center for Health Statistics</td>
<td>42 USC § 242k(b), (h), and (l)</td>
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</tr>
<tr>
<td>U.S. Social Security Administration</td>
<td>Social Security Act, Public Law 74–271 as amended, 42 USC § 401(c)</td>
</tr>
</tbody>
</table>
Migration (Previous Residence)/Residence 1 Year Ago

Residence 1 year ago asked since 1930.

QUESTIONS ABOUT WHETHER A PERSON MOVED IN THE LAST YEAR AND WHERE HE OR SHE LIVED 1 YEAR AGO ARE USED TO CREATE STATISTICS ABOUT WHERE PEOPLE ARE MOVING (TO/FROM FOREIGN COUNTRIES AND WITHIN THE UNITED STATES).

Migration (residence 1 year ago) data are used in planning government programs and adjusting other important geographic data as people move. The characteristics of people who have moved are also an important part of estimating population changes. These population estimates are used in funding decisions, to ensure surveys are accurate, to understand change in other data, and to produce official international migration estimates.

MIGRATION/RESIDENCE 1 YEAR AGO DATA HELP COMMUNITIES:

Understand Changes

Knowing the characteristics of people who have moved and the patterns of migration (where people move to and from) is an important part of estimating population changes. Population estimates are used in funding decisions, to ensure surveys are accurate, to understand change in other data, and to produce international migration estimates. These data also help agencies assess residential stability and the effects of migration on urban and rural areas.

Knowing where certain populations move to and from helps federal agencies assess the needs of counties with large refugee populations and the effects of immigration on local areas.

Knowing the characteristics of people who live or have lived in certain areas is important to understand the relationships among different development patterns, including housing and travel information, public health, and pollution. These data may also assist state and local agencies in developing programs that attract new residents or employers.
## Selected Statutory Uses of Migration/Residence 1 Year Ago Data

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<td>U.S. Department of Commerce, Bureau of the Census</td>
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<tr>
<td>U.S. Department of Health and Human Services, Administration for Children</td>
<td>Community Services Block Grant Act, Public Law 105-285, 42 USC §§ 9902 (2),</td>
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<td>and Families</td>
<td>9903, and 9908 (b)(1)(A), (b)(11), and (c)(1) (A)(i),</td>
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<tr>
<td>U.S. Department of Health and Human Services, Indian Health Service</td>
<td>Indian Citizenship Act of 1924, 25 USC § 13; 42 USC § 2001(a); 42 CFR 136.12(a)</td>
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<td>U.S. Environmental Protection Agency</td>
<td>Federal Water Pollution Control Act (Clean Water Act), Public Law 92-500, 33</td>
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<td>USC § 1254(a)(1)–(2), (b)(2), (b)(6), (b)(7), (n)(1), and (o)(1)</td>
</tr>
</tbody>
</table>
Place of Birth, Citizenship, and Year of Entry

Place of birth asked since 1850, citizenship asked since 1820,\(^1\) year of entry asked since 1890.\(^2\)

**QUESTIONS ABOUT A PERSON’S PLACE OF BIRTH, CITIZENSHIP, AND YEAR OF ENTRY INTO THE UNITED STATES ARE USED TO CREATE DATA ABOUT CITIZENS, NONCITIZENS, AND THE FOREIGN-BORN POPULATION.**

These statistics are essential for agencies and policymakers setting and evaluating immigration policies and laws, seeking to understand the experience of different immigrant groups, and enforcing laws, policies, and regulations against discrimination based on national origin. These statistics are also used to tailor services to accommodate cultural differences.

**PLACE OF BIRTH, CITIZENSHIP, AND YEAR OF ENTRY DATA HELP COMMUNITIES:**

**Ensure Equal Opportunity**

Knowing how many people in the community are born in other countries in combination with information about housing, voting, language, employment, and education, helps the government and communities to enforce laws, regulations, and policies against discrimination based on national origin. For example, these data are used to support the enforcement responsibilities under the Voting Rights Act to investigate differences in voter participation rates and to enforce other laws and policies regarding bilingual requirements.

**Educate Children**

Knowing how many foreign-born children depend on services through schools helps school districts make staffing and funding decisions. Place of birth, citizenship, and year of entry statistics in combination with other information, such as language spoken at home, help schools understand the needs of their students and qualify for grants that help fund programs for those students (Elementary and Secondary Education Act of 1965).

**Understand Changes**

Knowing whether people of different races or countries of birth have the same opportunities in education, employment, voting, home ownership, and many other areas is of interest to researchers, advocacy groups, and policymakers. These data may also help communities with large refugee populations that qualify for financial assistance (Immigration Nationality Act).

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\(^1\) Citizenship asked 1820–1830, 1870, and 1890 to present.

\(^2\) Year of entry asked 1890–1930, and 1970 to present.
## Selected Statutory Uses of Place of Birth, Citizenship, and Year of Entry Data

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<thead>
<tr>
<th>Agency</th>
<th>Statutes</th>
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<tbody>
<tr>
<td>U.S. Department of Commerce, Bureau of the Census</td>
<td>52 USC § 10503</td>
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<tr>
<td>U.S. Department of Commerce, Bureau of the Census</td>
<td>13 USC § 141(c)</td>
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<tr>
<td>U.S. Department of Education</td>
<td>20 USC §§ 6821, 6824, 7011(5), and 7801(20)</td>
</tr>
<tr>
<td>U.S. Department of Health and Human Services, Administration for Children and Families</td>
<td>Community Services Block Grant Act, Public Law 105-285, 42 USC §§ 9902 (2), 9903, and 9908(b)(1)(A), (b)(11), and (c)(1)(A)(i)</td>
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<td>42 USC § 242k(b), (h), and (l)</td>
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<tr>
<td>U.S. Department of Health and Human Services, Office for Civil Rights</td>
<td>Civil Rights Act of 1964, Title VI; Patient Protection and Affordable Care Act, Section 1557</td>
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<tr>
<td>U.S. Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation</td>
<td>42 USC § 1397ii (b)(2)(A)(C)</td>
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<tr>
<td>U.S. Department of Housing and Urban Development</td>
<td>Fair Housing Act, Public Law 90–284, 42 USC 3600–3620; 42 USC 3608(e)</td>
</tr>
<tr>
<td>U.S. Department of Justice, Civil Rights Division</td>
<td>Voting Rights Act of 1965, § 203; 52 USC § 10503; 28 CFR Part 55</td>
</tr>
<tr>
<td>U.S. Social Security Administration</td>
<td>Social Security Act, Public Law 74–271, as amended, 42 USC § 401(c)</td>
</tr>
</tbody>
</table>
Plumbing Facilities, Kitchen Facilities, and Telephone Service

Plumbing facilities asked since 1940, kitchen facilities asked since 1940, telephone service asked since 1960.

**QUESTIONS ABOUT THE PRESENCE OF HOT AND COLD RUNNING WATER, A BATHTUB OR SHOWER, A SINK WITH A FAUCET, A STOVE OR RANGE, A REFRIGERATOR, AND TELEPHONE SERVICE ARE USED TO CREATE DATA ABOUT INDICATORS OF HOUSING QUALITY.**

These data are used in planning and funding government programs that identify areas eligible for housing assistance, rehabilitation loans, and other programs that help people access and afford decent, safe, and sanitary housing. Public health officials may also use this information to locate areas in danger of ground-water contamination and waterborne diseases.

**PLUMBING FACILITIES, KITCHEN FACILITIES, AND TELEPHONE SERVICE DATA HELP COMMUNITIES:**

**Provide Adequate Housing**

Knowing more about the quality of housing in a community helps communities understand whether available housing meets the needs of residents. When housing is not sufficient or not affordable, data on household facilities can help communities enroll eligible households in programs designed to assist them, and can help communities qualify for grants from the Community Development Block Grant, HOME Investment Partnership Program, Emergency Solutions Grant, Housing Opportunities for Persons With AIDS, and other programs.

**Plan Community Development**

Knowing how the quality of different types of homes in combination with whether they are occupied or vacant, can help communities identify opportunities to improve tax, assistance, and zoning policies and to reduce tax revenue losses from vacant or abandoned properties. These data may also be useful in identifying types of homes in disaster-prone areas during emergency planning and preparation.

**Ensure Residents Can Communicate**

Measuring the extent of telephone service, including access for schools, libraries, health care providers, and low-income residents, helps communities ensure their residents have universal access to assistance programs, emergency services, and important information.

**Measure Environmental Impacts**

Substandard plumbing systems may impact the local water supply. Understanding where these systems are concentrated helps communities research their wastewater infrastructure needs and work to improve their systems.
<table>
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<tr>
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<tr>
<td>U.S. Department of Agriculture</td>
<td>42 USC §§ 1472, 1474, 1485, 1486, 1490, 1490a, 1490c, 1490d, 1490e, and 1490l; 7 CFR 1940.560–1940.567, 1940.575; 7 CFR 3550.10, 1980.312, 3560.11; 7 CFR 3560.31(a), 3550.67(b), 3500.68(c); 7 CFR 1980.301(d); 7 CFR 3560.102(a), 3560.254(c) RD Instruction 1980-D, Exhibit C</td>
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<tr>
<td>U.S. Department of Housing and Urban Development</td>
<td>Selected Statutory Uses of Plumbing Facilities, Kitchen Facilities, and Telephone Service Data</td>
</tr>
<tr>
<td>U.S. Department of Housing and Urban Development</td>
<td>United States Housing Act of 1937, Public Law 93-383, as amended, 42 USC § 1437f(c)(i); 24 CFR 888.113; 24 CFR 982.401</td>
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<tr>
<td>U.S. Department of Housing and Urban Development</td>
<td>Cranston-Gonzalez National Affordable Housing Act, Public Law 101–625 42 USC 12705(b)(1)–(3); 24 CFR Part 91; 24 CFR 91.205(a)–(c)</td>
</tr>
<tr>
<td>U.S. Department of Housing and Urban Development</td>
<td>Tax Reform Act of 1986, Public Law 99-514, 26 USC § 42(d) (5)(B)(ii)(I), (iii)(I), (iv), and (g); 15 U.S.C § 631</td>
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<tr>
<td>U.S. Department of Housing and Urban Development</td>
<td>Cranston-Gonzalez National Affordable Housing Act, Public Law 101-625, 42 USC § 12705(b)(1)(A) and (B); 24 CFR 92.50(a), (b), and (c)</td>
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<tr>
<td>U.S. Department of Transportation</td>
<td>Fixing America’s Surface Transportation Act, Public Law 114-94; 49 USC § 5304; 49 CFR Part 613, Subpart B</td>
</tr>
</tbody>
</table>
School Enrollment, Educational Attainment, and Undergraduate Field of Degree

School enrollment asked since 1850, educational attainment asked since 1940, undergraduate field of degree asked since 2009.

 questões sobre se uma pessoa está estudando numa escola ou universidade, o nível máximo de educação que ela completou, e a área de estudo de qualquer grau de faculdade de ensino superior completado são usados para criar dados sobre educação.

Estas estatísticas são usadas para analisar as características e as necessidades de crianças e adolescentes, e para entender as necessidades contínuas de educação dos adultos.

**SCHOOL ENROLLMENT, EDUCATIONAL ATTAINMENT, AND UNDERGRADUATE FIELD OF DEGREE DATA HELP COMMUNITIES:**

**Educate Children and Adults**

Knowing how many children and adults depend on services through schools helps school districts make long-term building, staffing, and funding decisions. School enrollment in combination with other information, such as disability status, language spoken at home, and poverty status, helps schools understand the needs of their students and qualify for grants that help fund programs for those students (Elementary and Secondary Education Act of 1965).

Knowing how many adults do not have a high school diploma or equivalent helps schools understand the needs of adult students and qualify for grants that help fund programs for these students (Workforce Investment Act).

Knowing the major fields of study of adults with bachelor’s degrees enables efforts to develop the nation’s science, technology, engineering, and mathematics labor force (America COMPETES Reauthorization Act of 2010).

**Ensure Equal Opportunity**

Understanding more about the characteristics of people enrolled or not enrolled in school helps government and communities enforce laws, regulations, and policies against discrimination in education (Civil Rights Act).

Knowing the educational attainment of workers compared to those seeking employment in combination with age, gender, race, Hispanic origin, disability, and other data, helps enforce nondiscrimination in employment by federal agencies, private employers, employment agencies, and labor organizations (Civil Rights Act of 1964). This information is also used in targeting voting rights enforcement (Voting Rights Act).
<table>
<thead>
<tr>
<th>U.S. Department of Health and Human Services, Administration for Children and Families</th>
<th>42 USC § 9835(g)</th>
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<tr>
<td>U.S. Department of Health and Human Services, Administration for Community Living</td>
<td>Developmental Disabilities Assistance and Bill of Rights Act of 2000, Public Law 106-402, Section 124(c)(5); 42 USC § 15024</td>
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<td>U.S. Department of Health and Human Services, Agency for Healthcare Research and Quality</td>
<td>42 USC § 299a(a)(3),(6),(8); 42 USC § 299b-2(a)(1); 42 USC § 299(c)(1)(A)</td>
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</tr>
</tbody>
</table>
Selected Monthly Owner Costs (Cost of Utilities, Condominium and Mobile Home Fees, Taxes, Insurance, and Mortgages)

Cost of utilities asked since 1940, condominium and mobile homes fees asked since 1990, taxes asked since 1940, insurance cost asked since 1980, mortgages cost asked since 1940.

QUESTIONS ABOUT THE USE AND COST OF COMMON UTILITIES, ANY APPLICABLE CONDOMINIUM AND MOBILE HOME FEES, TAXES, UTILITIES, MORTGAGES, AND HOME LOANS ARE USED TO PRODUCE STATISTICS ABOUT SELECTED MONTHLY OWNER COSTS.

These data are used in government programs that analyze whether adequate housing is affordable for residents and to provide and fund housing assistance programs. These statistics are also used to enforce laws, regulations, and policies against discrimination in government programs and in society.

SELECTED MONTHLY OWNER COSTS DATA HELP COMMUNITIES:

Provide Adequate Housing

Comparing housing costs to household income (the combined income of everyone in the household) helps communities understand whether housing is affordable for residents.

When housing is not sufficient or not affordable, housing cost data can help communities enroll eligible households in programs designed to assist them, and can help communities qualify for grants from the Community Development Block Grant, HOME Investment Partnerships Program, Emergency Solutions Grants, Housing Opportunities for Persons With AIDS, and other programs.

Plan Community Development

Knowing how housing costs change over time can help communities understand changes in local housing markets and to identify opportunities to improve tax, assistance, and zoning policies.

Ensure Equal Opportunity

Knowing more about the housing costs of people who own homes in the community in combination with age, gender, race, Hispanic origin, disability, and other data about the household residents, helps government and communities enforce laws, such as the 1968 Fair Housing Act designed to eliminate discrimination in housing.

1 Cost of utilities asked since 1940, condominium and mobile homes fees asked since 1990, taxes asked in 1940 and since 1980, insurance cost asked since 1980, mortgages cost asked since 1940.
## Selected Statutory Uses of Selected Monthly Owner Costs Data

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<td>U.S. Department of Commerce, Bureau of Economic Analysis</td>
<td>15 USC § 1516; Department Organization Order 35-1A</td>
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<tr>
<td>U.S. Department of Housing and Urban Development</td>
<td>Cranston-Gonzalez National Affordable Housing Act, Public Law 101–625, 42 USC § 12705(b)(1)–(3); 24 CFR Part 91; 24 CFR 91.205(a)–(c)</td>
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<td>U.S. Environmental Protection Agency</td>
<td>Federal Water Pollution Control Act (Clean Water Act), Public Law 92-500, 33 USC § 1254(a)(1)–(2), (b)(2), (b)(6), (b)(7), (n)(1), and (o)(1)</td>
</tr>
</tbody>
</table>
Supplemental Nutrition Assistance Program (SNAP)/Food Stamps

SNAP/food stamps asked since 2005.

SNAP data are used in planning and funding government programs that provide food assistance and in evaluating other government programs.

**SNAP DATA HELP COMMUNITIES:**

**Provide Food Assistance to School Children**

Knowing more about food assistance program participation in combination with school enrollment, income, and poverty status, can help communities streamline administration of the National School Lunch Program and School Breakfast Program by replacing administrative paperwork with American Community Survey estimates of students eligible for free and reduced-price meals.

**Evaluate SNAP**

Knowing more about food-assistance program participation is used to evaluate the SNAP program and award bonuses to communities that administer SNAP funds well.

**Understand Changes**

State and local agencies use these statistics to assess state food assistance needs and participation rates for eligible families and individuals and to determine gaps in services and programs. Faith-based and other nonprofit organizations use information about food assistance needs to determine where food banks, food kitchens, and other programs could be beneficial and how the needs of their communities can be met with additional resources and services.

1 In 2008, the food stamp program was renamed SNAP, but the question uses both program names to minimize confusion.
<table>
<thead>
<tr>
<th>U.S. Department of Agriculture</th>
<th>Richard B. Russell National School Lunch Act, 42 USC § 1759a(g)</th>
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<td>U.S. Department of Health and Human Services, Administration for Children and Families</td>
<td>Community Services Block Grant Act, Public Law 105-285, 42 USC § 9902 (2), 9903, and 9908 (b)(1)(A), (b)(11), and (c)(1)(A) (i)</td>
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<td>U.S. Department of Health and Human Services, Administration for Children and Families</td>
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<td>Federal Water Pollution Control Act (Clean Water Act), Public Law 92-500, 33 USC § 1254(a)(1)–(2), (b)(2), (b)(6), (b)(7), (n) (1), and (o)(1)</td>
</tr>
</tbody>
</table>
Units in Structure, Rooms, and Bedrooms

Units in structure asked since 1940, rooms asked since 1940, bedrooms asked since 1960.

QUESTIONS ABOUT THE TYPE OF BUILDING, UNITS IN THE STRUCTURE, NUMBER OF ROOMS, AND NUMBER OF BEDROOMS ARE USED TO CREATE DATA ABOUT HOUSING TYPES AND HOUSING DENSITY.

These data are used in government programs that analyze whether adequate housing is available and affordable for residents and provide and fund housing assistance programs. The number of rooms in combination with the number of people living in a unit provides a ratio of people to rooms, which can be used to measure the extent of overcrowding among our nation's households. These statistics are also used to enforce laws, policies, and regulations against discrimination in government programs and in society.

UNITS IN STRUCTURE, ROOMS, AND BEDROOMS DATA HELP COMMUNITIES:

Provide Adequate Housing

Knowing the different types of housing, and how many people occupy that housing, helps communities understand whether available housing meets the needs of residents. For example, these data are used to measure overcrowding in communities and are used as integral components to set Fair Market Rents for all areas of the country.

When housing is not sufficient, data can help communities enroll eligible households in programs designed to assist them (such as the Low Income Home Energy Assistance Program), and can help communities qualify for grants from the Community Development Block Grant, HOME Investment Partnerships Program, Emergency Solutions Grants, Housing Opportunities for Persons With AIDS, and other programs.

These data provide benchmark statistics that measure progress toward the Congressional declaration of goals for a national housing policy—a decent home and suitable living environment for every American family.

Plan Community Development

These data are used to identify adequate housing and may be useful in identifying types of structures in disaster-prone areas during emergency planning and preparation.
## Selected Statutory Uses of Units in Structure, Rooms, and Bedrooms Data

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<thead>
<tr>
<th>Department</th>
<th>Statutory Uses</th>
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<tbody>
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<td>U.S. Department of Agriculture</td>
<td>42 USC §§ 1472, 1474, 1485, 1486, 1490, 1490a, 1490c, 1490d, 1490e, 1490f, 1490m, 1490p-2, 1490r; 7 CFR 1940.560–1940.567, 1940.575; 7 CFR 3550.10, 1980.312, 3560.11; 7 CFR 3550.53(a), 3550.67(b), 3550.68(c); 7 CFR 1980.301(d); 7 CFR 3560.152(a)(2), 3560.254(c) RD Instruction 1980-D, Exhibit C</td>
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<td>U.S. Department of Health and Human Services, Administration for Children and Families</td>
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<td>U.S. Department of Health and Human Services, Center for Medicare and Medicaid Services</td>
<td>Social Security Act, Section 1848e(1)(A)</td>
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<td>U.S. Department of Housing and Urban Development</td>
<td>Native American Housing Assistance and Self-Determination Act of 1996, Public Law 104-330, as amended; 25 USC § 4152(b); 24 CFR 1000.324–1000.330 (Also appendices A and B)</td>
</tr>
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<td>U.S. Department of Housing and Urban Development</td>
<td>Housing and Community Development Act of 1974; 42 USC § 5306(a)(1); 24 CFR 1003.101</td>
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<tr>
<td>U.S. Department of Housing and Urban Development</td>
<td>12 U.S.C § 1701q; 24 CFR Part 891</td>
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<tr>
<td>U.S. Department of Housing and Urban Development</td>
<td>Housing and Community Development Act of 1974, Public Law 93-383 as amended, 42 USC §§ 5302(a)(6)(D)(iv), (a)(9), (10), (11), (12), (13), (14), (15), (20), and (b) and 5306(a), (b)(1), (2), and (3) and (d)(1); 24 CFR 1003.101</td>
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<td>U.S. Department of Housing and Urban Development</td>
<td>Cranston-Gonzalez National Affordable Housing Act, Public Law 101–625' 42 USC § 12705(b)(1)-(3); 24 CFR Part 91; 24 CFR 91.205(a)–(c)</td>
</tr>
<tr>
<td>U.S. Environmental Protection Agency</td>
<td>Federal Water Pollution Control Act (Clean Water Act), Public Law 92-500, 33 USC § 1254(a)(1)–(2), (b)(2), (b)(6), (b)(7), (n)(1), and (o)(1)</td>
</tr>
</tbody>
</table>
Vehicles Available

Vehicles available asked since 1960.

Vehicle data are used in planning and funding for improvements to road and highway infrastructure, developing transportation plans and services, and understanding how people are traveling in the course of a normal day. These data are also used to evaluate pollution and access to transportation in emergencies.

VEHICLE AVAILABILITY DATA HELP COMMUNITIES:

Improve Transportation

Knowing how many households have access to vehicles, in combination with where people commute to and from, and whether they commute with a personal vehicle helps transportation planners create mass transportation and metropolitan plans that are compliant with various regulations.

Local agencies and organizations use these data to plan programs and services for the disabled population, bicycle commuters, carpool and ride-sharers, and many other groups; and to predict future use of new or updated transportation systems based on their understanding of the current users of various transportation options.

Understand Changes in Vehicle Use

Understanding vehicle availability and use helps communities understand exposure to air pollution and plan programs to help people without vehicles move about the community. Knowing whether people could evacuate using their personal vehicles in an emergency also helps communities plan emergency response.
## Selected Statutory Uses of Vehicles Available Data

<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>U.S. Department of Transportation</td>
<td>49 USC § 5303; 49 CFR Part 613</td>
</tr>
<tr>
<td>U.S. Department of Transportation</td>
<td>Fixing America’s Surface Transportation Act, Public Law 114-94, 49 USC § 5304; 49 CFR Part 613, Subpart B</td>
</tr>
<tr>
<td>U.S. Department of Transportation</td>
<td>Fixing America’s Surface Transportation Act, Public Law 114-94, 49 USC § 5303(c), (e), (h), (i), (j), (k), and (n)</td>
</tr>
<tr>
<td>U.S. Department of Transportation</td>
<td>49 USC §§ 6302(b)(3)(B), 6303(c), 6304(a), and 6309(a)</td>
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<tr>
<td>U.S. Environmental Protection Agency</td>
<td>Air Pollution Control Act (Clean Air Act), Public Law 84-159, 42 USC § 7403(a)(2), (b)(1), and (b)(6)</td>
</tr>
<tr>
<td>U.S. Environmental Protection Agency</td>
<td>Air Pollution Control Act (Clean Air Act), Public Law 84-159, 42 USC § 7403(a)(1), (b)(6), (b)(7), (e), and (g)</td>
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<tr>
<td>U.S. Environmental Protection Agency</td>
<td>Federal Water Pollution Control Act (Clean Water Act), Public Law 92-500’ 33 USC § 1254 (a)(2), (b)(6), and (s)</td>
</tr>
<tr>
<td>U.S. Environmental Protection Agency</td>
<td>Federal Water Pollution Control Act (Clean Water Act), Public Law 92-500, 33 USC § 1254(a)(1)–(2), (b)(2), (b)(6), (b)(7), (n)(1), and (o)(1)</td>
</tr>
</tbody>
</table>
**Veteran Status, Period of Service, and Department of Veterans Affairs (VA) Service-Connected Disability Rating**

Veteran status asked since 1890, period of military service asked since 1890, VA service-connected disability rating asked since 2008.

### Questions About a Person's Military Service and Service-Connected Disability Rating

Data about veterans are used in planning and funding government programs that provide funds or services for veterans and in evaluating other government programs and policies to ensure they fairly and equitably serve the needs of veterans. These statistics are also used to enforce laws, policies, and regulations against discrimination in society. Though the VA maintains veterans’ records, these statistics do not provide federal program planners, policymakers, and researchers with additional statistics about all veterans, regardless of whether they use VA services.

### Veteran Status, Period of Service, and VA Service-Connected Disability Rating Data Help Communities:

#### Administer Programs for Veterans

Knowing the numbers and characteristics of veterans eligible for federal programs benefiting veterans, such as the VA Home Loan Guarantee program, the Post-9/11 GI Bill, and job training and hiring preference programs can help communities and the federal government estimate the future demand for these programs and services. These data are also used to evaluate these programs to determine whether they are benefiting veterans as intended.

#### Provide Health Care for Veterans

Knowing the number of veterans eligible to use VA health care in combination with age, disability, and service-connected disability ratings, can help communities and the federal government estimate the future demand for health care services and facilities. Communities in need of major VA medical facilities throughout the country make a case for new construction projects using these data to estimate the expected usage of new facilities.

#### Plan End-of-Life Options for Veterans

Knowing where veterans are living toward the end of their lives is important, as the VA estimates the number of nursing home and domiciliary beds needed based on the concentrations of eligible veterans over age 65. These data are also important for the VA National Cemetery Administration, whose goal is to have a VA burial option within 75 miles of a veteran’s residence. These data are used to plan construction of new cemeteries near the communities where veterans choose to live.

#### Ensure Equal Opportunity

Knowing the veteran and service-connected disability rating status of people in the community in combination with information about housing, voting, employment, and education, helps government and communities enforce against discrimination based on veteran or disability status.

#### Understand New Challenges for Veterans

Knowing more about the characteristics of veterans returning to civilian life is also important to combat specific problems they may face. For example, these data are used in research to understand why veteran status is a predictor of homelessness. Such data have been combined with administrative data produced by shelters in an attempt to understand and document which interventions reduce homelessness among veterans.

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1 Veteran status and period of service were not asked in 1920.
### Selected Statutory Uses of Veteran Status, Period of Service, and VA Service-Connected Disability Rating Data

<table>
<thead>
<tr>
<th>Department/Office</th>
<th>Statute/Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>U.S. Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation</td>
<td>42 USC § 1397ii (b)(2)(A)–(C)</td>
</tr>
<tr>
<td>U.S. Department of Veterans Affairs</td>
<td>Veterans Millennium Health Care Benefits Act, Public Law 106-117, Section 101; 38 USC § 1710, 8131(1), and 8134(a)(2)</td>
</tr>
<tr>
<td>U.S. Department of Veterans Affairs</td>
<td>38 USC § 308(b)</td>
</tr>
<tr>
<td>U.S. Department of Veterans Affairs</td>
<td>38 USC § 8104(b)(2)</td>
</tr>
<tr>
<td>U.S. Department of Veterans Affairs</td>
<td>38 USC § 546</td>
</tr>
<tr>
<td>U.S. Department of Veterans Affairs</td>
<td>Veterans Benefits Improvement Act of 2008, Public Law 110-389, Title III—Labor and Education Matters, Subtitle C—Vocational Rehabilitation Matters, Section 334—Longitudinal study of Department of Veterans Affairs vocational rehabilitation programs, 38 USC § 3122</td>
</tr>
<tr>
<td>U.S. Department of Veterans Affairs</td>
<td>Veterans Millennium Health Care and Benefits Act, Public Law 106-117, Section 613(b)(2)</td>
</tr>
</tbody>
</table>
Work Status Last Year

Work status last year asked since 1880.

State and local agencies use these statistics to identify labor surplus areas (areas with people available for hiring and training), plan workforce development programs including job fairs and training programs, and promote business opportunities.

Ensure Equal Opportunity

Knowing more about people who are employed or looking for work, in combination with age, gender, race, Hispanic origin, disability status, veteran status, and other data, helps governments and communities enforce laws, policies, and regulations against discrimination in employment. For example, data on work status last year are used to enforce laws against discrimination in employment by federal agencies, private employers, employment agencies, and labor organizations (Civil Rights Act of 1964).

Understand Changes

Knowing the characteristics of people who are working or looking for work is an important part of estimating changes in the economy. Estimates of work status last year are used in funding decisions; to ensure surveys are accurate, including surveys that provide official labor market estimates; and to understand change in other data (Wagner-Peyser Act and Workforce Investment Act).

Data on work status last year are used in planning and funding government programs that provide unemployment assistance and services, and to understand trends and difference in wages, benefits, work hours, and seasonal work. These data are also used to evaluate other government programs and policies to ensure they fairly and equitably serve the needs of all groups, and to enforce laws, regulations, and policies against discrimination in society.

WORK STATUS LAST YEAR DATA HELP COMMUNITIES:

Provide Employment Opportunities

Knowing whether programs designed to employ specific groups, such as people with disabilities or veterans, are succeeding is important to employers, federal agencies, and federal government contractors (Vietnam Era Veterans' Readjustment Assistance Act, Rehabilitation Act of 1973).
## Selected Statutory Uses of Work Status Last Year Data

<table>
<thead>
<tr>
<th>Organization</th>
<th>Statutory Use</th>
</tr>
</thead>
<tbody>
<tr>
<td>U.S. Department of Health and Human Services, Administration for Children and Families</td>
<td>Community Services Block Grant Act, Public Law 105-285, 42 USC § 9902 (2), 9903, and 9908 (b)(1)(A), (b)(11), and (c)(1)(A)(i)</td>
</tr>
<tr>
<td>U.S. Department of Labor</td>
<td>Workforce Investment Act of 1998, Public Law 105-220; 20 CFR 668.296(b) and 668.440</td>
</tr>
</tbody>
</table>
Year Built and Year Moved In

Year built asked since 1940, year moved in asked since 1960.

QUESTIONS ABOUT WHEN A BUILDING WAS BUILT AND WHEN A PERSON MOVED INTO THAT HOME ARE USED TO CREATE DATA ABOUT HOUSING AGE AND AVAILABILITY.

These data are used in government programs that analyze whether adequate housing is available and affordable for residents, provide and fund housing assistance programs, and measure neighborhood stability.

YEAR BUILT AND YEAR MOVED IN DATA HELP COMMUNITIES:

Provide Adequate Housing

Knowing the ages of housing in a community helps communities understand whether available housing meets the needs of residents.

When housing is not sufficient or older than a certain age, housing data can help communities enroll eligible households in programs designed to assist them (such as the Low Income Home Energy Assistance Program), and can help communities qualify for grants from the Community Development Block Grant, HOME Investment Partnerships Program, Emergency Solutions Grants, Housing Opportunities for Persons With AIDS, and other programs.

Plan Community Development

Knowing how the balance of different ages of homes in combination with whether they are occupied or vacant, can help communities identify opportunities to improve tax, assistance, and zoning policies and to reduce tax revenue losses from vacant or abandoned properties. These data may also be useful in identifying older structures in disaster-prone areas during emergency planning and preparation.

Knowing more about the age of the housing stock in combination with the financial situation of residents, including income, employment, and housing costs, can help communities qualify for loan and grant programs designed to stimulate economic recovery, improve housing, run job-training programs, and define areas as empowerment or enterprise zones.
### Selected Statutory Uses of Year Built and Year Moved In Data

| U.S. Department of Health and Human Services, Administration for Children and Families | 42 USC § 8629(a) and (b) |
| U.S. Department of Health and Human Services, Administration for Children and Families | 42 USC §§ 8623(a)(2) and (4), 8629 (a)(1)–(3) and (6); 42 USC 8629(b) |
| U.S. Department of Housing and Urban Development | Housing and Community Development Act of 1974, Public Law 93-383 as amended, 42 USC § 5302(a)(6)(D)(iv), (a) (9), (10), (11), (12), (13), (14), (15), (20), and (b); 42 USC§ 5306(a), (b)(1), (2), and (3) and (d)(1); 24 CFR 1003.101 |
| U.S. Department of Housing and Urban Development | Cranston-Gonzalez National Affordable Housing Act, Public Law 101–625, 42 USC 12705(b)(1)–(3); 24 CFR Part 91; 24 CFR 91.205(a)–(c) |
| U.S. Department of Housing and Urban Development | Cranston-Gonzalez National Affordable Housing Act, Public Law 101-625, 42 USC § 12747(b)(1)(A) and (B); 24 CFR 92.50(a),(b), and (c) |
| U.S. Environmental Protection Agency | Federal Water Pollution Control Act (Clean Water Act), Public Law 92-500, 33 USC § 1254(a)(1)–(2), (b)(2), (b)(6), (b)(7), (n)(1), and (o)(1) |
Appendix:
Year Current Subjects Planned First Asked in Decennial Census Program
<table>
<thead>
<tr>
<th>Subjects Planned for 2020 Census and/or ACS</th>
<th>Year Subject First Asked in Decennial Census or ACS</th>
<th>Years Not Asked</th>
</tr>
</thead>
<tbody>
<tr>
<td>Acreage</td>
<td>1960</td>
<td></td>
</tr>
<tr>
<td>Age</td>
<td>1790</td>
<td></td>
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<tr>
<td>Agricultural Sales</td>
<td>1960</td>
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<tr>
<td>Ancestry</td>
<td>1980</td>
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</tr>
<tr>
<td>Bedrooms</td>
<td>1960</td>
<td></td>
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<tr>
<td>Citizenship</td>
<td>1820</td>
<td>1840–1860, 1880</td>
</tr>
<tr>
<td>Class of Worker</td>
<td>1910</td>
<td></td>
</tr>
<tr>
<td>Commuting (Journey to Work)</td>
<td>1960</td>
<td></td>
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<tr>
<td>Computer and Internet Use</td>
<td>2013</td>
<td></td>
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<tr>
<td>Condominium and Mobile Home Fees</td>
<td>1990</td>
<td></td>
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<tr>
<td>Cost of Utilities</td>
<td>1940</td>
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<tr>
<td>Disability</td>
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<tr>
<td>Educational Attainment</td>
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<td>Ethnicity</td>
<td>1970</td>
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<tr>
<td>Fertility</td>
<td>1890</td>
<td></td>
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<tr>
<td>Gender</td>
<td>1790</td>
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<td>Grandparent Caregivers</td>
<td>2000</td>
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<td>Health Insurance</td>
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<td></td>
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<tr>
<td>Home Heating Fuel</td>
<td>1940</td>
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<tr>
<td>Home Value</td>
<td>1940</td>
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<tr>
<td>Income</td>
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<tr>
<td>Industry</td>
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<td>1830, 1850–1900</td>
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<tr>
<td>Insurance</td>
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<td>Kitchen Facilities</td>
<td>1940</td>
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<tr>
<td>Labor Force Status</td>
<td>1890</td>
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<td>Language Spoken at Home</td>
<td>1890</td>
<td>1950</td>
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<tr>
<td>Marital History</td>
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<td>Marital Status</td>
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<td>Migration (Previous Residence)/Residence 1 Year Ago</td>
<td>1930</td>
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<td>Mortgages</td>
<td>1940</td>
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<td>Occupation</td>
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<td>Period of Military Service</td>
<td>1890</td>
<td>1920</td>
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<tr>
<td>Place of Birth</td>
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<tr>
<td>Plumbing Facilities</td>
<td>1940</td>
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<tr>
<td>Race</td>
<td>1790</td>
<td></td>
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<tr>
<td>Relationship</td>
<td>1880</td>
<td></td>
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<tr>
<td>Rent</td>
<td>1940</td>
<td></td>
</tr>
<tr>
<td>Rooms</td>
<td>1940</td>
<td></td>
</tr>
<tr>
<td>School Enrollment</td>
<td>1850</td>
<td></td>
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</tbody>
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### Year Current Subjects Planned First Asked in Decennial Census Program—Con.

<table>
<thead>
<tr>
<th>Subjects Planned for 2020 Census and/or ACS</th>
<th>Year Subject First Asked in Decennial Census or ACS</th>
<th>Years Not Asked</th>
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<tbody>
<tr>
<td>Supplemental Nutrition Assistance Program (SNAP)/Food Stamps</td>
<td>2005</td>
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<td>Taxes</td>
<td>1940</td>
<td>1950–70</td>
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<td>Telephone Service</td>
<td>1960</td>
<td></td>
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<tr>
<td>Tenure (Owner/Renter)</td>
<td>1890</td>
<td></td>
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<tr>
<td>Undergraduate Field of Degree</td>
<td>2009</td>
<td></td>
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<tr>
<td>Units in Structure</td>
<td>1940</td>
<td></td>
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<td>VA Service-Connected Disability Rating</td>
<td>2008</td>
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<td>Veteran Status</td>
<td>1890</td>
<td>1920</td>
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<tr>
<td>Work Status Last Year</td>
<td>1880</td>
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<tr>
<td>Year Built</td>
<td>1940</td>
<td></td>
</tr>
<tr>
<td>Year Moved In</td>
<td>1960</td>
<td></td>
</tr>
<tr>
<td>Year of Entry</td>
<td>1890</td>
<td>1940–1960</td>
</tr>
</tbody>
</table>
Honorable James C. Miller III  
Director  
Office of Management and Budget  
Washington, D.C. 20503

Dear Mr. Miller:

This responds to your request for the views of the Department of Justice on H.R. 3639, a bill to prevent distortions in the reapportionment of the House of Representatives caused by the use of census population figures which include aliens, and H.R. 3614, "Relating to decennial censuses of population." In principal part, H.R. 3639 would eliminate illegal aliens from the United States census tabulation when apportioning representatives in Congress among the states. Like H.R. 3639, H.R. 3614 would exclude illegal aliens from the census count. It would include for apportionment purposes, however, members of the armed forces, civilian employees of the Department of Defense, and dependents of such members or employees, living overseas. For the reasons discussed below, we oppose passage of these bills because they raise serious constitutional problems.

Section two of the Fourteenth Amendment to the Constitution provides that:

Representatives shall be apportioned among the several States according to their respective numbers, counting the whole number of persons in each State, excluding Indians not taxed.

U.S. Const., amend. XIV, sec. 2. 1 This constitutional provision

1 Section 2 replaces, in part, the provision in Article I, sec. 2, cl. 3 of the Constitution that provided:

Representatives . . . shall be apportioned among the several States . . . according to their respective Numbers, which shall be determined by adding to the whole Number of free Persons . . . three fifths of all other Persons.

Although we have not found any cases interpreting the breadth of
is implemented by 13 U.S.C. 141(b), Section 2 of N.R. 3639 would add a new paragraph (g) to 13 U.S.C. 141 to require the Secretary of Commerce to make such adjustments in total population figures as may be necessary, using such methods and procedures as the Secretary determines appropriate, in order that aliens in the United States in violation of the immigration laws shall not be counted in tabulating population for purposes of subsection (b) of this section.

The legislative history accompanying section 2 of the Fourteenth Amendment makes clear that Congress intended for all persons, including aliens residing in this country, to be included in the "whole number of persons in each State." 16.

The end of the Civil War and the freeing of the slaves meant an end to apportionment based on the "three fifths" provision of Article I. See note 1. The Reconstruction Congress realized that once readmitted, the former Confederate states would increase their population base by forty percent, adding twelve Representatives to their pre-war total of eighteen. In an effort to undermine this growth in political power before these states were readmitted to the Union, the Thirty-ninth Congress examined various formulas designed to reduce representation whenever states, as expected, discriminated against portions of their male population by excluding them from voting on the basis of race.

For example, there was significant support in the Thirty-ninth Congress for a proposal that representation be based on the number of male voters over the age of twenty-one. See, e.g., Cong. Globe, 39th Cong., 1st Sess. 406 (1866). However, this

1 (Cont.) Article I, the Founding Fathers were aware that the census, and therefore apportionment, would be based on the number of State inhabitants, not of voters. See, e.g., The Federalist Papers (C. Rossiter, ed.), No. 54, at 136.

2 Section 141(b) provides:

The tabulation of total population by States under [the census] as required for the apportionment of Representatives in Congress among the several States shall be completed within 9 months after the census date and reported by the Secretary to the President of the United States.

proposal met serious resistance from many of the Northern states, especially in New England. These states had disproportionately large populations of nonvoters, such as women (large numbers of men had left their homes to pioneer in the West) and Aliens. As Rep. Conkling, one of the original drafters of the Fourteenth Amendment, noted when defending his amendment to count persons rather than citizens, "[m]any of the large States now hold their representation in part by reason of their aliens, and the Legislatures and people of these States are to pass upon the amend-
ment. It must be acceptable to them." Cong. Globe, 39th Cong.,
1st Sess. 389 (1866).

Faced with extensive debate over the amendment's language, the Republicans became concerned that the measure would not pass the Senate. They therefore went into caucus, agreeing to be bound by its decision, and adopted the present language regarding "persons" rather than "citizens." Notwithstanding the protests of opponents who bitterly denounced this language as nothing more than a political compromise designed to ensure passage of the amendment, the Republicans held the majority and the amendment, apportioning representation on the "whole number of persons" in each state, was passed.

Thus, the Congress that passed the Fourteenth Amendment in
1866 not only recognized that aliens would be counted in the census but insisted upon their inclusion as part of a compromise designed to ensure that the amendment would be passed by the industrial states. They did so notwithstanding their acknowledg-
ment that aliens were not bona fide members of the body politic.

6 Zuckerman, AUBRA note 3, at 95. As Sen. Wilson noted:

Now [does this proposal affect] the loyal States? It throws out of the basis at least two and a half millions of unnaturalized foreign-born men and women, and by this we lose at least fifteen Representatives . . . . In 1860 there were in the loyal States 3,866,626 unnaturalized persons of foreign birth, and in the rebel States 233,651. I estimate that Massachusetts would lose one Representative certainly, and probably two, by this change; that New York would lose at least four, Pennsylvania two, Ohio two; and other States would lose in their representa-


7 Zuckerman, AUBRA note 3, at 105.

They rejected arguments that representation should be based on people with permanent ties to the country. They consciously chose to include aliens to advance their dual concerns: ensuring passage of the amendment by the northern states and, denail to the South of any additional representation in Congress.

It is noteworthy that the Supreme Court, in analyzing section 1 of the Fourteenth Amendment, has read the word "person" to include illegal aliens. "Whatever his status under the immigration laws, an alien is surely a 'person' in any ordinary sense of that term. Aliens, even aliens whose presence in this country is unlawful, have long been recognized as 'persons' guaranteed due process of law by the Fifth and Fourteenth Amendments." Plyler v. Doe, 457 U.S. 202, 210 (1982) (citations omitted), review denied 457 U.S. 1151 (1982). It would seem reasonable to assume that those whom the drafters of the Fourteenth Amendment intended to include in the word "persons" in section 1 of the amendment are the same "persons" included by section 2.

We must note that the Reconstruction Congress did not discuss the issue of illegal aliens when it debated the Fourteenth Amendment. It was, however, possible to be an illegal alien in 1866. The United States has had a statute since 1925 governing arrest and exclusion of aliens from hostile countries. Act of July 6, 1925, ch. 326, 31 Stat. 577 (Act), codified at 50 U.S.C. 211. The President is authorized to arrest, secure and remove, with the aid of the courts and the federal marshals, any such aliens he identifies. Moreover, this statutory authority had been exercised prior to 1966. Thus, although the issue was not raised in the debate over the Fourteenth Amendment, certain classes of aliens could be excluded from the United States in 1866 and removed by order of the President if they attempted to return.

8 C. Gordon and H. Rosenfeld, 1 Immigration Law & Procedure, at 1-6 (1965).
10 Moreover, subsequent Congresses have acknowledged, by their efforts to exclude aliens from the census, that the Fourteenth Amendment requires the counting of all aliens. The 71st and 72nd Congresses debated passage of constitutional amendments that would have excluded aliens in the count for apportionment of representatives. See H.R. Rep. 3761, 71st Cong., 3d Sess. (1931); H.R. Rep. 923, 72d Cong., 1st Sess. (1931). The Senate legal counsel had earlier issued an opinion concluding that aliens could not be excluded. 71 Cong., Rec. 2192 (1931). In 1940, a bill to exclude aliens was defeated. See S.Rep., 86 Cong.
The Department of Justice has advised previous Congresses considering identical legislation that aliens must be included within the census for purposes of apportioning congressional Representatives, and has adopted that position in court. We have re-examined this position and continue to believe that it is sound. Accordingly, we find that to the extent that H.R. 3639 and H.R. 3614 would exclude illegal aliens from the census, they are unconstitutional.

We turn now to the question of whether it is constitutional to include in any tabulation of population for purposes of the apportionment any members of the armed forces, civilian employees of the Department of Defense (DOD), or dependents of such members or employees, when any such individuals are assigned to a post outside the United States. While we continue to review the case law and legislative history pertinent to resolution of this question, we note that throughout the debates on section 2 of the Fourteenth Amendment, there seems to be a premise that the census would count inhabitants of the United States, and not individuals who did not reside in one of the states. Accordingly, we entertain serious doubts as to the constitutionality of any legislation that would seek to include for apportionment purposes military personnel, DOD civilian employees, or their dependents, when such individuals live outside the United States. We therefore must oppose passage of this provision in H.R. 3614 at this time.

10 (Cont.) Rec. 4372 (1960) (statement of Rep. Celler) ("If you want aliens out, you must amend the Constitution").
12 See Memorandum of Points and Authorities in Support of Defendant's Motion to Dismiss the Action or, in the Alternative, for Summary Judgement and in Opposition to Plaintiff's Application for a Preliminary Injunction, filed in Federation for American Immigration Reform v. Kluczynsk, 486 F. Supp. 584, 576-77 (D.D.C.) (3-judge court) (FAIR); appeal dismissed, 447 U.S. 916 (1980). The Memorandum is reprinted in the Hearings, supra note 11, at 125. The FAIR court endorsed the government's position in dictum. See 486 F. Supp. at 576-77 (reading section 2 to include all aliens) (dictum).
13 The Department of Commerce advises that the Census Bureau has never counted for apportionment purposes U.S. Ambassadors, military personnel or State Department personnel stationed abroad. The Bureau's practice is based upon the concept of usual residence, which historically has been defined as where a person
The Office of Management and Budget has advised this Department that there is no objection to the submission of this report from the standpoint of the Administration's program.

Sincerely,

[Signature]

Thomas M. Boyd
Acting Assistant Attorney General
Honorable Jeff Bingaman
Chairman
Subcommittee on Government
    Information and Regulation
United States Senate
Washington, D.C. 20510

Dear Senator Bingaman:

You have requested the views of the Department of Justice concerning the constitutionality of proposed legislation excluding illegal or deportable aliens from the decennial census count. In the past, the Department of Justice has taken the position that section two of the Fourteenth Amendment which provides for "counting the whole number of persons in each State" and the original Apportionment and Census Clauses of Article I section two of the Constitution require that inhabitants of States who are illegal aliens be included in the census count. In our review of this issue to date, we have found no basis for reversing this position.

The Office of Management and Budget has advised this Department that it has no objection to the submission of this report to Congress.

Sincerely,

Carol T. Crawford
Assistant Attorney General
U. S. Department of Justice

Justice Management Division

Office of General Counsel

Washington, D.C. 20530

JUN 25 2014

Mr. Kelly R. Welsh
General Counsel
U.S. Department of Commerce
Office of the General Counsel
1401 Constitution Ave., NW
Washington, DC 20230

Re: Legal Authority for American Community Survey Questions

Dear Mr. Welsh:

I have been asked to respond to your letter of May 9, 2014, to Attorney General Holder, in which you requested a review of the questions asked in the American Community Survey (ACS) on behalf of the Department of Justice (DOJ), as well as an affirmation that the questions remain relevant and the legal authorities supporting DOJ’s use of the information are accurate and complete. I apologize for the delay in providing this response, which was due to the decentralization of DOJ’s relevant programs. We sincerely appreciate your office’s flexibility with respect to the timing of this response.

In undertaking this review, working through DOJ’s point of contact for this ACS review, Mr. William Sabol, we asked DOJ component organizations to identify whether they rely on ACS information, and to provide the requested assurances. Ultimately, only two DOJ components indicated that they use ACS information: the Civil Rights Division (CRT) and the Office of Justice Programs (OJP). Within OJP, only the Bureau of Justice Statistics (BJS) uses ACS information. Both CRT and OJP/BJS have described their current needs for relevant ACS information and have provided assurances that the authorities for such uses remain current. I have attached a document describing CRT’s numerous uses of ACS information and the relevant current statutory authorities.

With respect to OJP/BJS, that organization has advised me that it is authorized under 42 U.S.C. § 3732 to collect a wide range of data relating to crime and the criminal justice system, and is specifically directed to collect victimization statistics regarding individuals with developmental disabilities under the Crime Victims with Disabilities Awareness Act of 1998, Pub. L. 105-301, Oct. 27 1998; 112 Stat. 2838 as amended; see 42 U.S.C. § 3732 (Note). Further, while there is no specific statute directly referencing use of the ACS, BJS is authorized under 42 U.S.C. § 3732(d) to enter agreements with any federal agency for assistance in data collection and analysis necessary to perform its multi-faceted mission.
Accordingly, please accept this letter as DOJ’s affirmation that it continues to need relevant information as described above and in the attachment, and that the legal authorities for the use of such information are accurate, current and complete. Mr. Sabol has transmitted the information about the legal authorities to the ACS Content Review staff at Census.

Please let me know if you have any questions about this letter. I can be reached at (202) 514-3452, or at Arthur.Gary@usdoj.gov.

Sincerely yours,

Arthur E. Gary
General Counsel

Attachment

Cc: Jocelyn Samuels, CRT
    Lee Lofthus, JMD
    Karol Mason, OJP
    Ben Mizer, OAG
    William Sabol, BJS
<table>
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<tr>
<th>Statutory Requirement</th>
<th>Title</th>
<th>Citations</th>
<th>Classification</th>
<th>Uses</th>
<th>Lowest geography</th>
<th>ACS Characteristics</th>
<th>Frequency</th>
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<td>Statutory Requirement</td>
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<tr>
<td>Title VI of Civil Rights Act of 1964 (Nondiscrimination in federally assisted programs and activities)</td>
<td>R</td>
<td>Used by the Department of Justice, other federal agencies that offer federal financial assistance, and recipients of federal financial assistance to comply with and enforce the prohibition against discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance.</td>
<td>Census block group</td>
<td>RACE, ANC, LAN, INC, AGE, HIS</td>
<td>Annual</td>
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<tr>
<td>Executive Order 13166: Improving Access to Services for Persons with Limited English Proficiency</td>
<td>R</td>
<td>Used by federal agencies and recipients of federal financial assistance to provide, identify any need for services to those with limited English proficiency (LEP) in order to comply with the prohibition against national origin discrimination programs and activities receiving federal financial assistance and federally-conducted programs and activities.</td>
<td>Census block group</td>
<td>ANC, LAN, INC, AGE, HIS</td>
<td>Annual</td>
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<tr>
<td>Fair Housing Act of 1968</td>
<td>P</td>
<td>Used in enforcement efforts to eliminate and remedy unlawful discrimination in housing.</td>
<td>Census block group</td>
<td>SEX, HISP, RACE, ANC, DIS, INC, HHREL, STRUC, YRBUILT, TEN, VAL, RENT</td>
<td>Annual</td>
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<tr>
<td>Equal Credit Opportunity Act</td>
<td>P</td>
<td>Used in enforcement efforts to eliminate and remedy unlawful discrimination in lending.</td>
<td>Census block group</td>
<td>SEX, AGE, HISP, RACE, VAL, ANC, MS, INC, TEN</td>
<td>Annual</td>
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# DEPARTMENT OF JUSTICE, CIVIL RIGHT DIVISION
## REQUIREMENTS FOR AMERICAN COMMUNITY SURVEY DATA

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<th>Statutory Requirement</th>
<th>Title</th>
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<th>ACS Characteristics</th>
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<tr>
<td>Americans with Disabilities Act of 1990 (ADA)</td>
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<td></td>
<td>Titles II and III; 42 U.S.C. 12131-12189; 28 C.F.R. Parts 35 and 36</td>
<td>P</td>
<td>Used to assist generally with ADA enforcement responsibilities (including evaluating the impact of discriminatory policies and practices on affected populations of persons with disabilities) and to evaluate the impact of proposed regulatory changes to implement the requirements of titles II and III of the ADA.</td>
<td>Census tract</td>
<td>AGE, SEX, RACE, HISP, ATT, DIS, COW, LF, POW, JTW, OCC, IND, INC, WSLY.</td>
<td>Annual</td>
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<tr>
<td>Civil Rights Act of 1964 (Rights to Public Education and Equal Educational Entitlement)</td>
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<td></td>
<td>42 U.S.C. 2000c et seq.</td>
<td>R</td>
<td>Used in the enforcement of nondiscrimination in education by state and local governments, including monitoring desegregation</td>
<td>Place</td>
<td>AGE, SEX, RACE, ANC, HISP, ATT ENR,</td>
<td>Annual</td>
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<td>Title IX of the Education Amendments of 1972</td>
<td>20 U.S.C. 1701 et seq.</td>
<td>R</td>
<td>Used to enforce the prohibition against discrimination on the basis of sex in education programs and activities receiving federal financial assistance</td>
<td>Census block group</td>
<td>SEX</td>
<td>Annual</td>
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## DEPARTMENT OF JUSTICE, CIVIL RIGHT DIVISION

**Requirements for American Community Survey Data**

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<th>Lowest geography</th>
<th>ACS Characteristics</th>
<th>Frequency</th>
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<tbody>
<tr>
<td>Title VII of the Civil Rights Act of 1964</td>
<td>42 U.S.C. 2000e et seq.</td>
<td>R</td>
<td>Used to determine compliance with consent decrees entered by federal courts in pattern or practice employment discrimination lawsuits</td>
<td>Place</td>
<td>SEX, AGE, HISP, RACE, CIT, ATT, VET, LF, POW, JTW, IND, OCC</td>
<td>Annual</td>
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<tr>
<td>Title VII of the Civil Rights Act of 1964</td>
<td>42 U.S.C. 2000e et seq.</td>
<td>R</td>
<td>Used to determine whether group is underrepresented in employer's workforce</td>
<td>Place</td>
<td>SEX, AGE, HISP, RACE, CIT, ATT, VET, LF, POW, JTW, IND, OCC</td>
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<td>Section 707 of Title VII of the Civil Rights Act of 1964</td>
<td>42 U.S.C. 2000e-6</td>
<td>P</td>
<td>Used to plan enforcement of prohibition against pattern or practice employment discrimination</td>
<td>Place</td>
<td>SEX, AGE, HISP, RACE, CIT, ATT, VET, LF, POW, JTW, IND, OCC</td>
<td>Annual</td>
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<tr>
<td>Title VII of the Civil Rights Act of 1964</td>
<td>42 U.S.C. 2000e-5(g)(1)</td>
<td>P</td>
<td>Used to calculate classwide wages lost due to pattern or practice of employment discrimination</td>
<td>Place</td>
<td>SEX, AGE, HISP, RACE, ATT, LF, YRLW, WSLY, IND, OCC, INC</td>
<td>Annual</td>
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How Well Does the American Community Survey Count Naturalized Citizens?

Jennifer Van Hook and James D. Bachmeier
Population Research Institute, The Pennsylvania State University
Temple University

Abstract

Background—Citizenship status among the foreign born is a crucial indicator of social and political incorporation, yet there are good reasons to suspect that citizenship status is inaccurately reported on U.S. surveys.

Objective—This paper updates research carried out in the mid-1990s by Passel and Clark (1997) on the extent to which foreign-born non-citizen respondents in U.S. government-sponsored surveys misreport as naturalized citizens.

Methods—We compare demographic estimates of the resident naturalized foreign-born population in 2010, based on administrative data, to estimates from the 2010 American Community Survey (ACS).

Results—Similar to previous research, we find that misreporting in the ACS is especially high among immigrants from all countries/regions who report fewer than five years in the U.S. We also find that among longer-term foreign-born residents, misreporting is concentrated only among those originating in Mexico, especially men, a finding that diverges from Passel and Clark in that we find no evidence of over-reporting among immigrants from Central America and the Caribbean. Finally, the estimated magnitude of misreporting, especially among longer-term Mexican-born men, is sensitive to assumptions about the rate of emigration in our administrative-based demographic estimates, and assumptions about coverage error in the ACS, though altering these assumptions does not change the conclusions drawn from the general patterns of the results.

Conclusions—For applications that use citizenship as an indicator of legal status, we recommend that self-reported data on citizenship be accepted at face value for all groups except those with less than five years of U.S. residence and Mexican men.

Introduction

Immigration and immigrant integration continue to be topics of enormous social significance, particularly for countries like the United States where immigrants make up 13% of its population. In the context of anti-immigrant policies and attitudes that treat societal outsiders differently, citizenship status among the foreign born is a crucial indicator of social and political incorporation in the United States (Van Hook, Brown, and Bean 2006) and other immigrant-receiving societies (Bloemraad 2006), and is strongly associated with political participation, access to public assistance, health care, and jobs (Passel, Clark and Fix 1997; DeSipio 2001; Fix and Zimmermann 2001; Van Hook and Balarisier 2006).

Citizenship is also a key variable for the production of estimates of the characteristics of the unauthorized foreign-born population (Passel, Van Hook, and Bean 2006). Social scientists and policy analysts therefore rely heavily on survey items on citizenship to answer questions
about immigrants, their well-being, and their impact on host societies (Bloemraad, Korteweg and Yardakul 2008).

Given the importance of citizenship for research on immigrants, it is important to assess the accuracy of citizenship reporting in surveys. In the United States, data on naturalization and citizenship largely come from Census Bureau surveys, such as the Current Population Survey (CPS), the long form of the decennial Census (2000 and earlier), and the American Community Survey (ACS). Prior research, carried out in the mid-1990s by Passel and Clark (1997), suggests that the number of naturalized citizens is over-estimated in Census data, possibly because some non-citizens misreport as citizens. We update and extend this work by comparing demographic estimates of the resident naturalized foreign-born population in 2010, based on administrative data, to estimates from the 2010 American Community Survey (ACS).

Prior Research and Study Contributions

In the United States, immigrants may naturalize after five years of legal permanent residency if they meet the criteria for citizenship (e.g., they must demonstrate English proficiency and pass a civics test), or after three years if they are married to a U.S. citizen or have served in the U.S. military (U.S. Citizenship and Naturalization Services 2012). Because citizenship grants immigrants eligibility for a wide variety of public assistance programs and civic activities (Passel, Clark and Fix 1997; DeSipio 2001; Fix and Zimmermann 2001), and because it serves as an indicator of social inclusion and integration (Van Hook, Brown, and Bean 2006; Bloemraad 2006), researchers interested in immigrant integration and the well-being of immigrants and their children often incorporate citizenship into their analyses. For example, using Canadian and U.S. Census data Bloemraad (2006) finds that rates of naturalization among immigrants in Canada, which has a multicultural policy regime, are relatively higher than those for immigrants in the United States, where federal policy with respect to the civic incorporation of immigrants is, by comparison, more laissez-faire. In another example, Van Hook and Balistreri (2006) found that children living in households with noncitizens experienced steeper declines in food support and increases in food insecurity following the enactment of legislation that cut public assistance programs to noncitizens.

Data on citizenship has also been used in research on the characteristics of the unauthorized immigration. Few surveys ask questions about immigrants’ legal status. Information on citizenship, which is a common survey question, along with other indicators of legal status, has been used to impute who among the foreign born are legally resident (Passel and Cohn 2009). Citizenship is strongly associated with legal status because naturalized citizens are composed entirely of legally-resident persons, while noncitizens are composed of a mixture of legal statuses, including unauthorized migrants, legal permanent residents, and other legal non-immigrants (Passel, Van Hook, and Bean 2006).

There are good reasons to suspect that citizenship is inaccurately estimated in Census data. During the late 1990s, Passel and Clark (1997) compared the number of persons that are reported as naturalized in the 1990 Census and the 1996 Current Population Survey (CPS) with the number of naturalized citizens based on administrative data from the Immigration and Naturalization Service (INS). They found the Census/CPS estimates to be much higher than the INS-based estimates for two groups. Among new arrivals (those in the U.S. fewer than five years) from all national origins, about 75% of those who were reported as naturalized were probably not. Among longer-resident Mexican and Central American immigrants, about one-third of those who were reported as naturalized were probably not.
Although other possible explanations exist, the discrepancy between administrative records and the Census/CPS has been attributed to false reporting of citizenship among Mexican and Central American immigrants, possibly because many of them are unauthorized and have an incentive to hide their status from interviewers or Census takers, or because they are confused about their citizenship status. This assessment has limited the value of the citizenship variable for research on immigrant naturalization and legal status. For example, skepticism about the accuracy of citizenship reporting has led the Pew Hispanic Center to refrain from using citizenship as an indicator of legal status among most recently-arrived immigrants and all Mexicans and Central Americans (Passel et al. 2006).

For several reasons, we seek to update and extend the research conducted by Passel and Clark (1997). First, Passel and Clark's research was presented at a conference but the details of their methodology were never published in a peer-reviewed outlet. For this reason, it has been difficult to evaluate and replicate their work. Here, we provide a detailed description of the data and methods used to evaluate Census-based estimates of the number of naturalized citizens. While our method is not identical to Passel and Clark's method, it adheres to the same basic logic. Like Passel and Clark, we use administrative data on naturalization to evaluate the number of citizens enumerated in Census data, working under the premise that administrative records of naturalization are less sensitive to error than Census data.

Second, we seek to update the Passel and Clark estimates because no evaluations of citizenship reporting have been done since their study. Reporting error may have increased due to increased DHS enforcement activities both at the U.S.-Mexico border and in the U.S. interior (Haddad 2010). The increased risk of deportation and heightened costs of re-entering the United States if deported may have made migrants less willing to provide accurate responses to questions about citizenship. Thus, at the same time that Federal and state/local policy vis-à-vis immigrants has shifted toward the increasing exclusion of non-citizens (Portes and Rumbaut 2006) – and especially unauthorized migrants – from certain rights, benefits and access to labor markets, the changing policy context may have also encouraged increased misreporting of naturalization among non-citizen immigrants, especially in government-sponsored surveys. Passel and Clark examined citizenship in the 1996 March Current Population Survey and the 1990 Census, data collected over 15 years ago. We evaluate the number of naturalized citizens in the 2010 American Community Survey (ACS). Discussed further below, the ACS was designed as a replacement of the decennial Census long form, and now serves as the major source of information about the size and composition of the foreign born population in the United States.

Third, we go beyond the Passel and Clark estimates by exploring the sensitivity of the results to three sources of uncertainty in the calculations: sampling error, emigration of naturalized citizens, and coverage error of naturalized citizens in Census data. We explain how these factors influence estimates of the number of citizens and identify plausible ranges of emigration and coverage error based on past research. We then use these ranges to produce a range of estimates of the discrepancy between administrative and census estimates of the number of citizens. These ranges help us eliminate some of the most important alternative explanations for discrepancies between administrative and census-based estimates. If a discrepancy is consistently evident across all plausible ranges of sampling error, emigration, and coverage error, this lends support to idea that the discrepancy is due to an actual difference between the number of naturalized citizens represented in Census data and the number of naturalized citizens in the population, rather than the assumptions we make in the process of evaluating census data.

Finally, we stress that our aim is to evaluate the ACS citizenship data as it is produced for public use by the Census Bureau. Therefore, we do not attempt to "correct" the citizenship...
status or place of birth data reported in the public-use files of the ACS, such as by recoding what appear to be implausible responses to the citizenship question (e.g., foreign born with fewer than five years of U.S. residence), by adjusting the survey weights to account for insider knowledge of coverage error or other problems with the sampling weights, or by using restricted-use census data. We instead treat the ACS data as a competent non-Census Bureau analyst would.

**Data and Methodology**

To assess the current level of citizenship reporting error, we estimated the number of naturalized citizens in mid-year 2010 by age group, sex, region of origin, and duration of residence based on the number of Office of Immigration Statistics (OIS) naturalization records. We then compared the OIS-based estimates with the corresponding numbers in the 2010 American Community Survey (ACS) (also a mid-year estimate). The difference between the two provides an indication of over- or under-representation of naturalized citizenship in the ACS.

As mentioned above, the discrepancy can arise from errors other than reporting error. Most importantly, the ACS estimates are also subject to sampling error and coverage error, and the OIS-based estimates may not be accurate because of erroneous assumptions about the extent to which immigrants remain in the United States after naturalizing. We provide ranges of estimates based on plausible ranges of sampling error and coverage error (in the ACS), and emigration among naturalized citizens (for the OIS-based estimates). We are therefore able to assess not only the ACS-OIS difference, but also whether the difference could possibly be explained by sampling error or alternative assumptions about emigration or coverage error.

In what follows, we describe the data, samples, methods, and errors associated with the production of the ACS- and OIS-based estimates. This is then followed by a description of how we compare the two sets of estimates. We conducted all data analyses in Stata 12.1. All Stata programs and data files used to produce the ACS and OIS estimates are provided at [link here].

**Estimates Based on the American Community Survey**

**Data**—The 2010 ACS interviewed approximately 1.9 million U.S. housing units, or 2.4 percent of all occupied U.S. housing units, and 145 thousand persons in group quarters. We used the one-year public use 2010 ACS, which contains a 1-in-100 sample of the U.S. population (N = 3,061,692 persons), obtained from the Integrated Public-Use Microdata Series (IPUMS) (Ruggles et al. 2010). We used the ACS, rather than the decennial Census or the Current Population Survey (as done by Passel and Clark), for several reasons. First, the decennial census no longer asks questions about citizenship. By design, the ACS replaced the decennial long form in the early 2000s and is now the only large U.S. sample with questions about naturalization and citizenship. The CPS would have been a good alternative, but the ACS is better because it includes a question about the year of naturalization, an item that is important for our estimates. Additionally, the ACS has a much larger sample than the CPS, which reduces sampling error. Finally, the ACS is representative of the U.S. resident population while the CPS is representative of a sub-set—the civilian noninstitutionalized population. While we do not expect this to make much

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1 Stata is a general software package for data analysis and statistics (see http://www.stata.com/).
2 http://www.census.gov/acs/www/methodology/sample_size_data/
3 Data were extracted from https://usa.ipums.org/usa/sda/.
difference, the more inclusive ACS population is a closer match to the OIS-based estimates, which capture the entire U.S. resident population of naturalized citizens.

As described in the next section, the OIS estimates are limited to those who arrived in the United States in 1990 or later and naturalized age 18 or older. To match the universe for the OIS estimates, the ACS sample is limited to the same population: foreign-born naturalized citizens who came to the U.S. to stay in 1990 or later and who naturalized age 18 or older (N = 47,842).

The key variables used to produce the ACS estimates include country or region of birth (categorized as Mexico, Central American/Caribbean, Asia, and all other regions), sex, age (18-29, 30-39, and 40+), duration of U.S. residence (categorized <5 and 5+ years; recoded from the year the respondent reported he/she came to live in the U.S.), citizenship status, and age naturalized (18+; recoded from year of naturalization). Citizenship is based on the question: “Is this person a citizen of the United States?” to which respondents would have to answer “Yes, U.S. citizen by naturalization” in order to be counted as a naturalized citizen. Persons marking this response are then asked to indicate the specific year of naturalization. Year of entry is ascertained by the question: “When did this person come to live in the United States?” Respondents are further asked to indicate the specific year of immigration.

Errors and Omissions in ACS Data—As discussed above, citizenship status could be mis-reported. This is the type of error we are most interested in evaluating. However, there are several other possible sources of error in the ACS estimates that we wish to account for. While it is impossible to identify and enumerate every source of error, we attempt to account for the errors that seem most likely to affect our evaluation.

First, ACS estimates are subject to sampling error. To assess the size of sampling error, standard errors and confidence intervals were calculated using the Successive Differences Replication (SDR) method described in the ACS design and methodology documentation (U.S. Census Bureau 2009). To do so, we employed the ACS replicate weights provided by the Census Bureau. For more details, interested readers should refer to the accompanying stata program for the ACS analyses (available on-line), as well as to the useful description of the method provided at the IPUMS website (https://usa.ipums.org/usa/repwt.shtml?q70).

Second, ACS estimates are subject to imputation error. Item nonresponse on the immigration questions is 4.5% on country of birth, 9.0% on year of entry, 5.2% on citizenship, and 15.1% on year of naturalization. The U.S. Census Bureau uses a “hot-deck” method for imputing missing data on these items, but the details of their methodology are unclear. While missingness varies in magnitude, it is worth noting that some sub-populations such as young adult and elderly Mexicans have relatively high rates of missing data on key variables. To the extent that the Census Bureau’s hot deck method does not accurately assign missing values, the naturalized population totals in the ACS will be prone to error.

Third, there may be some reporting error or inconsistencies associated with some of the immigration-related items in the ACS other than citizenship, particularly year of entry and

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1The 1990 Census asked the identical question as the 2010 ACS, and the CPS asks a similar question. “Did you become a citizen of the United States through Naturalization?”

2Naturalized citizens, of course, are the only persons who answer the question about year of naturalization. Thus, 15.1 percent of the citizens had missing data on this question, while the other percentages reported are for the entire foreign-born sample.

3The average allocation rate for person variables in the 2010 ACS was 5.8 percent. For context, rates for other commonly used ACS variables are: year last married (11.4%), employer-provided health insurance (6.2%), hours worked per week (7.7%), occupation (8.1%), and income (22.4%).

Demogr Res. Author manuscript; available in PMC 2014 July 02.
year of naturalization. Ellis and Wright (1998) showed that there were inconsistencies in responses to questions about year of entry and place of residence one year earlier in the Current Population Survey. Recently-arrived immigrants who are engaged in circular migration may find the year of entry question particularly confusing and could plausibly report the year of their first trip, last trip, or a year in between (Redstone and Massey 2004). This suggests that, at least for temporary migrants, year of entry may underestimate duration of U.S. residence. In a related vein, and as we discuss in more detail below in relation to the OIS data, differences in the questions used to determine year of immigration between the two data sources also lend uncertainty to the comparative estimates of the naturalized population.\textsuperscript{vii}

A fourth source of error in the ACS data is coverage error. By coverage error, we refer to discrepancies between the number in a given population represented in the ACS and the actual population that are not due to sampling error or reporting error. Coverage error among the foreign born can arise from inadequate representation of housing units containing foreign born persons in the ACS sample or sampling frame, omissions of individuals from household rosters, or from errors in the sampling weights. If the number of naturalized citizens in the ACS were too low because of coverage error, then this would influence the comparison with OIS based estimates of the number of naturalized citizens independently of reporting error in the ACS.

Many observers suspect that coverage error is higher for the foreign born than the native born population, particularly among the U.S. Mexican-born population. The reason is simply that groups characterized by residential mobility and complex living arrangements, illicit activity, fear of detection, and socio-political marginality are less likely to be picked up in censuses or surveys (Swanson, Siegel and Shroyock 2004). A comprehensive review of this work was provided by Van Hook and Bean (1998). During the 2000s, the two leading producers of estimates of the unauthorized foreign-born population, the Office of Immigration Statistics (OIS) and the Pew Hispanic Center (Pew), assumed that coverage error was, respectively, 10 (Hoefler, Rytina and Baker 2011) and 13 percent (Passel and Cohn 2009) for the unauthorized foreign born, and about 2.5% for other foreign born. OIS rested its assumption about coverage error on a survey conducted in Los Angeles that was then compared to Census counts (Marcelli and Ong 2002). Pew based its assumption on the levels of enumeration error estimated for the 2000 Census, which were calculated by incorporating data from the Accuracy and Coverage Evaluation (ACE) post-enumeration survey\textsuperscript{viii}. Recent evidence based on a triangulation of three different methods that examine trends in births, deaths, and net migration, however, suggests slightly higher coverage error among all Mexican born in 2000 than estimated by OIS and Pew (about 15-20% coverage error), but declining rates throughout the 2000 decade (Van Hook et al. 2012)\textsuperscript{ix}.

\textsuperscript{vii}Additionally, responses to the year of entry and year of naturalization questions may suffer from year heaping, in which respondents are more likely to report years ending in 5 or 0. Examination of the data did suggest some digit preference among respondents for these years, but also showed considerable heaping in years ending with digits 8 and 9, reflecting, we believe, actual spikes in both immigration and naturalization during the late 1990s. Because this type of heaping reflects actual trends in immigration and naturalization, we do not smooth the data. We did produce a supplementary set of results (available upon request) based on smoothed year of entry and year of naturalization data (Myers 1940). The results were very similar to those presented here. This makes sense. Year heaping resulting from digit preference would present the greatest concern if year variables were used as continuous measures, but we designed our analyses to minimize our reliance of these variables. We only use year of entry to drop pre-1990 arrivals from the sample, and for some analyses to discern between those arriving in the last five years versus five or more years. Similarly, we only use year of naturalization to classify respondents as naturalizing at age 18 or older. We discuss the limitations of these indicators and possible implications for the results in the conclusions.

\textsuperscript{viii}Like previous post-enumeration surveys, the 2000 ACE re-interviewed a stratified sample of households shortly following the decennial census. Respondents in the post-enumeration survey were matched to Census respondents in order to assess rates of omission, duplication, and net coverage error. Although the ACE did not produce separate estimates for the foreign born, the Pew Hispanic Center used the ACE to arrive at a 13 percent figure by assuming unauthorized rates of coverage error two to three times those for others within the same race/Hispanic origin, age and sex grouping.
This evidence places coverage error in the range of 2.5% (for legal foreign born), to 10% to 13% (for unauthorized foreign born), to 15-20% (for Mexican foreign-born). Considering that coverage error is likely to be even lower among naturalized citizens than all foreign born or the Mexican born (because they are not unauthorized), we assumed a narrow range of coverage error of 0% to 5%. We adjusted for coverage error in selected analyses by dividing the ACS estimate by one minus the assumed coverage error rate (e.g., in the case of 5% coverage error, the adjusted ACS estimate = ACS estimate/0.95).

**Estimates Based on Office of Immigration Statistics (OIS) Naturalization Records**

OIS-based estimates of the naturalized citizens in 2010 were derived from the numbers of naturalizations in OIS administrative records. OIS data on naturalizations are historical records of events ("flows") occurring over time, so they need to be converted to a "stock" estimate of the number of naturalized citizens for a given point in time (i.e., July 2010) to be comparable with ACS estimates. Once a person becomes a naturalized citizen, they may remain living in the United States and be represented in the 2010 ACS. Alternatively, they may have died or emigrated from the United States, and therefore could not be represented in the 2010 ACS.

To account for deaths and emigration, we used the cohort-component projection method (Rowland 2003). More specifically, for each naturalization cohort, we estimated the number remaining by the time of the 2010 ACS (July 1, 2010 on average) by subtracting an estimate of deaths (D) and emigrants (E) that likely occurred during the follow-up period, that is, between the year of naturalization and July 1, 2010. For example, for a cohort age 20 that naturalized in 1995 (N_{20, 1995}), the number of naturalized citizens age 35 in 2010 (C_{35, 2010}) is:

\[ C_{35, 2010} = N_{20, 1995} - D_{1995} - 2010 - E_{1995} - 2010 \]

More generally, for a given cohort that naturalized at age a in year t,

\[ C_{a+t(2010) - t, 2010} = N_{a, t} - D_{t} - 2010 - E_{t} - 2010 \]

We describe below how we estimated each component of this equation.

**Naturalizations (N_{a, t})**

**Data:** The OIS routinely compiles data obtained from the administrative records of legal immigrant admissions and naturalizations kept by the U.S. Department of Homeland Security. These files are not available as public use data. The naturalization files include a record for each naturalization event occurring in the United States since the mid 1970s. Attached to each record is the demographic and immigration-related information (e.g., age, sex, country of birth, year of admission to the U.S., year of arrival to the U.S.) for the people who became citizens. Unlike the ACS, missing data do not pose significant problems for the OIS data. Out of the 5.4 million naturalization records used to produce our estimates, only 0.05% were missing on age, 0.03% on sex, 0.11% on country of birth, and 0.40% on year of arrival.

\[ ^{1x} \text{The three methods involve (1) comparisons of U.S. births to Mexican born mothers with U.S. born children counted in the ACS; (2) comparisons of estimates of net migration from Mexico to the United States based on Mexican census data and U.S. Census data; and (3) comparisons of deaths to the Mexican born in the United States, and the underlying population that "produced" those deaths, with the number enumerated in the Census and ACS.} \]

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Because no public use data are available, the Office of Immigration Statistics generously provided a file to us containing detailed cross-tabulations of the number of naturalizations by year of naturalization, age at naturalization\textsuperscript{x}, sex, year of arrival, and region of birth (Mexico, Central American/Caribbean, Asia, Other). Combined, the cross-tabulations described the size and characteristics of 122,660 different naturalization cohorts. Together, these cohorts experienced 5.4 million naturalizations between January 1, 1990 and July 1, 2010\textsuperscript{xi}. Of course, we later combined these groups for presentation purposes, but the underlying detail granted us considerable flexibility.

**Errors and Omissions in OIS Naturalization Data:** Like the ACS data, the OIS data are subject to errors and omissions. First, the OIS data include only those who naturalized as adults age 18 and older. Children ages 0-17 may obtain “derivative” citizenship from their parents when they naturalize, but the U.S. government does not produce easily accessible or interpretable statistics on derivative citizenship among children. We therefore limited our analyses (for both the OIS and ACS estimates) to those who naturalized as adults age 18+.

Second, to be included in the OIS naturalization file, a person must have a matching record in the computerized OIS admission file and these files do not extend back before 1972. Thus pre-1972 arrivals (who contributed about 10% of all naturalizations between 1990 and 2010) are not in the computerized OIS naturalization file. To minimize this error, we limited our naturalization estimates (for both OIS and ACS) to those who arrived in the United States in 1990 or later.

Third, naturalization data were not available for the approximately 100,000 LPR records out of 1.7 million that were not originally included in DHS flow data between 2001 and 2010 due to delayed data entry. For naturalizations occurring between 2001 and 2010, we therefore proportionately adjusted the number of naturalizations upward by a small percentage in order to add back in the 100,000 missing records. Specifically, we weighted the 1,661,815 cases that naturalized after 2000 by the ratio: (1,761,816 / 1,661,816).

Fourth, information in the OIS data on year of arrival may be unreliable because it is based on a variety of sources (i.e., sometimes determined from other documents, sometimes self-reported, etc.). Additionally, self-reported year of arrival is based on a question about the year of the respondents’ last trip to the United States, which is different from the census question (year the respondent came to the U.S. to live). In our analyses, we therefore use year of arrival in a limited manner, namely to identify those who arrived in 1990 or later, and to discern recently-arrived immigrants (with less than 5 years of U.S. residence) from longer-resident immigrants.

**Deaths (\(D_{\text{L},2010}\))**—We estimated the likely number of deaths to each naturalization cohort by multiplying the appropriate age-, sex-, and year-specific annual probability of dying (\(q_{y}\)) by the number remaining in the cohort for each year of the follow-up period. No life table for naturalized citizens exists, so we used the life tables produced by the Social Security

\textsuperscript{x} Even though missingness in the OIS data is not high enough to bias estimates of the characteristics of naturalized citizens, we did not want to discard the records with missing data or our estimates of naturalized citizens would be too low. Since the OIS data was given to us in the form of cross tabulations rather than individual records, we could not use standard methods to handle missing data. Instead, we simply distributed the records with missing data proportionately across the categories of each variable (i.e., matching the observed distributions).

\textsuperscript{xi} OIS provided data for five-year age groups. We subdivided the data into single-year age groups for the purpose of performing the projections (which are considerably easier computationally for single years of age), with the numbers of naturalizations equally allocated across single-year age groups. After the projection was done, the age groups were collapsed into very broad age categories (18-29, 30-39, 40+) for the purpose of comparison with the ACS.

\textsuperscript{xii} OIS did not report month of naturalization, so we estimated the number of naturalizations from January 1, 2010 through July 1, 2010 as half the total number occurring in the 2010 calendar year.

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Administration (Bell and Miller 2005), which estimate mortality risks for the United States based on NCHS vital statistics for ages 0-64 and Medicare files for ages 65 and older across all years of the projection period. Thus they yield more accurate estimates of old-age mortality (with less age misreporting) and reflect the mortality experiences of those eligible for Medicare, including naturalized immigrants. The Social Security Life Tables are available from the Max Planck Institute's Human Life-Table Database (http://www.lifetable.de/). Mortality is a small component of the OIS-based estimates, and the estimates do not vary much when alternative U.S. life tables are used except for the oldest age groups (not a major concern because over 90% of the naturalized citizens in our sample are younger than 65).

Emigrants (E_t,2010)—We estimated the number of emigrants for each naturalization cohort by applying a set of race-, age- and duration-specific emigration rates each year of the projection period. Because no official statistics on emigration from the United States have been collected since 1956 (Kraly 1998), emigration among the foreign born has been estimated with a variety of indirect demographic methods, which have yielded a range of estimates. Because of uncertainty about emigration, we apply four different sets of estimates. The first assumes no emigration at all, and the other three come from published estimates, which roughly correspond with "low", "moderate", and "high" levels of emigration. For the latter three, we used rates that vary by 5-year age group, sex, race or country of birth (Mexico vs. other), and duration of U.S. residence (0-4, 5-9, and 10+ years).

The "low" estimates are those produced by Ahmed and Robinson (1994). These are based on comparisons of cohorts followed over time between 1980 and 1990 censuses. The Ahmed and Robinson rates are broken down by race/ethnicity: Hispanic, white, black, and Asian. We used the Hispanic rates for Mexicans and Central/South Americans, the white rates for Europeans and Canadians, the Asian rates for all Asians, and the black rates for all other immigrants (mostly Caribbeans and Africans).

The "moderate" estimates are those based on Social Security work history files (Schwabish 2009). These use a three-year discontinuation in U.S.-reported earnings as an indicator of emigration. Because unauthorized immigrants do not qualify for Social Security, the Social Security-based rates may most closely describe the emigration patterns of legal immigrants and (by extension) naturalized citizens. Our rates came from a prediction model provided to us by Schwabish, which permitted us to produce annual emigration rates by age, sex, duration of residence, and Mexican origin. We used the Mexican rates for Mexicans and Central Americans, and the non-Mexican rates for all other immigrants.

Finally, the "high" estimates are those based on the CPS-matching method (Van Hook, Zhang, Bean, and Passel 2006). These use attrition from the Current Population Survey to estimate emigration. We used this method together with data from the 1996-2009 CPS to produce annual probabilities of emigration for naturalized foreign-born individuals in the CPS. We then estimated a prediction model of the probability of emigration, and used the estimated coefficients to construct predicted emigration rates by age, sex, duration of

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xiii We gratefully acknowledge the assistance of Jonathon Schwabish for providing the prediction model. The model was discrete-time event history model (logistic regression) predicting the odds of emigrating in a given year. The model was estimated on a person-year file that contains a record for every foreign-born Social Security recipient from the time of entry into the Social Security system until emigration or censorship. We used the coefficients to calculate the log-odds of annual emigration for each demographic group, which we then converted to predicted probabilities (i.e., annual emigration rates).
residence, and Mexican origin. We used the Mexican rates for Mexicans and Central Americans, and the non-Mexican rates for all other immigrants.

Figure 1 illustrates the three sets of emigration rates for male Mexican immigrants with 0-4 years of U.S. residence. Readers will notice that the "low", "moderate", and "high" labels are broadly descriptive but are only partially accurate. Their rank order changes around age 55. At younger ages, the Ahmed/Robinson "low" rates are lowest, the Van Hook "high" rates are highest, and the Schwabish "moderate" rates fall in the middle. However, at older ages (55+), the Van Hook "high" rates fall below the Schwabish "moderate" rates.

**Projection Details**—We projected forward each naturalization cohort from the year of its naturalization to July 1, 2010 (the ACS estimate date), subtracting deaths and emigrants and adding one year of age to the remaining members of the cohort, for each year of the follow-up period. The first and last years of the follow-up period consisted of only six months. In the first year, we assumed naturalizations occurred evenly throughout the year, so the duration of the first year averaged six months. In the last year (2010), the projection period was only six months (from January 1 through July 1). The projections were conducted using Stata for all 122,660 naturalization cohorts. To compare the projected numbers of naturalized citizens for July 1, 2010 with 2010 ACS estimates, we collapsed the surviving cohorts into manageable groupings: by country/region; by country/region, sex, and duration of residence (0-5 and 5+ years); and by Mexican origin, age grouping (18-29, 30-39, and 40+), and sex.

**Comparing OIS with ACS estimates**

We compare each of the OIS- and ACS-based estimates of naturalizations. We report the difference as a raw number (ACS - OIS) and a percentage difference ([ACS - OIS]/OIS x 100). We take into consideration three criteria for determining the presence of reporting error. First, the difference between the OIS-based estimates of naturalizations for a given sub-population (e.g., Mexican immigrant women) and the corresponding ACS estimate must be significantly different. That is, the OIS estimate must fall outside the bounds of the ACS 95 percent confidence interval. Second, the ACS estimate must fall outside the bounds of OIS-based estimates given a plausible range of assumptions about emigration. Third, the OIS estimate must fall outside the bounds of ACS estimates given a plausible range of assumptions about coverage error. In reporting results, we first focus on Tables 1-3 on the size of the OIS-ACS differences and whether they may be explained by sampling error or by alternative assumptions about emigration. Later, in Tables 4-5, we add in the complexity of making alternative assumptions about coverage error.

**Results**

In Table 1 we report the number of naturalizations from the OIS tables, components of change, and the resulting estimate of naturalized citizens, as well as the corresponding estimate from the ACS. These figures are reported for the entire foreign-born population and separately for Mexicans, Central Americans/Caribbeans, Asians, and "Other" immigrants, with varying levels of emigration assumed.

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xvi We adjusted the estimates for return migration to reduce the influence of circular migration on the emigration rates. Additionally, we use the model to produce estimates rather than simply producing rates for each demographic group separately because of sample size constraints.

xv We estimated the number of deaths and emigrants simultaneously for each year of the follow-up period. That is, we used mathematical equations developed for multiple decrement life tables, which take into account the size of the cohort at all instances in time that it is at risk for death and emigration (Preston, Heuveline, and Guillot 2001).

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The ACS estimates about 5,260,000 foreign-born residents arriving in the U.S. after 1989 and naturalizing as adults. This is nearly identical to the OIS estimate (5,316,000 naturalizations) when we assume zero emigration, an implausible assumption. However, if we account for emigration, we estimate significantly more naturalized citizens in the ACS than the OIS-based estimates. Expressed as a percentage of the OIS estimate, the magnitude of the discrepancy increases from 4,7 to 10 percent and becomes statistically significant when we apply the “low”, “moderate” and “high” emigration rates, respectively.

Table 1 indicates that the OIS-ACS difference is concentrated largely among Mexican immigrants, among whom the discrepancy is significant and ranges from 25 percent (assuming no emigration) to 38 percent (assuming high emigration). Unlike the previous work of Passel and Clark (1997), comparison of ACS and OIS estimates do not suggest significant levels of misreporting among Central Americans/Caribbeans, for whom the ACS estimate is significantly higher than the OIS-based estimate only when assuming “moderate” or “high” levels of emigration. Also, when we assume no emigration among Asians, the ACS estimates significantly fewer naturalizations than are estimated in the OIS data. This is probably because emigration is almost certainly not nonexistent for this group. When we assume low or moderate emigration, the OIS-ACS differences are insignificant, and at high levels of emigration, the ACS-based estimate is only 3 percent higher than the OIS estimate. Finally, naturalizations among immigrants born elsewhere in the world are not significantly higher in the ACS when we assume no emigration. But the OIS-ACS gap increases as the assumed rate of emigration increases, from 5 to 8 to 10 percent, respectively, at “low”, “moderate”, and “high” levels of emigration.

Table 2 reports the naturalization estimates by sex, region of birth, and duration of U.S. residence. For both men and women from all origin regions, the estimated number of naturalized citizens in the ACS is substantially and significantly higher than the OIS-based estimates among immigrants with fewer than five years in the U.S. For example, the number of naturalized Mexican men with fewer than five years of U.S. residence is nearly 27 times higher (2587%) in the ACS than the OIS estimates. Another way to express this is that among the 16 thousand reporting as citizens in the ACS, only about 600 (or about 4 percent) are likely to actually be naturalized citizens. Among those in the U.S. for five or more years, the OIS-ACS gap is much lower in relative terms, and concentrated among Mexican men. The 2010 ACS estimates about 250,000 naturalizations among Mexican-born men with 5 or more years of U.S. residence (i.e., arrived in 1995 or later), and naturalizing as adults. Even when assuming no emigration among Mexican men with OIS naturalization records, the ACS estimate is significantly higher by 37 percent, and this increases to 41, 43 and 54 percent when “low”, “moderate”, and “high” rates of emigration, respectively, are assumed. Though ACS estimates are significantly higher among Mexican women as well, the magnitude of estimated over-reporting is substantially lower than among Mexican men, ranging from 7 percent at low levels of emigration to 17 percent at high rates of emigration.

In Table 3, OIS and ACS estimates are presented for Mexican and non-Mexican men and women by age group by varying rates of emigration. We note that the OIS estimates do not always decline as emigration increases from the “low” to the “moderate” to the “high” series because of age crossovers in various emigration estimates. Regardless of assumptions about emigration, ACS estimates are especially high relative to the OIS-based estimates among Mexican men of all age groups and Mexican women aged 40 and older. The same pattern does not hold among non-Mexicans, among whom the discrepancy remains relatively low across all age groups.

Up to this point, our ACS estimates of naturalization have not been adjusted for possible under-coverage of the foreign-born in the ACS. To illustrate the impact of coverage error,
we report in Table 4 percentage differences between the ACS and OIS estimates at three levels of assumed coverage error. For all groups, the OIS-ACS discrepancies increase as rates of assumed emigration and coverage error increase. For example, among Mexican-born men aged 18-29, the gap is about 26 percent if no coverage error is assumed (assuming no emigration). This increases to 29 percent when we assume 2.5 percent coverage error, and to 32 percent when we assume 5 percent coverage error. The same pattern holds for Mexican women 18-29, though the magnitude of over-reporting is substantially lower, ranging from -1 percent to 4 percent (assuming no emigration), and is not significant in any instance. This shows that the naturalization reporting error estimates shown in Tables 1-3 are low-end estimates. They will be higher for groups that are underrepresented in the ACS.

Finally, we summarized the OIS-ACS differences and assessed whether these can be explained by sources other than reporting error in Table 5. In the first column, we present the percentage OIS-ACS difference while assuming moderate emigration and no coverage error. In the next three columns, we designate with a “Y” the differences that are greater than can be explained by (1) sampling error (assuming moderate emigration and no coverage error), (2) alternative plausible assumptions about emigration (assuming no coverage error), and (3) alternative plausible assumptions about coverage error (assuming moderate emigration). Finally, the last column indicates with a “Y” whether the ACS-OIS difference is so large that it cannot be explained by any of these three sources of error and are therefore is very likely to reflect reporting error. For example, the OIS-ACS gap for Mexicans is 3.1 percent if we assume “moderate” levels of emigration and no coverage error (2<sup>nd</sup> row). The “Y” in the second column indicates that this gap is statistically significant. The “Y” in the third column indicates that the gap remains no matter what we assume about emigration (with no coverage error). The “Y” in the fourth column indicates that the gap remains no matter what we assume about coverage error (with moderate emigration). Finally, “Y” in the fifth column indicates that the gap remains significant under all combinations of plausible assumptions about sampling error, emigration, and coverage error.

Overall, the results confirm that the OIS-ACS discrepancies for three groups are large enough to suggest reporting error among: (1) all immigrants with less than five years of U.S. residence, (2) Mexican men of all ages and durations of residence, and (3) Mexican women ages 40 and older. Of course, there may be alternative explanations for the discrepancies other than reporting error, but our analyses eliminate three of the major alternative explanations.

Conclusion

Naturalization is an important, though under-examined, indicator of immigrants’ social and political integration, and numerous government-sponsored population surveys include questions about citizenship status (Costanzo, Davis and Malone 2002). It is therefore important to gauge the degree to which immigrants may misreport their citizenship status in response to such questions. To the best of our knowledge, estimates of the misreporting of naturalization have not been generated since the mid-1990s (Passel and Clark 1997). Our objective in this paper has been to update this research and provide the first set of estimates of reporting error among immigrants in the American Community Survey (ACS).

Naturalization reporting error was estimated by comparing a demographic estimate based on administrative data from the Department of Homeland Security’s (DHS) Office of Immigration Statistics (OIS), with the number of naturalizations reported in the 2010 ACS. Similar to the earlier work of Passel and Clark (1997), we find that the ACS estimates of naturalized citizens are much higher than OIS-based estimates among immigrants from all regions of the world who have lived in the U.S. fewer than five years. Among immigrants
residing in the U.S. for five or more years, the OIS-ACS discrepancy is concentrated among those born in Mexico, especially men of all ages and women age 40 or older. In fact, the discrepancy is particularly large for both men and women age 40+, which is a little surprising given that the unauthorized population is concentrated among young and working-aged adults, and we expected the unauthorized to be most likely to misreport. Nevertheless, these patterns cannot be explained by sampling error, alternative assumptions about emigration, or coverage error.

We can only speculate as to the reasons behind the apparently high rates of over-reporting among Mexican immigrants. There remains the remote possibility that the discrepancies derive from inaccurate assessments of mortality, or by differences in how duration of residence is measured between the OIS and ACS. However, the results seem more likely to reflect the fact that large portions of Mexicans, particularly young Mexican men, are unauthorized migrants. When compared with the total foreign born population, the 2010 estimates of the unauthorized population (Hoefler, Rytina, and Baker 2011) suggest that 55% of Mexican foreign born are unauthorized compared with 28% of Central Americans/Caribbeans, 8.5% of Asians, and 10% of all other national origins. Estimates of the Mexican unauthorized population by age and sex are difficult to locate, but one report based on the 2000 Census (Passel, Van Hook, and Bean 2004) suggests that Mexican-born men and women younger than 30 were the most likely to be unauthorized among all age, sex, and national origin groups. For example, 89.4% were estimated to be unauthorized compared with 34.6% of same-aged non-Mexican foreign-born men. Such high prevalence of unauthorized status may help explain the large OIS-ACS discrepancy among young Mexican-born men.

In the case of Mexican immigrants age 40+, the results are more difficult to explain since the proportion unauthorized for this age group is lower than younger Mexican immigrants. Perhaps one clue is that most of these migrants arrived in the United States as older adults (due to the fact that we restricted the sample to immigrants arriving in the U.S. in 1990 or later to be consistent with the population reflected in the OIS data). Among all naturalized Mexican immigrants counted in the 2010 ACS, just 14 percent of those aged 40-64 and 8 percent of those aged 65+ arrived in the U.S. in 1990 or later. We suspect that the distinctive group of older-arriving immigrants in our sample knows little to no English, may well be unauthorized migrants reuniting with adult children who have settled in the U.S., and as such, may live in complex multi-generational households. To the extent that these attributes characterize older-arriving Mexican migrations, these factors may combine to lend difficulty in collecting complete and accurate survey data about them, and thus be in part responsible for their high rates of over-reporting of naturalization. Supplementary analyses further reveal high levels of missing data on immigration items for this group, so missing data and inaccurate missing data allocations may also help explain their high OIS-ACS gap in the number of naturalized citizens.

\[\text{XVI}\] However, we think this is unlikely. Fewer than 10% of the naturalized citizens in our analyses were age 65 or older. Additionally, supplementary analyses show that the OIS-ACS discrepancy is equally high among the older age groups with lower mortality rates (age 40-64) and higher mortality rates (age 65+).

\[\text{XVII}\] We think this is unlikely. To explain, the ACS question, "When did this person come to live in the United States?" lacks specificity and it is possible that respondents who have made multiple trips to the U.S. would report their first, last, or any trip in between (Redstone and Massey 2004). However, the primary source of year of entry information in the OIS data is more specific, asking respondents to indicate their "Date of Last Arrival (mm/dd/yyyy)." Thus, circular migrants would be more likely to answer the ACS question with the year of their first or second trip, while indicating their most recent year of arrival (a later year) on their LPR application form. As an example, imagine a Mexican immigrant who first entered the country as an unauthorized immigrant in 1985 and made annual trips back and forth before legalizing in 1995 and naturalizing by 2000. He/she may plausibly indicate on his/her LPR application 1995 as the year of last arrival, but an earlier year (say 1985) as the year he/she first came to live on the ACS. In our analysis, this person would be excluded from the ACS sample of post-1989 arrivals but included in the OIS data. To the extent that this is the common scenario among circular migrants (and we have no way of confirming that it is), this would lead to fewer naturalized immigrants being counted in the ACS than indicated in the OIS data, not more as we observe.
One difference between our results and those of Passel and Clark is that they find over-reporting of naturalization among longer-term immigrants for both Mexicans and Central Americans. Our results do not suggest substantively significant levels of naturalization over-reporting among immigrants born in countries other than Mexico. We do not have a strong explanation for this difference from Passel and Clark. It may arise from a real change in reporting among Central Americans, or it may arise from methodological differences, such as in how emigration is treated. The OIS-ACS gap for Central Americans could not be explained by sampling error or coverage error, but was significant when we assumed moderate or high levels of emigration. Still another divergence from the Passel and Clark study is that we found little evidence of over-reporting among Mexican women, particularly those younger than 40. This does not necessarily conflict with Passel and Clark’s finding concerning Mexicans, but instead builds on it since they did not break down their results by Mexican-origin, age and sex.

Finally, our analyses suggest that our conclusions are robust to alternative assumptions about emigration and coverage error. Even if there were no emigration and no coverage error at all, the ACS estimates would be higher than the OIS estimates for many groups. And, when we assumed higher (non-zero) emigration, this reduced the OIS-based estimates, which then further increased the OIS-ACS discrepancy. Similarly, when we accounted for coverage error of the foreign born in the ACS, this again increased the gap between OIS and ACS estimates. Moreover, it is clear that if coverage error for some groups (such as Mexican male immigrants) were even higher than 5% (which we assumed to be on the “high end”), this would serve to further increase the OIS-ACS gap. Passel and Clark’s (1997) evaluation of naturalization reporting error appears to have assumed no coverage error and low emigration rates. Thus their estimates probably represented lower-bound estimates of reporting error.

In conclusion, it is reassuring that the results do not indicate significant naturalization reporting error among non-Mexicans with five or more years of U.S. residence and young Mexican women. On the other hand, the results continue to provide evidence for naturalization over-reporting for all groups of Mexican men, older Mexican women, and all recent arrivals, regardless of assumptions about emigration or coverage error. We therefore recommend that ACS data on citizenship be accepted at face value for all groups except those with less than five years of U.S. residence, Mexican men, and older Mexican women.

Acknowledgments

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Figure 1.
Estimates of Foreign-born Emigration
Table 1
Estimated Naturalized Citizens (thousands) based on OIS naturalization records and ACS, by Region of Birth, July 2010 (see notes below)

<table>
<thead>
<tr>
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<th>OIS-based estimates (components of change between Jan 1, 1990 and July 1, 2010)</th>
<th>Comparison with 2010 American Community Survey (ACS)</th>
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<td></td>
<td>Naturalizations(^1)</td>
<td>Deaths(^2)</td>
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<td>Asia</td>
<td></td>
<td></td>
</tr>
<tr>
<td>No Emigration(^3)</td>
<td>2,466</td>
<td>91</td>
</tr>
<tr>
<td>A/R “low” Emigration</td>
<td>2,466</td>
<td>87</td>
</tr>
<tr>
<td>SSA “Moderate” Emigration</td>
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<td>83</td>
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<tr>
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<td>84</td>
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<tr>
<td>Other Regions</td>
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<td></td>
</tr>
<tr>
<td>No Emigration(^3)</td>
<td>1,767</td>
<td>65</td>
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<tr>
<td>A/R “low” Emigration</td>
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</tr>
<tr>
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<tr>
<td>VH “high” Emigration</td>
<td>1,767</td>
<td>61</td>
</tr>
</tbody>
</table>

Note: Estimates are for naturalized citizens who naturalized between 1/1/1990 and 7/1/2010

\(^1\) Excludes naturalizations of immigrants who arrived before 1990 or who naturalized as children aged 0-17.

\(^2\) Based on Social Security administration lifetable (Bell and Miller 2005)


\(^4\) Diff = (ACS - OIS)

Demogr Res. Author manuscript; available in PMC 2014 July 02.
\[ \text{%Diff} = \frac{(\text{ACS} - \text{OIS})}{\text{OIS}} \times 100 \]

Absolute difference between OIS and ACS estimate is greater than twice the standard error of the ACS estimate.
<table>
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<th>&lt;5 years U.S. Residence</th>
<th></th>
<th>5+ Years of U.S. Residence</th>
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<td></td>
<td>OIS¹</td>
<td>ACS¹</td>
<td>% Diff²</td>
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<tr>
<td>Men</td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Mexico</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>No Emigration¹</td>
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<td>* 183</td>
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</tr>
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<td>* 178</td>
<td>41</td>
</tr>
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<td>* 175</td>
<td>43</td>
</tr>
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<td>VH “high” Emigration</td>
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<td>2590</td>
<td>* 162</td>
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</tr>
<tr>
<td>Central American/Caribbean</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>No Emigration¹</td>
<td>1.2</td>
<td>1366</td>
<td>* 322</td>
<td>−1</td>
</tr>
<tr>
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<td>1.2</td>
<td>1382</td>
<td>* 313</td>
<td>2</td>
</tr>
<tr>
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<td>1.1</td>
<td>1404</td>
<td>* 305</td>
<td>5</td>
</tr>
<tr>
<td>VH “high” Emigration</td>
<td>1.1</td>
<td>1431</td>
<td>* 282</td>
<td>13</td>
</tr>
<tr>
<td>Asia</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>No Emigration¹</td>
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<td>395</td>
<td>* 1,029</td>
<td>−9</td>
</tr>
<tr>
<td>A/R “low” Emigration</td>
<td>4.9</td>
<td>403</td>
<td>* 960</td>
<td>−3</td>
</tr>
<tr>
<td>SSA “Moderate” Emigration</td>
<td>4.9</td>
<td>403</td>
<td>* 956</td>
<td>−2</td>
</tr>
<tr>
<td>VH “high” Emigration</td>
<td>4.9</td>
<td>404</td>
<td>* 949</td>
<td>−1</td>
</tr>
<tr>
<td>Other Regions</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>No Emigration¹</td>
<td>4.5</td>
<td>360</td>
<td>* 767</td>
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<tr>
<td>A/R “low” Emigration</td>
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<td>369</td>
<td>* 732</td>
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<tr>
<td>SSA “Moderate” Emigration</td>
<td>4.4</td>
<td>369</td>
<td>* 715</td>
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</tr>
<tr>
<td>VH “high” Emigration</td>
<td>4.4</td>
<td>370</td>
<td>* 711</td>
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</tr>
<tr>
<td>Women</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mexico</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>No Emigration¹</td>
<td>.8</td>
<td>1689</td>
<td>* 281</td>
<td>7</td>
</tr>
<tr>
<td>A/R “low” Emigration</td>
<td>.8</td>
<td>1700</td>
<td>* 276</td>
<td>9</td>
</tr>
<tr>
<td>SSA “Moderate” Emigration</td>
<td>.8</td>
<td>1727</td>
<td>* 302</td>
<td>13</td>
</tr>
<tr>
<td>VH “high” Emigration</td>
<td>.8</td>
<td>1726</td>
<td>* 259</td>
<td>17</td>
</tr>
<tr>
<td>Central American/Caribbean</td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>No Emigration¹</td>
<td>1.2</td>
<td>1097</td>
<td>* 449</td>
<td>−6</td>
</tr>
<tr>
<td>A/R “low” Emigration</td>
<td>1.2</td>
<td>142</td>
<td>* 439</td>
<td>−3</td>
</tr>
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</table>

*Demogr Res. Author manuscript; available in PMC 2014 July 02.*
<table>
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<tr>
<th></th>
<th>&lt;5 years U.S. Residence</th>
<th>5+ Years of U.S. Residence</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>OIS</td>
<td>ACS</td>
</tr>
<tr>
<td>SSA &quot;Moderate&quot; Emigration</td>
<td>1.2</td>
<td>1128*</td>
</tr>
<tr>
<td>VH &quot;high&quot; Emigration</td>
<td>1.2</td>
<td>1127*</td>
</tr>
<tr>
<td><strong>Asia</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>No Emigration</td>
<td>11.3</td>
<td>208*</td>
</tr>
<tr>
<td>A/R &quot;low&quot; Emigration</td>
<td>11.2</td>
<td>212*</td>
</tr>
<tr>
<td>SSA &quot;Moderate&quot; Emigration</td>
<td>11.1</td>
<td>214*</td>
</tr>
<tr>
<td>VH &quot;high&quot; Emigration</td>
<td>11.1</td>
<td>216*</td>
</tr>
<tr>
<td><strong>Other Regions</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>No Emigration</td>
<td>6.3</td>
<td>361*</td>
</tr>
<tr>
<td>A/R &quot;low&quot; Emigration</td>
<td>6.2</td>
<td>369*</td>
</tr>
<tr>
<td>SSA &quot;Moderate&quot; Emigration</td>
<td>6.1</td>
<td>371*</td>
</tr>
<tr>
<td>VH &quot;high&quot; Emigration</td>
<td>6.1</td>
<td>373*</td>
</tr>
</tbody>
</table>

Note: Estimates are for naturalized citizens who naturalized between 1/1/1990 and 7/1/2010

1 Excludes naturalized immigrants who arrived before 1990 or who naturalized as children aged 0-17.

2 %Diff = (ACS - OIS)/OIS * 100

3 A/R = Ahmed & Robinson 1994 ("low"), SSA = Social Security (Schwabish 2009) ("moderate"), VH = Van Hook et al. 2006 ("high")

* Absolute difference between OIS and ACS estimate is greater than twice the standard error of the ACS estimate.
Table 3
Estimated Naturalized Citizens of all Years of U.S. Residence (thousands), by Age, Sex, and Mexican Origin, July 2010 (see notes below)

<table>
<thead>
<tr>
<th>Age Group</th>
<th>Men</th>
<th>Women</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>OIS 1</td>
<td>ACS 1</td>
</tr>
<tr>
<td>Mexicans</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Age 18-29</td>
<td></td>
<td></td>
</tr>
<tr>
<td>No Emigration d</td>
<td>46</td>
<td>12</td>
</tr>
<tr>
<td>A/R “low” Emigration</td>
<td>45</td>
<td>58</td>
</tr>
<tr>
<td>SSA “Moderate” Emigration</td>
<td>45</td>
<td>13</td>
</tr>
<tr>
<td>VH “high” Emigration</td>
<td>42</td>
<td>16</td>
</tr>
<tr>
<td>Age 30-39</td>
<td></td>
<td></td>
</tr>
<tr>
<td>No Emigration d</td>
<td>82</td>
<td>19</td>
</tr>
<tr>
<td>A/R “low” Emigration</td>
<td>79</td>
<td>101</td>
</tr>
<tr>
<td>SSA “Moderate” Emigration</td>
<td>78</td>
<td>23</td>
</tr>
<tr>
<td>VH “high” Emigration</td>
<td>72</td>
<td>28</td>
</tr>
<tr>
<td>Age 40+</td>
<td></td>
<td></td>
</tr>
<tr>
<td>No Emigration d</td>
<td>55</td>
<td>52</td>
</tr>
<tr>
<td>A/R “low” Emigration</td>
<td>54</td>
<td>107</td>
</tr>
<tr>
<td>SSA “Moderate” Emigration</td>
<td>52</td>
<td>55</td>
</tr>
<tr>
<td>VH “high” Emigration</td>
<td>48</td>
<td>59</td>
</tr>
<tr>
<td>Non-Mexicans</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Age 18-29</td>
<td></td>
<td></td>
</tr>
<tr>
<td>No Emigration d</td>
<td>282</td>
<td>5</td>
</tr>
<tr>
<td>A/R “low” Emigration</td>
<td>267</td>
<td>20</td>
</tr>
<tr>
<td>SSA “Moderate” Emigration</td>
<td>277</td>
<td>11</td>
</tr>
<tr>
<td>VH “high” Emigration</td>
<td>266</td>
<td>21</td>
</tr>
<tr>
<td>Age 30-39</td>
<td></td>
<td></td>
</tr>
<tr>
<td>No Emigration d</td>
<td>587</td>
<td>-25</td>
</tr>
<tr>
<td>A/R “low” Emigration</td>
<td>548</td>
<td>14</td>
</tr>
<tr>
<td>SSA “Moderate” Emigration</td>
<td>564</td>
<td>-1</td>
</tr>
<tr>
<td>VH “high” Emigration</td>
<td>542</td>
<td>20</td>
</tr>
<tr>
<td>Age 40+</td>
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<td></td>
</tr>
<tr>
<td>No Emigration d</td>
<td>1258</td>
<td>-56</td>
</tr>
<tr>
<td>A/R “low” Emigration</td>
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<td>1</td>
</tr>
<tr>
<td>SSA “Moderate” Emigration</td>
<td>1147</td>
<td>55</td>
</tr>
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</table>

Demogr Res. Author manuscript; available in PMC 2014 July 02.
<table>
<thead>
<tr>
<th></th>
<th>Men</th>
<th></th>
<th></th>
<th>Women</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>OIS</td>
<td>ACS</td>
<td>Diff 2</td>
<td>% Diff</td>
<td>OIS</td>
<td>ACS</td>
<td>Diff 2</td>
</tr>
<tr>
<td>VH &quot;high&quot; Emigration</td>
<td>1144</td>
<td>58</td>
<td>5*</td>
<td>1385</td>
<td>131</td>
<td>9*</td>
</tr>
</tbody>
</table>

Note: Estimates are for naturalized citizens who naturalized between 1/1/1990 and 7/1/2010

1 Excludes naturalized immigrants who arrived before 1990 or who naturalized as children aged 0-17.

2 Diff = (ACS - OIS)

3 %Diff = (ACS - OIS)/OIS * 100

4 A/R = Ahmed & Robinson 1994 ("low"), SSA = Social Security (Schwabish 2009) ("moderate"), VH = Van Hook et al. 2006 ("high")

* Absolute difference between OIS and ACS estimate is greater than twice the standard error of the ACS estimate.
Table 4

Percentage Difference between OIS and ACS estimates while Varying ACS Coverage Error Assumptions, by Mexican Origin, Age, and Sex (see notes below)

<table>
<thead>
<tr>
<th></th>
<th>Men</th>
<th>Women</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>0% Coverage Error</td>
<td>2.5% Coverage Error</td>
</tr>
<tr>
<td>Mexicans</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Age 18-29</td>
<td></td>
<td></td>
</tr>
<tr>
<td>No Emigration</td>
<td>26*</td>
<td>29*</td>
</tr>
<tr>
<td>A/R “low” Emigration</td>
<td>29*</td>
<td>32*</td>
</tr>
<tr>
<td>SSA “Moderate” Emigration</td>
<td>29*</td>
<td>32*</td>
</tr>
<tr>
<td>VH “high” Emigration</td>
<td>37*</td>
<td>41*</td>
</tr>
<tr>
<td>Age 30-39</td>
<td></td>
<td></td>
</tr>
<tr>
<td>No Emigration</td>
<td>23*</td>
<td>27*</td>
</tr>
<tr>
<td>A/R “low” Emigration</td>
<td>27*</td>
<td>30*</td>
</tr>
<tr>
<td>SSA “Moderate” Emigration</td>
<td>29*</td>
<td>32*</td>
</tr>
<tr>
<td>VH “high” Emigration</td>
<td>39*</td>
<td>43*</td>
</tr>
<tr>
<td>Age 40+</td>
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<td></td>
</tr>
<tr>
<td>No Emigration</td>
<td>94*</td>
<td>99*</td>
</tr>
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<td>104*</td>
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<tr>
<td>SSA “Moderate” Emigration</td>
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<td>110*</td>
</tr>
<tr>
<td>VH “high” Emigration</td>
<td>122*</td>
<td>127*</td>
</tr>
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</table>

Non-Mexicans

<table>
<thead>
<tr>
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<th>Men</th>
<th>Women</th>
</tr>
</thead>
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</tr>
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<td>4</td>
</tr>
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<td>10*</td>
</tr>
<tr>
<td>SSA “Moderate” Emigration</td>
<td>4</td>
<td>6*</td>
</tr>
<tr>
<td></td>
<td>Men</td>
<td>Women</td>
</tr>
<tr>
<td>------------------</td>
<td>----------------------</td>
<td>----------------------</td>
</tr>
<tr>
<td></td>
<td>0% Coverage Error</td>
<td>2.5% Coverage Error</td>
</tr>
<tr>
<td>VH “high” Emigration</td>
<td>8*</td>
<td>11*</td>
</tr>
<tr>
<td>Age 30-39</td>
<td></td>
<td></td>
</tr>
<tr>
<td>No Emigration</td>
<td>-4*</td>
<td>-2*</td>
</tr>
<tr>
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<td>2*</td>
<td>5*</td>
</tr>
<tr>
<td>SSA “Moderate” Emigration</td>
<td>0*</td>
<td>2*</td>
</tr>
<tr>
<td>VH “high” Emigration</td>
<td>4*</td>
<td>6*</td>
</tr>
<tr>
<td>Age 40+</td>
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<td></td>
</tr>
<tr>
<td>No Emigration</td>
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<td>-2*</td>
</tr>
<tr>
<td>A/R “low” Emigration</td>
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<td>3*</td>
</tr>
<tr>
<td>SSA “Moderate” Emigration</td>
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<td>8*</td>
</tr>
<tr>
<td>VH “high” Emigration</td>
<td>5*</td>
<td>8*</td>
</tr>
</tbody>
</table>

1 (ACS - OIS)/OIS * 100


* Absolute difference between OIS and ACS estimate is greater than twice the standard error of the ACS estimate.
Table 5
Sensitivity of OIS-ACS difference to sampling error, assumptions about emigration, and assumptions about coverage error (see notes below)

<table>
<thead>
<tr>
<th>Difference is greater than can be explained by plausible assumptions about:</th>
<th>% Difference</th>
<th>Sampling Error</th>
<th>Emigration</th>
<th>Coverage Error</th>
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<tbody>
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<td>31</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td></td>
</tr>
<tr>
<td>Central American/Caribbean</td>
<td>6</td>
<td>Y</td>
<td></td>
<td>Y</td>
<td></td>
</tr>
<tr>
<td>Asia</td>
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<td></td>
<td>Y</td>
<td></td>
</tr>
<tr>
<td>Other Regions</td>
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<td>Y</td>
<td></td>
<td>Y</td>
<td></td>
</tr>
<tr>
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<td>Y</td>
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<td>Y</td>
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<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
</tr>
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<td>1128</td>
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<td>Y</td>
<td>Y</td>
<td>Y</td>
</tr>
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<td>Asia</td>
<td>214</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td>Other Regions</td>
<td>369</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td>Women, &lt;5 years of U.S. Residence</td>
<td>371</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td>Men, 5+ years of U.S. Residence</td>
<td>43</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td>Mexico</td>
<td>5</td>
<td>Y</td>
<td></td>
<td>Y</td>
<td></td>
</tr>
<tr>
<td>Central American/Caribbean</td>
<td>-2</td>
<td></td>
<td></td>
<td>Y</td>
<td></td>
</tr>
<tr>
<td>Other Regions</td>
<td>3</td>
<td></td>
<td></td>
<td>Y</td>
<td></td>
</tr>
<tr>
<td>Women, 5+ years of U.S. Residence</td>
<td>13</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td>Mexico</td>
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<td></td>
<td>Y</td>
<td></td>
</tr>
<tr>
<td>Central American/Caribbean</td>
<td>-1</td>
<td></td>
<td></td>
<td>Y</td>
<td></td>
</tr>
<tr>
<td>Other Regions</td>
<td>8</td>
<td>Y</td>
<td></td>
<td>Y</td>
<td></td>
</tr>
<tr>
<td>Mexican Men</td>
<td>18-29</td>
<td>29</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td>30-39</td>
<td>29</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td></td>
</tr>
<tr>
<td>40+</td>
<td>105</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
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<td>18-29</td>
<td>2</td>
<td></td>
<td>Y</td>
<td></td>
</tr>
<tr>
<td>30-39</td>
<td>11</td>
<td>Y</td>
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<td>Y</td>
<td></td>
</tr>
<tr>
<td>40+</td>
<td>34</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td></td>
</tr>
<tr>
<td>Non Mexican Men</td>
<td>18-29</td>
<td>4</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>30-39</td>
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<tr>
<td>40+</td>
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</tbody>
</table>

Demogr Res. Author manuscript; available in PMC 2014 July 02.
<table>
<thead>
<tr>
<th>Non-Mexican Women</th>
<th>% Difference</th>
<th>Sampling Error</th>
<th>Emigration</th>
<th>Coverage Error</th>
<th>Any of the 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>18.29</td>
<td>-1</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>30.39</td>
<td>3</td>
<td>Y</td>
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<td>Y</td>
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</tr>
<tr>
<td>40+</td>
<td>8</td>
<td>Y</td>
<td></td>
<td>Y</td>
<td></td>
</tr>
</tbody>
</table>

Y = yes

\(a\) assuming moderate emigration (SSA series) and no coverage error (these estimates come from Table 1, last column for the top panel; Table 2, 3\(^{rd}\) and 6\(^{th}\) columns for the middle panel; and Table 3, 4\(^{th}\) and 8\(^{th}\) columns for the bottom panel)

\(b\) ACS estimate (assuming no coverage error) falls significantly outside range of OIS estimates while varying emigration assumptions

\(c\) OIS estimate (assuming moderate emigration) falls outside range of ACS estimates while varying coverage error assumptions
November 4, 2016

John H. Thompson  
Director  
Economics and Statistics Administration  
U.S. Census Bureau  
United States Department of Commerce  
Washington, D.C. 20233-0001

Re: Legal Authority for American Community Survey Questions

Dear Mr. Thompson:

This letter supplements my letter of July 1, 2016, in which I advised that, at that time, the Department of Justice had no needs to amend the current content and uses or to request new content in the American Community Survey (ACS) for the 2020 Census. In 2014, the Department affirmed its continuing needs and legal justification for existing subjects and questions in the ACS. I understand your office recently has been in communication with Department officials regarding new uses sought by the Department relating to LGBT populations. Consistent with those communications, this letter formally requests that the Census Bureau consider a new topic in the ACS relating to LGBT populations. The attached spreadsheet accurately reflects the legal authority supporting the necessity for the collection of this information.

Please let me know if you have any questions about this letter or wish to discuss this request. I can be reached at (202) 514-3452, or at Arthur.Gary@usdoj.gov.

Sincerely yours,

Arthur E. Gary  
General Counsel

Attachment

Cc: Civil Rights Division  
Office of the Deputy Attorney General
DEPARTMENT OF JUSTICE, CIVIL RIGHTS DIVISION
REQUIREMENTS FOR AMERICAN COMMUNITY SURVEY DATA

The following statutes enforced by the Department bar discrimination on the basis of sexual orientation, gender identity, or both.

<table>
<thead>
<tr>
<th>Statutory Requirement</th>
<th>Classification</th>
<th>Uses</th>
<th>Lowest geography</th>
<th>Frequency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Violence Against Women Reauthorization Act of 2013</td>
<td>R</td>
<td>Would be used to enforce prohibitions against discrimination in programs or activities receiving financial assistance administered by the Office on Violence Against Women.</td>
<td>Place</td>
<td>Annual</td>
</tr>
<tr>
<td>Violence Against Women Act of 1994, as amended, Victims of Trafficking and Violence Protection Act of 2000, Violence Against Women and Department of Justice Reauthorization Act of 2005, Violence Against Women Reauthorization Act of 2013</td>
<td>P</td>
<td>Would be used to help administer grants, and plan education about and enforcement of prohibitions against discrimination in programs or activities receiving financial assistance administered by OVW.</td>
<td>Census block group</td>
<td>Annual</td>
</tr>
<tr>
<td>Title VII of the Civil Rights Act of 1964</td>
<td>R</td>
<td>Would be used to enforce the prohibition against unlawful employment discrimination.</td>
<td>Place</td>
<td>Annual</td>
</tr>
<tr>
<td>Title VII of the Civil Rights Act of 1964</td>
<td>P</td>
<td>Would be used to help plan education and enforcement efforts concerning the prohibition against unlawful employment discrimination.</td>
<td>Census block group</td>
<td>Annual</td>
</tr>
<tr>
<td>Title IX of the Education Amendments of 1972</td>
<td>R</td>
<td>Would be used to enforce the prohibition against unlawful discrimination in education programs and activities receiving federal financial assistance.</td>
<td>Place</td>
<td>Annual</td>
</tr>
<tr>
<td>Statutory Requirement</td>
<td>Title</td>
<td>Citations</td>
<td>Classification</td>
<td>Uses</td>
</tr>
<tr>
<td>----------------------------------------------------------</td>
<td>----------------------------------------------------------------------</td>
<td>------------------------------------</td>
<td>----------------</td>
<td>-----------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Title IX of the Education Amendments of 1972</td>
<td>Title IX of the Education Amendments of 1972</td>
<td>20 USC 1701 et seq.</td>
<td>P</td>
<td>Would be used to help plan education and enforcement efforts concerning the prohibition against unlawful discrimination in education programs and activities receiving federal financial assistance.</td>
</tr>
<tr>
<td>Fair Housing Act of 1968</td>
<td>Fair Housing Act of 1968</td>
<td>42 USC 3601 et seq.; 24 CFR 100.500; Texas Dept. of Housing and Community Affairs v. Inclusive Communities Project, Inc., 135 S. Ct. 2507 (2015).</td>
<td>R</td>
<td>Would be used to enforce the prohibition against unlawful discrimination in housing.</td>
</tr>
<tr>
<td>Fair Housing Act of 1968</td>
<td>Fair Housing Act of 1968</td>
<td>42 USC 3601 et seq.; 24 CFR 100.500.</td>
<td>P</td>
<td>Would be used to help plan education, testing and enforcement efforts to eliminate unlawful discrimination in housing.</td>
</tr>
<tr>
<td>Equal Credit Opportunity Act</td>
<td>Equal Credit Opportunity Act</td>
<td>15 USC 1691 et seq.; 12 CFR 202.6 n.2</td>
<td>R</td>
<td>Would be used to enforce the prohibition against unlawful discrimination in lending.</td>
</tr>
<tr>
<td>Equal Credit Opportunity Act</td>
<td>Equal Credit Opportunity Act</td>
<td>15 USC 1691 et seq.</td>
<td>P</td>
<td>Would be used to help plan education and enforcement efforts to eliminate unlawful discrimination in lending.</td>
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<tr>
<td>Omnibus Crime Control and Safe Streets Act of 1968</td>
<td>Omnibus Crime Control and Safe Streets Act of 1968</td>
<td>42 USC 3789d(c); 28 CFR 42.203(c), (e)</td>
<td>R</td>
<td>Would be used to enforce the prohibition against unlawful discrimination in criminal justice programs receiving federal financial assistance.</td>
</tr>
<tr>
<td>Statutory Requirement</td>
<td>Title</td>
<td>Citations</td>
<td>Classification</td>
<td>Uses</td>
</tr>
<tr>
<td>-----------------------------------------------------------</td>
<td>--------------------------------------------</td>
<td>--------------------</td>
<td>----------------</td>
<td>-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td></td>
<td>Omnibus Crime Control and Safe Streets Act of 1968</td>
<td>42 USC 3789d(c)</td>
<td>P</td>
<td>Would be used to help plan education and enforcement efforts to eliminate unlawful discrimination in criminal justice programs receiving federal financial assistance.</td>
</tr>
<tr>
<td></td>
<td>Juvenile Justice and Delinquency Prevention Act of 1974</td>
<td>42 USC 5672(b)</td>
<td>R</td>
<td>Would be used to enforce the prohibition against unlawful discrimination in juvenile justice programs receiving federal financial assistance.</td>
</tr>
<tr>
<td></td>
<td>Juvenile Justice and Delinquency Prevention Act of 1974</td>
<td>42 USC 5672(b)</td>
<td>P</td>
<td>Would be used to help plan education and enforcement efforts to eliminate unlawful discrimination in juvenile justice programs receiving federal financial assistance.</td>
</tr>
<tr>
<td></td>
<td>Civil Rights of Institutionalized Persons Act</td>
<td>42 USC 1997 et seq.</td>
<td>R</td>
<td>Would be used to enforce the prohibition against egregious or flagrant violations of law for persons residing in or confined to covered institutions.</td>
</tr>
<tr>
<td></td>
<td>Civil Rights of Institutionalized Persons Act</td>
<td>42 USC 1997 et seq.</td>
<td>P</td>
<td>Would be used to help plan education and enforcement efforts to eliminate egregious or flagrant violations of law for persons residing in or confined to covered institutions.</td>
</tr>
<tr>
<td>Statutory Requirement</td>
<td>Title</td>
<td>Citations</td>
<td>Classification</td>
<td>Uses</td>
</tr>
<tr>
<td>-----------------------------------------------</td>
<td>---------------------------------------------------------</td>
<td>-----------------</td>
<td>----------------</td>
<td>----------------------------------------------------------------------</td>
</tr>
<tr>
<td>Violent Crime Control and Law Enforcement Act of 1994</td>
<td>Violent Crime Control and Law Enforcement Act of 1994</td>
<td>42 USC 14141</td>
<td>R</td>
<td>Would be used to enforce the prohibition against patterns or practices of unlawful conduct by law enforcement or by officials in the juvenile justice system.</td>
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<tr>
<td>Violent Crime Control and Law Enforcement Act of 1994</td>
<td>Violent Crime Control and Law Enforcement Act of 1994</td>
<td>42 USC 14141</td>
<td>P</td>
<td>Would be used to help plan education and enforcement efforts to eliminate patterns or practices of unlawful conduct by law enforcement or by officials in the juvenile justice system.</td>
</tr>
<tr>
<td>Matthew Shepard and James Byrd, Jr., Hate Crimes Prevention Act of 2009</td>
<td>Matthew Shepard and James Byrd, Jr., Hate Crimes Prevention Act of 2009</td>
<td>18 USC 249</td>
<td>P</td>
<td>Would be used to help plan education and enforcement efforts to prosecute and deter covered hate crimes against LGBT individuals.</td>
</tr>
<tr>
<td>Victims of Crime Act of 1984</td>
<td>Victims of Crime Act of 1984</td>
<td>42 USC 10604(e)</td>
<td>P</td>
<td>Would be used to help plan education and enforcement efforts to eliminate unlawful discrimination in crime victim compensation programs receiving federal financial assistance.</td>
</tr>
</tbody>
</table>
INFORMATIONAL MEMORANDUM

MEMORANDUM FOR THE SECRETARY

SUBJECT: 2020 Census Updates

Audit

We are two weeks from concluding our deep dive audit of the budget, contracts, the technology, and the 2020 schedule. Findings will be gathered and put together on Friday, August 18th. We are scheduled to meet with you and present on Wednesday, August 23rd. Included in the meeting will be the audit teams and Census leadership. Today, on August 7th, the former CTO of IBM and a former Program Manager Executive also from IBM began their technical review of the IT systems and the overall Program Management. They will be present at the meeting and their findings will be included in the report to you on August 23rd. We have set up a daily evening call at 8pm to review the taskers for the final report.

Week of June 28

The Census Bureau continues to work with the team led by the Office of Acquisitions Management to ensure they have the information they need to conduct their assessment of the 2020 Census Lifecycle Cost Estimate, the CEDCaP Program, and the design of the 2020 Census. The Senate Appropriations Committee markup this week funded the 2020 Program at $24 million above the President’s request, and the House Appropriations mark, which will keep 2020 Census operations on track.

2018 End-to-End Test

We are also focused on preparing for the 2018 End-to-End Census Test. The in-field address canvassing operations set to begin on August 28, 2017 in Bluefield-Beckley-Oak Hill, West Virginia; Providence County, Rhode Island; and Pierce County Washington. Recruitment and hiring the address canvassing staff is underway in all three sites. In addition, all systems required for this operation are on schedule and undergoing final integration testing prior to going live for the test.

AT&T Challenge

On July 26, AT&T challenged the Census Bureau decision to override the automatic stay of their protest of the decennial device-as-a-service contract, which was awarded in June to CDW-G, in the U.S. Court of Federal Claims.

Depending on the ruling, work on the contract could be stopped for a matter of days or for several months. While the 2018 End-to-End Census Test could still proceed as planned under a short delay, anything longer than a few days will require the peak operations of the 2018 End-to-End Census Test to be re-planned or de-scoped to accommodate lost development time.

Week of August 4

The Census Bureau continues to make preparations for the 2018 End-to-End Census Test, which will begin later this month with the
in-field address canvassing operation. Last week’s update noted that the systems for this portion of the test are undergoing final testing. Operationally, all three Area Census Offices are now opened for the test, with the office locations in Beckley, West Virginia; Providence, Rhode Island; and Pierce, Washington. Additionally, recruitment, hiring, and onboarding of field staff for address listing continues in all three sites. The Census Field Supervisors are on board, and training began on July 31 as scheduled.

End-To-End Federal Register

Related to the 2018 End-to-End Census Test, the Department of Commerce will soon be asked to clear a draft OMB package of a 30-day Federal Register Notice seeking approval of a recalculation of the number of households requiring in-field address canvassing. The Census Bureau has worked with OMB to receive expedited approval once the package is transmitted from the Department. Timely approval will ensure the Census Bureau can work all addresses existing within the test sites.

2020 Operations

Turning to the operations of the 2020 Census itself, there are several pieces of good news:

- On July 13, the General Services Administration moved forward on the leasing process for the 40 early Area Census Offices required to support the in-field address canvassing operation for the 2020 Census.

- The Block Boundary Suggestion Project, Phase 1 of the Redistricting Data Program, is now complete, having received, processed, and fully verified over 960 submissions from states.

To update on the protest on the decennial device-as-a-service contract, as of August 2 the AT&T challenge to the Census Bureau decision to override the automatic stay of their protest in the U.S. Court of Federal Claims is still pending adjudication. If the decision is made to reverse the override, requiring work on the contract to be stopped until the final decision on the protest is made by GAO in October, there will be significant damage to the 2018 End-to-End Census Test peak operations.

Census Questions

Relating to finalizing the questions on the census form, Representative Steve King of Iowa announced on July 28 that he would introduce the “Census Accuracy Act of 2017,” which would amend the 2020 Census questionnaire to include questions on citizenship, and legal status. While citizenship is already included on the American Community Survey, the Census Bureau does not ask about legal status in any of its collections.

Additional updates on the 2020 Census Program are included in the attached chart.

HOT TOPICS (2020 Census)

Budget

Securing the resources necessary to conduct a cost effective, high quality decennial census

The Census Bureau is concluding work supporting the team led by the Office of Acquisitions Management in the conduct of their assessment of the 2020 Census Lifecycle Cost Estimate, the CEDCaP Program, and the design of the 2020 Census. The Census Bureau will fully reconcile and explain differences with the independent cost estimate prior to officially updating the 2020 Census lifecycle cost estimate this fall.

Content

Finalizing census questions for an increasingly diverse population

On July 28, Representative Steve King of Iowa announced he would introduce the “Census Accuracy Act of 2017,” which would amend the 2020 Census questionnaire to include questions on citizenship and legal status. While citizenship is already included on the American Community Survey, the Census Bureau does not ask about legal status in any of its collections.
Ensuring we are ready to fully test systems by the 2018 End-to-End Census Test

- The in-field address canvassing operation for the 2018 End-to-End Census Test is set to begin in August in Bluefield-Beckley-Oak Hill, West Virginia; Providence County, Rhode Island; and Pierce County, Washington:
  - Recruitment and hiring of the address canvassing field staff is well underway in all three sites.
  - On July 31, training of Census Field Supervisors in all three sites commenced on schedule.
  - All three Area Census Offices for the 2018 End-to-End Census Test are now opened.
- The Census Bureau has submitted to the Department of Commerce a draft OMB package of a 30-day Federal Register Notice seeking approval of a recalculation of the number of households requiring in-field address canvassing in the 2018 End-to-End Census Test. The Census Bureau has worked with OMB to receive expedited approval once the package is transmitted from the Department. Timely approval will ensure the Census Bureau can work all addresses existing within the test sites.
- A Production Readiness Review was held on July 26 for systems supporting the In-Field Address Canvassing Operation of the 2018 End-to-End Census Test. The systems received approval to move forward in Operational Readiness testing and to be deployed into the production environment.
- A Production Readiness Review was held on July 31 for systems supporting the temporary employee recruiting activities of the peak operations of the 2018 End-to-End Census Test. The systems received approval to move forward in Operational Readiness testing and to be deployed into the production environment.

### 2020 Census Operational Readiness

**Finalizing and Implementing 2020 Census Operations**

- On July 13, the General Services Administration moved forward on the leasing process for the 40 early Area Census Offices required to support the in-field address canvassing operation for the 2020 Census. The Census Bureau will be seeking approval from the Department of Commerce in the near future to proceed with the leasing of the remaining 208 Area Census Offices for the 2020 Census.
- The Block Boundary Suggestion Project, Phase 1 of the Redistricting Data Program, is now complete, having received, processed, and fully verified over 960 submissions from states. This nationwide project for the 2020 Census provided states the opportunity to submit their suggestions for the 2020 Census tabulation block inventory. In addition, states had the opportunity to submit suggested legal boundary updates as well as updates to other geographic areas. These actions allowed states to construct some of the small area geography they need for legislative redistricting.

### 2020 Census Systems Readiness

**Finalizing 2020 Census systems**

- A Systems Requirements Review was held on July 31 covering the business requirements for seven operations for the 2020 Census, which were approved to move forward into the Systems architecture design.
- A deep dive on systems readiness was presented as a part of the DOC/OMB monthly meeting on the 2020 Census on August 3.

**Major Contracts**

**Updated on key private sector partnerships**

- As of August 2, the AT&T challenge to the Census Bureau decision to override the automatic stay of their protest of the decennial device-as-a-service contract in the U.S. Court of Federal Claims is still pending adjudication. If the decision is made to reverse the override, requiring work on the contract to be stopped until the final decision on the protest is made by GAO in October, there will be significant damage to the 2018 End-to-End Census Test peak operations.

**Stakeholder Engagement**

**Providing updates on progress and challenges to key stakeholders and oversight such as GAO, OIG, and Congress**

- On July 28, the OIG issued its draft memorandum entitled “2020 Census: Evaluation of Interactive Review Address
Canvassing Operation Revealed Issues with Quality Assurance Controls". The findings and recommendations relate to concerns the OIG has about the design and implementation of the quality assurance portion of this operation, which could lead to a higher error rate by clerks than designed. The Census Bureau is reviewing these concerns and preparing formal agency comments due to OIG by August 25.

- Although DOC has not received formal letter notifications yet, GAO has indicated they likely will be launching two new audits soon:
  - A review of our scheduling methods, practices, and tools.

**Topic:** Advanced Trade release and GDP

**Issue:** Accuracy of quarterly GDP release

- On 7/27 at 8:30 the Census Bureau released Advanced International Trade and Advanced Business Inventories for June 2017. This release is significant in that these data will feed directly into the Advanced GDP release on Friday 7/28. Prior to the Census Bureau producing this release, BEA would need to estimate these statistics, often leading to significant revisions to later estimates of GDP. By Census producing these advanced release the quality of the GDP has been greatly improved.

**Topic:** Economic Census

**Issue:** 2017 Economic Census Re-planning

- Based on flat line funding in FY 2017 and similar levels anticipated in FY 2018, key aspects of the 2017 Economic Census have been re-planned. These changes will mean delays in mailings, data collection, processing and the dissemination of final data products.
- External talking point have been cleared at Census and need DOC approval so we can begin talking to stakeholders about how to best mitigate the impacts of delays and sample reductions.

**Topic:** Modernizing Economic Statistics

- Completed proof-of-concept effort with The NPD Group’s scanner data with positive results on the potential for using data to reduce respondent burden and help with non-response on the Monthly and Annual Retail Trade Survey as well as the Economic Census. Next phase of project will use additional NPD data to 1) Assess impact on MRTS estimates when NPD data is used in place of reported or imputed data 2) Create experimental 2017 Economic Census store and product level estimates for a single NAICS code that NPD has broad coverage of. Research on this project will be presented at both the 2017 American Statistical Association’s Joint Statistical Meetings and the United Nations Economic Commission for Europe’s Workshop on Statistical Data Collection.
- We are also exploring the use of this data to calculate price and quantity indexes and hope to enter into an agreement between academia, NPD (private sector), and the Census Bureau to compare different methodologies.
- Payment processor data and analysis tool has been received from Palantir. This data consists of credit card receipts from approximately 50% of all credit card transactions. We are currently assessing the quality of the data.
- The Energy Information Agency expressed an interest in the SABLE machine learning tool, developed by the Economic Directorate, and attended several demonstrations in the Census CATLab.

**Topic:** Trade Statistics Between The United States and Puerto Rico

**Issue:** Continued collection of these transactions

- Regulations require the collection of transaction information for goods shipments between the United States and Puerto Rico.
- The courier organizations and the government of Puerto Rico have requested to eliminate this requirement.
- BEA requires these statistics for the calculation of Puerto Rico GDP and the statistics are one of the few pieces of economic information available on Puerto Rico.
Meeting occurred in May 2017 with the following Puerto Rico representatives: Secretary Manuel Laboy, George Laws García – Director of Government Affairs at the Puerto Rico Federal Affairs Administration (PRFAA), Diego Sanchez Gallardo – Policy Advisor a

PRFAA, Aimee Rendón García – Special Aide to the Secretary, Edward Calvesbert (tentative) – Advisor to the Secretary. Brian Moyer, Director of BEA, also attended. All parties agreed that no alternative source for this data exists and while alternatives are developed and explored, the collection would continue.

**Topic: 2020 Census Field Infrastructure First 40 Area Census Offices (ACOs)**

- 2020 Census GSA lease procurements are subject to the Procurement Integrity Act so procurement sensitive information (e.g., the number of offers received) must be protected from disclosure;
- After the closing date, GSA will notify Census of specific projects that have not received offers or offers did not pass the pre-screening due diligence;
- Therefore, Census only knows when no offers exist for a given ACO, offering no qualitative or quantitative information for the other ACOs;
- Lack of metrics and detailed information hinder intelligent decision-making over the 3-5 month period (mid-July through October) when should be making solid decisions and identifying contingencies in high risk markets (except markets with NO offers);

**Impact:** Introduces risk that some ACOs may not be able to open on time. In constant dialogue with GSA and if this first phase ends up failing or having serious delivery issues, Census will elevate as necessary.

**Topic: Other Field Directorate Information**

**Topic: Other Field Directorate Information**

**Issue: Information Only**

- Field Division is at an inter-censal peak with the American Housing Survey (AHS) and all other ongoing surveys underway;
- There are 12,000 employees within Field Division, of which 10,000 are working in the Regions;
- AHS is ahead of schedule and will complete data collection in mid-November 2017.

**Topic: Launch of an online Content Hub**

- Targeting August 8 launch for a new landing page (we internally call the Content Hub) which includes headlines, bylines, images, graphics and videos in the style of a news website. The goal is to reach a broader audience by offering a more conversational and approachable way to showcase Census data. Multiple presentations to DOC staff (including OPA, Acting ESA Under Secretary, Chief Economist) highlighted the current in-development version of the site.

**Topic: Census Information Centers (CIC) Annual Training Conference**

- Annual Conference (August 10-11 in Atlanta, GA) for the CIC network - 52 non-profit groups (a mix of national and community-based organizations) that each have an MOA with the Census Bureau. The CICs help underserved populations access Census data. The conference will provide updates on key Census initiatives including the 2020 Census and the 2017 Economic Census.

**Topic: Civic Digital Fellowship Demo Day**

- Summer 2017 is the first year of a tech student internship program. This year, we have 14 interns as part of a Census Bureau - Harvard University collaboration. Future years will include other federal agencies, helping attract the next generation of public servants in the tech area. “Demo Day” (Tuesday, August 8, 2:30-5 HCHB ITA Conference Room) will highlight intern projects.
Metro Closure

* From August 5 through August 20, the Green Line Metro stations at Suitland (which serves the Census Bureau Headquarters building) and Branch Avenue will be closed due to maintenance work. WMATA will provide a free shuttle bus back and forth between the Naylor Road and Suitland Metro stations.
* Additionally, the Census Bureau is increasing the frequency of its shuttle to and from the Department of Commerce during the Metro station closure. Census has also built in work schedule and telework flexibilities for its employees.

Topic: 2020 Communications Plan

* The 2020 Communications Plan outlines the Census Bureau's approach to planning and executing the 2020 Census Integrated Communications Campaign which will maximize the self-response rate and then conduct outreach to those who do not respond to the census on their own. Two iterations of the plan are envisioned. Version 1.0 is undergoing clearance within the Census Bureau after receiving it from the contractor, Team Y&R. After Census Bureau review is complete, the plan will go to DOC, a briefing on the plan will be provided and DOC comments will be incorporated prior to the plan's public release. A public comment period will be held. Version 2.0 is planned for release in late summer 2018, and will address and/or incorporate all comments received, specifically from our stakeholders.
Using Administrative Records in the 2020 Census

Briefing for Secretary Ross

December 19, 2017
Historical Usage of Administrative Records

• 1890 – Creation of the frame of mortgage holders in connection with the 1890 Census
• 1939 – Acquisition of Internal Revenue Service (IRS) Form SS-4 business birth data from the Social Security Administration to append industry classification information to economic census records
• 1940 - Beginning with the 1940 Census, usage of demographic administrative records to develop separate population estimates to evaluate census coverage
  • The Census Bureau has produced intercensal estimates for the population since this era combining several sources of administrative records to obtain estimates of births, deaths, and migration
• 1970 - Enumeration of the population living in institutional quarters through personal interview using institutional records
• 1990 - Since the 1990 Census, usage of administrative records to enumerate military and federal civilian workers and their dependents serving overseas
• The use of administrative records is grounded in strong laws that guide how the Census Bureau both accesses and protects administrative records
Utilizing Administrative Records and Third-Party Data

Use information people have already provided to reduce expensive in-person follow-up.

<table>
<thead>
<tr>
<th>Improve the Quality of the Address List</th>
<th>Improve the address list</th>
<th>Validate incoming data from federal, tribal, state, and local governments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Increase Effectiveness of Advertising and Contact Strategies</td>
<td>Support the micro-targeted advertising campaign</td>
<td>Create the contact frame (e.g., email addresses and telephone numbers)</td>
</tr>
<tr>
<td>Validate Respondent Submissions</td>
<td>Validate respondent addresses for those without a Census ID and prevent fraudulent submissions</td>
<td></td>
</tr>
<tr>
<td>Reduce Field Workload for Followup Activities</td>
<td>Remove vacant and nonresponding occupied housing units from the Nonresponse Followup workload</td>
<td>Optimize the number of contact attempts</td>
</tr>
</tbody>
</table>
2020 Census Contact Strategy

#1 Initial letter

#2 Reminder letter

#3 Reminder postcard

#4 Questionnaire

#5 Not too late postcard

#6 First visit by enumerator and notice of visit

#7 Final postcard about one week after visit
Administrative Records Usage for Reducing Contacts
Identifying Vacant and Nonexistent Addresses With No Field Contacts

Can we determine if 101 Main Street is vacant or nonexistent (does not meet our definition of a housing unit)?

Example sources:
• United States Postal Service information
  • USPS Undeliverable-as-Addressed (UAA) reasons for census mailings made around April 1
  • Delivery Sequence File information
• Internal Revenue Service (IRS) 1040 filings
• IRS 1099 information returns
• Centers for Medicare and Medicaid Services Medicare Enrollment database
• Indian Health Service Patient database
• Third-party Veterans Service Group of Illinois (VSGI) files
• Census Bureau Master Address File
• ACS Area-level estimates: % vacancy, % poverty, % Hispanic, etc.
Administrative Records Usage for Reducing Contacts

Identifying Vacant and Nonexistent Addresses With No Field Contacts

Use administrative records to determine possible vacant and nonexistent address (UAA around Census Day)

Send mailing to address about 6 weeks after Census Day

Undeliverable-As-Addressed (UAA)

- Administrative record vacant
- Administrative record nonexistent address

Deliverable

- Address has opportunity to self-respond
- Address receives NRFU field visits
Administrative Records Usage for Reducing Contacts
Using Administrative Records to Enumerate NRFU Housing Units

Can we reduce the number of contacts for 101 Main Street?

1. Build a roster from most recent administrative record sources
   - Internal Revenue Service Individual Tax Returns 1040
   - Internal Revenue Service Informational Returns
   - Centers for Medicare and Medicaid Services Medicare Enrollment database
   - Indian Health Service Patient Database
   - Census Bureau Kidlink

2. Check that multiple sources indicate the family lives at an address

3. Evaluate the roster
   - How likely is it that we are counting all of the people rostered in the right place?
   - How likely is it that the household composition of the rostered family matches the Census?

4. Decision for 101 Main Street
Two examples of higher and lower confidence for 101 Main Street

Example of higher confidence:

- James and Mary Brown filed IRS 1040 taxes in April at 101 Main Street.
- James and Mary Brown received IRS 1099/W2 information at this address in January.
- Our third party file says James and Mary Brown both live at the 101 Main Street.
- We do not find James or Mary Brown at any other address on our files.
- USPS postal carriers did not indicate the second or third census mailings to 101 Main Street were undeliverable-as-addressed.
- 101 Main Street is in an area with lower mobility.

Example of lower confidence:

- Bill Smith filed IRS 1040 taxes in February at 101 Main Street.
- Our third party file indicates that Bill Smith lives at 5 Broad Street.
- 101 Main Street was undeliverable-as-addressed for the second mailing in March.
- 101 Main Street is in an area with higher vacancy and mobility.
Administrative Records Usage

Administrative Record Enumeration and Characteristic Imputation

Can we reduce the number of contacts for 101 Main Street?

Administrative Records Source Possibilities

Age and Sex

• Past Census Bureau responses to 2010 Census and previous American Community Surveys
• Social Security Administration (SSA) Numeric Identification File (Numident)

Race and Hispanic Origin

• Past Census Bureau responses
• Country of origin from SSA Numident
• State program participation data
• Census Bureau Best Race and Hispanic Origin from federal sources

Relationship to Householder

• Census Bureau Kidlink file

Tenure

• Housing and Urban Development program participation
• Tax and Deed Information
The federal Office of Child Support Enforcement (OCSE) operates the National Directory of New Hires (NDNH), a database established by the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA) for the purposes of assisting state child support agencies in locating parents and enforcing child support orders. In addition, Congress authorized specific state and federal agencies to receive information from the NDNH for authorized purposes.

Three Files
- New Hires File: Contains new employee name, social security number and address information
- Unemployment Insurance File: contains claimant name, social security number and address information for individuals who received or applied for benefits
- Wage File: contains for each employee information on wage information and who their employer is

Possible usages for the 2020 Census of the New Hires file and the Unemployment Insurance files
- Provide an additional source when building rosters from administrative record sources for Nonresponse Followup eligible addresses
- Provide a second source of corroborating information that a family found on administrative record sources lives at an address
- Possible usage of Unemployment Insurance File to identify addresses to receive full contact strategy

Usages to other programs at the Census Bureau including the Longitudinal Employer Household Dynamics Program
2020 Census Update

January 18, 2018

James B. Treat, Assistant Director
Decennial Census Programs for Program, Operations, and Schedule Management
Agenda

- Performance Management Approach
- Status Reporting
- Background – Risk Management Process
Performance Management Approach
Performance Management Update

The 2020 Census is comprised of

- **35 Operations** (24 are in-scope for the 2018 End-to-End Census Test)
- **52 Systems** (44 are in-scope for the 2018 End-to-End Census Test)
- **Over 25,000 activities with over 42,000 dependencies**

Regular Monthly Reporting in 8 Areas

and

Periodic Reporting in 22 Areas
Performance Management Update
Regular Monthly Reporting in 8 Areas

• Hot Topics – Albert E. Fontenot, Jr.
• Cyber Security – Kevin Smith
• Systems Readiness – Atri Kalluri
• Critical Path – James B. Treat
• Major Contracts – Luis J. Cano
• Budget – Joanne Buenzli Crane
• Stakeholders and Oversight – Albert E. Fontenot, Jr.
• Risks – James B. Treat
Performance Management Update
Periodic Performance Management Reporting in 22 Areas

- Area Census Office Lease Status – Slide 30
- Local Update of Census Addresses (LUCA) – Slide 31
- PEGA Productivity and Progress Report
- 2018 Systems ATO Risk Report
- Regional Census Center Build-out
- Data Capture Center Lease/Build-out
- Recruiting Data
- Address Canvassing
- Printing
- Self-Response Rates
- Call Center Lease/Build-out
- Census Questionnaire Assistance
- Update Leave
- Nonresponse Followup

- Group Quarters Operations
- Remote Alaska & Update Enumerate
- Data Capture Activities
- Post-Data Collection Processing
- P.L. 94-171 Data and Geographic Products
- Post Enumeration Survey Operations
- OMB Clearance Activities
- Scalability & Performance Testing
Status Reporting

Regular Monthly Reporting
2020 Census

Hot Topics for DOC Awareness: Week of January 15, 2018

Changes to the Race/Ethnicity Question

• The Census Bureau has begun to implement separate questions for race and ethnicity without the Middle Eastern North African (MENA) minimum reporting category for both the 2018 End-to-End Census Test and the 2020 Census.
• The Census Bureau’s Decision Memo and supporting communications materials will be finalized by January 19. We expect press inquires and letters from Congress and stakeholders on this issue.
• By law, the actual question wording that will appear on the 2020 Census questionnaire must be submitted to Congress by March 31.

Residence Criteria

• The Residence Criteria FRN is moving through clearance at the Department. It must be cleared by January 19 in order to publish it before the 2020 Census Program Management Review (PMR) on January 26. The Census Bureau’s Decision Memo and supporting communications materials will be finalized by January 19.

Citizenship

• The Census Bureau is evaluating a request from the U.S. Department of Justice on adding a question about citizenship status and has a well-established process for considering requests for new question to the Decennial Census and the American Community Survey.
• Communications materials and a standard response to the letters we are getting from Congress will be finalized by January 19.
• The Census Bureau has received 2 FOIAs on this issue.

2020 Census Program Management Review

• The Census Bureau will hold its next 2020 Census Program Management Review on Friday, January 26, 2018 at 1:00 PM, in the Census Bureau’s Auditorium. The C-SHaRPS system will be demonstrated at 12:00 pm.

2020 Census Life Cycle Cost Estimate (LCCE)

• In support of the 2020 Census LCCE, the Executive Summary of the underlying Basis of Estimate, which has cleared OMB review, will be transmitted to Congress imminently.
• After receiving the Basis of Estimate and its related suite of documentation of the LCCE, GAO resumed its engagement on the cost estimation on January 9.

USPS and Census Bureau Pilot for the 2018 End-to-End Census Test

• While finalizing the Interagency Agreement for the Postal Carriers as Enumerators Pilot, attorneys from the USPS and Commerce Department identified conflicts of law between Titles 18 and 39 (USPS authority) and Title 13 (Census Bureau authority).
• All other USPS Partnership work remains on schedule.

Recruiting for the 2018 End-to-End Census Test

• As of January 16, we have 1,717 qualified candidates. Our goal for entering training is 1,166 employees so that we can have approximately 1,049 trained employees entering the Nonresponse Followup operation.
• The Census Bureau will continue to aggressively recruit candidates and remain concerned about recruiting for the 2020 Census.

National Partnership

• The Census Bureau is building the infrastructure to establish contacts with corporations and national partners.

Census Scientific Advisory Committee (CSAC) and National Advisory Committee on Racial, Ethnic and Other Populations (NAC)

• Refreshing charters for both committees – currently routing renewed charters through DOC for signature as the current charters are set to expire in March: CSAC expires March 17 and NAC expires March 24.
• Meetings are scheduled for both committees this spring.
• Refreshing team members for CSAC – an executive selection panel will convene to fill nine current and upcoming member vacancies on January 24.
2020 Census

CyberSecurity – Summary

The Census Cybersecurity effort is to resolve these risks:

**External Risks**
- Compromising User Devices (Public)
- Compromising External Network Access
- Impersonating the Census
- Inserting Invalid Responses

**Internal Risks**
- Disrupting the Internet Self Service Website
- Data Breaches
- Compromising User Devices (Census)

The Census bureau are taking actions to mitigate these risks through coordination with Federal partners by:

**Creating a Scalable Secure Network for 2020 Census Respondents:**
*Working with OMB, DHS, and Cloud Provider to develop scalable and secure network connection in the cloud.*
- Federal Working Group with Cloud Provider (OMB, DHS, Cloud Provider, Network Providers)
- Current Solution is Network Provider Based
- Future Solution will be Cloud Provider Based (working towards using during FY18 Test):

**Strengthening Our Incident Response Capabilities (DHS FIRE):**
*Advance ability to continually Identify, Protect, Detect, Respond, and Recover from possible cyber threats.*
- Building from DHS assessment that “Census is well positioned to Respond to Incidents”
- Moving forward with creating Insider Threat capability plan with outside expertise
- Improving visibility of cybersecurity issues by implementing tools from private industry and federal government

**Improving Our Cybersecurity Posture:**
*Improve knowledge, processes, procedures, and/or technology.*
- Increasing knowledge resources
  - Collaboration with NIST cybersecurity Center of Excellence for recommended practices
  - Regular Cybersecurity briefings with Department of Homeland Security (DHS)
  - Develop approach across federal intelligence community to engage and utilize their resources during cyber threat response
- Testing Technology
  - Publically facing Internet Self Response system security tested for 2nd time by Private Industry; Federal Government (DHS) test in Feb ‘18

The Census Bureau is working on a scalable secure network and improving their ability to actively see, secure, and resolve cybersecurity risks for the 2020 Census.
2020 Census
Cybersecurity - Authority to Operate (ATO) Status

2018 End to End Test – 44 Systems

No Level of Effort (54%) (Green)
• 52% have obtained ATOs (done)
• 2% (1 system) does not require an ATO (NA)

Small Level of Effort (37%) (Grey)
• 30% have ATOs and are moving to 2020 Infrastructure. These systems are moving from servers in the Census data center to the technical integrator
• 7% have ATOs and are being modified. These systems are already housed in the infrastructure and are developing additional capabilities.

High Level of Effort (9%) (Blue)
• 9% are new; Getting ATO before FY18 Test

2020 Census – 52 Systems

No Level of Effort (88%) (Green)
• 86% will have obtained ATOs from the FY18 End to End Test (done)
  • These systems will be maintained annually
• 2% (1 system) does not require an ATO (NA)

High Level of Effort (TBD) (Blue)
• 12% are new;
  • Post Enumeration Survey
  • Customer Relationship Management and Experience
  • Decennial Device as a Service

The Authority to Operate (ATO) process is quality control for Cybersecurity done for all systems to continually reduce information technology security risks to an acceptable level.
See attached, full-size handout (provided at briefing).
2020 Census

Critical Path Report

THIS IS A PROTOTYPE – The report goes live in February.

### 2020 Census Critical Path Report

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1/17/2018 12
2020 Census
Major Contracts

*Census Schedule A Human Resources and Recruiting, Payroll System (C-SHaRPS) - Recruiting & Assessment (R&A)
Awarded: November 10, 2016
Awardee: CSRA
Life Cycle Cost Estimate: $125.0M
Total obligated as of December 2017: $7.4M
FY2018 obligations/commitments as of December 2017: $0.6M
Contractor met with Secretary: December 12, 2017
• Contract in production supporting recruitment and assessment for the 2018 End-to-End Census Test peak operations.
• Contractor continues to resolve any defects encountered during the 2018 End-to-End Census Test.

• Please Note: The Census Bureau has confirmed with the CSRA Contractor that the 2020 R&A scalable requirement was and is understood.

Census Schedule A Human Resources and Recruiting, Payroll System (C-SHaRPS) – Fingerprinting
Awarded: November 21, 2017
Awardee: IndraSoft, Inc
Life Cycle Cost Estimate: $94.3M
Total obligated as of December 2017: $3.7M
FY2018 obligations/commitments as of December 2017: $3.7M
• Gunnison Consulting Group filed a protest on December 1.
• Protest resolved and IndraSoft Inc. resumed performance on December 23.
• C-SHaRPS worked with IndraSoft to determine the scope of work feasible for the 2018 End-to-End Census Test given the late award from the Supply Chain Risk Assessment and protest.
• Note: Key fingerprinting dates
  • Census Field Supervisors: February 7 – February 26, 2018
  • Enumerators: February 20 – March 18, 2018
• Fingerprint plan for the 2018 End-to-End Census Test:
  • IndraSoft solution will not be used to support the background clearance process for the Census Field Supervisors. Current Census Bureau fingerprint process will be used for the supervisors.
  • The plan is to use a hybrid approach to fingerprint enumerators for peak operations using IndraSoft processes and Census Bureau equipment/sites.

*Contractor met with Secretary
2020 Census
Major Contracts

Integrated Communications Contract
Awarded: August 24, 2016
Awardee: Young & Rubicam (Y&R)
Life Cycle Cost Estimate: $520.0M
Total obligated as of December 2017: $17.9M
FY2018 obligations/commitments as of December 2017: $17.2M
OMB approved the 2020 Census Barriers, Attitudes, and Motivators Survey (CBAMS).

*Census Questionnaire Assistance (CQA)
Awarded: July 11, 2016
Awardee: General Dynamics Information Technology (GDIT)
Life Cycle Cost Estimate: $681.4M
Total obligated as of December 2017: $73.1M
FY2018 obligations/commitments as of December 2017: $30.2M
Contractor met with Secretary: October 26, 2017
• CQA achieved ATO for all systems and facilities on January 11.
• Continue Contractor recruitment at both call centers (Jacksonville, FL and Sandy, UT) focusing on customer service representatives to meet staffing needs for the 2018 End-to-End Census Test.

2020 Census Printing and Mailing
Awarded: October 16, 2017
Awardee: Cenveo
Life Cycle Cost Estimate: $142.6M
Total obligated as of December 2017: $73.1M
FY2018 obligations/commitments as of December 2017: $9.0M
• 2018 End-to-End Census Test print orders issued.
• Obtain security authorization for Print Vendor’s solution by February 11.

*Decennial Device as a Service (dDaaS)
Awarded: June 29, 2017
Awardee: Computer Discount Warehouse – Government (CDW-G)
Life Cycle Cost Estimate: $423.2M
Total obligated as of December 2017: $8.5M
FY2018 obligations/commitments as of December 2017: $9.0M
Contractor met with Secretary: December 18, 2017
• CDW-G prepared to provide the devices for the 2018 End-to-End Census Test Nonresponse Followup operation.

*Contractor met with Secretary
2020 Census
Major Contracts

*2020 Enterprise Census and Survey Enabling (ECaSE) Platform
Awarded: June 19, 2017
Awardee: immixGroup, Inc.
Life Cycle Cost Estimate: $167.3M
Total obligated as of December 2017: $46.5M
FY2018 obligations/commitments as of December 2017: $13.2M
Contractor met with Secretary: October 26, 2017
• Delivered Nonresponse Followup and Update Leave functionality for integration testing by the TI for the 2018 End-to-End Census Test. This included the enumeration application, the Field OCS and the Survey OCS.
• Identified performance measures to track productivity and cost and corrective actions needed to address cost growth issue.

Field IT Deployment (FITd)
Awarded: TBD
Awardee: TBD
Life Cycle Cost Estimate: $422.7M
Total obligations/commitments as of December 2017: $0
FY2018 obligated as of December 2017: $0
• Request for Proposal (RFP) released January 11.

*Technical Integrator (TI)
Awarded: August 26, 2016
Awardee: T-Rex Solutions, LLC
Life Cycle Cost Estimate: $1,278.1M
Total obligated as of December 2017: $228.6M
FY2018 obligations/commitments as of December 2017: $41.6M
Contractor met with Secretary: October 26, 2017
• Obtain ATO for Release C 2020 On-Premise environment by January 19.
• TI continues integration and testing for Releases C and D.

*Contractor met with Secretary
The 2020 Census Program has committed or obligated nearly 30 percent of the total plan of $987 million in the first quarter. However, there is a 19 percent variance against planned spending.

The variance of $42.3 million in 2020 Census operations is made up of $10.1 million in salary lapse and $32.2 million in contracts and other objects mostly due to delays.

The variance in 2020 Census IT systems and operations is $19.7 million is made up of $0.9 million in salary lapse and $18.8 million in contract delays.

The $6.6 million variance in CEDCaP is made up of $1.2 million in salary lapse and $5.4 million in contracts.
Major Contracts Spend Plan, Obligations, & Commitments
As of December 31, 2017

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## Major Contracts Spend Plan, Obligations, & Commitments
### As of December 31, 2017 (Continued)

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<th>(Millions)</th>
<th>Oct</th>
<th>Nov</th>
<th>Dec</th>
<th>Jan</th>
<th>Feb</th>
<th>Mar</th>
<th>Apr</th>
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<th>Jul</th>
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<td><strong>CSRA - C-SHARPS</strong></td>
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<tr>
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</tr>
</tbody>
</table>

---

**CDWG - Device as a Service**

- **Spend Plan**
  - October: $0.0
  - November: $2.2
  - December: $2.4
  - January: $2.6
  - February: $2.8
  - March: $3.0
  - April: $3.2
  - May: $3.4
  - June: $5.4
  - July: $5.6
  - August: $5.8
  - September: $5.9

- **Obligations/Commitments**
  - October: $0.0
  - November: $0.7
  - December: $0.9

- **Variance**
  - October: $0.0
  - November: $1.5
  - December: $1.5

---

**CSRA - C-SHARPS**

- **Spend Plan**
  - October: $0.0
  - November: $0.5
  - December: $0.6
  - January: $3.3
  - February: $3.3
  - March: $3.3
  - April: $3.3
  - May: $3.3
  - June: $3.3
  - July: $3.3
  - August: $3.3
  - September: $3.3

- **Obligations/Commitments**
  - October: $0.0
  - November: $0.5
  - December: $0.6

- **Variance**
  - October: $0.0
  - November: $0.0
  - December: $0.0

---

**Indrasoft - Fingerprinting**

- **Spend Plan**
  - October: $0.0
  - November: $3.7
  - December: $3.7
  - January: $5.1
  - February: $5.1
  - March: $6.5
  - April: $6.5
  - May: $6.5
  - June: $16.0
  - July: $16.0
  - August: $16.0
  - September: $16.0

- **Obligations/Commitments**
  - October: $0.0
  - November: $3.7
  - December: $3.7

- **Variance**
  - October: $0.0
  - November: $0.0
  - December: $0.0
# Budget Impacts for 2020 Census Risks
## As of January 2018

<table>
<thead>
<tr>
<th>Risk Trigger</th>
<th>2020 Census Risk</th>
<th>Status</th>
<th>Budget Year Impacted</th>
<th>Cost Impact of the Risk Trigger</th>
<th>Trend</th>
</tr>
</thead>
<tbody>
<tr>
<td>Corrective Action for the protest for the Fingerprinting Contract</td>
<td>Acquisition Lead Time (IF 2020 Census design decision milestones do not allow the requisite lead times for acquisition processes and reviews, THEN the Census Bureau may not be able procure the necessary products and services in sufficient time to align with the 2020 Census Life Cycle.)</td>
<td>The supply chain risk was reassessed and the results reviewed by OGC. The protesting vendor was briefed on the revised supply chain risk assessment. The protesting vendor withdrew their protest. Work has resumed with the vendor who was awarded the contract, Indrasoft. Components of their solution will be used in the 2018 End-to-End Census Test.</td>
<td>Life Cycle</td>
<td>Vendor 2 was awarded the contract with a Life Cycle estimate of $94 million. The 2020 Census Life Cycle Cost Estimate (LCCE) included $146 million for fingerprint.</td>
<td>LCCE impact: adds $52 million to contingency associated with clearance of employees</td>
</tr>
</tbody>
</table>
## Budget Impacts for 2020 Census Risks
### As of January 2018 (Continued)

<table>
<thead>
<tr>
<th>Risk Trigger</th>
<th>2020 Census Risk</th>
<th>Status</th>
<th>Budget Year Impacted</th>
<th>Cost Impact of the Risk Trigger</th>
<th>Trend</th>
</tr>
</thead>
<tbody>
<tr>
<td>Allocation to Integrated Communications Contract (Young &amp; Rubicam [Y&amp;R])</td>
<td>Funding Requests Not Realized (IF the funding appropriated during each fiscal year of the 2020 Census life cycle is less than requested, THEN the ability to implement the critical systems and operations supporting the 2020 Census will be adversely affected.)</td>
<td>The vendor for our Integrated Communications contract, Y&amp;R, has elevated concerns associated with funding availability for advance planning in FY 2018. The is no contingency funding in FY 2018. The Census Bureau is working to identify options to fund this advance planning work and minimize risk if the funding cannot be provided until FY 2019. Updates on mitigation were provided in January.</td>
<td>FY 2018</td>
<td>$5.3 million - $14.5 million</td>
<td>Impact to the LCCE: $0 There is funding available for these activities in FY 2019.</td>
</tr>
<tr>
<td>LCCE: $520 million</td>
<td></td>
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</table>
### Budget Impacts for 2020 Census Risks as of January 2018

<table>
<thead>
<tr>
<th>Risk Trigger</th>
<th>2020 Census Risk</th>
<th>Status</th>
<th>Budget Year Impacted</th>
<th>Cost Impact of the Risk Trigger</th>
<th>Trend</th>
</tr>
</thead>
<tbody>
<tr>
<td>Evaluation of CEDCaP – ECaSE (Pega Systems) Backlog</td>
<td>Funding Requests Not Realized (IF the funding appropriated during each fiscal year of the 2020 Census life cycle is less than requested, THEN the ability to implement the critical systems and operations supporting the 2020 Census will be adversely affected.)</td>
<td>The CEDCaP program manager has identified sources of funds in other CEDCaP projects to cover more than $6 million of the $11 million projected shortfall in ECaSE for FY 2018. The remaining shortfall will be covered with a combination of contractor efficiencies and development team reductions. Requirements were further reduced at the end of December. A new projected cost is pending, but is anticipated to lower the cost risk. Updates on mitigation were provided in January.</td>
<td>Life Cycle</td>
<td>LCCE: $965 million</td>
<td>Impact to the LCCE current risk analysis projection could add: $100 million</td>
</tr>
</tbody>
</table>
## Budget Impacts for 2020 Census Risks As of January 2018 (Continued)

<table>
<thead>
<tr>
<th>Risk Trigger</th>
<th>2020 Census Risk</th>
<th>Status</th>
<th>Budget Year Impacted</th>
<th>Cost Impact of the Risk Trigger</th>
<th>Trend</th>
</tr>
</thead>
<tbody>
<tr>
<td>Separate Race and Ethnicity Questions</td>
<td>Late Design Change (IF late in the decade either external factors or policies prevent the Census Bureau from implementing the integrated design as planned, THEN the Census Bureau will have to change the design which will increase the cost or reduce the quality of the 2020 Census.)</td>
<td>The Census Bureau made operations and systems modifications to accommodate OMB’s decision to maintain the current race and ethnicity standard. There were manageable impacts to budget, schedule (systems integration testing), and risk.</td>
<td>FY 2018</td>
<td>FY 2018: $1.5 million (covered by salary lapse)</td>
<td>Impact to the LCCE: none</td>
</tr>
</tbody>
</table>
2020 Census

Stakeholders and Oversight

GAO
The next quarterly meeting with GAO to discuss the open recommendations, strategies, and priorities will be on January 30.

- **Life Cycle Cost Estimate (LCCE) Audit**
  - The LCCE audit resumed with an entrance conference on January 10, where GAO met with the Chief Financial Officer and the Decennial Census Programs Budget Team.
  - Their questions and topics of interest are based on their examining of the revised Basis of Estimation documentation submitted to them on December 11.

- **Systems Audit**
  - The GAO systems audit continues.
  - There is no feedback from GAO at this time.

- **Plans for Hard-to-Count Populations Audit**
  - GAO is beginning this work pursuant to its authority under 31 U.S.C. 717 after receiving a request from the House Committee on Oversight and Government Reform.
  - The entrance meeting with GAO was held on December 6.
  - Research Questions and Scope:
    - What socio-demographic groups are considered “hard to count” and why?
    - What is the status of the Census Bureau’s efforts to enumerate the “hard to count” in 2020?
    - To what extent is the Bureau’s current plans for enumerating the “hard to count” in 2020 addressing the nation’s changing demographics and key design changes introduced for the 2020 Census; and leveraging earlier lessons learned (e.g., prior recommendations from GAO, NAS, DOC advisory committees, the Bureau’s own evaluations and experiments, and others)?
  - GAO is conducting meetings with various Census Bureau experts and documents are being provided to GAO, as requested.

OIG

- **Background Check Audit**
  - The Census Bureau received the OIG Background Check draft report on December 18.
  - These are the tentative findings, which OIG discussed during an exit conference:
    - Escalating costs and inadequate quality assurance practices pose risks to 2020 Census background check activities.
    - The Census Bureau is not adequately monitoring contractor activities.
    - Program officials are not always allocating background check costs to the correct fund.
  - The Census Bureau is developing a response and will provide comments by late January.

- **Area Census Office (ACO) Locations Audit**
  - The Census Bureau held an informal exit meeting for the OIG audit on ACO locations and expects to receive a draft report by late January/early February.
  - The audit included a close look at the delineation criteria and model, as well as the Life Cycle Cost Estimate associated with field infrastructure innovation.

Congress

- The Census Bureau resumed the quarterly briefings with the Appropriations Staff (House and Senate Minority and Majority). The latest briefing was held on December 8.
- The Census Bureau briefed Senate staff on December 29 (about 50% of the Senate staff attended).
## 2020 Census
### GAO Recommendations

<table>
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<tr>
<th>Topics</th>
<th>Total Recs</th>
<th>Closed Recs</th>
<th>Open Recs</th>
<th>Recs with Action Plan Due Date in Future</th>
<th>Documents Submitted: Awaiting GAO Decision to Close</th>
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<td>Life Cycle Cost Estimate</td>
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## 2020 Census
### OIG Recommendations

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2020 Census
Risk & Issue Management – Structure

The risk and issue management process is conducted at all levels of the 2020 Census Portfolio.
The selected risks that follow represent the major concerns that could affect the design or the successful implementation of the 2020 Census.

- Public Perception of ability to Safeguard Response Data (Probability 3, Impact 5) **RED**
- Cybersecurity Incidents (Probability 3, Impact 5) **RED**

Yellow risks with Probability and Impact equal to or great than 3, see background slides
2020 Census
Program Risk & Issue Management – Summary of Risks

There are currently 245 open program/operations risks in the 2020 Census Portfolio. These program risk registers contain risks pertaining to the project and sub-projects covered by the program. Some of the common concerns covered by these risks include:

- System and Application Development/Readiness
- Hiring and Staffing Problems
- Funding
- Contracts and Acquisition
- Scope Changes

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<tr>
<th>Quadrant</th>
<th>Total Risks</th>
<th>%</th>
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<td>YELLOW</td>
<td>96</td>
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<td>GREEN</td>
<td>101</td>
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<table>
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<tr>
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000363
1/17/2018 28
Status Reporting

Periodic Reporting
Wave 1
Area Census Office Lease Status

Status:
- On Track

Data current as of:
January 11, 2018

Completion Date:
March 31, 2018

Wave 1 Area Census Office (ACO) Lease Status

- ACO Space Not Identified: 9
- ACO Space Identified (Pending Lease Award/Occupancy Agreement [OA]): 23
- Lease Award/OA Signed: 8

Source: Weekly Field Division Report, January 11, 2018

1. Bronx South, NY
2. Caguas, PR
3. Concord, NY
4. Denver, CO
5. Houston West, TX
6. Miami North, FL
7. Oakland, CA
8. Raleigh, NC
9. San Antonio East, TX
Periodic Performance Management Reports
Local Update of Census Addresses

Executive Report | Week of January 15, 2018

2020 Local Update of Census Addresses (LUCA)

Status:
- On Track

Data current as of:
January 12, 2018

Completion Date:
January 31, 2018

Notes:
- Extended the registration deadline for natural disaster areas until January 31, 2018
- 42 states are registered to participate, up from 28 states in 2010 LUCA

10,994 Governments Registered or In-Process to Register

<table>
<thead>
<tr>
<th>Status</th>
<th>Count (Percentage)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Registered and Participating</td>
<td>10,536 (26.8%)</td>
</tr>
<tr>
<td>Incomplete Registration</td>
<td>458 (1.2%)</td>
</tr>
<tr>
<td>Not Participating</td>
<td>28,325 (72.0%)</td>
</tr>
</tbody>
</table>

Coverage Measures
- 96.4% Of the population covered
- 96.2% Of the housing covered

Source: Daily LUCA E-mailed Report, January 12, 2018
Background – 2020 Census Risk Management Process
2020 Census Portfolio Management Structure

The 2020 Census Portfolio is comprised of 35 Operations/Programs.

Each Operation/Program includes a number of projects. For example the SE&I Program includes CEDCaP, 2020 Developed and Enterprise Enabling Systems. These systems are supported by IT development and integration contracts.
2020 Census
Risk & Issue Management – Process

Portfolio risks are defined as risks that span the 2020 Census life cycle and could jeopardize achieving the 2020 Census goals and objectives. The broadly defined portfolio risks represent threats to the success of the portfolio rather than to individual programs or projects.

• Have the potential to be realized more than once during the life cycle.
• Span several years with many potential risk events over that period. Thus, these risks remain open on the 2020 Census Portfolio risk register until the latest possible date the risk event could occur.
• May elevate from the program, project and sub-project level because of the potential to impact portfolio goals.
• Risks at this level can spin-off multiple issues, however the risk may remain if it still has the potential to occur again.
The 2020 Census Risk Review Board (RRB) is the overall governing body presiding over the 2020 Census Portfolio, program and project level risk and issue management processes. All processes follow industry best practices and are in alignment with the Enterprise Office of Risk Management and Program Evaluation (ORMPE) Risk Review Board (RRB) includes representatives across all programs.

Responsibilities include:

• Regular review and update of the portfolio risk register and issue register.
• Regular review of program risk registers and issue registers.
• Regular review of system development and major contracts project risk registers and issue registers.
• Escalation of risks and issues to the Enterprise Risk Review Board as appropriate.
2020 Census
Risk & Issue Management – Reporting

Dasher Report

- Monthly report to ORMPE, Associate Director for Decennial Census Programs, Director, Deputy Director, Department of Commerce
- Top Risks (Red and Yellow), Portfolio Risk Inventory, Mitigation Treatment Plans

Monthly Status Report (MSR)

- Monthly
- Table of all risks, Risk Matrix, and list of updates

E300

- Monthly delivery to the Department of Commerce and OMB
- Portfolio Risk Register, full information on all Red risks, and a Quad Chart with Top Risks and Top Issue

2020 PMGB

- Quarterly review of Red risks, as well as issues. Escalated risks brought to PMGB as necessary.
- Top Risks (Red and Yellow)
Program risks and issues are defined as risks that could jeopardize the success of an individual program/operation. They relate to achieving program-specific objectives and specifically address potential impacts to program elements: cost, schedule, technical, customer expectations, and public trust.

Program/operations own and manage these risks and issues. Each of the 35 operations supporting the 2020 Census, plus each census test, has their own risk register and issue log.

Program risks and issues, which have potential to impact portfolio goals and objectives, may be identified for escalation to the portfolio level for increased visibility and analysis.

The Risk & Issue Management Process at the program and project levels is nearly identical to the process at the portfolio level, but governed and managed within the program or project. The Portfolio Level Risk and Issue Process Manager regularly reviews for quality and completeness.
## 2020 Census
### Program Risk & Issue Management – Red Risks

<table>
<thead>
<tr>
<th>Risk ID</th>
<th>Title</th>
<th>Description</th>
<th>Exposure Level and Color</th>
<th>Probability</th>
<th>Impact</th>
<th>Mitigation Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td>LC-039</td>
<td>Public Perception of Ability to Safeguard Response Data</td>
<td>The accuracy and usefulness of the data collected for the 2020 Census are dependent upon the ability to obtain information from the public, which is influenced partly by the public’s perception of how well their privacy and confidentiality concerns are being addressed. The public's perception of the Census Bureau’s ability to safeguard their response data may be affected by security breaches or the mishandling of data at other government agencies or in the private sector. If a substantial segment of the public is not convinced that the Census Bureau can safeguard their response data against data breaches and unauthorized use, then response rates may be lower than projected, leading to an increase in cases for follow-up and cost increases.</td>
<td>High - Red</td>
<td>3</td>
<td>5</td>
<td>1. Develop a strategy to build and maintain the public’s confidence in the Census Bureau’s ability to keep their data safe. (Ongoing) 2. Research other Census Bureau divisions, other government agencies, other countries, and the public sector to gain insight into how they have effectively mitigated the issue of public trust and IT security. (Ongoing) 3. Continually monitor the public’s confidence in data security in order to gauge their probable acceptance of the Census Bureau’s methods for enumeration. (Ongoing)</td>
</tr>
<tr>
<td>LC-041</td>
<td>Cybersecurity Incidents</td>
<td>Cybersecurity incidents (e.g., breach, denial of service attack) could happen to the Census Bureau’s authorized IT systems, such as the Internet self-response instrument, mobile devices used for fieldwork, and data processing and storage systems. IT security controls will be put in place to protect the confidentiality, integrity, and availability of the IT systems and data. If a cybersecurity incident occurs to the systems supporting the 2020 Census, then additional technological efforts will be required to repair or replace the systems affected in order to maintain secure services and data.</td>
<td>High - Red</td>
<td>3</td>
<td>5</td>
<td>1. Monitor system development efforts to ensure the proper Census Bureau IT security guidelines are followed during the system development phase. (Ongoing) 2. Research other Census Bureau programs, other government agencies, other countries, and the private sector to understand how they effectively mitigate cybersecurity incidents. (Ongoing) 3. Audit systems and check logs to help in detecting and tracing an outside infiltration. (Ongoing) 4. Perform threat and vulnerability analysis through testing. (Ongoing) 5. Prepare for rapid response to address any detected cybersecurity incidents. (Ongoing)</td>
</tr>
</tbody>
</table>
## 2020 Census
### Program Risk & Issue Management – Medium-Yellow Risks

<table>
<thead>
<tr>
<th>Risk ID</th>
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</tr>
</thead>
<tbody>
<tr>
<td>LC-045</td>
<td>Major Disasters</td>
<td>Major disasters (e.g., earthquake, flood, tornado, epidemic, and terrorist attack) can affect the populations of a geographic area (e.g., town, county, state) and prevent people from self-responding to the 2020 Census or being contacted by field staff. Major disasters can disrupt operations at key facilities (e.g., Headquarters, National Processing Center, Regional Census Centers, and Area Census Offices) and supporting infrastructure (e.g., Post Offices and telecommunications). IF a major disaster occurs during the final preparations for or the implementation of the 2020 Census (October 2017 – September 2023), THEN operations may not be able to be executed as planned, leading to increased costs, schedule delays, and lower quality data.</td>
<td>Medium - Yellow</td>
<td>4</td>
<td>3</td>
<td>1. Plan for a rapid response team to access the disaster and recommend a course of action to senior managers. (Ongoing) 2. Where feasible, the Census Bureau will develop secondary operations facilities, implement regular backup of automated systems and data, and provide uninterruptible power. (Ongoing) 3. Develop Continuity of Operations (COOP) plans for all key facilities (HQ, NPC, RCCs, ACOs, etc.). (Ongoing) 4. Develop Continuity of Operations (COOP) plans for all operations. (Ongoing) 5. Ensure there is contingency funding in the budget to cover Continuity of Operations (COOP) plans. (Ongoing) 6. Consult with other government agencies on best ways to continue operations in areas affected by a major disaster. (Ongoing)</td>
</tr>
<tr>
<td>LC-010</td>
<td>Enterprise IT Solutions</td>
<td>The Census Bureau, wherever feasible, will leverage cross-program IT solutions and has begun the work necessary to ensure this is achieved. However, enterprise solutions (i.e., CEDCaP, CEDSCI, and C-SHaRPS) may not address all of the 2020 Census Program requirements. In these cases, impacts must be identified and proper actions taken to resolve the situation. IF enterprise IT solutions cannot meet the 2020 Census Program requirements, THEN existing systems may require substantial modifications or entirely new systems may have to be developed, adding complexity and increasing risk for a timely and successful 2020 Census.</td>
<td>Medium - Yellow</td>
<td>3</td>
<td>4</td>
<td>1. Engage with enterprise efforts to ensure that solutions architectures align and provide continued support for 2020 Census requirements development and management. (Ongoing) 2. Participate in agency-wide solution development (i.e., avoid custom solutions where enterprise or off-the-shelf solutions will suffice) and ensure that contingencies (i.e., off-ramps) are developed early and exercised when necessary. (Ongoing) 3. Determine the extent existing systems from the 2010 Census can be modified and reused if necessary. (Complete) 4. Design IT solutions that are flexible enough to incorporate design changes. (Ongoing) 5. Establish a change control management process to assess impacts of change requests to facilitate decision-making. (Complete) 6. Prepare for rapid response to implement change based on the results of the change control process. (Ongoing)</td>
</tr>
</tbody>
</table>
## 2020 Census

### Program Risk & Issue Management – Medium-Yellow Risks

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<tr>
<td>LC-033</td>
<td>Administrative Records and Third-Party Data External Factors</td>
<td>The Census Bureau is planning the use of administrative records and third-party data to reduce the need to follow up with nonrespondents through the identification of vacant and deleted housing units (those that do not meet the Census Bureau’s definition of a housing unit), the enumeration of nonresponding housing units, and the improvement of the quality of imputation for demographic characteristics that are missing for person and housing unit records. Administrative records will also be used to update the Master Address File, predict the best times to contact nonresponding households, and verify the information provided by respondents and enumerators. IF external factors or policies prevent the Census Bureau from utilizing administrative records and third-party data as planned, THEN the Census Bureau may not be able to fully meet the strategic goal of containing the overall cost of the 2020 Census or to fully utilize the data quality benefits of using administrative records in characteristic imputation.</td>
<td>Medium - Yellow</td>
<td>3</td>
<td>4</td>
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<td>1. Identify external stakeholders that have an interest in Census Bureau policies regarding administrative records and third-party data usage. (Ongoing) 2. Develop a stakeholder communication plan for identified external stakeholders. (Ongoing) 3. Regularly communicate to and seek feedback from identified external stakeholders on design decisions and research and testing results related to the use of administrative records and third-party data for the 2020 Census. (Ongoing) 4. Assess impacts of any changes to the design based on feedback from external stakeholders and update plans accordingly. (Ongoing) 5. Monitor external factors and policies that may impact the Census Bureau’s planned use of administrative records and third-party data for the 2020 Census. (Ongoing)</td>
</tr>
<tr>
<td>LC-036</td>
<td>Operations and Systems Integration</td>
<td>Due to the critical timing of census operations and the potential impact of systems not being ready to support them, the 2020 Census Program must have an accurate gauge of the progress made towards integrating the various operations and systems that support the program, including enterprise solutions (i.e., CEDCaP, CEDSCI, and C-SHARPS). The monitoring of the progress towards integration must take place throughout the planning, development, and testing stages of the operations and systems. IF the 2020 Census Program does not monitor the various operations and systems to ensure that integration is successful prior to implementation, THEN the strategic goals and objectives of the program may not be met.</td>
<td>Medium - Yellow</td>
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<td></td>
<td>1. Leverage DITD’s Systems Engineering and Integration (SE&amp;I) System Development Life Cycle system readiness/phase gate review process, the SE&amp;I program metrics dashboard, and various 2020 Census Program’s governance forums to provide a current sense of where all solutions providers are in the system development process and to raise issues quickly for corrective action. (Ongoing) 2. Conduct regularly scheduled reviews of the 2020 Census operations. (Complete) 3. Ensure all operational areas and their associated IPTs have adequate resources assigned to integration efforts and required project artifacts are developed and approved. (Ongoing) 4. Ensure each planned census test has an approved GOSC (Goals, Objectives, and Success Criteria), adequate resources to plan and conduct are identified and assigned, a detailed test plan is developed and approved (including key milestones and roles and responsibilities), and deadlines are being met through a regular management review with the test team. (Ongoing) 5. Ensure adequate technical review sessions are planned and conducted in conjunction with Systems Engineering and Integration staff (including the systems engineer responsible for developing the solutions). (Ongoing) 6. Create an operational integration design team to support the 2020 Census through creation and distribution of artifacts, which depict integration between the operations. (Complete)</td>
</tr>
</tbody>
</table>
### Risk ID: LC-038  
**Title:** Testing of Field Operations Quality Control Procedures  
**Description:**  
Most 2020 Census field operations include quality control procedures to ensure that the collected data meet the acceptable levels of quality. However, the field quality control procedures have gone through only limited testing as of 2016 due to reassessment and prioritization within the 2020 Census Program. If the 2020 Census field operations do not adequately test their respective quality control procedures prior to implementation, THEN the quality control methods may not be effective, requiring additional funding and effort to meet the established levels of quality for the 2020 Census data.  
**Exposure Level and Color:** Medium - Yellow  
**Probability:** 3  
**Impact:** 4  
**Mitigation Plan:**  
1. Communicate the necessity of testing and implementing quality control procedures as part of the field operations and tests. (Ongoing)  
2. Document the quality control procedures for each field operation supporting the 2020 Census Program. (Ongoing)  
3. Devise alternate testing plans for QC procedures. (Complete)

### Risk ID: LC-042  
**Title:** Late Operational Design Changes  
**Description:**  
After key planning and development milestones are completed, stakeholders may disagree with the planned innovations behind the 2020 Census and decide to modify the design, resulting in late operational design changes. If operational design changes are required following the completion of key planning and development milestones, THEN the 2020 Census Program may have to implement costly design changes, increasing the risk for a timely and successful 2020 Census.  
**Exposure Level and Color:** Medium - Yellow  
**Probability:** 3  
**Impact:** 4  
**Mitigation Plan:**  
1. Identify internal and external stakeholders that have an interest in the 2020 Census operational design. (Ongoing)  
2. Develop a stakeholder communications plan for identified internal and external stakeholders. (Ongoing)  
3. Regularly communicate with and seek feedback from identified external stakeholders on design decisions and research and testing results. (Ongoing)  
4. Monitor external factors and policies that may impact the Census Bureau’s planned innovations for the 2020 Census operational design. (Ongoing)  
5. Establish a change control management process to assess impacts of change requests to facilitate decision-making. (Complete)  
6. Prepare for rapid response to address potential changes and make decisions based on the results of the change control process. (Ongoing)
## 2020 Census Program Risk & Issue Management – Medium-Yellow Risks

<table>
<thead>
<tr>
<th>Risk ID</th>
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<tr>
<td>LC-046</td>
<td>Insufficient Levels of Staff with Subject Matter Skillsets</td>
<td>The 2020 Census Program consists of a portfolio of projects that requires subject matter skillsets to complete the work. The potential of not having the necessary staffing levels and staff with the appropriate competencies to satisfy program objectives is a current reality. This is a result of both hiring freezes and the budgetary constraints experienced by the 2020 Census Program. In addition, with increasing numbers of staff eligible for retirement before 2020, there is also the potential of losing valuable institutional knowledge, as employees in key positions may not be accessible to share their knowledge and participate in succession planning. IF the 2020 Census Program does not hire and retain staff with the necessary subject matter skillsets at the levels required by the projects, THEN the 2020 Census Program will face staffing shortages, making it difficult to meet the goals and objectives of the program.</td>
<td>Medium - Yellow</td>
<td>3</td>
<td>4</td>
<td>1. Identify high priority competencies and staffing positions needed for the work of the 2020 Census. (Ongoing) 2. DDSSO will continue to collaborate with managers and the Human Resources Division (HRD) to facilitate hiring. (Ongoing) 3. Employ various strategies to facilitate staff retention. (Ongoing)</td>
</tr>
<tr>
<td>LC-050</td>
<td>2020 Census Contract Support</td>
<td>Many of the operations supporting the 2020 Census require contracts to assist them with system development, testing, and production activities. The acquisition process requires lead time and involves review and approval milestones, both at the agency and department levels. Once awarded, the implementation of the contract may be delayed for a number of reasons, including protests or lack of funding. Any delay with the awarding or implementation of these contracts means the operations may have to shorten the timeframe for some activities or possibly cancel certain activities. IF there are difficulties in the awarding or implementation of the contracts that are supporting the 2020 Census, THEN delays may occur in the system development, testing, or production stages, which may force the operations supporting the 2020 Census to shorten the timeframe for completing some activities or cancel certain activities.</td>
<td>Medium - Yellow</td>
<td>3</td>
<td>4</td>
<td>In development.</td>
</tr>
<tr>
<td>Risk ID</td>
<td>Title</td>
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<tr>
<td>LC-043</td>
<td>Cloud Implementation</td>
<td>Some systems supporting the 2020 Census Program plan to mitigate the surging demand on the systems by utilizing the Cloud as part of the architecture. IF the Cloud, and the migration to it, is not evaluated, designed, and tested thoroughly, THEN any implementation of the Cloud may introduce system failures or process gaps with downstream implications.</td>
<td>Medium - Yellow</td>
<td>3</td>
<td>3</td>
<td>1. Develop plans for alternate deployments of each 2020 Census system that is targeted to be hosted on the Cloud. (Ongoing) 2. Assign 2020 Census Technical Integrator to develop a physical architecture for the 2020 Census System of Systems, including the assessment and design of a cloud architecture for the 2020 Census. (Ongoing) 3. Assign the 2020 Census Technical Integrator to assess every system of the 2020 Census System of Systems, including the systems suitability for the Cloud and the migration strategy if the system is determined to be suitable for the Cloud. (Ongoing)</td>
</tr>
<tr>
<td>LC-044</td>
<td>Systems Scalability</td>
<td>All systems supporting the 2020 Census Program must be able to handle the large, dynamic demands of the operations and support the system of systems. IF systems are not properly designed, tested, and implemented with the ability to scale, THEN critical issues may arise when the need to scale up (or down) any system in the environment occurs, potentially eliminating the ability to scale during the production window of operations, and thereby limiting the capacity to support the operations or leading to failure of the system.</td>
<td>Medium - Yellow</td>
<td>3</td>
<td>3</td>
<td>1. Under direction of SE&amp;I Chief Architect, conduct scalability assessment with the Technical Integrator (TI) team. (Ongoing) 2. Provide accurate demand models to the systems to ensure proper system of systems design. (Ongoing)</td>
</tr>
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<tr>
<td>LC-047</td>
<td>Demand Model</td>
<td>Internet, telephony, and paper demand models are developed based on historical and test data. Development teams use those data to make predictions regarding system scalability. Changes to operations can have impacts to these models, and if changes continue to occur, the accuracy of the models will be reduced pending updates. IF operational changes occur that affect the workloads, THEN all systems could be adversely impacted if the updates are not made in time to inform the system developers of the proper demand.</td>
<td>Medium - Yellow</td>
<td>3</td>
<td>3</td>
<td>1) Results from the 2018 End-to-End Census Test will be used to refine the external demand model, in order to improve its accuracy. (Ongoing) 2) Compare model output with census data from other countries. (Ongoing) 3) Incorporate operational changes as soon as possible. (Ongoing) 4) Include impacts of advertising campaigns and partnership events on demand models. (Ongoing) 5) Include maximum system capacity on models to readily identify system constraints. (Ongoing) 6) Include sixth mailing in demand models (as a what-if scenario). (Ongoing)</td>
</tr>
</tbody>
</table>
2020 Census Update

Oversight Committee Meeting
Briefing for Secretary Wilbur Ross

February 26, 2018

Albert E. Fontenot, Jr., Associate Director
Decennial Census Programs Directorate
Agenda

• Hot Topics – Albert E. Fontenot, Jr.
• Budget – Ben Taylor
• Major Contracts – Luis J. Cano
• Cybersecurity – Kevin Smith
• Systems Readiness – Atri Kalluri
• Stakeholders and Oversight – Albert E. Fontenot, Jr.
• Risks – James B. Treat
• Critical Path – James B. Treat
• Periodic Performance Management Reports – James B. Treat
2020 Census

Hot Topics for DOC Awareness: February 21, 2018

2020 Census Printing and Mailing Contract
- On October 16, 2017, the U.S. Government Publishing Office (GPO) awarded contract to Cenveo, Inc. on Census’ behalf.
- Production printing for the 2018 End-to-End Census Test began on February 14. They have completed printing of the questionnaires, letters, inserts and envelopes. All that remains is the postcards.
- Attorneys from DOC, the Government Publishing Office, and the US Attorney’s Office are coordinating efforts to seek additional information and assurances of future performance from Cenveo and intend to take all appropriate steps consistent with the contract and applicable law to protect the government’s interests.
- The USAO will send a letter to Cenveo’s bankruptcy counsel in order to gather information geared towards determining whether Cenveo will have the financial ability to perform the contract. Based upon the terms of the Restructuring Support Agreement, the debtors’ bankruptcy is on a "fast-track" with a plan to be filed by early April and for confirmation and consummation of that plan to be complete before the end of July.

Residence Criteria
- A Federal Register Notice published on February 8 outlined the final Residence Criteria for the 2020 Census.
  - Press activity and Congressional inquiries have been minimal.

2018 End-to-End Test Readiness
- We have 2,566 qualified candidates (as of February 15) for the Nonresponse Followup operation. Our goal for entering training is 1,166 so that we can have about 1,049 trained entering NRFU.
  - The Census Bureau will continue to aggressively recruit candidates and remains concerned about recruiting for the 2020 Census.
  - Due to legal obstacles identified by attorneys at the USPS and the Department of Commerce we have decided not to pursue the pilot test of Postal Carriers as Census Enumerators.

2020 Census Operational Readiness
- 12 of the 40 Wave 1 area census offices have a lease award/signed occupancy agreement, as of February 15. Space has been identified for 20 of the 208 Wave 2 area census offices, as of February 15.
  - We have concerns, which the General Services Administration (GSA) shares, that the leasing process is not moving forward as quickly as it needs to in some areas. GSA is bringing in their national team to address this.
  - Space for five of the six regional census centers has been accepted as of February 13.

2020 Census Questionnaire
- Systems have been adjusted to handle the 2 question format for the Race/Ethnicity Question.
- We are prepared to deliver the questions to Congress by March 31 pending resolution of the Department of Justice’s request for the addition of a question on citizenship to the 2020 Census Short Form.

Integrated Partnership and Communications
- The mail out of questionnaires for the Census Barriers, Attitudes and Motivators Survey (CBAMS) for the qualitative survey is scheduled for February 20, with the focus planned for March 14 to April 19. The focus groups will provide critical data on small population groups and people who speak languages other than English.
Refer to Budget and Contract Slides
Cybersecurity
2020 Census
Cybersecurity – Summary

The Census Cybersecurity effort is to resolve these risks:

External Risks
• Compromising User Devices (Public)
• Compromising External Network Access
• Impersonating the Census
• Inserting Invalid Responses

Internal Risks
• Disrupting the Internet Self Service Website
• Data Breaches
• Compromising User Devices (Census)

The Census Bureau are taking actions to mitigate these risks through coordination with Federal partners by:

Creating a Scalable Secure Network for 2020 Census Respondents:
Working with OMB, DHS, and Cloud Provider to develop scalable and secure network connection in the cloud.
• Federal Working Group with Cloud Provider (OMB, DHS, Cloud Provider, Network Providers)
• Current Solution is Network Provider Based; Future Solution will be Cloud Provider Based
• Federal CIO formalized approval for our approach for Future Solution* (working towards using during 2018 End-to-End Census Test)

Strengthening Our Incident Response Capabilities (DHS FIRE):
Advance ability to continually Identify, Protect, Detect, Respond, and Recover from possible cyber threats.
• Moving forward with creating Insider Threat capability plan with outside expertise
• Started Federal Monitoring “Continuous Diagnostics and Mitigation” (DHS CDM) Implementation with DOC
• Improving visibility of cybersecurity issues by implementing tools from private industry and federal government

Improving Our Cybersecurity Posture:
Improve knowledge, processes, procedures, and/or technology.
• Increasing knowledge resources
  • Collaboration with NIST Cybersecurity Center of Excellence (NCCoE) in Feb ’18
  • Regular Cybersecurity briefings with Department of Homeland Security (DHS)
  • Cybersecurity Unified Coordination Group (Federal Intelligence Community) simulation for major incident in Summer ’18 (table top)
• Testing Technology
  ★ Authorities to Operate (ATOs) for 2020 Systems are 75% Done for FY 18 End to End Test and On Schedule. Many Actions Remain.
  • Internet Self Response system security tested by Private Industry (Done Jan ’18), Federal DHS (Done in Feb ’18; report in Mar ’18)
  • Engaging “Red Teams” from Industry and Federal (DHS) to conduct “slow and under the radar” cybersecurity attacks

The Census Bureau is working on a scalable secure network and improving their ability to actively see, secure, and resolve cybersecurity risks for the 2020 census.
2020 Census  
Cybersecurity – Scalable Secure Network for 2020 Census Respondents

Working with OMB, DHS, and Cloud Provider to develop scalable and secure network connection in the cloud to improve the User Experience for 2020 Respondents for Internet Self Response.

**Background**


- Secure Federal Network Connectivity through Trusted Internet Connection (TIC)
  - DHS Einstein (Classified Monitoring of Network), Other Technologies/Configurations
- Current Implementations through Internet Service Provider to Federal Locations
  - Census has 2 TICs (1 Suitland, MD Office; 1 Bowie, MD Data Center)

**Problem**

Current Federal Secure Network Connection will be slower internet respondents.

- Current Solution is Network Provider Based (AT&T, Verizon, CenturyLink, ..) (RED)
- Current Solution makes all respondents travel through Washington DC
  - Census has all current network through Metro DC
  - Cloud for Data Collection in Washington State (AWS)
- Internet Self Response website slower based on some users with multiple coast to coast trips
  - User Experience depends on System & Network Latency (time)
  - The more Latency (time) adds up to the dramatically worse it gets at peak loads

**Proposed Resolution**

Create scalable and secure network connection in the cloud that reduces unnecessary “travel times”

- Future Solution will be Cloud Provider Based (Amazon Web Services, Microsoft, ..) (BLUE & GREEN)
- Reduce “travel time” to website by connecting directly to West Coast cloud. No cross country layovers
- Initiated, Established, and Working with Federal/Industry Partners (OMB, DHS, Cloud Provider, Network Providers)
- Federal CIO (OMB) formalized support in February ’18 for Census to “continue outside of existing TIC policies”

The Census is “continuing outside of existing TIC policies” in support of validating approaches and informing OMB, DHS, and others on the Executive Order to “Strengthen the Cybersecurity of Federal Networks and Critical Infrastructure”.
2020 Census

Cybersecurity – Authority to Operate (ATO) Status

2018 End to End Test – 44 Systems

No Level of Effort (75%) (Green)
- 73% have obtained ATOs (done)
- 2% (1 system) does not require an ATO (NA)

Small Level of Effort (18%) (Grey)
- 16% have ATOs and are moving to 2020 Infrastructure. These systems are moving from servers in the Census data center to the technical integrator
- 2% have ATOs and are being modified. These systems are already housed in the infrastructure and are developing additional capabilities.

High Level of Effort (7%) (Blue)
- 7% are new; Getting ATO before FY18 Test

2020 Census – 52 Systems

No Level of Effort (88%) (Green)
- 86% will have obtained ATOs from the FY18 End to End Test (done)
  - These systems will be maintained annually
- 2% (1 system) does not require an ATO (NA)

High Level of Effort (TBD) (Blue)
- 12% are new;
  - Post Enumeration Survey
  - Customer Relationship Management and Experience
  - Decennial Device as a Service

The Authority to Operate (ATO) process is quality control for Cybersecurity done for all systems to continually reduce information technology security risks to an acceptable level.
2020 Census
Cybersecurity – Actions Remain- Plan of Action and Milestones (POA&Ms)

After ATOs are Granted, POA&Ms are recorded and continuously managed for the life of the system. Continually identifying and tracking POA&Ms are healthy in Cybersecurity. Not fixing them as planned is unhealthy

Census has completed a large number of new ATOs for 2020 which naturally have POA&Ms recorded. Census chooses to have more POA&Ms being tracked at a detailed level to show progress and increased visibility for ourselves and oversight (Our “Punch List” is 10+ times more than other Federal entities; 1,000’s instead of 100’s)

Focus on the progress to reduce POA&Ms. The number of POA&Ms themselves is the Census’ choice for visibility.

**Summarize – Subjectively Record Issue with No Occurrences**
- Majority of Federal Government uses this level
- Process - Evaluate security controls at the Top Level
- Oversight – Continually asks questions for more data
- Example
  - Technology: “Is Accesses Controlled?” “Yes; the infrastructure is protected”
  - House: “Is your house insulated?” “Yes; the house is insulated”
- Gaps – Subjective Risk Acceptance; Hard to Show Progress

**Detail – Objectively Record Issues and Occurrences**
- Census Bureau built to this level based on numerous recommendations of Oversight (GAO, OIG)
- Process - Evaluate security controls within the Top Level; document all the parts
- Oversight – Has the data they need to understand risks more fully
- Example
  - Technology: “Where is Accesses Controlled?” “Many different areas with different controls”
  - House: “Where is your house insulated?” “In exterior walls, front door has weather stripping, less inside”
- Gaps – Objective Risk Acceptance; Able to Show Progress; “Punch List” to be done and/or accepted
Refer to Systems Readiness Document
2020 Census
Stakeholders and Oversight

OIG

• 2020 Census Area Census Office (ACO) Locations Audit
  • Formal exit meeting will be held on February 23 to learn about preliminary findings and draft report expected date.
  • The audit included a close look at the delineation criteria and model, as well as the Life Cycle Cost Estimate associated with field infrastructure innovation.

• Background Check Audit
  • Census comments on draft report received on Background Check Audit were delivered to OIG on February 5. Final report is expected by late February.
  • These are the tentative findings, which OIG discussed during an exit conference:
    o Escalating costs and inadequate quality assurance practices pose risks to 2020 Census background check activities.
    o The Census Bureau is not adequately monitoring contractor activities.
    o Program officials are not always allocating background check costs to the correct fund.
  • The Census Bureau is developing a response and will provide comments by late January.

• CEDCaP Audit
  • The objectives are to determine whether (1) the Census Bureau is prepared to test its 2020 Census Security Architecture during the 2018 End-to-End Census Test; and (2) there are cost issues that will affect the readiness of the security architecture, or any other relevant systems.

GAO

• Life Cycle Cost Estimate (LCCE) Audit
  • The LCCE audit continues.
  • Their questions and topics of interest are based on their examining of the revised Basis of Estimation documentation submitted to them on December 11.

• Systems Readiness Audit
  • Informed by GAO on February 5 that the Systems Readiness Audit will not have a formal report issued but that GAO would continue regular briefings with congressional oversight and release congressional testimony as appropriate.

• Plans for Hard-to-Count Populations Audit
  • GAO is beginning this work after receiving a request from the House Committee on Oversight and Government Reform.
  • The entrance meeting with GAO was held on December 6.
  • Research Questions and Scope:
    o What socio-demographic groups are considered “hard to count” and why?
    o What is the status of the Census Bureau’s efforts to enumerate the “hard to count” in 2020?
    o To what extent is the Bureau’s current plans for enumerating the “hard to count” in 2020 addressing the nation’s changing demographics and key design changes introduced for the 2020 Census; and leveraging earlier lessons learned (e.g., prior recommendations from GAO, NAS, DOC advisory committees, the Census Bureau’s own evaluations and experiments, and others)?
  • GAO is conducting meetings with various Census Bureau experts and documents are being provided to GAO, as requested.
# 2020 Census OIG Recommendations

<table>
<thead>
<tr>
<th>Topics</th>
<th>Total Recs</th>
<th>Closed Recs</th>
<th>Open Recs</th>
<th>Recs with Action Plan Due Date in Future</th>
<th>Documents Submitted: Awaiting OIG Decision to Close</th>
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<tbody>
<tr>
<td>Address Canvassing Test</td>
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<td>5</td>
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<td>4</td>
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<td>Administrative Records</td>
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<td>1</td>
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<tr>
<td>Life Cycle Cost Estimate</td>
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<td>1</td>
<td>4</td>
<td>3</td>
<td>1</td>
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<tr>
<td>2015 Test Design</td>
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<td>3</td>
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<td>2020 Census Planning</td>
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<tr>
<td>Master Address List</td>
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<td>6</td>
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<td><strong>TOTAL</strong></td>
<td><strong>61</strong></td>
<td><strong>46</strong></td>
<td><strong>15</strong></td>
<td><strong>5</strong></td>
<td><strong>10</strong></td>
</tr>
</tbody>
</table>
2020 Census
GAO Recommendations

*Other includes the following topics: Project Management, Oversight, United States Postal Service, Nonresponse Follow-up, Address Canvassing, and Census Coverage Measurement.

**This recommendation, related to Address Canvassing, is for 2030.

**GAO has made 84 recommendations since 2007 about the 2020 Census. Action plans are in place for all recommendations.

51 Have been closed by GAO.
5 Have due dates in the future (4 in 2018 and 1 for the 2030 Census).
14 Relate to ongoing audits on the Lifecycle Cost Estimate, the Schedule and our efforts to enumerate Hard-to-Count populations. GAO will not close these until the ongoing audits are complete.
11 Artifacts have been provided to GAO, and we are working with GAO to identify the additional documentation they need to close these out. We expect progress on these in the near future.
3 These are recommendations that GAO is likely to close as “Not Fully Implemented” because, while artifacts have been provided, discussions with GAO clearly indicate our efforts to date, or planned, will not fulfil the recommendation.

<table>
<thead>
<tr>
<th>Topics</th>
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<tr>
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<td>Field Training, Workforce &amp; Recruitment/Integrated Partnership and Communications</td>
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<td>5</td>
<td>13</td>
<td>4</td>
<td>8</td>
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<tr>
<td>Other*</td>
<td>17</td>
<td>14</td>
<td>3</td>
<td>1**</td>
<td>3</td>
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<td>TOTAL</td>
<td>84</td>
<td>51</td>
<td>33</td>
<td>5</td>
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</table>

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Risk Management
The risk and issue management process is conducted at all levels of the 2020 Census Portfolio.
The selected risks that follow represent the major concerns that could affect the design or the successful implementation of the 2020 Census.

- Cost Impacts of Late Changes (Probability 3, Impact 5) **RED**
- Public Perception of ability to Safeguard Response Data (Probability 3, Impact 5) **RED**
- Cybersecurity Incidents (Probability 3, Impact 5) **RED**

Yellow risks with Probability and Impact equal to or great than 3, see background slides
Critical Path Report
2020 Census
Critical Path Report – 2020 Integrated Master Schedule

- Schedule contains
  - Over 25,000 activities
  - Over 42,000 interdependencies
  - 35 Operations and 52 Systems
- Baselined the schedule on December 14, 2017
- Started reporting status weekly on December 15, 2017
- Conducting a chronological review for integration of activities
  - Operations for Releases 1 & 2 – Completed January 26, 2018
  - Systems for Releases 1 & 2 – In process, planned finish on March 16, 2018
  - Early Data Collection Operations for Release 3 – Planned finish on April 20, 2018
  - Remaining Data Collection Operations for Release 3 – Planned finish on June 1, 2018
  - Remaining Operations, Release 4 – Planned finish on July 13, 2018

Refer to Handout
Status Reporting

Periodic Performance Management Reports
## Periodic Performance Management Reports
### Complete Listing of Reports

<table>
<thead>
<tr>
<th>Status</th>
<th>Report Title</th>
<th>Slide Number</th>
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<tbody>
<tr>
<td>![Green Circle]</td>
<td>Area Census Office Lease Status – Wave 1</td>
<td>18</td>
</tr>
<tr>
<td>![Green Circle]</td>
<td>Area Census Office Lease Status – Wave 2</td>
<td>19</td>
</tr>
<tr>
<td>![Green Circle]</td>
<td>Regional Census Center Space Acceptance &amp; Opening Status</td>
<td>20</td>
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<tr>
<td>![Green Circle]</td>
<td>2020 Local Update of Census Addresses (LUCA)</td>
<td>21</td>
</tr>
<tr>
<td>![Yellow Circle]</td>
<td>Recruiting for 2018 Peak Operations</td>
<td>22</td>
</tr>
</tbody>
</table>

### Legend
- ![Green Circle] On Track
- ![Yellow Circle] Requires Attention
- ![Red Circle] Management Focus
Wave 1
Area Census Office (ACO) Lease Status

Status: Management Focus

Data current as of: February 15, 2018

Completion Date: March 31, 2018

Wave 1 Area Census Office (ACO) Lease Status

- ACO Space Not Identified: 8
- ACO Space Identified (Pending Lease Award/Occupancy Agreement [OA]): 20
- Lease Award/OA Signed: 12

Source: Weekly Field Division Report, February 15, 2018

1. Concord, NH
2. Bronx South, NY
3. Caguas, PR
4. Baton Rouge, LA
5. Denver, CO
6. Houston West, TX
7. San Antonio East, TX
8. Oakland, CA
Wave 2
Area Census Office (ACO) Lease Status

Status: On Track

Data current as of: February 15, 2018

Completion Date: September 30, 2018

Wave 2 Area Census Office (ACO) Lease Status

- ACO Space Not Identified
  - 188
- ACO Space Identified (Pending Lease Award/ Occupancy Agreement [OA])
  - 20
- Lease Award/OA Signed

Source: Weekly Field Division Report, February 15, 2018
### Regional Census Center (RCC) Status

<table>
<thead>
<tr>
<th>Status:</th>
<th>On Track</th>
</tr>
</thead>
</table>

**Data current as of:**

**February 13, 2018**

**Upcoming RCC Space Acceptance Dates:**

- **Atlanta RCC**, accepted **February 12, 2018**
- **New York RCC**, projected **March 23, 2018**

**RCC Open Dates:**

- **April 1, 2018**
  - (New York RCC to open **April 27, 2018**)

#### Legend

- **Not Started**
- **Completed**
- **On Track**
- **Management Focus**
- **Requires Attention**

**Source:** Reported via John Donnelly email February 13, 2018
Periodic Performance Management Reports
2020 Local Update of Census Addresses (LUCA)

2020 Local Update of Census Addresses (LUCA)

Status:
- On Track

Data current as of:
February 15, 2018

Completion Date:
January 31, 2018

Notes:
- Extended the registration deadline for natural disaster areas until January 31, 2018
- 45 States are registered to participate, up from 28 states in 2010 LUCA

Registration
- 11,560

Coverage Measures
- Of the population covered: 98.0%
- Of the housing covered: 97.9%

Source: Daily LUCA E-mailed Report, February 15, 2018
Periodic Performance Management Reports

Recruiting for 2018 Peak Operations

Status:
- Management Focus

Data current as of:
- February 15, 2018

Completion Date:
- March 5, 2018

Notes:
- We plan to hire 5 Census Field Managers and 45 Census Field Supervisors.

Source: Regional Disposition Summary (D-424F) Report, February 15, 2018
Background on Risk Management
## Cost Impacts of Late Changes

The budget process requires the 2020 Census Portfolio to produce estimates for out-year budgets before the cost of the final design has been identified and estimated. If later in the 2020 Census life cycle, it is discovered that certain cost projections cannot be met, THEN the design will have to be changed, potentially impacting quality, forcing the implementation of an inadequately tested design, and having to request additional funds which might put the 2020 Census over the cost goal.

**High - Red**

<table>
<thead>
<tr>
<th>Mitigation Plan</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Develop strong budget justifications that show negative impact of insufficient funds. (Ongoing)</td>
<td></td>
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<tr>
<td>2. Develop a strong communications package for stakeholders to use in defense of 2020 Census budget requests. (Ongoing)</td>
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<td>3. Perform continuous reviews of the cost assumptions and the feasibility in meeting the targeted goals. (Ongoing)</td>
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<td>4. Ensure there is sufficient contingency funding to address late changes. (Ongoing)</td>
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## Cybersecurity Incidents

Cybersecurity incidents (e.g., breach, denial of service attack) could happen to the Census Bureau’s authorized IT systems, such as the Internet self-response instrument, mobile devices used for fieldwork, and data processing and storage systems. IT security controls will be put in place to protect the confidentiality, integrity, and availability of the IT systems and data. If a cybersecurity incident occurs to the systems supporting the 2020 Census, THEN additional technological efforts will be required to repair or replace the systems affected in order to maintain secure services and data.

**High - Red**

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<tr>
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<tbody>
<tr>
<td>1. Develop a strategy to build and maintain the public’s confidence in the Census Bureau’s ability to keep their data safe. (Ongoing)</td>
<td></td>
</tr>
<tr>
<td>2. Research other Census Bureau divisions, other government agencies, other countries, and the public sector to gain insight into how they have effectively mitigated the issue of public trust and IT security. (Ongoing)</td>
<td></td>
</tr>
<tr>
<td>3. Continually monitor the public’s confidence in data security in order to gauge their probable acceptance of the Census Bureau’s methods for enumeration. (Ongoing)</td>
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</tr>
<tr>
<td>4. Monitor system development efforts to ensure the proper Census Bureau IT security guidelines are followed during the system development phase. (Ongoing)</td>
<td></td>
</tr>
<tr>
<td>5. Prepare for rapid response to address any detected cybersecurity incidents. (Ongoing)</td>
<td></td>
</tr>
</tbody>
</table>

## Public Perception of Ability to Safeguard Response Data

The accuracy and usefulness of the data collected for the 2020 Census are dependent upon the ability to obtain information from the public, which is influenced partly by the public’s perception of how well their privacy and confidentiality concerns are being addressed. The public’s perception of the Census Bureau’s ability to safeguard their response data may be affected by security breaches or the mishandling of data at other government agencies or in the private sector. If a substantial segment of the public is not convinced that the Census Bureau can safeguard their response data against data breaches and unauthorized use, THEN response rates may be lower than projected, leading to an increase in cases for follow-up and cost increases.

**High - Red**

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</tbody>
</table>
## 2020 Census
### Portfolio Risk & Issue Management – Medium-Yellow Risks

<table>
<thead>
<tr>
<th>Risk ID</th>
<th>Title</th>
<th>Description</th>
<th>Exposure Level and Color</th>
<th>Probability</th>
<th>Impact</th>
<th>Mitigation Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td>LC-045</td>
<td>Major Disasters</td>
<td>Major disasters (e.g., earthquake, flood, tornado, epidemic, and terrorist attack) can affect the populations of a geographic area (e.g., town, county, state) and prevent people from self-responding to the 2020 Census or being contacted by field staff. Major disasters can disrupt operations at key facilities (e.g., Headquarters, National Processing Center, Regional Census Centers, and Area Census Offices) and supporting infrastructure (e.g., Post Offices and telecommunications). IF a major disaster occurs during the final preparations for or the implementation of the 2020 Census (October 2017 – September 2023), THEN operations may not be able to be executed as planned, leading to increased costs, schedule delays, and lower quality data.</td>
<td>Medium - Yellow</td>
<td>4</td>
<td>3</td>
<td>1. Plan for a rapid response team to access the disaster and recommend a course of action to senior managers. (Ongoing) 2. Where feasible, the Census Bureau will develop secondary operations facilities, implement regular backup of automated systems and data, and provide uninterruptible power. (Ongoing) 3. Develop Continuity of Operations (COOP) plans for all key facilities (HQ, NPC, RCCs, ACOs, etc.). (Ongoing) 4. Develop Continuity of Operations (COOP) plans for all operations. (Ongoing) 5. Ensure there is contingency funding in the budget to cover Continuity of Operations (COOP) plans. (Ongoing) 6. Consult with other government agencies on best ways to continue operations in areas affected by a major disaster. (Ongoing)</td>
</tr>
<tr>
<td>LC-010</td>
<td>Enterprise IT Solutions</td>
<td>The Census Bureau, wherever feasible, will leverage cross-program IT solutions and has begun the work necessary to ensure this is achieved. However, enterprise solutions (i.e., CEDCaP, CEDSCI, and C-SHaRPS) may not address all of the 2020 Census Portfolio requirements. In these cases, impacts must be identified and proper actions taken to resolve the situation. IF enterprise IT solutions cannot meet the 2020 Census Portfolio requirements, THEN existing systems may require substantial modifications or entirely new systems may have to be developed, adding complexity and increasing risk for a timely and successful 2020 Census.</td>
<td>Medium - Yellow</td>
<td>3</td>
<td>4</td>
<td>1. Engage with enterprise efforts to ensure that solutions architectures align and provide continued support for 2020 Census requirements development and management. (Ongoing) 2. Participate in agency-wide solution development (i.e., avoid custom solutions where enterprise or off-the-shelf solutions will suffice) and ensure that contingencies (i.e., off-ramps) are developed early and exercised when necessary. (Ongoing) 3. Determine the extent existing systems from the 2010 Census can be modified and reused if necessary. (Complete) 4. Design IT solutions that are flexible enough to incorporate design changes. (Ongoing) 5. Establish a change control management process to assess impacts of change requests to facilitate decision-making. (Complete) 6. Prepare for rapid response to implement change based on the results of the change control process. (Ongoing)</td>
</tr>
</tbody>
</table>
## 2020 Census Program Risk & Issue Management – Medium-Yellow Risks

<table>
<thead>
<tr>
<th>Risk ID</th>
<th>Title</th>
<th>Description</th>
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<th>Mitigation Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td>LC-033</td>
<td>Administrative Records and Third-Party Data - External Factors</td>
<td>The Census Bureau is planning the use of administrative records and third-party data to reduce the need to followup with nonrespondents through the identification of vacant and deleted housing units (those that do not meet the Census Bureau’s definition of a housing unit), the enumeration of nonresponding housing units, and the improvement of the quality of imputation for demographic characteristics that are missing for person and housing unit records. Administrative records will also be used to update the Master Address File, predict the best times to contact nonresponding households, and verify the information provided by respondents and enumerators. IF external factors or policies prevent the Census Bureau from utilizing administrative records and third-party data as planned, THEN the Census Bureau may not be able to fully meet the strategic goal of containing the overall cost of the 2020 Census or to fully utilize the data quality benefits of using administrative records in characteristic imputation.</td>
<td>Medium - Yellow</td>
<td>3</td>
<td>4</td>
<td>1. Identify external stakeholders that have an interest in Census Bureau policies regarding administrative records and third-party data usage. (Ongoing) 2. Develop a stakeholder communication plan for identified external stakeholders. (Ongoing) 3. Regularly communicate to and seek feedback from identified external stakeholders on design decisions and research and testing results related to the use of administrative records and third-party data for the 2020 Census. (Ongoing) 4. Assess impacts of any changes to the design based on feedback from external stakeholders and update plans accordingly. (Ongoing) 5. Monitor external factors and policies that may impact the Census Bureau’s planned use of administrative records and third-party data for the 2020 Census. (Ongoing)</td>
</tr>
<tr>
<td>LC-036</td>
<td>Operations and Systems Integration</td>
<td>Due to the critical timing of census operations and the potential impact of systems not being ready to support them, managers must have an accurate gauge of the progress made towards integrating the various operations and systems that support the 2020 Census, including enterprise solutions (i.e., CEDCaP, CEDSCI, and C-SHARePS). The monitoring of the progress towards integration must take place throughout the planning, development, and testing stages of the operations and systems. IF the various operations and systems are not monitored properly to ensure that integration is successful prior to implementation, THEN the strategic goals and objectives of the 2020 Census may not be met.</td>
<td>Medium - Yellow</td>
<td>3</td>
<td>4</td>
<td>1. Leverage DITD’s Systems Engineering and Integration (SE&amp;I) System Development Life Cycle system readiness/phase gate review process, the SE&amp;I program metrics dashboard, and various 2020 Census Program’s governance forums to provide a current sense of where all solutions providers are in the system development process and to raise issues quickly for corrective action. (Ongoing) 2. Conduct regularly scheduled reviews of the 2020 Census operations. (Complete) 3. Ensure all operational areas and their associated IPTs have adequate resources assigned to integration efforts and required project artifacts are developed and approved. (Ongoing) 4. Ensure each planned census test has an approved GOSC (Goals, Objectives, and Success Criteria), adequate resources to plan and conduct are identified and assigned, a detailed test plan is developed and approved (including key milestones and roles and responsibilities), and deadlines are being met through a regular management review with the test team. (Ongoing) 5. Ensure adequate technical review sessions are planned and conducted in conjunction with Systems Engineering and Integration staff (including the systems engineers responsible for developing the solutions). (Ongoing) 6. Create an operational integration design team to support the 2020 Census through creation and distribution of artifacts, which depict integration between the operations. (Complete)</td>
</tr>
</tbody>
</table>
# 2020 Census

## Program Risk & Issue Management – Medium-Yellow Risks

<table>
<thead>
<tr>
<th>Risk ID</th>
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</thead>
<tbody>
<tr>
<td>LC-038</td>
<td>Testing of Field Operations Quality Control Procedures</td>
<td>Most 2020 Census field operations include quality control procedures to ensure that the collected data meet the acceptable levels of quality. However, the field quality control procedures have gone through only limited testing since 2016 due to reassessment and prioritization within the 2020 Census Portfolio. If the 2020 Census field operations do not adequately test their respective quality control procedures prior to implementation, THEN the quality control methods may not be effective, requiring additional funding and effort to meet the established levels of quality for the 2020 Census data.</td>
<td>Medium-Yellow</td>
<td>3</td>
<td>4</td>
<td>1. Communicate the necessity of testing and implementing quality control procedures as part of the field operations and tests. (Ongoing) 2. Document the quality control procedures for each field operation supporting the 2020 Census. (Ongoing) 3. Devise alternate testing plans for QC procedures. (Complete)</td>
</tr>
<tr>
<td>LC-042</td>
<td>Late Operational Design Changes</td>
<td>After key planning and development milestones are completed, stakeholders may disagree with the planned innovations behind the 2020 Census and decide to modify the design, resulting in late operational design changes. If operational design changes are required following the completion of key planning and development milestones, THEN costly design changes may have to be implemented, increasing the risk for a timely and successful 2020 Census.</td>
<td>Medium-Yellow</td>
<td>3</td>
<td>4</td>
<td>1. Identify internal and external stakeholders that have an interest in the 2020 Census operational design. (Ongoing) 2. Develop a stakeholder communications plan for identified internal and external stakeholders. (Ongoing) 3. Regularly communicate with and seek feedback from identified external stakeholders on design decisions and research and testing results. (Ongoing) 4. Monitor external factors and policies that may impact the Census Bureau’s planned innovations for the 2020 Census operational design. (Ongoing) 5. Establish a change control management process to assess impacts of change requests to facilitate decision-making. (Complete) 6. Prepare for rapid response to address potential changes and make decisions based on the results of the change control process. (Ongoing)</td>
</tr>
</tbody>
</table>
## 2020 Census

**Program Risk & Issue Management – Medium-Yellow Risks**

<table>
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</table>
| LC-046   | Insufficient Levels of Staff with Subject Matter Skillsets | The 2020 Census Portfolio consists of programs and projects that require subject matter skillsets to complete the work. The potential of not having the necessary staffing levels and staff with the appropriate competencies to satisfy portfolio objectives is a current reality. This is a result of both hiring freezes and the budgetary constraints experienced by the 2020 Census Portfolio. In addition, with increasing numbers of staff eligible for retirement before 2020, there is also the potential of losing valuable institutional knowledge, as employees in key positions may not be accessible to share their knowledge and participate in succession planning. If the 2020 Census Portfolio does not hire and retain staff with the necessary subject matter skillsets at the levels required, THEN the staffing shortages may occur, making it difficult to meet the goals and objectives of the portfolio. | Medium - Yellow          | 3           | 4     | 1. Identify high priority competencies and staffing positions needed for the work of the 2020 Census. (Ongoing)  
2. DDSSO will continue to collaborate with managers and the Human Resources Division (HRD) to facilitate hiring. (Ongoing)  
3. Employ various strategies to facilitate staff retention. (Ongoing) |
| LC-050   | 2020 Census Contract Support                   | Many of the operations supporting the 2020 Census require contracts to assist them with system development, testing, and production activities. The acquisition process requires lead time and involves review and approval milestones, both at the agency and department levels. Once awarded, the implementation of the contract may be delayed for a number of reasons, including protests or lack of funding. Any delay with the awarding or implementation of these contracts means the operations may have to shorten the timeframe for some activities or possibly cancel certain activities.  
If there are difficulties in the awarding or implementation of the contracts that are supporting the 2020 Census, THEN delays may occur in the system development, testing, or production stages, which may force the operations supporting the 2020 Census to shorten the timeframe for completing some activities or cancel certain activities. | Medium - Yellow          | 3           | 4     | In development.                                                                  |
## 2020 Census
### Program Risk & Issue Management – Medium-Yellow Risks

<table>
<thead>
<tr>
<th>Risk ID</th>
<th>Title</th>
<th>Description</th>
<th>Exposure Level and Color</th>
<th>Probability</th>
<th>Impact</th>
<th>Mitigation Plan</th>
</tr>
</thead>
</table>
| LC-043  | Cloud Implementation      | Some systems supporting the 2020 Census plan to mitigate the surging demand on the systems by utilizing the Cloud as part of the architecture. If the Cloud, and the migration to it, is not evaluated, designed, and tested thoroughly, THEN any implementation of the Cloud may introduce system failures or process gaps with downstream implications. | Medium - Yellow           | 3          | 3     | 1. Develop plans for alternate deployments of each 2020 Census system that is targeted to be hosted on the Cloud. (Ongoing)  
2. Assign 2020 Census Technical Integrator to develop a physical architecture for the 2020 Census System of Systems, including the assessment and design of a cloud architecture for the 2020 Census. (Ongoing)  
3. Assign the 2020 Census Technical Integrator to assess every system of the 2020 Census System of Systems, including the systems suitability for the Cloud and the migration strategy if the system is determined to be suitable for the Cloud. (Ongoing) |
| LC-044  | Systems Scalability       | All systems supporting the 2020 Census must be able to handle the large, dynamic demands of the operations and support the system of systems. If systems are not properly designed, tested, and implemented with the ability to scale, THEN critical issues may arise when the need to scale up (or down) any system in the environment occurs, potentially eliminating the ability to scale during the production window of operations, and thereby limiting the capacity to support the operations or leading to failure of the system. | Medium - Yellow           | 3          | 3     | 1. Under direction of SE&I Chief Architect, conduct scalability assessment with the Technical Integrator (TI) team. (Ongoing)  
2. Provide accurate demand models to the systems to ensure proper system of systems design. (Ongoing) |
# Demand Model Accuracy

Internet, telephony, and paper demand models are developed based on historical and test data. Development teams use those data to make predictions regarding system scalability. Changes to operations can have impacts to these models, and if changes continue to occur, the accuracy of the models will be reduced pending updates. IF operational changes occur that affect the workloads, THEN all systems could be adversely impacted if the updates are not made in time to inform the system developers of the proper demand. 

1) Results from the 2018 End-to-End Census Test will be used to refine the external demand model, in order to improve its accuracy. (Ongoing)  
2) Compare model output with census data from other countries. (Ongoing)  
3) Incorporate operational changes as soon as possible. (Ongoing)  
4) Include impacts of advertising campaigns and partnership events on demand models. (Ongoing)  
5) Include maximum system capacity on models to readily identify system constraints. (Ongoing)  
6) Include sixth mailing in demand models (as a what-if scenario). (Ongoing)
Submission of the 2020 Census and American Community Survey Questions to Congress

Briefing for the Department of Commerce

March 5, 2018
2020 Census and American Community Survey Subjects and Questions

Requirements

• Section 141(f) of the Census Act requires that the **subjects** included in the next census be submitted to Congress no later than 3 years before the census date.

  ✓ This document was issued on **March 28, 2017**.

• The Census Act also requires that the **questions** included in the next census be submitted to Congress no later than 2 years before the census date.

  ➢ A document that meets this requirement for the 2020 Census and the ACS will be submitted to Congress by **March 31, 2018**.
How a Question Becomes Part of the Census (short form)

Steps in the Process

<table>
<thead>
<tr>
<th>Authority</th>
<th>The discretionary authority for defining the questions on the Decennial Census Short Form resides with the Secretary of Commerce.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Review of Request</td>
<td>Requests undergo legal, technical, and policy review to determine whether the question should be included on the short form.</td>
</tr>
</tbody>
</table>
| Notification | Upon determining a new question is warranted, the Census Bureau must notify Congress of its intent to add the question.  
The Census Bureau will publish a Federal Register Notice. |
| Testing | If the question is not currently used in an ongoing survey, the Census Bureau must test the wording of the new question. |
| Operational Adjustments | The Census Bureau must make operational adjustments to all data collection and processing systems to include the approved, new question. |
How a Question Becomes Part of the American Community Survey

Steps in the Process

Proposal
- A federal agency proposes a new or changed question.
- Request specifies frequency, geographic precision needed, and consideration of other sources.
- OMB and Census Bureau decide whether the change has merit.

Testing
- Wording options are created and tested.
- Question performance is evaluated in a field test.

Evaluation
- Test results are reviewed by the Census Bureau and requesting federal agency.
- The Census Bureau solicits public comment through a Federal Register Notice.

Decision
- A final decision is made in consultation with the OMB and Interagency Council on Statistical Policy Subcommittee on the ACS.
- If approved, the Census Bureau implements the change.
Subjects Planned for the 2020 Census
As submitted in March 2017

• No changes to the 2020 Census subjects
  • Same subjects included on the 2010 Census and Census 2000 short form

• 2020 Subjects
  • Operational (number of people) – asked since 1790
  • Age – asked since 1790
  • Gender – asked since 1790
  • Hispanic origin – asked since 1970
  • Race – asked since 1790
  • Relationship – asked since 1880
  • Tenure (owner/renter) – asked since 1890

Note: The 2020 Census short form will be administered in the 50 states, the District of Columbia, and Puerto Rico.
No changes to the ACS subjects.

<table>
<thead>
<tr>
<th>2020 Subjects</th>
<th>Social Subjects</th>
<th>Economic Subjects</th>
<th>Housing Subjects</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gender</td>
<td>Fertility (1890)</td>
<td>Income (1940)</td>
<td>Home Heating Fuel (1940)</td>
</tr>
<tr>
<td>Race/Ethnicity</td>
<td>Grandparent Caregivers (2000)</td>
<td>Industry of Worker (1820)</td>
<td>Home Value &amp; Rent (1940)</td>
</tr>
<tr>
<td>Relationship</td>
<td>Language Spoken at Home (1890)</td>
<td>Occupation of Worker (1850)</td>
<td>Plumbing Facilities (1940)</td>
</tr>
<tr>
<td>Tenure</td>
<td>Marital Status (1880)</td>
<td>Class of Worker (1910)</td>
<td>Kitchen Facilities (1940)</td>
</tr>
<tr>
<td></td>
<td>Marital History (1850)</td>
<td>Labor Force Status (1890)</td>
<td>Telephone Service (1960)</td>
</tr>
<tr>
<td>Migration/Residence One Year Ago (1930)</td>
<td>Work Status Last Year (1880)</td>
<td>Selected Monthly Owner Costs (1940-1990)</td>
<td>Utilities, mortgage, etc.</td>
</tr>
<tr>
<td>Place of Birth (1850)</td>
<td></td>
<td>SNAP (2005)</td>
<td>Food Stamps</td>
</tr>
<tr>
<td>Citizenship   (1820)</td>
<td></td>
<td>Units in Structure (1940)</td>
<td></td>
</tr>
<tr>
<td>Year of Entry (1890)</td>
<td></td>
<td>Rooms (1940)</td>
<td></td>
</tr>
<tr>
<td>School Enrollment (1850)</td>
<td></td>
<td>Bedrooms (1960)</td>
<td></td>
</tr>
<tr>
<td>Educational Attainment (1940)</td>
<td></td>
<td>Vehicles Available (1960)</td>
<td></td>
</tr>
<tr>
<td>Undergraduate Field of Degree (2009)</td>
<td></td>
<td>Year Built (1940)</td>
<td></td>
</tr>
<tr>
<td>Veteran Status (1890)</td>
<td></td>
<td>Year Moved In (1960)</td>
<td></td>
</tr>
<tr>
<td>Veteran Period of Service and VA Service-Connected Disability (2008)</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Note: The 2020 ACS (formerly the long form) will be administered in the 50 states, the District of Columbia, and Puerto Rico.
## Subjects Planned for the 2020 Island Areas Censuses

*As submitted in March 2017*

<table>
<thead>
<tr>
<th>2020 Subjects</th>
<th>Social Subjects</th>
<th>Economic Subjects</th>
<th>Housing Subjects</th>
</tr>
</thead>
<tbody>
<tr>
<td>Operational</td>
<td>Ancestry</td>
<td>Commuting</td>
<td>Acreage &amp; Agricultural Sales</td>
</tr>
<tr>
<td>Age</td>
<td>Disability</td>
<td>Health Insurance</td>
<td>Computer &amp; Internet Use</td>
</tr>
<tr>
<td>Gender</td>
<td>Fertility</td>
<td>Income</td>
<td>Home Heating Fuel</td>
</tr>
<tr>
<td>Race/Ethnicity</td>
<td>Grandparent Caregivers</td>
<td>Industry, Occupation, &amp; Class of Worker</td>
<td>Home Value &amp; Rent</td>
</tr>
<tr>
<td>Relationship</td>
<td>Language Spoken at Home</td>
<td>Labor Force Status</td>
<td>Plumbing Facilities, Kitchen Facilities, &amp; Telephone Service**</td>
</tr>
<tr>
<td>Tenure</td>
<td>Marital Status &amp; Marital History*</td>
<td>Work Status Last Year</td>
<td>Selected Monthly Owner Costs</td>
</tr>
<tr>
<td>Migration/Residence</td>
<td>Five Years Ago</td>
<td></td>
<td>Sewage Disposal</td>
</tr>
<tr>
<td>Parent’s Place of Birth</td>
<td></td>
<td></td>
<td>SNAP*</td>
</tr>
<tr>
<td>Place of Birth, Citizenship, &amp; Year of Entry</td>
<td></td>
<td></td>
<td>Source of Water</td>
</tr>
<tr>
<td>Reason for Migration</td>
<td></td>
<td></td>
<td>Units in Structure, Rooms, &amp; Bedrooms</td>
</tr>
<tr>
<td>School Enrollment, Educational Attainment &amp; Undergraduate Field of Degree***</td>
<td></td>
<td></td>
<td>Vehicles Available</td>
</tr>
<tr>
<td>Veteran Status, Period of Service, &amp; VA Service-Connected Disability Rating</td>
<td></td>
<td></td>
<td>Year Built &amp; Year Moved In</td>
</tr>
</tbody>
</table>

*New for Island Areas Censuses, but an established subject in the ACS.

**Propose including flush toilet availability.

***Propose including completion of a vocational program, which was a subject for the 2010 Census.

### Island Areas Censuses Only

Note: The 2020 Island Areas Censuses will be administered in American Samoa, the Commonwealth of the Northern Mariana Islands, Guam, and the U.S. Virgin Islands.
Questions Planned for the 2020 Census and American Community Survey

Document Outline

Contents:
• Introduction
• Questions Planned for the 2020 Census
• Questions Planned for the ACS
• Year First Included in a Decennial Census or on the ACS

Structure:
• Question image (paper form)
• Statement about why the question is asked (relationship to published data)
• Paragraph summarizing federal government use of data derived from the question
• Select summaries of types of community-level uses
Questions Planned for the 2020 Census

Question Images

- Age
- Gender
- Hispanic origin
- Race
- Relationship
- Tenure (owner/renter)
- Operational (number of people)
Age

Asked since 1790

Answers to the age and date of birth question provide the data that help us understand the size of different age groups and how other characteristics may vary by age.
Gender

*Asked since 1790*

A question about the gender of each person is used to create statistics about males and females and to present other data by gender.
Hispanic Origin*

* This Hispanic origin question will be implemented on the ACS in 2020.

Asked since 1970

A question about whether a person is of Hispanic, Latino, or Spanish origin is used to create statistics about this ethnic group.

Note: Hispanic origin and race are asked separately in accordance with the 1997 OMB standards on race and ethnicity.
Race*

Ask since 1790

A question about a person's race to create statistics about race and to present other estimates by race groups.

* This race question will be implemented on the ACS in 2020.

Note: Hispanic origin and race are asked separately in accordance with the 1997 OMB standards on race and ethnicity.
Relationship*

Asked since 1880

A question about the relationship of each person in a household to one central person is used to create estimates about families, households, and other groups, and to present other data at a household level.

*This relationship question will be implemented on the ACS in 2019.
Tenure (owner/renter)

*Asked since 1890*

A question about whether a home is owned or rented is used to create data about tenure, renters, and home ownership.
Operational (number of people)  

**Asked since 1790**

Some operational questions are asked to better administer the data collection process and to ensure greater accuracy of the data collected. Contact information is not part of published estimates and is carefully protected, as mandated by federal law, to respect the personal information of respondents.

---

- **How many people were living or staying in this house, apartment, or mobile home on April 1, 2020?**
  
  Number of people = □□□

- **Were there any additional people staying here on April 1, 2020 that you did not include in Question 1?**
  
  - [ ] Children, related or unrelated, such as newborn babies, grandchildren, or foster children
  - [ ] Relatives, such as adult children, cousins, or in-laws
  - [ ] Nonrelatives, such as roommates or live-in babysitters
  - [ ] People staying here temporarily
  - [ ] No additional people

- **What is your telephone number?**

  We will only contact you if needed for official Census Bureau business.

  Telephone Number □□□□□□

- **Please provide information for each person living here. If there is someone living here who pays the rent or owns this residence, start by listing him or her as Person 1. If the owner or the person who pays the rent does not live here, start by listing any adult living here as Person 1.**

  - **What is Person 1’s name? Print name below.**
    
    First Name □□□□□□ □ □ MI
    Last Name(s) □□□□□□ □□□

  - **Does this person usually live or stay somewhere else?**

    Mark [X] all that apply.

    - [ ] No
    - [ ] Yes, for college
    - [ ] Yes, for a military assignment
    - [ ] Yes, for a job or business
    - [ ] Yes, in a nursing home
    - [ ] Yes, with a parent or other relative
    - [ ] Yes, at a seasonal or second residence
    - [ ] Yes, in a jail or prison
    - [ ] Yes, for another reason
Questions Planned for the 2020 American Community Survey

• Based on results of the 2016 ACS Content Test, changes to the questions about the following topics are planned for implementation on the 2019 ACS (and will be carried forward to the 2020 ACS):
  • Telephone service
  • Journey to work
  • Weeks worked
  • Class of worker
  • Industry and Occupation
  • Retirement income
  • Relationship
  • Health insurance premiums and subsidies (new question)

• The ACS will implement the version of the race and Hispanic origin questions used on the 2020 Census on the 2020 ACS.
## Preparing the Questions Planned for the 2020 Census and American Community Survey

### Planned Timeline

<table>
<thead>
<tr>
<th>Activity</th>
<th>Timeline</th>
</tr>
</thead>
<tbody>
<tr>
<td>✓ Federal agencies provide updates to Federal use documentation</td>
<td>March – June 2016</td>
</tr>
<tr>
<td>✓ Incorporate feedback into draft <em>Planned Subjects</em> document</td>
<td>May – September 2016</td>
</tr>
<tr>
<td>✓ Provide updates and conduct briefings</td>
<td>January – March 2017</td>
</tr>
<tr>
<td>✓ <em>Planned Subjects</em> document delivered*</td>
<td>No later than March 31, 2017</td>
</tr>
<tr>
<td>✓ Draft <em>Planned Questions</em> document</td>
<td>September 2017 – January 2018</td>
</tr>
<tr>
<td>✓ Provide updates and conduct briefings</td>
<td>January – March 2018</td>
</tr>
<tr>
<td>✓ <em>Planned Questions</em> document delivered*</td>
<td>No later than March 31, 2018</td>
</tr>
<tr>
<td>American Community Survey Federal Register Notices <em>(public comment period)</em></td>
<td>December 2017 – February 2018, March – April 2018</td>
</tr>
<tr>
<td>2020 Census Federal Register Notices <em>(public comment period)</em></td>
<td>May – July 2018, August – September 2018</td>
</tr>
</tbody>
</table>

*2020 Island Areas Censuses Subjects and Questions are submitted via letter in the same period.*
Outstanding Item

• On December 12, 2017, the Department of Justice requested that citizenship be added to the 2020 Census short form, stating:
  • These “data are critical to the Department’s enforcement of Section 2 of the Voting Rights Act and its important protections against racial discrimination in voting. To fully enforce those requirements, the Department needs a reliable calculation of the citizen voting-age population in localities where voting rights violations are alleged or suspected.”
• This request is currently under evaluation by the Department of Commerce.
2020 Census and ACS Questions

Document Development

2020 Census and ACS Subjects

2020 Census andACS Questions
Subjects and Questions Planned for the 2020 Census and ACS

Decennial Census Content Determination Process

Periodic Reviews of Existing Content

ACS Cognitive and Field Testing

Census Cognitive and Field Testing

Subjects Planned

Questions Planned

Questions Planned for 2000 Census

New: Grandparents as Caregivers
Removed: Sewage Disposal, Source of Water

Questions Planned for 2010 Census and ACS

New: Health Insurance Coverage, VA Service-Connected Disability Rating
Removed: Years of Military Service

Questions Planned for 2020 Census and ACS

New: Computer and Internet Use
Removed: Business on Property, Flush Toilets

Content Reviews Following ACS Implementation:
Program Review
OMB Request (Sunstein Memo)
ACS Program Review
Submission of the 2020 Census and American Community Survey Questions to Congress

Briefing for the Department of Commerce

March 6, 2018
2020 Census and American Community Survey Subjects and Questions Requirements

- Section 141(f) of the Census Act requires that the **subjects** included in the next census be submitted to Congress no later than 3 years before the census date.
  - This document was issued on **March 28, 2017**.

- The Census Act also requires that the **questions** included in the next census be submitted to Congress no later than 2 years before the census date.
  - A document that meets this requirement for the 2020 Census and the ACS will be submitted to Congress by **March 31, 2018**.
How a Question Becomes Part of the Census or American Community Survey

Standard Considerations

- The **determination of content** for the Decennial Census Program rests with the Secretary of Commerce.

- Requests undergo **legal, technical, and policy review** to determine whether the question should be included.

- If the question is not currently used in an ongoing survey, it is the Census Bureau standard **develop and test the wording** of the new question.

- The Census Bureau must **submit to Congress** the planned questions for the 2020 Census and American Community Survey by March 31, 2018.

- In compliance with the Paperwork Reduction Act, the Census Bureau will **publish a Federal Register Notice**.
Subjects Planned for the 2020 Census

As submitted in March 2017

• No changes to the 2020 Census subjects
  • Same subjects included on the 2010 Census and Census 2000 short form

• 2020 Subjects
  • Age – asked since 1790
  • Gender – asked since 1790
  • Hispanic origin – asked since 1970
  • Race – asked since 1790
  • Relationship – asked since 1880
  • Tenure (owner/renter) – asked since 1890
  • Operational (e.g., name) – asked since 1790

Note: The 2020 Census short form will be administered in the 50 states, the District of Columbia, and Puerto Rico.
Outstanding Item

• On December 12, 2017, the Department of Justice requested that citizenship be added to the 2020 Census short form, stating:
  • These “data are critical to the Department’s enforcement of Section 2 of the Voting Rights Act and its important protections against racial discrimination in voting. To fully enforce those requirements, the Department needs a reliable calculation of the citizen voting-age population in localities where voting rights violations are alleged or suspected.”
  • This request is currently under evaluation by the Department of Commerce.
Prepare and Deliver the Questions Planned for the 2020 Census and American Community Survey

Planned Schedule

<table>
<thead>
<tr>
<th>Sunday</th>
<th>Monday</th>
<th>Tuesday</th>
<th>Wednesday</th>
<th>Thursday</th>
<th>Friday</th>
<th>Saturday</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mar-4</td>
<td>Mar-5</td>
<td>Mar-6</td>
<td>Mar-7</td>
<td>Mar-8</td>
<td>Mar-9</td>
<td>Mar-10</td>
</tr>
</tbody>
</table>

*Document is Delivered*

*Final document layout takes 2-3 days. Printing takes 3 days.*
### Finalize and Deliver the Questions Planned for the 2020 Census and American Community Survey

**Planned Timeline**

<table>
<thead>
<tr>
<th>Activity</th>
<th>Timeline</th>
</tr>
</thead>
<tbody>
<tr>
<td>Finalize draft of the Planned Questions document</td>
<td>March 1, 2018</td>
</tr>
<tr>
<td>Present at the <strong>2020 Program Management Review</strong></td>
<td>January 26, 2018</td>
</tr>
<tr>
<td>Brief <strong>Census Executive Staff</strong></td>
<td>February 13, 2018</td>
</tr>
<tr>
<td>Brief the <strong>Office of Management and Budget</strong></td>
<td>February 22, 2018</td>
</tr>
<tr>
<td>Brief the <strong>Department of Commerce</strong></td>
<td>March 6, 2018</td>
</tr>
<tr>
<td>Brief the <strong>Interagency Council on Statistical Policy Subcommittee on the ACS</strong></td>
<td>March 14, 2018</td>
</tr>
<tr>
<td>Brief the <strong>Census Scientific Advisory Committee</strong></td>
<td>March 29, 2018</td>
</tr>
<tr>
<td>Brief the <strong>National Advisory Committee</strong></td>
<td>March-April 2018</td>
</tr>
<tr>
<td>Brief <strong>House and Senate Staffers</strong></td>
<td>April 2018</td>
</tr>
</tbody>
</table>

*2020 Island Areas Censuses Subjects and Questions are submitted via letter in the same period.*
Questions Planned for the 2020 Census and American Community Survey

Document Outline

Contents:
• Introduction
• Questions Planned for the 2020 Census
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Structure:
• Question image (paper form)
• Statement about why the question is asked (relationship to published data)
• Paragraph summarizing federal government use of data derived from the question
• Select summaries of types of community-level uses
Questions Planned for the 2020 Census

Question Images

- Age
- Gender
- Hispanic origin
- Race
- Relationship
- Tenure (owner/renter)
- Operational (number of people)
Age

Asked since 1790

Answers to the age and date of birth question provide the data that help us understand the size of different age groups and how other characteristics may vary by age.
Gender

*Asked since 1790*

A question about the gender of each person is used to create statistics about males and females and to present other data by gender.
**Hispanic Origin**

*Asked since 1970*

A question about whether a person is of Hispanic, Latino, or Spanish origin is used to create statistics about this ethnic group.

<p>| | | | | | | | | | | | | | |</p>
<table>
<thead>
<tr>
<th></th>
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<td></td>
</tr>
</tbody>
</table>

* This Hispanic origin question will be implemented on the ACS in 2020.

Note: Hispanic origin and race are asked separately in accordance with the 1997 OMB standards on race and ethnicity.
Race*

*This race question will be implemented on the ACS in 2020.

Asked since 1790

A question about a person’s race to create statistics about race and to present other estimates by race groups.

Note: Hispanic origin and race are asked separately in accordance with the 1997 OMB standards on race and ethnicity.
Relationship*

*This relationship question will be implemented on the ACS in 2019.

Asked since 1880

A question about the relationship of each person in a household to one central person is used to create estimates about families, households, and other groups, and to present other data at a household level.
Tenure (owner/renter)

Asked since 1890

A question about whether a home is owned or rented is used to create data about tenure, renters, and home ownership.
Operational

Asked since 1790

Some operational questions are asked to better administer the data collection process and to ensure greater accuracy of the data collected. Contact information is not part of published estimates and is carefully protected, as mandated by federal law, to respect the personal information of respondents.

How many people were living or staying in this house, apartment, or mobile home on April 1, 2020?

Number of people =

Were there any additional people staying here on April 1, 2020 that you did not include in Question 1?

Mark ✔ all that apply.
- Children, related or unrelated, such as newborn babies, grandchildren, or foster children
- Relatives, such as adult children, cousins, or in-laws
- Nonrelatives, such as roommates or live-in babysitters
- People staying here temporarily
- No additional people

What is your telephone number?

We will only contact you if needed for official Census Bureau business.

Telephone Number

Please provide information for each person living here. If there is someone living here who pays the rent or owns this residence, start by listing him or her as Person 1. If the owner or the person who pays the rent does not live here, start by listing any adult living here as Person 1.

What is Person 1’s name? Print name below.

First Name

MI

Last Name(s)

Does this person usually live or stay somewhere else?

Mark ✔ all that apply.
- Yes, no
- Yes, for college
- Yes, for a military assignment
- Yes, for a job or business
- Yes, in a nursing home
- Yes, with a parent or other relative
- Yes, at a seasonal or second residence
- Yes, in jail or prison
- Yes, for another reason
Subjects Planned for the 2020 American Community Survey
As submitted in March 2017

No changes to the ACS subjects. (Year first asked in the Decennial Census Program)

<table>
<thead>
<tr>
<th>2020 Subjects</th>
<th>Social Subjects</th>
<th>Economic Subjects</th>
<th>Housing Subjects</th>
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<tbody>
<tr>
<td>Gender</td>
<td>Fertility (1890)</td>
<td>Income (1940)</td>
<td>Home Heating Fuel (1940)</td>
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<td>Race/Ethnicity</td>
<td>Grandparent Caregivers (2000)</td>
<td>Industry of Worker (1820)</td>
<td>Home Value &amp; Rent (1940)</td>
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<td>Relationship</td>
<td>Language Spoken at Home (1890)</td>
<td>Occupation of Worker (1850)</td>
<td>Plumbing Facilities (1940)</td>
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<td>Tenure</td>
<td>Marital Status (1880)</td>
<td>Class of Worker (1910)</td>
<td>Kitchen Facilities (1940)</td>
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<td>Migration/Residence One Year Ago (1930)</td>
<td>Work Status Last Year (1880)</td>
<td>Selected Monthly Owner Costs (1940-1990)</td>
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<td>Place of Birth (1850)</td>
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<td>Service-Connected Disability (2008)</td>
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</table>

Note: The 2020 ACS (formerly the long form) will be administered in the 50 states, the District of Columbia, and Puerto Rico. The 2020 Island Areas Censuses will use the 2020 ACS as a base, which will be modified to better meet the needs of the Island Areas.
Questions Planned for the 2020 American Community Survey

- Based on results of the 2016 ACS Content Test, changes to the questions about the following topics are planned for implementation on the 2019 ACS (and will be carried forward to the 2020 ACS):
  - Telephone service
  - Journey to work
  - Weeks worked
  - Class of worker
  - Industry and Occupation
  - Retirement income
  - Relationship
  - Health insurance premiums and subsidies (new question)

- The ACS will implement the version of the race and Hispanic origin questions used on the 2020 Census on the 2020 ACS.
Questions?
## Subjects and Questions Planned for the 2020 Census and ACS

### Decennial Census Content Determination Process

<table>
<thead>
<tr>
<th>Periodic Reviews of Existing Content</th>
<th>ACS Cognitive and Field Testing</th>
<th>Census Cognitive and Field Testing</th>
<th>Subjects Planned</th>
<th>Questions Planned</th>
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<tbody>
<tr>
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</table>

#### Questions Planned for 2000 Census
- **New:** Grandparents as Caregivers
- **Removed:** Sewage Disposal, Source of Water

#### Questions Planned for 2010 Census and ACS
- **New:** Health Insurance Coverage, VA Service-Connected Disability Rating
- **Removed:** Years of Military Service

#### Questions Planned for 2020 Census and ACS
- **New:** Computer and Internet Use
- **Removed:** Business on Property, Flush Toilets

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**Content Reviews Following ACS Implementation:**
- Program Review
- OMB Request (Sunstein Memo)
- ACS Program Review

---

**Notes:**
- The dates and content reviews are pre-decisional and subject to change.
- The chart provides an overview of the content planning process for the 2000, 2010, and 2020 censuses.
### Comparison of 2010 ACS and 2010 Decennial Census Response Rates by 2010 Numident Citizenship Status

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<th>Numident Status</th>
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**Sources:** 2010 ACS 1-year file and 2010 Decennial Census Unedited File (CUF), first mailout responses only.

**Notes:** Unweighted percentages. The sample size is 929,000 households. Standard errors below response rates. DRB clearance CBDRB-2017-CDAR-001. Difference in difference is -5.1 with a standard error of 0.26 (N=929,000).
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ofuelinc  0.0014  0.0005  0.0008  0.0005  0.0005  0.0008  0.0011  0.0011  0.0018
ofuelpay  0.0038  0.0007  0.0012  0.0015  0.0011  0.0018  0.0040  0.0028  0.0046  0.0019  0.0019
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periodofservice  0.0073  0.0012  0.0020  0.0136  0.0037  0.0061  0.0129  0.0038  0.0063  0.0131  0.0131
pin  0.0011  0.0004  0.0007  0.0033  0.0019  0.0031  0.0000  0.0192  0.0099
placeofbirth  0.4475  0.0091  0.0150  0.7656  0.0255  0.0419  0.9614  0.0388  0.0638  0.2188  0.0418
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propvalue  0.0744  0.0033  0.0054  0.0883  0.0082  0.0135  0.1286  0.0154  0.0253  0.0178  0.0140
pselect  1.3214  0.0156  0.0257  2.0959  0.0419  0.0689  2.5070  0.0656  0.1079  0.4710  0.0848
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## ACS Item Allocation Rates for United States: 2016,

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Source: ACS 1-year data. See following links for more information:
https://www.census.gov/programs-surveys/acs/methodology/sample-size-and-data-quality/item-a

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allocation-rates-definitions.html
Percent of ACS Response by Mode: 2010-2017

* 2017 data are preliminary
### Response Rates and Rea

<table>
<thead>
<tr>
<th>Year</th>
<th>Housing Unit Response Rate</th>
<th>Refusal</th>
<th>Unable to Locate</th>
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</thead>
<tbody>
<tr>
<td>2016</td>
<td>94.7</td>
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<tr>
<td>2015</td>
<td>95.8</td>
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<tr>
<td>2014</td>
<td>96.7</td>
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<tr>
<td>2013</td>
<td>89.9</td>
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<tr>
<td>2012</td>
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<tr>
<td>2011</td>
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### Group Quarters (Person) Response Rates and Rea

<table>
<thead>
<tr>
<th>Year</th>
<th>Group Quarters (Person) Response Rate</th>
<th>GQ Person Refusal</th>
<th>Unable to Locate GQ Person</th>
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<td>2006</td>
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</table>

**Note:** As a result of the 2013 government shutdown, the ACS did not have a second mailing (States, paper questionnaire in Puerto Rico) contribute to the overall response for this pane housing unit response rate rises to 97.1%. Similarly, due to a reduction in funding in 2004, response rate.
a telephone followup, or a person followup operation for the October 2013 housing unit panel. Or
el. This caused a drop in the annual housing unit response rate of about 7 percentage points. If we ex
the telephone and personal visit followup operations for the January 2004 panel were dropped, whic

### Reasons for Noninterviews (in percent) - Housing Units - United States

<table>
<thead>
<tr>
<th>No One Home</th>
<th>Temporarily Absent</th>
<th>Language Problem</th>
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### Reasons for Noninterviews (in percent) - Group Quarters - United States

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<th>GQ Person Other</th>
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### States

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<th>Maximum Contact Attempts Reached</th>
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### d States

<table>
<thead>
<tr>
<th>Whole GQ Refusal</th>
<th>Whole GQ Other</th>
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<td>0.9</td>
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<td>0.2</td>
</tr>
</tbody>
</table>

*Only respondents from the first mailing (Internet in the United States) were included in the October panel from the calculation, the annual change resulted in a comparable effect on the overall 2004.*
People are our most important resource. This Census Bureau survey collects information about education, employment, income, and housing—information your community uses to plan and fund programs. Your response is important, and we keep your answers confidential.

Start Here

This form asks for three types of information:
- basic information about the people who are living or staying at the address on the mailing label above
- specific information about this house, apartment, or mobile home
- more detailed information about each person living or staying here

What is your name? Please PRINT the name of the person who is filling out this form. Include the telephone number so we can contact you if there is a question, and today's date.

Last Name
First Name
MI
Area Code + Number

Date (Month/Day/Year)

How many people are living or staying at this address?
Number of people

Please turn to the next page to continue.
# List of Residents

**READ THESE INSTRUCTIONS FIRST**

Please fill out this form as soon as possible after receiving it in the mail.

- **LIST everyone who is living or staying here for more than 2 months.**
- **LIST anyone else staying here who does not have another usual place to stay.**
- **DO NOT LIST anyone who is living somewhere else for more than 2 months, such as a college student living away.**

**If this place is a vacation home or a temporary residence where no one in this household stays for more than 2 months, do not list any names in the List of Residents. Complete only pages 4, 5, and 6 and return the form.**

**IF YOU ARE NOT SURE WHAT TO LIST, CALL 1-800-321-7271.**

---

<table>
<thead>
<tr>
<th>Person 1</th>
<th>Person 2</th>
<th>Person 3</th>
<th>Person 4</th>
<th>Person 5</th>
<th>Person 6</th>
<th>Person 7</th>
<th>Person 8</th>
</tr>
</thead>
<tbody>
<tr>
<td>Last Name (Please print)</td>
<td>Last Name (Please print)</td>
<td>Last Name (Please print)</td>
<td>Last Name (Please print)</td>
<td>Last Name (Please print)</td>
<td>Last Name (Please print)</td>
<td>Last Name (Please print)</td>
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<td>☐ Female</td>
<td>☐ Female</td>
<td>☐ Female</td>
<td>☐ Female</td>
</tr>
</tbody>
</table>

**What is this person’s sex?**

**What is this person’s date of birth and what is this person’s age?**

Print numbers in boxes.

- Month Day Year of birth
- Age (in years)

**How is this person related to Person 1?**

- Person 1 (Person 1 is the person living or staying here in whose name this house or apartment is owned, being bought, or rented; if there is no such person, start with the name of any adult living or staying here.)

- Relationship of Person 2 to Person 1:
  - Husband or wife
  - Son or daughter
  - Brother or sister
  - Father or mother
  - Grandchild
  - In-law
  - Other relative

- Relationship of Person 3 to Person 1:
  - Husband or wife
  - Son or daughter
  - Brother or sister
  - Father or mother
  - Grandchild
  - In-law
  - Other relative

- Relationship of Person 4 to Person 1:
  - Husband or wife
  - Son or daughter
  - Brother or sister
  - Father or mother
  - Grandchild
  - In-law
  - Other relative

- Relationship of Person 5 to Person 1:
  - Husband or wife
  - Son or daughter
  - Brother or sister
  - Father or mother
  - Grandchild
  - In-law
  - Other relative

- Relationship of Person 6 to Person 1:
  - Husband or wife
  - Son or daughter
  - Brother or sister
  - Father or mother
  - Grandchild
  - In-law
  - Other relative

- Relationship of Person 7 to Person 1:
  - Husband or wife
  - Son or daughter
  - Brother or sister
  - Father or mother
  - Grandchild
  - In-law
  - Other relative

- Relationship of Person 8 to Person 1:
  - Husband or wife
  - Son or daughter
  - Brother or sister
  - Father or mother
  - Grandchild
  - In-law
  - Other relative

---

> If there are more than five people, list them here. We may call you for more information about them.

> After you've created the List of Residents, answer the questions across the top of the page for the first five people on the list.
<table>
<thead>
<tr>
<th>Person 9</th>
<th>Person 10</th>
<th>Person 11</th>
<th>Person 12</th>
</tr>
</thead>
<tbody>
<tr>
<td>Last Name</td>
<td>Last Name</td>
<td>Last Name</td>
<td>Last Name</td>
</tr>
<tr>
<td>First Name</td>
<td>First Name</td>
<td>First Name</td>
<td>First Name</td>
</tr>
</tbody>
</table>

When you are finished, turn the page and continue with the Housing section.

000487
Housing

Please answer the following questions about the house, apartment, or mobile home at the address on the mailing label.

1. Which best describes this building? Include all apartments, flats, etc., even if vacant.
   - A mobile home
   - A one-family house detached from any other house
   - A one-family house attached to one or more houses
   - A building with 2 apartments
   - A building with 3 or 4 apartments
   - A building with 5 to 9 apartments
   - A building with 10 to 19 apartments
   - A building with 20 to 49 apartments
   - A building with 50 or more apartments
   - Boat, RV, van, etc.

2. About when was this building first built?
   - 1999 or later
   - 1995 to 1998
   - 1990 to 1994
   - 1980 to 1989
   - 1970 to 1979
   - 1960 to 1969
   - 1950 to 1959
   - 1940 to 1949
   - 1939 or earlier

3. When did PERSON 1 (listed in the List of Residents on page 2) move into this house, apartment, or mobile home?
   - Month: __________ Year: ______

Answer questions 4-6 ONLY if this is a one-family house or a mobile home; otherwise, SKIP to question 7.

4. How many acres is this house or mobile home on?
   - Less than 1 acre → SKIP to question 6
   - 1 to 9.9 acres
   - 10 or more acres

5. IN THE PAST 12 MONTHS, what were the actual sales of all agricultural products from this property?
   - None
   - $1 to $999
   - $1,000 to $2,499
   - $2,500 to $4,999
   - $5,000 to $9,999
   - $10,000 or more

6. Is there a business (such as a store or barber shop) or a medical office on this property?
   - Yes
   - No

7. How many rooms are in this house, apartment, or mobile home? Do NOT count bathrooms, porches, balconies, foyers, halls, or half-rooms.
   - 1 room
   - 2 rooms
   - 3 rooms
   - 4 rooms
   - 5 rooms
   - 6 rooms
   - 7 rooms
   - 8 rooms
   - 9 or more rooms

8. How many bedrooms are in this house, apartment, or mobile home; that is, how many bedrooms would you list if this house, apartment, or mobile home were on the market for sale or rent?
   - No bedroom
   - 1 bedroom
   - 2 bedrooms
   - 3 bedrooms
   - 4 bedrooms
   - 5 or more bedrooms

9. Does this house, apartment, or mobile home have COMPLETE plumbing facilities; that is, 1) hot and cold piped water, 2) a flush toilet, and 3) a bathtub or shower?
   - Yes, has all three facilities
   - No

10. Does this house, apartment, or mobile home have COMPLETE kitchen facilities; that is, 1) a sink with piped water, 2) a stove or range, and 3) a refrigerator?
    - Yes, has all three facilities
    - No

11. Is there telephone service available in this house, apartment, or mobile home from which you can both make and receive calls?
    - Yes
    - No

12. How many automobiles, vans, and trucks of one-ton capacity or less are kept at the home for use by members of this household?
    - None
    - 1
    - 2
    - 3
    - 4
    - 5
    - 6 or more
## Housing (continued)

### 13. Which FUEL is used MOST for heating this house, apartment, or mobile home?
- Gas: from underground pipes serving the neighborhood
- Gas: bottled, tank, or LP
- Electricity
- Fuel oil, kerosene, etc.
- Coal or coke
- Wood
- Solar energy
- Other fuel
- No fuel used

### 14. a. LAST MONTH, what was the cost of electricity for this house, apartment, or mobile home?
- Last month's cost – Dollars
  - $0.00

### 15. d. IN THE PAST 12 MONTHS, what was the cost of oil, coal, kerosene, wood, etc., for this house, apartment, or mobile home? If you have lived here less than 12 months, estimate the cost.
- Past 12 months' cost – Dollars
  - $0.00

### 16. Is this house, apartment, or mobile home –
- Owned by you or someone in this household with a mortgage or loan?
- Owned by you or someone in this household free and clear (without a mortgage or loan)?
- Rented for cash rent?
- Occupied without payment of cash rent? Skip to question 21

### 17. a. What is the monthly rent for this house, apartment, or mobile home?
- Monthly amount – Dollars
  - $0.00

### 18. b. Does the monthly rent include any meals?
- Yes
- No

### 19. a. Is the rent on this house, apartment, or mobile home reduced because the Federal, state, or local government is paying part of the cost?
- Yes
- No → Skip to question 21

### 20. b. What government program provides this reduced rent?
- The "Section 8" program
- Some other government program
- Not sure

### 21. a. Is this house, apartment, or mobile home in a public housing project? That is, is it part of a government housing project for persons with low income?
- Yes
- No
Housing (continued)

22. What is the value of this property; that is, how much do you think this house and lot, apartment, or mobile home and lot, would sell for if it were for sale?

☐ Less than $10,000
☐ $10,000 to $14,999
☐ $15,000 to $19,999
☐ $20,000 to $24,999
☐ $25,000 to $29,999
☐ $30,000 to $34,999
☐ $35,000 to $39,999
☐ $40,000 to $49,999
☐ $50,000 to $59,999
☐ $60,000 to $69,999
☐ $70,000 to $79,999
☐ $80,000 to $89,999
☐ $90,000 to $99,999
☐ $100,000 to $124,999
☐ $125,000 to $149,999
☐ $150,000 to $174,999
☐ $175,000 to $199,999
☐ $200,000 to $249,999
☐ $250,000 or more – Specify

23. What are the annual real estate taxes on THIS property?

Annual amount – Dollars

☐ $0.00

☐ None

24. What is the annual payment for fire, hazard, and flood insurance on THIS property?

Annual amount – Dollars

☐ $0.00

☐ None

25. a. Do you or any member of this household have a mortgage, deed of trust, contract to purchase, or similar debt on THIS property?

☐ Yes, mortgage, deed of trust, or similar debt
☐ Yes, contract to purchase
☐ No → SKIP to question 26a

b. How much is the regular monthly mortgage payment on THIS property?

Monthly amount – Dollars

☐ $0.00

OR

☐ No regular payment required → SKIP to question 26a

26. a. Does the regular monthly mortgage payment include payments for real estate taxes on THIS property?

☐ Yes, taxes included in mortgage payment
☐ No, taxes paid separately or not required

b. Does the regular monthly mortgage payment include payments for fire, hazard, or flood insurance on THIS property?

☐ Yes, insurance included in mortgage payment
☐ No, insurance paid separately or not required

27. a. Do you or any member of this household have an installment loan or contract on THIS mobile home?

☐ Yes
☐ No

b. What are the total annual costs for installment loan payments, personal property taxes, site rent, registration fees, and license fees on THIS mobile home and site? Exclude real estate taxes.

Annual costs – Dollars

☐ $0.00

28. Answer questions 28a-c ONLY if you listed at least one person on page 2. Otherwise, SKIP to page 24 for the mailing instructions.

a. Do all of the persons listed on pages 2 and 3 live at this address year round?

☐ Yes → SKIP to the questions for Person 1 on the next page
☐ No

b. Of the persons listed on pages 2 and 3, how many live somewhere else part of the year?

☐ All persons listed
☐ Some persons

Person(s)

☐ Primary residence?
☐ Vacation home?
☐ School residence?
☐ Work residence?
☐ Other – Specify

29. Continue with the questions about PERSON 1 on the next page.
Person 1

Please copy the name of Person 1 from the List of Residents on page 2, then continue answering questions below.

Last Name

First Name

MI

Where was this person born?

☐ in the United States – Print name of state.

☐ Outside the United States – Print name of foreign country, or Puerto Rico, Guam, etc.

Is this person a CITIZEN of the United States?

☐ Yes, born in the United States – SKIP to 10a

☐ Yes, born in Puerto Rico, Guam, the U.S. Virgin Islands, or Northern Mariana Islands

☐ Yes, born abroad of American parent or parents

☐ Yes, U.S. citizen by naturalization

☐ No, not a citizen of the United States

When did this person come to live in the United States? Print numbers in boxes.

Year

a. At any time in the last 3 months, has this person attended regular school or college?

Include only nursery or preschool, kindergarten, elementary school, and schooling which leads to a high school diploma or a college degree.

☐ No, has not attended in the last 3 months – SKIP to question 11

☐ Yes, public school, public college

☐ Yes, private school, private college

b. What grade or level was this person attending? Mark (X) ONE box.

☐ Nursery school, preschool

☐ Kindergarten

☐ Grade 1 to grade 4

☐ Grade 5 to grade 8

☐ Grade 9 to grade 12

☐ College undergraduate years (freshman to senior)

☐ Graduate or professional school (for example: medical, dental, or law school)

What is the highest degree or level of school this person has COMPLETED? Mark (X) ONE box.

☐ No schooling completed

☐ Nursery school to 4th grade

☐ 5th grade or 6th grade

☐ 7th grade or 8th grade

☐ 9th grade

☐ 10th grade

☐ 11th grade

☐ 12th grade = NO DIPLOMA

☐ HIGH SCHOOL GRADUATE – high school DIPLOMA or the equivalent (for example: GED)

☐ Some college credit, but less than 1 year

☐ 1 or more years of college, no degree

☐ Associate degree (for example: AA, AS)

☐ Bachelor’s degree (for example: BA, AB, BS)

☐ Master’s degree (for example: MA, MS, MEng, MED, MSW, MBA)

☐ Professional degree (for example: MD, DDS, DVM, LLB, JD)

☐ Doctorate degree (for example: PhD, EdD)

c. Did this person live inside the limits of the city or town?

☐ Yes

☐ No, outside the city or town limits

Name of city, town, or post office

If this person is UNDER 5 years of age, SKIP to the questions for PERSON 2 on page 16. Otherwise, continue with question 14.

a. Does this person speak a language other than English at home?

☐ Yes

☐ No – SKIP to question 15

b. What is this language?

For example: Korean, Italian, Spanish, Vietnamese

How well does this person speak English?

☐ Very well

☐ Not very well

☐ Well

☐ Not at all

Does this person have any of the following long-lasting conditions?

☐ Blindness, deafness, or a severe vision or hearing impairment?

☐ Yes

☐ No

☐ A condition that substantially limits one or more basic physical activities such as walking, climbing stairs, reaching, lifting, or carrying?

☐ Yes

☐ No

Because of a physical, mental, or emotional condition lasting 6 months or more, does this person have any difficulty in doing any of the following activities?

☐ Learning, remembering, or concentrating?

☐ Yes

☐ No

☐ Dressing, bathing, or getting around inside the home?

☐ Yes

☐ No

☐ Answer if this person is 16 YEARS OLD OR OVER. Going outside the home alone to shop or visit a doctor’s office?

☐ Yes

☐ No

☐ Answer if this person is 16 YEARS OLD OR OVER. Working at a job or business?

☐ Yes

☐ No
### Person 1 (continued)

**6.** If this person is UNDER 15 years of age, **SKIP** to the questions for PERSON 2 on page 10. Otherwise, continue with **11.**

**11.** Answer question 17 ONLY if this person is female and 15–50 years old. Otherwise, **SKIP** to question 18a.

**17.** Has this person given birth to any children in the past 12 months?

- [ ] Yes
- [ ] No

**18a.** Does this person have any of his/her own grandchildren under the age of 18 living in this house or apartment?

- [ ] Yes
- [ ] No → **SKIP** to question 19

**18b.** Is this grandparent currently responsible for most of the basic needs of any grandchild(ren) under the age of 18 who live(s) in this house or apartment?

- [ ] Yes
- [ ] No → **SKIP** to question 19

**19.** How long has this grandparent been responsible for the(see) grandchild(ren)? If the grandparent is financially responsible for more than one grandchild, answer the question for the grandchild for whom the grandparent has been responsible for the longest period of time.

- [ ] Less than 6 months
- [ ] 6 to 11 months
- [ ] 1 or 2 years
- [ ] 3 or 4 years
- [ ] 5 or more years

**20.** When did this person serve on active duty in the U.S. Armed Forces? Mark (X) a box for EACH period in which this person served.

- [ ] April 1995 or later
- [ ] August 1990 to March 1995 (including Persian Gulf War)
- [ ] September 1980 to July 1990
- [ ] May 1975 to August 1980
- [ ] Vietnam era (August 1964 to April 1975)
- [ ] February 1955 to July 1964
- [ ] Korean War (June 1950 to January 1955)
- [ ] World War II (September 1940 to July 1947)
- [ ] Some other time

**21.** In total, how many years of active-duty military service has this person had?

- [ ] Less than 2 years
- [ ] 2 years or more

**22.** LAST WEEK, did this person do ANY work for either pay or profit? Mark (X) the "Yes" box even if the person worked only 1 hour, or helped without pay in a family business or farm for 15 hours or more, or was on active duty in the Armed Forces.

- [ ] Yes
- [ ] No → **SKIP** to question 28

**23.** At what location did this person work LAST WEEK?

- If the exact address is not known, give a description of the location such as the building name or the nearest street or intersection.
- [ ] Address (Number and street name):

**24.** How did this person usually get to work LAST WEEK? If this person usually used more than one method of transportation during the trip, mark (X) the box of the one used for most of the distance.

- [ ] Car, truck, or van
- [ ] Bus or trolley bus
- [ ] Streetcar or trolley car
- [ ] Subway or elevated
- [ ] Railroad
- [ ] Ferryboat
- [ ] Taxi
- [ ] Motorcycle
- [ ] Bicycle
- [ ] Walked
- [ ] Worked at home (will be **SKIP** to question 22)
- [ ] Other method

**25.** How many people, including this person, usually rode to work in the car, truck, or van LAST WEEK?

- Person(s):

**26.** What time did this person usually leave home to go to work LAST WEEK?

- Hour: _____________
- Minute: _____________
- a.m. or p.m.

**27.** How many minutes did it usually take this person to get from home to work LAST WEEK?

- Minutes: _____________

**28.** Answer questions 29–31 ONLY if this person did NOT work last week. Otherwise, **SKIP** to question 32.

**29a.** LAST WEEK, was this person on layoff from a job?

- [ ] Yes → **SKIP** to question 28c
- [ ] No

**29b.** LAST WEEK, was this person TEMPORARILY absent from a job or business?

- [ ] Yes, on vacation, temporary illness, labor dispute, etc. → **SKIP** to question 31
- [ ] No → **SKIP** to question 31

**29c.** Has this person been informed that he or she will be recalled to work within the next 6 months or been given a date to return to work?

- [ ] Yes → **SKIP** to question 30
- [ ] No
Person 1 (continued)

29. Has this person been looking for work during the last 4 weeks?
   □ Yes
   □ No → SKIP to question 31

30. LAST WEEK, could this person have started a job if offered one, or returned to work if recalled?
   □ Yes, could have gone to work
   □ No, because of own temporary illness
   □ No, because of all other reasons (in school, etc.) → SKIP to question 40

31. When did this person last work, even for a few days?
   □ Within the past 12 months
   □ 1 to 5 years ago → SKIP to question 34
   □ Over 5 years ago or never worked → SKIP to question 40

32. During the PAST 12 MONTHS, how many WEEKS did this person work? Count paid vacation, paid sick leave, and military service.
   Weeks:

33. During the PAST 12 MONTHS, in the WEEKS WORKED, how many hours did this person usually work each WEEK?
   Usual hours worked each WEEK:

34. Answer questions 34-39 ONLY IF this person worked in the past 5 years. Otherwise, SKIP to question 40.

34-39 CURRENT OR MOST RECENT JOB ACTIVITY. Describe clearly this person’s chief job activity or business last week. If this person had more than one job, describe the one at which this person worked the most hours. If this person had no job or business last week, give information for highest last job or business.

35. Was this person —
   Mark (X) ONE box.
   □ an employee of a PRIVATE FOR PROFIT company or business, or of an individual, for wages, salary, or commissions?
   □ an employee of a PRIVATE NOT FOR PROFIT, tax exempt, or charitable organization?
   □ a local GOVERNMENT employees (city, county, etc.)?
   □ a state GOVERNMENT employee?
   □ a Federal GOVERNMENT employees?
   □ SELF-EMPLOYED in own NOT INCORPORATED business, professional practice, or farm?
   □ SELF-EMPLOYED in own INCORPORATED business, professional practice, or farm?
   □ working WITHOUT PAY in family business or farm?

36. For whom did this person work?
   For now on active duty in the Armed Forces, mark (X) this box → and print the branch of the Armed Forces.
   Name of company, business, or other employer:

37. What kind of business or industry was this?
   Describe the activity at the location where employed. (For example: hospital, newspaper publishing, mail order house, auto engine manufacturing, bank)

38. Is this mainly — Mark (X) one box.
   □ manufacturing?
   □ wholesale trade?
   □ retail trade?
   □ other (agriculture, construction, service, government, etc.)?

39. What kind of work was this person doing? (For example: patient care, directing hiring policies, supervising order clerks, typing and filing, reconciling financial records)

40. INCOME IN THE PAST 12 MONTHS.
   Mark (X) the “Yes” box for each type of income this person received, and give your best estimate of the TOTAL AMOUNT during the PAST 12 MONTHS.
   (Note: The “past 12 months” is the period from today’s date one year ago up through today.)
   Mark (X) the “No” box to show types of income NOT received.
   If net income was a loss, mark the “Loss” box to the right of the dollar amount.
   For income received jointly, report the appropriate share for each person — or, if that’s not possible, report the whole amount for only one person and mark the “No” box for the other person.

   a. Wages, salary, commissions, bonuses, or tips from all jobs, report amount before deductions for taxes, bonds, dues, or other items.

   □ Yes → $ __________
   □ No → TOTAL AMOUNT for past 12 MONTHS

41. b. Self-employment income from own nonfarm businesses or farm businesses, including proprietorships and partnerships. Report NET income after business expenses.
   □ Yes → $ __________
   □ No → TOTAL AMOUNT for past 12 MONTHS

   c. Interest, dividends, net rental income, royalty income, or income from estates and trusts. Report even small amounts credited to an account.
   □ Yes → $ __________
   □ No → TOTAL AMOUNT for past 12 MONTHS

   d. Social Security or Railroad Retirement.
   □ Yes → $ __________
   □ No → TOTAL AMOUNT for past 12 MONTHS

   e. Supplemental Security Income (SSI).
   □ Yes → $ __________
   □ No → TOTAL AMOUNT for past 12 MONTHS

   f. Any public assistance or welfare payments from the state or local welfare office.
   □ Yes → $ __________
   □ No → TOTAL AMOUNT for past 12 MONTHS

   g. Retirement, survivor, or disability pensions. Do NOT include Social Security.
   □ Yes → $ __________
   □ No → TOTAL AMOUNT for past 12 MONTHS

   h. Any other sources of income received regularly such as Veterans’ (VA) payments, unemployment compensation, child support or alimony. Do NOT include lump sum payments such as money from an inheritance or the sale of a home.
   □ Yes → $ __________
   □ No → TOTAL AMOUNT for past 12 MONTHS

42. h. What was this person’s total income during the PAST 12 MONTHS? Add entries in questions 40a to 40h; subtract any losses. If net income was a loss, enter the amount and mark (X) the “Loss” box next to the dollar amount.
   □ None or $ __________
   □ Loss → TOTAL AMOUNT for past 12 MONTHS

43. Continue with the questions for Person 2 on the next page. If only 1 person is listed in the List of Residents, SKIP to page 24 for mailing instructions.
Survey information helps your community get financial assistance for roads, hospitals, schools, and more.

What is the highest degree or level of school this person has COMPLETED? Mark (X) ONE box. If currently enrolled, mark the previous grade or highest degree received.

- No schooling completed
- Nursery school to 4th grade
- 5th grade or 6th grade
- 7th grade or 8th grade
- 9th grade
- 10th grade
- 11th grade
- 12th grade – NO DIPLOMA
- HIGH SCHOOL GRADUATE – high school DIPLOMA or the equivalent (for example: GED)
- Some college credit, but less than 1 year
- 1 or more years of college, no degree
- Associate degree (for example: AA, AS)
- Bachelor's degree (for example: BA, AB, BS)
- Master's degree (for example: MA, MS, MEng, MEd, MSW, MBA)
- Professional degree (for example: MD, DDS, DVM, LLB, JD)
- Doctorate degree (for example: PhD, EdD)

What is this person's ancestry or ethnic origin?

(For example: Italian, Jamaican, African Am., Cambodian, Cape Verdean, Norwegian, Dominican, French Canadian, Haitian, Korean, Lebanese, Polish, Nigerian, Mexican, Taiwanese, Ukrainian, and so on.)

a. Did this person live in this house or apartment 1 year ago?
- Person is under 1 year old → SKIP to the questions for Person 3 on page 13
- Yes, this house → SKIP to in the next column
- No, outside the United States – Print name of foreign country, or Puerto Rico, Guam, etc. below, then SKIP to in the next column.

b. Where did this person live 1 year ago?

Name of city, town, or post office

c. Did this person live inside the limits of the city or town?
- Yes
- No, outside the city/town limits

Name of county

If this person is UNDER 5 years of age, SKIP to the questions for PERSON 3 on page 13. Otherwise, continue with question 14.

a. Does this person speak a language other than English at home?
- Yes
- No → SKIP to question 15

b. What is this language?

For example: Korean, Italian, Spanish, Vietnamese

c. How well does this person speak English?
- Very well
- Not well
- Well
- Not at all

Does this person have any of the following long-lasting conditions:

a. Blindness, deafness, or a severe vision or hearing impairment?
- Yes
- No

b. A condition that substantially limits one or more basic physical activities such as walking, climbing stairs, reaching, lifting, or carrying?

Because of a physical, mental, or emotional condition lasting 6 months or more, does this person have any difficulty in doing any of the following activities?

a. Learning, remembering, or concentrating?
- Yes
- No

b. Dressing, bathing, or getting around inside the home?

(Need to provide more context for the following activity when asking if this person is 16 YEARS OLD OR OVER)

c. (Answer if this person is 16 YEARS OLD OR OVER) Working at a job or business?
Person 2 (continued)

17. Has this person given birth to any children in the past 12 months?
   - Yes
   - No

18. a. Does this person have any of his/her own grandchildren under the age of 18 living in this house or apartment?
   - Yes
   - No → SKIP to question 19

   b. Is this grandparent currently responsible for most of the basic needs of any grandchild(ren) under the age of 18 who live(s) in this house or apartment?
   - Yes
   - No → SKIP to question 19

   c. How long has this grandparent been responsible for these grandchild(ren)? If the grandparent is financially responsible for more than one grandchild, answer the question for the grandchild for whom the grandparent has been responsible for the longest period of time.
   - Less than 6 months
   - 6 to 11 months
   - 12 or more
   - 3 or 4 years
   - 5 or more years

19. Has this person ever served on active duty in the U.S. Armed Forces, military Reserves, or National Guard? Active duty does not include training for the Reserves or National Guard, but DOES include activation, for example, for the Persian Gulf War.
   - Yes, now on active duty
   - Yes, on active duty in past, but not now
   - No, training for Reserves or National Guard only → SKIP to question 22
   - No, never served in the military → SKIP to question 22

20. When did this person serve on active duty in the U.S. Armed Forces? Mark (X) a box for EACH period in which this person served.
   - April 1995 or later
   - August 1990 to March 1995 (including Persian Gulf War)
   - September 1990 to July 1990
   - May 1975 to August 1980
   - Vietnam era (August 1964 to April 1975)
   - February 1955 to July 1964
   - Korean War (June 1950 to January 1955)
   - World War II (September 1940 to July 1947)
   - Some other time

21. In total, how many years of active-duty military service has this person had?
   - Less than 2 years
   - 2 years or more

22. LAST WEEK, did this person do ANY work for either pay or profit? Mark (X) the "Yes" box even if the person worked only 1 hour, or helped without pay in a family business or farm for 13 hours or more, or was on active duty in the Armed Forces.
   - Yes
   - No → SKIP to question 28

23. At what location did this person work LAST WEEK?
   - If this person worked at more than one location, print where he or she worked most last week.
   a. Address (Number and street name)
   b. Name of city, town, or post office
   c. Is the work location inside the limits of that city or town?
   - Yes
   - No, outside the city/town limits
   d. Name of county
   e. Name of U.S. state or foreign country
   f. ZIP Code

24. How did this person usually get to work LAST WEEK? If this person usually used more than one method of transportation during the trip, mark (X) the box of the one used for most of the distance.
   - Car, truck, or van
   - Bus or trolley bus
   - Streetcar or trolley car
   - Subway or elevated
   - Railroad
   - Ferryboat
   - Taxi or motorcycle
   - Bicycle
   - Walked
   - Worked at home → SKIP to question 32
   - Other method

25. Answer question 25 ONLY if you marked "Car, truck, or van" in question 24. Otherwise, SKIP to question 26.

26. How many people, including this person, usually rode to work in the car, truck, or van LAST WEEK?
   - Person(s):

27. What time did this person usually leave home to go to work LAST WEEK?
   - Hour: 00
   - Minute: 00
   - a.m.
   - p.m.

28. How many minutes did this person usually take to get from home to work LAST WEEK?
   - Minutes

29. Answer questions 28-31 ONLY if this person did NOT work last week. Otherwise, SKIP to question 32.

30. a. LAST WEEK, was this person on layoff from a job?
   - Yes → SKIP to question 28c
   - No

b. LAST WEEK, was this person TEMPORARILY absent from a job or business?
   - Yes, on vacation, temporary illness, labor dispute, etc. → SKIP to question 31
   - No → SKIP to question 29

31. c. Has this person been informed that he or she will be recalled to work within the next 6 months OR has been given a date to return to work?
   - Yes → SKIP to question 30
   - No
<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>29 Has this person been looking for work during the last 4 weeks?</td>
<td>Yes</td>
</tr>
<tr>
<td>30 LAST WEEK, could this person have started a job if offered one, or returned to work if recalled?</td>
<td>Yes</td>
</tr>
<tr>
<td>31 When did this person last work, even for a few days?</td>
<td>Within the past 12 months</td>
</tr>
<tr>
<td>32 During the PAST 12 MONTHS, how many WEEKS did this person work?</td>
<td>Count paid or unpaid work, including full or part-time work, and military service.</td>
</tr>
<tr>
<td>33 During the PAST 12 MONTHS, in the WEEKS worked, how many hours did this person usually work each WEEK?</td>
<td>Usual hours worked each WEEK</td>
</tr>
<tr>
<td>34 Was this person -</td>
<td>Mark (X) ONE box</td>
</tr>
<tr>
<td>35 For whom did this person work?</td>
<td>If now on active duty in the Armed Forces, mark (X) this box and print the branch of the Armed Forces.</td>
</tr>
<tr>
<td>36 What kind of business or industry was this?</td>
<td>Describe the activity at the location where employed. (For example: hospital, newspaper publishing, mail order house, auto engine manufacturing, bank)</td>
</tr>
<tr>
<td>37 Is this mainly -</td>
<td>Mark (X) one box.</td>
</tr>
<tr>
<td>38 What kind of work was this person doing?</td>
<td>(For example: registered nurse, personnel manager, supervisor of order department, secretary, accountant)</td>
</tr>
<tr>
<td>39 What were this person's most important activities or duties?</td>
<td>(For example: patient care, directing hiring policies, supervising clerks, typing and filing, reconciling financial records)</td>
</tr>
<tr>
<td>40 INCOME IN THE PAST 12 MONTHS.</td>
<td>Mark (X) the &quot;Yes&quot; box for each type of income this person received, and give your best estimate of the TOTAL AMOUNT during the PAST 12 MONTHS. (Note: The &quot;past 12 months&quot; is the period from today's date one year ago up through today.)</td>
</tr>
<tr>
<td>41 What was this person's total income during the PAST 12 MONTHS? Add entries in questions 40a to 40h; subtract any losses. If net income was a loss, enter the amount and mark (X) the &quot;Loss&quot; box next to the dollar amount.</td>
<td></td>
</tr>
<tr>
<td>42 Continue with the questions for Person 3 on the next page. If only 2 people are listed in the List of Residents, skip to page 24 for mailing instructions.</td>
<td></td>
</tr>
</tbody>
</table>
### Person 3 (continued)

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>G</strong> If this person is UNDER 15 years of age, skip to the questions for <strong>PERSON 4</strong> on page 16. Otherwise, continue with <strong>H</strong>.</td>
<td></td>
</tr>
<tr>
<td><strong>H</strong> Answer question 17 <strong>ONLY</strong> if this person is female and 15-50 years old. Otherwise, skip to question 18a.</td>
<td></td>
</tr>
<tr>
<td><strong>17</strong> Has this person given birth to any children in the past 12 months?</td>
<td></td>
</tr>
<tr>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td><strong>18a</strong> a. Does this person have any of his/her own grandchildren under the age of 18 living in this house or apartment?</td>
<td></td>
</tr>
<tr>
<td>Yes</td>
<td>No → SKIP to question 19</td>
</tr>
<tr>
<td><strong>18b</strong> b. Is this grandparent currently responsible for most of the basic needs of any grandchild(ren) under the age of 18 who lives(s) in this house or apartment?</td>
<td></td>
</tr>
<tr>
<td>Yes</td>
<td>No → SKIP to question 19</td>
</tr>
<tr>
<td><strong>19</strong> c. How long has this grandparent been responsible for the grandchild(ren)? If the grandparent is responsible for more than one grandchild, answer the question for the grandchild for whom the grandparent has been responsible for the longest period of time.</td>
<td></td>
</tr>
<tr>
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<td>6 to 11 months</td>
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<td><strong>21</strong> In total, how many years of active-duty military service has this person had?</td>
<td></td>
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<td></td>
</tr>
<tr>
<td>Yes</td>
<td>No → SKIP to question 28</td>
</tr>
<tr>
<td><strong>23</strong> At what location did this person work LAST WEEK? If this person worked at more than one location, print where he or she worked most last week.</td>
<td></td>
</tr>
<tr>
<td>a. Address (Number and street name)</td>
<td></td>
</tr>
<tr>
<td>b. Name of city, town, or post office</td>
<td></td>
</tr>
<tr>
<td>c. Is the work location inside the limits of that city or town?</td>
<td></td>
</tr>
<tr>
<td>Yes</td>
<td>No, outside the city limits</td>
</tr>
<tr>
<td><strong>24</strong> How did this person usually get to work LAST WEEK? If this person usually used more than one method of transportation during the trip, mark (X) the box of the one used for most of the distance.</td>
<td></td>
</tr>
<tr>
<td>Car, truck, or van</td>
<td>Bus or trolley bus</td>
</tr>
<tr>
<td><strong>25</strong> How many people, including this person, usually rode to work in the car, truck, or van LAST WEEK?</td>
<td></td>
</tr>
<tr>
<td>Person(s)</td>
<td></td>
</tr>
<tr>
<td><strong>26</strong> What time did this person usually leave home to go to work LAST WEEK?</td>
<td></td>
</tr>
<tr>
<td>Hour: Minute: a.m. p.m.</td>
<td></td>
</tr>
<tr>
<td><strong>27</strong> How many minutes did it usually take this person to get home from work LAST WEEK?</td>
<td></td>
</tr>
<tr>
<td>Minutes</td>
<td></td>
</tr>
<tr>
<td><strong>28</strong> Answer questions 28-31 <strong>ONLY</strong> if this person did NOT work last week. Otherwise, skip to question 32.</td>
<td></td>
</tr>
<tr>
<td><strong>29</strong> a. LAST WEEK, was this person on leave from a job?</td>
<td></td>
</tr>
<tr>
<td>Yes → SKIP to question 28c</td>
<td>No</td>
</tr>
<tr>
<td><strong>29b</strong> b. LAST WEEK, was this person TEMPORARILY absent from a job or business?</td>
<td></td>
</tr>
<tr>
<td>Yes, on vacation, temporary illness, labor dispute, etc. → SKIP to question 31</td>
<td>No → SKIP to question 29</td>
</tr>
<tr>
<td><strong>29c</strong> c. Has this person been informed that he or she will be recalled to work within the next 6 months or given a date to return to work?</td>
<td></td>
</tr>
<tr>
<td>Yes → SKIP to question 30</td>
<td>No</td>
</tr>
</tbody>
</table>
Person 3 (continued)

23. Has this person been looking for work during the last 4 weeks?
   ☐ Yes
   ☐ No → SKIP to question 31

30. LAST WEEK, could this person have started a job if offered one, or returned to work if recalled?
   ☐ Yes, could have gone to work
   ☐ No, because of own temporary illness
   ☐ No, because of all other reasons (in school, etc.)

32. During the PAST 12 MONTHS, how many hours did this person usually work each WEEK?
   ☐ Within the past 12 months
   ☐ 1 to 5 years ago → SKIP to question 34
   ☐ Over 5 years ago or never worked → SKIP to question 40

33. What kind of business or industry was this?
   Describe the activity at the location where employed. (For example: hospital, newspaper publishing, mail order house, auto engine manufacturing, bank)

36. Is this mainly a Mark (X) one box.
   ☐ manufacturing?
   ☐ who-sells trade?
   ☐ retail trade?
   ☐ other (agriculture, construction, service, government, etc.)

39. What kind of work was this person doing? (For example: registered nurse, personnel manager, supervisor of order department, secretary, accountant)

41. What were this person’s most important activities or duties? (For example: patient care, directing hiring policies, supervising order clerks, typing and filing, reconciling financial records)

43. INCOME IN THE PAST 12 MONTHS.
   Mark (X) the “Yes” box for each type of income this person received, and give your best estimate of the TOTAL AMOUNT during the PAST 12 MONTHS. (NOTE: The “past 12 months” is the period from today’s date one year ago up through today.)
   Mark (X) the “No” box to show types of income NOT received.
   If net income was a loss, mark the “Loss” box to the right of the dollar amount.
   For income received jointly, report the appropriate share for each person or, if that’s not possible, report the whole amount for only one person and mark the “No” box for the other person.

   a. Wages, salary, commissions, bonuses, or tips from all jobs. Report amount before deductions for taxes, bonds, dues, or other items.
      ☐ Yes
      ☐ No

   b. Self-employment income from own nonfarm businesses or farm businesses, including proprietorships and partnerships. Report NET income after business expenses.
      ☐ Yes
      ☐ No

   c. Interest, dividends, net rental income, royalty income, or income from estates and trusts. Report even small amounts credited to an account.
      ☐ Yes
      ☐ No

   d. Social Security or Railroad Retirement.
      ☐ Yes
      ☐ No

   e. Supplemental Security Income (SSI).
      ☐ Yes
      ☐ No

   f. Any public assistance or welfare payments from the state or local welfare office.
      ☐ Yes
      ☐ No

   g. Retirement, survivor, or disability pensions. Do NOT include Social Security.
      ☐ Yes
      ☐ No

   h. Any other sources of income received regularly such as Veterans’ (VA) payments, unemployment compensation, child support or alimony. Do NOT include lump sum payments such as money from an inheritance or the sale of a home.
      ☐ Yes
      ☐ No

47. What was this person’s total income during the PAST 12 MONTHS? Add entries in questions 40a to 40h; subtract any losses. If net income was a loss, enter the amount and mark (X) the “Loss” box next to the dollar amount.

48. Continue with the questions for Person 4 on the next page. If only 2 people are listed in the list of Residents, SKIP to page 24 for mailing instructions.

Note: 34-39 CURRENT OR MOST RECENT JOB ACTIVITY. Describe clearly this person’s chief job activity or business last week. If this person had more than one job, describe the one at which this person worked the most hours. If this person had no job or business last week, give information for their last job or business.

Yes X
☐ an employee of a PRIVATE FOR PROFIT company or business, or of an individual, for wages, salary, or commissions?
☐ an employee of a PRIVATE NOT FOR PROFIT, tax-exempt, or charitable organization?
☐ a local GOVERNMENT employee (city, county, etc.)?
☐ a state GOVERNMENT employee?
☐ a Federal GOVERNMENT employee?
☐ SELF-EMPLOYED in own INCORPORATED business, professional practice, or farm?
☐ SELF-EMPLOYED in own UNINCORPORATED business, professional practice, or farm?
☐ working WITHOUT PAY in family business or farm?
Knowing about age, race, and sex helps your community better meet the needs of everyone.

What is the highest degree or level of school this person has completed? Mark (X) ONE box.
- No schooling completed
- Nursery school to 4th grade
- 5th grade or 6th grade
- 7th grade or 8th grade
- 9th grade
- 10th grade
- 11th grade
- 12th grade - NO DIPLOMA
- HIGH SCHOOL GRADUATE - high school diploma or the equivalent (GED)
- Some college credit, but less than 1 year
- 1 or more years of college, no degree
- Associate degree (for example: AA, AS)
- Bachelor's degree (for example: BA, AB, BS)
- Master's degree (for example: MA, MS, ME, MEng, MEd, MSW, MBA)
- Professional degree (for example: MD, DDS, DVM, LLB, JD)
- Doctorate degree (for example: PhD, EdD)

What is this person's ancestry or ethnic origin?

(For example: Italian, Jamaican, African Am., Cambodian, Cape Verdien, Norwegian, Dominican, French Canadian, Haitian, Korean, Lebanese, Polish, Nigerian, Mexican, Taiwanese, Ukrainian, and so on.)

a. Did this person live in this house or apartment 1 year ago?
- No, has not attended in the last 3 months → SKIP to question 11
- Yes, public school, public college
- Yes, private school, private college

b. What grade or level was this person attending? Mark (X) ONE box.
- Nursery school, preschool
- Kindergarten
- Grade 1 to grade 4
- Grade 5 to grade 8
- Grade 9 to grade 12
- College undergraduate years (freshman to senior)
- Graduate or professional school (For example: medical, dental, or law school)

If this person is UNDER 5 years of age, SKIP to the questions for PERSON 5 on page 18. Otherwise, continue with question 14.

a. Does this person speak a language other than English at home?
- Yes
- No → SKIP to question 15
b. What is this language?

For example: Korean, Italian, Spanish, Vietnamese.

c. How well does this person speak English?
- Very well
- Not well
- Not at all

d. Does this person have any of the following long-lasting conditions?

a. Blindness, deafness, or a severe vision or hearing impairment?
- Yes
- No

b. A condition that substantially limits one or more basic physical activities such as walking, climbing stairs, reaching, lifting, or carrying?
- Yes
- No

d. Because of a physical, mental, or emotional condition lasting 6 months or more, does this person have any difficulty in doing any of the following activities?

a. Learning, remembering, or concentrating?
- Yes
- No

b. Dressing, bathing, or getting around inside the home?
- Yes
- No

c. (Answer if this person is 16 YEARS OLD OR OVER.) Going outside the home alone to shop or visit a doctor's office?
- Yes
- No

d. (Answer if this person is 16 YEARS OLD OR OVER.) Working at a job or business?
- Yes
- No
### Person 4 (continued)

#### G. If this person is UNDER 18 years of age, answer questions for PERSON 5 on page 19. Otherwise, continue with H.

#### H. Answer question 17 ONLY if this person is female and 15-59 years old. Otherwise, SKIP to question 18a.

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer Options</th>
</tr>
</thead>
<tbody>
<tr>
<td>17</td>
<td>Yes/No</td>
</tr>
</tbody>
</table>

#### 18a. Has this person given birth to any children in the past 12 months?  
- Yes
- No

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer Options</th>
</tr>
</thead>
<tbody>
<tr>
<td>18a</td>
<td>Yes/No</td>
</tr>
</tbody>
</table>

#### 18b. Does this person have any of his/her own grandchildren under the age of 18 living in this house or apartment?  
- Yes
- No

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer Options</th>
</tr>
</thead>
<tbody>
<tr>
<td>18b</td>
<td>Yes/No</td>
</tr>
</tbody>
</table>

#### 18c. Is the grandparent currently responsible for most of the basic needs of any grandchildren under the age of 18 who live(s) in this house or apartment?  
- Yes
- No

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer Options</th>
</tr>
</thead>
<tbody>
<tr>
<td>18c</td>
<td>Yes/No</td>
</tr>
</tbody>
</table>

#### 19. Has this person ever served on active duty in the U.S. Armed Forces, military Reserves, or National Guard? Active duty does not include training for the Reserves or National Guard, but DOES include activation, for example, for the Persian Gulf War.  
- Yes, now on active duty  
- No, now on active duty but not now  
- No, training for Reserves or National Guard only  
- No, never served in the military

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer Options</th>
</tr>
</thead>
<tbody>
<tr>
<td>19</td>
<td>Yes/No</td>
</tr>
</tbody>
</table>

#### 20. When did this person serve on active duty in the U.S. Armed Forces? Mark (X) the box for EACH period in which this person served.  
- April 1992 or later  
- August 1990 to March 1995 (including Persian Gulf War)  
- September 1980 to July 1990  
- May 1975 to August 1990  
- Vietnam era (August 1964 to April 1975)  
- February 1955 to July 1964  
- Korean War (June 1950 to January 1955)  
- World War II (September 1940 to July 1947)  
- Some other time

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer Options</th>
</tr>
</thead>
<tbody>
<tr>
<td>20</td>
<td>Yes/No</td>
</tr>
</tbody>
</table>

#### 21. In total, how many years of active-duty military service has this person had?  
- Less than 2 years  
- 2 years or more

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer Options</th>
</tr>
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<tbody>
<tr>
<td>21</td>
<td>Yes/No</td>
</tr>
</tbody>
</table>

#### 22. Last week, did this person do ANY work for either pay or profit? Mark (X) the *Yes* box even if the person worked only 1 hour, or helped without pay in a family business or farm for 15 hours or more, or was on active duty in the Armed Forces.  
- Yes
- No

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer Options</th>
</tr>
</thead>
<tbody>
<tr>
<td>22</td>
<td>Yes/No</td>
</tr>
</tbody>
</table>

#### 23. At what location did this person work LAST WEEK? If this person worked at more than one location, print where he or she worked most last week.  
- Address (Number and street name)  
- Name of city, town, or post office

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer Options</th>
</tr>
</thead>
<tbody>
<tr>
<td>23b</td>
<td>Yes/No</td>
</tr>
</tbody>
</table>

#### 24. How did this person usually get to work LAST WEEK? If this person usually used more than one method of transportation during the trip, mark (X) the box of the one used for most of the distance.  
- Car, truck, or van  
- Bus or trolley bus  
- Streetcar or trolley car  
- Subway or elevated  
- Railroad  
- Ferryboat  
- Motorcycle  
- Bicycle  
- Walked  
- Worked at home  
- Skipped to question 25  
- Other method

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer Options</th>
</tr>
</thead>
<tbody>
<tr>
<td>24</td>
<td>Yes/No</td>
</tr>
</tbody>
</table>

#### 25. How many people, including this person, usually rode to work in the car, truck, or van LAST WEEK?  
- Person(s)

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer Options</th>
</tr>
</thead>
<tbody>
<tr>
<td>25</td>
<td>Yes/No</td>
</tr>
</tbody>
</table>

#### 26. What time did this person usually leave home to go to work LAST WEEK?  
- Hour
- Minute
- a.m./p.m.

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer Options</th>
</tr>
</thead>
<tbody>
<tr>
<td>26</td>
<td>Yes/No</td>
</tr>
</tbody>
</table>

#### 27. How many minutes did this person usually take to get from home to work LAST WEEK?  
- Minutes

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer Options</th>
</tr>
</thead>
<tbody>
<tr>
<td>27</td>
<td>Yes/No</td>
</tr>
</tbody>
</table>

#### 28. Last week, was this person on layoff from a job?  
- Yes  
- No

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer Options</th>
</tr>
</thead>
<tbody>
<tr>
<td>28c</td>
<td>Yes/No</td>
</tr>
</tbody>
</table>

#### 29. Last week, was this person TEMPORARILY absent from a job or business?  
- Yes, on vacation, temporary illness, labor dispute, etc.  
- No

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer Options</th>
</tr>
</thead>
<tbody>
<tr>
<td>29</td>
<td>Yes/No</td>
</tr>
</tbody>
</table>

#### 30. Has this person been informed that he or she will be recalled to work within the next 6 months OR been given a date to return to work?  
- Yes  
- No

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer Options</th>
</tr>
</thead>
<tbody>
<tr>
<td>30</td>
<td>Yes/No</td>
</tr>
</tbody>
</table>
Person 5

Please copy the name of Person 5 from the List of Residents on page 2, then continue answering questions below.

Last Name

First Name

MI

Where was this person born?

☐ in the United States - Print name of state

☐ Outside the United States - Print name of foreign country, or Puerto Rico, Guam, etc.

Is this person a CITIZEN of the United States?

☐ Yes, born in the United States - Skip to 10a

☐ Yes, born in Puerto Rico, Guam, the U.S. Virgin Islands, or Northern Marianas

☐ Yes, born abroad of American parent or parents

☐ Yes, U.S. citizen by naturalization

☐ No, not a citizen of the United States

When did this person come to live in the United States? Print numbers in boxes. Year

a. At any time in the last 3 months, has this person attended regular school or college? Include only nursery or preschool, kindergarten, elementary school, and schooling which leads to a high school diploma or a college degree.

☐ No, has not attended in the last 3 months - SKIP to question 11

☐ Yes, public school, public college

☐ Yes, private school, private college

What grade or level was this person attending? Mark (X) ONE box.

☐ Nursery school, preschool

☐ Kindergarten

☐ Grade 1 to grade 4

☐ Grade 5 to grade 8

☐ Grade 9 to grade 12

☐ College undergraduate year (freshman to senior)

☐ Graduate or professional school (for example: medical, dental, or law school)

What is the highest degree or level of school this person has COMPLETED? Mark (X) ONE box.

☐ No schooling completed

☐ Nursery school to 4th grade

☐ 5th grade or 6th grade

☐ 7th grade or 8th grade

☐ 9th grade

☐ 10th grade

☐ 11th grade

☐ 12th grade - NO DIPLOMA

☐ High School Graduate - high school DIPLOMA or the equivalent (for example: GED)

☐ Some college credit, but less than 1 year

☐ 1 or more years of college, no degree

☐ Associate degree (for example: AA, AS)

☐ Bachelor's degree (for example: BA, AB, BS)

☐ Master's degree (for example: MA, MS, MEng, MED, MSW, MBA)

☐ Professional degree (for example: MD, DDS, DVM, LLB, JD)

☐ Doctorate degree (for example: PhD, EdD)

What is this person's ancestry or ethnic origin?

For example: Italian, Jamaican, African Am., Cambodian, Cape Verdean, Norwegian, Dominican, French Canadian, Hallian, Korean, Lebanese, Polish, Nigerian, Mexican, Taiwanese, Ukrainian, and so on.

(For example: Italian, Jamaican, African Am., Cambodian, Cape Verdean, Norwegian, Dominican, French Canadian, Hallian, Korean, Lebanese, Polish, Nigerian, Mexican, Taiwanese, Ukrainian, and so on.)

Did this person live in this house or apartment 1 year ago?

☐ Person is under 1 year old - SKIP to the mailing instructions on page 24.

☐ Yes, this house - SKIP to 12 in the next column

☐ No, outside the United States - Print name of foreign country, or Puerto Rico, Guam, etc., below, then SKIP to 12 in next column.

☐ No, different house in the United States

b. Where did this person live 1 year ago?

Name of city, town, or post office

Did this person live inside the limits of the city or town?

☐ Yes

☐ No, outside the city limits

Name of county

Name of state ZIP Code

If this person is UNDER 5 years of age, SKIP to the mailing instructions on page 24.

Does this person speak a language other than English at home?

☐ Yes

☐ No - SKIP to question 15

What is this language?

For example: Korean, Italian, Spanish, Vietnamese

How well does this person speak English?

☐ Very well

☐ Not well

☐ Wait

☐ Not at all

Does this person have any of the following long-lasting conditions:

☐ Blindness, deafness, or a severe vision or hearing impairment?

☐ Yes

☐ No

a. A condition that substantially limits one or more basic physical activities such as walking, climbing stairs, reaching, lifting, or carrying?

☐ Yes

☐ No

Because of a physical, mental, or emotional condition lasting 6 months or more, does this person have any difficulty in doing any of the following activities:

☐ Yes

☐ No

a. Learning, remembering, or concentrating?

☐ Yes

☐ No

b. Dressing, bathing, or getting around inside the home?

☐ Yes

☐ No

c. Answer if this person is 16 YEARS OLD OR OVER: Going outside the home alone to shop or visit a doctor's office?

☐ Yes

☐ No

d. Answer if this person is 16 YEARS OLD OR OVER: Working at a job or business?

☐ Yes

☐ No
Person 5 (continued)

G If this person is UNDER 15 years of age, SKIP to the mailing instructions on page 24. Otherwise, continue with H.

H Answer question 17 ONLY IF this person is female and 15–50 years old. Otherwise, SKIP to question 18.

17 Has this person given birth to any children in the past 12 months?
- Yes
- No

18 a. Does this person have any of his/her own grandchildren under the age of 18 living in this house or apartment?
- Yes
- No → SKIP to 19

b. Is this grandparent currently responsible for most of the basic needs of any grandchild(ren) under the age of 18 who live(s) in this house or apartment?
- Yes
- No → SKIP to 19

c. How long has this grandparent been responsible for these children?
- Less than 6 months
- 6 to 11 months
- 1 or 2 years
- 3 or 4 years
- 5 or more years

19 Has this person ever served on active duty in the U.S. Armed Forces, military reserve, or National Guard? Active duty does not include training for the reserves or National Guard, but does include activation, for example, for the Persian Gulf War.
- Yes, now on active duty
- Yes, on active duty in past, but not now
- No, training for reserves or National Guard only → SKIP to question 22
- No, never served in the military → SKIP to question 22

20 When did this person serve on active-duty in the U.S. Armed Forces? Mark (☑) a box for EACH period in which this person served.
- April 1995 or later
- August 1990 to March 1995 (including Persian Gulf War)
- September 1980 to July 1990
- May 1975 to August 1980
- Vietnam era (August 1964 to April 1975)
- February 1955 to July 1964
- Korean War (June 1950 to January 1955)
- World War II (September 1940 to July 1947)
- Some other time

21 In total, how many years of active-duty military service has this person had?
- Less than 2 years
- 2 years or more

22 LAST WEEK, did this person do ANY work for either pay or profit? Mark (☑) the "Yes" box even if the person worked only 1 hour, or helped without pay in a family business or farm for 15 hours or more, or was on active duty in the Armed Forces.
- Yes
- No → SKIP to question 28

23 At what location did this person work LAST WEEK? If this person worked at more than one location, print the one worked most last week.
   a. Address (Number and street name)
      If the exact address is not known, give a description of the location such as the building name or the nearest street or intersection.
   b. Name of city, town, or post office
   c. Is the work location inside the limits of that city or town?
      - Yes
      - No, outside the citytown limits
   d. Name of county
   e. Name of U.S. state or foreign country
   f. ZIP Code

24 How did this person usually get to work LAST WEEK? If this person usually used more than one method of transportation during the trip, mark (☑) the box of the one used for most of the distance.
- Car, truck, or van
- Bus or trolley bus
- Streetcar or trolley car
- Subway or railroad
- Railroad
- Ferryboat
- Taxicab
- Motorcycle
- Bicycle
- Walked
- Worked at home → SKIP to question 32
- Other method

Answer question 25 ONLY IF you marked "Car, truck, or van" in question 24. Otherwise, SKIP to question 26.

25 How many people, including this person, usually rode to work in the car, truck, or van LAST WEEK?

26 What time did this person usually leave home to go to work LAST WEEK?
   Hour: Minute: a.m. or p.m.

27 How many minutes did it usually take this person to get from home to work LAST WEEK?

Answer questions 28–31 ONLY IF this person did NOT work last week. Otherwise, SKIP to question 32.

28 a. LAST WEEK, was this person on layoff from a job?
   - Yes → SKIP to question 28c
   - No
   - No → SKIP to question 29

b. LAST WEEK, was this person TEMPORARILY absent from a job or business?
   - Yes, on vacation, temporary illness, labor dispute, etc. → SKIP to question 31
   - No → SKIP to question 32

29 Has this person been informed that he or she will be recalled to work within the next 6 months OR been given a date to return to work?
- Yes → SKIP to 30
- No

20
### Person 5 (continued)

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>29. Has this person been looking for work during the last 4 weeks?</td>
<td>-</td>
</tr>
<tr>
<td>30. LAST WEEK, could this person have started a job if offered one, or returned to work if recalled?</td>
<td>-</td>
</tr>
<tr>
<td>31. When did this person last work, even for a few days?</td>
<td>-</td>
</tr>
<tr>
<td>32. During the PAST 12 MONTHS, how many WEEKS did this person work? Count paid vacation, paid sick leave, and military service.</td>
<td>-</td>
</tr>
<tr>
<td>33. During the PAST 12 MONTHS, in the WEEKS WORKED, how many hours did this person usually work each WEEK?</td>
<td>-</td>
</tr>
<tr>
<td>34. What kind of work was this person doing? (For example: registered nurse, personnel manager, supervisor of order department, secretary, accountant)</td>
<td>-</td>
</tr>
<tr>
<td>35. What was this person’s most important activities or duties? (For example: patient care, directing hiring policies, supervising order clerks, typing and filing, reconciling financial records)</td>
<td>-</td>
</tr>
<tr>
<td><strong>INCOME IN THE PAST 12 MONTHS.</strong></td>
<td>-</td>
</tr>
<tr>
<td>Mark (X) the “Yes” box for each type of income this person received, and give your best estimate of the TOTAL AMOUNT during the PAST 12 MONTHS. (NOTE: The “past 12 months” is the period from today’s date one year ago up through today.) Mark (X) the “No” box to show types of income NOT received.</td>
<td>-</td>
</tr>
<tr>
<td>net income was a loss, mark the “Loss” box to the right of the dollar amount.</td>
<td>-</td>
</tr>
<tr>
<td>For income received jointly, report the appropriate share for each person — or, if that’s not possible, report the whole amount for only one person and mark the “No” box for the other person.</td>
<td>-</td>
</tr>
<tr>
<td>a. Wages, salary, commissions, bonuses, or tips from all jobs. Report amount before deductions for taxes, bond, dues, or other items.</td>
<td>-</td>
</tr>
<tr>
<td>b. Self-employment income from own nonfarm businesses or farm businesses, including proprietorships and partnerships. Report NET income after business expenses.</td>
<td>-</td>
</tr>
<tr>
<td>c. Interest, dividends, net rental income, royalty income, or income from estates and trusts. Report even small amounts credited to an account.</td>
<td>-</td>
</tr>
<tr>
<td>d. Social Security or Railroad Retirement.</td>
<td>-</td>
</tr>
<tr>
<td>e. Supplemental Security Income (SSI).</td>
<td>-</td>
</tr>
<tr>
<td>f. Any public assistance or welfare payments from the state or local welfare office.</td>
<td>-</td>
</tr>
<tr>
<td>g. Retirement, survivor, or disability pensions. Do NOT include Social Security.</td>
<td>-</td>
</tr>
<tr>
<td>h. Any other sources of income received regularly such as Veterans’ (VA) payments, unemployment compensation, child support or alimony. Do NOT include lump sum payments such as money from an inheritance or the sale of a home.</td>
<td>-</td>
</tr>
<tr>
<td><strong>What was this person’s total income during the PAST 12 MONTHS? Add entries in questions 40a to 40h; subtract any losses. If net income was a loss, enter the amount and mark (X) the “Loss” box next to the dollar amount.</strong></td>
<td>-</td>
</tr>
<tr>
<td>Now continue with the mailing instructions on page 24.</td>
<td>-</td>
</tr>
</tbody>
</table>
Pages 22 and 23 are intentionally left blank
Mailing Instructions

Please make sure you have:

- put all names on the List of Residents and answered the questions across the top of the page
- answered all Housing questions
- answered all Person questions for each person on the List of Residents.

Then...

- put the completed questionnaire into the postage-paid return envelope. (It is addressed to the Bureau of the Census Processing Center in Jeffersonville, Indiana)
- make sure the barcode above your address shows in the window of the return envelope.

Thank you for participating in the American Community Survey.

For Census Bureau Use

The Census Bureau estimates that, for the average household, this form will take 18 minutes to complete, including the time for reviewing the instructions and answers. Comments about the questionnaire should be directed to the Associate Director for Administration, U.S. Census Bureau, Room 3104, FB 3, Washington, DC 20233, Attn: 0607-0010. Please DO NOT RETURN your questionnaire to this address. Use the enclosed preaddressed envelope to return your completed questionnaire.

Respondents are not required to respond to any information collection unless it displays a valid approval number from the Office of Management and Budget. This 8-digit number appears in the bottom left on the front cover of this form.

Form ACS-120003 (9-1-2000)
THE American Community Survey

This booklet shows the content of the American Community Survey questionnaire.

Please complete this form and return it as soon as possible after receiving it in the mail.

This form asks for information about the people who are living or staying at the address on the mailing label and about the house, apartment, or mobile home located at the address on the mailing label.

If you need help or have questions about completing this form, please call 1-800-354-7271. The telephone call is free.

Telephone Device for the Deaf (TDD): Call 1-800-656-6266. The telephone call is free.

¿NECESITA AYUDA? Si usted habla español y necesita ayuda para completar su cuestionario, llame sin cargo al 1-877-833-9626. Usted también puede pedir un cuestionario en español o completar su entrevista por teléfono con un entrevistador que habla español.

For more information about the American Community Survey, visit our web site at: http://www.census.gov/acs/www/

US CENSUS BUREAU
### Person 1

(Person 1 is the person living or staying here in whose name this house or apartment is owned, being bought, or rented. If there is no such person, start with the name of any adult living or staying here.)

**What is Person 1’s name?**
- Last Name (Please print): 
- First Name: 
- M: 

**How is this person related to Person 1?**
- ☐ Person 1

**What is Person 1’s sex?** Mark (X) ONE box.
- ☐ Male
- ☐ Female

**What is Person 1’s age and what is Person 1’s date of birth?**
- Age (in years): 
- Month: 
- Day: 
- Year of birth: 

→ NOTE: Please answer BOTH Question 5 about Hispanic origin and Question 6 about race. For this survey, Hispanic origins are not races.

**Is Person 1 of Hispanic, Latino, or Spanish origin?**
- ☐ No, not of Hispanic, Latino, or Spanish origin
- ☐ Yes, Mexican, Mexican Am., Chicano
- ☐ Yes, Puerto Rican
- ☐ Yes, Cuban
- ☐ Yes, another Hispanic, Latino, or Spanish origin — Print origin, for example, Argentinean, Colombian, Dominican, Nicaraguan, Salvadorian, Spanish, and so on.

**What is Person 1’s race?** Mark (X) one or more boxes.
- ☐ White
- ☐ Black, African Am., or Negro
- ☐ American Indian or Alaska Native — Print name of enrolled or principal tribe
- ☐ Asian Indian
- ☐ Chinese
- ☐ Filipino
- ☐ Japanese
- ☐ Korean
- ☐ Native Hawaiian
- ☐ Guamanian or Chamorro
- ☐ Samoan
- ☐ Other Asian — Print race, for example, Hawaiian, Lebanese, Thai, Pakistani, Cambodian, and so on.
- ☐ Other Pacific Islander — Print race, for example, Fijian, Tongan, and so on.
- ☐ Some other race — Print race.

### Person 2

**What is Person 2’s name?**
- Last Name (Please print): 
- First Name: 
- M: 

**How is this person related to Person 1?** Mark (X) ONE box.
- ☐ Husband or wife
- ☐ Biological son or daughter
- ☐ Adopted son or daughter
- ☐ Stepson or stepdaughter
- ☐ Brother or sister
- ☐ Father or mother
- ☐ Grandchild
- ☐ Parent-in-law
- ☐ Son-in-law or daughter-in-law
- ☐ Other relative
- ☐ Roomer or boarder
- ☐ Housemate or roommate
- ☐ Unmarried partner
- ☐ Foster child
- ☐ Other nonrelative

**What is Person 2’s sex?** Mark (X) ONE box.
- ☐ Male
- ☐ Female

**What is Person 2’s age and what is Person 2’s date of birth?**
- Age (in years): 
- Month: 
- Day: 
- Year of birth: 

→ NOTE: Please answer BOTH Question 5 about Hispanic origin and Question 6 about race. For this survey, Hispanic origins are not races.

**Is Person 2 of Hispanic, Latino, or Spanish origin?**
- ☐ No, not of Hispanic, Latino, or Spanish origin
- ☐ Yes, Mexican, Mexican Am., Chicano
- ☐ Yes, Puerto Rican
- ☐ Yes, Cuban
- ☐ Yes, another Hispanic, Latino, or Spanish origin — Print origin, for example, Argentinean, Colombian, Dominican, Nicaraguan, Salvadorian, Spanish, and so on.

**What is Person 2’s race?** Mark (X) one or more boxes.
- ☐ White
- ☐ Black, African Am., Negro
- ☐ American Indian or Alaska Native — Print name of enrolled or principal tribe
- ☐ Asian Indian
- ☐ Chinese
- ☐ Filipino
- ☐ Japanese
- ☐ Korean
- ☐ Native Hawaiian
- ☐ Guamanian or Chamorro
- ☐ Samoan
- ☐ Other Asian — Print race, for example, Hawaiian, Lebanese, Thai, Pakistani, Cambodian, and so on.
- ☐ Other Pacific Islander — Print race, for example, Fijian, Tongan, and so on.
- ☐ Some other race — Print race.
### Person 3

<table>
<thead>
<tr>
<th>Question</th>
<th>Options</th>
</tr>
</thead>
<tbody>
<tr>
<td>What is Person 3's name?</td>
<td>Last Name (Please print) First Name MI</td>
</tr>
<tr>
<td>How is this person related to Person 1? Mark (X) one box.</td>
<td>Husband or wife</td>
</tr>
<tr>
<td></td>
<td>Biological son or daughter</td>
</tr>
<tr>
<td></td>
<td>Adopted son or daughter</td>
</tr>
<tr>
<td></td>
<td>Stepson or stepdaughter</td>
</tr>
<tr>
<td></td>
<td>Brother or sister</td>
</tr>
<tr>
<td></td>
<td>Father or mother</td>
</tr>
<tr>
<td></td>
<td>Grandchild</td>
</tr>
<tr>
<td></td>
<td>Parent-in-law</td>
</tr>
<tr>
<td>What is Person 3's sex? Mark (X) one box.</td>
<td>Male</td>
</tr>
<tr>
<td></td>
<td>Female</td>
</tr>
<tr>
<td>What is Person 3's age and what is Person 3's date of birth?</td>
<td>Please report babies as age 0 when the child is less than 1 year old. Print numbers in boxes.</td>
</tr>
<tr>
<td></td>
<td>Age (in years) Month Day Year of birth</td>
</tr>
<tr>
<td>Is Person 3 of Hispanic, Latino, or Spanish origin?</td>
<td>No, not of Hispanic, Latino, or Spanish origin</td>
</tr>
<tr>
<td></td>
<td>Yes, Mexican, Mexican American, Chicano</td>
</tr>
<tr>
<td></td>
<td>Yes, Puerto Rican</td>
</tr>
<tr>
<td></td>
<td>Yes, Cuban</td>
</tr>
<tr>
<td></td>
<td>Yes, another Hispanic, Latino, or Spanish origin — Print origin, for example: Argentinian, Colombiano, Dominican, Nicaraguan, Salvadoran, Spanish, and so on.</td>
</tr>
<tr>
<td>What is Person 3's race? Mark (X) one or more boxes.</td>
<td>White</td>
</tr>
<tr>
<td></td>
<td>Black, African Am., or Negro</td>
</tr>
<tr>
<td></td>
<td>American Indian or Alaska Native — Print name of enrolled or principal tribe</td>
</tr>
<tr>
<td></td>
<td>Asian Indian</td>
</tr>
<tr>
<td></td>
<td>Japanese</td>
</tr>
<tr>
<td></td>
<td>Native Hawaiian</td>
</tr>
<tr>
<td></td>
<td>Chinese</td>
</tr>
<tr>
<td></td>
<td>Korean</td>
</tr>
<tr>
<td></td>
<td>Guamanian or Chamorro</td>
</tr>
<tr>
<td></td>
<td>Samoan</td>
</tr>
<tr>
<td></td>
<td>Other Pacific Islander — Print race, for example: Filipinos, Tongan, and so on.</td>
</tr>
<tr>
<td></td>
<td>Some other race — Print race</td>
</tr>
</tbody>
</table>

### Person 4

<table>
<thead>
<tr>
<th>Question</th>
<th>Options</th>
</tr>
</thead>
<tbody>
<tr>
<td>What is Person 4's name?</td>
<td>Last Name (Please print) First Name MI</td>
</tr>
<tr>
<td>How is this person related to Person 1? Mark (X) one box.</td>
<td>Husband or wife</td>
</tr>
<tr>
<td></td>
<td>Biological son or daughter</td>
</tr>
<tr>
<td></td>
<td>Adopted son or daughter</td>
</tr>
<tr>
<td></td>
<td>Stepson or stepdaughter</td>
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<tr>
<td></td>
<td>Brother or sister</td>
</tr>
<tr>
<td></td>
<td>Father or mother</td>
</tr>
<tr>
<td></td>
<td>Grandchild</td>
</tr>
<tr>
<td></td>
<td>Parent-in-law</td>
</tr>
<tr>
<td>What is Person 4's sex? Mark (X) one box.</td>
<td>Male</td>
</tr>
<tr>
<td></td>
<td>Female</td>
</tr>
<tr>
<td>What is Person 4's age and what is Person 4's date of birth?</td>
<td>Please report babies as age 0 when the child is less than 1 year old. Print numbers in boxes.</td>
</tr>
<tr>
<td></td>
<td>Age (in years) Month Day Year of birth</td>
</tr>
<tr>
<td>Is Person 4 of Hispanic, Latino, or Spanish origin?</td>
<td>No, not of Hispanic, Latino, or Spanish origin</td>
</tr>
<tr>
<td></td>
<td>Yes, Mexican, Mexican American, Chicano</td>
</tr>
<tr>
<td></td>
<td>Yes, Puerto Rican</td>
</tr>
<tr>
<td></td>
<td>Yes, Cuban</td>
</tr>
<tr>
<td></td>
<td>Yes, another Hispanic, Latino, or Spanish origin — Print origin, for example: Argentinian, Colombiano, Dominican, Nicaraguan, Salvadoran, Spanish, and so on.</td>
</tr>
<tr>
<td>What is Person 4's race? Mark (X) one or more boxes.</td>
<td>White</td>
</tr>
<tr>
<td></td>
<td>Black, African Am., or Negro</td>
</tr>
<tr>
<td></td>
<td>American Indian or Alaska Native — Print name of enrolled or principal tribe</td>
</tr>
<tr>
<td></td>
<td>Asian Indian</td>
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<td>Native Hawaiian</td>
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<tr>
<td></td>
<td>Other Pacific Islander — Print race, for example: Filipinos, Tongan, and so on.</td>
</tr>
<tr>
<td></td>
<td>Some other race — Print race</td>
</tr>
</tbody>
</table>
If there are more than five people living or staying here, print their names in the spaces for Person 6 through Person 12. We may call you for more information about them.

<table>
<thead>
<tr>
<th>Person 6</th>
<th>Person 7</th>
<th>Person 8</th>
</tr>
</thead>
<tbody>
<tr>
<td>Last Name (please print)</td>
<td>First Name</td>
<td>M/F</td>
</tr>
<tr>
<td>Sex</td>
<td>Male</td>
<td>Female</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Person 9</th>
<th>Person 10</th>
<th>Person 11</th>
</tr>
</thead>
<tbody>
<tr>
<td>Last Name (please print)</td>
<td>First Name</td>
<td>M/F</td>
</tr>
<tr>
<td>Sex</td>
<td>Male</td>
<td>Female</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Person 12</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Last Name (please print)</td>
<td>First Name</td>
</tr>
<tr>
<td>Sex</td>
<td>Male</td>
</tr>
</tbody>
</table>
Housing (continued)

11. LAST MONTH, what was the cost of electricity for this house, apartment, or mobile home?
   Last month's cost – Dollars
   □ Included in rent or condominium fee
   □ No charge or electricity not used

b. LAST MONTH, what was the cost of gas for this house, apartment, or mobile home?
   Last month's cost – Dollars
   □ Included in rent or condominium fee
   □ No charge or gas not used

c. IN THE PAST 12 MONTHS, what was the cost of water and sewer for this house, apartment, or mobile home? If you have lived here less than 12 months, estimate the cost.
   Past 12 months' cost – Dollars
   □ Included in rent or condominium fee
   □ No charge

d. IN THE PAST 12 MONTHS, what was the cost of oil, coal, kerosene, wood, etc., for this house, apartment, or mobile home? If you have lived here less than 12 months, estimate the cost.
   Past 12 months' cost – Dollars
   □ Included in rent or condominium fee
   □ No charge or these fuels not used

12. IN THE PAST 12 MONTHS, did anyone in this household receive Food Stamps or a Food Stamp benefit card? Include government benefits from the Supplemental Nutrition Assistance Program (SNAP). Do NOT include WIC or the National School Lunch Program.
   □ Yes
   □ No

13. Is this house, apartment, or mobile home part of a condominium?
   □ Yes → What is the monthly condominium fee? For renters, answer only if you pay the condominium fee in addition to your rent; otherwise, mark the "None" box.
   Monthly amount – Dollars
   □ Yes → What is the monthly condominium fee? For renters, answer only if you pay the condominium fee in addition to your rent; otherwise, mark the "None" box.
   Monthly amount – Dollars
   □ No

14. Is this house, apartment, or mobile home – Mark (X) ONE box.
   □ Owned by you or someone in this household with a mortgage or loan, inclusive home equity loans.
   □ Owned by you or someone in this household and clear (without a mortgage or loan).
   □ Rented?
   □ Occupied without payment of rent? → SKIP to C

15. What is the monthly rent for this house, apartment, or mobile home?
   Monthly amount – Dollars
   □ Yes
   □ No

16. About how much do you think this house and lot, apartment, or mobile home (and lot, if owned) would sell for if it were for sale?
   Amount – Dollars

17. What are the annual real estate taxes on THIS property?
   Annual amount – Dollars
   □ None

18. What is the annual payment for fire, hazard, and flood insurance on THIS property?
   Annual amount – Dollars
   □ None

Answer questions 15a and b if this house, apartment, or mobile home is RENTED. Otherwise, SKIP to question 18.
Housing (continued)

19. a. Do you or any member of this household have a mortgage, deed of trust, contract to purchase, or similar debt on THIS property?
   - Yes, mortgage, deed of trust, or similar debt
   - Yes, contract to purchase
   - No □ SKIP to question 20a

b. How much is the regular monthly mortgage payment on THIS property? Include payment only on FIRST mortgage or contract to purchase.
   Monthly amount: Dollars
   □ [ ]

OR
   □ No regular payment required □ SKIP to question 20a

c. Does the regular monthly mortgage payment include payments for real estate taxes on THIS property?
   - Yes, taxes included in mortgage payment
   - No, taxes paid separately or taxes not required

d. Does the regular monthly mortgage payment include payments for fire, hazard, or flood insurance on THIS property?
   - Yes, insurance included in mortgage payment
   - No, insurance paid separately or no insurance

20. a. Do you or any member of this household have a second mortgage or a home equity loan on THIS property?
   - Yes, home equity loan
   - Yes, second mortgage
   - Yes, second mortgage and home equity loan
   - No □ SKIP to D

b. How much is the regular monthly payment on all second or junior mortgages and all home equity loans on THIS property? Monthly amount: Dollars
   □ [ ]

OR
   □ No regular payment required

D. Answer question 21 if this is a MOBILE HOME. Otherwise, SKIP to E.

21. What are the total annual costs for personal property taxes, site rent, registration fees, and license fees on THIS mobile home and its site? Divide real estate taxes.
   Annual costs: Dollars
   □ [ ]

E. Answer questions about PERSON 1 on the next page if you listed at least one person on page 2. Otherwise, SKIP to page 28 for the mailing instructions.
Please copy the name of Person 1 from page 2, then continue answering questions below.

Last Name

First Name

Where was this person born?
- In the United States - Print name of state.
- Outside the United States - Print name of foreign country, or Puerto Rico, Guam, etc.

Is this person a citizen of the United States?
- Yes, born in the United States
- Yes, born in Puerto Rico, Guam, or the U.S. Virgin Islands
- Yes, born abroad of U.S. citizen parent or parents
- Yes, U.S. citizen by naturalization - Print year of naturalization
- No, not a U.S. citizen

When did this person come to live in the United States? Print numbers in boxes.

At any time in the last 3 months, has this person attended school or college? Include only nursery or preschool, kindergarten, elementary school, home school, and schooling which leads to a high school diploma or a college degree.
- No, has not attended in the last 3 months
- Yes, public school, public college
- Yes, private school, private college, home school

What grade or level was this person attending?
- Nursery school, preschool
- Kindergarten
- Grade 1 through 12 - Specify grade 1 - 12
- College undergraduate years (freshman to senior)
- Graduates or professional school beyond a bachelor's degree (for example: MA or PhD program, or medical or law school)

What is the highest degree or level of school this person has completed? Mark (X) one box. If currently enrolled, mark the previous grade or highest degree received.

- No schooling completed
- Nursery school
- Kindergarten
- Grade 1 through 11 - Specify grade 1 - 11
- 12th grade - NO DIPLOMA

High school graduate
- Regular high school diploma
- GED or alternative credential

College or some college
- Some college credit, but less than 1 year of college credit
- 1 or more years of college credit, no degree
- Associate's degree (for example: AA, AS)
- Bachelor's degree (for example: BA, BS)

After Bachelor's Degree
- Master's degree (for example: MA, MS, MEng, Med, MSW, MBA)
- Professional degree without a bachelor's degree (for example: MD, DDS, DVM, LLB, JD)
- Doctorate degree (for example: PhD, EdD)

Answer question 12 if this person has a Bachelor's degree or higher. Otherwise, skip to question 13.

This question focuses on this person's Bachelor's degree. Please print below the specific major(s) of any Bachelor's degrees this person has received. (For example: chemical engineering, elementary teacher education, organizational psychology)

What is this person's ancestry or ethnic origin?

(For example: Italian, Jamaican, African Am., Cemboodian, Chinese, Danish, Norwegian, Dominican, French Canadian, Haitian, Korean, Lebanese, Polish, Nigerian, Mexican, Taiwanese, Ukrainian, and so on.)

Does this person speak a language other than English at home?
- Yes
- No → Skip to question 15a

What is this language?

For example: Korean, Italian, Spanish, Vietnamese

How well does this person speak English?
- Very well
- Well
- Not well
- Not at all

Did this person live in this house or apartment 1 year ago?
- Yes
- No → Skip to question 16

Where did this person live 1 year ago?
- Address (Number and street name)
- Name of city, town, or post office

Name of U.S. county or municipio in Puerto Rico

Name of U.S. state or ZIP Code
### Person 1 (continued)

15. Is this person CURRENTLY covered by any of the following types of health insurance or health coverage plans? Mark "Yes" or "No" for EACH type of coverage in items a - h.

| a. Insurance through a current or former employer or union (for this person or another family member) | Yes | No |
| b. Insurance purchased directly from an insurance company (for this person or another family member) | Yes | No |
| c. Medicare, for people 65 or older, or people with certain disabilities | Yes | No |
| d. Medicaid, Medical Assistance, or any kind of government-assistance plan for those with low incomes or a disability | Yes | No |
| e. TRICARE or other military health care | Yes | No |
| f. VA (including those who have ever used or enrolled for VA health care) | Yes | No |
| g. Indian Health Services | Yes | No |
| h. Any other type of health insurance or health coverage plan – Specify |  |

16. Answer question 19 if this person is 16 years old or over. Otherwise, SKIP to the questions for Person 2 on page 12.

17. Because of a physical, mental, or emotional condition, does this person have difficulty doing errands alone such as visiting a doctor’s office or shopping?

- Yes
- No

18. What is this person’s marital status?

- Married
- Widowed
- Divorced
- Separated
- Never married (SKIP to 19)

19. In the PAST 12 MONTHS did this person get...

- Yes
- No

20. How many times has this person been married?

- Once
- Two times
- Three or more times

21. In what year did this person last get married?

- Year

22. Answer question 24 if this person is female and 15 - 50 years old, Otherwise, SKIP to question 25a.

23. Has this person given birth to any children in the past 12 months?

- Yes
- No

24. a. Does this person have any of his/her own grandchildren under the age of 18 living in this house or apartment?

- Yes
- No

b. Is this grandparent currently responsible for most of the basic needs of any grandchildren under the age of 18 who live(s) in this house or apartment?

- Yes
- No (SKIP to question 26)

25. a. How long has this grandparent been responsible for these grandchildren?

- Less than 6 months
- 6 to 11 months
- 1 or 2 years
- 3 or 4 years
- 5 or more years

b. Has this person ever served on active duty in the U.S. Armed Forces, military Reserve, or National Guard? Active duty does not include training for the Reserves or National Guard, but DOES include activations, for example, for the Persian Gulf War.

- Yes, now on active duty
- Yes, on active duty during the last 12 months, but not now
- Yes, on active duty in the past, but not during the last 12 months
- No, training for Reserves or National Guard only (SKIP to question 25a)
- No, never served in the military (SKIP to question 25a)

26. When did this person serve on active duty in the U.S. Armed Forces? Mark the box for EACH period in which this person served, even if just for part of the period.

- September 2001 or later
- August 1990 to August 2001 (including Persian Gulf War)
- September 1980 to July 1990
- May 1975 to August 1980
- Vietnam era (August 1964 to April 1975)
- March 1961 to July 1964
- February 1955 to February 1961
- Korean War (July 1950 to January 1955)
- January 1947 to June 1950
- World War II (December 1941 to December 1945)
- November 1941 or earlier

27. a. Does this person have a VA service-connected disability rating?

- Yes (such as 0%, 10%, 20%, ... 100%)
- No (SKIP to question 28a)

b. What is this person’s service-connected disability rating?

- 0 percent
- 10 or 20 percent
- 30 or 40 percent
- 50 or 60 percent
- 70 percent or higher

---

000517
Person 1 (continued)

25. LAST WEEK, did this person work for pay at a job (or business)?
   □ Yes → SKIP to question 30
   □ No → Did not work (or retired)

26. LAST WEEK, did this person do ANY work for pay, even for as little as one hour?
   □ Yes
   □ No → SKIP to question 35

27. At what location did this person work LAST WEEK? If this person worked at more than one location, print where he or she worked most last week.
   a. Address (Number and street name)

28. If the exact address is not known, give a description of the location such as the building name or the nearest street or intersection.

29. Name of city, town, or post office

30. Is the work location inside the limits of that city or town?
   □ Yes
   □ No, outside the city/town limits

31. Name of county

32. Name of U.S. state or foreign country

33. ZIP Code

34. How did this person usually get to work LAST WEEK? If this person usually used more than one method of transportation during the trip, mark (X) the box of the one used for most of the distance.
   □ Car, truck, or van
   □ Bus or trolley bus
   □ Streetcar or trolley car
   □ Subway or elevated
   □ Railroad
   □ Ferryboat
   □ Taxi cab
   □ Motorcycle
   □ Bicycle
   □ Walked
   □ Worked at home → SKIP to question 35a
   □ Other method

35. a. LAST WEEK, was this person on layoff from a job?
    □ Yes → SKIP to question 35c
    □ No

36. b. LAST WEEK, was this person TEMPORARILY absent from a job or business?
    □ Yes, on vacation, temporary illness, maternity leave, other family/personal reasons, bad weather, etc. → SKIP to question 38
    □ No → SKIP to question 36

37. c. Has this person been informed that he or she will be recalled to work within the next 6 months OR been given a date to return to work?
    □ Yes → SKIP to question 37
    □ No

38. During the LAST 4 WEEKS, has this person been ACTIVELY looking for work?
   □ Yes
   □ No → SKIP to question 38

39. LAST WEEK, could this person have started a job if offered one, or returned to work if recalled?
   □ Yes, could have gone to work
   □ No, because of own temporary illness
   □ No, because of all other reasons (in school, etc.)

40. When did this person last work, even for a few days?
    □ Within the past 12 months
    □ 1 to 5 years ago → SKIP to L
    □ Over 5 years ago or never worked → SKIP to question 42

41. During the PAST 12 MONTHS (52 weeks), did this person work 50 or more weeks? Count paid time off as work.
    □ Yes → SKIP to question 40
    □ No

42. a. How many weeks DID this person work, even for a few hours, including paid vacation, paid sick leave, and military service?
    □ 50 to 52 weeks
    □ 48 to 49 weeks
    □ 40 to 47 weeks
    □ 27 to 39 weeks
    □ 14 to 26 weeks
    □ 13 weeks or less

43. b. During the PAST 12 MONTHS, in the WEEKS WORKED, how many hours did this person usually work each WEEK?
Usual hours worked each WEEK

00518
### Person 1 (continued)

1. **Answer questions 41 – 46 if this person worked in the past 5 years. Otherwise, SKIP to question 47.**

2. **41 – 46 CURRENT OR MOST RECENT JOB ACTIVITY.** Describe clearly this person's chief job activity or business last week. If this person had more than one job, describe the one at which this person worked the most hours. If this person had no job or business last week, give information for his/her last job or business.

3. **Was this person—**
   - Mark (X) ONE box.
   - an employee of a PRIVATE FOR-PROFIT company or business, or of an individual, for wages, salary, or commissions?
   - an employee of a PRIVATE NOT-FOR-PROFIT, tax-exempt, or charitable organization?
   - a local GOVERNMENT employee (city, county, etc.)?
   - a state GOVERNMENT employee?
   - a Federal GOVERNMENT employee?
   - SELF-EMPLOYED in own NOT INCORPORATED business, professional practice, or farm?
   - SELF-EMPLOYED in own INCORPORATED business, professional practice, or farm? (For whom did this person work?)
   - working WITHOUT PAY in family business or farm?

4. **For whom did this person work?**
   - If now on active duty in the Armed Forces, mark (X) this box. Do not print the branch of the Armed Forces.
   - Name of company, business, or other employer.

5. **What kind of business or industry was this?**
   - Mark (X) ONE box.
   - manufacturing?
   - wholesale trade?
   - retail trade?
   - other (agriculture, construction, service, government, etc.)?

6. **What kind of work was this person doing?**
   - (For example, registered nurse, personnel manager, supervisor of order department, secretary, accountant)

7. **What were this person's most important activities or duties?**
   - (For example, patient care, directing hiring policies, supervising order clerk, typing and filing, reconciling financial records)

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<th>d. Social Security or Railroad Retirement.</th>
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<th>e. Supplemental Security Income (SSI).</th>
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<th>f. Any public assistance or welfare payments from the state or local welfare office.</th>
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<td>□ No TOTAL AMOUNT for past 12 months</td>
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<th>g. Retirement, survivor, or disability pensions. Do NOT include Social Security.</th>
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<td>□ No TOTAL AMOUNT for past 12 months</td>
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<th>h. Any other sources of income received regularly such as Veterans' (VA) payments, unemployment compensation, child support or alimony. Do NOT include lump sum payments such as money from an inheritance or the sale of a home.</th>
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<tr>
<td>□ Yes → $__________________________ 00</td>
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<tr>
<td>□ No TOTAL AMOUNT for past 12 months</td>
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| i. What was this person's total income during the PAST 12 MONTHS? Add entries in questions 47a to 47h; subtract any losses. If net income was a loss, enter the amount and mark 50 the "Loss" box next to the dollar amount. |
|----------------------------------------------------------------------------------------------------------------
| □ None OR $__________________________ 00 |
| □ Loss TOTAL AMOUNT for past 12 months                                                                      |

8. **Continue with the questions for Person 2 on the next page. If only 1 person is listed on page 2, SKIP to page 25 for mailing instructions.**
The balance of the questionnaire has questions for Person 2, Person 3, Person 4, and Person 5. The questions are the same as the questions for Person 1.
Mailing Instructions

Please make sure you have...
- listed all names and answered the questions on pages 2, 3, and 4
- answered all Housing questions
- answered all Person questions for each person.

Then...
- put the completed questionnaire into the postage-paid return envelope. If the envelope has been misplaced, please mail the questionnaire to:
  U.S. Census Bureau
  P.O. Box 5240
  Jeffersonville, IN 47199-5240

- make sure the barcode above your address shows in the window of the return envelope.

Thank you for participating in the American Community Survey.

For Census Bureau Use

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American Community Survey (ACS)

Why We Ask: Place of Birth, Citizenship and Year of Entry

We ask about place of birth, citizenship, and year of entry to provide statistics about citizens and the foreign-born population. These statistics are essential for agencies and policy makers setting and evaluating immigration policies and laws, understanding how different immigrant groups are assimilated, and monitoring against discrimination.

The questions as they appear on the 2014 ACS paper questionnaire. A question about “foreigners not naturalized” was first included in the Census of 1820, while a question on place of birth originated in 1850, and a year of entry question originated in 1890. These questions were transferred to the ACS when it replaced the Decennial Census long-form in 2005.

Examples of Federal Uses

- Required in the enforcement responsibilities under the Voting Rights Act's bilingual requirements to determine eligible voting populations for analysis and for presentation in federal litigation.
- Required to enforce against discrimination in education, employment, voting, financial assistance, and housing.
- Used in many reporting and research tasks to investigate whether there are differences for citizens and foreign-born individuals in education, employment, home ownership, health, income and many other areas of interest to policymakers.

Examples of Other Uses

State and local agencies use these statistics to understand the needs of all the groups in their communities over time. Some social, economic, or housing trends may have different impacts for different groups; understanding these changes may highlight future social and economic challenges. Advocacy groups use statistics about specific groups to understand current and future challenges and to advocate for policies that benefit their groups.
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Supreme Court of the United States.

Sue EVENWEL, et al., Appellants,

v.

Greg ABBOTT, In His Official Capacity as Governor of the State of Texas, et al., Appellees.

No. 14-940.
September 25, 2015.

On Appeal from the United States District Court for the Western District of Texas

Brief of Former Directors of the U.S. Census Bureau as Amici Curiae in Support of Appellees

J. Gerald Hebert, Trevor Potter, Campaign Legal Center, 1411 K St. NW, Suite 1400, Washington, DC 20005, (202) 736-2200.


Paul M. Smith, Jessica Ring Amunson, Mark P. Gaber, Jenner & Block LLP, 1099 New York Ave. NW, Suite 900, Washington, DC 20001, (202) 639-6000, jamunson@jenner.com, for amici curiae.

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13 U.S.C. § 141(b) .................................................................................. 8
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Amici curiae are former directors of the U.S. Census Bureau. As former directors responsible for administering the U.S. Census, amici have a unique and valuable perspective on the practical implications of the rule proposed by Appellants and the limitations of the data on which such a rule would necessarily rely. In amici’s view, serious practical concerns counsel against adopting Appellants’ proposals to require states to draw districts with equal numbers of either voting age citizens or registered voters.

*1 INTERESTS OF AMICI CURIAE*

**Amicus curiae** Dr. Kenneth Prewitt was the Director of the U.S. Census Bureau from 1998 to 2001. In that capacity, he oversaw the execution of the 2000 decennial Census and development of the American Community Survey. Currently, Dr. Prewitt serves as the Carnegie Professor of Public Affairs and Special Advisor to the President at Columbia University, where he teaches and writes on issues related to the intersection of the Census, politics, and statistics. Prior to serving as Director of the Census, Dr. Prewitt served as Director of the National Opinion Research Center, President of the Social Science Research Council, and Senior Vice President of the Rockefeller Foundation. Dr. Prewitt has
considerable knowledge and experience with the use and limitations of Census data and their effect on the political system.

*2 Amicus curiae Dr. Robert Groves was the Director of the U.S. Census Bureau from 2009 to 2012. During his tenure, he oversaw the 2010 decennial Census and implementation of the American Community Survey. Currently, Dr. Groves is the Executive Vice President and Provost of Georgetown University, where he also serves as a professor in the Math and Statistics Department as well as the Sociology Department. Prior to serving as Director of the Census Bureau, Dr. Groves was a professor at the University of Michigan and Director of its Survey Research Center, and before that a research professor at the University of Maryland's Joint Program in Survey Methodology. Dr. Groves has written extensively on the mode of data collection and its effect on responses, the social and political influences on survey participation, and the effect of privacy concerns on Census data collection. He has significant knowledge and experience related to the use and limitations of Census data and their effect on the political system.

Amicus curiae Dr. Martha Farnsworth Riche was the Director of the U.S. Census Bureau from 1994 to 1998. In that capacity, she oversaw the design of the 2000 decennial Census, as well as the new American Community Survey. Currently, Dr. Riche is affiliated with the Cornell Population Center at Cornell University, and participates in research projects with various Washington-based organizations, most recently on issues of demographic concern to the U.S. military. Prior to serving as Director of the Census Bureau, Dr. Riche directed policy studies for the Population Reference Bureau, and was a founding editor of American Demographics magazine. Dr. Riche has considerable knowledge and experience with the use and limitations of Census data across the public, private, for profit, and not-for-profit sectors.

Amicus curiae Vincent P. Barabba was the Director of the U.S. Census Bureau from 1973 to 1976 and from 1979 to 1980 - the only director to be appointed by presidents of both political parties. After serving as Director of the Census Bureau, Dr. Barabba was appointed by Presidents Reagan and George H.W. Bush to be the U.S. Representative to the Population Commission of the United Nations. He has also served on the board of directors for the Marketing Science Institute, the American Institutes for Research, and the National Opinion Research Center of the University of Chicago. In recognition of his performance in the private and public sectors he has received: An Honorary Doctorate of Laws degree from the Trustees of the California State University, been Inducted into the Market Research Council Hall of Fame, and was awarded The Certificate of Distinguished Service for Contribution to the Federal Statistical System from the Office of Management and Budget. Currently, Dr. Barabba is a member of the California Citizens Redistricting Commission. He has a demonstrated interest in both accurate population statistics and redistricting.

*4 SUMMARY OF ARGUMENT

In order to comply with the equal protection principle of one-person, one-vote, nearly all states and jurisdictions redistrict using total population data based on counts from the most recent decennial U.S. Census. Appellants urge the Court to overthrow this long-settled practice and replace it with one of the two voter-based measures of population they propose - citizen voting age population or registered voters. Beyond the legal and policy flaws with Appellants' argument, serious practical concerns counsel against adopting either of their proposed metrics as a constitutionally mandated means of complying with the one-person, one-vote principle.

As an initial matter, there is no actual count of the number of voting age citizens. In keeping with the manner the Constitution provides for apportioning seats in the U.S. House of Representatives among the states, the Census Bureau counts the number of persons in each state. The Census Bureau does not count the number of citizens. The only voting age citizen data that exists are estimates based on a continual sampling conducted as part of the American Community Survey (“ACS”) by the Census Bureau. But ACS was not designed with redistricting in mind. The timing of ACS estimates does not align with the timing of redistricting and ACS estimates are not reported at the small geographic levels redistricters normally use to build districts. Moreover, the geographic areas at which such estimates are available carry large error
margins because of the small sample sizes. These factors make the ACS an inappropriate *5 source of data to support a constitutional rule requiring states to create districts with equal numbers of voting age citizens.

Nor is it possible to accurately obtain a count of voting age citizens by inquiring about citizenship status as part of the Census count. Recent experience demonstrates lowered participation in the Census and increased suspicion of government collection of information in general. Particular anxiety exists among non-citizens. There would be little incentive for non-citizens to offer to the government their actual status; the result would be a reduced rate of response overall and an increase in inaccurate responses. Both would frustrate the actual express obligation the Constitution imposes on the U.S. Census Bureau to obtain a count of the whole number of persons in order to apportion House of Representatives seats among the states.

Finally, Appellants' suggestion that voter registration data be used to draw districts is even more flawed. Studies show that the country's voter registration data is often inaccurate and outdated. And its inaccuracy aside, voter registration is, as this Court has already recognized, a fluctuating and political measure, making it generally a poor candidate for protecting a right to equal representation guaranteed by the Constitution.

Adequate data to support Appellants' positions simply do not exist. The district court's judgment should be affirmed.

*6 ARGUMENT

A theory of how to determine equal protection for purposes of the one-person, one-vote principle is only as good as the data upon which it is built. Appellants urge the Court to adopt a constitutional rule that would require states to draw districts that have equal numbers of eligible voters rather than equal numbers of people. But the available data to implement such a requirement simply cannot bear the weight the Constitution requires. Indeed, such a requirement would in practice lead to serious equal protection violations because of the inherent uncertainty and fluctuation currently present in the various measures proposed by Appellants to tally eligible voters. 2 Moreover, there is strong reason to doubt sufficiently precise data could be obtained to ensure Appellants' theory of equal protection would ever be equal in practice.

An overview of the history and legal framework regarding population data aids in understanding the practical difficulties posed by Appellants' position.

*7 I. States Redistrict Based Upon Decennial Census Data that Counts the “Whole Number of Persons” in Each State and There Is No Count of “Citizens” by the Decennial Census.

A. Legal Framework and History of the Census.

The Constitution contains only one explicit requirement regarding the enumeration of population: to properly apportion the number of seats in the House of Representatives among the states, “the whole number of persons in each State,” U.S. Const, amend XIV, § 2, must be enumerated “every … ten years, in such Manner as [Congress] shall by Law direct,” id. art. I, § 2. 3

Since the original decennial Census in 1790, Congress has passed a number of laws regarding the Census. 4 The discretion afforded the Census Bureau to determine the content and methodology of the Census has grown over time. Originally, U.S. Marshals conducting the Census took an oath to obtain “a just *8 and perfect enumeration,” see Act of Mar. 1, 1790, § 1, 1 Stat. 101. Congress amended this provision in 1810 to require “an actual inquiry at every dwelling-house.” Act of Mar. 26, 1810, § 1, 2 Stat. 565-66. The current Census Act, enacted in 1954, also required data be collected by personal visit until it was modified first to permit some non-apportionment data to be obtained through statistical sampling, see

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13 U.S.C. § 195, and then to repeal the requirement that Census data be obtained through personal visits, and thus permit the Census Bureau to obtain responses through the mail, see Act of Aug. 31, 1964, Pub. L. No. 88-530, 78 Stat. 737.

Currently, the only statutorily required data point the Census Bureau must obtain is a “tabulation of total population by States,” 13 U.S.C. § 141(b), which is necessary to fulfill the constitutional mandate to apportion based on the “whole numbers of persons,” U.S. Const. amend. XIV, § 2; see Dep’t of Commerce v. U.S. House of Representatives, 525 U.S. 316, 341 (1999) (holding that Census Act requires actual enumeration data, not sample-based counts, to be used for apportionment purposes). Beyond that, the Secretary of Commerce, acting through the Census Bureau and its directors, is granted wide latitude to conduct the Census “in such form and content as he [or she] may determine, including the use of sampling procedures and special surveys. In connection with any such census, the Secretary is authorized to obtain such other census information as necessary.” 13 U.S.C. § 141(a).

Exercising the discretion afforded by Congress (and, in turn, conferred upon Congress by the Constitution), the Census Bureau has, in every Census since 1970, asked only a limited number of questions (known as the “short form”) as part of the actual enumeration of every person. These “short form” questions are generally limited to information such as name, age, sex, and race. From 1970 to 2000, the Census Bureau also sent a “long form” to approximately one in every six households. This “long form” was used to collect answers to a wider array of questions, including demographic, economic, social, and housing questions, as well as inquiring about citizenship status. The data gathered through the “long form” sampling was used by local, state, and federal agencies to administer a wide range of government programs. See Dep't of Commerce, 525 U.S. at 341 (characterizing the Census as the “linchpin of the federal statistical system” (quotation marks omitted)).

Following the 2000 Census, the decennial “long form” was discontinued and was replaced by a continual sampling program called the American Community Survey (“ACS”). ACS collects the same type of information that was included on the long form, but does so on a continuous basis throughout the decade. Each month, about 295,000 addresses are mailed the ACS questionnaire, for a total of 3.5 million households a year, or roughly one in thirty-eight households. The ACS data is then used to generate three sets of estimates, according to the size of the jurisdictions covered: a yearly report for cities and states with over 65,000 people, a three-year report for jurisdictions with over 20,000 people, and a five-year report for all jurisdictions. This practice reflects the small size of the ACS sample compared to the prior decennial long form, and the resultant larger sampling errors. A new version of each report is published every year, with the most recent year's data replacing the oldest year's data in the three- and five-year versions. The smallest geographic unit for which ACS estimates are available is the Census block group level in the five-year report. Unlike short form counts, ACS estimates are never available at the individual Census block level.

### B. States Rely on Census Data to Redistrict.

Understandably, states and municipalities do not generally fulfill their requirement to redistrict congressional, state legislative, and other local districts by conducting their own, separate population counts. Rather, they largely rely on Census data to perform their redistricting obligations. See Bd. of Estimate of City of New York v. Morris, 489 U.S. 688 (1989); Reynolds v. Sims, 377 U.S. 533 (1964); Wesberry v. Sanders, 376 U.S. 1 (1964). Indeed, the constitutions and laws of a number of states expressly require that decennial Census data be used to redistrict. See, e.g., N.J. Const. art. IV, § 2, ¶ 1 (requiring state senate seats to be apportioned “as nearly as may be according to the number of their inhabitants as reported in the last preceding decennial census of the United States” (emphasis added)); Pa. Const. art. 2, § 17(a) (requiring redistricting to occur “each year following the Federal decennial census”); Ga. Const. art. 3, § 2 (same); Ill. Const, art. 4, § 3(b) (same); Fla. Stat. § 11.031(1) (“All acts of the Florida Legislature based upon population and all constitutional apportionments shall be based upon the last federal decennial statewide census”); Ill. Comp. Stat., ch. 55, § 2-3001c (defining “[p]opulation” for county board redistricting as “the number of inhabitants as determined
by the last preceding federal decennial census”); see also Karcher v. Daggett, 462 U.S. 725, 738 (1983) (approving the use of decennial Census counts for congressional redistricting, noting that because “the census count represents the best population data available, it is the only basis for good-faith attempts to achieve population equality” (internal quotation marks and citation omitted)).

States and municipalities do, however, generally use their own geographic units - called voter precincts - for purposes of conducting elections in their respective jurisdictions. Each voter precinct is comprised of a number of Census blocks. Congress has facilitated states' reliance on Census data for redistricting by providing that states may submit to the Census Bureau, three years prior to the decennial Census, the geographic boundaries for which they would like Census data to aid them in making redistricting decisions. See 13 U.S.C. § 141(c). Thus, states generally provide the Census with voter precinct information, and the Census in turn provides the states with data files that are organized by voter precincts.  

*13 II. Serious Practical Concerns Counsel Against Constitutionally Requiring States to Draw Districts with Equal Numbers of Voting Age Citizens.  

A constitutional requirement mandating that states draw legislative districts with equal numbers of voting age citizens would be impossible to accurately implement with currently available data. Moreover, for several reasons, it would be difficult to obtain an accurate actual count, even were one attempted.  

A. ACS Citizenship Estimates Cannot Provide the Basis For a Constitutional Equal Protection Rule. 

The actual number of voting age citizens in each state is unknown. The only information in existence is ACS's statistical sample-based estimates. In some circumstances, statistical sampling can be preferable to an actual count. See Dept of Commerce, 525 U.S. at 322-23 (“Some identifiable groups - including certain minorities, children, and renters - have historically had substantially higher undercount rates than the population as a whole.”); id. at 354 (“[U]nadjusted headcounts are also subject to error or bias - the very fact that creates the need for a statistical supplement”) (Breyer, J., concurring in part, dissenting in part). But the ACS was not designed to provide data to support a constitutional right to districts with equal numbers of voting age citizens.  

1. The ACS Estimates Do Not Align with the Timing of Redistricting.  

As an initial matter, the ACS estimates do not align with the timing of congressional apportionment or traditional legislative apportionment. States traditionally redistrict their state legislative districts at, the same time as their congressional districts, using the same decennial Census count that triggered the congressional reapportionment. States thus use the Census count to create population equality among and within the states measured by a single, consistent snapshot in time that persists for the decade. As this Court explained in Georgia v. Ashcroft, 539 U.S. 461 (2003), superseded by statute on other grounds as stated in Alabama Legislative Black Caucus v. Alabama, 135 S. Ct. 1257 (2015):

When the decennial census numbers are released, States must account for any changes or shifts in population. But before the new census, States operate under the legal fiction that even 10 years later, the plans are constitutionally apportioned. After the new enumeration, no districting plan is likely to be legally enforceable if challenged, given the shifts and changes in a population over 10 years. And if the State has not redistricted in response to the new census figures, a federal court will ensure that the districts comply with the one-person, one-vote mandate before the next election.

Using the ACS voting age citizen estimates would unsettle this system. To begin, only the five-year information could be used because the one- and three-year reports are not statistically reliable at the small geographic units used to draw district boundaries. *See supra* Part I. This poses several problems that seriously undermine the ACS’s utility for redistricting.

First, with respect to the ACS five-year survey, eighty percent of the data is already between two and five years old at the time of redistricting. In contrast, redistricting occurs as soon as the population counts currently used by states is released by the Census Bureau. To illustrate, if ACS estimates were used instead of the total population count, a state redistricting in 2021 would be using aggregated estimates spanning from 2015 to 2020. Because the map drawn in 2021 would govern elections through the decade, by 2030, forty percent of the underlying aggregated estimates will be from questionnaires answered fourteen or fifteen years prior. The ACS estimates are therefore a more stale source of information than the total population count currently relied upon by the states.

Second, because the ACS estimates contain five years of sampling, and the age information is not adjusted each year to reflect the passage of a year, many respondents who were between the ages of thirteen and seventeen when their responses were recorded will continue to be excluded from the voting age citizen count at the time the estimates are used to draw district lines, despite the fact that they are in fact eighteen or older at that time. *See Nathaniel Persily, The Law of the Census: How to Count, What to Count, Whom to Count, and Where to Count Them, 32 Cardozo L. Rev. 755, 777 (2011).* This problem is exacerbated, as discussed above, by the fact that district lines remain in place for a decade, meaning that at the end of the redistricting cycle, a thirty-two-year-old person is not “counted” as a voting age person in their district if she was seventeen when first surveyed.

Third, the share of minorities among people under the age of eighteen greatly exceeds their share of the total population. As a result, areas with larger minority populations will be disproportionately affected by the use of ACS estimates that are not annually updated to reflect the actual age of respondents at the time the report is released, thus undercounting “eligible voters” among minority communities and therefore overpopulating minority legislative districts.

Together, these issues would result in outdated information governing district lines and entrenched undercounting of young voters, disproportionately affecting minority populations. For these reasons, the use of five-year-old ACS estimates cannot support the constitutional one-person, one-vote requirement.

2. ACS Estimates Are Not Available at the Smallest Geographic Levels, and Some Data is Suppressed to Protect Privacy.

An additional problem is that ACS estimates are not available at the smallest geographical level that is actually used for purposes of redistricting - the Census block. The smallest geographic level at which ACS estimates can accurately be utilized is the block group level. *See Persily, 32 Cardozo L. Rev. at 777.* This would pose significant problem for states seeking to evenly populate districts. “In order to achieve the lowest possible levels of deviation within state legislative and congressional plans, state technicians have repeatedly advised the Census Bureau that they need decennial counts by small-area geography such as voting districts and census blocks.” *States need data at granular levels in order to make a good-faith effort to equalize population to the extent possible among districts. See Karcher, 462 U.S. at 730 (requiring that, for congressional redistricting, states “make a good-faith effort to achieve precise mathematical equality” (quotation marks omitted)); Brown v. Thomson, 462 U.S. 835, 842 (1983) (noting that the Court has permitted “minor deviations from mathematical equality among state legislative districts” (quotation marks omitted)). Without the granular Census block data typically used to balance population between and among districts, states relying*
upon ACS voting age citizen estimates likely will be unable to satisfy the standard this Court requires for legislative redistricting.

Moreover, even at the block group level, there are a number of geographical areas where there are too few people to permit the Census Bureau to even release estimates without jeopardizing privacy. Congress has mandated that Census data may only be used for “the statistical purpose for which it is supplied,” 13 U.S.C. § 9(a)(1), and that the Census Bureau may not “make any publication whereby the data furnished by any particular … individual … can be identified,” id. § 9(a)(2). As a result, the Census Bureau suppresses certain estimates that could be linked to identifiable persons in light of the small geographic size of the reporting area. 16

States depend upon population counts being reported at small geographic units to permit districts to be built that meet the constitutional requirement for equal distribution of population. In addition, having decennial Census counts available at small geographic units makes it easier to follow voter precinct lines or other political subdivision lines, such as city boundaries, particularly where those lines have recently changed by annexations or precinct splits. The ACS voting age citizen estimates are not reported - and in some cases 19 are statutorily prohibited from being reported - at the Census block level. The ACS estimates thus cannot meet the needs of states for redistricting purposes.

3. As a Statistical Sample, ACS Estimates Are Subject to Error That Makes their Use for Line-Drawing Difficult.

As with any survey, the ACS estimates are subject to non-sampling errors (e.g., errors in data coding) and sampling errors (e.g., the chosen sample is non-representative of the actual community). 17 The ACS reports margins of error at the ninety percent confidence level. 18 For example, if the ACS estimates reported that a county had 10,000 citizens over the age of eighteen, with a five percent relative error, nine times out of ten (ninety percent of the time) one could be confident that the actual citizen voting age population of the county was between 9,500 and 10,500.

The margin of error grows as the sample size decreases, so the smaller the area, the higher the possibility of error. This could become a significant issue because redistricting decisions are often made on the margins, using very small geographic units to 20 surgically move populations in and out of districts to satisfy the one-person, one-vote requirement. And, as discussed above, the smallest unit - the Census block - is not available with ACS estimates because of sample size limitations.

Take for example Titus County, Texas, where Appellant Sue Evenwel resides. See Br. of Appellants at 10. Titus County has eight Census tracts, each with between two and four Census block groups, for a total of twenty-two block groups - the smallest level of geography reported by the ACS. The relative error for the ACS's estimates of voting age citizens for the Titus County block groups range from a low of 14.1 percent to a high of 36.6 percent. Figure 1 below shows the estimates by block group for Titus County.

<table>
<thead>
<tr>
<th>Block Group</th>
<th>Est. CVAP with Absolute and Relative Error</th>
<th>Block Group</th>
<th>Est. CVAP with Absolute and Relative Error</th>
</tr>
</thead>
<tbody>
<tr>
<td>9501: #1</td>
<td>1,045 ±213 (20.4%)</td>
<td>9505: #1</td>
<td>640 ±153 (23.9%)</td>
</tr>
<tr>
<td>9501: #2</td>
<td>485 ±148 (30.5%)</td>
<td>9505: #2</td>
<td>560 ±149 (26.6%)</td>
</tr>
</tbody>
</table>

Figure 1: Titus County, Texas CVAP Estimates with Absolute and Relative Error by Block Group (2009-2013)
As Figure 1 shows, even if redistricters could conceivably rely upon block groups to move areas among districts to properly draw boundaries, they would contend with relatively large error margins. For example, if an adjoining district needed to be increased by 330 voting age citizens, Block Group 4 of Census Tract 9508 would be considered. But the most that can be said is that nine times out of ten, one could be confident that there were between 219 and 441 voting age citizens in that area - a 33.6 percent relative error.

The error margins are still relatively high at the next largest geographic unit, the Census tract, as illustrated by Figure 2 below.

**Figure 2: Titus County, Texas CVAP Estimates and Error Margins by Census Tract**

<table>
<thead>
<tr>
<th>Census Tract</th>
<th>Est. CVAP</th>
<th>Absolute Error</th>
<th>90% Confidence Range</th>
<th>Relative Error</th>
</tr>
</thead>
<tbody>
<tr>
<td>9501</td>
<td>1,530</td>
<td>±210</td>
<td>1,320 - 1,740</td>
<td>13.7%</td>
</tr>
<tr>
<td>9502</td>
<td>1,570</td>
<td>±180</td>
<td>1,390 - 1,750</td>
<td>11.5%</td>
</tr>
<tr>
<td>9503</td>
<td>4,755</td>
<td>±297</td>
<td>4,458 - 5,052</td>
<td>6.2%</td>
</tr>
<tr>
<td>9504</td>
<td>4,230</td>
<td>±297</td>
<td>3,933 - 4,527</td>
<td>7.0%</td>
</tr>
<tr>
<td>9505</td>
<td>1,200</td>
<td>±182</td>
<td>1,018 - 1,382</td>
<td>15.2%</td>
</tr>
<tr>
<td>9506</td>
<td>2,190</td>
<td>±217</td>
<td>1,973 - 2,407</td>
<td>9.9%</td>
</tr>
</tbody>
</table>
The relative error ranges from 6.2 to 19.4 percent for the Titus County Census tracts. So, if redistricters needed to move 635 people to a neighboring district, tract 9507 would be an obvious candidate, but using ACS estimates, the most they could know is that nine times out of ten, it would contain between 512 and 758 citizens of voting age.

All of these issues together - the timing issues, the unavailability of estimates at the block level typically used by redistricters, the unavailability of certain estimates because of privacy concerns, and the error margins combine to make the ACS voting age citizen estimates an inappropriate source to support the constitutional one-person, one-vote right.

This is not to say the ACS estimates are inappropriate for other uses. Because it is the only citizenship information that exists, where courts require citizenship information to support legal claims, as some have for cases under Section 2 of the Voting Rights Act, see, e.g., Valdespino v. Alamo Heights Independent School District, 168 F.3d 848, 853 (5th Cir., 1999), it is the “best population data available,” Karcher, 462 U.S. at 738 (quotation marks omitted). It is one thing to use less than perfect data when it is the only data available to meet a statutory evidentiary burden; it is quite another to create and impose a new constitutional rule that must necessarily be built upon that data.

*23  B. Asking Citizenship Status of Every Household Would Lead to Reduced Response Rates and Inaccurate Responses, While Multiplying Privacy and Government Intrusion Fears.

Directly inquiring about citizenship status as part of the short form Census is not a solution to the data problem posed by Appellants' legal theory. Doing so would likely exacerbate privacy concerns and lead to inaccurate responses from non-citizens worried about a government record of their immigration status.

During the past two decades, the Census Bureau has had to contend with significantly increased distrust, based on concerns about government intrusion and privacy. When the 2000 Census was taken, controversy erupted over the Census questions, with congressional leaders and others calling on people to disregard questions they found intrusive. In one survey, 71 percent of respondents said that intrusive questions should go unanswered. This problem continued with the 2010 Census - between 2009 and 2010, one survey showed the Census Bureau dropped in its “trust” rating from 75 percent to 39 percent. One Congresswoman publicly proclaimed that her family “will only be indicating the number of people in the household, because ‘the Constitution doesn’t require any information beyond that.’”

A mandatory inquiry into citizenship status is all the more likely to engender privacy concerns, particularly among non-citizens. “The nuanced reasons for the question … will of course be lost to millions upon millions of Americans. The question will be viewed with suspicion.” It is foolish to expect that census-taking is immune from anxieties that surround such issues as undocumented aliens, immigration enforcement, terrorism prevention, national identity cards, total information awareness, and sharp increases in surveillance generally.

In addition to both citizens and non-citizens simply not responding, “[n]on-citizens, mistrustful of the government's promise that their answers to a census question can never be used against them, will misrepresent themselves on the census form.”

*25  The sum effect would be bad Census data. And any effort to correct for the data would be futile.
The Census Bureau cannot become a quasi-investigatory agency and still perform its basic responsibilities as a statistical agency. Responses to a citizenship question cannot be validated on a case-by-case basis. Although the bureau may devise ways to estimate the magnitude of misrepresentation in responses to a citizenship question at the national level, such an estimate would not likely be robust enough to be used in state-level counts - let alone at the smaller levels of geography relevant to congressional districting, state legislatures, and local government. 27

Finally, because a one-by-one citizenship inquiry would invariably lead to a lower response rate to the Census in general, such an inquiry would seriously frustrate the Census Bureau's ability to conduct the only count the Constitution expressly requires: determining the whole number of persons in each state in order to apportion House seats among the states. See U.S. Const, art. II, § 1; id. amend XIV, § 2. 28

Neither existing data estimates nor a potential actual count can reliably permit states to draw districts *26 with equal numbers of voting age citizens. As a result, voting age citizen data cannot plausibly serve as a constitutionally-mandated metric for defining the one-person, one-vote principle.

III. Voter Registration Data Would Be an Inappropriate Measure Upon Which to Require Districts To Be Drawn.

Appellants' alternative measure - voter registration data - is also an inappropriate measure by which to require states to draw districts. The data is often inaccurate and unreliable, it is prone to dramatic changes, and it is generally available only at the voting precinct level, not at the smaller Census block level at which states generally draw districts.

Although this Court has before permitted a state to draw districts based on voter registration data, it did so only for an interim districting plan with assurances that the data in the particular case did not vary from other population measures. In so doing, the Court expressed considerable doubts about the use of this data, stating:

Use of a registered voter or actual voter basis … depends … upon the extent of political activity of those eligible to register and vote. Each is thus susceptible to improper influences by which those in political power might be able to perpetuate underrepresentation of groups constitutionally entitled to participate in the electoral process, or perpetuate a ghost of prior malapportionment. Moreover, fluctuations in the number of registered voters in a given election may be sudden and substantial, caused by such fortuitous factors as a peculiarly *27 controversial election issue, a particularly popular candidate, or even weather conditions.

Burns v. Richardson, 384 U.S. 73, 92-93 (1966) (internal quotation marks omitted) (footnotes omitted). These problems have not changed since 1966 when Burns was decided.

A 2012 study by the Pew Charitable Trust found that approximately 24 million voter registration records in the United States - 1 in 8 - are invalid or inaccurate, including 12 million with incorrect addresses, suggesting voters had moved or the addresses were otherwise incorrect. 29 The study also found 1.8 million deceased still registered, and 2.75 million voters registered in more than one state. 30

Beyond the inaccuracy of voter registration data, state registration data simply is not available at the Census block level. Rather, the smallest geographic unit at which voter registration data is available is the voter precinct level. Thus, redistricters would not be able to move particular Census blocks from district to district and would instead be limited
to moving precincts. These geographic areas are generally too large to accurately draw districts with substantially equal populations.

*28 In light of the serious flaws in voter registration data, it would in most instances be a violation of equal protection for this metric to be used, contrary to Appellants’ argument that the Constitution actually should require it. 31

CONCLUSION

For the foregoing reasons, the Court should affirm the decision of the district court.

Footnotes

1 Pursuant to Rule 37.6, amici affirm that no counsel for a party authored this brief in whole or in part and that no person other than amici and their counsel made a monetary contribution to its preparation or submission. The parties’ letters of consent to the filing of amicus briefs are on file with the Clerk’s office.

2 Indeed, as Appellants’ own brief demonstrates, there is considerable fluctuation and uncertainty even among the multiple measures Appellant proposes as potential constitutional requirements. See Br. of Appellants at 9,11-12.


4 See generally U.S. Census Bureau, Census Instructions, https://www.census.gov/history/www/through_the_decades/census_instructions/ (last visited September 23, 2015) (providing description of congressional authorizations and instructions provided to U.S. Marshals, enumerators, and inhabitants from 1790 to 2010).


6 See, e.g., U.S. Census Bureau, Summary File 3: 2000 Census of Population & Housing - Chapter 8: Accuracy of the Data 8-3 (July 2007), https://www.census.gov/prod/cen2000/doc/sf3.pdf. Although the total sample size was one in six households, it was not evenly distributed: a greater percentage of households in rural areas were sampled to increase the reliability of the data estimates in such areas. Id.


9 Id. at 6, 8.


11 See id. at 13. For example, if one five-year report aggregates information from 2008 to 2013; the next report will cover 2009 to 2014.

12 Id., Appendix 1 at A-2. The Census Bureau has developed different levels of “statistical geography” to report information. The largest is the Census tract; typically each county will contain several tracts, with each tract having an ideal population of 4,000 (ranging from 1,200 to 8,000). See U.S. Census Bureau, 2010 Geographic Terms and Concepts, https://www.census.gov/geo/reference/terms.html (last visited Sept. 23, 2015). Block groups are clusters of blocks within a tract, and contain between 600 and 3,000 people. Id. The lowest level of geography is the individual Census block, which follows physical features (such as the streets bounding a city block) or non-physical features (such as property lines). Id.

13 If the Court holds that the Constitution requires states and local governments to use voting age citizens as the measure for the one-person, one-vote principle, nothing in the Constitution or in the current Census Act would require the Census Bureau to provide this information to states and local governments. Rather, the Court would be requiring states and local governments to obtain this information on their own, in the process abrogating the many state constitutional and statutory provisions linking the state process to the federal Census data.


Kenneth Prewitt, *What if We Give a Census and No One Comes?*, 304 *Sci. Mag.* 1452 (June 4, 2004).

Id.

Id.


Counting the Vote: Should Only U.S. Citizens be Included in Apportioning Our Elected Representatives?: Hearing Before Subcomm. on Federalism and the Census of the H. Comm. on Gov't Reform, 109th Cong. 77 (2005) (Statement of Kenneth Prewitt).

Id. at 78.

Id.

Id.

Appellants offer no explanation for how it could be that the Fourteenth Amendment *forbids* Texas from apportioning seats within the state in the same manner the Fourteenth Amendment *requires* seats to be apportioned among the states.


Id. at 4.

The “Non-Suspense Voter Registration” metric offered by Appellants is equally flawed - it adds additional potential error related to mailing of notices. See Br. of Appellants at 9.
Census 2000
Content Reinterview Survey:
Accuracy of Data for
Selected Population and
Housing Characteristics as
Measured by Reinterview

FINAL REPORT
This evaluation reports the results of research and analysis undertaken by the U.S. Census Bureau. It is part of a broad program, the Census 2000 Testing, Experimentation, and Evaluation (TXE) Program, designed to assess Census 2000 and to inform 2010 Census planning. Findings from the Census 2000 TXE Program reports are integrated into topic reports that provide context and background for broader interpretation of results.

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Methods Division

US CENSUS BUREAU
Helping You Make Informed Decisions
respondents changed answers during the reinterview. It is not surprising that this question displayed high inconsistency. Opinion questions often show high levels of inconsistency because the respondent may change opinions or perceptions between the two interviews. When evaluating such questions, we cannot determine if the results show response error or if they show changes in opinion.

The significant net difference rate suggests that one or both of the model assumptions (independence and replication) have not been met for the “Very well,” “Well,” and “Not at all” categories.

The inconsistency level for the English-speaking ability question was high in both 2000 and 1990, but their indexes were not significantly different (z = -0.3). Table 22 below provides the inconsistency level and aggregate index of inconsistency for this question by decade.

| Table 22. Aggregate response variance measures for English-speaking ability by decade |
|-----------------------------------------------|-------------------|-------------------|-------------------|
| Inconsistency level | 2000 Index of Inconsistency | 1999 Index of Inconsistency |
| High | Estimate 59.5, 90-percent confidence interval 56.8 to 62.5 | High | Estimate 60.3, 90-percent confidence interval 57.4 to 63.4 |

Households with non-Hispanic sample persons showed less inconsistency than households with Hispanic sample persons, although both were high. Households with foreign-born sample persons showed less inconsistency than households with native sample persons, although both were high.

Place of birth (CRS 16, Census 13)

Some changes have been made to this question since 1990. Response check boxes were added to distinguish between born in the United States and born outside the United States. Also, separate write-in lines were provided for state of birth and place of birth outside the United States. In 1990, only one write-in line was provided.

The place of birth question requested the CRS respondent to indicate whether the sample person was born inside or outside of the United States. Respondents reported very consistently. The index of inconsistency was 2.7 (2.2 to 3.3) and 0.5 percent (0.4 to 0.5) of respondents changed answers when reinterviewed. Households with male sample persons showed less inconsistency than households with female sample persons, although both were low. Households with native sample persons showed less inconsistency (low) than households with foreign-born sample persons (high). Respondents who reported on mailback forms showed less inconsistency than respondents who reported to enumerators, although both were low.
If the sample person was born in the United States, then the question requested that the respondent report the name of the state in which the sample person was born. If the sample person was born outside of the United States, then the respondent was asked to report the name of the country where the sample person was born. These responses were grouped into 68 categories which are shown in Appendixes C and E. The categories included the 50 states, the District of Columbia, United States territories, and other countries and regions. The aggregate index was 3.2 (3.0 to 3.5) and approximately 3 percent (2.9 to 3.4) of CRS respondents changed answers during the CRS. There was some evidence that one or more of the model assumptions were not met for 12 categories. All subgroups showed low inconsistency. Households with male sample persons showed less inconsistency than households with female sample persons. Households with Hispanic sample persons showed less inconsistency than households with non-Hispanic sample persons. Respondents who reported on mailback forms showed less inconsistency than respondents who reported to enumerators.

We then collapsed the states into four regions of the United States (Northeast, North Central, South, and West), grouping responses into 21 categories. The aggregate index was even lower at 2.3 (2.1 to 2.5). Approximately 1.8 percent (1.6 to 2.0) of CRS respondents changed answers in the reinterview. The net difference rate was significantly different from zero for the “Northeast,” “U.S. state not reported,” and “Asia” categories suggesting that one or more of the model assumptions were not met.

**Citizenship (CRS 17, Census 14)**

As in the previous CRS, these data were reported very consistently in 2000. The data were significantly less inconsistent in 2000 than in 1990 \( z = -1.3 \). Table 23 shows the inconsistency level and aggregate index for both decades.

### Table 23. Aggregate response variance measures for citizenship by decade

<table>
<thead>
<tr>
<th>Inconsistency level</th>
<th>2000</th>
<th>1990</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Index of Inconsistency</td>
<td>Index of Inconsistency</td>
</tr>
<tr>
<td></td>
<td>Estimate</td>
<td>90-percent confidence interval</td>
</tr>
<tr>
<td>Low</td>
<td>9.8</td>
<td>9.0 to 10.8</td>
</tr>
</tbody>
</table>

In 2000, the aggregate index was 9.8 (9.0 to 10.8) and 1.8 percent (1.7 to 2.0) of CRS respondents changed answers in the reinterview. The categories “Yes, born in Puerto Rico, Guam, the U.S. Virgin Islands, or Northern Marianas” and “Yes, born abroad of American parent or parents” were rare.

The net difference rates were significantly different from zero for the “Yes, U.S. citizen by naturalization” and “No, not a citizen of the United States.” This suggests that the model assumptions of independence and replication may not have been met by the reinterview. The CRS found more respondents reported “Yes, U.S. citizen by naturalization” and fewer respondents reported “No, not a citizen of the United States” than on the census.
All subgroups showed low inconsistency. Households with non-Hispanic sample persons showed less inconsistency than households with Hispanic sample persons. Respondents who reported on mailback forms showed less inconsistency than respondents who reported to enumerators.

**Year of entry to the U.S. (CRS 18, Census 15)**

If the sample person was not born in the United States, then the respondent was asked what year the sample person came to live in the United States. This question has been modified since 1990. For 2000, this was a write-in question, whereas in 1990 ten response intervals were provided.

As shown in Table 24, the question from Census 2000 showed less inconsistency than the question from the 1990 census ($z = -2.5$).

**Table 24. Aggregate response variance measures for year of entry by decade**

<table>
<thead>
<tr>
<th></th>
<th>2000</th>
<th></th>
<th></th>
<th>1990</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Index of inconsistency</td>
<td>90-percent confidence interval</td>
<td>Index of inconsistency</td>
<td>90-percent confidence interval</td>
<td></td>
</tr>
<tr>
<td>Inconsistency level</td>
<td>Estimate</td>
<td>17.2 to 20.8</td>
<td>Inconsistency level</td>
<td>Estimate</td>
<td>21.1 to 25.2</td>
</tr>
<tr>
<td>Low</td>
<td>18.9</td>
<td></td>
<td>Moderate</td>
<td>23.0</td>
<td></td>
</tr>
</tbody>
</table>

We grouped the responses to this question into ten categories which are shown in Appendixes C and E. These data were reported with low inconsistency. The aggregate index was 18.9 (17.2 to 20.8) and 16.4 percent (14.9 to 18.0) of respondents changed answers between the census and the CRS. The net difference rates were statistically significant for the "1970 to 1974," "1960 to 1964," and "Before 1950" categories suggesting that the reinterview was not an independent replication of the census.

Households with female sample persons showed less inconsistency (low) than households with male sample persons (moderate). Households with non-Hispanic sample persons showed less inconsistency (low) than households with Hispanic sample persons (moderate). Respondents who reported on mailback forms showed less inconsistency (low) than respondents who reported to enumerators (moderate).

**Migration (CRS 19a, 19b, Census 16a, 16b)**

The CRS asked two migration questions. These questions ask about place of residence on April 1, 1995. Both questions have been slightly modified since 1990.

- **Live at current residence on April 1, 1995 (CRS 19a, Census 16a)**

  This question asked if the sample person lived at their current residence on April 1, 1995. For 2000, a separate write-in line was added for places outside the United States, whereas in 1990 this was combined with the United States write-in line.
Respondents answered this question with moderate inconsistency. The aggregate index of inconsistency was 22.2 (21.4 to 22.9). The index was low for the “Person is under 5 years old” category and moderate for the “Yes, this house,” “No, outside the United States,” and “No, different house in the United States” categories. The rare category “No, outside the United States” had the highest index, at 40.2 (36.7 to 44.0).

Approximately 12 percent (11.7 to 12.5) of CRS respondents changed answers. Among the respondents that changed answers when reinterviewed, approximately 70 percent (67.9 to 71.2) changed between “Yes, this house” and “No, different house in the United States.” The net difference rate was statistically different from zero for the “Yes, this house” and “No, different house in the United States” categories. The significant net difference rates show us that one or both of the model assumptions, independence and replication, were not met.

Households with non-Hispanic sample persons showed less inconsistency than households with Hispanic sample persons, although both were moderate. Households with native sample persons showed less inconsistency than households with foreign-born sample persons, although both were moderate. Respondents who reported on mail-back forms showed less inconsistency than respondents who reported to enumerators, although both were moderate.

Where lived in U.S. on April 1, 1995 (CRS 19b, Census 16b)

If the sample person was reported as living in a different house in the United States on April 1, 1995, then the respondent was asked where the sample person lived. Some changes have been made to this question. The respondent was asked for the zip code and the sequence of city, county, and state write-in lines were reordered for 2000.

After the respondent reported the city, town, or post office of where the sample person lived on April 1, 1995, they were then asked if the sample person lived inside the limits of that city or town. Respondents answered this question with high inconsistency. The index of inconsistency was 52.1 (49.4 to 55.1) and 16.1 percent (15.2 to 17.0) of respondents changed answers when reinterviewed. Approximately 56 percent (53.1 to 59.1) of the respondents that changed answers switched from “No” in the census to “Yes” in the CRS. The net difference rate was statistically significant for this question suggesting that at least one of the model assumptions was not met. The reinterview found more “Yes” responses.

Households with non-Hispanic sample persons showed less inconsistency than households with Hispanic sample persons, although both were high. Households with native sample persons showed less inconsistency than households with foreign-born sample persons, although both were high.
- **Place of residence on April 1, 1995**

If the sample person did not live at their current residence on April 1, 1995, then the respondent was asked to report the state or country where the sample person lived. These responses were grouped into the 68 categories shown in Appendixes C and E. These data were reported very consistently. The categories included the 50 states, the District of Columbia, United States territories, and other countries and regions. The aggregate index of inconsistency was 4.4 (3.9 to 4.9) and approximately 4 percent (3.7 to 4.7) of CRS respondents changed answers. The net difference rate for the "Arizona," "Colorado," and "Tennessee" categories were significantly different from zero suggesting that the reinterview was not independent and/or did not replicate the census conditions very well. All subgroups showed low inconsistency. Households with Hispanic sample persons showed less inconsistency than households with non-Hispanic sample persons.

We then collapsed the states into four regions of the United States (Northeast, North Central, South, and West), grouping responses into 21 categories. The aggregate index was even lower at 3.0 (2.5 to 3.5). Approximately 2 percent (1.9 to 2.6) of respondents changed answers in the reinterview.

**Disability (CRS 20a, 20b, 21a, 21b, 21c, 21d, Census 17a, 17b, 18a, 18b, 18c, 18d)**

On the census and the CRS there were two disability questions with subparts, which resulted in a total of six disability items. The 2000 questions changed significantly from the 1990 questions. New 2000 questions covered the major life activities of seeing and hearing and the ability to perform physical and mental tasks. Unless otherwise stated, these questions collected data on the disability of children five years and over as adults. The 1990 questions collected data only for persons 15 years and over.

- **Sensory impairment (CRS 20a, Census 17a)**

This question asked the respondent if the sample person had any blindness, deafness, or a severe vision or hearing impairment. These data were reported with moderate inconsistency between the census and the reinterview. The aggregate index of inconsistency was 47.2 (44.2 to 50.5) and 3.7 percent (3.5 to 4.0) of respondents changed answers when reinterviewed. Of the respondents that changed answers, approximately 63 percent (59.4 to 65.8) switched from "No" to "Yes." The net difference rate for the "Yes" category was statistically different from zero. This shows us that one or both of the model assumptions were not met. There were more "Yes" responses given during the CRS than the census.

Households with non-Hispanic sample persons showed less inconsistency (moderate) than households with Hispanic sample persons (high). Respondents who reported on mailback forms showed less inconsistency (moderate) than respondents who reported to enumerators (high).
Census 2000 Mail Response Rates

FINAL REPORT

This evaluation reports the results of research and analysis undertaken by the U.S. Census Bureau. It is part of a broad program, the Census 2000 Testing, Experimentation, and Evaluation (TXE) Program, designed to assess Census 2000 and to inform 2010 Census planning. Findings from the Census 2000 TXE Program reports are integrated into topic reports that provide context and background for broader interpretation of results.

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Decennial Statistical Studies Division

US Census Bureau
Helping You Make Informed Decisions
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EXECUTIVE SUMMARY

The response rate is a measure that represents the percentage of addresses eligible for Nonresponse Followup that returned questionnaires prior to the designation of the Nonresponse Followup universe. Response rates are the result of a combination of the level of respondent cooperation in Census 2000, the housing unit vacancy rate, and the quality of the Decennial Master Address File.

Preliminary analysis indicates that self-enumerated returns have a lower imputation rate than enumerator returns.\textsuperscript{1} Due to the higher level of data quality and the lower cost associated with self-enumerated responses relative to enumerator-collected responses, it is important for response rates to be as high as possible.

The mail response rate is defined as the number of mail returns received prior to the cut date for the Nonresponse Followup universe divided by the total number of housing units in mailback areas that were eligible for Nonresponse Followup. The final response rate is similar but includes all mail returns through the end of the year. Mail returns included in the response rates are actual paper questionnaires, interviews during the Telephone Questionnaire Assistance program, Internet data captures, Be Counted forms, and Coverage Edit Followup returns.

The mail response rate is different from the mail return rate. The mail return rate is essentially a measure of the percentage of occupied housing units that returned their questionnaires by April 18, 2000. It is a more useful rate for determining respondent cooperation and not as good as the response rate for measuring the Nonresponse Followup workload. The denominator of the mail return rate is calculated from the Hundred percent Census Edited File with the reinstated housing units. It includes all occupied housing units in mailback type of enumeration areas that were added to the address file prior to Nonresponse Followup and had addresses that were delivered by the United States Postal Service or during the Census Bureau delivery operation. The response rate denominator is larger than the return rate denominator, largely because the response rate denominator includes vacant housing units, Undeliverable As Addressed addresses, some addresses deleted in Update/Leave and Urban Update/Leave delivery, and deleted in either Nonresponse Followup or Coverage Improvement Followup.

What were the National Mail Response Rates?

The mail response rate as of April 18, 2000 was 64.3 percent, which was slightly lower than the 1990 mail response rate of 65.0 percent. This rate represents 75,608,035 mail returns that were received by April 18, 2000 out of a response rate denominator of 117,661,748 households. Another 3,703,140 questionnaires were returned after April 18, resulting in a final response rate of 67.4 percent, as of December 31, 2000.

Reflecting the higher response burden of the long form questionnaire, the short form mail response rate of 66.4 percent was 12.5 percentage points higher than the long form mail response rate of 53.9 percent. In 1990, the mail response rate for short forms and long forms were 65.9 percent and 60.6 percent, respectively.

Approximately 14.3 percent of mail returns were long forms, a substantially lower percentage than the overall 17.1 percent sampling rate. However, many residents with long forms held onto them and returned them after April 18. After that date, a larger proportion of long forms were returned than short forms. The final response rate was 69.1 percent for short forms and 59.4 percent for long forms.

Mailout/Mailback areas had a mail response rate of 65.4 percent, which is higher than either the Update/Leave areas mail response rate of 59.3 percent or the Urban Update/Leave areas mail response rate of 50.5 percent. Final response rates by type of enumeration area were 68.5 percent for Mailout/Mailback, 62.6 percent for Update/Leave, and 54.8 percent for Urban Update/Leave.

Most questionnaires were returned in the period between March 15, when questionnaires in Mailout/Mailback areas were mailed, and March 28. There were slight surges in the number of mail returns corresponding to the delivery of reminder postcards beginning on March 20 and on Census Day (April 1). These two surges in response were more pronounced for long forms than short forms.

Between the initial cut for the Nonresponse Followup universe on April 10 and the final cut on April 18, 2,535,382 questionnaires (2.2 percent) were received. Had the final Nonresponse Followup cut been on April 10, the Nonresponse Followup workload would have increased by this number of housing units.

---


The cut for the Nonresponse Followup universe was as of April 18; an additional 1,052,712 returns were received between April 18 and April 25, representing 28.4 percent of the mail returns checked in after April 18. These returns represent a potential decrease in the Nonresponse Followup workload of 2.5 percent, resulting in a potential cost savings of over $28.4 million. Therefore, work needs to be done to determine what is the optimal date for determining the Nonresponse Followup universe, by considering the cost benefits versus the operational challenges to other operations. In addition, research should be conducted to determine a more efficient way of updating the Nonresponse Followup lists.

After April 18, the number of mail returns declined until very few forms were being received by May 6. For the total return rate, 3,703,140 mail returns were checked in after April 18. This was an increase in the return rate of 3.1 percentage points. The last date on which questionnaires were checked in was October 19, 2000. The last date on which enough forms were received that resulted in an increase in the rate was June 15 for short forms and June 29 for long forms.

The mail response rate was compared with the mail return rate. The mail return rate as of April 18, was 74.1 percent, 9.9 percentage points higher than the mail response rate. The difference between the two rates is greater for short forms than long forms and greater for Urban Update/Leave and Update/Leave areas than for Mailout/Mailback areas.

The final response rate was compared to the final return rate. The final return rate is similar to the mail return rate but includes all mail returns through the end of the year 2000. The total final return rate was 78.4 percent, 11.0 percentage points higher than the final response rate of 67.4 percent. This is a greater difference than the difference in the mail response and return rates. The difference between the final return and the final response rates for long forms is about the same as the difference for short forms. However, the difference between the final return rate and the final response rate is greater in Urban Update/Leave and Update/Leave areas than in Mailout/Mailback areas.
1. BACKGROUND

This evaluation provides the response rates for Census 2000 and an analysis of the rates at the national level. The mail response rate is a measure of the Nonresponse Followup (NRFU) workload that identifies the percentage of Census 2000 addresses on the address file for mailback areas that were eligible for NRFU and returned their questionnaires by April 18, 2000. The final response rate is similar but also includes mail returns through the end of the year. This report also examines response rate differentials for long and short forms and for different types of enumeration areas.

1.1 Previous Censuses

Mail response rates were first measured for the 1970 Census. In 1970, the mail response rate was 78.3 percent. The mail response rate by form type is not available for the 1970 Census.

In 1980, the mail response rate was 75.0 percent, which is a decrease from the 1970 mail return rate. Similar to 1970, the mail response rate by form type is not available for the 1980 Census. The decrease in return rate from 1970 to 1980 was the beginning of a trend of decline in respondent cooperation, as a decrease in response rates also occurred between the 1980 and the 1990 censuses.

In the 1990 Census, the United States Postal Service (USPS) was the primary vehicle for delivering census questionnaires. Based on a master address list, the Census Bureau mailed questionnaires to about 86.2 million housing units in areas designated as being Mailout-Mailback (MO/MB). Occupants were asked to complete the forms and mail them back in the provided postage paid envelope. In areas designated as Update/Leave (U/L), enumerators visited approximately 10.3 million housing units, verified addresses, and left questionnaires for occupants to complete and mail back in the provided postage paid envelope (U.S. Bureau of the Census, 1999a).

In the 1990 Census, both a questionnaire and a mail reminder card were delivered to all housing units in the Mailout-Mailback universe. The reminder card was delivered on March 30, approximately seven days after the questionnaire mailout. Census Day was officially April 1.

The mail response rate was defined as the ratio of the number of housing units returning a census questionnaire by mail to the total number of housing units that were on the address file to receive a census questionnaire delivered by mail or by a census enumerator.

The date for the mail return rate varied by District Office (DO) type (Type 1, 2, 2A, and 3). District Offices are similar to Local Census Offices in 2000. There were 449 stateside DOs in 1990. Of these, 103 were Type 1 DOs, which were located in urban areas. Type 2 DOs were located in small cities, suburbs, and rural areas, accounting for 276 of the 449 DOs. Seventy-nine of these were Type 2A, which handled the Update/Leave operation in addition to
the Mailout/Mailback Questionnaires. Most of the 70 Type 3 DOs were located in rural, sparsely settled areas, and few were located in small cities. The date for the mail return rates in 1990 was April 19 for Type 1 DOs and April 28 for Type 2, 2A, and 3 (U.S. Bureau of the Census, 1991).

For the 1990 Census the overall mail response rate was approximately 65.0 percent (U.S. Bureau of the Census, 1991). The mail response rate was 65.9 percent for short forms and 60.6 percent for long forms, resulting in a difference of 5.3 percentage points between form types (U.S. Bureau of the Census, 1991).

1.2 Census 2000 Dress Rehearsal

The Census 2000 Dress Rehearsal was conducted in three areas: Sacramento, California; Columbia, South Carolina, and 11 surrounding counties; and Menominee County, Wisconsin, including the Menominee American Indian Reservation. Each site was selected because of its demographic and geographic characteristics to provide experience with some of the expected Census 2000 environments. The Sacramento site was entirely Mailout/Mailback, South Carolina site was a mixture of Mailout/Mailback and Update/Leave addresses, and the Menominee site was entirely Update/Leave.

There were four components of the Mailout/Mailback delivery: an advance letter, an initial questionnaire, a reminder card, and a “blanket” replacement questionnaire (mailed to all addresses). These items used first-class postage and were distributed by the USPS as part of the regular postal routes. The advance letter was mailed to each address between March 24 and 27, 1998. The initial questionnaire was mailed between March 28 and 31. The reminder card was sent to housing units between April 3 and 6. Replacement questionnaires were mailed between April 15 and 17. Census Day was officially April 18.

The Update/Leave methodology involved Census Bureau enumerators delivering questionnaires at the same time they updated maps and the list of addresses. The Update/Leave delivery of questionnaires took place between March 14 and April 10, 1998. In ZIP codes that consisted entirely of Update/Leave housing units, the USPS delivered an advance letter to “postal patrons” using third-class postage.

Under both methodologies, respondents were asked to mail back their questionnaires in provided postage paid envelopes.

Short and long form questionnaires were included in both delivery methodologies. Every housing unit received either a short or a long form. The long form sampling rate for the dress rehearsal varied within site.

Response rate was defined to include in its numerator the number of housing units in the mailback universe that returned a questionnaire that was not blank. The response rate denominator included the number of housing units in the mailback universe that were either
mailed a questionnaire or - in Update/Leave areas - received one delivered by a census enumerator. Housing units with an undeliverable status were included in these denominators.

Table 1 contains the mail response rates for the three Dress Rehearsal test sites by form type (short versus long). Dress Rehearsal response rates are typically lower than those for the census. This is due to the fact that the dress rehearsal does not have a “census environment.” A “census environment” allows for a higher response rate due to the publicity surrounding the census.

<table>
<thead>
<tr>
<th>Site</th>
<th>Total</th>
<th>Form Type</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Short</td>
<td>Long</td>
<td></td>
</tr>
<tr>
<td>Sacramento</td>
<td>53.0 %</td>
<td>55.4 %</td>
<td>40.7 %</td>
<td></td>
</tr>
<tr>
<td>South Carolina</td>
<td>53.4 %</td>
<td>55.4 %</td>
<td>43.7 %</td>
<td></td>
</tr>
<tr>
<td>Meadoville</td>
<td>39.4 %</td>
<td>40.6 %</td>
<td>32.4 %</td>
<td></td>
</tr>
</tbody>
</table>

1.3 Census 2000

In Census 2000, the questionnaire Mailout-Mailback system was the primary means of census taking. Cities, towns, and suburban areas with city-style addresses (house number and street name) as well as rural areas where city-style addresses are used for mail delivery comprised the Mailout-Mailback areas. Update/Leave areas consisted of addresses that are predominantly not city-style. Census enumerators delivered addressed questionnaires to Update/Leave housing units. Update/Leave enumerators also made any necessary corrections or additions to census maps and address lists as they delivered the questionnaires. In both delivery methodologies, the housing units were provided with first-class postage paid envelopes for returning their questionnaires.

1.3.1 Types of Mailback Questionnaires

Census 2000 included two types of questionnaires for mailback:

- A short form was delivered to approximately 83 percent of all housing units. This form allowed the respondent to list up to 12 household members. It provided space for reporting the basic population and housing data (i.e. name, relationship, age, sex, race, Hispanic origin, and tenure) for up to six household members and the housing unit.

- A long form was delivered to a sample – approximately 17 percent – of all housing units. This form allowed the respondent to list up to 12 household members. It included all the questions on the short form, as well as additional housing unit questions and additional person questions for up to six household members.
There is one difference between the Mailout/Mailback questionnaire and the Update/Leave questionnaire. The Update/Leave questionnaire gave the respondent the opportunity to correct address information.

1.3.2 Multiple Mailing Strategy

The Census Bureau used a mail strategy consisting of multiple contacts for Census 2000 in Mailout/Mailback areas. These contacts were:

- an advance notice letter to every mailout address that alerted households that the census form would be sent to them soon,
- a questionnaire to every mailout address, and
- a postcard to every mailout address that served as a thank you for respondents who had mailed back their questionnaire or as a reminder to those who had not.

This multiple mailing strategy used first-class postage for all mailing pieces in Mailout/Mailback areas. The volume for Mailout/Mailback areas was approximately 100 million pieces for each mailing.

There was also a mailout strategy used in Update/Leave areas for advance notice letters and reminder postcards. Advance notice letters were mailed to Update/Leave housing units that had “good” addresses using first-class mail. Reminder cards were sent to housing units in ZIP codes that consist entirely of Update/Leave housing units. The reminder postcards were addressed to “Residential Customer” and delivered using third-class postage. Consequently, some housing units received the advance notice letter and not the reminder card, some received the reminder card and not the advance notice letter, some received both, and some received neither. The expected volume for Update/Leave areas was about 22 million questionnaires (U.S. Bureau of the Census, 2001a).

1.3.3 Key Dates in Mailback Schedule

<table>
<thead>
<tr>
<th>Event</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Advance notice letter delivered</td>
<td>March 6 - March 8</td>
</tr>
<tr>
<td>Mailout of Questionnaire</td>
<td>March 13 - March 15</td>
</tr>
<tr>
<td>Delivery of Reminder Cards</td>
<td>March 20 - March 22</td>
</tr>
<tr>
<td>Census Day</td>
<td>April 1</td>
</tr>
<tr>
<td>Cut for Nonresponse Followup (NRFU)</td>
<td>April 11</td>
</tr>
<tr>
<td>Late Cut for NRFU</td>
<td>April 18</td>
</tr>
</tbody>
</table>
Update/Leave Enumeration Areas:

<table>
<thead>
<tr>
<th>Event</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Delivery of Advance Notice Letters</td>
<td>March 1 - March 3</td>
</tr>
<tr>
<td>Delivery of Questionnaires</td>
<td>March 3 - March 30</td>
</tr>
<tr>
<td>Delivery of Reminder Cards</td>
<td>March 27 - March 29</td>
</tr>
<tr>
<td>Census Day</td>
<td>April 1</td>
</tr>
<tr>
<td>Initial Cut for NRFU</td>
<td>April 11</td>
</tr>
<tr>
<td>Late Cut for NRFU</td>
<td>April 18</td>
</tr>
</tbody>
</table>

1.3.4 Delivery of Questionnaires in Other Languages

The Census Bureau mailed census forms in five other languages (Chinese, Korean, Spanish, Tagalog, and Vietnamese) to housing units that requested them. The advance notice letter provided the respondent with the opportunity to make this request.

2. METHODOLOGY

The data files used to calculate the mail response rates are:

- Decennial Master Address File (DMAF)
- Decennial Response File - Stage 2 (DRF-2)

2.1 Decennial Master Address File (DMAF)

The primary file used to calculate the mail response rates was the DMAF. We used this file to identify the housing units to include in the response rates. The DMAF contained variables that were used to limit the response rate denominator to housing units in mailback areas which were NRFU eligible. The MAILD variable from the DMAF identifies the date on which a mail return questionnaire was checked into the Data Capture Centers (DCCs). The DMAF also contains information on which form type (short versus long) was designated for each address. The definitions of the DMAF variables can be found in Appendix A.

2.2 Decennial Response File Stage 2 (DRF-2)

The DRF-2 is the file representing the capture of questionnaire data from Census 2000 and was used to determine which housing units had a valid mail return. We created a variable called DC_DRF from the RSOURCE variable on the DRF-2 to identify those addresses with a mail return. The DC_DRF variable was created based on all returns for an address on the DRF-2. This variable was merged onto the Decennial Statistical Studies Division's (DSSD’s) version of the DMAF in order to calculate the response rates. For information on how this variable was
defined, see Appendix B. The definitions of the DRF-2 variables used in calculating response rates can also be found in Appendix B.

2.3 Calculation of the Mail Response Rate

The mail response rate denominator included housing units in mailback areas that were eligible for NRFU. The mail response rate numerator included housing units in the denominator that had a valid mail return and a mail return check-in date of April 18, 2000 (the date of the cut for the NRFU universe) or earlier (variable MAILD, values of ‘0101’ through ‘0418’, inclusive). Addresses with a valid mail return but no MAILD date (MAILD values of ‘0000’, ‘0099’, and ‘2000’) were included in the mail response rate numerator if they did not have a NRFU or Coverage Improvement Followup (CIFU) data capture as determined using the DRF-2. The mail response rate was calculated for the geographic levels of tract, county, and state by summing the housing units up to each geographic level, dividing the numerator by the denominator, and rounding to the nearest tenth of a percentage point. The national mail response rate was created by summing the state numerators and denominators to the national level.

2.3.1 Mail Response Rate Denominator

Several criteria were used to identify addresses on the DMAF for the mail response rate denominator. Only housing units (GQFLG= 0 or 3) in mailback areas (Type of Enumeration Area (TEA) variable, values of 1, 2, 6, 7, or 9) were included in the denominator. Additionally, only addresses that were not pre-identified as having inadequate addresses for the mailout were included in the denominator (UAA variable*8). One of the DMAF variables, NRFU Universe (NRU variable, values of 1, 2, 3, or 4) was used to eliminate addresses not eligible for NRFU from the response rate denominator. The definitions of these DMAF variables can be found in Appendix A.

Separate mail response rate denominators were created for each of the three TEAs, for each of the two form types (short versus long), and for each TEA by form type. The three TEAs are Mailout/Mailback (TEA variable value of 1 or 6), Update/Leave (value of 2 or 9) and Urban Update Leave (UU/L) (value of 7). Questionnaire form type was determined using the ASAM variable (value of 1 for short form and 6 for long forms).

2.3.2 Mail Response Rate Numerator

For a housing unit to be in the mail response rate numerator, it had to be a mail return that was in the response rate denominator. Mail returns were determined using the DC_DRF variable from the DRF-2. An address had a valid mail return if this variable indicated that it had a data capture in the form of a paper mail return, an Internet return, a Be Counted form, a Telephone Questionnaire Assistance (TQA) return, or a Coverage Edit Followup (CEFU) return.
The MAILD variable from the DMAF was used to determine the date of a mail return’s check-in. If the MAILD variable indicated that a return for the housing unit was received on or before April 18, 2000 (‘0101’ ≤ MAILD ≤ ‘0418’), then the address also was in the mail response rate numerator.

There were some addresses with mail returns according to DC_DRF but no MAILD date (values of ‘0000’, ‘0099’, or ‘2000’). These addresses were assigned to the mail response rate numerator based on whether or not they had data captures in the NRFU or CIFU operations (DC_DRF variable digits 6 or 7). Only addresses with no mail returns on April 18, 2000 were supposed to be included in those two followup operations. Therefore, addresses with neither a NRFU nor a CIFU data capture were assigned to the mail response rate numerator.

2.4 Calculation of the Final Response Rate

Like the mail response rate, the final response rate is a measure of respondent participation in Census 2000. The difference is that the final response rate is not restricted to mail returns received before the cut for the NRFU universe. As with the mail response rates, the final response rates were calculated by dividing the numerator by the denominator and rounding to the nearest tenth of a percentage point.

2.4.1 Final Response Rate Denominator

The final response rates have the same denominators calculated from the DMAF as the mail response rates (see Section 2.3.1).

2.4.2 Final Response Rate Numerator

The final response rate numerator was calculated by including all valid mail returns as determined by the DC_DRF variable from the DRF-2 that were in the response rate denominator. Most of these mail returns had MAILD check-in dates between January 1 and October 19, 2000 (October 19 was the last day we received a mail return). Mail returns with no MAILD date which the DC_DRF variable showed with NRFU or CIFU data captures were assigned to the final response rate and not the mail response rate.

2.5 Calculation of the Daily Response Rates

The daily response rates were calculated in a manner similar to the mail and final response rates. For the cumulative daily response rates, the denominators were the same for all rates. The numerators for each date of the year 2000 were calculated by limiting the numerators to addresses with mail return check-in dates on or before the particular date. For instance, the daily cumulative response rate numerator for May 5 was limited to addresses with a MAILD value less than or equal to ‘0505’. As previously stated, the final date on which questionnaires with a MAILD date were received was October 19 (MAILD=‘1019’). To determine the daily increase
in the response rate, the numerators were calculated by limiting the numerators to addresses with mail return check-in dates on a particular date. For those mail returns in the denominator that did not have a valid MAILD date on the DMAF, we assigned a date of either April 18 or December 31 based on the existence of a NRFU or CIFU data capture. If these mail returns had neither a NRFU nor a CIFU data capture, then they were assigned a date of April 18. Those mail returns with either a NRFU or a CIFU data capture were assigned to the December 31 response rate.

2.6 Application of Quality Assurance Procedures

Quality Assurance procedures were applied to the design, implementation, analysis, and preparation of this report. A description of the procedures used is provided in the “Census 2000 Evaluation Program Quality Assurance Process.”

3. LIMITATIONS

3.1 Missing Check-in Dates for Some Mail Returns

Appendix C shows a table with nineteen categories into which all addresses in the response rate denominator can be grouped based on their values for the DRF-2 variable DC_DRF and the DMAF variable MAILD. The rows of data in the table depend on the values of the DC_DRF variable from the DRF-2. The columns in the table are the values of MAILD on the DMAF.

There were 418,845 valid mail returns (0.4 percent of the response rate denominator) for which the DMAF variable MAILD did not indicate a check-in date (cells 1A, 1B, 2A, 2B, 6A, 6B, 7A, and 7B of the table). These returns were assigned to either the mail response rate or the final response rate based on whether or not their addresses also had a NRFU and CIFU return. Housing units with a valid mail return, no check-in date, and no data capture for NRFU or CIFU were assigned a date of April 18 and included in the mail response rate. These 11,188 mail returns are shown in cells 1A, 2A, 6A, and 7A of the table. Mail returns without a valid MAILD value and with a data capture for NRFU or CIFU were assigned a date of December 31 and only included in the final response rate. These 407,657 housing units are shown in cells 1B, 2B, 6B, and 7B of the table. The other problem with the MAILD variable is that it only reflects the date of check-in at the DCC, not the date on which a questionnaire was completed, mailed, or even the date on which the form was received by the DCC.

3.2 No Precise Cut-off Date for Nonresponse Followup Universe

A housing unit was counted toward the mail response rate numerator if MAILD indicated a check-in date prior to the late cut for NRFU. That date was set at April 18, 2000 but users of the rates should keep in mind that there was some noise in the data with respect to the date since the NRFU universe was generated on a flow basis. That is, the NRFU universe of all housing units
was not set instantaneously at midnight of April 18. The actual cut might have fallen on either side of that date for some housing units.

3.3 Housing Units in Denominator Not in Mailout

Some housing units on the DMAF from Mailout/Mailback and Update/Leave areas were added after the mailback universe was set. Hence, they are being counted toward the response rate denominator but did not have a chance to respond by mailback means prior to the late cut for NRFU.

3.4 Issues with Comparison of Results to Previous Censuses

The definition of mail response rate for Census 2000 is not exactly the same as that from previous censuses. These differences are the following:

- The TEAs in previous censuses were defined differently than those in 2000 and included different parts of the country.
- The timing of the mailout and the cut for NRFU were different for each of the 1970, 1980, 1990, and 2000 censuses.

Specifically for comparing 2000 to 1990:

- Like the 2000 final response rates, 1990 mail response rates at the state, county, and tract levels in 1990 were calculated based on all returns during the year. The 1990 national response rate was calculated with returns through the cut for NRFU.

3.5 Form Type of Mail Returns Based on Form Type in Mailout

Since this report does not analyze item non-response on valid mail returns, it is possible that some long forms that were returned did not contain complete data. The response rate analysis by form type was done based on which form the addresses were sent by the Census Bureau.

4. RESULTS

4.1 What were the Response Rates for the Nation?

The results presented in this report are for the fifty states and the District of Columbia. They do not include the response rate for Puerto Rico. There were 117,661,748 housing units in mailback areas in Census 2000 that were eligible for NRFU and to which the USPS or the Census Bureau attempted to deliver questionnaires. This number is the national response rate denominator. Of this number, 20,082,777 housing units or 17.1 percent of the housing units received a long form
questionnaire. Thus, the sampling rate for the long forms was slightly above one in six or 16.7 percent.

Table 2 shows the total mail response rates and these rates by form type based on mail returns received on or before April 18, 2000. The data presented in the table are grouped into three TEAs - MO/MB (TEAs 1 and 6), U/L (TEAs 2 and 9), and UU/L (TEA 7). The national mail response rate was 64.3 percent, meaning that 75,608,035 housing units returned their questionnaires in time to avoid the necessity of enumeration in Nonresponse Followup. This mail response rate is less than one percentage point below the mail response rate of 65.0 percent in the 1990 Census (U.S. Bureau of the Census, 1991). The numerators and denominators for the mail response rates by TEA can be found in Appendix D.

The table shows that 66.4 percent or 64,792,554 housing units who received short forms returned them by April 18, 2000. In contrast, only about 53.9 percent of housing units who were delivered long forms returned them by that date. This 12.5 percentage point discrepancy means that a higher proportion of the data was collected by Census Bureau interviewers in NRFU on long forms than was the case for short form households. For information about the quality of data collected during NRFU for long forms and short forms, see Census 2000 Evaluation B.1: Analysis of the Imputation Process for 100 Percent Household Population Item (U.S. Bureau of the Census, 2001b). Approximately 14.3 percent of mail returns were long forms, a substantially lower percentage than the overall 17.1 percent sampling rate.

Table 2. National Mail Response Rates as of April 18, 2000 by Form Type and Type of Enumeration Area for the Fifty States and the District of Columbia

<table>
<thead>
<tr>
<th>Form Type</th>
<th>Total</th>
<th>Short</th>
<th>Long</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>TOTAL</td>
<td>64.3%</td>
<td>66.4%</td>
<td>53.9%</td>
<td>12.5%</td>
</tr>
<tr>
<td>Mailout/Mailback</td>
<td>65.4%</td>
<td>67.3%</td>
<td>54.6%</td>
<td>12.7%</td>
</tr>
<tr>
<td>Update/Leave</td>
<td>59.3%</td>
<td>61.9%</td>
<td>51.9%</td>
<td>10.0%</td>
</tr>
<tr>
<td>Urban Update/Leave</td>
<td>50.5%</td>
<td>52.2%</td>
<td>41.2%</td>
<td>11.0%</td>
</tr>
</tbody>
</table>

Source: DMAF and DRF-2.

The difference in response rates by form type is not surprising, given the difference in response burden between the short form and the long form. The short form only included seven questions. Person one was asked for name, age, sex, race, Hispanic ethnicity, and tenure. In addition to name, age, sex, race, and Hispanic ethnicity, persons two through six were also asked relationship to person one. In comparison, the long form had a total of 53 questions on a variety of topics including income, utilities, ancestry, and occupation. This gap between short form mail response rates and long form mail response rates varies by TEA, with MO/MB households having the greatest difference in response rates by form type and households in U/L areas having the smallest gap.
Another noticeable variation in response rates is that housing units in MO/MB areas returned a much greater proportion (65.4 percent) of their forms than those in U/L (59.3 percent) and, especially, UU/L (50.5 percent) areas. One explanation for this difference is that MO/MB areas are generally more prosperous and have greater exposure to media advertising the census than more sparsely populated U/L areas and inner-city UU/L areas. Another potential explanation is the delivery schedule for U/L and UU/L areas is longer than the schedule for MO/MB (March 3-30 vs. March 13-15). Residents in U/L and UU/L areas that received their questionnaires at the end of the delivery schedule had less time to fill them out than residents in MO/MB areas that received their questionnaires at the end of the MO/MB schedule. Additionally, there are often problems with postal delivery in UU/L and U/L areas and those households were less likely to receive the advance notice and reminder postcard. As a result of this discrepancy, a smaller proportion of residents of U/L and UU/L areas were self-enumerated than residents of primarily urban and suburban MO/MB areas with city-style addresses. For the mail response rates by form type for each of the fifty states, the District of Columbia, and Puerto Rico, see U.S. Bureau of the Census, 2002b.

Table 3 shows the final response rates as of December 31, 2000 by TEA and form type. The number of households in mailback areas that returned their questionnaires after April 18, 2000 was 3,703,140, increasing the final response rate by 3.1 percentage points over the mail response rate. The final response rate of 67.4 percent indicates the percentage of addresses in mailback areas that returned their questionnaires by the end of the year. Note the last form which was received and processed was October 19, 2000.

Table 3. National Final Mail Response Rates as of December 31, 2000 by Form Type and Type of Enumeration Area for the Fifty States and the District of Columbia

<table>
<thead>
<tr>
<th>Type of Enumeration</th>
<th>Total</th>
<th>Short</th>
<th>Long</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>TOTAL</td>
<td>67.4%</td>
<td>69.1%</td>
<td>59.4%</td>
<td>9.6%</td>
</tr>
<tr>
<td>Mailout-Mailback</td>
<td>68.5%</td>
<td>70.0%</td>
<td>60.4%</td>
<td>9.6%</td>
</tr>
<tr>
<td>Update/Leave</td>
<td>62.6%</td>
<td>64.6%</td>
<td>57.0%</td>
<td>7.6%</td>
</tr>
<tr>
<td>Urban Update/Leave</td>
<td>54.8%</td>
<td>56.1%</td>
<td>47.5%</td>
<td>8.7%</td>
</tr>
</tbody>
</table>

Source: DMAF and DRF-2.

Most of the patterns in the response rates revealed in Table 3 are similar to those in Table 2, though final response rates for all groups are, of course, higher. Short form final response rates (69.1 percent) are higher than long form final response rates (59.4 percent) and this difference is greatest in MO/MB areas. The MO/MB areas have the highest final response rate (68.5 percent) among TEAs and UU/L areas have the lowest (54.8 percent). One noteworthy difference between final and mail response rates is that the discrepancy between short form response rates and long form response rates is substantially lower for final response rates (9.6 percent) than for mail response rates (12.5 percent). Many households with long forms returned those forms at a
later date than households who received short forms. The form type gap decline in the final response rates was true for all TEAs.

Table 4 compares the mail response rates and the final response rates for the national total and for each of the three TEAs. The data reveal that there was a greater increase in UU/L and U/L areas between April 18 and the end of the year than in MO/MB areas. Thus, the gap among the TEAs that is evident in the mail response rates is not as great for the final response rates. The MO/MB mail response rate is 6.1 percentage points higher than the U/L mail response rate, while the MO/MB final response rate is about 5.9 percentage points higher than the U/L final response rate.

Table 4. Comparison of Mail Response Rates as of April 18, 2000 and Final Response Rates as of December 31, 2000 by Type of Enumeration Area for the Fifty States and the District of Columbia

<table>
<thead>
<tr>
<th>Type of Enumeration</th>
<th>4/18/2000</th>
<th>12/31/2000</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>TOTAL</td>
<td>64.3%</td>
<td>67.4%</td>
<td>3.1%</td>
</tr>
<tr>
<td>Mailout-Mailback</td>
<td>65.4%</td>
<td>68.5%</td>
<td>3.1%</td>
</tr>
<tr>
<td>Update/Leave</td>
<td>59.3%</td>
<td>62.6%</td>
<td>3.3%</td>
</tr>
<tr>
<td>Urban Update/Leave</td>
<td>50.5%</td>
<td>54.8%</td>
<td>4.3%</td>
</tr>
</tbody>
</table>

Source: DMAF and DRF-2.

In Table 5, we compare mail response rates and final response rates by TEA for short forms. The patterns of these data are similar to those observed in Table 4, although the increase from mail response rates to final response rates (2.7 percent) is smaller for short forms than for the overall response rates (3.1 percent).

Table 5. Comparison of Mail Response Rates as of April 18, 2000 and Final Response Rates as of December 31, 2000 for Short Forms by Type of Enumeration Area for the Fifty States and the District of Columbia

<table>
<thead>
<tr>
<th>Type of Enumeration</th>
<th>4/18/2000</th>
<th>12/31/2000</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>TOTAL</td>
<td>66.4%</td>
<td>69.1%</td>
<td>2.7%</td>
</tr>
<tr>
<td>Mailout-Mailback</td>
<td>67.3%</td>
<td>70.0%</td>
<td>2.7%</td>
</tr>
<tr>
<td>Update/Leave</td>
<td>61.9%</td>
<td>64.6%</td>
<td>2.6%</td>
</tr>
<tr>
<td>Urban Update/Leave</td>
<td>52.2%</td>
<td>56.1%</td>
<td>4.0%</td>
</tr>
</tbody>
</table>

Source: DMAF and DRF-2.

Table 6 shows the same rates as Tables 4 and 5, but for long forms. It is clear that a particularly large proportion of long form households in all areas returned mailback questionnaires after April 18, as compared to the short forms (Table 5).
Table 6. Comparison of Mail Response Rates as of April 18, 2000 and Final Response Rates as of December 31, 2000 for Long Forms by Type of Enumeration Area for the Fifty States and the District of Columbia

<table>
<thead>
<tr>
<th></th>
<th>As of:</th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>4/18/2000</td>
<td>12/31/2000</td>
<td>Difference</td>
<td></td>
</tr>
<tr>
<td>TOTAL</td>
<td>53.9%</td>
<td>59.4%</td>
<td>5.6%</td>
<td></td>
</tr>
<tr>
<td>Mailout/Mailback</td>
<td>54.6%</td>
<td>60.4%</td>
<td>5.7%</td>
<td></td>
</tr>
<tr>
<td>Update/Leave</td>
<td>51.9%</td>
<td>57.0%</td>
<td>5.1%</td>
<td></td>
</tr>
<tr>
<td>Urban Update/Leave</td>
<td>41.2%</td>
<td>47.5%</td>
<td>6.3%</td>
<td></td>
</tr>
</tbody>
</table>

Source: DMAF and DRF-2.

4.2 What were the Daily Response Rates?

Figure 1, as shown in Appendix E, shows the cumulative mail response rates by form type for each day from March 3 until April 18, 2000. These dates correspond to the start of questionnaire delivery by Census Bureau staff in U/L areas and the cut for the NRFU universe, respectively. Addresses for which mail returns were received after April 18 were still visited by enumerators in NRFU. The x-axis on the figure shows the date and the y-axis shows the cumulative response rate for each date. The light-shaded line indicates the response rates for long forms, the medium-shaded line for short forms, and the thickest and darkest line is the total cumulative daily response rate. The data for Figures 1 - 4 can be found in Appendices F and G. Appendix F shows the daily increase and cumulative mail returns for both the response rate numerator and the response rate, as well as key census dates. Appendix G-1 shows the same data for short forms and Appendix G-2 for long forms.

As indicated by Figure 1, the response rates gradually increased after the beginning of U/L delivery until about March 15. On that date, the mailout of questionnaires (March 13 through 15) in MO/MB areas caused a surge in the response rates as a large majority of households received their questionnaires and many began to return them. Due to the time required for the USPS to deliver mail, there is approximately a two day lag between the date that households mailed their forms and their check-in at the DCCs. As expected, based on the lower overall response rates for long forms, the line indicating long form response rates increases more gradually than the lines for total and short form response rates. Within a week of the mailout of questionnaires, a substantial gap is evident between long form response rates and the higher short form and total response rates. Since most questionnaires are short forms, it is not surprising that the pattern of returns for short forms is parallel but slightly higher than that for the total response rate.

Aside from the initial surge in mail returns beginning March 15, the general pattern evidenced in Figure 1 is one in which the response rate increased rapidly for a few weeks and then began to level off. A second period of accelerated returns after the March 15 to 17 period occurred around March 20 with declines in the slope of the lines after March 23 and March 28. By the cut for the
NRFU universe on April 18, the increase in the response rates has become gradual, indicating that most households who are likely to return their forms had done so on that date.

Figure 2 (see Appendix E) better reveals some of the patterns mentioned above. This figure shows the daily increase of the response rates rather than the cumulative rates for each date from March 3 through April 18, 2000. As in Figure 1, different lines indicate the mail returns for the total and for each form type. This figure reveals certain interesting patterns in the daily return of questionnaires. As described before, a higher proportion of short form mail returns were received at earlier dates. Due to the greater amount of time and effort in filling out the long form, many long form households took longer to return their questionnaires. The initial peak period of returns after the mailout was much greater for short forms than long forms and occurred on earlier days. On March 15, 2.8 percent of short forms were returned and 1.0 percent of long forms were checked in. Two days later, on March 17, 4.6 percent of short forms were checked in and 1.9 percent of long forms were received.

As Figures 1 and 2 show, most short form mail returns came in between March 15 and March 28. Long forms were returned in the greatest numbers between March 20 and April 1. In fact, contrary to the short form pattern, the March 27/28 spike in returns was relatively much greater for long forms than the March 16/17 spike. For most of the period after March 28, long forms were actually being returned at a higher rate than short forms and the gap between the cumulative response rates for the two form types decreased. This is clear in Figure 2 which shows the line for long forms to be higher than that for short forms for almost every date after March 28. This indicates that a late cut for NRFU (April 18) resulted in a lower long form workload for NRFU, as compared to an April 10 date, and resulted in reducing the respondent burden. However, the rate of returns for both form types was well below one percent for every date after April 10.

The data indicate an increase in mail returns after the reminder postcards were mailed between March 20 and March 22. For both long forms and short forms, the greatest increase in mail response rates occurred on these dates and the days immediately following. The DCCs received short form returns at an especially high rate from March 20 through 23, with a peak daily increase of 5.2 percentage points on March 22, 2000. For long forms, this peak occurred from March 21 through 24 with the greatest daily increase of 4.2 percentage points on March 23 and 24.

Figure 2 also indicates that households, particularly those with long forms, exhibited some tendency to hold their questionnaires until Census Day (April 1, 2000). Figure 2 shows a major spike in long form returns and a smaller increase in short form returns on April 3 and 4, two days after Census Day. Between the initial cut for NRFU on April 10 and the final cut on April 18, households continued to send in mail returns at a substantial, though relatively low and dwindling, rate. During that period, 626,467 long forms or 3.1 percent of long forms were returned and 1,908,915 short forms or 2.0 percent of short forms were checked in. Without a final NRFU universe cut on April 18, the NRFU workload would have been increased by this number of housing units.
Figure 3 (see Appendix E) shows the increase in response rates by form type for the entire year of 2000. The left side of this figure is the same as Figure 1, but Figure 3 extends the timeline of cumulative mail returns from April 18 to December 31. The figure reveals that the response rates leveled off after April 18 with a gradually flattening slope for all three lines. The pattern was similar for the different form types although the gap in rates between long and short forms gradually narrowed as time passed. For the total response rate, 3,703,140 mail returns were checked in after April 18. These forms resulted in an increase in the response rate of 3.1 percentage points. Between April 18 and the end of the year, the short form response rate increased by 2.6 percentage points (2,588,285 housing units) and the long form increased by 5.6 percentage points (1,114,855 housing units). For nearly every single date after March 28, the daily percentage increase in response rate was greater for long forms than for short forms. As Appendices F and G show, the last confirmed date on which questionnaires were checked in was October 19, 2000, when three short forms were received. Prior to that day, 50 short forms and 13 long forms were checked in to the DCCs on September 15. The last date for which we have check-ins which resulted in a rate increase was June 15 for short forms when the short form response rate reached 68.7 percent. For long forms, this date was June 29 when the long form response rate leveled off at 58.9 percent.

Figure 4, as shown in Appendix E, is an extension of Figure 2 through the end of 2000. It shows the daily increase in the response rates by form type for the entire year. After April 18, the number of mail returns continued to decline until very few forms were being received by May 6. As noted above, a relatively higher increase was observed for long forms than short forms for these mail returns in late April, May, and June. The figure shows several small weekly peaks on Fridays in May when a substantial number of forms were checked in to the DCCs. It appears that shipments of mail returns may have arrived at the DCCs on Fridays or that the DCC staff may have held mail returns during the week to check in on Friday. The largest single-day receipt of mail returns after April 18 was on June 15 when 95,721 long forms and 146,022 short forms were checked in.

The final increase in the response rates that appears on Figure 4 is on December 31, 2000. Those 407,657 questionnaires are the mail returns for which no mail return check-in date was recorded and for which there was a NRFU or CIFU data capture in addition to a mail return data capture. Since only mail returns received after April 18 could be in the NRFU or CIFU workloads, we determined that these mail returns came in after that date. We assigned a check-in date of December 31 to these mail returns and they were included in the final response rate. Mail returns without a check-in date that were not in the NRFU and CIFU universe were assigned a date of April 18 and included in the mail response rate.

The data presented in Figure 4 and in Appendices F and G show the potential effect on the NRFU workload of using a later cut date for the NRFU universe. In between April 19 and April 25, 1,052,712 mail returns were checked in, representing 28.4 percent of the returns received after April 18. If the final NRFU cut had occurred one week later, around April 25 instead of April 18, then the NRFU workload would have been reduced by 1,052,712 housing.
units, or about 2.5 percent of the NRFU workload. This reduction in the workload would have saved close to $28.4 million, given that the cost of enumerating one housing unit in NRFU is just under $27 (see U.S. Bureau of the Census, 2002c). Since mail returns that were received after April 18 were disproportionately long forms, the savings were potentially even greater. If the cut for the NRFU universe had been delayed one more week until May 2, then the NRFU workload would have been reduced by approximately 598,000 additional housing units. However, a later start of the NRFU operation, despite a lower workload, could result in greater scheduling challenges.

Some of the daily fluctuation of mail returns observed in Figures 2 and 4 can be explained by the effect of the day of the week. More questionnaires were checked in on Thursdays (17.7 percent of all mail returns during the year), Fridays (16.4 percent), and Wednesdays (16.3 percent) than on other days of the week. Relatively few questionnaires came in on Sundays (9.3 percent) and Saturdays (11.0 percent). The dearth of check-ins on Sunday is probably the result of the fact that the USPS does not normally deliver mail on Sunday and that the DCCs worked fewer hours on weekends and thus checked in fewer forms on those days. Also, if respondents held their questionnaires until the beginning of a work week (Monday) to mail, then their forms would likely have arrived Wednesday or Thursday at the DCCs, explaining the increase in check-ins on those days.

4.3 How much did the Response Rates Differ from Census 2000 Return Rates?

Table 7 compares the mail response rates for Census 2000 to the mail return rates. Mail return rate is essentially a measure of the percentage of occupied housing units that returned their questionnaires by April 18, 2000. It is a more useful rate for determining respondent cooperation and not as good as the response rate for measuring the NRFU workload. The denominator of the mail return rate is calculated from the Hundred percent Census Edited File with the reinstated housing units (HCEF D'). It includes all occupied housing units in mailback TEAs that were added to the address file prior to NRFU and had addresses that were delivered by the USPS or during the Census Bureau delivery operation. The March 2001 MAF extract provided information on which addresses were added prior to NRFU. The response rate denominator (117,661,748 housing units) is larger than the return rate denominator (101,398,131), largely because the response rate denominator includes vacant housing units, Undeliverable As Addressed (UAA) addresses, some addresses deleted in U/L and UU/L delivery, and deleted in either NRFU or CIFU. The return rate numerator (75,163,020 housing units) is calculated similarly to the response rate numerator (75,608,035 housing units). For more information on mail return rates and their calculation see U.S. Bureau of the Census, 2002b.

The first column of data in Table 7 shows the mail response rates broken down by total, form type, TEA, and form type and TEA. The next column shows the equivalent mail return rates and the last column shows the difference between the two rates. The total national mail return rate was 74.1 percent, 9.9 percentage points higher than the mail response rate. The difference
between the two rates is greater for short forms than long forms and greater for UU/L and U/L than for MO/MB areas.

Table 7. Mail Response and Mail Return Rates as of April 18, 2000 by Form Type and Type of Enumeration for the Fifty States and the District of Columbia

<table>
<thead>
<tr>
<th>Rate</th>
<th>Response</th>
<th>Return</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>TOTAL</td>
<td>64.3%</td>
<td>74.1%</td>
<td>9.9%</td>
</tr>
<tr>
<td>Form Type</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Short</td>
<td>66.4%</td>
<td>76.4%</td>
<td>10.0%</td>
</tr>
<tr>
<td>Long</td>
<td>53.9%</td>
<td>63.0%</td>
<td>9.2%</td>
</tr>
<tr>
<td>Type of Enumeration</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mailout/Mailback</td>
<td>65.4%</td>
<td>75.1%</td>
<td>9.7%</td>
</tr>
<tr>
<td>Update/Leave</td>
<td>59.3%</td>
<td>69.6%</td>
<td>10.3%</td>
</tr>
<tr>
<td>Urban Update/Leave</td>
<td>50.5%</td>
<td>63.7%</td>
<td>13.1%</td>
</tr>
<tr>
<td>Form Type</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>and Type of</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Enumeration</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Short</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mailout/Mailback</td>
<td>67.3%</td>
<td>77.2%</td>
<td>9.9%</td>
</tr>
<tr>
<td>Update/Leave</td>
<td>61.9%</td>
<td>72.3%</td>
<td>10.4%</td>
</tr>
<tr>
<td>Urban Update/Leave</td>
<td>52.2%</td>
<td>65.7%</td>
<td>13.5%</td>
</tr>
<tr>
<td>Long</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mailout/Mailback</td>
<td>54.6%</td>
<td>63.4%</td>
<td>8.8%</td>
</tr>
<tr>
<td>Update/Leave</td>
<td>51.9%</td>
<td>61.9%</td>
<td>10.0%</td>
</tr>
<tr>
<td>Urban Update/Leave</td>
<td>41.2%</td>
<td>52.3%</td>
<td>11.1%</td>
</tr>
</tbody>
</table>

Source: HCEF D*, DMAF, DRF-2, and March 2001 MAF Extract.

Table 8 compares the final return and final response rates by form type and TEA. The final return rate is similar to the mail return rate but includes all mail returns through the end of the year 2000. The total final return rate was 78.4 percent (79,530,100 housing units), 11.0 percentage points higher than the 67.4 percent (79,311,175) final response rate. This is a greater difference than the difference in the mail response and return rates. The differences between final return and response rates are about the same for both form types and are greater in UU/L and U/L areas than in MO/MB areas.
Table 8. Final Response and Final Return Rates as of December 31, 2000 by Form Type and Type of Enumeration for the Fifty States and the District of Columbia

<table>
<thead>
<tr>
<th>Rate</th>
<th>Response</th>
<th>Return</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>TOTAL</td>
<td>67.4%</td>
<td>78.4%</td>
<td>11.0%</td>
</tr>
<tr>
<td>Form Type</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Short</td>
<td>69.1%</td>
<td>80.1%</td>
<td>11.0%</td>
</tr>
<tr>
<td>Long</td>
<td>59.4%</td>
<td>70.5%</td>
<td>11.1%</td>
</tr>
<tr>
<td>Type of Enumeration</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mailout-Mailback</td>
<td>68.5%</td>
<td>78.6%</td>
<td>10.1%</td>
</tr>
<tr>
<td>Update/Leave</td>
<td>62.6%</td>
<td>77.9%</td>
<td>15.3%</td>
</tr>
<tr>
<td>Urban Update/Leave</td>
<td>54.8%</td>
<td>70.8%</td>
<td>16.0%</td>
</tr>
<tr>
<td>Form Type and Type of Enumeration</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Short</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mailout-Mailback</td>
<td>70.0%</td>
<td>80.1%</td>
<td>10.1%</td>
</tr>
<tr>
<td>Update/Leave</td>
<td>64.6%</td>
<td>79.9%</td>
<td>15.4%</td>
</tr>
<tr>
<td>Urban Update/Leave</td>
<td>56.1%</td>
<td>72.3%</td>
<td>16.2%</td>
</tr>
<tr>
<td>Long</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mailout-Mailback</td>
<td>60.4%</td>
<td>69.9%</td>
<td>9.5%</td>
</tr>
<tr>
<td>Update/Leave</td>
<td>57.0%</td>
<td>72.1%</td>
<td>15.1%</td>
</tr>
<tr>
<td>Urban Update/Leave</td>
<td>47.5%</td>
<td>62.5%</td>
<td>15.0%</td>
</tr>
</tbody>
</table>

REFERENCES


Appendix A: Decennial Master Address File (DMAF) Variable Definitions

<table>
<thead>
<tr>
<th>Variable</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>ST</td>
<td>Collection FIPS State Code</td>
</tr>
<tr>
<td>COU</td>
<td>Collection FIPS County Code</td>
</tr>
<tr>
<td>TRACT</td>
<td>Collection Census Tract</td>
</tr>
</tbody>
</table>
| MAFID | MAF and DMAF ID  
characters 1-2 = state code when the MAF ID was assigned  
characters 3-5 = county code when the MAF ID was assigned  
characters 6-12 = control ID |
| TEA | Type of Enumeration Area  
1 = Mailout Mailback  
2 = Update Leave  
3 = List Enumerate  
4 = Remote List Enumerate  
5 = Rural Update Enumerate  
6 = Military in Update Leave Area  
7 = Urban Update Leave  
8 = Urban Update Enumerate  
9 = Update Leave (converted from TEA 1) |
| GQFLG | Group Quarters Housing Unit Flag  
0 = Housing Unit  
1 = Special Place  
2 = Group Quarters  
3 = GQ Embedded Housing Unit |
| ASAM | A Priori Sample  
1 = Short Form  
6 = Long Form |
| NRU | Nonresponse Followup Universe  
0 = Universe not set  
1 = Not in NRFU; data received (This indicates that a form was checked in; it does not guarantee that the form has any data.)  
2 = Not in NRFU; but NRD, NRS, NRC and NRPOP will be set by Update/Enumerate or List/Enumerate  
3 = In NRFU, Nonresponse  
4 = In NRFU, Too late for mailout |
DC_DRF(12) Source of Data Capture
0 = None
1 = Some Data Capture

The types of data capture for housing units are -
(1) Mail Return (RSOURCE: 1, 4 - 10)
(2) Telephone Questionnaire Assistance (TQA) (RSOURCE: 31)
(3) Internet (RSOURCE: 30)
(4) Be Counted Form (BCF) (RSOURCE: 11, 12)
(5) CEFU Data Capture (RSOURCE: 34 - 36)
(6) NRFU Data Capture (RSOURCE: 17 - 21)
(7) CIFU Data Capture (RSOURCE: 22 - 24)
(8) TQA/BCF (RSOURCE: 3, 32, 33)
(9) List Enumerate/Update Enumerate (RSOURCE: 13 - 16)
(10) Group Quarters (RSOURCE: 25 - 29)
(11) Orphans (RSOURCE: 37)
(12) Other (RSOURCE: -1)

MAILD Mail Return Check-in Month and Day
0000 = No Mail Return Check-in
0099 = Reverse Check-in
0101 - 1231 = Check-in Day of 1st Return
2000 = Check-in, Date Unknown

UAA Undeliverable As Addressed (UAA)
0 = No UAA check-in
1 = UAA check-in in NPC only
2 = UAA check-in in NPC; in LCO check-in; no LCO check-out
3 = UAA check-in in NPC; no LCO check-in; in LCO check-out
4 = UAA check-in in NPC; in LCO check-in; in LCO check-out
5 = No UAA check-in in NPC; in LCO check-in; no LCO check-out
6 = No UAA check-in in NPC; no LCO check-in; in LCO check-out
7 = No UAA check-in in NPC; in LCO check-in; in LCO check-out
8 = Not enough Address information - Excluded from the Mailout

*This is a DRF2 variable and is based on the RSOURCE variable from the DRF-2. It was appended to the DMAF SAS dataset produced by the DSSD.*
Appendix B: Decennial Response File Stage 2 (DRF-2) Variable Definitions

<table>
<thead>
<tr>
<th>RST</th>
<th>Collection FIPS State Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>RUID</td>
<td>Unit ID Number (DMAF)</td>
</tr>
<tr>
<td></td>
<td>characters 1-2 = state (when MAF ID was assigned)</td>
</tr>
<tr>
<td></td>
<td>characters 3-5 = county</td>
</tr>
<tr>
<td></td>
<td>characters 6-12 = sequence ID</td>
</tr>
<tr>
<td>RSOURCE</td>
<td>Source of Return</td>
</tr>
<tr>
<td></td>
<td>-1 = Not Computed</td>
</tr>
<tr>
<td></td>
<td>1 = Paper mail back questionnaires from mail out</td>
</tr>
<tr>
<td></td>
<td>2 = Paper mail back questionnaires from TQA mail out WITH ID</td>
</tr>
<tr>
<td></td>
<td>3 = Paper mail back questionnaires from TQA mail out with NO ID</td>
</tr>
<tr>
<td></td>
<td>4 = Paper mail back questionnaires from Update Leave</td>
</tr>
<tr>
<td></td>
<td>5 = Paper mail back questionnaires from Update Leave ADD</td>
</tr>
<tr>
<td></td>
<td>6 = Paper mail back questionnaires from Update Leave SUBSTITUTE</td>
</tr>
<tr>
<td></td>
<td>7 = Paper mail back questionnaires from Urban Update Leave</td>
</tr>
<tr>
<td></td>
<td>8 = Paper mail back questionnaires from Urban Update Leave ADD</td>
</tr>
<tr>
<td></td>
<td>9 = Paper mail back questionnaires from Urban Update Leave SUBSTITUTE</td>
</tr>
<tr>
<td></td>
<td>10 = Paper mail back questionnaires from Request for Foreign Language</td>
</tr>
<tr>
<td></td>
<td>11 = Paper mail back questionnaires from BCF marked as whole household</td>
</tr>
<tr>
<td></td>
<td>12 = Paper mail back questionnaires from BCF partial household (i.e., NOT marked as whole household)</td>
</tr>
<tr>
<td></td>
<td>13 = Paper enumerator questionnaires from List Enumerate</td>
</tr>
<tr>
<td></td>
<td>14 = Paper enumerator questionnaires from Update Enumerate</td>
</tr>
<tr>
<td></td>
<td>15 = Paper enumerator questionnaires from Update Enumerate ADD</td>
</tr>
<tr>
<td></td>
<td>16 = Paper enumerator questionnaires from Update Enumerate SUBSTITUTE</td>
</tr>
<tr>
<td></td>
<td>17 = Paper enumerator questionnaires from Nonresponse Followup (NRFU)</td>
</tr>
<tr>
<td></td>
<td>18 = Paper enumerator questionnaires from NRFU ADD</td>
</tr>
<tr>
<td></td>
<td>19 = Paper enumerator questionnaires from NRFU SUBSTITUTE</td>
</tr>
<tr>
<td></td>
<td>20 = Paper enumerator questionnaires from NRFU Whole Household Usual Home Elsewhere (WHUHE)</td>
</tr>
<tr>
<td></td>
<td>21 = Paper enumerator questionnaires from NRFU In-mover</td>
</tr>
<tr>
<td></td>
<td>22 = Paper enumerator questionnaires from Coverage Improvement Followup (CIFU)</td>
</tr>
<tr>
<td></td>
<td>23 = Paper enumerator questionnaires from CIFU ADD</td>
</tr>
<tr>
<td></td>
<td>24 = Paper enumerator questionnaires from CIFU SUBSTITUTE</td>
</tr>
<tr>
<td></td>
<td>25 = Paper enumerator questionnaires from T-Night</td>
</tr>
<tr>
<td></td>
<td>26 = Paper questionnaires for UHE from Service-based Enumeration (SBE) (Individual Census Questionnaire (ICQ))</td>
</tr>
<tr>
<td></td>
<td>27 = Paper questionnaires for UHE from Group Quarters (GQ) enumeration (Individual Census Questionnaire (ICQ))</td>
</tr>
<tr>
<td></td>
<td>28 = Paper questionnaires for UHE from Military GQ enumeration (Military Census Report (MCR))</td>
</tr>
<tr>
<td></td>
<td>29 = Paper questionnaires for UHE from Shipboard GQ enumeration (Shipboard Census Report (SCR))</td>
</tr>
</tbody>
</table>
30 = Electronic short form from IDC
31 = Electronic TQA reverse-CATI short form
32 = Electronic TQA reverse-CATI BCF for whole household
33 = Electronic TQA reverse-CATI BCF for partial household
34 = Electronic Coverage Edit Followup (CEFU) from long or short form
35 = Electronic CEFU from BCF for whole household
36 = Electronic CEFU from IDC
37 = Paper enumerator continuation form - unlinked "orphan"

**DC_DRF(12)** **Source of Data Capture**

0 = None
1 = Some Data Capture

The types of data capture for housing units are -

1. Mail Return *(RSOURCEx: 1, 4 - 10)*
2. Telephone Questionnaire Assistance (TQA) *(RSOURCEx: 31)*
3. Internet *(RSOURCEx: 30)*
4. Be Counted Form (BCF) *(RSOURCEx: 11, 12)*
5. CEFU Data Capture *(RSOURCEx: 34 - 36)*
6. NRFU Data Capture *(RSOURCEx: 17 - 21)*
7. CIFU Data Capture *(RSOURCEx: 22 - 24)*
8. TQA/BCF *(RSOURCEx: 3, 32, 33)*
9. List Enumerate/Update Enumerate *(RSOURCEx: 13 - 16)*
10. Group Quarters *(RSOURCEx: 25 - 29)*
11. Orphans *(RSOURCEx: 37)*
12. Other *(RSOURCEx: -1)*
### Appendix C: Nineteen Response Categories of Housing Units in the Response Rate Denominator

<table>
<thead>
<tr>
<th>Data Capture Flags (DC_DRF from DRF-2)</th>
<th>No Mail Check in (0000 or 2000)</th>
<th>Reverse Check in (0099)</th>
<th>Mail Returns Jan 1 - Apr 10 (0101 - 0410)</th>
<th>Late Mail Returns Apr 11 - Apr 18 (0411 - 0418)</th>
<th>Late Late Mail Returns Apr 19 - Dec 31 (0419 - 1231)</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Paper Mail Return or TQA or Internet or Be Counted or TQA/Be Counted</td>
<td>1,939</td>
<td>401,666</td>
<td>8,657</td>
<td>2,646</td>
<td>71,943,511</td>
<td>2,460,317</td>
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<tr>
<td></td>
<td>6A*</td>
<td>6B*</td>
<td>7A*</td>
<td>7B*</td>
<td>8</td>
<td>9</td>
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<tr>
<td>CEFU</td>
<td>13</td>
<td>2,592</td>
<td>579</td>
<td>753</td>
<td>1,129,142</td>
<td>63,877</td>
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<tr>
<td>Non-Mail Returns</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>NRFU or CIFU or No Data Capture or Other Data Capture</td>
<td>28,270,977</td>
<td>987,902</td>
<td>122,671</td>
<td>6,020</td>
<td>8,963,003</td>
<td>38,350,573</td>
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<tr>
<td>Total</td>
<td>28,677,187</td>
<td>1,000,537</td>
<td>73,195,324</td>
<td>2,530,214</td>
<td>12,258,486</td>
<td>117,661,748</td>
</tr>
</tbody>
</table>

* A - Neither NRFU nor CIFU data capture  
  B - Either NRFU or CIFU data capture
### Appendix D: Response Rate Numerators and Denominators

<table>
<thead>
<tr>
<th>State</th>
<th>Numerator-April 18, 2000</th>
<th>Numerator-December 31, 2000</th>
<th>Denominator</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Total</td>
<td>Short</td>
<td>Long</td>
</tr>
<tr>
<td>TOTAL</td>
<td>75,608,035</td>
<td>64,792,554</td>
<td>10,815,481</td>
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<tr>
<td>Mailout/</td>
<td>62,890,520</td>
<td>54,955,537</td>
<td>7,934,983</td>
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<tr>
<td>Mailback</td>
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<td></td>
<td></td>
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<tr>
<td>Type of</td>
<td>12,591,087</td>
<td>9,726,223</td>
<td>2,864,864</td>
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<td>Enumeration</td>
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<td>Update/Leave</td>
<td>126,428</td>
<td>110,794</td>
<td>15,634</td>
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<td>Urban Update/</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Leave</td>
<td></td>
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</tbody>
</table>

Source: DMAF and DRF-2

Note: National totals do not include Puerto Rico.
Appendix E: Four Figures Illustrating the Mail Response Rates as of April 18, 2000 and the Final Mail Response Rates as of December 31, 2000 by Day and Form Type and Daily Percentage Increase in Response Rates by Day and Form Type

Figure 1. Mail Response Rates by Date by Form Type

- U/L delivery begins
- Advance notice
- Questionnaire mailout
- Reminder starts
- Reminder ends
- U/L delivery ends
- Census Day
- Initial NRFU cut
- Late mail return NRFU cut

Response Rate

Date

- Response Rate
- Short Form Rate
- Long Form Rate

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Figure 3: Response Rates by Date by Form Type

- NRFU complete
- Final NRFU cut
- Census Day
- NRFU begins
- Questionnaire mailing

Response Rate

Date

- Short Form Rate
- Long Form Rate

Response Rate

- 80.0%
- 70.0%
- 60.0%
- 50.0%
- 40.0%
- 30.0%
- 20.0%
- 10.0%
- 0.0%

- 12/21/2000
- 12/7/2000
- 11/9/2000
- 10/26/2000
- 10/12/2000
- 9/20/2000
- 9/14/2000
- 8/31/2000
- 8/17/2000
- 8/3/2000
- 7/20/2000
- 7/6/2000
- 6/22/2000
- 5/8/2000
- 5/25/2000
- 5/11/2000
- 4/27/2000
- 4/13/2000
- 3/30/2000
- 3/16/2000
- 3/2/2000
Figure 4. Daily Percentage Increase in Response Rates by Form Type

- Questionnaire mailout
- NRFU begins
- NRFU complete
- Last form received

Responses:
- Census Day
- Late mail return
- NRFU out

Increase in Response Rate

Date

0.0%  1.0%  2.0%  3.0%  4.0%  5.0%  6.0%

Legend:
- Response Rate
- Short Form Rate
- Long Form Rate
### Appendix F: Mail Response Numerators and Rates by Day

<table>
<thead>
<tr>
<th>Day</th>
<th>Date</th>
<th>Daily Increase</th>
<th>Cumulative</th>
<th>Daily Increase</th>
<th>Cumulative</th>
<th>Key dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>Thursday</td>
<td>03/02/2000</td>
<td>-</td>
<td>0</td>
<td>0.0%</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>Friday</td>
<td>03/03/2000</td>
<td>1,397</td>
<td>1,397</td>
<td>0.0%</td>
<td>0.0%</td>
<td>U/L delivery begins</td>
</tr>
<tr>
<td>Saturday</td>
<td>03/04/2000</td>
<td>65</td>
<td>1,462</td>
<td>0.0%</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>Sunday</td>
<td>03/05/2000</td>
<td>52</td>
<td>1,514</td>
<td>0.0%</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>Monday</td>
<td>03/06/2000</td>
<td>149,634</td>
<td>151,148</td>
<td>0.1%</td>
<td>0.1%</td>
<td>Advance notice delivery begins</td>
</tr>
<tr>
<td>Tuesday</td>
<td>03/07/2000</td>
<td>62,469</td>
<td>213,617</td>
<td>0.1%</td>
<td>0.2%</td>
<td></td>
</tr>
<tr>
<td>Wednesday</td>
<td>03/08/2000</td>
<td>176,971</td>
<td>390,588</td>
<td>0.2%</td>
<td>0.3%</td>
<td>Advance notice delivery ends</td>
</tr>
<tr>
<td>Thursday</td>
<td>03/09/2000</td>
<td>235,918</td>
<td>626,506</td>
<td>0.2%</td>
<td>0.5%</td>
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<tr>
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<td>03/10/2000</td>
<td>422,723</td>
<td>1,049,229</td>
<td>0.4%</td>
<td>0.9%</td>
<td></td>
</tr>
<tr>
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<td>03/11/2000</td>
<td>180,427</td>
<td>1,229,656</td>
<td>0.2%</td>
<td>1.0%</td>
<td>Questionnaire mailout delivery begins</td>
</tr>
<tr>
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<td>03/12/2000</td>
<td>217,372</td>
<td>1,447,028</td>
<td>0.2%</td>
<td>1.2%</td>
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</tr>
<tr>
<td>Monday</td>
<td>03/13/2000</td>
<td>756,539</td>
<td>2,203,567</td>
<td>0.6%</td>
<td>1.9%</td>
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</tr>
<tr>
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<td>03/14/2000</td>
<td>550,444</td>
<td>2,754,011</td>
<td>0.5%</td>
<td>2.3%</td>
<td>Questionnaire mailout delivery ends</td>
</tr>
<tr>
<td>Wednesday</td>
<td>03/15/2000</td>
<td>2,915,464</td>
<td>5,669,475</td>
<td>2.5%</td>
<td>4.8%</td>
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</tr>
<tr>
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<td>03/16/2000</td>
<td>4,269,016</td>
<td>9,938,491</td>
<td>3.6%</td>
<td>8.4%</td>
<td></td>
</tr>
<tr>
<td>Friday</td>
<td>03/17/2000</td>
<td>4,851,766</td>
<td>14,790,257</td>
<td>4.1%</td>
<td>12.6%</td>
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</tr>
<tr>
<td>Saturday</td>
<td>03/18/2000</td>
<td>3,454,841</td>
<td>18,245,098</td>
<td>2.9%</td>
<td>15.5%</td>
<td></td>
</tr>
<tr>
<td>Sunday</td>
<td>03/19/2000</td>
<td>2,923,374</td>
<td>21,168,472</td>
<td>2.5%</td>
<td>18.0%</td>
<td>Reminder card delivery begins</td>
</tr>
<tr>
<td>Monday</td>
<td>03/20/2000</td>
<td>5,262,381</td>
<td>26,430,853</td>
<td>4.5%</td>
<td>22.5%</td>
<td></td>
</tr>
<tr>
<td>Tuesday</td>
<td>03/21/2000</td>
<td>5,326,760</td>
<td>31,757,613</td>
<td>4.5%</td>
<td>27.0%</td>
<td>Reminder card delivery ends</td>
</tr>
<tr>
<td>Wednesday</td>
<td>03/22/2000</td>
<td>5,791,069</td>
<td>37,548,682</td>
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<td>31.9%</td>
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<tr>
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<td>03/23/2000</td>
<td>5,250,239</td>
<td>42,798,921</td>
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<td>36.4%</td>
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<td>3,627,566</td>
<td>46,426,487</td>
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<td>39.5%</td>
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<td>03/25/2000</td>
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<td>48,847,043</td>
<td>2.1%</td>
<td>41.5%</td>
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<tr>
<td>Sunday</td>
<td>03/26/2000</td>
<td>2,511,970</td>
<td>51,359,013</td>
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<td>43.7%</td>
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</tr>
<tr>
<td>Monday</td>
<td>03/27/2000</td>
<td>2,993,679</td>
<td>54,352,692</td>
<td>2.5%</td>
<td>46.2%</td>
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</tr>
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</table>
## Appendix F: Mail Response Numerators and Rates by Day

<table>
<thead>
<tr>
<th>Day</th>
<th>Date</th>
<th>Daily Increase</th>
<th>Cumulative</th>
<th>Mail Response Rate</th>
<th>Daily Increase</th>
<th>Cumulative</th>
<th>Key dates</th>
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<td>3,141,074</td>
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<td>Wednesday</td>
<td>03/29/2000</td>
<td>1,939,206</td>
<td>59,432,972</td>
<td>1.6%</td>
<td>50.5%</td>
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<tr>
<td>Thursday</td>
<td>03/30/2000</td>
<td>1,829,908</td>
<td>61,262,880</td>
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<td>52.1%</td>
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<tr>
<td>Friday</td>
<td>03/31/2000</td>
<td>1,744,944</td>
<td>63,007,824</td>
<td>1.5%</td>
<td>53.6%</td>
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<td>04/01/2000</td>
<td>1,365,370</td>
<td>64,373,194</td>
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<td>54.7%</td>
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<td>Census Day</td>
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<td>943,350</td>
<td>65,316,544</td>
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<td>55.5%</td>
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<td>66,807,490</td>
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<td>56.8%</td>
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<td>1,320,770</td>
<td>68,128,260</td>
<td>1.1%</td>
<td>57.9%</td>
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<td>Wednesday</td>
<td>04/05/2000</td>
<td>1,034,302</td>
<td>69,162,562</td>
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<td>58.8%</td>
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<td>1,233,153</td>
<td>70,395,715</td>
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<td>59.8%</td>
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<td>71,195,790</td>
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</tr>
<tr>
<td>Sunday</td>
<td>04/09/2000</td>
<td>419,715</td>
<td>72,380,762</td>
<td>0.4%</td>
<td>61.5%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Monday</td>
<td>04/10/2000</td>
<td>691,891</td>
<td>73,072,653</td>
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<td>62.1%</td>
<td></td>
<td>Initial NRFU cut</td>
</tr>
<tr>
<td>Tuesday</td>
<td>04/11/2000</td>
<td>342,541</td>
<td>73,415,194</td>
<td>0.3%</td>
<td>62.4%</td>
<td></td>
<td></td>
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<tr>
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<td>04/12/2000</td>
<td>411,695</td>
<td>73,826,889</td>
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<td>04/13/2000</td>
<td>302,181</td>
<td>74,129,070</td>
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<td>63.0%</td>
<td></td>
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<td>04/14/2000</td>
<td>523,441</td>
<td>74,652,511</td>
<td>0.4%</td>
<td>63.4%</td>
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<td></td>
</tr>
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<td>04/15/2000</td>
<td>305,789</td>
<td>74,958,300</td>
<td>0.3%</td>
<td>63.7%</td>
<td></td>
<td></td>
</tr>
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<td>Sunday</td>
<td>04/16/2000</td>
<td>167,706</td>
<td>75,126,006</td>
<td>0.1%</td>
<td>63.8%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Monday</td>
<td>04/17/2000</td>
<td>352,030</td>
<td>75,478,036</td>
<td>0.3%</td>
<td>64.1%</td>
<td></td>
<td></td>
</tr>
<tr>
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<td>04/18/2000</td>
<td>129,999</td>
<td>75,608,035</td>
<td>0.1%</td>
<td>64.3%</td>
<td></td>
<td>Late mail return NRFU cut</td>
</tr>
<tr>
<td>Wednesday</td>
<td>04/19/2000</td>
<td>210,358</td>
<td>75,818,393</td>
<td>0.2%</td>
<td>64.4%</td>
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<td>04/20/2000</td>
<td>209,631</td>
<td>76,028,024</td>
<td>0.2%</td>
<td>64.6%</td>
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<td></td>
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<td>04/21/2000</td>
<td>215,905</td>
<td>76,243,929</td>
<td>0.2%</td>
<td>64.8%</td>
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<td>04/22/2000</td>
<td>68,345</td>
<td>76,312,274</td>
<td>0.1%</td>
<td>64.9%</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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### Appendix F: Mail Response Numerators and Rates by Day

<table>
<thead>
<tr>
<th>Day</th>
<th>Date</th>
<th>Daily Increase</th>
<th>Cumulative</th>
<th>Daily Increase</th>
<th>Cumulative</th>
<th>Key dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sunday</td>
<td>04/23/2000</td>
<td>81,653</td>
<td>76,393,927</td>
<td>0.1%</td>
<td>64.9%</td>
<td>NRFU begins</td>
</tr>
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<td>Monday</td>
<td>04/24/2000</td>
<td>175,577</td>
<td>76,569,504</td>
<td>0.1%</td>
<td>65.1%</td>
<td></td>
</tr>
<tr>
<td>Tuesday</td>
<td>04/25/2000</td>
<td>91,243</td>
<td>76,660,747</td>
<td>0.1%</td>
<td>65.2%</td>
<td></td>
</tr>
<tr>
<td>Wednesday</td>
<td>04/26/2000</td>
<td>207,548</td>
<td>76,868,295</td>
<td>0.2%</td>
<td>65.3%</td>
<td></td>
</tr>
<tr>
<td>Thursday</td>
<td>04/27/2000</td>
<td>108,341</td>
<td>76,976,636</td>
<td>0.1%</td>
<td>65.4%</td>
<td></td>
</tr>
<tr>
<td>Friday</td>
<td>04/28/2000</td>
<td>90,307</td>
<td>77,066,943</td>
<td>0.1%</td>
<td>65.5%</td>
<td></td>
</tr>
<tr>
<td>Saturday</td>
<td>04/29/2000</td>
<td>28,058</td>
<td>77,095,001</td>
<td>0.0%</td>
<td>65.5%</td>
<td></td>
</tr>
<tr>
<td>Sunday</td>
<td>04/30/2000</td>
<td>1,157</td>
<td>77,096,158</td>
<td>0.0%</td>
<td>65.5%</td>
<td></td>
</tr>
<tr>
<td>Monday</td>
<td>05/01/2000</td>
<td>139,211</td>
<td>77,235,369</td>
<td>0.1%</td>
<td>65.6%</td>
<td></td>
</tr>
<tr>
<td>Tuesday</td>
<td>05/02/2000</td>
<td>23,404</td>
<td>77,258,773</td>
<td>0.0%</td>
<td>65.7%</td>
<td></td>
</tr>
<tr>
<td>Wednesday</td>
<td>05/03/2000</td>
<td>76,067</td>
<td>77,334,840</td>
<td>0.1%</td>
<td>65.7%</td>
<td></td>
</tr>
<tr>
<td>Thursday</td>
<td>05/04/2000</td>
<td>92,806</td>
<td>77,427,646</td>
<td>0.1%</td>
<td>65.8%</td>
<td></td>
</tr>
<tr>
<td>Friday</td>
<td>05/05/2000</td>
<td>126,560</td>
<td>77,554,206</td>
<td>0.1%</td>
<td>65.9%</td>
<td></td>
</tr>
<tr>
<td>Saturday</td>
<td>05/06/2000</td>
<td>29,679</td>
<td>77,583,885</td>
<td>0.0%</td>
<td>65.9%</td>
<td></td>
</tr>
<tr>
<td>Sunday</td>
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## Appendix F: Mail Response Numerators and Rates by Day

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## Appendix F: Mail Response Numerators and Rates by Day

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### Appendix F: Mail Response Numerators and Rates by Day

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<th>Cumulative</th>
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<th>Cumulative</th>
<th>Key dates</th>
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<tbody>
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<tr>
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<tr>
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<tr>
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### Appendix F: Mail Response Numerators and Rates by Day

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<thead>
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<th>Mail Response Numerator</th>
<th>Mail Response Rate</th>
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</tr>
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</tr>
<tr>
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</tr>
<tr>
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</tr>
<tr>
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<td>09/07/2000</td>
<td>-</td>
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</tr>
<tr>
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<td>67.1%</td>
</tr>
<tr>
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<td>09/09/2000</td>
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<td>67.1%</td>
</tr>
<tr>
<td>Sunday</td>
<td>09/10/2000</td>
<td>-</td>
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<td>-</td>
<td>78,903,452</td>
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<td>67.1%</td>
</tr>
<tr>
<td>Tuesday</td>
<td>09/12/2000</td>
<td>-</td>
<td>78,903,452</td>
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<td>67.1%</td>
</tr>
<tr>
<td>Wednesday</td>
<td>09/13/2000</td>
<td>-</td>
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<td>67.1%</td>
</tr>
<tr>
<td>Thursday</td>
<td>09/14/2000</td>
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<tr>
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<td>67.1%</td>
</tr>
<tr>
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<td>09/17/2000</td>
<td>-</td>
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<td>67.1%</td>
</tr>
<tr>
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</tr>
<tr>
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<tr>
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<td>67.1%</td>
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</table>
### Appendix F: Mail Response Numerators and Rates by Day

<table>
<thead>
<tr>
<th>Day</th>
<th>Date</th>
<th>Daily Increase</th>
<th>Cumulative</th>
<th>Daily Increase</th>
<th>Cumulative</th>
<th>Key dates</th>
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<td>67.1%</td>
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<tr>
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<td>67.1%</td>
<td></td>
</tr>
<tr>
<td>Friday</td>
<td>09/29/2000</td>
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<td>67.1%</td>
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</tr>
<tr>
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</tr>
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</tr>
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<td>0.0%</td>
<td>67.1%</td>
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</tr>
<tr>
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<tr>
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<td>78,903,515</td>
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<td>67.1%</td>
<td></td>
</tr>
<tr>
<td>Sunday</td>
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<td>-</td>
<td>78,903,515</td>
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<td>67.1%</td>
<td></td>
</tr>
<tr>
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<td>78,903,515</td>
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<td>67.1%</td>
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</tr>
<tr>
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<td>-</td>
<td>78,903,515</td>
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<td>67.1%</td>
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</tr>
<tr>
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<td>78,903,515</td>
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<td>67.1%</td>
<td></td>
</tr>
<tr>
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<td>67.1%</td>
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</tr>
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<td>-</td>
<td>78,903,515</td>
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<td>67.1%</td>
<td></td>
</tr>
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<td>Saturday</td>
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</tr>
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<td>67.1% Last mail return with check-in date received</td>
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<td>79,311,175</td>
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<td>67.4%</td>
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</table>

Source: DMAF and DRF-2.

Note: Rates are based on a response rate denominator of 117,661,748 housing units.

Note: No forms with a valid check-in date were received after October 19, 2000. Mail returns from addresses which also were enumerated in NRFU or CIFU with no check-in date were assigned a date of December 31, 2000.

Note: Rates do not include Puerto Rico.
<table>
<thead>
<tr>
<th>Day</th>
<th>Date</th>
<th>Daily Increase</th>
<th>Cumulative</th>
<th>Increase</th>
<th>Cumulative</th>
<th>Key dates</th>
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<td>0.0%</td>
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<td>1,262,717</td>
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# Appendix G-1: Mail Response Numerators and Rates for Short Forms

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### Appendix G-1: Mail Response Numerators and Rates for Short Forms

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<th>Cumulative</th>
<th>Daily Increase</th>
<th>Cumulative</th>
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</table>

Key dates:
- 68.5%
### Appendix G-1: Mail Response Numerators and Rates for Short Forms

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<tr>
<th>Day</th>
<th>Date</th>
<th>Daily Increase</th>
<th>Cumulative</th>
<th>Daily Increase</th>
<th>Cumulative</th>
<th>Key dates</th>
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## Appendix G-1: Mail Response Numerators and Rates for Short Forms

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<tr>
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### Appendix G-1: Mail Response Numerators and Rates for Short Forms

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<th>Day</th>
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<th>Daily Increase</th>
<th>Cumulative</th>
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<tr>
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<tr>
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<td>10/15/2000</td>
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<tr>
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<tr>
<td>Thursday</td>
<td>10/19/2000</td>
<td>3</td>
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<td>Last mail return with check-in date received</td>
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<td>308,954</td>
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<td>69.1%</td>
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</tbody>
</table>

Source: DMAP and DRF-2.

Note: Short form return rates are based on a denominator of 97,578,971.

Note: No forms with a valid check-in date were received after October 19, 2000. Mail returns from addresses which also were enumerated in NRFU or CIFU with no check-in date were assigned a date of December 31, 2000.

Note: Rates do not include Puerto Rico.
### Appendix G-2: Mail Response Numerators and Rates for Long Forms

<table>
<thead>
<tr>
<th>Day</th>
<th>Date</th>
<th>Daily Increase</th>
<th>Cumulative</th>
<th>Daily Increase</th>
<th>Cumulative</th>
<th>Key dates</th>
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<td>0.0%</td>
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<td>03/03/2000</td>
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<td>5</td>
<td>0.0%</td>
<td>0.0%</td>
<td>U/L delivery begins</td>
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<td>0.0%</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
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<td>0.0%</td>
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<td>0.1%</td>
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<td>114,400</td>
<td>298,711</td>
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<td>1.5%</td>
<td>Questionnaire mailout delivery begins</td>
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</table>
### Appendix G-2: Mail Response Numerators and Rates for Long Forms

<table>
<thead>
<tr>
<th>Day</th>
<th>Date</th>
<th>Daily Increase</th>
<th>Cumulative Increase</th>
<th>Key dates</th>
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<tr>
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<tr>
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<tr>
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<tr>
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<td>11,084,298</td>
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<tr>
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<td>04/28/2000</td>
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### Appendix G-2: Mail Response Numerators and Rates for Long Forms

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### Appendix G-2: Mail Response Numerators and Rates for Long Forms

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# Appendix G-2: Mail Response Numerators and Rates for Long Forms

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# Appendix G-2: Mail Response Numerators and Rates for Long Forms

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### Appendix G-2: Mail Response Numerators and Rates for Long Forms

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<th>Daily Increase</th>
<th>Cumulative</th>
<th>Daily Increase</th>
<th>Cumulative</th>
<th>Key dates</th>
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<td>Last mail return with check-in date received</td>
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</tr>
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</table>

Source: DMAP and DRF-2.

Note: Long form return rates have a denominator of 20,082,777.

Note: No forms with a valid check-in date were received after October 19, 2000. Mail returns from addresses which also were enumerated in NRFU or CIFU with no check-in date were assigned a date of December 31, 2000.

Note: Rates do not include Puerto Rico.
Monday
July 22, 1991

Part III

Department of Commerce

Office of the Secretary

Adjustment of the 1990 Census for Overcounts and Undercounts of Population and Housing; Notice of Final Decision
DEPARTMENT OF COMMERCE
Office of the Secretary
[Docket No. 51282-1161]

Decision of the Secretary of Commerce on Whether a Statistical Adjustment of the 1990 Census of Population and Housing Should Be Made for Coverage Deficiencies Resulting in an Overcount or Undercount of the Population

AGENCY: U.S. Department of Commerce.

ACTION: Notice of final decision.

SUMMARY: This is a notice of the final decision of the Secretary of Commerce on the issue of adjusting the 1990 census to correct for overcounts or undercounts of the population in the 1990 Census. The purpose of this notice is to inform the public of the decision and to explain the basis for the decision.

DATES: The decision is effective on July 13, 1991.


SUPPLEMENTARY INFORMATION: The Secretary of Commerce is required, pursuant to 13 U.S.C. 143, to conduct a deennial census of the population of the United States. The population totals derived from the census provide the basis for the apportionment of seats in the Congress of the United States, House of Representatives, for state legislative redistricting, for determining district boundaries for county and city elections, and for the allocation of federal funds to state and local governments.

In 1987, the Secretary of Commerce decided not to plan for a statistical adjustment of the 1980 Census. As a result, a lawsuit was filed by the city of New York and other parties seeking to compel the Department to plan for such an adjustment. Pursuant to an agreement between the parties in City of New York v. Department of Commerce, et al., 88-Civ-3474 (E.D.N.Y.), the Department undertook a de novo review of the adjustment issue in order to make a decision no later than July 13, 1991, on whether to adjust the 1990 Census. The purpose of this notice is to inform the public about the Secretary's decision and the basis for the decision.

Final guidelines which aided the Secretary in his decision were published in the Federal Register on March 13, 1990 (FR vol. 55, no. 51, part III, pp. 8838-8989). They were intended to provide the framework for a balanced consideration by the Secretary of factors relevant to the decision.

The census adjustment decision process was divided into several distinct phases. The first phase was the actual enumeration of the population. The second phase was the conduct of a post-enumeration survey, based on a probability sample of housing units. This sample provided data for two purposes: estimation of the net overcount or undercount of basic enumeration subgroups using capture-recapture methodology, and application of factors for the adjustment of the enumerated counts. The third phase of the process was a determination of the adequacy of the post-enumeration survey as an evaluation and adjustment tool. The fourth and final phase of the process was the decision on the adjustment question by the Secretary based on the published guidelines.

In making the decision, the Secretary relied on the advice of senior officials in the Economics and Statistics Administration, which includes the Census Bureau, as well as other senior advisors. The Secretary also relied on the individual recommendations of the eight members of the Special Advisory Panel appointed to provide independent advice to the Secretary on the adjustment question. In addition, the Secretary considered the public comments submitted to the Department pursuant to a Federal Register notice dated May 24, 1991, seeking comments on the question of whether the 1990 Census should be adjusted. The Department received approximately 650 public comments. These comments, as well as the appendices referred to in the following explanation of the decision, are available for public inspection in the U.S. Department of Commerce Central Reference and Records Inspection Facility, room 3202 Herbert C. Hoover Building, 14th Street and Constitution Avenue, N.W., Washington, DC 20230.

Following is a detailed discussion of the adjustment decision and the basis for the decision. The discussion is in four sections: a summary statement, an analysis of the guidelines, an evaluation of the recommendations of the Special Advisory Panel, and a statement of the decisional census procedures.

Robert A. Mosbacher,
Secretary of Commerce.

SECTION 1-SUMMARY STATEMENT

Statement of Secretary Robert A. Mosbacher on Adjustment of the 1990 Census

Reaching a decision on the adjustment of the 1990 census has been among the most difficult decisions I have ever made. There are strong equity arguments both for and against adjustment. But most importantly, the census counts are the basis for the political representation of every American. In every state, county, city, and block across the country, if we change the counts by a computerized, statistical process, we abandon a two hundred year tradition of honest, accurate population counts that we actually count people. Before we take a step of that magnitude, we must be certain that it would make the census better and the census counts of the population more accurate. After a thorough review, I find the evidence in support of an adjustment to be inconclusive and unconvincing. Therefore, I have decided that the 1990 census counts should not be changed by a statistical adjustment.

The 1990 census is one of the two best censuses ever taken in this country. We located about 90 percent of all the people living in the United States as well as U.S. military personnel living overseas, which is an extraordinary feat given the size, diversity and mobility of our population. But I am sad to report that despite the most aggressive outreach program in our nation's history, census participation and coverage was lower than average among certain segments of our population. Based on our estimates, Blacks appear to have been undercounted in the 1990 census by 4.8%, Hispanics by 5.2%, Asian-Pacific Islanders by 5.1%, and American Indians by 5.6%, while non-Blacks appear to have been overcounted by 1.7%.

I am deeply troubled by this problem of differential under-participation and undercount of minorities, and I regret that an adjustment does not address this phenomenon without adversely affecting the integrity of the census. Ultimately, I had to make the decision which was fairest for all Americans.

The 1990 census is not the vehicle to address the equity concerns raised by the undercount. Nonetheless, I am today requesting that the Census Bureau, as appropriate, information gleaned from the Post-Enumeration Survey into its intercensal estimates of...
the population. We should also seek other avenues for the Bush Administration and Congress to work together and address the impact of the differential undercount of minorities on federal programs.

In reaching the decision not to adjust the census, I have benefited from frank and open discussions of the full range of issues with my staff, with senior professionals from the Economics and Statistics Administration and the Census Bureau, with my Inspector General, and with statisticians and other experts. Throughout these discussions, there was a wide range of professional opinion and honest disagreement. The Department has tried to make the process leading to this decision as open as possible. In that spirit, we will provide the full record of the basis for our decision as soon as it is available.

In reaching the decision, I looked to statistical science for the evidence on whether the adjusted estimates were more accurate than the census count. As I am not a statistician, I relied on the advice of the Director of the Census Bureau, the Associate Director for the Decennial Census and other career Bureau officials, and the Under Secretary for Economic Affairs and Administrator of the Economics and Statistics Administration. I was also fortunate to have the independent counsel of the eight members of my Special Advisory Panel. These eight experts and their dedicated staffs gave generously of their time and expertise, and I am grateful to them.

There was a diversity of opinion among my advisors. The Special Advisory Panel split evenly as to whether there was convincing evidence that the adjusted counts were more accurate. There was also disagreement among the professionals in the Commerce Department, which includes the Economics and Statistics Administration and the Census Bureau. This compounded the difficulty of the decision for me. Ultimately, I was compelled to conclude that we cannot proceed on unstable ground in such an important matter of public policy.

The experts have raised some fundamental questions about an adjustment. The Post-Enumeration Survey, which was designed to allow us to find people we had missed, also missed important segments of the population. The models used to infer populations across the nation depended heavily on assumptions, and the results changed in important ways when the assumptions changed. These problems don’t disqualify the adjustment automatically—they mean we won’t get a perfect count from an adjustment. The question is whether we will get better estimates of the population. But what does better mean?

First, we have to look at various levels of geography—whether the counts are better at national, state, local, and block levels. Second, we have to determine whether the actual count is better and whether the share of states and cities within the total population is better. The paradox is that in attempting to make the actual count more accurate by an adjustment, we might be making the shares less accurate. The shares are very important because they determine how many counties each state gets, how political representation is allocated within states, and how large a “slice of the pie” of federal funds goes to each city and state. Any upward adjustment of one share necessarily means a downward adjustment of another. Because there is a loser for every winner, we need solid ground to stand on in making any changes. I do not find solid enough ground to proceed with an adjustment.

To make comparisons between the accuracy of the census and the adjusted numbers, various types of statistical tests are used. There is general agreement that at the national level, the adjusted counts are better, though independent analysis shows that adjusted counts, too, suffer from serious flaws. Below the national level, however, the experts disagree with respect to the accuracy of the shares measured from an adjustment. The classical statistical tests of whether accuracy is improved by an adjustment at state and local levels show mixed results and depend critically on assessments of the amount of statistical variation in the survey. Some question the validity of these tests, and many believe more work is necessary before we are sure of the conclusions.

Based on the measurements so far completed, the Census Bureau estimated that the proportional share of about 29 states would be made more accurate and about 21 states would be made less accurate by adjustment. Looking at cities, the census appears more accurate in 11 of the 23 metropolitan areas with 500,000 or more persons Phoenix, Washington, D.C., Jacksonville, Chicago, Baltimore, New York City, Memphis, Dallas, El Paso, Houston and San Antonio. Many of these cities would appear to be less accurately treated under an adjustment. While these analyses indicate that more people live in jurisdictions where the adjusted counts appear more accurate, one third of the population lives in areas where the census appears more accurate. As the population units get smaller, including small and medium sized cities, the adjusted figures become increasingly unreliable. When the Census Bureau made allowances for plausible estimates of factors not yet measured, these comparisons shifted toward favoring the accuracy of the census enumeration.

Using this test, 38 or 39 states were estimated to be made less accurate if the adjustment were to be used. What all these tests show, and no one disputes, is that the adjusted figures for some localities will be an improvement and for others the census counts will be better. While we know that some will fare better and some will fare worse, we just don’t really know how much better or how much worse, if the scientists cannot agree on these issues, how can we expect the American public to accept this change?

The evidence also raises questions about the stability of adjustment procedures. To calculate a nationwide adjustment from the survey, a series of statistical models are used which depend on simplifying assumptions. Changes in these assumptions result in different population estimates. Consider the results of two possible adjustment methods that were released by the Census Bureau on June 15, 1981. The statistical differences are small, but the differences in results are significant. The apportionment of the House of Representatives under the selected scheme moved two seats relative to the apportionment implied by the census, whereas the modified method moved only one seat. One expert found that among five reasonable alternative methods of calculating adjustments, none of the resulting apportionments of the House were the same, and eleven different states either gained or lost seats in at least one of the five methods. I recognize that the formulas for apportioning the House are responsive to small changes and some sensitivity should be expected. What is unsettling, however, is that the choice of the adjustment method selected by Bureau officials can make a difference in the apportionment, and the political outcome of that choice can be known in advance. I am confident that political considerations played a role in the Census Bureau’s choice of an adjustment model for the 1990 census. I am deeply concerned, however, that adjustment would operate to political tempering with the census in the future. The outcome of the enumeration process cannot be directly affected in such a way.
My concerns about adjustment are compounded by the problems encountered. Adjustment might well be the redistricting process, which is contentious and litigious enough without an adjustment. An adjusted set of numbers will certainly disrupt the political process and may create paralysis in the states that are working on redistricting or have completed it. Some people claim that they will be denied their rightful political representation without an adjustment. Those claims assume that the distribution of the population has been improved by an adjustment. This conclusion is not warranted based on the evidence available.

I also have serious concerns about the effect an adjustment might have on future censuses. I am worried that an adjustment would remove the incentives of states and local leaders to encourage census participation in their communities. Because census counts are the basis for political representation and federal funding allocations, communities have a vital interest in achieving the highest possible participation rates. If civic leaders and local officials believe that an adjustment will really the failures in the census, they will be hard pressed to justify putting census outreach programs above the many other needs clamoring for their limited resources. Without the partnership of states and cities in creating public awareness and a sense of involvement in the census, the result is likely to be a further decline in participation.

In looking at the record of public comment on this issue, I am struck by the fact that many of the comments are under the mistaken impression that an adjustment will fix a particular problem they have identified—for example, specific housing units or group quarters that they believe were missed. It does not do so. It is not a recount. What an adjustment would do is add over 6 million unidentified people to the census by duplicating the records of people already counted in the census while subtracting over 900,000 people who were actually identified and counted. The decision about which places gain people and which lose people is based on statistical conclusions drawn from the sample survey. The additions and deletions in any particular community are often based largely on data gathered from communities in other states.

The procedures that would be used to adjust the census are at the forefront of statistical methodology. Such research deserves and requires careful professional scrutiny before it is used to affect the allocation of political representation. Since the results of the evaluation studies of the survey were made available, several mistakes have been found which alter the certainty of some of the conclusions drawn by my advisors. The analysis continues, and new findings are likely. I am concerned that if an adjustment were made, it would be made on the basis of research conclusions that may well be reversed in the next several months.

It is important that research on this problem continue. We will also continue to carefully consider the limitations of the census and the survey and release additional data so that independent experts can study it. We must also look forward to the next census. Planning for the year 2000 has begun. A public advisory committee on the next census has been established and by early fall, I will announce the membership of that committee. I have instructed the Census Bureau's Year 2000 task force to consider all options for the next census, including methods for achieving sound adjustment techniques.

I give my heartfelt thanks to the many people who have devoted so much time and energy to this enterprise. The staff at the Census Bureau have demonstrated their professionalism at every turn through the last two difficult years. They executed a fine census and an excellent survey and then conducted a challenging research program into a few short months. I am deeply grateful for their help. Let me reiterate my sincere thanks to the Special Advisory Panel for their substantial contribution. The staff at the Department, especially those in the Economics and Statistics Administration, also deserve praise.

With this difficult decision behind us, we will consult ourselves anew to finding sound, fair and acceptable ways to continue to improve the census process. We welcome the leadership of Congress and other public officials, community groups, and technical experts in maximizing the effectiveness and minimizing the difficulties of the year 2000 census.


SECTION 2—ANALYSIS OF THE GUIDELINES

Analysis of the Guidelines

Introduction

The 1990 census counts should not be changed by a statistical adjustment. This section explains my evaluation of the evidence relevant to each of the eight guidelines that I considered in reaching my decision. Each section begins with a statement of the guideline and a reiteration of the explanation of the guideline contained in the March 15, 1990, Federal Register. A discussion of the guideline follows. The final section states my conclusions.

Summaries of my conclusions on each of the eight guidelines are set forth below.

Guideline One

Guideline One requires that convincing evidence be offered that the adjusted estimates of the population are more accurate than the census at the national, state, and local levels. In the absence of such evidence, the census counts are concluded to be the most accurate.

At the national level, it is likely that the adjusted estimates reflect more accurately the total population and the racial and ethnic populations of the country. It appears equally clear, however, that the PES omitted large numbers of certain groups—notably black males. We have no information on the location of these persons. In addition, the PES and demographic analysis lead to sharply different conclusions about the accuracy of the census for several age groups at the national level. Although these are not definitive disqualifiers at the national level, they do raise some question as to whether the adjusted figures are more accurate than the census count even at the national level.

The Constitution requires a census every 10 years not just to count the total number of people in the United States but to locate them so that political representation can be allocated to the states and the people in them in proportion to those numbers. I conclude that the primary criterion for accuracy should be distributive accuracy—that is, getting the nearly correct proportions of people in different areas. Improved numeric accuracy, although in itself desirable, cannot compensate for treating states and individuals less fairly.

At the State and local level the correct statistical analysis for both distributive and numeric accuracy simply has not been completed. The total error model indicates that the adjusted figures tend to be too high but generally closer in numeric terms to the true population than the census counts which tend to be too low. However, there is sufficient uncertainty about the true variance of the adjusted figures that numeric accuracy has not been definitively
2020 Census Crosswalk from Life Cycle Cost Estimate to FY 2019 President’s Budget Request  
(dollars in thousands)

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\(^1\) The Life Cycle Cost Estimate assumes CEDCaP and CEDSCI are funded within the 2020 Census PPA. The FY 2019 Budget Request proposes to transfer the programs to EDCaDS PPA.
KeyCite Yellow Flag - Negative Treatment

Declined to Extend by Semple v. Williams, D.Colo., February 14, 2018
136 S.Ct. 1120
Supreme Court of the United States

Sue EVENWEL et al., Appellants
v.
Greg ABBOTT, Governor of Texas, et al.

No. 14–940.
| Argued Dec. 8, 2015.
| Decided April 4, 2016.

Synopsis

Background: Voters brought action against Texas Governor and Secretary of State, seeking permanent injunction barring use of existing state Senate map in favor of map equalizing voter population in each district. A three-judge panel of the United States District Court for the Western District of Texas, 2014 WL 5780507, granted state's motion to dismiss. Probable jurisdiction was noted.

[ Holding: ] The Supreme Court, Justice Ginsburg, held that state and local jurisdictions plainly could measure equalization by total population of state and local legislative districts.

Affirmed.

Justice Thomas concurred in judgment and filed opinion.

Justice Alito, with whom Justice Thomas joined in part, concurred in judgment and filed opinion.

West Headnotes (8)

[1] Constitutional Law
   ☞ Electoral Districts

[2] Constitutional Law
   ☞ Electoral Districts
   Constitutional Law
   ☞ Power and duty to redistrict and reapportion
   Under the one person, one vote principle of the Equal Protection Clause, states must design both congressional and state legislative districts with equal populations, and must regularly reapportion districts to prevent malapportionment. U.S.C.A. Const.Amend. 14.

[3] Constitutional Law
   ☞ Population deviation
   Under the one person, one vote principle of the Equal Protection Clause, states must draw congressional districts with populations as close to perfect equality as possible. U.S.C.A. Const.Amend. 14.

   ☞ Population deviation
   Under the one person, one vote principle of the Equal Protection Clause, when drawing state and local legislative districts, states may deviate somewhat from perfect population equality to accommodate traditional districting objectives, such as preserving the integrity of political subdivisions, maintaining communities of interest, and creating geographic compactness. U.S.C.A. Const.Amend. 14.

[5] Constitutional Law
   ☞ Population deviation
   “Maximum population deviation,” i.e., the sum of the percentage deviations from
perfect population equality of the most- and least-populated districts, of more than 10% represents presumptively impermissible apportionment under the one person, one vote principle of the Equal Protection Clause. U.S.C.A. Const. Amend. 14.

4 Cases that cite this headnote

[6] Constitutional Law
 Equality of representation; discrimination
Election Law
 Population as basis and deviation therefrom

Under one person, one vote principle of Equal Protection Clause, state and local jurisdictions plainly could measure equalization by total population of state and local legislative districts; at founding, basis of representation in House of Representatives was to include all inhabitants, to make equal representation for equal numbers of people, and this idea was reinforced during debates over what became Fourteenth Amendment and in Supreme Court cases holding that districting based on total population serves both states' interests in preventing vote dilution and states' interests in ensuring equality of representation, and adopting voter-eligible apportionment as constitutional command would upset well-functioning approach utilized by all 50 states and countless local jurisdictions for decades, even centuries. U.S.C.A. Const. Art. 1, § 2, cl. 3; U.S.C.A. Const. Amend. 14.

6 Cases that cite this headnote

[7] Constitutional Law
 Equality of Voting Power (One Person, One Vote)

By ensuring that each representative is subject to the requests and suggestions from the same number of constituents, total-population apportionment promotes equitable and effective representation, consistent with the one person, one vote principle of the Equal Protection Clause. U.S.C.A. Const. Amend. 14.

3 Cases that cite this headnote

[8] Constitutional Law
 Equality of representation; discrimination

Under the one person, one vote principle of the Equal Protection Clause, states have an interest in taking reasonable, nondiscriminatory steps to facilitate access for all its residents to their elected representatives. U.S.C.A. Const. Amend. 14.

Cases that cite this headnote

*1121 Syllabus*

Under the one-person, one-vote principle, jurisdictions must design legislative districts with equal populations. See Wesberry v. Sanders, 376 U.S. 1, 7–8, 84 S.Ct. 526, 11 L.Ed.2d 481, Reynolds v. Sims, 377 U.S. 533, 568, 84 S.Ct. 1362, 12 L.Ed.2d 506. In the context of state and local legislative districting, States may deviate somewhat from perfect population equality to accommodate traditional districting objectives. Where the maximum population deviation between the largest and smallest district is less than 10%, a state or local legislative map presumptively complies with the one-person, one-vote rule.

Texas, like all other States, uses total-population numbers from the decennial census when drawing legislative districts. After the 2010 census, Texas adopted a State Senate map that has a maximum total-population deviation of 8.04%, safely within the presumptively permissible 10% range. However, measured by a voter-population baseline—eligible voters or registered voters—the map's maximum population deviation exceeds 40%. Appellants, who live in Texas Senate districts with particularly large eligible- and registered-voter populations, filed suit against the Texas Governor and Secretary of State. Basing apportionment on total population, appellants contended, dilutes their votes in relation to voters in other Senate districts, in violation of the one-person, one-vote principle of the Equal Protection
Clause. Appellants sought an injunction barring use of the existing Senate map in favor of a map that would equalize the voter population in each district. A three-judge District Court dismissed the complaint for failure to state a claim on which relief could be granted.

Held: As constitutional history, precedent, and practice demonstrate, a State or locality may draw its legislative districts based on total population. Pp. 1126 – 1133.

(a) Constitutional history shows that, at the time of the founding, the Framers endorsed allocating House seats to States based on total population. Debating what would become the Fourteenth Amendment, Congress reconsidered the proper basis for apportioning House seats. Retaining the total-population rule, Congress rejected proposals to allocate House seats on the basis of voter population. See U.S. Const., Amdt. 14, § 2. The Framers recognized that use of a total-population baseline served the principle of representational equality. Appellants' voter-population rule is inconsistent with the "theory of the Constitution," Cong. Globe, 39th Cong., 1st Sess., 2766 – 2767, this Court recognized in Wesberry as underlying not just the method of allocating House seats to States but also the method of apportioning legislative seats within States. Pp. 1126 – 1131.

(b) This Court's past decisions reinforce the conclusion that States and localities may comply with the one-person, one-vote principle by designing districts with equal total populations. Appellants assert that language in this Court's precedent supports their view that States should equalize the voter-eligible population of districts. But for every sentence appellants quote, one could respond with a line casting the one-person, one-vote guarantee in terms of equality of representation. See, e.g., Reynolds, 377 U.S., at 560–561, 84 S.Ct. 1362. Moreover, from Reynolds on, the Court has consistently looked to total-population figures when evaluating whether districting maps violate the Equal Protection Clause by deviating impermissibly from perfect population equality. Pp. 1130 – 1132.

(c) Settled practice confirms what constitutional history and prior decisions strongly suggest. Adopting voter-eligible apportionment as constitutional command would upset a well-functioning approach to districting that all 50 States and countless local jurisdictions have long followed. As the Framers of the Constitution and the Fourteenth Amendment comprehended, representatives serve all residents, not just those eligible to vote. Nonvoters have an important stake in many policy debates and in receiving constituent services. By ensuring that each representative is subject to requests and suggestions from the same number of constituents, total-population apportionment promotes equitable and effective representation. Pp. 1132 – 1133.

(d) Because constitutional history, precedent, and practice reveal the infirmity of appellants' claim, this Court need not resolve whether, as Texas now argues, States may draw districts to equalize voter-eligible population rather than total population. Pp. 1132 – 1133.

Affirmed.

GINSBURG, J., delivered the opinion of the Court, in which ROBERTS, C.J., and KENNEDY, BREYER, SOTOMAYOR, and KAGAN, JJ., joined. THOMAS, J., filed an opinion concurring in the judgment. ALITO, J., filed an opinion concurring in the judgment, in which THOMAS, J., joined except as to Part III–B.

Attorneys and Law Firms

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Scott A. Keller, Solicitor General, for Appellees.

Ian H. Gershengorn for the United States, as amicus curiae, by special leave of the Court, supporting the Appellees.

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Opinion

Justice GINSBURG delivered the opinion of the Court.
Texas, like all other States, draws its legislative districts on the basis of total population. Plaintiffs-appellants are Texas voters; they challenge this uniform method of districting on the ground that it produces unequal districts when measured by voter-eligible population. Voter-eligible population, not total population, they urge, must be used to ensure that their votes will not be devalued in relation to citizens’ votes in other districts. We hold, based on constitutional history, this Court's decisions, and longstanding practice, that a State may draw its legislative districts based on total population.

I

A

This Court long resisted any role in overseeing the process by which States draw legislative districts. “The remedy for unfairness in districting,” the Court once held, “is to secure State legislatures that will apportion properly, or to invoke the ample powers of Congress.” Colegrove v. Green, 328 U.S. 549, 556, 66 S.Ct. 1198, 90 L.Ed. 1432 (1946). “Courts ought not to enter this political thicket,” as Justice Frankfurter put it. Ibid.

Judicial abstention left pervasive malapportionment unchecked. In the opening half of the 20th century, there was a massive population shift away from rural areas and toward suburban and urban communities. Nevertheless, many States ran elections into the early 1960's based on maps drawn to equalize each district's population as it was composed around 1900. Other States used maps allocating a certain number of legislators to each county regardless of its population. These schemes left many rural districts significantly underpopulated in comparison with urban and suburban districts. But rural legislators who benefited from malapportionment had scant incentive to adopt new maps that might put them out of office.

[1] The Court confronted this ingrained structural inequality in Baker v. Carr, 369 U.S. 186, 191–192, 82 S.Ct. 691, 7 L.Ed.2d 663 (1962). That case presented an equal protection challenge to a Tennessee state-legislative map that had not been redrawn since 1901. See also id., at 192, 82 S.Ct. 691 (observing that, in the meantime, there had been “substantial growth and redistribution” of the State's population). Rather than steering clear of the political thicket yet again, the Court held for the first time that malapportionment claims are justiciable. Id., at 237, 82 S.Ct. 691 (“We conclude that the complaint’s allegations of a denial of equal protection present a justiciable constitutional cause of action upon which appellants are entitled to a trial and a decision.”).

[2] Although the Court in Baker did not reach the merits of the equal protection claim, Baker’s justiciability ruling set the stage for what came to be known as the one-person, one-vote principle. Just two years after Baker, in Wesberry v. Sanders, 376 U.S. 1, 7–8, 84 S.Ct. 526, 11 L.Ed.2d 481 (1964), the Court invalidated Georgia's malapportioned congressional map, under which the population of one congressional district was “two to three times” larger than the population of the others. Relying on Article I, § 2, of the Constitution, the Court required that congressional districts be drawn with equal populations. Id., at 7, 18, 84 S.Ct. 526. Later that same Term, in Reynolds v. Sims, 377 U.S. 533, 568, 84 S.Ct. 1362, 12 L.Ed.2d 506 (1964), the Court upheld an equal protection challenge to Alabama's malapportioned state-legislative maps. “[T]he Equal Protection Clause,” the Court concluded, “requires that the seats *1124 in both houses of a bicameral state legislature must be apportioned on a population basis.” Ibid. Wesberry and Reynolds together instructed that jurisdictions must design both congressional and state-legislative districts with equal populations, and must regularly reapportion districts to prevent malapportionment. 1

[3] [4] [5] Over the ensuing decades, the Court has several times elaborated on the scope of the one-person, one-vote rule. States must draw congressional districts with populations as close to perfect equality as possible. See Kirkpatrick v. Preisler, 394 U.S. 526, 530–531, 89 S.Ct. 1225, 22 L.Ed.2d 519 (1969). But, when drawing state and local legislative districts, jurisdictions are permitted to deviate somewhat from perfect population equality to accommodate traditional districting objectives, among them, preserving the integrity of political subdivisions, maintaining communities of interest, and creating geographic compactness. See Brown v. Thomson, 462 U.S. 835, 842–843, 103 S.Ct. 2690, 77 L.Ed.2d 214 (1983). Where the maximum population deviation between the largest and smallest district is less than 10%, the Court has held, a state or local legislative map presumptively complies with the one-person, one-vote rule. Ibid. 2 Maximum deviations above 10% are presumptively impermissible. Ibid. See also Mahan v.
194 L.Ed.2d 291, 84 USLW 4175, 16 Cal. Daily Op. Serv. 3547...

Howell, 410 U.S. 315, 329, 93 S.Ct. 979, 35 L.Ed.2d 320 (1973) (approving a state-legislative map with maximum population deviation of 16% to accommodate the State's interest in “maintaining the integrity of political subdivision lines,” but cautioning that this deviation “may well approach tolerable limits”).

In contrast to repeated disputes over the permissibility of deviating from perfect population equality, little controversy has centered on the population base jurisdictions must equalize. On rare occasions, jurisdictions have relied on the registered-voter or voter-eligible populations of districts. See Burns v. Richardson, 384 U.S. 73, 93–94, 86 S.Ct. 1286, 16 L.Ed.2d 376 (1966) (holding Hawaii could use a registered-voter population base because of “Hawaii's special population problems”—in particular, its substantial temporary military population). But, in the overwhelming majority of cases, jurisdictions have equalized total population, as measured by the decennial census. Today, all States use total-population numbers from the census when designing congressional and state-legislative districts, and only seven States adjust those census numbers in any meaningful way. 3

*1125 B

Appellants challenge that consensus. After the 2010 census, Texas redrew its State Senate districts using a total-population baseline. At the time, Texas was subject to the preclearance requirements of § 5 of the Voting Rights Act of 1965. 52 U.S.C. § 10304 (requiring jurisdictions to receive approval from the U.S. Department of Justice or the U.S. District Court for the District of Columbia before implementing certain voting changes). Once it became clear that the new Senate map, S148, would not receive preclearance in advance of the 2012 elections, the U.S. District Court for the Western District of Texas drew an interim Senate map, S164, which also equalized the total population of each district. See Davis v. Perry, No. SA–11–CV–788, 2011 WL 6207134 (Nov. 23, 2011). 4 On direct appeal, this Court observed that the District Court had failed to “take guidance from the State's recently enacted plan in drafting an interim plan,” and therefore vacated the District Court's map. Perry v. Perez, 565 U.S. ——, ——, —— – ——, 132 S.Ct. 934, 940–942, 943–944, 181 L.Ed.2d 900 (2012) (per curiam ).

The District Court, on remand, again used census data to draw districts so that each included roughly the same size total population. Texas used this new interim map, S172, in the 2012 elections, and, in 2013, the Texas Legislature adopted S172 as the permanent Senate map. See App. to Brief for Texas Senate Hispanic Caucus et al. as Amici Curiae 5 (reproducing the current Senate map). The permanent map's maximum total-population deviation is 8.04%, safely within the presumptively permissible 10% range. But measured by a voter-population baseline—eligible voters or registered voters—the map's maximum population deviation exceeds 40%.

Appellants Sue Evenwel and Edward Pfenninger live in Texas Senate districts (one and four, respectively) with particularly large eligible- and registered-voter populations. Contending that basing apportionment on total population dilutes their votes in relation to voters in other Senate districts, in violation of the one-person, one-vote principle of the Equal Protection Clause, 5 appellants filed suit in the U.S. District Court for the Western District of Texas. They named as defendants the Governor and Secretary of State of Texas, and sought a permanent injunction barring use of the existing Senate map in favor of a map that would equalize the voter population in each district.

The case was referred to a three-judge District Court for hearing and decision. See 28 U.S.C. § 2284(a); Shapiro v. McManus. *1126 577 U.S. ——, —— – ——, 136 S.Ct. 450, 454–456, 193 L.Ed.2d 279 (2015). That court dismissed the complaint for failure to state a claim on which relief could be granted. Appellants, the District Court explained, “rely[ed] upon a theory never before accepted by the Supreme Court or any circuit court: that the metric of apportionment employed by Texas (total population) results in an unconstitutional apportionment because it does not achieve equality as measured by Plaintiffs’ chosen metric—voter population.” App. to Juris. Statement 9a. Decisions of this Court, the District Court concluded, permit jurisdictions to use any neutral, nondiscriminatory population baseline, including total population, when drawing state and local legislative districts. Id., at 13a–14a. 6

We noted probable jurisdiction, 575 U.S. ——, 136 S.Ct. 581, 193 L.Ed.2d 288 (2015), and now affirm.
II

[6] The parties and the United States advance different positions in this case. As they did before the District Court, appellants insist that the Equal Protection Clause requires jurisdictions to draw state and local legislative districts with equal voter-eligible populations, thus protecting “voter equality,” i.e., “the right of eligible voters to an equal vote.” Brief for Appellants 14. To comply with their proposed rule, appellants suggest, jurisdictions should design districts based on citizen-voting-age-population (CVAP) data from the Census Bureau’s American Community Survey (ACS), an annual statistical sample of the U.S. population. Texas responds that jurisdictions may, consistent with the Equal Protection Clause, design districts using any population baseline—including total population and voter-eligible population—so long as the choice is rational and not invidiously discriminatory. Although its use of total-population data from the census was permissible, Texas therefore argues, it could have used ACS CVAP data instead. Sharing Texas’ position that the Equal Protection Clause does not mandate use of voter-eligible population, the United States urges us not to address Texas’ separate assertion that the Constitution allows States to use alternative population baselines, including voter-eligible population. Equalizing total population, the United States maintains, vindicates the principle of representational equality by “ensur[ing] that the voters in each district have the power to elect a representative who represents the same number of constituents as all other representatives.” Brief for United States as Amicus Curiae 5.

In agreement with Texas and the United States, we reject appellants’ attempt to locate a voter-equality mandate in the Equal Protection Clause. As history, precedent, and practice demonstrate, it is plainly permissible for jurisdictions to *1127 measure equalization by the total population of state and local legislative districts.

A

We begin with constitutional history. At the time of the founding, the Framers confronted a question analogous to the one at issue here: On what basis should congressional districts be allocated to States? The Framers’ solution, now known as the Great Compromise, was to provide each State the same number of seats in the Senate, and to allocate House seats based on States’ total populations. “Representatives and direct Taxes,” they wrote, “shall be apportioned among the several States which may be included within this Union, according to their respective Numbers.” U.S. Const., Art. I, § 2, cl. 3 (emphasis added). “It is a fundamental principle of the proposed constitution,” James Madison explained in the Federalist Papers, “that as the aggregate number of representatives allotted to the several states, is to be ... founded on the aggregate number of inhabitants; so, the right of choosing this allotted number in each state, is to be exercised by such part of the inhabitants, as the state itself may designate.” The Federalist No. 54, p. 284 (G. Carey & J. McClellan eds. 2001). In other words, the basis of representation in the House was to include all inhabitants—although slaves were counted as only three-fifths of a person—even though States remained free to deny many of those inhabitants the right to participate in the selection of their representatives. 8 Endorsing apportionment based on total population, Alexander Hamilton declared: “There can be no truer principle than this—that every individual of the community at large has an equal right to the protection of government.” 1 Records of the Federal Convention of 1787, p. 473 (M. Farrand ed. 1911). 9

When debating what is now the Fourteenth Amendment, Congress reconsidered the proper basis for apportioning House seats. Concerned that Southern States would not willingly enfranchise freed slaves, and aware that “a slave's freedom could swell his state's population for purposes of representation in the House by one person, rather than only three-fifths,” the Framers of the Fourteenth Amendment considered at length the possibility of allocating House seats to States on the basis of voter population. J. *1128 Sneed, Footprints on the Rocks of the Mountain: An Account of the Enactment of the Fourteenth Amendment 28 (1997). See also id., at 35 (“[T]he apportionment issue consumed more time in the Fourteenth Amendment debates than did any other topic.”).

In December 1865, Thaddeus Stevens, a leader of the Radical Republicans, introduced a constitutional amendment that would have allocated House seats to States “according to their respective legal voters”; in addition, the proposed amendment mandated that “[a] true census of the legal voters shall be taken at the
same time with the regular census.” Cong. Globe, 39th Cong., 1st Sess., 10 (1866). Supporters of apportionment based on voter population employed the same voter-equality reasoning that appellants now echo. See, e.g., id., at 380 (remarks of Rep. Orth) (“[T]he true principle of representation in Congress is that voters alone should form the basis, and that each voter should have equal political weight in our Government....”); id., at 404 (remarks of Rep. Lawrence) (use of total population “disregards the fundamental idea of all just representation, that every voter should be equal in political power all over the Union”).

Voter-based apportionment proponents encountered fierce resistance from proponents of total-population apportionment. Much of the opposition was grounded in the principle of representational equality. “As an abstract proposition,” argued Representative James G. Blaine, a leading critic of allocating House seats based on voter population, “no one will deny that population is the true basis of representation; for women, children, and other non-voting classes may have as vital an interest in the basis of representation; for women, children, and other population, “no one will deny that population is the true leading critic of allocating House seats based on voter proposition,” argued Representative James G. Blaine, a leading critic of allocating House seats based on voter population, “no one will deny that population is the true basis of representation; for women, children, and other non-voting classes may have as vital an interest in the legislation of the country as those who actually deposit the ballot.” Id., at 141. See also id., at 358 (remarks of Rep. Conkling) (arguing that use of a voter-population basis “would shut out four fifths of the citizens of the country —women and children, who are citizens, who are taxed, and who are, and always have, been, represented”); id., at 434 (remarks of Rep. Ward) (“[W]hat becomes of that large class of non-voting tax-payers that are found in every section? Are they in no matter to be represented? They certainly should be enumerated in making up the whole number of those entitled to a representative.”).

The product of these debates was § 2 of the Fourteenth Amendment, which retained total population as the congressional apportionment base. See U.S. Const., Amdt. 14, § 2 (“Representatives shall be apportioned among the several States according to their respective numbers, counting the whole number of persons in each State, excluding Indians not taxed.”). Introducing the final version of the Amendment on the Senate floor, Senator Jacob Howard explained:

“[T]he basis of representation is numbers ...; that is, the whole population except untaxed Indians and persons excluded by the State laws for rebellion or other crime.... The committee adopted numbers as the most just and satisfactory basis, and this is the principle upon which the Constitution itself was originally framed, that the basis of representation should depend upon numbers; and such, I think, after all, is the safest and most secure principle upon which the Government can rest. Numbers, not voters; numbers, not property; this is the theory of the Constitution.” Cong. Globe, 39th Cong., 1st Sess., 2766–2767 (1866).

Appellants ask us to find in the Fourteenth Amendment’s Equal Protection Clause a rule inconsistent with this “theory of the Constitution.” But, as the Court recognized in Wesberry, this theory underlies *1129 not just the method of allocating House seats to States; it applies as well to the method of apportioning legislative seats within States. “The debates at the [Constitutional] Convention,” the Court explained, “make at least one fact abundantly clear: that when the delegates agreed that the House should represent ‘people,’ they intended that in allocating Congressmen the number assigned to each state should be determined solely by the number of inhabitants.” 376 U.S., at 13, 84 S.Ct. 526. “While it may not be possible to draw congressional districts with mathematical precision,” the Court acknowledged, “that is no excuse for ignoring our Constitution’s plain objective of making equal representation for equal numbers of people the fundamental goal for the House of Representatives.” Id., at 18, 84 S.Ct. 526 (emphasis added). It cannot be that the Fourteenth Amendment calls for the apportionment of congressional districts based on total population, but simultaneously prohibits States from apportioning their own legislative districts on the same basis.

Cordoning off the constitutional history of congressional districting, appellants stress two points. 10 First, they draw a distinction between allocating seats to States, and apportioning seats within States. The Framers selected total population for the former, appellants and their amici argue, because of federalism concerns inapposite to intrastate districting. These concerns included the perceived risk that a voter-population base might encourage States to expand the franchise unwisely, and the hope that a total-population base might counter States’ incentive to undercount their populations, thereby reducing their share of direct taxes. Wesberry, however, rejected the distinction appellants now press. See supra, at 1128 – 1129. Even without the weight of Wesberry, we would find appellants’ distinction unconvincing. One can accept that federalism—or, as Justice ALITO emphasizes, partisan and regional political advantage, see post, at 1145 – 1149—figured in the Framers’ selection of total
population as the basis for allocating congressional seats. Even so, it remains beyond doubt that the principle of representational equality figured prominently in the decision to count people, whether or not they qualify as voters.\footnote{11}

Second, appellants and Justice ALITO urge, see post, at 1144 – 1145, the Court has typically refused to analogize to features of the federal electoral system—here, the constitutional scheme governing congressional apportionment—when considering challenges to state and local election laws. True, in \textit{Reynolds}, the Court rejected Alabama's argument that it had permissibly modeled its State Senate apportionment scheme—one Senator for each county—on the United States Senate. “[T]he federal analogy,” the Court explained, “[i]s inapposite and irrelevant to state legislative districting schemes” because “[t]he system of representation in the two Houses of the Federal Congress” arose “from unique historical circumstances.” 377 U.S., at 573–574, 84 S.Ct. 1362.

Likewise, in \textit{Gray v. Sanders}, 372 U.S. 368, 371–372, 378, 83 S.Ct. 801, 9 L.Ed.2d 821 (1963), Georgia unsuccessfully attempted to defend, by analogy to the electoral college, its scheme of assigning a certain number of “units” to the winner of each county in statewide elections.

\textit{Reynolds} and \textit{Gray}, however, involved features of the federal electoral system that contravene the principles of both voter \textit{and} representational equality to favor interests that have no relevance outside the federal context. Senate seats were allocated to States on an equal basis to respect state sovereignty and increase the odds that the smaller States would ratify the Constitution. See \textit{Wesberry}, 376 U.S., at 9–13, 84 S.Ct. 526 (describing the history of the Great Compromise). See also \textit{Reynolds}, 377 U.S., at 575, 84 S.Ct. 1362 (“Political subdivisions of States—counties, cities, or whatever—never were and never have been considered as sovereign entities... The relationship of the States to the Federal Government could hardly be less analogous.”). “The [Electional] College was created to permit the most knowledgeable members of the community to choose the executive of a nation whose continental dimensions were thought to preclude an informed choice by the citizenry at large.” \textit{Williams v. Rhodes}, 393 U.S. 23, 43–44, 89 S.Ct. 5, 21 L.Ed.2d 24 (1968) (Harlan, J., concurring in result). See also \textit{Gray}, 372 U.S., at 378, 83 S.Ct. 801 (“The inclusion of the electoral college in the Constitution, as the result of specific historical concerns, validated the collegiate principle despite its inherent numerical inequality.” (footnote omitted)). By contrast, as earlier developed, the constitutional scheme for congressional apportionment rests in part on the same representational concerns that exist regarding state and local legislative districting. The Framers' answer to the apportionment question in the congressional context therefore undermines appellants' contention that districts must be based on voter population.

\section*{B}

Consistent with constitutional history, this Court's past decisions reinforce the conclusion that States and localities may comply with the one-person, one-vote principle by designing districts with equal total populations. Quoting language from those decisions that, in appellants' view, supports the principle of equal voting power—and emphasizing the phrase “one-person, one-vote”—appellants contend that the Court had in mind, and constantly meant, that States should equalize the voter-eligible population of districts. See \textit{Reynolds}, 377 U.S., at 568, 84 S.Ct. 1362 (“[A]n individual's right to vote for State legislators is unconstitutionally impaired when its weight is in a substantial fashion diluted when compared with votes of citizens living on other parts of the State.”); \textit{Gray}, 372 U.S., at 379–380, 83 S.Ct. 801 (“The concept of 'we the people' under the Constitution visualizes no preferred class of voters but equality among those who meet the basic qualifications.”). See also *\footnote{1131} \textit{Hadley v. Junior College Dist. of Metropolitan Kansas City}, 397 U.S. 50, 56, 90 S.Ct. 791, 25 L.Ed.2d 45 (1970) (“[W]hen members of an elected body are chosen from separate districts, each district must be established on a basis that will insure, as far as is practicable, that equal numbers of voters can vote for proportionally equal numbers of officials.”). Appellants, however, extract far too much from selectively chosen language and the “one-person, one-vote” slogan.

For every sentence appellants quote from the Court's opinions, one could respond with a line casting the one-person, one-vote guarantee in terms of equality of representation, not voter equality. In \textit{Reynolds}, for instance, the Court described “the fundamental principle of representative government in this country” as “one of equal representation for equal numbers of people.” 377 U.S., at 560–561, 84 S.Ct. 1362. See also \textit{Davis v.
Moreover, from *Reynolds* on, the Court has consistently looked to total-population figures when evaluating whether districting maps violate the Equal Protection Clause by deviating impermissibly from perfect population equality. See Brief for Appellees 29-31 (collecting cases brought under the Equal Protection Clause). See also *id.*, at 31, n. 9 (collecting congressional-districting cases). Appellants point to no instance in which the Court has determined the permissibility of deviation based on eligible- or registered-voter data. It would hardly make sense for the Court to have mandated voter equality *sub silentio* and then used a total-population baseline to evaluate compliance with that rule. More likely, we think, the Court has always assumed the permissibility of drawing districts to equalize total population.

“In the 1960s,” appellants counter, “the distribution of the voting population generally did not deviate from the distribution of total population to the degree necessary to raise this issue.” Brief for Appellants 27. To support this assertion, appellants cite only a District Court decision, which found no significant deviation in the distribution of voter and total population in “densely populated areas of New York State.” *WMCA, Inc. v. Lomenzo*, 238 F.Supp. 916, 925 (S.D.N.Y.), aff'd, 382 U.S. 4, 86 S.Ct. 24, 15 L.Ed.2d 2 (1965) (*per curiam*). Had this Court assumed such equivalence on a national scale, it likely would have said as much. Instead, in *Gaffney v. Cummings*, 412 U.S. 735, 746-747, 93 S.Ct. 2321, 37 L.Ed.2d 298 (1973), the Court acknowledged that voters may be distributed unevenly within jurisdictions. “If it is the weight of a person's vote that matters,” the Court observed, then “total population—even if stable and accurately taken—may not actually reflect that body of voters whose votes must be counted and weighed for the purposes of reapportionment, because 'census persons' are not voters.” *id.*, at 746, 93 S.Ct. 2321. Nonetheless, the Court in *Gaffney* recognized that the one-person, one-vote rule is designed to facilitate “fair and effective representation,” *id.*, at 748, 93 S.Ct. 2321, and evaluated compliance with the rule based on total population alone, *id.*, at 750, 93 S.Ct. 2321.

C

[7] [8] What constitutional history and our prior decisions strongly suggest, settled practice confirms. Adopting voter-eligible apportionment as constitutional command would upset a well-functioning approach to districting that all 50 States and countless local jurisdictions have followed for decades, even centuries. Appellants have shown no reason for the Court to disturb this longstanding use of total population. See *Walz v. Tax Comm'n of City of New York*, 397 U.S. 664, 678, 90 S.Ct. 1409, 25 L.Ed.2d 697 (1970) (“unbroken practice” followed “openly and by affirmative state action, not covertly or by state inaction, is not something to be lightly cast aside”). See also *Burson v. Freeman*, 504 U.S. 191, 203-206, 112 S.Ct. 1846, 119 L.Ed.2d 5 (1992) (plurality opinion) (upholding a law limiting campaigning in areas around polling places in part because all 50 States maintain such laws, so there is a “widespread and time-tested consensus” that legislation of this order serves important state interests). As the Framers of the Constitution and the Fourteenth Amendment comprehended, representatives serve all residents, not just those eligible or registered to vote. See supra, at 1126 – 1129. Nonvoters have an important stake in many policy debates—children, their parents, even their grandparents, for example, have a stake in a strong public-education system—and in receiving constituent services, such as help navigating public-benefits bureaucracies. By ensuring that each representative is subject to requests
and suggestions from the same number of constituents, total-population apportionment promotes equitable and effective representation. See *McCormick v. United States*, 500 U.S. 257, 111 S.Ct. 1807, 114 L.Ed.2d 307 (1991) (“Serving constituents and supporting legislation that will benefit the district and individuals and groups therein is the everyday business of a legislator.”).  

In sum, the rule appellants urge has no mooring in the Equal Protection Clause. The Texas Senate map, we therefore conclude, complies with the requirements of the one-person, one-vote principle. Because history, precedent, and practice suffice to reveal the infirmity of appellants' claims, we need not and do not resolve whether, as Texas now argues, States may draw districts to equalize voter-eligible population rather than total population.

For the reasons stated, the judgment of the United States District Court for the Western District of Texas is

Affirmed.

Justice THOMAS, concurring in the judgment.

This case concerns whether Texas violated the Equal Protection Clause—as interpreted by the Court's one-person, one-vote cases—by creating legislative districts that contain approximately equal total population but vary widely in the number of eligible voters in each district. I agree with the majority that our precedents do not require a State to equalize the total number of voters in each district. States may opt to equalize voter-eligible population rather than total population.

I write separately because this Court has never provided a sound basis for the one-person, one-vote principle. For 50 years, the Court has struggled to define what right that principle protects. Many of our precedents suggest that it protects the right of eligible voters to cast votes that receive equal weight. Despite that frequent explanation, our precedents often conclude that the Equal Protection Clause is satisfied when all individuals within a district—voters or not—have an equal share of representation. The majority today concedes that our cases have not produced a clear answer on this point. See *ante*, at 1131.

In my view, the majority has failed to provide a sound basis for the one-person, one-vote principle because no such basis exists. The Constitution does not prescribe any one basis for apportionment within States. It instead leaves States significant leeway in apportioning their own districts to equalize total population, to equalize eligible voters, or to promote any other principle consistent with a republican form of government. The majority should recognize the futility of choosing only one of these options. The Constitution leaves the choice to the people alone—not to this Court.

I

In the 1960's, this Court decided that the Equal Protection Clause requires States to draw legislative districts based on a “one-person, one-vote” rule. But this Court's decisions have never coalesced around a single theory about what States must equalize.

*1134 The Equal Protection Clause prohibits a State from “deny[ing] to any person within its jurisdiction the equal protection of the laws.” Amdt. 14, § 1. For nearly a century after its ratification, this Court interpreted the Clause as having no application to the politically charged issue of how States should apportion their populations in political districts. See, e.g., *Colegrove v. Green*, 328 U.S. 549, 556, 66 S.Ct. 1198, 90 L.Ed. 1432 (1946) (plurality opinion). Instead, the Court left the drawing of States' political boundaries to the States, so long as a State did not deprive people of the right to vote for reasons prohibited by the Constitution. See *id.*, at 552, 556, 66 S.Ct. 1198; *Gomillion v. Lightfoot*, 364 U.S. 339, 341, 347–348, 81 S.Ct. 125, 5 L.Ed.2d 110 (1960) (finding justiciable a claim that a city boundary was redrawn from a square shape to “a strangely irregular twenty-eight-sided figure” to remove nearly all black voters from the city). This meant that a State's refusal to allocate voters within districts based on population changes was a matter for States—not federal courts—to decide. And these cases were part of a larger jurisprudence holding that the question whether a state government had a “proper” republican form rested with Congress. *Pacific States Telephone & Telegraph Co. v. Oregon*, 223 U.S. 118, 149–150, 32 S.Ct. 224, 56 L.Ed. 377 (1912).

This Court changed course in *Baker v. Carr*, 369 U.S. 186, 82 S.Ct. 691, 7 L.Ed.2d 663 (1962), by locating in
the Equal Protection Clause a right of citizens not to have a “‘debasement of their votes.’ ” *Id., at 194, and n. 15, 200, 82 S.Ct. 691. Expanding on that decision, this Court later held that “the Equal Protection Clause requires that the seats in both houses of a bicameral state legislature must be apportioned on a population basis.” *Reynolds v. Sims, 377 U.S. 533, 568, 84 S.Ct. 1362, 12 L.Ed.2d 506 (1964). The Court created an analogous requirement for congressional redistricting rooted in Article I, § 2’s requirement that “Representatives be chosen ‘by the People of the several States.’ ” *Wesberry v. Sanders, 376 U.S. 1, 7–9, 84 S.Ct. 526, 11 L.Ed.2d 481 (1964). The rules established by these cases have come to be known as “one person, one vote.”

Since *Baker* empowered the federal courts to resolve redistricting disputes, this Court has struggled to explain whether the one-person, one-vote principle ensures equality among eligible voters or instead protects some broader right of every citizen to equal representation. The Court’s lack of clarity on this point, in turn, has left unclear whether States must equalize the number of eligible voters across districts or only total population.

In a number of cases, this Court has said that States must protect the right of eligible voters to have their votes receive equal weight. On this view, there is only one way for States to comply with the one-person, one-vote principle: they must draw districts that contain a substantially equal number of eligible voters per district.

The Court’s seminal decision in *Baker* exemplifies this view. Decided in 1962, *Baker* involved the failure of the Tennessee Legislature to reapportion its districts for 60 years. 369 U.S., at 191, 82 S.Ct. 691. Since Tennessee’s last apportionment, the State’s population had grown by about 1.5 million residents, from about 2 to more than 3.5 million. And the number of voters in each district had changed significantly over time, producing widely varying voting populations in each district. *Id., at 192, 82 S.Ct. 691. Under these facts, the Court held that reapportionment claims were justiciable because the plaintiffs—who all claimed to be eligible voters—had alleged a “debasement of their votes.” *1135 Id., at 194, and n. 15, 204, 82 S.Ct. 691 (internal quotation marks omitted).

The Court similarly emphasized equal treatment of eligible voters in *Gray v. Sanders*, 372 U.S. 368, 83 S.Ct. 801, 9 L.Ed.2d 821 (1963). That case involved a challenge to Georgia’s “county unit” system of voting. *Id., at 370, 83 S.Ct. 801. This system, used by the State’s Democratic Party to nominate candidates in its primary, gave each county two votes for every representative that the county had in the lower House of its General Assembly. Voting was then done by county, with the winner in each county taking all of that county’s votes. The Democratic Party nominee was the candidate who had won the most county-unit votes, not the person who had won the most individual votes. *Id., at 370–371, 83 S.Ct. 801. The effect of this system was to give heavier weight to rural ballots than to urban ones. The Court held that the system violated the one-person, one-vote principle. *Id., at 379–381, and n. 12, 83 S.Ct. 801. In so holding, the Court emphasized that the right at issue belongs to “all qualified voters” and is the right to have one’s vote “counted once” and protected against dilution. *Id., at 380, 83 S.Ct. 801.

In applying the one-person, one-vote principle to state legislative districts, the Court has also emphasized vote dilution, which also supports the notion that the one-person, one-vote principle ensures equality among eligible voters. It did so most notably in *Reynolds*. In that case, Alabama had failed to reapportion its state legislature for decades, resulting in population-variance ratios of up to about 41 to 1 in the State Senate and up to about 16 to 1 in the House. 377 U.S., at 545, 84 S.Ct. 1362. In explaining why Alabama’s failure to reapportion violated the Equal Protection Clause, this Court stated that “an individual’s right to vote for state legislators is unconstitutionally impaired when its weight is in a substantial fashion diluted when compared with votes of citizens living in other parts of the State.” *Id., at 568, 84 S.Ct. 1362.

This Court’s post-*Reynolds* decisions likewise define the one-person, one-vote principle in terms of eligible voters, and thus imply that States should be allocating districts with eligible voters in mind. The Court suggested as much in *Hadley v. Junior College Dist. of Metropolitan Kansas City*, 397 U.S. 50, 90 S.Ct. 791, 25 L.Ed.2d 45 (1970). That case involved Missouri’s system permitting separate school districts to establish a joint junior college district. Six trustees were to oversee the joint district, and they were apportioned on the basis of the relative numbers of school-aged children in each subsidiary district. *Id., at 51, 90 S.Ct. 791. The Court held that this plan violated the Equal Protection Clause because “the trustees of this junior college district [must] be apportioned in a manner
that does not deprive any voter of his right to have his own vote given as much weight, as far as is practicable, as that of any other voter in the junior college district.” *Id.* at 52, 90 S.Ct. 791. In so holding, the Court emphasized that *Reynolds* had “called attention to prior cases indicating that a qualified voter has a constitutional right to vote in elections without having his vote wrongfully denied, debased, or diluted.” *Hadley*, 397 U.S., at 52, 90 S.Ct. 791; see *id.*, at 52–53, 90 S.Ct. 791.

In contrast to this oft-stated aspiration of giving equal treatment to eligible voters, the Court has also expressed a different understanding of the one-person, one-vote principle. In several cases, the Court has suggested that one-person, one-vote protects the interests of all individuals in a district, whether they are eligible voters or not. In *Reynolds*, for example, the Court *1136* said that “the fundamental principle of representative government in this country is one of equal representation for equal numbers of people.” 377 U.S., at 560–561, 84 S.Ct. 1362; see also *ante*, at 1131 (collecting cases). Under this view, States cannot comply with the Equal Protection Clause by equalizing the number of eligible voters in each district. They must instead equalize the total population per district.

In line with this view, the Court has generally focused on total population, not the total number of voters, when determining a State's compliance with the one-person, one-vote requirement. In *Gaffney v. Cummings*, 412 U.S. 735, 750–751, 93 S.Ct. 2321, 37 L.Ed.2d 298 (1973), for example, the Court upheld state legislative districts that had a maximum deviation of 7.83% when measured on a total-population basis. In contrast, in *Chapman v. Meier*, 420 U.S. 1, 21–22, 26–27, 95 S.Ct. 751, 42 L.Ed.2d 766 (1975), the Court struck down a court-ordered reapportionment that had a total deviation of 20.14% based on total population. This plan, in the Court's view, failed to “achieve the goal of population equality with little more than *de minimis* variation.” *Id.*, at 27, 95 S.Ct. 751.

This lack of clarity in our redistricting cases has left States with little guidance about how their political institutions must be structured. Although this Court has required that state legislative districts “be apportioned on a population basis,” *Reynolds*, *supra*, at 568, 84 S.Ct. 1362, it has yet to tell the States whether they are limited in choosing “the relevant population that [they] must equally distribute.”

**II**

This inconsistency (if not opacity) is not merely a consequence of the Court's equivocal statements on one person, one vote. The problem is more fundamental. There is simply no way to make a principled choice between interpreting one person, one vote as protecting eligible voters or as protecting total inhabitants within a State. That is because, though those theories are noble, the Constitution does not make either of them the exclusive means of apportionment for state and local representatives. In guaranteeing to the States a “Republican Form of Government,” Art. IV, § 4, the Constitution did not resolve whether the ultimate basis of representation is the right of citizens to cast an equal ballot or the right of all inhabitants to have equal representation. The Constitution instead reserves these matters to the people. The majority's attempt today to divine a single “‘theory of the Constitution’”—apportionment based on representation, *ante*, at 1128 – 1129 (quoting Cong. Globe, 39th Cong., 1st Sess., 2766–2767 (1866))—rests on a flawed reading of history and wrongly picks one side of a debate that the Framers did not resolve in the Constitution.

**A**

The Constitution lacks a single, comprehensive theory of representation. The Framers understood the tension between majority rule and protecting fundamental rights from majorities. This understanding led to a “mixed” constitutional structure that did not embrace any single theory of representation but instead struck a compromise between those who sought an equitable system of representation and *1137* those who were concerned that the majority would abuse plenary control over public policy. As Madison wrote, “A dependence on the people is no doubt the primary controll on the government; but experience has taught mankind the necessity of auxiliary
precautions.” The Federalist No. 51, p. 349 (J. Cooke ed. 1961). This was the theory of the Constitution. The Framers therefore made difficult compromises on the apportionment of federal representation, and they did not prescribe any one theory of how States had to divide their legislatures.

Because, in the view of the Framers, ultimate political power derives from citizens who were “created equal,” The Declaration of Independence ¶ 2, beliefs in equality of representation—and by extension, majority rule—influenced the constitutional structure. In the years between the Revolution and the framing, the Framers experimented with different ways of securing the political system against improper influence. Of all the “electoral safeguards for the representational system,” the most critical was “equality of representation.” G. Wood, The Creation of the American Republic 1776–1787, p. 170 (1998) (Wood).

The Framers' preference for apportionment by representation (and majority rule) was driven partially by the belief that all citizens were inherently equal. In a system where citizens were equal, a legislature should have “equal representation” so that “equal interests among the people should have equal interests in [the assembly].” Thoughts on Government, in 4 Works of John Adams 195 (C. Adams ed. 1851). The British Parliament fell short of this goal. In addition to having hereditary nobility, more than half of the members of the democratic House of Commons were elected from sparsely populated districts—so-called “rotten boroughs.” Wood 171; Baker, 369 U.S., at 302–303, 82 S.Ct. 691 (Frankfurter, J., dissenting).

The Framers' preference for majority rule also was a reaction to the shortcomings of the Articles of Confederation. Under the Articles, each State could cast one vote regardless of population and Congress could act only with the assent of nine States. Articles of Confederation, Art. IX, cl. 6; id., Art. X; id., Art. XI. This system proved undesirable because a few small States had the ability to paralyze the National Legislature. See The Federalist No. 22, at 140–141 (Hamilton).

Consequently, when the topic of dividing representation came up at the Constitutional Convention, some Framers advocated proportional representation throughout the National Legislature. 1 Records of the Federal Convention of 1787, pp. 471–473 (M. Farrand ed. 1911). Alexander Hamilton voiced concerns about the unfairness of allowing a minority to rule over a majority. In explaining at the Convention why he opposed giving States an equal vote in the National Legislature, Hamilton asked rhetorically, “If ... three states contain a majority of the inhabitants of America, ought they to be governed by a minority?” Id., at 473; see also The Federalist No. 22, at 141 (Hamilton) (objecting to supermajoritarian voting requirements because they allow an entrenched minority to “controil the opinion of a majority respecting the best mode of conducting [the public business]”). James Madison, too, opined that the general Government needed a direct mandate from the people. If federal “power [were] not immediately derived from the people, in proportion to their numbers,” according to Madison, the Federal Government would be as weak as Congress under the Articles of Confederation. 1 Records of the Federal Convention of 1787, at 472.

*1138 In many ways, the Constitution reflects this preference for majority rule. To pass Congress, ordinary legislation requires a simple majority of present members to vote in favor. And some features of the apportionment for the House of Representatives reflected the idea that States should wield political power in approximate proportion to their number of inhabitants. Ante, at 1126 – 1129. Thus, “equal representation for equal numbers of people,” ante, at 1129 (internal quotation marks and emphasis omitted), features prominently in how representatives are apportioned among the States. These features of the Constitution reflect the preference of some members of the founding generation for equality of representation. But, as explained below, this is not the single “theory of the Constitution.”

2

The Framers also understood that unchecked majorities could lead to tyranny of the majority. As a result, many viewed antidemocratic checks as indispensable to republican government. And included among the antidemocratic checks were legislatures that deviated from perfect equality of representation.
The Framers believed that a proper government promoted the common good. They conceived this good as objective and not inherently coextensive with majoritarian preferences. See, e.g., The Federalist No. 1, at 4 (Hamilton) (defining the common good or “public good” as the “true interests” of the community); id., No. 10, at 57 (Madison) (“the permanent and aggregate interests of the community”). For government to promote the common good, it had to do more than simply obey the will of the majority. See, e.g., ibid. (discussing majoritarian factions). Government must also protect fundamental rights. See The Declaration of Independence ¶ 2; 1 W. Blackstone, Commentaries *124 (“[T]he principal aim of society is to protect individuals in the enjoyment of those absolute rights, which are vested in them by the immutable laws of nature”).

Of particular concern for the Framers was the majority of people violating the property rights of the minority. Madison observed that “the most common and durable source of factions, has been the various and unequal distribution of property.” The Federalist No. 10, at 59. A poignant example occurred in Massachusetts. In what became known as Shays' Rebellion, armed debtors attempted to block legal actions by creditors to recover debts. Although that rebellion was ultimately put down, debtors sought relief from state legislatures “under the auspices of Constitutional forms.” Letter from James Madison to Thomas Jefferson (Apr. 23, 1787), in 11 The Papers of Thomas Jefferson 307 (J. Boyd ed. 1955); see Wood 412–413. With no structural political checks on democratic lawmaking, creditors found their rights jeopardized by state laws relieving debtors of their obligation to pay and authorizing forms of payment that devalued the contracts. McConnell, Contract Rights and Property Rights: A Case Study in the Relationship Between Individual Liberties and Constitutional Structures, 76 Cal. L. Rev. 267, 280–281 (1988); see also Fletcher v. Peck, 6 Cranch 87, 137–138, 3 L.Ed. 162 (1810) (Marshall, C.J.) (explaining that the Contract Clause came from the Framers' desire to “shield themselves and their property from the effects of those sudden and strong passions to which men are exposed”).

Because of the Framers' concerns about placing unchecked power in political majorities, the Constitution's majoritarian provisions were only part of a complex republican structure. The Framers also placed several antidemocratic provisions in the Constitution. The original Constitution *1139 permitted only the direct election of representatives. Art. I, § 2, cl. 1. Senators and the President were selected indirectly. See Art. I, § 3, cl. 1; Art. II, § 1, cls. 2–3. And the “Great Compromise” guaranteed large and small States voting equality in the Senate. By malapportioning the Senate, the Framers prevented large States from outvoting small States to adopt policies that would advance the large States' interests at the expense of the small States. See The Federalist No. 62, at 417 (Madison).

These countermajoritarian measures reflect the Framers' aspirations of promoting competing goals. Rejecting a hereditary class system, they thought political power resided with the people. At the same time, they sought to check majority rule to promote the common good and mitigate threats to fundamental rights.

B

As the Framers understood, designing a government to fulfill the conflicting tasks of respecting the fundamental equality of persons while promoting the common good requires making incommensurable tradeoffs. For this reason, they did not attempt to restrict the States to one form of government.

Instead, the Constitution broadly required that the States maintain a “Republican Form of Government.” Art. IV, § 4. But the Framers otherwise left it to States to make tradeoffs and reconcile the competing goals.

Republican governments promote the common good by placing power in the hands of the people, while curtailing the majority's ability to invade the minority's fundamental rights. The Framers recognized that there is no universal formula for accomplishing these goals. At the framing, many state legislatures were bicameral, often reflecting multiple theories of representation. Only “[s]ix of the original thirteen states based representation in both houses of their state legislatures on population.” Hayden, The False Promise of One Person, One Vote, 102 Mich. L. Rev. 213, 218 (2003). In most States, it was common to base representation, at least in part, on the State's political subdivisions, even if those subdivisions varied heavily in their populations. Wood 171; Baker, 369 U.S., at 307–308, 82 S.Ct. 691 (Frankfurter, J., dissenting).
Reflecting this history, the Constitution continued to afford States significant leeway in structuring their “Republican” governments. At the framing, “republican” referred to “[p]lacing the government in the people,” and a “republick” was a “state in which the power is lodged in more than one.” S. Johnson, A Dictionary of the English Language (7th ed. 1785); see also The Federalist No. 39, at 251 (Madison) (“[W]e may define a republic to be, or at least may bestow that name on, a government which derives all its powers directly or indirectly from the great body of the people; and is administered by persons holding their offices during pleasure, for a limited period, or during good behaviour”). By requiring the States to have republican governments, the Constitution prohibited them from having monarchies and aristocracies. See id., No. 43, at 291. Some would argue that the Constitution also prohibited States from adopting direct democracies. Compare Wood 222–226 (“For most constitution-makers in 1776, republicanism was not equated with democracy”) with A. Amar, America's Constitution: A Biography 276–281 (2005) (arguing that the provision prohibited monarchies and aristocracies but not direct democracy); see also The Federalist No. 10, at 62 (Madison) (distinguishing a “democracy” and a “republic”); id., No. 14, at 83–84 (same).

*1140 Beyond that, however, the Constitution left matters open for the people of the States to decide. The Constitution says nothing about what type of republican government the States must follow. When the Framers wanted to deny powers to state governments, they did so explicitly. See, e.g., Art. I, § 10, cl. 1 (“No State shall ... pass any Bill of Attainder, ex post facto Law, or Law impairing the Obligation of Contracts”).

None of the Reconstruction Amendments changed the original understanding of republican government. Those Amendments brought blacks within the existing American political community. The Fourteenth Amendment pressured States to adopt universal male suffrage by reducing a noncomplying State's representation in Congress. Amdt. 14, § 2. And the Fifteenth Amendment prohibited restricting the right of suffrage based on race. Amdt. 15, § 1. That is as far as those Amendments went. As Justice Harlan explained in Reynolds, neither Amendment provides a theory of how much “weight” a vote must receive, nor do they require a State to apportion both Houses of their legislature solely on a population basis. See 377 U.S., at 595–608, 84 S.Ct. 1362 (dissenting opinion). And Justice ALITO quite convincingly demonstrates why the majority errs by reading a theory of equal representation into the apportionment provision in § 2 of the Fourteenth Amendment. See post, at 1146 – 1149 (opinion concurring in judgment).

C

The Court's attempt to impose its political theory upon the States has produced a morass of problems. These problems are antithetical to the values that the Framers embraced in the Constitution. These problems confirm that the Court has been wrong to entangle itself with the political process.

First, in embracing one person, one vote, the Court has arrogated to the Judiciary important value judgments that the Constitution reserves to the people. In Reynolds, for example, the Court proclaimed that “[l]egislators represent people, not trees or acres”; that “[l]egislators are elected by voters, not farms or cities or economic interests”; and that, accordingly, electoral districts must have roughly equal population. 377 U.S., at 562–563, 84 S.Ct. 1362. As I have explained, the Constitution permits, but does not impose, this view. Beyond that, Reynolds' assertions are driven by the belief that there is a single, correct answer to the question of how much voting strength an individual citizen should have. These assertions overlook that, to control factions that would legislate against the common good, individual voting strength must sometimes yield to countermajoritarian checks. And this principle has no less force within States than it has for the federal system. See The Federalist No. 10, at 63–65 (Madison) (recognizing that smaller republics, such as the individual States, are more prone to capture by special interests). Instead of large States versus small States, those interests may pit urban areas versus rural, manufacturing versus agriculture, or those with property versus those without. Cf. Reynolds, supra, at 622–623, 84 S.Ct. 1362 (Harlan, J., dissenting). There is no single method of reconciling these competing interests. And it is not the role of this Court to calibrate democracy in the vain search for an optimum solution.

The Government argues that apportioning legislators by any metric other than total population “risks
rendering residents of this country who are ineligible, unwilling, or unable to vote as invisible or irrelevant to our system of representative democracy.” *1141 Brief for United States as Amicus Curiae 27. But that argument rests on the faulty premise that “our system of representative democracy” requires specific groups to have representation in a specific manner. As I have explained, the Constitution does not impose that requirement. See Parts II–A, II–B, supra. And as the Court recently reminded us, States are free to serve as “‘laboratories’” of democracy. Arizona State Legislature v. Arizona Independent Redistricting Comm’n, 576 U.S. ———, 135 S.Ct. 2652, 2673, 192 L.Ed.2d 704 (2015). That “laboratory” extends to experimenting about the nature of democracy itself.

Second, the Court's efforts to monitor the political process have failed to provide any consistent guidance for the States. Even if it were justifiable for this Court to enforce some principle of majority rule, it has been unable to do so in a principled manner. Our precedents do not address the myriad other ways that minorities (or fleeting majorities) entrench themselves in the political system. States can place policy choices in their constitutions or have supermajoritarian voting rules in a legislative assembly. See, e.g., N.Y. Const., Art. V, § 7 (constitutionalizing public employee pensions); Ill. Const., Art. VII, § 6(g) (requiring a three-fifths vote of the General Assembly to preempt certain local ordinances). In theory, of course, it does not seem to make a difference if a state legislature is unresponsive to the majority of residents because the state assembly requires a 60% vote to pass a bill or because 40% of the population elects 51% of the representatives.

So far as the Constitution is concerned, there is no single “correct” way to design a republican government. Any republic will have to reconcile giving power to the people with diminishing the influence of special interests. The wisdom of the Framers was that they recognized this dilemma and left it to the people to resolve. In trying to impose its own theory of democracy, the Court is hopelessly adrift amid political theory and interest-group politics with no guiding legal principles.

III

This case illustrates the confusion that our cases have wrought. The parties and the Government offer three positions on what this Court's one-person, one-vote cases require States to equalize. Under appellants' view, the Fourteenth Amendment protects the right to an equal vote. Brief for Appellants 26. Appellees, in contrast, argue that the Fourteenth Amendment protects against invidious discrimination; in their view, no such discrimination occurs when States have a rational basis for the population base that they select, even if that base leaves eligible voters malapportioned. Brief for Appellees 16–17. And, the Solicitor General suggests that reapportionment by total population is the only permissible standard because Reynolds recognized a right of “equal representation for equal numbers of people.” Brief for United States as Amicus Curiae 17.

Although the majority does not choose among these theories, it necessarily denies that the Equal Protection Clause protects the right to cast an equally weighted ballot. To prevail, appellants do not have to deny the importance of equal representation. Because States can equalize both total population and total voting power within the districts, they have to show only that the right to cast an equally weighted vote is part of the one-person, one-vote right that we have recognized. But the majority declines to find such a right in the Equal Protection Clause. Ante, at 1132 – 1133. Rather, the majority acknowledges that “[f]or every sentence appellants *1142 quote from the Court's opinions [establishing a right to an equal vote], one could respond with a line casting the one-person, one-vote guarantee in terms of equality of representation, not voter equality.” Ante, at 1131. Because our precedents are not consistent with appellants' position —that the only constitutionally available choice for States is to allocate districts to equalize eligible voters—the majority concludes that appellants' challenge fails. Ante, at 1130 – 1133.

I agree with the majority's ultimate disposition of this case. As far as the original understanding of the Constitution is concerned, a State has wide latitude in selecting its population base for apportionment. See Part II–B, supra. It can use total population, eligible voters, or any other nondiscriminatory voter base. Ibid. And States with a bicameral legislature can have some mixture of these theories, such as one population base for its lower house and another for its upper chamber. Ibid.

Our precedents do not compel a contrary conclusion. Appellants are correct that this Court's precedents have
primarily based its one-person, one-vote jurisprudence on the theory that eligible voters have a right against vote dilution. E.g., Hadley, 397 U.S., at 52–53, 90 S.Ct. 791; Reynolds, 377 U.S., at 568, 84 S.Ct. 1362. But this Court's jurisprudence has vacillated too much for me to conclude that the Court's precedents preclude States from allocating districts based on total population instead. See Burns, 384 U.S., at 92, 86 S.Ct. 1286 (recognizing that States may choose other nondiscriminatory population bases). Under these circumstances, the choice is best left for the people of the States to decide for themselves how they should apportion their legislature.

* * *

There is no single “correct” method of apportioning state legislatures. And the Constitution did not make this Court “a centralized politburo appointed for life to dictate to the provinces the ‘correct’ theories of democratic representation, [or] the ‘best’ electoral systems for securing truly ‘representative’ government.” Holder v. Hall, 512 U.S. 874, 913, 114 S.Ct. 2581, 129 L.Ed.2d 687 (1994) (THOMAS, J., concurring in judgment). Because the majority continues that misguided search, I concur only in the judgment.

Justice ALITO, with whom Justice THOMAS joins except as to Part III–B, concurring in the judgment.

The question that the Court must decide in this case is whether Texas violated the “one-person, one-vote” principle established in Reynolds v. Sims, 377 U.S. 533, 84 S.Ct. 1362, 12 L.Ed.2d 506 (1964), by adopting a legislative redistricting plan that provides for districts that are roughly equal in size. And with one notable exception, Burns v. Richardson, 384 U.S. 73, 86 S.Ct. 1286, 16 L.Ed.2d 376 (1966), this Court's post-Reynolds cases have likewise looked to total population. Moreover, much of the time, creating districts that are equal in total population also results in the creation of districts that are at least roughly equal in eligible voters. I therefore agree that States are permitted to use total population in redistricting plans.

Although this conclusion is sufficient to decide the case before us, Texas asks us to go further and to hold that States, while generally free to use total population statistics, are not barred from using eligible voter statistics. Texas points to Burns, in which this Court held that Hawaii did not violate the one-person, one-vote principle by adopting a plan that sought to equalize the number of registered voters in each district.

Disagreeing with Texas, the Solicitor General dismisses Burns as an anomaly and argues that the use of total population is constitutionally required. The Solicitor General contends that the one-person, one-vote rule means that all persons, whether or not they are eligible to vote, are entitled to equal representation in the legislature. Accordingly, he argues, legislative districts must be equal in total population even if that results in districts that are grossly unequal in the number of eligible voters, a situation that is most likely to arise where aliens are disproportionately concentrated in some parts of a State.

This argument, like that advanced by appellants, implicates very difficult theoretical and empirical questions about the nature of representation. For centuries, political theorists have debated the proper role of representatives, and political scientists have studied the conduct of legislators and the interests that they actually advance. We have no need to wade into these waters in this case, and I would not do so. Whether a State is permitted to use some measure other than total population is an important and sensitive question that we can consider if and when we have before us a state districting plan that, unlike the current Texas plan,
uses something other than total population as the basis for equalizing the size of districts.

III

A

The Court does not purport to decide whether a State may base a districting plan on something other than total population, but the Court, picking up a key component of the Solicitor General's argument, suggests that the use of total population is supported by the Constitution's formula for allocating seats in the House of Representatives among the States. Because House seats are allocated based on total population, the Solicitor General argues, the one-person, one-vote principle requires districts that are equal in total population. I write separately primarily because I cannot endorse this meretricious argument.

First, the allocation of congressional representation sheds little light on the question presented by the Solicitor General's argument because that allocation plainly violates one person, one vote. This is obviously true with respect to the Senate: Although all States have equal representation in the Senate, the most populous State (California) has 66 times as many people as the least populous (Wyoming). See United States Census 2010, Resident Population Data, http://www.census.gov/2010census/data/apportionment-pop-text.php. And even the allocation of House seats does not comport with one person, one vote. Every State is entitled to at least one seat in the House, even if the State's population is lower than the average population of House districts nationwide. U.S. Const., Art. I, § 2, cl. 3. Today, North Dakota, Vermont, and Wyoming all fall into that category. See United States Census 2010, Apportionment Data, http://www.census.gov/2010census/data/apportionment-data-text.php. If one person, one vote applied to allocation of House seats among States, I very much doubt the Court would uphold a plan where one Representative represents fewer than 570,000 people in Wyoming but nearly a million people next door in Montana.

Second, *Reynolds v. Sims* squarely rejected the argument that the Constitution's allocation of congressional representation establishes the test for the constitutionality of a state legislative districting plan. Under one Alabama districting plan before the Court in that case, seats in the State Senate were allocated by county, much as seats in the United States Senate are allocated by State. (At that time, the upper houses *1145 in most state legislatures were similar in this respect.) The Reynolds Court noted that “[t]he system of representation in the two Houses of the Federal Congress” was “conceived out of compromise and concession indispensable to the establishment of our federal republic.” 377 U.S., at 574, 84 S.Ct. 1362. Rejecting Alabama's argument that this system supported the constitutionality of the State's apportionment of senate seats, the Court concluded that “the Founding Fathers clearly had no intention of establishing a pattern or model for the apportionment of seats in state legislatures when the system of representation in the Federal Congress was adopted.” Id., at 573, 84 S.Ct. 1362; see also *Gray v. Sanders*, 372 U.S. 368, 378, 83 S.Ct. 801, 9 L.Ed.2d 821 (1963).

Third, as the Reynolds Court recognized, reliance on the Constitution's allocation of congressional representation is profoundly ahistorical. When the formula for allocating House seats was first devised in 1787 and reconsidered at the time of the adoption of the Fourteenth Amendment in 1868, the overwhelming concern was far removed from any abstract theory about the nature of representation. Instead, the dominant consideration was the distribution of political power among the States.

The original Constitution's allocation of House seats involved what the Reynolds Court rather delicately termed “compromise and concession.” 377 U.S., at 574, 84 S.Ct. 1362. Seats were apportioned among the States “according to their respective Numbers,” and these “Numbers” were “determined by adding to the whole Number of free Persons ... three fifths of all other Persons.” Art. I, § 2, cl. 3. The phrase “all other Persons” was a euphemism for slaves. Delegates to the Constitutional Convention from the slave States insisted on this infamous clause as a condition of their support for the Constitution, and the clause gave the slave States more power in the House and in the electoral college than they would have enjoyed if only free persons had been counted. These slave-state delegates did not demand slave representation based on some philosophical notion that “representatives serve all residents, not just those eligible or registered to vote.” Ante, at 1132. 6
B

The Court's account of the original Constitution's allocation also plucks out of context Alexander Hamilton's statement on apportionment. The Court characterizes Hamilton's words (more precisely, Robert Yates's summary of his fellow New Yorker's words) as endorsing apportionment by total population, and positions those words as if Hamilton were talking about apportionment in the House. Ante, at 1127. Neither is entirely accurate. The "quote" comes from the controversy over Senate apportionment, where the debate turned on whether to apportion by population at all. See generally 1 Records of the Federal Convention of 1787, pp. 470–474 (M. Farrand ed. 1911). Hamilton argued in favor of allocating Senate seats by population:

"The question, after all is, is it our interest in modifying this general government to sacrifice individual rights to the preservation of the rights of an artificial being, called states? There can be no truer principle than this—that every individual of the community at large has an equal right to the protection of government. If therefore three states contain a majority of the inhabitants of America, ought they to be governed by a minority? Would the inhabitants of the great states ever submit to this? If the smaller states maintain this principle, through a love of power, will not the larger, from the same motives, be equally tenacious to preserve their power?" Id., at 473.

As is clear from the passage just quoted, Hamilton (according to Yates) thought the fight over apportionment was about naked power, not some lofty ideal about the nature of representation. That interpretation is confirmed by James Madison's summary of the same statement by Hamilton: "The truth is it [meaning the debate over apportionment] is a contest for power, not for liberty.... The State of Delaware having 40,000 souls will lose power, if she has 1/10 only of the votes allowed to Pa. having 400,000." Id., at 466. Far from "[e]ndorsing apportionment based on total population," ante, at 1127, Hamilton was merely acknowledging the obvious: that apportionment in the new National Government would be the outcome of a contest over raw political power, not abstract political theory.

C

After the Civil War, when the Fourteenth Amendment was being drafted, the question of the apportionment formula arose again. Thaddeus Stevens, a leader of the so-called radical Republicans, unsuccessfully proposed that apportionment be based on eligible voters, rather than total population. The opinion of the Court suggests that the rejection of Stevens' proposal signified the adoption of the theory that representatives are properly understood to represent all of the residents of their districts, whether or not they are eligible to vote. Ante, at 1127 – 1129. As was the case in 1787, however, it was power politics, not democratic theory, that carried the day.

In making his proposal, Stevens candidly explained that the proposal's primary aim was to perpetuate the dominance of the Republican Party and the Northern States. Cong. Globe, 39th Cong., 1st Sess., 74 (1865); Van Alstyne, The Fourteenth Amendment, The "Right" to Vote, and the Understanding of the Thirty-Ninth Congress, 1965 S. Ct. Rev. 33, 45–47 (Van Alstyne). As Stevens spelled out, if House seats were based on total population, the power of the former slave States would be magnified. Prior to the Civil War, a slave had counted for only three-fifths of a person for purposes of the apportionment of House seats. As a result of the Emancipation Proclamation and the Thirteenth Amendment, the former slaves would now be fully counted even if they were not permitted to vote. By Stevens' calculation, this would give the South 13 additional votes in both the House and the electoral college. Cong. Globe, 39th *1147 Cong., 1st Sess., 74 (1865); Van Alstyne 46.

Stevens' proposal met with opposition in the Joint Committee on Reconstruction, including from, as the majority notes, James Blaine. Ante, at 1128. Yet, as it does with Hamilton's, the majority plucks Blaine's words out of context:

"[W]e have had several propositions to amend the Federal Constitution with respect to the basis of representation in Congress. These propositions ... give to the States in future a representation proportioned to their voters instead of their inhabitants.

"The effect contemplated and intended by this change is perfectly well understood, and on all hands frankly
avowed. It is to deprive the lately rebellious States of the unfair advantage of a large representation in this House, based on their colored population, so long as that population shall be denied political rights by the legislation of those States....

“The direct object thus aimed at, as it respects the rebellious States, has been so generally approved that little thought seems to have been given to the incidental evils which the proposed constitutional amendment would inflict on a large portion of the loyal States—evils, in my judgment, so serious and alarming as to lead me to oppose the amendment in any form in which it has yet been presented. As an abstract proposition no one will deny that population is the true basis of representation; for women, children, and other non-voting classes may have as vital an interest in the legislation of the country as those who actually deposit the ballot....

“If voters instead of population shall be made the basis of representation certain results will follow, not fully appreciated perhaps by some who are now urgent for the change.” Cong. Globe, 39th Cong., 1st Sess., 141 (1865).

The “not fully appreciated” and “incidental evil[s]” was, in Blaine's view, the disruption to loyal States' representation in Congress. Blaine described how the varying suffrage requirements in loyal States could lead to, for instance, California's being entitled to eight seats in the House and Vermont's being entitled only to three, despite their having similar populations. Ibid.; see also 2 B. Ackerman, We the People: Transformations 164, 455, n. 5 (1998); Van Alstyne 47, 70. This mattered to Blaine because both States were loyal and so neither deserved to suffer a loss of relative political power. Blaine therefore proposed to apportion representatives by the “whole number of persons except those to whom civil or political rights or privileges are denied or abridged by the constitution or laws of any State on account of race or color.” Cong. Globe, 39th Cong., 1st Sess., 142.

“This is a very simple and very direct way, it seems to me, of reaching the result aimed at without embarrassment to any other question or interest. It leaves population as heretofore the basis of representation, does not disturb in any manner the harmonious relations of the loyal States, and it conclusively deprives the southern States of all representation in Congress on account of the colored population so long as those States may choose to abridge or deny to that population the political rights and privileges accorded to others.” Ibid.

As should be obvious from these lengthy passages, Blaine recognized that the “generally approved” “result aimed at” was to deprive southern States of political power; far from quibbling with that aim, he sought to achieve it while limiting the collateral damage to the loyal northern States. See Van Alstyne 47.

**1148** Roscoe Conkling, whom the majority also quotes, ante, at 1128, seemed to be as concerned with voter-based apportionment's “narrow[ing] the basis of taxation, and in some States seriously,” as he was with abstract notions of representational equality. Cong. Globe, 39th Cong., 1st Sess., 358; id., at 359 (“representation should go with taxation”); ibid. (apportionment by citizenship “would narrow the basis of taxation and cause considerable inequalities in this respect, because the number of aliens in some States is very large, and growing larger now, when emigrants reach our shores at the rate of more than a State a year”). And Hamilton Ward, also quoted by the majority, ante, at 1128, was primarily disturbed by “[t]he fact that one South Carolinian, whose hands are red with the blood of fallen patriots, and whose skirts are reeking with the odors of Columbia and Andersonville, will have a voice as potential in these Halls as two and a half Vermont soldiers who have come back from the grandest battle-fields in history maimed and scarred in the contest with South Carolina traitors in their efforts to destroy this Government”—and only secondarily worried about the prospect of “taxation without representation.” Cong. Globe, 39th Cong., 1st Sess., 434.

Even Jacob Howard, he of the “theory of the Constitution” language, ante, at 1128 – 1129, bemoaned the fact that basing representation on total population would allow southern States “to obtain an advantage which they did not possess before the rebellion and emancipation.” Cong. Globe, 39th Cong., 1st Sess., 2766.

“I object to this. I think they cannot very consistently call upon us to grant them an additional number of Representatives simply because in consequence of their own misconduct they have lost the property [meaning slaves, whom slaveholders considered to be property] which they once possessed, and which served as a basis in great part of their representation.” Ibid. The list could go on. The bottom line is that in the leadup to the Fourteenth
Amendment, claims about representational equality were invoked, if at all, only in service of the real goal: preventing southern States from acquiring too much power in the National Government.

After much debate, Congress eventually settled on the compromise that now appears in § 2 of the Fourteenth Amendment. Under that provision, House seats are apportioned based on total population, but if a State wrongfully denies the right to vote to a certain percentage of its population, its representation is supposed to be reduced proportionally. Enforcement of this remedy, however, is dependent on action by Congress, and—regrettably—the *1149 remedy was never used during the long period when voting rights were widely abridged. Amar 399.

In light of the history of Article I, § 2, of the original Constitution and § 2 of the Fourteenth Amendment, it is clear that the apportionment of seats in the House of Representatives was based in substantial part on the distribution of political power among the States and not merely on some theory regarding the proper nature of representation. It is impossible to draw any clear constitutional command from this complex history.

* * *

For these reasons, I would hold only that Texas permissibly used total population in drawing the challenged legislative districts. I therefore concur in the judgment of the Court.

All Citations


Footnotes

* The syllabus constitutes no part of the opinion of the Court but has been prepared by the Reporter of Decisions for the convenience of the reader. See United States v. Detroit Timber & Lumber Co., 200 U.S. 321, 337, 26 S.Ct. 282, 50 L.Ed. 499.

1 In Avery v. Midland County, 390 U.S. 474, 485–486, 88 S.Ct. 1114, 20 L.Ed.2d 45 (1968), the Court applied the one-person, one-vote rule to legislative apportionment at the local level.

2 Maximum population deviation is the sum of the percentage deviations from perfect population equality of the most- and least-populated districts. See Chapman v. Meier, 420 U.S. 1, 22, 95 S.Ct. 751, 42 L.Ed.2d 766 (1975). For example, if the largest district is 4.5% overpopulated, and the smallest district is 2.3% underpopulated, the map's maximum population deviation is 6.8%.


4 Various plaintiffs had challenged Texas' State House, State Senate, and congressional maps under, inter alia, § 2 of the Voting Rights Act of 1965. They sought and received an injunction barring Texas' use of the new maps until those maps received § 5 preclearance. See Allen v. State Bd. of Elections, 393 U.S. 544, 561, 89 S.Ct. 817, 22 L.Ed.2d 1 (1969) (“[A]n individual may have a suit for declaratory judgment and injunctive relief, claiming that a state requirement is covered by § 5, but has not been subjected to the required federal scrutiny.”).

5 Apart from objecting to the baseline, appellants do not challenge the Senate map's 8.04% total-population deviation. Nor do they challenge the use of a total-population baseline in congressional districting.
As the District Court noted, the Ninth Circuit has likewise rejected appellants' theory, i.e., that voter population must be roughly equalized. See Garza v. County of L. A., 918 F.2d 763, 773–776 (C.A.9 1990). Also declining to mandate voter-eligible apportionment, the Fourth and Fifth Circuits have suggested that the choice of apportionment base may present a nonjusticiability political question. See Chen v. Houston, 206 F.3d 502, 528 (C.A.5 2000) (“[T]his eminently political question has been left to the political process.”); Daly v. Hunt, 93 F.3d 1212, 1227 (C.A.4 1996) (“This is quintessentially a decision that should be made by the state, not the federal courts, in the inherently political and legislative process of apportionment.”).

In the District Court, appellants suggested that districting bodies could also comply with the one-person, one-vote rule by equalizing the registered-voter populations of districts, but appellants have not repeated that argument before this Court. See Tr. of Oral Arg. 22–23.

As the United States observes, the “choice of constitutional language reflects the historical fact that when the Constitution was drafted and later amended, the right to vote was not closely correlated with citizenship.” Brief for United States as Amicus Curiae 18. Restrictions on the franchise left large groups of citizens, including women and many males who did not own land, unable to cast ballots, yet the Framers understood that these citizens were nonetheless entitled to representation in government.

Justice ALITO observes that Hamilton stated this principle while opposing allocation of an equal number of Senate seats to each State. Post, at 1136–1137 (opinion concurring in judgment). That context, however, does not diminish Hamilton’s principled argument for allocating seats to protect the representational rights of “every individual of the community at large.” 1 Records of the Federal Convention of 1787, p. 473 (M. Farrand ed. 1911). Justice ALITO goes on to quote James Madison for the proposition that Hamilton was concerned, simply and only, with “the outcome of a contest over raw political power.” Post, at 1146. Notably, in the statement Justice ALITO quotes, Madison was not attributing that motive to Hamilton; instead, according to Madison, Hamilton was attributing that motive to the advocates of equal representation for States. Farrand, supra, at 466. One need not gainsay that Hamilton’s backdrop was the political controversies of his day. That reality, however, has not deterred this Court’s past reliance on his statements of principle. See, e.g., Printz v. United States, 521 U.S. 898, 910–924, 117 S.Ct. 2365, 138 L.Ed.2d 914 (1997).

Justice ALITO adds a third, claiming “the allocation of congressional representation sheds little light” on the meaning of the one-person, one-vote rule “because that allocation plainly violates one person, one vote.” Post, at 1144. For this proposition, Justice ALITO notes the constitutional guarantee of two Senate seats and at least one House seat to each State, regardless of its population. But these guarantees bear no kinship to the separate question that dominated the Fourteenth Amendment’s ratification debates: After each State has received its guaranteed House seat, on what basis should additional seats be allocated?

Justice ALITO asserts that we have taken the statements of the Fourteenth Amendment’s Framers “out of context.” Post, at 1148. See also post, at 1148 (“[C]laims about representational equality were invoked, if at all, only in service of the real goal: preventing southern States from acquiring too much power in the national government.”). Like Alexander Hamilton, see supra, at 1127, n. 9, the Fourteenth Amendment’s Framers doubtless made arguments rooted in practical political realities as well as in principle. That politics played a part, however, does not warrant rejecting principled argument. In any event, motivations aside, the Framers’ ultimate choice of total population rather than voter population is surely relevant to whether, as appellants now argue, the Equal Protection Clause mandates use of voter population rather than total population.

Appellants also observe that standing in one-person, one-vote cases has rested on plaintiffs’ status as voters whose votes were diluted. But the Court has not considered the standing of nonvoters to challenge a map malapportioned on a total-population basis. This issue, moreover, is unlikely ever to arise given the ease of finding voters willing to serve as plaintiffs in malapportionment cases.

In contrast to the insubstantial evidence marshaled by appellants, the United States cites several studies documenting the uneven distribution of immigrants throughout the country during the 1960’s. See Brief for United States as Amicus Curiae 16.

Appellants point out that constituents have no constitutional right to equal access to their elected representatives. But a State certainly has an interest in taking reasonable, nondiscriminatory steps to facilitate access for all its residents.

Insofar as appellants suggest that Texas could have roughly equalized both total population and eligible-voter population, this Court has never required jurisdictions to use multiple population baselines. In any event, appellants have never presented a map that manages to equalize both measures, perhaps because such a map does not exist, or because such a map would necessarily ignore other traditional redistricting principles, including maintaining communities of interest and respecting municipal boundaries.
The Court's opinions have used “one person, one vote” and “one man, one vote” interchangeably. Compare, e.g., Gray v. Sanders, 372 U.S. 368, 381, 83 S.Ct. 801, 9 L.Ed.2d 821 (1963) (“one person, one vote”), with Hadley v. Junior College Dist. of Metropolitan Kansas City, 397 U.S. 50, 51, 90 S.Ct. 791, 25 L.Ed.2d 45 (1970) (“one man, one vote” (internal quotation marks omitted)). Gray used “one person, one vote” after noting the expansion of political equality over our history—including adoption of the Nineteenth Amendment, which guaranteed women the right to vote. 372 U.S., at 381, 83 S.Ct. 801.

1 See, e.g., H. Pitkin, The Concept of Representation 4 (1967) ( “[D]iscussions of representation are marked by long-standing, persistent controversies which seem to defy solution”); ibid. (“Another vexing and seemingly endless controversy concerns the proper relation between representative and constituents”); Political Representation i (I. Shapiro, S. Stokes, E. Wood, & A. Kirshner eds. 2009) (“[R]elations between the democratic ideal and the everyday practice of political representation have never been well defined and remain the subject of vigorous debate among historians, political theorists, lawyers, and citizens”); id., at 12 (“[W]e need a better understanding of these complex relations in their multifarious parts before aspiring to develop any general theory of representation”); S. Dovi, Political Representation, The Stanford Encyclopedia of Philosophy (E. Zalta ed. Spring 2014) (“Our common understanding of political representation is one that contains different, and conflicting, conceptions of how political representatives should represent and so holds representatives to standards that are mutually incompatible”), online at http://plato.stanford.edu/archives/spr2014/entries/political-representation (all Internet materials as last visited Mar. 31, 2016); ibid. (“What exactly representatives do has been a hotly contested issue”).

2 See, e.g., Andeweg, Roles in Legislatures, in The Oxford Handbook of Legislative Studies 268 (S. Martin, T. Saalfeld, & K. Strom eds. 2014) (explaining that the social sciences have not “succeeded in distilling [an] unambiguous concept[ion] of the “role” of a legislator”); Introduction, id., at 11 (“Like political science in general, scholars of legislatures approach the topic from different and, at least partially, competing theoretical perspectives”); Diermeier, Formal Models of Legislatures, id., at 50 (“While the formal study of legislative politics has come a long way, much remains to be done”); Best & Vogel, The Sociology of Legislators and Legislatures, id., at 75–76 (“Stable representative democracies are ... institutional frameworks and informal arrangements which achieve an equilibrium between the competing demands [of constituents and political opponents]. How this situation affects the daily interactions of legislators is largely unknown”).

3 As Justice THOMAS notes, ante, at 1137 – 1138 (opinion concurring in judgment), the plan for the House of Representatives was based in large part on the view that there should be “equality of representation,” but that does not answer the question whether it is eligible voters (as appellants urge), all citizens, or all residents who should be equally represented. The Constitution allocates House seats based on total inhabitants, but as I explain, the dominant, if not exclusive, reason for that choice was the allocation of political power among the States.

4 The Court brushes off the original Constitution’s allocation of congressional representation by narrowing in on the Fourteenth Amendment’s ratification debates. Ante, at 1129, n. 10. But those debates were held in the shadow of that original allocation. And what Congress decided to do after those debates was to retain the original apportionment formula—minus the infamous three-fifths clause—and attach a penalty to the disenfranchisement of eligible voters. In short, the Fourteenth Amendment made no structural changes to apportionment that bear on the one-person, one-vote rule.

5 See A. Amar, America’s Constitution: A Biography 87–98 (2005) (Amar); id., at 94 (“The best justification for the three-fifths clause sounded in neither republican principle nor Revolutionary ideology, but raw politics”); see also id., at 88–89 (explaining that the “protective coloring” camouflaging the slave States’ power grab “would have been wasted had the Constitution pegged apportionment to the number of voters, with a glaringly inconsistent add-on for nonvoting slaves”); cf. G. Van Cleve, A Slaveholders’ Union 126 (2010) (“[T]he slave states saw slave representation as a direct political protection for wealth consisting of slave property against possible Northern attacks on slavery, and told the Convention unequivocally that they needed such protection in order to obtain ratification of the Constitution”); id., at 133–134 (“The compromise on representation awarded disproportionate shares of representative influence to certain vested political-economy interests, one of which was the slave labor economies”).

6 See Amar 92 (“But masters did not as a rule claim to virtually represent the best interests of their slaves. Masters, after all, claimed the right to maim and sell slaves at will, and to doom their yet unborn posterity to perpetual bondage. If this could count as virtual representation, anything could”).

7 Section 2 provides:

“Representatives shall be apportioned among the several States according to their respective numbers, counting the whole number of persons in each State, excluding Indians not taxed. But when the right to vote at any election for the choice of electors for President and Vice President
of the United States, Representatives in Congress, the Executive and Judicial officers of a State, or the members of the Legislature thereof, is denied to any of the male inhabitants of such State, being twenty-one years of age, and citizens of the United States, or in any way abridged, except for participation in rebellion, or other crime, the basis of representation therein shall be reduced in the proportion which the number of such male citizens shall bear to the whole number of male citizens twenty-one years of age in such State."

Needless to say, the reference in this provision to “male inhabitants ... being twenty-one years of age” has been superseded by the Nineteenth and Twenty-sixth Amendments. But notably the reduction in representation is pegged to the proportion of (then) eligible voters denied suffrage. Section 2’s representation-reduction provision makes no appearance in the Court’s structural analysis.
**Historical Information: The U.S. Census**

Currently, the Census Bureau does ask citizenship on its American Community Survey (ACS) and the Current Population Survey. The ACS is a survey conducted nationwide every year among 3.5 million addresses. The Current Population Survey is a monthly survey that is the primary source of labor force statistics for the population of the United States. However, while it has asked about citizenship status, the Census Bureau has never asked about the legal status of respondents.

The Census Bureau first asked a citizenship question in 1820 when the census separately counted “foreigners not naturalized.” The question was asked this way until 1850 when officials asked place of birth, a question that also appeared on the 1860 census.

The 1870 census asked the same questions on nativity, as well as questions on the nativity of each individual’s parents. The 1870 census also had questions on citizenship for males over the age of 21. The 1880 census kept questions on individual and parental nativity, but removed questions on citizenship.

The 1890 census also asked individual and parental nativity, but included additional questions on naturalization and tenure in the United States for foreign-born men over the age of 21. The questions for 1900 and 1910, although slightly different, followed the same general outline as those of 1890. In 1920 and 1930, all foreign-born respondents, regardless of age and sex, received questions on naturalization status.

In 1940, while the questions about individual nativity and naturalization remained, questions about parental nativity moved to the supplemental questions, which were only asked of 5% of respondents. In 1950, that sampling size grew to 20%. In 1960, although questions about individual and parental nativity remained for all, there were no questions about citizenship or naturalization.

Starting with 1970, the census moved to a mailout/mailback format. Questions about nativity appeared on the “long form” census form sent to 20% of households and only foreign-born were asked to answer questions about citizenship status and time period of arrival to the United States. From 1980-2000 the long form asked citizenship status of all sample respondents, not just foreign-born. Foreign born were asked for a time range or year that they arrived in the United States. In 2005, the ACS replaced the long-form decennial census questionnaire.

As we move through this formal evaluation process, we will keep the public updated as we look forward to delivering the planned questions for the 2020 Census and the ACS to Congress by March 31, 2018.

Our goal is to conduct a complete and accurate 2020 Census. The Census Bureau remains committed to reflecting the information needs of our changing society as we continue to examine the effectiveness of decennial census questions to collect accurate data on America’s people, places, and economy.

*All historical census questionnaires can be found at:*
[https://www.census.gov/history/www/through_the_decades/index_of_questions/1820_1.html](https://www.census.gov/history/www/through_the_decades/index_of_questions/1820_1.html)
**Historical Information: The U.S. Census**

Currently, the Census Bureau does ask citizenship on its American Community Survey (ACS) and the Current Population Survey.

- The ACS is an annual, nationwide survey conducted among 3.5 million addresses.
- The Current Population Survey is a monthly survey that is the primary source of labor force statistics for the population of the United States.
- The Census Bureau has never asked about the legal status of respondents.

1820: citizenship question first asked when the census separately counted “foreigners not naturalized.”

1850, 1960: census asked place of birth.

1870: census asked about nativity and the nativity of each individual’s parents. Also had questions on citizenship for males over the age of 21.

1880: census kept questions on individual and parental nativity, but removed citizenship question.

1890: census asked individual and parental nativity, but also included additional questions on naturalization and tenure in the United States for foreign-born men over the age of 21.

1900, 1910: although slightly different, questions followed the same general outline as 1890.

1920, 1930: all foreign-born respondents, regardless of age and sex, received questions on naturalization status.

1940: while the questions about individual nativity and naturalization remained, questions about parental nativity moved to the supplemental questions, which were only asked of 5% of respondents.

1950: sampling size grew to 20%.

1960: although questions about individual and parental nativity remained for all, there were no questions about citizenship or naturalization.

1970: census moved to a mailout/mailback format. Questions about nativity appeared on the “long form” census form sent to 20% of households and only foreign-born were asked to answer questions about citizenship status and time period of arrival to the United States.

1980-2000: the long form asked citizenship status of all sample respondents, not just foreign-born. Foreign born were asked for a time range or year that they arrived in the United States.

2005: the ACS replaced the long-form decennial census questionnaire.
As we move through this formal evaluation process, we will keep the public updated as we look forward to delivering the planned questions for the 2020 Census and the ACS to Congress by March 31, 2018.

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On behalf of the U.S. Census Bureau, I would like to thank the House Subcommittee on Federalism and the Census Committee on Government Reform U.S. House of Representatives

6 December 2005

Today's hearing focuses on the question of whether the decennial census should count, for purposes of apportionment, all inhabitants of the United States or more narrowly define its task to count only citizens. Our testimony this morning does not address the merits of the question, but focuses instead on the practical effects such a change might have on operational considerations and the accuracy of the census.

The Constitution and the Census Act of 1790
The census is one of our nation's oldest activities. It is constitutionally required and is used as the basis to apportion the U.S. House of Representatives and to delineate congressional districts within the states. Article I, Section 2 directs that an "actual enumeration" was to occur every ten years. The first census law, the Census Act of 1790, was enacted just two years after the Constitution was ratified. The Census Act of 1790 instructed "the marshals of the several districts of the United States shall be, and they are hereby authorized and required to cause the number of the inhabitants within their respective districts to be taken."

The basic instruction to count inhabitants living in the United States has not been changed by any subsequent census law. It is the foundation of the Census Bureau's decennial census task. Counting every inhabitant living in the United States defines the scope of our operations and prescribes the need for accuracy in the count. The Census Bureau has developed rational, operationally feasible procedures in order to count every person and does not separately count the number of citizens, legal residents, visitors on temporary visas, or illegal immigrants, although the citizenship issue is addressed in the American Community Survey sample. To make such distinctions for purposes of enumeration would not only require changes to the decennial census questionnaire itself but different procedures and methodologies to attempt to obtain accurate information about residency or citizenship status from all respondents.
Operational Issues
The decennial census is a complex and daunting task. It requires unparalleled cooperation in order to reach every state, county, city, town, neighborhood, and street in order to count every household in America. It is the largest peacetime mobilization undertaken by the federal government, involving years of planning and testing; hundreds of thousands of enumerators; billions in federal expenditures; and the cooperation of every household in America. Securing this cooperation from each community, household, and person is difficult, but crucial to the accuracy of the census.

With each modern census, the Census Bureau has documented decreasing levels of cooperation and response rates. The mail response rate determines the non-response follow-up workload and is an important factor in the cost and overall success of the census. In 1970, the overall mail response rate was nearly 80 percent. In 1980, it fell to about 75 percent, and by 1990 it had fallen to 65 percent. Census 2000 held at nearly 65 percent and seems to suggest that the Census Bureau, with the help of unprecedented congressional and community support, as well as paid advertising, was able to hold this trend in check. But we know the American public is becoming increasingly wary of issues such as protection of privacy, identity theft and unwarranted government intrusion. For the 2010 Census, we project further declines in public cooperation, even if we repeat all the efforts undertaken in 2000. We believe some of our efforts to reengineer the 2010 Census, especially the use of a short-form only census, can mitigate this trend. However, asking about citizenship could negatively impact this trend and could impair the ability of the Census Bureau to conduct an accurate census.

The Census Bureau relies not only on individual cooperation but also on public support to maintain the high level of accuracy expected from the decennial census. Public support is built and demonstrated through media coverage, public endorsement, and word of mouth. In 2000, there was an unprecedented effort to engage help from members of Congress, local officials, community organizations, schools, and the media to encourage public support. We relied on these partners to help educate the public, especially hard-to-count communities, about the constitutional requirement and the uses of census data in the distribution of public resources, and to assure fears about participating and the possible use of data against respondents.

Asking all respondents for additional information relating to citizenship might raise additional fears about responding to the census. Even U.S. citizens may be wary of answering questions about citizenship. Countering these concerns and fears could require additional efforts to secure public cooperation. Moreover, because the census is conducted through self-enumeration, the Census Bureau could not verify whether the responses were accurate. The mere act of asking about the residency status of an individual may confuse or discourage respondents, even legal residents and citizens, and could affect the overall accuracy of the census.

Conclusion
Accuracy is important because the census is used to apportion congressional seats, fulfilling the obligation as outlined in Article I of the Constitution. Mr. Chairman, thank you for this opportunity, and I hope that this information is informative and will help the Congress as it considers this issue. I would be happy to answer your questions and concerns.
### Population Items on Principal Census Questionnaires: 1790 to 1890

(excludes identification items, screening questions, and other information collected, but not intended for tabulation)

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Measuring America

U.S. Census Bureau
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Excludes identification items, screening questions, and other information collected, but not intended for tabulation.
**Population Items on Principal Census Questionnaires: 1790 to 1890—Con.**

*Excludes identification items, screening questions, and other information collected, but not intended for tabulation.*

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¹ Available on supplemental questionnaires at the National Archives and Records Administration.
² Sample question.
(1) Free White persons only.
(2) Question only asked of free inhabitants.
(3) Question was whether insane or idiotic.
(4) In 1860, place of birth was asked on a sample basis generally, but on a 100-percent basis in New York and Puerto Rico. Citizenship was asked only in New York and Puerto Rico, where it was a 100-percent item.
(5) Question was only whether parents were foreign born.
(6) For males 21 years of age or over.
(7) Whether person could speak English. In 1900, this was the only question; in 1920 and 1930 this question was in addition to request for mother tongue.
(8) Asked only outside cities.
(9) On housing portion of questionnaire.
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### Population Items on The General Schedules: 1900 to 2000—Con.

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</table>

**For Grandparent households:**

| Are grandchildren under 18 living within the household?       | -    | -    | -    | -    | -    | -    | -    | -    | -    | -    | Xs   |
| Are grandparents Responsible for a Grandchild's basic needs? | -    | -    | -    | -    | -    | -    | -    | -    | -    | -    | -    |
| Length of responsibility for grandchild                       | -    | -    | -    | -    | -    | -    | -    | -    | -    | -    | Xs   |
| Veteran status                                                | -    | X    | -    | X    | Xs   | Xs   | Xs   | Xs   | Xs   | Xs   | Xs   |
| Length of service                                             | -    | -    | -    | -    | -    | -    | -    | -    | -    | -    | Xs   |
| Whether wife or widow of veteran                              | -    | -    | -    | -    | -    | -    | -    | -    | -    | -    | -    |
| If child of veteran, is father dead?                          | -    | -    | -    | -    | -    | -    | -    | -    | -    | -    | -    |
| In service date                                               | -    | -    | -    | -    | -    | -    | -    | -    | Xs   | Xs   | Xs   |
| Farm residence                                               | X    | X    | X    | X    | X    | X    | Xs(6,9)| Xs   | Xs   | Xs   | Xs   |
| Farm residence in a previous year                             | -    | -    | -    | -    | -    | -    | Xs   | Xs   | Xs   | Xs   | Xs   |
| Place of residence in a previous year                         | -    | -    | -    | -    | -    | -    | Xs   | Xs   | Xs   | Xs   | Xs   |
| Year moved to present residence                               | -    | -    | -    | -    | -    | -    | Xs   | Xs   | Xs9  | Xs9  | Xs9  |
| Industry                                                     | -    | X    | X    | X    | X    | X    | Xs   | Xs   | Xs   | Xs   | Xs   |
| Occupation                                                   | X    | X    | X    | X    | X    | X    | Xs   | Xs   | Xs   | Xs   | Xs   |
| Class of worker                                               | -    | X    | X    | X    | X    | X    | Xs   | Xs   | Xs   | Xs   | Xs   |
| Private or public nonemergency work, or public emergency work | -    | -    | -    | -    | -    | -    | X    | -    | -    | -    | -    |
| Employment status                                            | -    | -    | -    | ?X   | X    | X    | Xs   | Xs   | Xs   | Xs   | Xs   |
| Duration of unemployment                                      | X    | X    | -    | ?X   | X    | Xs   | -    | -    | -    | Xs   | Xs   |
| Year last worked                                              | -    | -    | -    | -    | -    | -    | Xs   | Xs   | Xs   | Xs   | Xs   |

**Economic Characteristics**

| Weeks worked in preceding year                                | -    | -    | -    | -    | ?X   | X    | Xs   | Xs   | Xs   | Xs   | Xs   |
| Hours worked in preceding week                                | -    | -    | -    | ?X   | X    | Xs   | Xs   | Xs   | Xs   | Xs   | Xs   |
| Activity 5 years ago                                         | -    | -    | -    | -    | -    | -    | Xs   | -    | -    | -    | -    |
### Population Items on The General Schedules: 1900 to 2000—Con.

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See also supplemental questionnaires.
- Sample question.
- (1) Free White persons only.
- (2) Question only asked of free inhabitants.
- (3) Question was whether insane or idiotic.
- (4) In 1960, place of birth was asked on a sample basis generally, but on a 100-percent basis in New York and Puerto Rico. Citizenship was asked only in New York and Puerto Rico, where it was a 100-percent item.
- (5) Question was only whether parents were foreign born.
- (6) For males 21 years of age or over.
- (7) Whether person could speak English. In 1900, this was the only question; in 1920 and 1930 this question was in addition to request for mother tongue.
- (8) Asked only outside cities.
- (9) On housing portion of questionnaire.
2000 QUESTIONNAIRE

Census 2000 used two questionnaires—a long-form (sample) and a short-form (100 percent) questionnaire. The short-form questionnaire consisted of 7 questions that could be answered by up to 6 persons within a household (see questions 1-6 and 33 on long-form questionnaire reproduced here). Space was provided to identify 6 additional members of the household. The U.S. Census Bureau would collect data on persons 7-12 by telephone interview.

The long-form questionnaire (pictured here), sent to a sample of households throughout the United States and territories, contained 29 inquiries in addition to the 8 questions asked on the short-form questionnaire. These additional questions, as in the past, collected information on the population, housing, economic, and social characteristics of the Nation's households.
Memoranda of Understanding (MOU) Updates: State Administrative Records Data

3-19-2018 Summary

The Census Bureau has contacted every state and several tribal governments seeking administrative records data for the Supplemental Nutritional Assistance Program (SNAP), Women, Infants, and Children (WIC), and Temporary Assistance to Needy Families (TANF), which are federal programs that are administered by the states, as well as other assistance program data the states may be willing to share. These data could potentially support the 2020 Census program, providing additional information to supplement federal administrative records information. A final determination is expected late in 2018 as to the quality and coverage of these data to support the 2020 Census program.

The Census Bureau has received the data for 34 programs administered by the states, and is waiting to receive the data for several more programs.

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<th>Agreement in Draft Review</th>
<th>Agreement Submitted for Signature</th>
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Memoranda of Understanding (MOU) Updates: Citizenship Data

3-19-2018 Summary

The Census Bureau needs to acquire citizenship data from the U.S. Citizenship and Immigration Services (USCIS) and the State Department to augment the information on the “Numident” file from the Social Security Administration (SSA). These data can potentially be used to supplement information provided by respondents on the 2020 Census or, alternatively, to produce block level data on citizenship.

The Census Bureau is currently in discussion with USCIS to obtain data on naturalizations and the State Department to obtain data on visas and passports. USCIS is currently reviewing a draft agreement and has sent over national summary level data for the years 2014-2017 indicating the number of applications (naturalizations) with Social Security Numbers (SSN). The Census Bureau sent a formal request describing its need for the passport and visa data, with the expectation that further discussions will occur once the State Department has reviewed the request.

The Census Bureau’s current agreement with SSA will expire this year, so as part of the renegotiation process the Census Bureau reached out to its partners at SSA to describe the potential use of the Numident, as a primary source of estimates on citizenship for the 2020 Census. SSA is currently reviewing this information.

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<tr>
<td>USCIS</td>
<td>U.S. Citizenship and Immigration Services</td>
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<td></td>
<td>Pending USCIS review of MOU; USCIS provided summary data for number of applications.</td>
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<th>State</th>
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<th>DELIBERATIVE</th>
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<tbody>
<tr>
<td></td>
<td></td>
<td>Sent request letter to Deputy Assistant Secretary for Consular Affairs, explaining need for passport data and completing DoS</td>
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MOU Update
<table>
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<tr>
<th>SSA</th>
<th>Social Security Administration</th>
<th>DELIBERATIVE</th>
<th>questionnaire; awaiting DoS response.</th>
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<tr>
<td></td>
<td></td>
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<td>Pending SSA reaction and response, expected end of next week.</td>
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</table>

MOU Update

-8-Mar-18
§213. False statements, certificates, and information

(a) Whoever, being an officer or employee referred to in subchapter II of chapter 1 of this title, willfully and knowingly swears or affirms falsely as to the truth of any statement required to be made or subscribed by him under oath by or under authority of this title, shall be guilty of perjury, and shall be fined not more than $2,000 or imprisoned not more than five years, or both.

(b) Whoever, being an officer or employee referred to in subchapter II of chapter 1 of this title-
   (1) willfully and knowingly makes a false certificate or fictitious return; or
   (2) knowingly or willfully furnishes or causes to be furnished, or, having been such an officer or employee, knowingly or willfully furnished or caused to be furnished, directly or indirectly, to the Secretary or to any other officer or employee of the Department of Commerce or bureau or agency thereof, any false statement or false information with reference to any inquiry for which he was authorized and required to collect information provided for in this title-

shall be fined not more than $2,000 or imprisoned not more than five years, or both.

(Aug. 31, 1954, ch. 1158, 68 Stat. 1022.)

Historical and Revision Notes


Section consolidates part of section 208 of title 13, U.S.C., 1952 ed., with that part of section 122 of such title which made such section 208 applicable to the quinquennial censuses of manufacturers, the mineral industries, and other businesses (see subchapter I of chapter 5 of this revised title), that part of section 252 of such title which made such section 208 applicable to the quinquennial censuses of governments (see subchapter III of chapter 5 of this revised title), and that part of subsection (b) of section 1442 of title 42, U.S.C., 1952 ed., which made such section 208 applicable to the decennial censuses of housing (see subchapter II of chapter 5 of this revised title). For remainder of sections 122, 208, and 252 of title 13, U.S.C., 1952 ed., and of section 1442 of title 42, U.S.C., 1952 ed. (which section has been transferred in its entirety to this revised title), see Distribution Table.

As set out in this revised section, the provisions relate to all investigations, surveys, collections of statistics, and censuses provided for in this title, and to officers as well as employees, which was probably the original legislative intent.

References to the offenses described in subsection (b) of this revised section as being felonies, were omitted as covered by section 1 of title 18, U.S.C., 1952 ed., Crimes and Criminal Procedure, classifying offenses; and words "upon conviction thereof" and "upon conviction of" were omitted as surplusage.

Changes were made in phraseology and arrangement.
VIA CERTIFIED RETURN RECEIPT
7014 2120 0000 8064 4964

Dr. Ron Jarmin
Performing the Non-Exclusive Functions and Duties of the Director
U.S. Census Bureau
United States Department of Commerce
Washington, D.C. 20233-0001

Re: Request To Reinstate Citizenship Question On 2020 Census Questionnaire

Dear Dr. Jarmin:

The Department of Justice is committed to robust and evenhanded enforcement of the Nation’s civil rights laws and to free and fair elections for all Americans. In furtherance of that commitment, I write on behalf of the Department to formally request that the Census Bureau reinstate on the 2020 Census questionnaire a question regarding citizenship, formerly included in the so-called “long form” census. This data is critical to the Department’s enforcement of Section 2 of the Voting Rights Act and its important protections against racial discrimination in voting. To fully enforce those requirements, the Department needs a reliable calculation of the citizen voting-age population in localities where voting rights violations are alleged or suspected. As demonstrated below, the decennial census questionnaire is the most appropriate vehicle for collecting that data, and reinstating a question on citizenship will best enable the Department to protect all Americans’ voting rights under Section 2.

The Supreme Court has held that Section 2 of the Voting Rights Act prohibits “vote dilution” by state and local jurisdictions engaged in redistricting, which can occur when a racial group is improperly deprived of a single-member district in which it could form a majority. See Thornburg v. Gingles, 478 U.S. 30, 50 (1986). Multiple federal courts of appeals have held that, where citizenship rates are at issue in a vote-dilution case, citizen voting-age population is the proper metric for determining whether a racial group could constitute a majority in a single-member district. See, e.g., Reyes v. City of Farmers Branch, 586 F.3d 1019, 1023–24 (5th Cir. 2009); Barnett v. City of Chicago, 141 F.3d 699, 704 (7th Cir. 1998); Negm v. City of Miami Beach, 113 F.3d 1563, 1567–69 (11th Cir. 1997); Romero v. City of Pomona, 883 F.2d 1418, 1426 (9th Cir. 1989), overruled in part on other grounds by Townsend v. Holman Consulting Corp., 914 F.2d 1136, 1141 (9th Cir. 1990); see also LULAC v. Perry, 548 U.S. 399, 423–442 (2006) (analyzing vote-dilution claim by reference to citizen voting-age population).
The purpose of Section 2's vote-dilution prohibition “is to facilitate participation ... in our political process” by preventing unlawful dilution of the vote on the basis of race. *Campos v. City of Houston*, 113 F.3d 544, 548 (5th Cir. 1997). Importantly, “[t]he plain language of section 2 of the Voting Rights Act makes clear that its protections apply to United States citizens.” *Id.* Indeed, courts have reasoned that “[t]he right to vote is one of the badges of citizenship” and that “[t]he dignity and very concept of citizenship are diluted if noncitizens are allowed to vote.” *Barnett*, 141 F.3d at 704. Thus, it would be the wrong result for a legislature or a court to draw a single-member district in which a numerical racial minority group in a jurisdiction was a majority of the total voting-age population in that district but “continued to be defeated at the polls” because it was not a majority of the citizen voting-age population. *Campos*, 113 F.3d at 548.

These cases make clear that, in order to assess and enforce compliance with Section 2’s protection against discrimination in voting, the Department needs to be able to obtain citizen voting-age population data for census blocks, block groups, counties, towns, and other locations where potential Section 2 violations are alleged or suspected. From 1970 to 2000, the Census Bureau included a citizenship question on the so-called “long form” questionnaire that it sent to approximately one in every six households during each decennial census. See, e.g., U.S. Census Bureau, *Summary File 3: 2000 Census of Population & Housing—Appendix B at B-7 (July 2007)*, available at https://www.census.gov/prod/cen2000/doc/sf3.pdf (last visited Nov. 22, 2017); U.S. Census Bureau, *Index of Questions*, available at https://www.census.gov/history/www/through_the_decades/index_of_questions/ (last visited Nov. 22, 2017). For years, the Department used the data collected in response to that question in assessing compliance with Section 2 and in litigation to enforce Section 2’s protections against racial discrimination in voting.

In the 2010 Census, however, no census questionnaire included a question regarding citizenship. Rather, following the 2000 Census, the Census Bureau discontinued the “long form” questionnaire and replaced it with the American Community Survey (ACS). The ACS is a sampling survey that is sent to only around one in every thirty-eight households each year and asks a variety of questions regarding demographic information, including citizenship. See U.S. Census Bureau, *American Community Survey Information Guide at 6*, available at https://www.census.gov/content/dam/Census/programs-surveys/acs/about/ACS Information Guide.pdf (last visited Nov. 22, 2017). The ACS is currently the Census Bureau’s only survey that collects information regarding citizenship and estimates citizen voting-age population.

The 2010 redistricting cycle was the first cycle in which the ACS estimates provided the Census Bureau’s only citizen voting-age population data. The Department and state and local jurisdictions therefore have used those ACS estimates for this redistricting cycle. The ACS, however, does not yield the ideal data for such purposes for several reasons:

- Jurisdictions conducting redistricting, and the Department in enforcing Section 2, already use the total population data from the census to determine compliance with the Constitution’s one-person, one-vote requirement, see *Evenwel v. Abbott*, 136 S. Ct. 1120 (Apr. 4, 2016). As a result, using the ACS citizenship estimates means relying on two different data sets, the scope and level of detail of which vary quite significantly.

2
Because the ACS estimates are rolling and aggregated into one-year, three-year, and five-year estimates, they do not align in time with the decennial census data. Citizenship data from the decennial census, by contrast, would align in time with the total and voting-age population data from the census that jurisdictions already use in redistricting.

The ACS estimates are reported at a ninety percent confidence level, and the margin of error increases as the sample size—and, thus, the geographic area—decreases. See U.S. Census Bureau, Glossary: Confidence interval (American Community Survey), available at https://www.census.gov/glossary/#term_CertaintyintervalAmericanCommunitySurvey (last visited November 22, 2017). By contrast, decennial census data is a full count of the population.

Census data is reported to the census block level, while the smallest unit reported in the ACS estimates is the census block group. See American Community Survey Data 3, 5, 10. Accordingly, redistricting jurisdictions and the Department are required to perform further estimates and to interject further uncertainty in order to approximate citizen voting-age population at the level of a census block, which is the fundamental building block of a redistricting plan. Having all of the relevant population and citizenship data available in one data set at the census block level would greatly assist the redistricting process.

For all of these reasons, the Department believes that decennial census questionnaire data regarding citizenship, if available, would be more appropriate for use in redistricting and in Section 2 litigation than the ACS citizenship estimates.

Accordingly, the Department formally requests that the Census Bureau reinstate into the 2020 Census a question regarding citizenship. We also request that the Census Bureau release this new data regarding citizenship at the same time as it releases the other redistricting data, by April 1 following the 2020 Census. At the same time, the Department requests that the Bureau also maintain the citizenship question on the ACS, since such question is necessary, inter alia, to yield information for the periodic determinations made by the Bureau under Section 203 of the Voting Rights Act, 52 U.S.C. § 10503.

Please let me know if you have any questions about this letter or wish to discuss this request. I can be reached at (202) 514-3452, or at Arthur.Gary@usdoj.gov.

Sincerely yours,

[Signature]

Arthur E. Gary
General Counsel
Justice Management Division
<table>
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<th>News Date</th>
<th>News Headline</th>
<th>Outlet Name</th>
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<td>2/13/2018</td>
<td>Asking about citizenship in the 2020 census is &quot;unconstitutional,&quot; according to 19 Democrats</td>
<td>Newsweek Online</td>
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<td>2/1/2018</td>
<td>2020 Census will ask white people about origins but leave out questions about Hispanic and Middle Eastern identities</td>
<td>Newsweek Online</td>
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<tr>
<td>1/25/2018</td>
<td>How a citizenship question on the 2020 Census could diminish Miami’s political clout</td>
<td>Miami Herald Online, The</td>
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<tr>
<td>1/25/2018</td>
<td>Potential citizenship question in census could shift power; GOP likely would gain; Democrats doubt accuracy</td>
<td>Houston Chronicle</td>
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<td>1/21/2018</td>
<td>Census 2020: High stakes for Illinois</td>
<td>Chicago Tribune</td>
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<td>1/15/2018</td>
<td>The Census Should Ask About Citizenship</td>
<td>Wall Street Journal Online, The</td>
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<tr>
<td>1/9/2018</td>
<td>Census doesn’t need citizenship question</td>
<td>USA Today</td>
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<td>1/8/2018</td>
<td>Census 2020 doesn't need citizenship question</td>
<td>USA Today Online</td>
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<td>1/4/2018</td>
<td>Don’t imperil the U.S. census</td>
<td>Los Angeles Times</td>
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<td>12/30/2017</td>
<td>This month, the Department of Justice requested to include a citizenship question on the 2020 Census</td>
<td>Newsweek Online</td>
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<td>3/20/2018</td>
<td>Trump’s reelection campaign calls for adding citizenship question to 2020 census amid criticism that he is politicizing the count</td>
<td>Washington Post Online, The</td>
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<td>2/16/2018</td>
<td>Citizenship Question Would Convert Census Into a GOP Voter Suppression Tool</td>
<td>Daily Beast, The</td>
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<td>2/5/2018</td>
<td>Groups raise concerns about move to ask about citizenship on the Census</td>
<td>USA Today Online</td>
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<td>1/29/2018</td>
<td>Census Change to Race, Ethnicity Questions Shelved by Trump Administration Delay</td>
<td>Wall Street Journal Online, The</td>
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<td>1/19/2018</td>
<td>High stakes for Illinois</td>
<td>Chicago Tribune Online</td>
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<td>1/11/2018</td>
<td>Why the census shouldn't try to count undocumented immigrants</td>
<td>Los Angeles Times Online</td>
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<td>1/10/2018</td>
<td>Groups oppose potential question on citizenship in next census</td>
<td>Houston Chronicle Online/chron.com</td>
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<td>1/9/2018</td>
<td>Hostility to this Census question is overblown</td>
<td>USA Today</td>
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<td>1/8/2018</td>
<td>Hostility to Census question is overblown</td>
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<td>1/5/2018</td>
<td>The GOP sabotage of the census</td>
<td>Washington Post, The</td>
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<td>1/3/2018</td>
<td>The wrong question to ask</td>
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<td>1/2/2018</td>
<td>The question that could sabotage the census</td>
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<td>3/18/2018</td>
<td>Eyewitness Newsmakers</td>
<td>KABC-TV</td>
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<td>3/15/2018</td>
<td>Fearing a Trump population undercount, Brown wants more money for state census effort</td>
<td>Sacramento Bee Online, The</td>
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<td>3/11/2018</td>
<td>No citizen question on the census</td>
<td>San Antonio Express-News Online</td>
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<td>3/6/2018</td>
<td>Census respondents may be asked citizenship status in 2020 survey</td>
<td>FOX News Channel Online</td>
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<td>3/5/2018</td>
<td>We can't count on the Census Bureau</td>
<td>New York Daily News Online</td>
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<td>3/4/2018</td>
<td>Rural Deep South at most risk of being overlooked in 2020 census</td>
<td>Richmond Times-Dispatch</td>
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<td>2/19/2018</td>
<td>States oppose census citizenship query</td>
<td>San Diego Union-Tribune, The</td>
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<td>All Mississippi residents need to be counted in census</td>
<td>Clarion-Ledger Online, The</td>
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<td>2/18/2018</td>
<td>Census count vital to state</td>
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<td>2/18/2018</td>
<td>Will the 2020 Census find you?</td>
<td>Los Angeles Daily News</td>
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<td>2/17/2018</td>
<td>Why citizenship could be a question on the 2020 Census</td>
<td>Orange County Register Online, The</td>
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<td>Public-health officials pan Justice Dept. bid to add citizenship question to census</td>
<td>Seattle Times Online, The</td>
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<td>2/13/2018</td>
<td>Citizenship question on 2020 Census jeopardizes Florida's political clout</td>
<td>Orlando Sentinel Online</td>
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<td>N.J. flags Census citizen question More than a dozen states object to proposal, fearing immigrants won't respond</td>
<td>Star-Ledger, The</td>
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<td>Dem AGs press Trump officials not to include citizenship question in census</td>
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<td>2/8/2018</td>
<td>Mayors to Census: Don't Blow This</td>
<td>CityLab</td>
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<td>2/6/2018</td>
<td>Citizenship question drives uncertainty over 2020 census</td>
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<td>1/30/2018</td>
<td>California must stop Trump from sabotaging the census</td>
<td>Mercury News Online, The</td>
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<td>Opinion: California must stop Trump from sabotaging the census</td>
<td>Mercury News, The</td>
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<td>1/26/2018</td>
<td>Commentary: A flawed Census could hurt Utah's rural areas and marginalized communities</td>
<td>Salt Lake Tribune Online</td>
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<td>1/26/2018</td>
<td>Why 2020 Census should not ask about citizenship</td>
<td>Mercury News Online, The</td>
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<td>1/26/2018</td>
<td>Commentary A flawed Census could hurt Utah's rural areas and marginalized communities</td>
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<td>Legislation Tries to Block Census from Adding Citizenship Question as DOJ Requested</td>
<td>Pajamas Media</td>
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<td>Trump administration's census citizenship question could help rig redistricting for Republicans</td>
<td>Daily Kos</td>
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<td>Trump officials want 2020 census to ask about citizenship</td>
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<td>Trump Administration's Push For Citizenship Question On Census Alarms Critics</td>
<td>KUHF-FM - Online</td>
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<td>1/9/2018</td>
<td>Census 2020 doesn't need citizenship question</td>
<td>Commercial Appeal Online</td>
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<td>News Journal Online, The</td>
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<td>Cincinnati Enquirer Online, The</td>
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<td>GOP Weaponizing the Census for Voter Suppression</td>
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<td>Congress must guard accuracy of census</td>
<td>Star Tribune</td>
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<td>1/7/2018</td>
<td>GOP sabotaging census</td>
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<td>1/5/2018</td>
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<td>EDITORIAL: Quick way to undermine the U.S. Census? Ask about citizenship</td>
<td>Chicago Sun-Times</td>
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<tr>
<td>1/3/2018</td>
<td>Should 2020 census ask Californians about their citizenship?</td>
<td>San Diego Union-Tribune Online</td>
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<td>12/31/2017</td>
<td>Trump Justice Department Pushes For Citizenship Question On Census, Alarming Experts</td>
<td>National Memo</td>
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<td>Trump Justice Department Pushes for Citizenship Question on Census, Alarming Experts</td>
<td>HuffPost</td>
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<td>3/22/2018</td>
<td>Immigrants hiding from Trump imperil accuracy of US Census</td>
<td>Miami Herald Online, The</td>
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<td>President Trump is sabotaging census, CA elections chief says</td>
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<td>Not because of cavalier threats about nuclear apocalypse and attempted erosion of First Amendment rights (OK, maybe those things, too). Because our federal government is failing to execute one of its most basic constitutional duties: the decennial census.</td>
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<td>DOJ calling for citizenship question to be put in 2020 Census: Report</td>
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<td>Adding citizenship question to 2020 Census is untimely, unnecessary and unwise</td>
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<td>Daily Lobo, University of New Mexico</td>
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<td>L.A. City Council Committee Opposes Including Citizenship Question On 2020 Census</td>
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<td>Mayors alarmed by 'unprecedented challenges' ahead of 2020 census</td>
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<td>Galvin worried Trump is ‘sabotaging' 2020 census</td>
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<td>Census Bureau to keep guidelines on race/ethnicity from 2010</td>
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<td>Trump Administration Census Changes Endanger Accurate View of US Diversity</td>
<td>Nonprofit Quarterly, The - Online</td>
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<td>Justice Department Asks Census Bureau to Include Question About Citizenship; Critics Say it Will Undermine Accurate Count</td>
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<td><a href="http://www.qgazette.com">www.qgazette.com</a></td>
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<td>Trump's 2020 Census May Cost California Congressional Seat by Counting Citizens</td>
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<td>2020 vision: California Democrats fire back at DOJ proposal to ask about citizenship on census</td>
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<td>Citizenship question could cloud census; Former officials, civil rights advocates fear query will threaten accurate count in 2020</td>
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# Census Media Tracking on Requested Citizenship Question

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<td>Los Angeles City Council Opposed Proposal to Include Citizenship on 2020 Census</td>
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<td>Trump is ending protections for immigrants from El Salvador. Here's what that means for Houston</td>
<td>Houston Chronicle Online/chron.com</td>
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<td>Rapid City Journal Online</td>
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<td>Justice Dep't pushes for citizenship question on census, alarming experts</td>
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<td>Another way Illinois could lose two congressional districts</td>
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<td>In Mideast, democracy struggles to strike root</td>
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<td>Immigrants Hiding From Trump Imperil Accuracy of U.S. Census</td>
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<td>Concerns over citizenship question of 2020 U.S. Census Survey</td>
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<td>Puerto Rico's exodus growing as island struggles to rebound</td>
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<td>KTVU Mornings on 2 at 6am</td>
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<td>Morning Bits: Lawless Trump administration thinks voters don't care</td>
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<td>3/5/2018</td>
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<td>Immigrant advocates fight to keep off citizenship status question off 2020 census ballot</td>
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<td>Meet The 'Experts' Kobach Is Using To Defend His Voter Fraud Claims In Court</td>
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<td>The three (obscure) things that could transform American politics</td>
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<td>The Teen-Led Fight For Gun Reform</td>
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<td>Myths about chain migration</td>
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<td>'Chain migration'</td>
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<td>The Progressive Happy Hour: The Census is a Civil Rights Issue</td>
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<td>Fox 26 News at 9</td>
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<td>Democrats' 'Dirty Little Secret' Is Excluding Citizenship Question on U.S. Census</td>
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<td>County Files Request To Find Out If 2020 Census Will Ask About Citizenship</td>
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<td>Schatz's ignorance of our Anglo-Saxon legal heritage illustrates problem with government</td>
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<td>Body-in-van case highlights longstanding issues of Hispanic crime victims, Memphis police</td>
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<td>Immigration debate shunned nearly 100 proposals</td>
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<td>Body in van prompts activist complaints</td>
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<td>Trump immigration plan could keep whites in US majority for up to five more years</td>
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<td>Strong majority support a path to citizenship for undocumented immigrants</td>
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<td>America of tomorrow will be ‘none of the above’</td>
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<td>California will soon make voting easier. Here’s how</td>
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<td>By Gregory Wallace[CR-LF]WASHINGTON (CNN) -- The Trump administration on Friday announced that a request to add a controversial question on citizenship status to the 2020 Census is under legal review</td>
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<td>Diane Thompson, Jim Thornton, and Chris</td>
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<td>2/11/2018</td>
<td>Sam Ross Jr.</td>
<td>Korea not the only Olympic divide</td>
<td>Tribune-Democrat Online, The</td>
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<tr>
<td>2/10/2018</td>
<td>Why do Republicans assume immigrants will vote Democratic?</td>
<td>Roanoke Times Online, The</td>
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## Census Media Tracking on Requested Citizenship Question
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<tr>
<td>2/10/2018</td>
<td>At a glance[CR-LF][CR-LF]With immigrants, Galvin said, the greatest challenge is often making sure that people who have citizenship in another country know that they should participate in the U.S. Census.[CR-LF][CR-LF]“Given the rhetoric of the Trump admini</td>
<td>Telegram &amp; Gazette</td>
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<td>2/10/2018</td>
<td>The Republicans of 2044</td>
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<td>2/9/2018</td>
<td>Massachusetts official warns of possible census undercount</td>
<td>Ojornal</td>
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<td>Channel 5 News This Morning at 6am</td>
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<td>2/7/2018</td>
<td>I am young, Black and undocumented in Trump's America</td>
<td>TheGrio.com</td>
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<td>Mucho más que un sueño (Much more than a dream)</td>
<td>Standard-Examiner Online</td>
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<td>White Americans: Where do you really come from?</td>
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<td>Fallacy to block immigration</td>
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<td>Don't mix immigration with the 2020 census</td>
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<td>Arab Americans undeterred despite failure to get MENA category on 2020 Census</td>
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<td>Make DACA the example</td>
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<td>National Association of Latino Elected and Appointed Officials</td>
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<td>America Must be “Cleansed” of its “White Male Privilege”</td>
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<td>Los Angeles Times Editorial: This isn't an immigration plan, it's a ransom note</td>
<td>Press Democrat Online, The</td>
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<td>Jeff Sessions Is Just Getting Started: 7 Things You May've Missed Over the Holidays</td>
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<td>Citizenship question would hurt results, critics caution</td>
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<td>The BRAD BLOG : LIVE BLOGGING: BRAD BLOG Covers CSPAN Coverage of Baker/Carter Election Reform Commission Hearing...</td>
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<td>California Dems fear state losing congressional seat if Census counts only Americans - Liberty Unyielding</td>
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<td>Trump's vision for border wall has evolved in some ways, but not others</td>
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<td>Miami’s Haitians, Used to Being Shunned, Rally After Trump Slight :: WRAL.com</td>
<td>WRAL-TV Online</td>
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<td>Trump's vision for border wall has evolved in some ways, but not others</td>
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<td>AHA asks members to &quot;Help Protect the Census&quot;</td>
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<td>Sean Hannity</td>
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<td>The Schnitt Show</td>
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<td>the Census -- HILLARY ALUM jumps into state treasurer's race -- White House SCOTUS push to dismantle DACA -- Shutdown looms, DREAMers deal?</td>
<td>POLITICO Online</td>
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<td>Californian Democrats Are Worried About Trump's Revised US Census</td>
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<td>1/14/2018</td>
<td>Step up and do right by us</td>
<td>Bakersfield Californian Online</td>
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<td>Adding Citizenship Question Risks 'Bad Count' For 2020 Census, Experts Warn</td>
<td>KVCR-FM Online - KVCR-FM</td>
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<td>Adding Citizenship Question Risks 'Bad Count' For 2020 Census, Experts Warn</td>
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<td>California Secretary of State Alex Padilla Releases Statement in Opposition to Adding Citizenship Question to U.S. Census</td>
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<td>The GOP is sabotaging this sacred mandate</td>
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<td>California Secretary of State in opposition to U.S. Census citizenship question</td>
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<td>Trump's Latest Immigration Move Could Affect Thousands of Salvadoran Students</td>
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<td>AFTER THE STROM: Puerto Rico was home to widespread poverty and on the verge of bankruptcy. And that was before Hurricane Maria.</td>
<td>America</td>
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<td>Not because of cavalier threats about nuclear apocalypse and attempted erosion of First Amendment rights (okay, maybe those things, too). Because our federal government is failing to execute one of its most basic constitutional duties: the decennial census</td>
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<td>Trump Kills Incompetent 'Election Integrity' Commission, But His Voter Fraud Conspiracy Theory Lives On</td>
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<td>Aging undocumented immigrants pose costly health care challenge</td>
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<td>Profile America: New Year's Day in History - The Bronx Chronicle</td>
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<td>12/31/2017</td>
<td>Trump DOJ proposes adding citizenship question to Census; 'experts alarmed' - Liberty Unyielding</td>
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<td>12/30/2017</td>
<td>DOJ Trying to Add Citizenship Question to Census: Report</td>
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<td>Terrible Idea: U.S. Justice Dept. Proposing That Questions About Immigration Status Be Included In Census</td>
<td>Larry Ferlazzo's Websites of the Day...</td>
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<td>President Shirley M. Collado Co-Edits Book on Latinx Students and Professionals in Higher Ed - IC News</td>
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<td>Everything you need to know about DACA in three minutes</td>
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<td>3/23/2018</td>
<td>We are not a 'nation of immigrants'</td>
<td>Central Maine Today Media</td>
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<td>Senadores demócratas presentan medida para prohibir pregunta sobre ciudadanía en Censo</td>
<td>La Opinión de la Bahía Online</td>
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<td>3/22/2018</td>
<td>10 Must Reads for the CRE Industry Today (March 22, 2018)</td>
<td>National Real Estate Investor Online</td>
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<td>3/21/2018</td>
<td>Civics project may be required</td>
<td>Salem News Online</td>
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<td>'We are the forgotten people': It's been almost six months since Hurricane Maria, and Puerto Ricans are still dying</td>
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<td>So many want to vote in Mexico's presidential election that the Dallas consulate can't handle them all</td>
<td>Dallas Morning News Online</td>
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<td>This Week in Poverty: Chairman Ryan and the Real World</td>
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<td>(Most) Silver town councilors welcome signs</td>
<td>Silver City Daily Press &amp; Independent</td>
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<td>Trump owns up to making things up - - WOW!</td>
<td>Wow Way!</td>
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<td>Attorney General Hunter Sends Letter to US Commerce Secretary Ross, Requesting ...</td>
<td><a href="https://www.google.com/">https://www.google.com/</a></td>
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<td>Trump Admits to Making Things Up in Speech to Donors</td>
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<td>Trump owns up to making things upTrump owns up to making things up Top VideoMore &gt;&gt; Most Popular Trump owns up to making things up Top VideoMore &gt;&gt; Most Popular HeadlinesMore &gt;&gt;</td>
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<td>Kion 5/46 News Channel</td>
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<td>It's been almost six months since Hurricane Maria, and Puerto Ricans are still dying</td>
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<td>3/16/2018</td>
<td>Trump owns up to making things up during meeting with Canadian PM</td>
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<td>Story by John D. Sutter, CNNVideo by Leyla Santiago and Khushbu Shah, CNNPhotographs by Erika P</td>
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<td>Peter Kirsanow, US Commission on Civil Rights member, asks about citizenship on census forms</td>
<td><a href="https://www.google.com/">https://www.google.com/</a></td>
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<td>America's census must drop the citizenship question</td>
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<td>3/15/2018</td>
<td>Gay German diplomat settles into SF</td>
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<td>Federal trial continues on Kansas restrictions on voter registration</td>
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<td>Non-citizen voters discovered in Chicago suburb</td>
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<td>Yes, manufacturing still provides a pay advantage, but staffing firm outsourcing is eroding it</td>
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<td>California Has Lessons for Integrating Immigrants, but Will the Feds Undercut Them?</td>
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<td>10 policy issues to watch in omnibus spending bill - Personal Liberty®</td>
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<td>Proposed citizenship question on census raises concern among immigrant advocates</td>
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## Census Media Tracking on Requested Citizenship Question

**January 29, 2017 to March 23, 2018**

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<td>CHN: Select Departmental FY19 Budget Requests</td>
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<td>Scandal and Tragedy: Look At News Daily (Feb. 10-16 /Day 22-27) Week 4</td>
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<td>Why won't media cover these Trump successes?</td>
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<td>Census 'citizenship' question sets off new California vs. Trump immigration argument</td>
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<td>Undercompensation is likely a factor in Pennsylvania's growing teacher shortage</td>
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<td>Debate heats up about citizenship question in next Census</td>
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<td>High-skilled Indian Workers Rally For Trump's Merit-based Immigration Plan</td>
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<td>Trump Puts New Twist on Visa Misinformation</td>
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<td>Report: Texans lag in political participation</td>
<td>San Marcos Daily Record Online</td>
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<td>SENATE INDIAN AFFAIRS, HEARING ON NATIVE AMERICANS AND THE 2020 CENSUS</td>
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<td>Reviving a civic group</td>
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<td>Chloe, a therapy dog at Beverly Hospital, does tricks before visiting patients</td>
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<td>State report: Minnesota needs immigrants to fill jobs and maintain economic growth</td>
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<td>AG Madigan, coalition oppose citizenship question on 2020 census</td>
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<td>AG Becerra to Trump Administration: Citizenship Question On 2020 Census Would Be Unconstitutional</td>
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<td>Immigration plan could keep whites in U.S. a majority for 5 more years</td>
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<td>Timeline of Trump administration's civil and human rights rollbacks</td>
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<td>Immigration backlash is coming from places least touched by immigration</td>
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## Census Media Tracking on Requested Citizenship Question
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<td>Furor greets request to add citizenship question to 2020 US census</td>
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<td>2017: Last Year's Reading - doonesyscafe.com</td>
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<td>Saving the Associate of Arts Degree: HOW AN A.A. DEGREE CAN BECOME A BETTER PATH TO LABOR MARKET SUCCESS.(Essay)</td>
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<td>Efforts grow to help students evaluate what they see online</td>
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<td>Spread of fake news prompts literacy efforts in schools</td>
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<td>12/30/2017</td>
<td>DOJ wants 2020 census to ask about citizenship status</td>
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<td>Census Bureau called to add citizenship question on forms</td>
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<td>12/29/2017</td>
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<td>Latino clout in election uncertain; Higher turnout might not guarantee gains for Dems</td>
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## Census Media Tracking on Requested Citizenship Question
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**KEY**

**Media impact score is calculated by multiplying the prominence score of an article by the importance of the publication.**

Prominence score analyses the text of a news article based on unique search terms to score each article.

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The importance of a media outlet is determined by a tier level assigned by their circulation.

- Tier 1, Multiplier=4
- Tier 2, Multiplier=3
- Tier 3, Multiplier=2
- Tier 4, Multiplier=1

The media impact score ranges from a high of 200 to a low of 0.
WASHINGTON, Oct. 16, 2017 /PRNewswire-USNewswire/ -- A new analysis by the Center for Immigration Studies of recently released U.S. Census data finds that the nation's immigrant population (legal and illegal) hit a record 43.7 million in 2016. The data also show more than 16.6 million U.S.-born minor children with an immigrant parent. Immigrants and their young children thus now account for nearly one in five U.S. residents.
Growth in the immigrant population was not the same for all countries. There were significant increases in the total number of immigrants from the Middle East, Asia, Sub-Saharan Africa, and Latin American countries other than Mexico, while the number of those from Mexico, Europe, and Canada grew not at all or declined. The sending countries with the highest percentage growth from 2010 to 2016 were Saudi Arabia (up 122 percent), Nepal (up 86 percent), Afghanistan (up 74 percent), Burma (up 73 percent), and Syria (up 62 percent).

The states experiencing the largest percentage increases in the number of immigrants 2010 to 2016 were North Dakota (up 48 percent), West Virginia (up 41 percent), South Dakota (up 39 percent), Delaware (up 24 percent), Nebraska (up 20 percent), and Minnesota (up 20 percent).

Dr. Steven Camarota, the Center’s director of research and co-author of the report, said, "The enormous number of immigrants already in the country coupled with the settlement of well over a million newcomers each year has a profound impact on American society, including on workers, schools, infrastructure, hospitals and the environment. The nation needs a serious debate about whether continuing this level of immigration makes sense."


Among the findings in the new data:
• The nation’s immigrant population (legal and illegal) hit a record 43.7 million in July 2016, an increase of half a million since 2015, 3.8 million since 2010, and 12.6 million since 2000.

• As a share of the U.S. population, immigrants (legal and illegal) comprised 13.5 percent, or one out of eight U.S. residents in 2016, the highest percentage in 106 years. As recently as 1980, just one out of 16 residents was foreign-born.

• Between 2010 and 2016, 8.1 million new immigrants settled in the United States. New arrivals are offset by the roughly 300,000 immigrants who return home each year and annual natural mortality of about 300,000 among the existing foreign-born population. As a result, growth in the immigrant population was 3.8 million 2010 to 2016.

• In addition to immigrants, there were slightly more than 16.6 million U.S.-born minor children with an immigrant parent in 2016, for a total of 60.4 million immigrants and their children in the country. Immigrants and their minor children now account for nearly one in five U.S. residents.

• Mexican immigrants (legal and illegal) were by far the largest foreign-born population in the country in 2016. Mexico is the top sending country, with 1.1 million new immigrants arriving from Mexico between 2010 and 2016, or one out of eight new arrivals. However, because of return migration and natural mortality, the overall Mexican-born population has not grown in the last six years.

• The sending regions with the largest numerical increases in the number of immigrants living in the United States 2015 to 2016 were the Caribbean (up 120,522), the Middle East (up 109,113), Central America (up 70,664), Sub-Saharan Africa (up 67,198), South Asia (up 64,902), and South America (up 61,462).

• Longer term, the regions with the largest numerical increases 2010 to 2016 were East Asia (up 892,209), South Asia (up 889,878), the Caribbean (up 554,903), the Middle East (up 471,029), Sub-Saharan Africa (up 456,989), Central America (up 402,754), and South America (up 249,660).

• The sending countries with the largest numerical increases since 2010 were India (up 654,202), China (up 550,022), the Dominican Republic (up 206,134), El Salvador (up 172,973), Cuba (up 166,939), the Philippines (up 164,077), Honduras (up 128,478), Vietnam (up 112,218), Venezuela (up 106,185), Guatemala (up 104,883), Nigeria (up 87,565), Pakistan (up 83,271), Haiti (up 81,074), Bangladesh (up 80,949), Jamaica (up
76,532), Ethiopia (up 71,332), Brazil (up 69,982), Colombia (up 68,032), Iraq (up 61,787), Burma (also known as Myanmar, up 60,294), Nepal (up 59,992), and Saudi Arabia (up 54,833).

- The sending countries with the largest percentage increases in the number of immigrants living in the United States since 2010 were Saudi Arabia (up 122 percent), Nepal (86 percent), Afghanistan (up 74 percent), Burma (up 73 percent), Syria (up 62 percent), Venezuela (up 58 percent), Bangladesh (up 53 percent), Kenya (up 46 percent), Ethiopia (up 41 percent), Nigeria (up 40 percent), Iraq (up 39 percent), Ghana (up 37 percent), India (up 37 percent), Egypt (up 32 percent), Pakistan (up 28 percent), and China (up 25 percent).

- The states with the largest numerical increases in the number of immigrants from 2010 to 2016 were Texas (up 587,889), Florida (up 578,468), California (up 527,234), New York (up 238,503), New Jersey (up 171,504), Massachusetts (up 140,318), Washington (up 134,132), Pennsylvania (up 131,845), Virginia (up 120,050), Maryland (up 118,175), Georgia (up 95,353), Nevada (up 78,341), Arizona (up 78,220), Michigan (up 74,532), Minnesota (up 73,953), and North Carolina (up 70,501).

- The states with the largest percentage increases in the number of immigrants 2010 to 2016 were North Dakota (up 48 percent), West Virginia (up 41 percent), South Dakota (up 39 percent), Delaware (up 24 percent), Nebraska (up 20 percent), Minnesota (up 20 percent), Wyoming (up 19 percent), Pennsylvania (up 18 percent), Alaska (up 16 percent), Indiana (up 16 percent), Florida (up 16 percent), Nevada (up 15 percent), Washington (up 15 percent), Iowa (up 15 percent), Maryland (up 15 percent), Massachusetts (up 14 percent), Texas (up 14 percent), Utah (up 13 percent), Wisconsin (up 13 percent), and Virginia (up 13 percent).

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SOURCE Center for Immigration Studies

Responsive Philanthropy

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Philanthropy and the 2020 census:
A once-in-a-decade chance to get it right
By Vanita Gupta

The U.S. Constitution requires a census every 10 years, and getting it right is important to everyone. The census has an enormous impact on the nation’s ability to ensure that all Americans receive equal treatment under the law and have equal access to economic opportunities. Census data provide the basis for virtually all demographic and socioeconomic information used by policymakers at all levels of government, businesses, philanthropy, community leaders and research organizations.

A good census is not a partisan issue. The goal of the U.S. Census Bureau is to “count everyone once, only once, and in the right place.” But the census doesn’t count all groups equally well, which skews the results in favor of some communities over others for the next 10 years. Already, budget shortfalls are placing census operations designed to reach groups that have been historically underrepresented in the census at risk, threatening fairness and accuracy, and ultimately, our democracy.

The U.S. Census Bureau spends billions of dollars on the census. However, none of that money reaches the nonprofit organizations whose outreach to people of color, immigrants and people with low income can help make the difference between a disastrous undercount and an accurate count.

IT’S NOW OR NEVER
Some of the largest foundations in the country have started to fill a portion of this resource gap, but more focus and resources are needed to support the organizations engaged in critical census education and promotion.

Here are four reasons why funders need to (continued on page 12)
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(continued from page 1).

cant harm for years to come. The Census Bureau has spent an entire decade planning for the upcoming census, and, by the end of 2017, the Census Bureau will have finalized the questionnaire for 2020 and launched its program for sharing preliminary address lists with states and municipalities.

Significant operations will go into effect in 2018 with the End-to-End Census Test. This pivotal “dress rehearsal” had been scheduled to take place in three areas—Pierce County, Washington; Providence County, Rhode Island; and Bluefield-Beckley-Oak Hill, West Virginia—but due to budget shortfalls, it will only be conducted in Providence. The dry run is the only opportunity for a complete test of the 2020 questionnaire and new technologies, including a new Internet response option that the Census Bureau is promoting as the primary response mode for the 2020 census and electronic devices for census takers to collect information during personal visits to unresponsive households.

In 2019, the Census Bureau will ramp up its outreach efforts, which include a partnership program, paid advertising, and a census in the schools program. Hundreds of millions of questionnaires will be printed, and local offices across the country will begin recruiting more than a million temporary census employees, with plans to hire about 300,000 enumerators during peak operations. Census workers also will canvass selected communities that have undergone significant change or that have unstable housing conditions, to update the master address file that establishes the universe for the 2020 count.

3. ENGAGING LATER MAY BE TOO LATE.

Historically, the census has missed disproportionately high numbers of people of color, low-income households in rural and urban areas and young children. The Census Bureau also designates “hard-to-count” areas based on additional characteristics, including limited English proficiency, mobile and single-parent households. This uneven accuracy has significant civil rights implications because it could deny the most vulnerable members of our society equal representation and opportunity. Efforts to address these challenges must be built into the census process now, before it is too late for them to have an impact.

Encouraging people to complete their census questionnaires, and eliminating undercounts in at-risk communities, will be particularly challenging in 2020. Encouraging an online response might lead to concerns about Internet privacy and data confidentiality, especially given high-profile news stories about computer hacking affecting businesses and government. And some communities that may already feel besieged by the current political climate may be concerned about new options for identifying Middle Eastern and North African ethnicity. Immigrant and mixed-status households may be especially fearful of providing information to the federal government in 2020, given the heightened climate of fear that anti-immigrant rhetoric and policies have created.

The Census Bureau will attempt to minimize undercounting with an extensive, $400+ million communications plan, but the bureau cannot be successful on its own. The role that national and state advocacy groups and community-based organizations play is critical to a fair and accurate census.

According to former Census Bureau Director Kenneth Prewitt, “Of the many things necessary for a successful census, none rival ‘trusted voices’ that reassure Americans anxious about the government asking questions. The Census Bureau knows that trusted community voices persuade millions of Americans to join the once every decade opportu-
nity that is truly ‘of the people, by the people, for the people.’”

We commend the philanthropic community for identifying an accurate 2010 census as an important goal and for committing significant resources to this work—The Leadership Conference’s 2010 census education and promotion campaign, a collaborative with Asian Americans Advancing Justice-AAJC, the National Association of Latino Elected and Appointed Officials Educational Fund; the NAACP, and the National Congress of American Indians, which served as a key bridge between the Census Bureau and communities at greatest risk of an undercount—which would not have been possible without this support.

Foundations invested at least $37 million in “get out the count” campaigns to increase the accuracy of the 2010 census. But the flow of funds to nonprofit organizations was uneven and unpredictable, and the levels of funding were not commensurate with the importance of the census and the wide-ranging and long-term consequences of underperformance.

Equally important is to consider that meaningful funder involvement did not begin until 2008, which was not early enough in the decade during the last census cycle.

Our work for the 2020 census has been under way for years, and some of the nation’s largest foundations have begun to shore up funding to support nonprofit communities. But the resources and reach to date are inadequate to meet the immense challenge of ensuring a fair and accurate count.

In the current climate, broadening the coalition engaged in census work will be critical. Foundations that understand the importance of the census for their other substantive areas of focus must find ways of ensuring a swift and sufficient investment in the work of community groups.

4. FOCUSING ON POLICY IMPROVEMENTS NOW COULD PAY SIGNIFICANT DIVIDENDS.

The 2020 census faces a severe threat that underfunding will compromise its fairness and accuracy. In order for the Census Bureau to prepare well—and carry out important tests of new technologies and procedures—it requires a continuous ramp up in funding levels in the years ending in “6” through “0.”

Unfortunately, as the below graph shows, for this cycle Congress allocated far less than the Census Bureau requested in both 2016 and 2017; the 2017 funding level was only modestly higher than the previous year. To make matters worse, the administration’s funding request of $1.5 billion for fiscal year 2018 is irresponsible and unrealistically low, falling at least $300 million short of the level needed to ensure a cost-effective decennial census in 2020.

This underinvestment has already forced the Census Bureau to scale back or eliminate some key 2020 census preparations. For example, 2017 field tests planned for Puerto Rico and on two American-Indian reservations were canceled. In addition, the opening of three of six regional 2020 census offices has been delayed, and the communications campaign and coverage measurement components of the 2018 dress rehearsal were eliminated.

Given the Trump Administration’s inadequate budget request for 2018, the Census Bureau has been forced to entirely eliminate two of the three dress rehearsal sites, thus diminishing the opportunity to fully test all methods and operations in a census-like environment in different types of communities.

The consequences of inadequate preparation and funding could be devastating, with vulnerable, hard-to-count communities taking the hardest hits. Educational outreach, to both sides of the aisle, about the need for sufficient government investment in the sound preparation and policy development to ensure a fair and accurate census, can help address this potential crisis, but

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**Proposed Increase in 2018 Census Bureau Funding Far Less Than in Previous Decennial Census Cycles**

<table>
<thead>
<tr>
<th>Change in Census Bureau Budget relative to year 6 of each decade</th>
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<tr>
<td>150%</td>
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<tr>
<td>100%</td>
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<td>50%</td>
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**2000 Census**

**1990 Census**

**2010 Census**

**2020 Census under Trump/House plan**

**Note:** All years are fiscal years. Figures show discretionary budget authority in each year of the decade relative to that in the sixth year, not adjusted for inflation.

**Source:** CSPP based on Office of Management and Budget, enacted appropriations, and draft legislation from the House Appropriations Committee.
A new way to fund grassroots LGBTQ organizing in the South

(continued from page 11)

needed, to be used by those who are most impacted. There’s a strategic reason as well: Creating legal and lived equality in the South requires that we do long-term organizing in every community, not just in large metro areas.

For CSE, funding grassroots work is a core strategy as we build a new model of Southern organizing, just like direct services and litigation. We learn from and build with our grassroots partners. In the shared work and mutuality of these relationships, there is also great joy.

Rev. Jasmine Beach-Ferrara is the executive director of the Campaign for Southern Equality, which promotes LGBTQ equality across the South. She is a minister in the United Church of Christ and a County Commissioner in Buncombe County, North Carolina.

Notes

1. According to research from Funders for LGBTQ Issues, foundation funding to LGBTQ groups in the South has increased from less than 5 percent to 25 percent in recent years, with grants primarily going to large nonprofits in metro areas.


STATEMENT OF
VANITA GUPTA, PRESIDENT & CEO
THE LEADERSHIP CONFERENCE ON CIVIL AND HUMAN RIGHTS

"HEARING ON THE 2020 CENSUS"

HOUSE COMMITTEE ON OVERSIGHT AND GOVERNMENT REFORM

October 12, 2017

Chairman Gowdy, Ranking Member Cummings, and Members of the Committee: I am Vanita Gupta, president & CEO of The Leadership Conference on Civil and Human Rights. Thank you for the opportunity to testify about planning and preparations for the 2020 Census.

The Leadership Conference is a coalition charged by its diverse membership of more than 210 national organizations to promote and protect the civil and human rights of all persons in the United States. Founded in 1950 by A. Philip Randolph, Arnold Aronson, and Roy Wilkins, The Leadership Conference works in support of policies that further the goal of equality under law through legislative advocacy and public education.

The Leadership Conference provides a powerful unified voice for the many constituencies of the coalition: persons of color, women, children, individuals with disabilities, LGBTQ individuals, older Americans, labor unions, major religious groups, civil libertarians, and human rights organizations. Given the breadth of our coalition, The Leadership Conference is ideally positioned to address many of the most pressing issues affecting the successful implementation of Census Bureau programs, surveys, and initiatives. The Leadership Conference’s coordinating role among so many diverse organizations allows for the sharing of different perspectives, as well as the development of broader strategies that occur within the purview of any individual organization. All of our work draws on the expertise of the cross-section of national organizations, and examines the impact of civil rights policy on a broad range of constituencies.

Our coalition views an accurate and fair census, and the collection of useful, objective data about our nation’s people, housing, economy, and communities generally, to be among the most important civil rights issues of our day. We and the Leadership Conference Census Task Force co-chairs, NALEO Educational Fund and Asian Americans Advancing Justice-AAJC, have a long record of first-hand experience working in support of previous censuses. For the 2010 Census, we undertook the most comprehensive and extensive effort by a stakeholder organization to promote participation in historically hard-to-count communities and to mobilize local advocates in support of the census by highlighting the community...
benefits, civil rights implications, and constitutional imperative of an accurate count. We are now building upon our previous work to help ensure that no one is left out of the 2020 Census.

Under the Constitution, Congress bears responsibility for overseeing the census and, by extension, for ensuring a fair and accurate count that supports the 14th Amendment’s guarantee of equal representation. That is why this oversight hearing is so important, and we commend the committee for focusing much-needed and welcome attention on preparations for our nation’s largest, most complex peacetime activity.

The Leadership Conference shares this committee’s interest in a modern and cost-effective census. Those are worthwhile goals and important considerations in the design of the 2020 Census. Technology undoubtedly can facilitate easy and quick participation in the census for many Americans, and administrative data maintained by other government agencies can help streamline and improve some census operations. But the primary and overarching goal of the census is a fair and accurate enumeration of all people living in the United States on Census Day. The goal of a census that is equally successful in all communities is non-negotiable.

The Importance of the Census

Article I, Section 2 of the United States Constitution places the census at the core of our democratic system of governance by calling for a count of the nation’s population every ten years. The census provides information that is the cornerstone of knowledge about all people in the United States. It is the basis for virtually all demographic and socio-economic information used by businesses, policy makers, research institutions, and nonprofit organizations.

The decennial census has several important uses. First, decennial census data on state populations determine the number of seats in Congress each state receives and how those districts are drawn, through the reapportionment and redistricting processes. Second, the census provides the figures that determine the number of electors each state receives for presidential elections. Third, census numbers determine the allocation of hundreds of billions of federal program dollars for important community services, such as schools, programs for veterans and seniors, modern transportation systems, and rural economic development. Fourth, census data are used to monitor compliance with civil rights laws and to determine where disparities exist and remediation is required. Finally, the private sector uses census data to make important decisions about their businesses, including investment strategies, hiring plans, and location of facilities.

All of these functions depend on a fair and accurate census. For all of these reasons, getting the census right is important to everyone.

Census Accuracy and the Problem of the Undercount

However, certain population groups—referred to as “hard-to-count”—are at a higher risk of not being fully counted in the decennial census. The differential undercount is a disproportionate undercounting of these population groups, most notably people of color, young children, and renters (a proxy for low-
income households), compared to non-Hispanic Whites, seniors, and homeowners. These groups have been historically underrepresented in the decennial census for decades; and for some populations—for example, young children under age five—the undercount has been getting progressively worse. Now, however, additional populations—such as rural residents and older Americans—may experience new or increased vulnerability due to major changes in methodology, such as relying on the Internet as the primary way for households to respond to the 2020 Census. Others may be reluctant to respond due to concerns about data confidentiality. Being hard-to-count can deprive people and their communities of equal political representation and their fair share of vital public and private resources.

Census tracts are considered hard-to-count, according to Census Bureau research, if they have certain population and housing characteristics associated with both low self-response and higher likelihood of being missed entirely in the census. There are hard-to-count communities in every state, and hard-to-count population groups in communities of all sizes, from large urban areas such as Denver, New York, and Omaha, to smaller cities such as Virginia Beach and Little Rock. These examples may be of particular interest to members of the Committee:

- Nearly 10 percent of census tracts in South Carolina are hard-to-count.
- 27 percent of Baltimore’s population lives in hard-to-count census tracts.
- Nearly 15 percent of Tennessee census tracts are hard-to-count.
- One quarter of San Antonio’s residents live in hard-to-count census tracts.
- Ten percent of North Carolinians live in such areas.
- One in three Oklahomans (34.5 percent) live in neighborhoods or communities that are considered more difficult to count and, therefore, are at greater risk of disproportionate undercounting.
- Roughly one in five Illinois census tracts are considered hard-to-count.
- One in ten Michigan census tracts face similar circumstances, with a staggering 65 percent of Detroit residents living in neighborhoods that are harder to count accurately.

Hard-to-count communities are not confined to urban areas. It may be less well known, but rural and remote communities, including American Indian tribal lands and reservations, are also vulnerable to disproportionate undercounting in the decennial census, with lower income households especially at risk. Eighty-seven percent (87 percent) of the hardest-to-count counties in the 2010 Census were rural counties.¹

According to the Census Bureau’s own scientific measurements, the 2010 Census undercount in areas counted using a modified method known as Update/Enumerate, was nearly eight percent (7.87 percent). Update/Enumerate operations are deployed in areas without city-style addressing or that do not receive mail through city-style addressing, such as those where people receive their mail through a Post Office Box; in communities affected by significant natural disasters, such as areas still recovering from Hurricanes Katrina and Rita in the 2010 Census; and are especially inaccessible; or have high seasonal

¹ Dr. William P. O’Hare, President, O’Hare Data and Demographic Services, LLC, tabulation for upcoming issue brief for the Carsey Institute, University of New Hampshire.
vacancy rates.

The Census Bureau is planning new methods as part of the Update/Enumerate operation for the 2020 Census, yet it was forced to cancel all pre-census testing of Update/Enumerate methods due to lack of sufficient funding. The first such tests were scheduled for earlier this year, on two American Indian reservations and adjacent tribal lands on the North and South Dakota border and in Washington State, as well as in Puerto Rico. But the uncertainty of adequate full year funding for Fiscal Year (FY) 2017 led the Bureau to cancel all 2017 census site tests. Similarly, the Census Bureau has canceled two of three dress-rehearsal sites in 2018 (the 2018 End-to-End Census Test) due to uncertainty about timely and sufficient funding. The two eliminated sites — Pierce County, Washington, and the Bluefield-Beckley-Oak Hill area of West Virginia — included the only opportunities to test, in a real-time census-like environment, special counting methods for rural areas.

With no testing opportunities on the horizon, the Census Bureau changed its counting plans for most rural areas originally slated for Update/Enumerate operations. Instead, the bureau will use an Update/Leave method, which it will test in a very limited way in 2018, but not in a rural area. The operational and cost implications of this recent design modification are, as yet, unknown. While the bureau has used Update/Leave methods in previous censuses, they have not addressed past problems of duplication, and potential new challenges of an Internet-focused enumeration, for the 2020 Census.

Failure to provide adequate resources before the once-a-decade population count will force the Census Bureau to shortchange 2020 Census operations designed to improve accuracy in historically undercounted communities. This would lead to a result that deprives population groups of equal political representation and access to their fair share of public and private resources. Equally important, failure to test all methods adequately — due to budget shortfalls — puts the 2020 Census at risk of cost overruns during peak census operations.

**A Fair and Accurate Census is At Risk**

The schedule for final census testing, preparations, and implementation over the next three years is unrelenting. At this point in the decennial cycle, the Census Bureau requires a sufficient funding ramp-up to keep 2020 Census planning and preparations on track. Funding for the decennial census is cyclical and traditionally increases significantly in the years ending in “6” through “0.”

Unfortunately, the delay in passing FY 2017 appropriations bills, coupled with underfunding in the final “omnibus” measure, forced the Census Bureau to eliminate, streamline, or delay vital planning activities, putting a fair and accurate 2020 Census in jeopardy. Furthermore, the Trump administration’s original FY 2018 budget request for the Census Bureau was inadequate and unrealistic.

These current and anticipated budget constraints are taking a toll on rigorous 2020 Census preparations. In addition to the cancellation of two of three planned sites for the 2018 End-to-End Test mentioned earlier (a dry run of all census operations that integrates all operations and IT systems for the first time), the Census Bureau eliminated the advertising campaign and Partnership Program for the 2018 dress
rehearsal. Development of the full advertising campaign and Partnership Program, which helps keep costs down by boosting self-response and increase accuracy by targeting messages to historically hard-to-count communities, is well behind schedule. The original FY 2018 budget request did not include any funding for partnership specialists, who help state and local officials and trusted community leaders support census operations through focused outreach and promotion for their constituencies. In addition, uncertainties about funding have forced the bureau to “pause” planning for the Census Coverage Measurement program, which produces undercount and overcount estimates and tells us how accurate the census is. The Census Bureau will not test this operation in the 2018 dress rehearsal as originally planned.

Simply put, the Census Bureau needs a steady ramp-up in funding to support a critical dress rehearsal, deployment of the IT architecture and field infrastructure, and development of a massive communications campaign that will encourage people to participate and, therefore, help keep census costs in check. We support the proposal in Rep. Carolyn Maloney’s new bill, to allocate roughly $1.9 billion for the Census Bureau in FY 2018. The additional funding will help the bureau meet growing costs for the data collection and processing system; restore advertising and partnership activities to the 2018 End-to-End Census Test in Providence County, RI; assess and implement modified census plans for communities in Texas, Florida, and other states hit hard by Hurricanes Harvey and Irma, as well as for Puerto Rico and the U.S. Virgin Islands; put development of the Integrated Partnership and Communications program back on track; and possibly plan a smaller, focused test of census operations in rural communities in advance of the 2020 Census.

Internet Response and Technology

As this committee knows, the Census Bureau will conduct the first “high-tech” census in 2020. The Internet response option could help keep census costs in check by increasing initial response rates, or at least holding them steady compared to 2010, thereby saving resources that can be used to find and enumerate the hardest to count. Congress must remember, however, that Internet response is not a silver bullet. The fact is, not everyone has the same connectivity, security, and comfort with the Internet. The Commerce Department’s own analyses show that communities of color, rural residents, adults with low educational attainment, low income individuals, people with disabilities, and older Americans lag behind younger, affluent, highly educated, urban, and White adults in both device and Internet penetration.

An Internet response option, while offering the promise of cost savings, could lead to poor or uneven participation, technological infrastructure failings, or both, thereby increasing the differential undercount. A lower-than-projected Internet response rate could strain the Bureau’s already limited resources by increasing response by paper questionnaire or telephone or, more worrisome, the number of households that require door-to-door follow-up.

Technology also brings cybersecurity threats, real or perceived. The security of the 2020 Census IT systems and personal census data is paramount, and the Census Bureau and its federal and private sector partners must do everything possible to ensure that security. This means there must be a comprehensive back-up plan to address any potential breaches and their consequences for the census process in real time. At the same time, the Census Bureau must have an effective communications plan to assure everyone in the United States that their personal information is secure - in other words, to build confidence in a high-
tech census at a time when many people are wary. Lack of confidence in data security could depress
Internet response rates (more so if a large business or another government agency suffers a cyber-attack
near the time of the census), thus increasing costs and enumeration challenges considerably.

It is still possible that a streamlined state-of-the-art program could produce a fair and accurate census,
while simultaneously meeting Congress’ challenging budget restrictions. However, to uphold its
constitutional duty and ensure an accurate and fully inclusive count, Congress must allocate the resources
for comprehensive risk management and preparations for real-time back-up methods and operations.

To address these and other concerns related to a high-tech census, we are pleased to offer for the record a
new report from The Leadership Conference Education Fund and the Georgetown Center on Poverty and
Inequality, entitled Counting Everyone in the Digital Age. The report addresses how proposed Internet
and automation technologies will affect 2020 Census enumeration for groups at risk of being
undercounted, and includes actionable recommendations for Congress, the administration, and
community leaders.

**Utilizing Administrative Records**

The Census Bureau is evaluating the use of administrative records to obtain missing information about
unresponsive households in lieu of in-person, door-to-door follow-up visits by Census enumerators.
However, the implications of such a methodology for data quality and consistency and census accuracy
are not clear. There are a number of questions that the Census Bureau must address and resolve before
stakeholders have confidence that a broad use of these data will not compromise census accuracy or
undermine the goals of eliminating the differential undercount and collecting more accurate race and
ethnicity data for all communities. The Bureau will be hindered in resolving outstanding concerns about
its potential use of administrative records if it conducts an End-to-End Census Test that is far less
comprehensive than originally planned. We offer for the record a new report, Administrative Records in
the 2020 U.S. Census: Civil Rights Considerations and Opportunities, which is the culmination of a
project of the Urban Institute, The Leadership Conference, and the Georgetown Center on Poverty and
Inequality, to examine, from the perspective of civil rights stakeholders, the benefits and risks of utilizing
administrative data for the U.S. population in general and for specific vulnerable subpopulations such as
communities of color, the impoverished, immigrants, homeless, those participating in government
assistance programs, and others, in the upcoming census.

**Other 2020 Census Challenges**

Counting every person residing in the United States is a difficult endeavor. But even with careful
planning, several other factors—many out of the Census Bureau’s control—pose significant risks to a fair
and accurate census,

First, proposals to add untested and unnecessary questions—including about immigration status—to the
census form at the 11th hour could derail eight years worth of research and testing and result in an
expensive, yet ultimately failed, census.
Second, the reluctance of many individuals to provide personal information voluntarily to the government poses an additional barrier to a full count. The Census Bureau will face this challenge in many parts of the country and in many types of communities.

Finally, there remains a leadership vacuum at the Bureau following the unexpected resignation of the Census Director in June, as well as other high-level vacancies at the Commerce Department and the Census Bureau.

Regrettably, we fear that the strict budget constraints Congress has imposed on the 2020 Census add to these formidable barriers. The Census Bureau will try to minimize undercounting, but will be hampered by a smaller footprint in the field. Budget shortfalls have caused the cancellation of the advertising campaign and Partnership Program for the End-to-End Census Test and delays in researching and developing a full communications campaign and Partnership Program. These activities keep costs down by boosting self-response and increase accuracy by targeting messages to motivate response in historically hard-to-count communities. A robust Partnership Program is especially critical in light of the realignment of the Bureau’s field office structure following the 2010 Census, including plans to employ, at most, half the staffing used for the 2010 Census.

Conclusion

Members of Congress are fully aware that the census has political consequences—in fact, the Constitution says as much, by basing congressional apportionment and equal representation on the population count. But the conduct of the census must be strictly nonpartisan and must strive to achieve an equally accurate count in all communities.

The Leadership Conference and its member organizations look forward to working with all members of this committee to ensure a cost-effective, secure, and above all, accurate and inclusive census in every one of the nation’s communities. When people — your constituents — are not counted in the census, they remain invisible for the next ten years. And overcounts — that is, counting people twice or including them by mistake — do not benefit anyone either, because policymakers have a skewed picture of where to direct hard-earned, limited taxpayer dollars. There are no do-overs with the census. The Census Bureau must get it right the first time, and all of us — members of Congress, county officials and mayors, school principals, veterans advocates, businesses large and small, and, indeed, every person in the United States — must live with the results for the next ten years.

Experts already concerned about census response rates say the query would cause even fewer people to respond.

By Sam Levine

The Department of Justice’s recent request to add a question about citizenship to the 2020 census has sparked concerns that such a move would lower response rates within immigrant communities.

An inaccurate Census would have severe consequences. The survey helps determine the allocation of nearly $700 billion each year in federal money, the number of representatives each state has in the U.S. House and how other electoral districts are drawn.

Even before ProPublica reported the Department of Justice request to the Census Bureau for the citizenship question, officials already faced significant challenges in getting people to respond. Among those is convincing people that the Census Bureau, which is overseen by the Commerce Department, won’t share data on individuals with other government agencies, said Arturo Vargas, the executive director of the National Association of Latino Elected and Appointed Officials Educational Fund.

“What has happened in the past year or so, given the political environment, is that immigrants have become much more fearful” of contact with the federal government, Vargas told HuffPost. “These are not just undocumented immigrants. They’re legal...
permanent residents, they're U.S. citizens who have family members who are immigrants."

Vargas, who also is a member of the Census Bureau's National Advisory Committee on Racial, Ethnic, and Other Populations, said part of this fear arises from the policies and "new tone" of the Trump administration toward immigrants.

"So adding the citizenship question to [the census] is going to exponentially increase that hurdle to convince everybody that nothing's going to happen to you if you answer this survey," he said.

"The U.S. Census Bureau is evaluating the request from the U.S. Department of Justice and will process it in the same way we have historically dealt with such requests. The final list of questions must be submitted to Congress by March 31, 2018. Secretary [Wilton] Ross will then make a decision. Our top priority is a complete and accurate 2020 Census," the bureau said Thursday in a statement.

The Justice Department, in its Dec. 12 letter to the Census Bureau, said it needs data on non-citizens to better enforce Section 2 of the Voting Rights Act. That provision prohibits the drawing of electoral maps in such a way as to dilute the influence of minority votes. DOJ said the data on non-citizens would ensure districts are drawn in a way that fairly represents minority citizens.

Voting rights lawyers question that rationale, noting that the Census Bureau already asks people if they are citizens through the American Community Survey (ACS), which every year goes out to about 3 million households and extrapolates information about the U.S. population. The Justice Department said in its letter the ACS data was insufficient for voting rights enforcement and that the citizenship question should be included in the formal census, something that has not been done since 1950.

John Yang, the president and executive director of Asian Americans Advancing Justice | AAJC, told HuffPost that asking about citizenship on the census would hinder the government from collecting accurate data.

"Putting it in the minds of the immigrant, they will have a certain paranoia," he said. "Even if they are a citizen themselves, they will say, 'Well, does this mean that they are asking me about my relatives that are here? How will this information be used against me?' Just by its nature, because this is something that goes to the core of someone's presence in the United States, they are going to be fearful."

He added that among immigrants who are not English proficient, the citizenship question would "raise in them a whole host of questions of 'I don't want to lie, I don't want to misstate anything, so it's easiest just not to answer.'"

John Thompson, the former Census Bureau director who resigned in May, said he would not advise adding a question about citizenship because census officials hadn't had a chance to measure how it would affect the response rate.

"From a census point of view ... you don't do things until you understand the effect," he told HuffPost. Census officials don't understand the effect (of adding the citizenship question): Without being able to measure it and trying to understand how this would affect the census and the census environment, for me, it would be hard to make that recommendation."

Some lawmakers have previously tried to pass legislation requiring a citizenship question on the census. Rep. Clay Higgins (R-La.) last year unsuccessfully sought to withhold funding for the Census Bureau unless it added such a question.
Rep. Steve King (R-Iowa) said in December he wants the census to count citizens separately from non-citizens and then use only the count of citizens to determine the apportionment of congressional seats. The U.S. Constitution requires congressional seats to be apportioned based on a count of all “persons,” not just citizens.

Terri Ann Lownenthal, who worked as staff director of the House census oversight subcommittee from 1987-1994, said that adding a question about citizenship would produce inaccuracies that would have far-ranging consequences.

Asking about citizenship “will depress response rates and just lead to a completely inaccurate census in many areas,” she said. “Those same data must be used for redistricting, as well as the allocation of hundreds of billions of dollars a year for federal funds for vital services, as well as state funds for community purposes.”

Census researchers conducting tests in preparation for 2020 already have been raising concerns about the impact of harsh immigration rhetoric on response rates. In a September memo, the researchers said field representatives and supervisors were seeing an unprecedented amount of concern about the confidentiality of census data, particularly among immigrants. The officials observed test respondents “falsifying names, dates of birth, and other information on household rosters.” In focus groups conducted in several languages to test messages for the census, respondents expressed concern about opening their door for a census-taker out of fear they could be deported.

“Spanish-speakers brought up immigration raids, fear of government, and fear of deportation. Respondents talked about having received advice not to open the door if they fear a visit from Immigration and Customs Enforcement” agents, the memo said.

The researchers called the responses “eye-opening” because many of the respondents had participated in previous census-related testing and not expressed similar nervousness or hesitation about sharing information.

This article has been updated with a statement from the Census Bureau.

RELATED COVERAGE

Experts Are Really, Really Worried About The State Of The 2020 Census

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Census 2020: Research and Messaging

January 22, 2018

Presented by
Arturo Vargas
Executive Director,
NALEO Educational Fund
Research and Messaging Goal

• Key ideas to test and understand: interest/awareness of Census, empowerment/resistance, convenience/compliance, and community benefit

• Identify concerns about Census participation across formats (in-person, online, etc)

• Identify trusted messengers, especially on traditional media and social media platforms

• Assess existing interest and determine which messages move people to action

• Test behavioral outcomes, not just attitudes

• Understand the Hard-to-Count Latino community

• Complement research conducted by the Census and other groups/organizations
Target Research Population

National Poll

• Nationally representative sample of the adult Latino population

• Participants will also be assigned to treatment groups, or the control group to test most effective message(s)

Focus Groups - Messages from the survey experiment (national poll) will be tested to evaluate what refinements are needed, given local and/or demographic nuances

• Hispanic adults who reside in two target areas (Site options: Atlanta, Charlotte or Raleigh NC, Houston or Dallas)

• Mix of gender, age, language preference and nativity

• English group and one Spanish group

• Two groups with women, two groups with men

• Ensure Hard to Count populations are included
2020 Census: Research and Messaging Timeline

2018

January to May – Conduct national poll and focus groups
May to June – National poll and focus group analysis and report
June - December – Messaging development and deployment

2019 - 2020

January to April/May – Conduct national poll and focus groups to update/refresh messaging; emphasis on helping inform a “Get Out the Count” program
May to June – National poll and focus group analysis and report
May 2019 – April 2020 – Refine messaging and deploy, including a field, media, and social media campaign
Thank you.

Arturo Vargas
Executive Director
avargas@naleo.org
Twitter: @ArturoNALEO

www.naleo.org
Opinion: 2020 Census will be a disaster for California without more money

By ARTURO VARGAS and JOHN DOBARD

PUBLISHED: December 7, 2017 at 11:00 am | UPDATED: December 7, 2017 at 3:35 pm

Alarms about poor preparation for the 2020 Census are ringing across the nation, but perhaps no where louder than in California. The Golden State, with almost 39 million residents, has the largest stake in a fair and accurate census.

The U.S. Constitution requires a new count of the population every 10 years. It’s a massive undertaking, involving more than a decade of planning, elaborate tests of new methods, engagement outreach to a more diverse and mobile population, and hiring a temporary workforce of more than half a million to contact those who fail to self-respond.

But so far, Congress has severely underfunded preparations for the 2020 Census by hundreds of millions of dollars.

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The census is more than a head count. The framers intended it to ensure the fair allocation of political power. Population data from the census are used for the reapportionment of congressional seats and the redistricting of California’s state and local government political districts.

Census data also guide $87 billion annually in federal funds to the Golden State. These funds are for such vital needs as Medicaid and Medicare (Part B), Head Start, school lunch programs, highways and transportation and housing assistance. All depend on the census count.

Census data are used in civil rights and voting rights enforcement. The information is used to protect access to the ballot, to monitor discrimination and to examine economic equality.

Today the Census Bureau’s annual budget sits stalled at last year’s level because of a continuing resolution passed by Congress and signed by President Donald Trump. The administration and Congress have yet to act on more funding.

California is more than the largest state; it is the most diverse state in the nation. For the Census Bureau, whose job is to count and place every resident of our state, the challenge in California may be greater than anywhere else in the nation.

Latinos are one of the fastest growing population groups in California. They represent about 40 percent of the population and increased by 9 percent since the last census.

Nationally, Latinos have one of the highest undercounts of any population group in the census. So, one of the largest, growing segments of California’s population is going to be one of the most difficult to count in the next census.

Historically, the Census Bureau has made serious resources into neighborhoods with large communities of color. This effort, now threatened by insufficient funding.

In California, at least 25 percent of residents, or 9.7 million people, are in localities the Census Bureau refers to as “Hard-to-Count” tracts. Communities of color make up a large portion of these tracts. In California, 38 percent of African-Americans, 34 percent of Latinos, 20 percent of Asians live in Hard-To-Count areas, according to the Census Bureau.

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https://www.mercurynews.com/2017/12/07/opinion-2020-census-will-be-a-disaster-for-calif...
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Californians cannot afford to wait until 2020 to protect our stake in the national head count. The time to send an alarm to Washington, D.C., is now.

The Trump administration recently asked Congress to increase funding for the Census Bureau in 2018 by $187 million to make up for past underinvestment. We believe the appropriate increase is closer to $400 million to get started in outreach, partnership and testing of new operations that promise to ensure a complete, fair and accurate count.

We encourage readers to contact their U.S. Senators and Congressional Representatives now, before the final 2018 funding bill is considered this month. Our state has too much at stake for the next decade to settle for anything less.

Dr. John Dobard is manager of Political Voice, Advancement Project California, a multiracial civil rights organization. Arturo Vargas is executive director of the National Association of Latino Elected and Appointed Officials (NALEO) Educational Fund.

Tags: Census, Commentary, Regional

Arturo Vargas

John Dobard

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From: Kris Kobach [mailto:]

Sent: Monday, July 24, 2017 2:43 PM

To: Teramoto, Wendy (Federal)

Cc: Alexander, Brooke (Federal); Hernandez, Israel (Federal)

Subject: Re: Follow up on our phone call

Yes.

Sent from my iPhone

On Jul 24, 2017, at 1:39 PM, Teramoto, Wendy (Federal) wrote:

Kris- can you do a call with the Secretary and Izzy tomorrow at 11 am? Thanks. Wendy

From: Kris Kobach [mailto:]

Sent: Monday, July 24, 2017 12:02 PM

To: Teramoto, Wendy (Federal)

Subject: Re: Follow up on our phone call

That works for me. What number should I call? Or would you like to call me?

On Mon, Jul 24, 2017 at 9:12 AM, Teramoto, Wendy (Federal) wrote:

We can speak today at 230. Please let me know if that works. W

Sent from my iPhone

On Jul 21, 2017, at 4:34 PM, Kris Kobach wrote:

Wendy,

Nice meeting you on the phone this afternoon. Below is the email that I sent to Secretary Ross. He and I had spoken briefly on the phone about this issue, at the direction of Steve Bannon, a few months earlier.

Let me know what time would work for you on Monday, if you would like to schedule a short call. The issue is pretty straightforward, and the text of the question to be added is in the email below.
Thanks.

Kris Kobach

-------- Forwarded message --------
From: Kris Kobach <kris.kobach@ks.gov>
Date: Fri, Jul 14, 2017 at 9:12 AM
Subject: Follow up on our phone call
To: [Redacted]

Secretary Ross,

Kansas Secretary of State Kris Kobach here. I'm following up on our telephone discussion from a few months ago. As you may recall, we talked about the fact that the US census does not currently ask respondents their citizenship. This lack of information impairs the federal government's ability to do a number of things accurately. It also leads to the problem that aliens who do not actually "reside" in the United States are still counted for congressional apportionment purposes.

It is essential that one simple question be added to the upcoming 2020 census. That question already appears on the American Community Survey that is conducted by the Census Burear (question #8). A slight variation of that question needs to be added to the census. It should read as follows:

**Is this person a citizen of the United States?**

☐ Yes, born in the United States

☐ Yes, born in Puerto Rico, Guam, the U.S. Virgin Islands, or Northern Marianas

☐ Yes, born abroad of U.S. citizen parent or parents

☐ Yes, U.S. citizen by naturalization – Print year of naturalization _____

☐ No, not a U.S. citizen – this person is a lawful permanent resident (green card holder)

☐ No, not a U.S. citizen – this person citizen of another country who is not a green card holder (for example holds a temporary visa or falls into another category of non-citizens)

Please let me know if there is any assistance that I can provide to accomplish the addition of this question. You may reach me at this email address or on my cell phone at [Redacted]

Yours,

Kris Kobach
Dear Mr. Jarmin,

I am very concerned, after reading an article in today’s NY Times, about a request from the Justice Department to include a question about citizenship in the general census. This question has not been asked in a general census since 1960 and is very likely to result in an inaccurate count, disproportionally affecting people of color.

In addition, such a late request (Dec.12, 2017) does not allow proper time to vet the writing of such a question or to really consider the negative effects. Please do NOT allow such a question to be added and thus affect the lives of many people by inaccurately tallying the number of persons in the U.S. for the purpose of equitable representation.

Sincerely yours,

Gay E. Lasher, Psy.D.
Citizenship question on census survey

Subject: Citizenship question on census survey

From: Gay E. Lasser
Sent: Wednesday, January 3, 2018 12:57 PM
To: Ron S. Jarmin (CENSUS/ADEP/ID)

Subject: Citizenship question on census survey

Dear Mr. Jarmin,

I am very concerned, after reading an article in today’s NY Times, about a request from the Justice Department to include a question about citizenship in the general census. This question has not been asked in a general census since 1960 and is very likely to result in an inaccurate count, disproportionally affecting people of color.

In addition, such a late request (Dec. 12, 2017) does not allow number of persons in the U.S. for the purpose of equitable representation.

Sincerely yours,
Gay E. Lasser, PhD

1/4/18 5:42 PM Rachel Tells

Thank you for your email to Ron Jarmin and for your attention to the important 2020 Census. We are always interested to hear from the public and appreciate you taking the time to share your thoughts. Visit census.gov to stay connected and sign up for the latest news and updates from the Census Bureau delivered directly to your inbox.

If you have the ability to do hotlinks, please use this link: https://public.govdelivery.com/accounts/USCENSUS/subscriber-show in the second sentence, linking the words “sign up” to that link if possible.

We hope you will find the information helpful.

Thank you.
Denise Carpenter

Ron Jarmim

Washington, DC 20233

4600 Silver Hill Rd.
US Census Bureau

1-17-18

Jan 7, 2018

Dear Ron,

I hope my reply to your message has arrived. I have been trying to find out more about the Census Bureau. I am interested in the Bureau's work and would like to learn more about it.

Best regards,

Denise Carpenter
The Honorable Secretary Wilbur Ross  
U.S. Department of Commerce  
1401 Constitution Ave NW  
Washington, D.C. 20230  

Dear Secretary Ross:  

We write in response to the U.S. Department of Justice’s (DOJ) proposal to add an additional untested subject to the upcoming decennial census. Adopting this question on citizenship and legal status will negatively affect response rates, jeopardize the accuracy of the collected surveys, and deter many people from participating. The 2020 Census already faces significant planning and operational challenges, and we urge you to reject this misguided and problematic proposal.  

As you know, the Census Bureau is already in the final stages of preparing the questions and format of the 2020 Decennial Census. Over the past several years, the Bureau has tested various question options, languages, and other important issues. To the best of our knowledge, at no point has the Census Bureau considered including a question on citizenship. In fact, the list of topics for the decennial census provided to Congress in March 2017 and available for public review does not include a question on citizenship. Given that the Bureau must submit its questions and form to Congress by March of this year, it is very unlikely that the Bureau would even be able to appropriately test the impact of such a question on response rates and other issues.  

There is also significant reason to question the need for including a question on citizenship on the 2020 Census form. This information is already collected via the American Community Survey, and despite intimations to the contrary, this information has been appropriately used in a variety of Voting Rights Act cases without concern. It is also noteworthy that the request for this potential change came from DOJ’s Justice Management Division, rather than the Civil Rights Division which actually enforces the Voting Rights Act.  

It is also important to recognize that the communities most affected by the Voting Rights Act have not requested this question for inclusion in the upcoming census. Nor has the Census Bureau’s National Advisory Committee on Racial, Ethnic and Other Populations (NAC) requested this change. This lack of stakeholder support further undermines this request.
Lastly, this is a potentially unwise change based on ongoing problems faced by the Bureau. Due to budgetary and time constraints, the Census Bureau is already facing serious challenges to its planned preparations for the 2020 Census. Last year, the Bureau was forced to cancel a field-test of Spanish language surveys as well as the testing of non-traditional addresses located in Puerto Rico and on tribal reservations. Two locations were also removed from the Bureau’s end-to-end test of decennial census systems. Furthermore, the Bureau has delayed plans to open local census offices and conduct outreach campaigns in support of the 2020 Census. Given these serious concerns, the Census Bureau should refrain from adding further problems to this process.

Since 1790, every census has included citizens and non-citizens alike. In fact, the Constitution of the United States mandates that the number of “persons” be counted. That mission will be threatened if the Bureau accedes to the Justice Department’s request. Disrupting preparations for the 2020 Census to add an additional untested subject, especially at this pivotal point, would undermine both the funding and years we have already spent on research and testing. Congress heavily relies on the census to allocate funding for vital federal grant programs and for the distribution of much-needed resources to our communities; this remains especially true for decennial surveys, which also directly impact the redistricting process.

It is our obligation to ensure that the Bureau receives accurate information about our population. We must also ensure that all of our communities are properly accounted for, and that each household is correctly counted the first time. On behalf of our constituencies, we urge you to oppose this proposal. We thank you for your attention to this critical matter and look forward to further supporting the Bureau as it prepares for the decennial census.

Sincerely,

[Signature]
Jose E. Serrano
Member of Congress

[Signature]
Grace Meng
Member of Congress
February 22, 2018

The Honorable José E. Serrano  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Serrano:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a full, fair, and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I reported back to Congress last October after I conducted a rigorous deep dive to produce a new 2020 Census lifecycle cost estimate as well as a thorough review of Census programming and financial management. I have assembled a multidisciplinary team to address and remedy concerns expressed by the Government Accountability Office, the Department of Commerce’s Office of the Inspector General, the Office of Management and Budget, and Congressional members. In addition, I have put into place the people, processes, and programs to ensure strong governance and oversight of the 2020 Census.

We will keep you apprised of any developments regarding the citizenship question. If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross

[Signature]
February 22, 2018

The Honorable Grace Meng  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Meng:

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Sincerely,

Wilbur Ross
FEB 20 2018

Ms. Denise Carpenter

Dear Ms. Carpenter:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. We appreciate your taking the time to make me aware of your position on this important matter.

The U.S. Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a full, fair, and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority.

We will keep you apprised of any developments regarding the citizenship question. If you have any additional questions or would like to discuss this matter further, please contact our Office of Congressional and Intergovernmental Affairs at 301-763-6100.

Sincerely,

Ron S. Jarmin
Performing the Non-Exclusive Functions
and Duties of the Director
January 4, 2018

Honorable Wilbur L. Ross
Secretary of Commerce
U.S. Department of Commerce
1401 Constitution Ave NW
Washington, DC 20230

Dear Secretary Ross:

I write as the president and CEO of The Leadership Conference on Civil and Human Rights, a coalition charged by its diverse membership of more than 200 national organizations to promote and protect the civil and human rights of all persons in the United States. In this capacity and on behalf of this broad coalition, I urge you to reject the request in the December 12, 2017 letter from the Department of Justice to Acting Census Director Ron Jarmin, to add a new citizenship question to the 2020 Census. As you well know, adding a new and untested question to the 2020 Census would disrupt preparations at a pivotal point in the decade, undermine years of costly, painstaking research and testing, and increase census costs significantly at a time when Congress has directed a less expensive enumeration. All of these factors would threaten a fair and accurate decennial census.

We appreciate the commitment to a full, fair, and accurate census that you and your senior staff have recently expressed. The Leadership Conference views a fair and accurate census, and the collection of useful, objective data about our nation’s people, housing, economy, and communities generally, to be among the most important civil rights issues of our day. However, as discussed below, the Justice Department’s ill-advised proposal poses a significant threat to our shared goal.

First, as you noted during the House Committee on Oversight and Government Reform’s October 12, 2017 hearing on the 2020 Census (where we both testified), requiring a new topic this late in the preparations for the census is irresponsible because robust testing for new questions in a contemporary, census-like environment is essential. This is especially true given the chilling effect of adding a citizenship question to the form. Census preparations are already behind schedule, the final dress rehearsal will kick off in a month, and there simply is no time left to redesign the census form and rigorously test the proposed additional question. As we know from extensive research and testing in the survey field, even small changes in question order and wording can significantly affect both the rate and accuracy of responses. Yet the Census Bureau has neither the time nor the resources to evaluate the consequences of such a major change in the questionnaire.

Second, as I know from my prior experience as the chief government enforcer of the Voting Rights Act, the Justice Department has never needed to add this new question to the decennial census to enforce the Voting Rights Act before, so there is no reason it would need
to do so now. Contrary to the Justice Department’s letter, the Census Bureau has not included a citizenship question on the modern census “short form,” sent to every household. In fact, no such question has appeared on the census “short form” since enactment of the Voting Rights Act in 1965. Estimates of the citizen voting-age population derived from the ongoing American Community Survey, and the so-called census “long” or sample form before that, have been and continue to be suitable for purposes of civil rights and Voting Rights Act enforcement. Whether utilizing such data for Section 2 enforcement actions, Section 203 determinations, or other voting rights enforcement efforts, courts and the Justice Department have accepted census data as currently collected since enactment of the Voting Rights Act. Civil rights groups, likewise, have never asserted a need for a “100 percent” census citizenship question in order to effectively represent and ensure voting rights for minority communities. Given these plain facts, the entire justification for the request should be viewed skeptically as an attempt to throw a wrench into final planning and preparations for an enumeration that already faces enormous challenges, including inadequate and delayed funding, cyber-security risks, and a climate of fear fanned by anti-immigrant rhetoric.

Third, this new proposed question on the 2020 Census is unnecessarily intrusive and will raise concerns in all households — native and foreign born, citizens and noncitizens — about the confidentiality of information provided to the government and how government authorities might use that information. Asking every household and every person in the country about their citizenship status in the current political environment — when there is no legal basis or need for doing so — will no doubt give many people pause about participating in the census altogether. In fact, new Census Bureau research already is raising alarm bells about the growing reluctance of immigrant households to participate fully and honestly in any Census Bureau surveys, due to their fear about how their responses will be used by government agencies.

Adding this new question would also result in taxpayers spending significantly more for a government undertaking that we know in advance would not be successful. Your recent oral testimony before Congress acknowledged that the Census Bureau will need billions of dollars more than originally estimated to conduct a modern, inclusive census. The Justice Department’s proposal to add a new citizenship question would increase census costs even further while decreasing accuracy, because self-response rates are certain to plummet, which in turn will require additional, costly door-to-door visits that still may not spur cooperation or result in accurate responses.

Finally, this request — coming almost a year after the Census Bureau has finalized topics for the 2020 Census, as required by law — risks jeopardizing the accuracy of the 2020 Census in every state and every community by deterring many people from responding, making the data collected in this crucial once-a-decade operation less accurate and useful for all of us. As four former Census Directors, who served in both Republican and Democratic administrations, wrote in an amici curiae brief in the Supreme Court case *Evenwel v. Abbott*, asking about citizenship status in the decennial census “would likely exacerbate privacy concerns and lead to inaccurate responses from non-citizens worried about a government record of their immigration status...The sum effect would be bad Census data.”

I know you appreciate that the stakes of a fair and accurate census are high and everyone — from Congress to governors, mayors, and school board officials, to business owners and nonprofits serving the most vulnerable in our communities — will have to live with any flawed results for the next 10 years. The
Leadership Conference and its member organizations look forward to working with you and your staff to ensure a cost-effective, secure, and above all, accurate and inclusive census in every one of the nation's communities. If you have any questions, please contact me or Chris Harley, Census Campaign Director, at (202) 466-3311. Thank you for your consideration of our views.

Sincerely,

[Signature]

Vanita Gupta

Cc: Acting Deputy Secretary and Under Secretary for Economic Affairs Karen Dunn Kelley
    Acting Census Director Ron Jarmin
Dear Secretary Ross:

I write as the president and CEO of The Leadership Conference on Civil and Human Rights, a coalition charged by its diverse membership of more than 200 national organizations to promote and protect the civil and human rights of all persons in the United States. In this capacity and on behalf of this broad coalition, I urge you to reject the request in the December 12, 2017 letter from the Department of Justice to Acting Census Director Ron Jarmin, to add a new citizenship question on the 2020 Census. As you well know, adding a new and untested question to the 2020 Census would disrupt preparations at a pivotal point in the decade, undermine years of costly, painstaking research and testing, and increase census costs significantly at a time when Congress has directed a less expensive enumeration. All of these factors would threaten a fair and accurate decennial census.

Please see the attached letter regarding this important issue.

Sincerely,
Vanita Gupta

Vanita Gupta
President and CEO
The Leadership Conference on Civil and Human Rights
The Leadership Conference Education Fund
@vanitaguptacr

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March 13, 2018

Ms. Vanita Gupta  
President and Chief Executive Officer  
The Leadership Conference on Civil and Human Rights  
1620 L Street, NW, Suite 1100  
Washington, DC 20036

Dear Ms. Gupta:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a complete and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I have conducted a rigorous review and produced a new 2020 Census lifecycle cost estimate, and I have put into place the people, processes, and programs necessary to ensure strong governance and oversight of the 2020 Census.

If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross

Wilbur Ross
Karen,

Please see note from Arturo to you and my response below. He got your email wrong.

Also, I sent a couple emails yesterday I’d like make sure you see relevant to the DOJ request.

Thanks from chilly philly.

Sent from my iPhone

Begin forwarded message:

> From: "Ron S Jarmin (CENSUS/ADEP FED)" >
> Date: January 4, 2018 at 6:49:32 PM EST
> To: "[black]
> Cc: "[black]"
> Subject: Re: DOJ request to the Census Bureau

Arturo,

Thanks for your note. We are reviewing the DOJ request as we do all such requests. This includes exploring options that don’t require adding questions to the census. We hope to expedite the process and come to a resolution soon.

Regards

Ron

Sent from my iPhone

On Jan 4, 2018, at 6:35 PM, Arturo Vargas <[black]> wrote:

Dear Madam Secretary,

I hope you were able to have a restful break over the holidays and that 2018 is off to a good start despite the particularly cold weather on the east coast.

Thank you again for taking the time to meet with me last month to
discuss our shared concerns with the 2020 Census. The public reports from last week that the Department of Justice has requested the Census Bureau to add a question on citizenship has raised yet additional concerns on my end. We discussed some of the challenges the Bureau will encounter in securing full public cooperation in the 2020 Census and this issue would complicate the situation. I would welcome the opportunity to speak with you about my concerns on this matter, some of which have been reported by the media, but I hope to share with you directly and also hear your perspective on the issue. I look forward to hearing from your office about a time when we may be able to connect by phone at your convenience.

Best regards,

Arturo Vargas

Arturo Vargas
Executive Director

NALEO Educational Fund
1122 W. Washington Blvd., 3rd. Floor
Los Angeles, CA 90015

@ArturoNALEO

NALEO Educational Fund is the leading nonprofit, non-partisan organization that facilitates full Latino participation in the American political process, from citizenship to public service.

<image004.png>
January 5, 2018

The Honorable Wilbur Ross  
Secretary of Commerce  
U.S. Department of Commerce  
1401 Constitution Avenue NW  
Washington, DC 20230

Dear Secretary Ross:

We write to express our serious concern about the recent Department of Justice (DOJ) request to add a question on citizenship to the 2020 Census and urge you to not add this question.\(^1\) The inclusion of a question on citizenship threatens to undermine the accuracy of the Census as a whole, and given this administration’s rhetoric and actions relating to immigrants and minority groups, the DOJ request is deeply troubling.

Article I, Section 2 of the U.S. Constitution requires a census of all persons residing in the United States every ten years, as directed by Congress. As you know, the decennial census is the basis for critical aspects of our democracy, such as distributing the number of seats in the U.S. House of Representatives and drawing congressional and state legislative district lines. Census data are used for allocating billions of dollars in federal funding and are important to every level of government, as well as to businesses and nonprofits.

Despite its importance, the 2020 Census is in trouble. In February 2017, the GAO put the 2020 Census on its list of high-risk projects due to uncertainty about its budget and technology.\(^2\) The planning and preparations for the 2020 Census are significantly behind schedule and underfunded. Furthermore, since the previous director of the Census Bureau resigned in June of 2017, the Bureau has been left without a permanent director. New questions in the census must be field-tested and subject to a lengthy Office of Management and Budget approval process. Introducing a question on citizenship so late in an already delayed timeline would not allow the Bureau to appropriately test its impact and effectiveness.

The DOJ’s request to include a question on citizenship in the 2020 Census dramatically increases our concerns about the already troubled census.\(^3\) Such a question would likely depress participation in the 2020 Census from immigrants who fear the government could use the information to target them. It could also decrease response rates from U.S. citizens who live in mixed-status households, and who might fear putting immigrant family members at risk through

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providing information to the government. As you testified before Congress, the Census is already grappling with “high levels of mistrust of the federal government.” The addition of a citizenship question would only further exacerbate an already severe obstacle facing an accurate count in 2020.

This chilling effect could lead to broad inaccuracies across the board, from how congressional districts are drawn to how government funds are distributed. Rather than preserve civil rights, as the Justice Department claims, a question on citizenship in the decennial census would very likely hinder a full and accurate accounting of this nation’s population.

On October 31, 2017, in testimony to the Senate Homeland Security and Governmental Affairs Committee, you stressed the importance of an “efficient 2020 Census that provides a full, fair, and accurate count of everyone living in this country.” We agree with you, and urge you to live up to this commitment by rejecting this harmful and misguided request for a question on citizenship in the 2020 Census. We look forward to your response.

Sincerely yours,

Dianne Feinstein  
United States Senator

Thomas R. Carper  
United States Senator

Brian Schatz  
United States Senator

Catherine Cortez Masto  
United States Senator

Kamala D. Harris  
United States Senator

CC: Dr. Ron Jarmin, Acting Director, U.S. Census Bureau  
CC: The Honorable Karen Dunn Kelley, Acting Deputy Commerce Secretary/Undersecretary for Economic Affairs, U.S. Department of Commerce

---

January 31, 2018

The Honorable Kamala D. Harris  
United States Senate  
Washington, DC 20510  

Dear Senator Harris:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a full, fair, and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I reported back to Congress last October after I conducted a rigorous deep dive to produce a new 2020 Census lifecycle cost estimate as well as a thorough review of Census programming and financial management. I have assembled a multidisciplinary team to address and remedy concerns expressed by the Government Accountability Office, the Department of Commerce’s Office of the Inspector General, the Office of Management and Budget, and Congressional members. In addition, I have put into place the people, processes, and programs to ensure strong governance and oversight of the 2020 Census.

We will keep you apprised of any developments regarding the citizenship question. If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross
January 31, 2018

The Honorable Catherine Cortez Masto  
United States Senate  
Washington, DC 20510

Dear Senator Cortez Masto:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a full, fair, and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I reported back to Congress last October after I conducted a rigorous deep dive to produce a new 2020 Census lifecycle cost estimate as well as a thorough review of Census programming and financial management. I have assembled a multidisciplinary team to address and remedy concerns expressed by the Government Accountability Office, the Department of Commerce’s Office of the Inspector General, the Office of Management and Budget, and Congressional members. In addition, I have put into place the people, processes, and programs to ensure strong governance and oversight of the 2020 Census.

We will keep you apprised of any developments regarding the citizenship question. If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross

[Signature]

000783
January 31, 2018

The Honorable Brian Schatz  
United States Senate  
Washington, DC 20510

Dear Senator Schatz:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a full, fair, and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I reported back to Congress last October after I conducted a rigorous deep dive to produce a new 2020 Census lifecycle cost estimate as well as a thorough review of Census programming and financial management. I have assembled a multidisciplinary team to address and remedy concerns expressed by the Government Accountability Office, the Department of Commerce’s Office of the Inspector General, the Office of Management and Budget, and Congressional members. In addition, I have put into place the people, processes, and programs to ensure strong governance and oversight of the 2020 Census.

We will keep you apprised of any developments regarding the citizenship question. If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross
January 31, 2018

The Honorable Thomas R. Carper  
United States Senate  
Washington, DC 20510  

Dear Senator Carper:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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We will keep you apprised of any developments regarding the citizenship question. If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross

Wilbur Ross
January 31, 2018

The Honorable Dianne Feinstein  
United States Senate  
Washington, DC 20510  

Dear Senator Feinstein:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a full, fair, and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I reported back to Congress last October after I conducted a rigorous deep dive to produce a new 2020 Census lifecycle cost estimate as well as a thorough review of Census programming and financial management. I have assembled a multidisciplinary team to address and remedy concerns expressed by the Government Accountability Office, the Department of Commerce’s Office of the Inspector General, the Office of Management and Budget, and Congressional members. In addition, I have put into place the people, processes, and programs to ensure strong governance and oversight of the 2020 Census.

We will keep you apprised of any developments regarding the citizenship question. If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross

Wilbur Ross
January 5, 2018

Secretary Wilbur Ross
Department of Commerce
1401 Constitution Avenue NW
Washington, DC 20230

Dear Secretary Ross:

I write today on behalf of the 12,000 members of the American Sociological Association, the nation’s largest professional association for teachers, scholars, and practitioners of sociology, to express deep concern about a request Ron Jarmin recently received from the Department of Justice to include a citizenship question on the 2020 Census. We strongly urge you to reject this proposal.

Should such a proposal be favorably received, the integrity of the 2020 Census data will be fundamentally compromised. Including a citizenship question is likely to keep some people from responding to the questionnaire and others from responding truthfully, thereby undermining the accuracy of the data. In addition, there is no longer time to properly test a new question. As you know, creation of the questionnaire is a complex process that requires years of evaluation. With little time left before the 2020 launch, a new question could not be subject to standard rigorous testing, which would further undermine the quality of the data.

Secretary Ross, the import of an accurate census cannot be overstated. You sit in a position from which you can influence the state of our democracy. An accurate census allows policy-makers in public, private, and non-profit sectors to make evidence-based decisions. We implore you to ensure that every effort is made to undertake this process with integrity. Please do not include a citizenship question on the 2020 Census.

Thank you for your thoughtful consideration of this matter.

Sincerely,

Eduardo Bonilla-Silva
President, American Sociological Association

cc: Dr. Ron Jarmin
February 22, 2018

Mr. Eduardo Bonilla-Silva  
President, American Sociological Association  
1430 K Street, NW, Suite 600  
Washington, DC 20005

Dear Mr. Bonilla-Silva:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a full, fair, and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I reported back to Congress last October after I conducted a rigorous deep dive to produce a new 2020 Census lifecycle cost estimate as well as a thorough review of Census programming and financial management. I have assembled a multidisciplinary team to address and remedy concerns expressed by the Government Accountability Office, the Department of Commerce’s Office of the Inspector General, the Office of Management and Budget, and Congressional members. In addition, I have put into place the people, processes, and programs to ensure strong governance and oversight of the 2020 Census.

If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663. Thank you again for your letter. We appreciate your thoughtful input.

Sincerely,

Wilbur Ross
Dr. Ron Jarmin  
US Census Bureau  
4600 Silver Hill Rd.  
Washington DC 20233  

Dear Dr. Jarmin,

As plans are being made to conduct the 2020 Census, it has come to my attention that the Department of Justice is asking to include a question about citizenship status. Several experts have expressed real concern that including such a question could depress census response rates, adding to the cost and accuracy of the census. Terri Ann Lowenthal, a leading expert on census issues, is quoted as saying “I can think of no action the administration could take that would be more damaging to the accuracy of the 2020 census than to add a question on citizenship.” Representatives of the Mexican American Legal Defense Fund and the National Advisory Committee of the Census have both indicated that this seems to be a move to prevent the shifting of Congressional representation from non-Latino states to heavily Latino states. I trust you will work with Commerce Secretary Wilbur Ross to ensure that this discriminatory and expensive attempt to sabotage the census will not be considered.

Thank you for your consideration,

Judi Paradis

Cc: Commerce Secretary Wilbur Ross  
1401 Constitutional Ave NW, Washington DC 20230  

Representative Katherine Clark  
701 Concord Ave #101, Cambridge, MA 02138
January 7, 2018
Wilbur L. Ross, Secretary
U. S. Department of Commerce
1401 Constitution Ave NW
Washington, DC 20230

Dear Secretary Ross:

The GOP is sabotaging this sacred mandate: decennial census.

The Founding Fathers must be spinning in their graves because our federal government is failing to execute one of its most basic constitutional duties: the decennial census.

The decennial census is the country’s largest civilian mobilization. It determines where billions of federal dollars flow each year, and how many congressional and electoral college seats each state gets. The results have enormous influence over the decisions of businesses and local governments, too. It’s mandated by the U.S. Constitution, right there in Article I, Section 2.

Yet despite all the brandishing of pocket Constitutions on the right, the Trump White House and Republican lawmakers are sabotaging this sacred mandate. First they refused to sufficiently fund it. Now they’re taking actions that would severely depress participation.

This raises the prospect that those final, critically important numbers will be – to use one of Trump’s preferred adjectives – WRONG. The census is a few years off the enumeration itself doesn’t happen until 2020, planning begins years in advance.

The Census Bureau must try out questions. It must test-drive technologies – especially important this time around, because for the first time, the questionnaire will be administered primarily online. The bureau must also figure out which community groups can help with public outreach and what kind of messaging will be most effective in getting people to stand up and be counted. This task is especially challenging in an era marked by record distrust of government.

Already, funding shortfalls and administration disorganization have left these efforts woefully behind. A scheduled dress rehearsal for the 2020 count was whittled from three sites to one, in Providence County, Rhode Island.

One goal of such tests is to find ways to maximize participation of “hard-to-count” populations, such as immigrants, the homeless and households below the poverty line. Because these are largely Democratic constituencies, Republicans may shrug at the setbacks they’ve created. But Trump Country is also at risk at being overlooked.

That’s because funding uncertainty forced the Census Bureau to kill its “only opportunities to test, in a real-time, census-like environment, special counting methods for rural areas,” as Vanita Gupta, president of the Leadership Conference on Civil and Human Rights, explained in recent congressional testimony.

Apparently not content to shortchange funding, the administration is also taking steps that will actively decrease participation. As ProPublica first reported, the Justice Department recently sent a letter to the Census Bureau asking it to add a new question to the 2020 form. Adding a question – any question – this late in the game is risky; there’s no time to field-test how people will respond to it.
This particular question is unusually hazardous: It's about citizenship. The Justice Department claims it needs finely grained citizenship data to enforce the Voting Rights Act, a proposition that every census alumnus and civil rights expert has rejected.

Whatever the administration's motives, the main consequence of adding this question is clear: It would spook immigrants (legal or otherwise) and especially Hispanics anxious about how the government might use their data.

In unrelated survey testing last year, respondents fretted about what would happen to information they gave to the Census Bureau. Unprompted, some mentioned the "Muslim ban," "discomfort 'registering' other household members" and fears that immigration authorities would come after them. Some falsified names and dates of birth.

Those survey respondents were paid, too, suggesting they'd be more likely to cooperate than would the general population. The politics have changed everything. Recently," one field representative explained, according to a Census Bureau memo.

In a statement, the bureau said it was still "evaluating" the Justice Department request. Even if the Census Bureau ultimately leaves this question off the form, though, the reputational damage may already be done. Significant undercounts could distort how dollars and congressional seats are divvied up. It is likely (and perhaps not coincidentally) to the advantage of Republicans and their constituencies.

The Constitution requires the decennial census to count all people, not just all citizens. Your department oversees the census, seems to truly want to produce a full, accurate, nonpartisan count, not least because the business sector wants one.

But in an era of data trutherism, Donald Trump's lies, and political tribalism, Republican lawmakers and the rest of the administration appear to have other priorities.

A full, accurate and non-partisan census is critical to the proper functioning of our republic so regardless of your party affiliation or having been appointed by Donald Trump, millions of Americans are counting on you and your department to put politics aside for this very important census.

Sincerely,

[Signature]

Peyton Collier-Kerr
Wilbur L. Ross, Secretary
U. S. Department of Commerce
1401 Constitution Ave NW
Washington, DC 20230

The GOP is sabotaging this sacred mandate: decennial census.
Fwd: Process for vetting questions

Mark G Dorsey (CENSUS/OCIA FED)

Mon 1/8/2018 3:56 PM

To: BOC Correspondence Quality Assurance (CENSUS) <boc.correspondence.quality.assurance@census.gov>;

Please control

Mark Dorsey, Congressional Liaison, Office of Congressional & Intergovernmental Affairs, U.S. Census Bureau
Cell 202.779.1388 mark.g.dorsey@census.gov
census.gov Connect with us on Social Media

Begin forwarded message:

From: "Helling, Erin" <Erin.Helling@mail.house.gov>
Date: January 8, 2018 at 2:50:49 PM EST
To: "cao@census.gov" <cao@census.gov>
Subject: Process for vetting questions

Hi,

I am trying to track down information on the process for vetting questions for the 2020 Census, particularly the DOJ's requested question on immigration status. If you wouldn't mind giving me a call, I would appreciate a quick run down on the process.

Best,
- Erin

---

Erin Helling
Legislative Counsel
Rep. Mike Thompson
231 Cannon House Office Building
202-225-3311

www.mikethompson.house.gov | Sign up for our e-newsletter
Missouri Johnson, Marcellina (Federal)

From: Leach, Macie (Federal)
Sent: Tuesday, January 09, 2018 7:10 PM
To: DOCExecSec
Subject: FW: Proposed Census Citizenship Question

From: Barbara Anderson [mailto:]
Sent: Tuesday, January 09, 2018 3:37 PM
To: Ross, Wilbur (Federal) Jarmin, Ron S Lamas, Enrique
Cc: Andrew A. Samwick; Kathy Pettit; Ken Simonson; Peter W. Glynn; Roberto Rigobon; Sunshine Hillygus; Allison Plyer; Hourcade, Joan Pablo
Subject: Proposed Census Citizenship Question

To: Jeff Sessions, Attorney General
Arthur E. Gary, General Counsel, Justice Management Division

Wilbur Ross, Secretary of Commerce
Ron Jarmin, Performing the Nonexclusive Functions and Duties of the Director
Enrique Lamas, Performing the Nonexclusive Functions and Duties of the Deputy Director and Chief Operating Officer

We are sending this email in response to the letter of December 12, 2017 from Arthur E. Gary of the Department of Justice to the Census Bureau which requested that citizenship be included as an item on the 2020 Census. We are members of the Census Scientific Advisory Committee, a Congressionally-mandated committee which advises the Census Bureau on all scientific matters. We are sending this letter as an expression of our professional opinion as individuals and do not write as representatives of the Census Bureau or of our individual organizations. We include academics, members of the private sector and members of NGOs.

We hold the strong opinion that including citizenship in the 2020 Census would be a serious mistake which would result in a substantial lowering of the response rate. Producing a high quality census with a very high response rate is in the interest of all Americans.

The United States Census has not encountered the problems with a high level of Census refusal that have been a problem in many other high income countries, including Germany. One reason is that in 2010 there were about 250,000 community partners who encouraged people in their communities to respond to the Census. It is expected that there will be a similar number of community partners for the 2020 Census. Adding a citizenship
question to the main Census questionnaire is almost certain to jeopardize the cooperation of at least some
community partners and lead to a lower response rate, hurting the reputation of the Census Bureau. We are
certain you would not like to see these outcomes occur.

Sincerely,

Dr. Barbara A. Anderson

Ronald Freedman Collegiate Professor of Sociology and Population Studies, University of Michigan, Chair
Census Scientific Advisory Committee

Dr. Barbara Buttenfield

Professor of Geography,

University of Colorado

Dr. Peter W. Glynn

Thomas Ford Professor of Engineering
Stanford University

Dr. D. Sunshine Hillygus

Professor of Political Science
Director, Duke Initiative on Survey Methodology
Duke University

Dr. Juan Pablo Hourcade

Associate Professor of Computer Science
University of Iowa

Ms. Kathryn Pettit

Senior Research Associate

Metropolitan Housing and Communities Policy Center
The Urban Institute

Ms. Allison Plyer
Chief Demographer
The Data Center at Nonprofit Knowledge Works

Dr. Roberto Rigobon
Society of Sloan Fellows Professor of Applied Economics
Massachusetts Institute of Technology

Dr. Andrew Samwick
Professor of Economics
Director, The Nelson A. Rockefeller Center
Dartmouth College

Mr. Kenneth D. Simonson
Chief Economist
The Associated General Contractors of America
January 9, 2018

The Honorable Jeff Sessions
Attorney General of the United States
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

Dear Attorney General Sessions:

I write to express my concerns with a letter the Justice Management Division of the Department of Justice mailed to the Census Bureau last month. The letter in question proposed reinstating a citizenship question that has not been a part of the census questionnaire for quite some time. The change was recommended under the guise of voter fraud prevention, but could ultimately have detrimental effects on the 2020 Census.

As the representative for an area known for low response rates, a strong immigrant community, and a history of being undercounted, I worry that this question may have unforeseen consequences on participation in and implementation of the Decennial Census in my district. Reintroducing this question could incite fear among immigrants and potentially deter them from participating. Furthermore, this change would represent a step backward from the recent collaboration between my office, Hidalgo County, and the Census Bureau to address past inaccuracies and better prepare for the Decennial Census. I am also concerned this sudden change could increase the costs of the Census and/or divert much needed funds from efforts intended to improve accuracy.

I am more than willing to support legislation and rules that advance the voting rights and security of Americans, but I truly believe this change would do more harm than good. The reintroduction of this citizenship question is an indirect attack on our immigrant communities, and on historically undercounted communities like those in Hidalgo County. I stand ready to work with the Department of Justice and the Census Bureau to address your concerns, increase participation, and ensure the 2020 Census runs in the best possible way.

Thank you for your attention to this matter. I look forward to hearing from you soon. Please feel free to reach out to me to discuss this matter further at (202) 225-2531.

Sincerely,

Vicente Gonzalez
Member of Congress

CC: Acting Director Ron Jarmin, U.S. Census Bureau
January 10, 2018

The Leadership Conference
on Civil and Human Rights

1620 L Street, NW
Suite 1100
Washington, DC
20036

202.466.3311 voice
202.466.3435 fax
www.civilrights.org

Dear Secretary Ross:

On behalf of The Leadership Conference on Civil and Human Rights, a coalition charged by its diverse membership of more than 200 national organizations to promote and protect the civil and human rights of all persons in the United States, and the undersigned 167 organizations, we urge you to reject the Department of Justice’s untimely and unnecessary request for a new citizenship question on the 2020 Census, which would threaten a fair and accurate decennial census. Adding a new citizenship question to the 2020 Census would destroy any chance for an accurate count, discard years of careful research, and increase costs significantly.

You and your staff have made clear that you share our goal of a full, fair, and accurate census. A fair and accurate census, and the collection of useful, objective data about our nation’s people, housing, economy, and communities generally, are among the most significant civil rights issues facing the country today. Every census since the first enumeration in 1790 has included citizens and non-citizens alike. Adding a new question on citizenship to the 2010 Census undoubtedly would affect response rates, outreach, and advertising strategies, and other important elements of the nation’s largest, most complex peacetime activity, calling into question the results of many years of costly, painstaking research and testing.

Adding a citizenship question to the 2020 Census would disrupt preparations at a pivotal point in the decade, undermining years of research and testing and increasing census costs significantly at a time when Congress has directed a less expensive enumeration. The Justice Department’s request would literally add billions of dollars to the life-cycle cost of this census, without improving accuracy.

Questionnaire design and testing began nearly eight years ago during the 2010 Census. Requiring this new topic this late in the decade would threaten the success of the 2020 Census because robust testing in a census-like environment is essential, given the probable chilling effect of adding these questions to the form. There simply is no time to redesign the census form, craft scientifically sound questions to collect the information the Justice Department requests, and evaluate the impact of this new question on census participation and operations before the census starts, in any responsible way. Given the constitutional requirement to conduct the census in 2020, final planning and preparations for the census would be haphazard, at best, leaving the nation with a deeply flawed foundation for our
democratic ideals, informed decision-making, and prudent allocation of precious taxpayer dollars.

In addition, adding this question would jeopardize the accuracy of the 2020 Census in every state and every community by deterring many people from responding. The question is unnecessarily intrusive and will raise concerns in all households — native- and foreign-born, citizens and non-citizens — about the confidentiality of information provided to the government and how that information might be used. Moreover, there are many mixed status households in the United States, which include members who are both citizens and non-citizens with various legal statuses. Mixed-status and immigrant households will be especially fearful of providing information to the federal government in 2020, given the heightened climate of fear that anti-immigrant rhetoric and policies have created. In short, any effort to determine citizenship through the constitutionally required census would jeopardize the accuracy of the entire count, leaving public, private, and nonprofit decision-makers with bad information for all purposes, for the next 10 years. Further, such an effort is likely to shake public confidence in the narrow (though vital) statistical objectives of the Census Bureau’s work, damaging ongoing data collection efforts well into the future.

Finally, in addition to being untimely, the request is unnecessary. The Justice Department has never needed to add this new question to the decennial census to enforce the Voting Rights Act before, so there is no reason it would need to do so now. Contrary to the Justice Department’s letter, the Census Bureau has not included a citizenship question on the modern census “short form,” sent to every household. In fact, no such question has appeared on the census “short form” since enactment of the Voting Rights Act in 1965. Estimates of the citizen voting-age population derived from the ongoing American Community Survey, and the so-called census “long” or sample form before that, have been and continue to be suitable for purposes of civil rights and Voting Rights Act enforcement. Whether utilizing such data for Section 2 enforcement actions, Section 203 determinations, or other voting rights enforcement efforts, courts and the Justice Department have accepted census data as currently collected since enactment of the Voting Rights Act. Given these plain facts, the entire justification for the request should be viewed skeptically as an attempt to throw a wrench into final planning and preparations for an enumeration that already faces enormous challenges, including inadequate and delayed funding, cyber-security risks, and a climate of fear fanned by anti-immigrant rhetoric.

For these reasons, we urge you to reject the Justice Department’s request to add a citizenship question to the 2020 Census. If you have any questions about these comments, please contact Leadership Conference Census Task Force Co-chairs Terry Ao Minnis, Asian Americans Advancing Justice|AAJC, at 202-296-2300 x0127, or Arturo Vargas, NALEO Educational Fund, at 213-747-7606, or Chris Harley, Census Campaign Director at 202-466-3311.

Sincerely,

The Leadership Conference on Civil and Human Rights
18MillionRising.org
ACCESS
ACLU
Advancement Project California
Alliance for Strong Families and Communities
American Association of University Women (AAUW)
American Educational Research Association
American Federation of State, County and Municipal Employees (AFSCME)
American Federation of Teachers
American Library Association
American Sociological Association
American Statistical Association
American-Arab Anti-Discrimination Committee
APACEvotes
Arab American Institute
Arkansas Advocates for Children and Families
Asian & Pacific Islander American Health Forum
Asian American Legal Defense and Education Fund (AALDEF)
Asian Americans Advancing Justice - AAJC
Asian Americans Advancing Justice - Asian Law Caucus
Asian Americans Advancing Justice - Atlanta
Asian and Pacific Islander American Vote
Asian Counseling and Referral Service
Asian Pacific Islander Americans for Civic Empowerment (APACE)
Association of Population Centers
Association of Public Data Users
Autistic Self Advocacy Network
Black Women's Roundtable
Black Youth Vote!
Bread for the World
Brennan Center for Justice
California Calls
Campaign Legal Center
Casa de Esperanza: National Latin@ Network for Healthy Families and Communities
Casa Latina
Center for American Progress
Center for Law and Social Policy (CLASP)
CenterLink: The Community of LGBT Centers
Children Now
Children's Advocacy Alliance
Church World Service
Claritas
Coalition for Disability Health Equity
Coalition on Human Needs
Common Cause
Congregation Beth Shalom
Congregation of Our Lady of Charity of the Good Shepherd, US Provinces
Consortium of Social Science Associations
Council for Community and Economic Research
Council of Professional Associations on Federal Statistics
Council on American-Islamic Relations (CAIR)
Council on American-Islamic Relations, California
Defending Rights & Dissent
Detention Watch Network
Education Law Center-PA
Emgage Foundation
Empowering Pacific Islander Communities
Equal Justice Society
Equality California
Faith in Public Life
Family Equality Council
Farmworker Justice
FORGE, Inc.
Franciscan Action Network
Friends Committee on National Legislation
Friends of the Earth US
Government Accountability Project
Government Information Watch
Hispanic Federation
Human Rights Campaign
Human Rights Watch
In the Public Interest
Indivisible
Insights Association
Interfaith Worker Justice
Irish Immigration Center of Philadelphia
Irish International Immigrant Center
Islamic Society of North America, Office for Interfaith and Community Alliances
Jacobs Institute of Women's Health
Japanese American Citizens League
KIDS COUNT in Delaware
Lambda Legal
Latinfootnote PRLDEF
League of United Latin American Citizens
League of Women Voters of the United States
Legal Aid at Work
Los Angeles LGBT Center
Maine Children's Alliance
MALDEF
Massachusetts Voter Table
Mi Familia Vota
Muslim Justice League
NAACP
NAACP Legal Defense & Educational Fund, Inc.
NALEO Educational Fund
National Advocacy Center of the Sisters of the Good Shepherd
National Alliance for Partnerships in Equity (NAPE)
National Association of Social Workers
National CAPACD
National Center for Lesbian Rights
National Center for Transgender Equality
National Coalition on Black Civic Participation
National Council of Asian Pacific Americans (NCAPA)
National Council of Jewish Women
National Council on Independent Living
National Disability Rights Network
National Education Association
National Employment Law Project
National Health Law Program
National Immigrant Justice Center
National Immigration Law Center
National Institute for Latino Policy (NiLP)
National Justice for Our Neighbors
National Korean American Service & Education Consortium (NAKASEC)
National Latina Institute for Reproductive Health
National Latina/o Psychological Association
National LGBTQ Task Force Action Fund
National Low Income Housing Coalition
National Network for Arab American Communities
National Partnership for Women & Families
National Youth Employment Coalition
Natural Resources Defense Council
NC Child
NC Counts Coalition
Neighborhood Action Coalition
NETWORK Lobby for Catholic Social Justice
New Mexico Voices for Children
Northern California Grantmakers
OCA - Asian Pacific American Advocates
OneAmerica
OpenTheGovernment
People For the American Way
PFLAG National
PICO California
Pierce County Labor Community Services Agency
Planned Parenthood Federation of America
PolicyLink
Population Association of America
Presente.org
Prison Policy Initiative
Public Citizen
Research Advisory Services, Inc.
Senior Executives Association
Service Employees International Union (SEIU)
Sikh Coalition
SiX Action
Society of American Archivists
Southeast Michigan Census Council
Southern California Grantmakers
Southern Coalition for Social Justice
Southern Echo Inc.
State Voices
Sunlight Foundation
The Children's Partnership
The United Methodist Church - General Board of Church and Society
The Voter Participation Center
UnidosUS (formerly NCLR)
Union for Reform Judaism
Union of Concerned Scientists
 Voces Verdes
Voices for Progress
Voices for Vermont's Children
Voto Latino
Wallingford Indivisible
Washington Immigrant Solidarity Network
Win/Win Network
Women's Voices Women Vote Action Fund
February 22, 2018

Ms. Terry Ao Minnis
Co-Chair, Leadership Conference Census Task Force
The Leadership Conference on Civil and Human Rights
1620 L Street, NW, Suite 1100
Washington, DC 20036

Dear Ms. Minnis:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a full, fair, and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I reported back to Congress last October after I conducted a rigorous deep dive to produce a new 2020 Census lifecycle cost estimate as well as a thorough review of Census programming and financial management. I have assembled a multidisciplinary team to address and remedy concerns expressed by the Government Accountability Office, the Department of Commerce’s Office of the Inspector General, the Office of Management and Budget, and Congressional members. In addition, I have put into place the people, processes, and programs to ensure strong governance and oversight of the 2020 Census.

If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663. Thank you again for your letter. We appreciate your thoughtful input.

Sincerely,

Wilbur Ross

Wilbur Ross
February 22, 2018

Mr. Arturo Vargas
Co-Chair, Leadership Conference Census Task Force
The Leadership Conference on Civil and Human Rights
1620 L Street, NW, Suite 1100
Washington, DC 20036

Dear Mr. Vargas:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663. Thank you again for your letter. We appreciate your thoughtful input.

Sincerely,

Wilbur Ross

Wilbur Ross
January 11, 2018

Honorable Wilbur L. Ross  
Secretary of Commerce  
U.S. Department of Commerce  
1401 Constitution Avenue NW  
Washington, DC 20230

Dear Secretary Ross:

We write as the co-chairs of Michigan’s Nonprofit Complete Count Committee, a coalition of more than 40 diverse state organizations to ensure Michigan gets a complete and accurate count in the 2020 census. On behalf of this broad coalition, we urge you to reject the request in the December 12, 2017 letter from the Department of Justice to Acting Census Director Ron Jarmin, to add a new citizenship question on the 2020 Census.

We are concerned that adding a new and untested question to the 2020 Census would disrupt preparations at a pivotal point in the process, undermine years of costly, painstaking research and testing, and increase census costs significantly at a time when Congress has directed a less expensive enumeration. All of these factors would threaten a fair and accurate decennial census.

With census preparations significantly behind schedule and the final dress rehearsal in a month, there is simply no time left to redesign the census form and rigorously test the proposed additional questions. Even small changes in the question order and wording can significantly affect both the rate and accuracy of responses.

We are also concerned that adding this new question will result in taxpayers spending significantly more for a government undertaking that we know in advance would not be successful. Your recent oral testimony before Congress acknowledged that the Census Bureau will need billions of dollars more than originally estimated to conduct a modern, inclusive census. The Justice Department’s proposal to add a new citizenship question would increase census costs even further while decreasing accuracy, because self-response rates are certain to plummet, which in turn will require additional, costly door-to-door visits that still may not spur cooperation or result in accurate responses.

Finally, this new proposed question will raise concerns in all households - native and foreign born, citizens and noncitizens - about the confidentiality of information provided to the government and how government authorities might use that information. Asking every household and every person in the country about their citizenship status in the current political environment - when there is no legal basis or need for doing so - will no doubt give many people pause about participating in the census altogether and will have a chilling effect on immigrant and minority populations who may be hesitant to respond.
January 11, 2018
Page 2 of 2

We know you appreciate that the stakes of a fair and accurate census are high and everyone will have to live with any flawed results for the next 10 years. We look forward to working with you and your staff to ensure a cost-effective, secure, and above all, accurate and inclusive census in every one of the nation’s communities. If you have any questions, please contact any of us or Joan Gustafson, Michigan Nonprofit Association’s external affairs officer, at (517) 230-8110 or jgustafson@mnaonline.org.

Thank you for your consideration of this request.

Sincerely,

[Signature]

Donna Murray-Brown
President and CEO
Michigan Nonprofit Association

[Signature]

Hassan Jaber
Chief Executive Officer, ACCESS
Member, National Advisory Committee, U.S. Census Bureau

[Signature]

Rob Collier
President and CEO
Council of Michigan Foundations

Cc: Acting Deputy Secretary and Under Secretary for Economic Affairs Karen Dunn Kelley
    Acting Census Director Ron Jarmin
February 22, 2018

Ms. Donna Murray-Brown
President and Chief Executive Officer
Michigan Nonprofit Association
330 Marshall Street, Suite 200
Lansing, MI 48912

Dear Ms. Murray-Brown:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a full, fair, and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I reported back to Congress last October after I conducted a rigorous deep dive to produce a new 2020 Census lifecycle cost estimate as well as a thorough review of Census programming and financial management. I have assembled a multidisciplinary team to address and remedy concerns expressed by the Government Accountability Office, the Department of Commerce’s Office of the Inspector General, the Office of Management and Budget, and Congressional members. In addition, I have put into place the people, processes, and programs to ensure strong governance and oversight of the 2020 Census.

If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663. Thank you again for your letter. We appreciate your thoughtful input.

Sincerely,

Wilbur Ross

Wilbur Ross
February 22, 2018

Mr. Hassan Jaber
Chief Executive Officer, ACCESS
Member, National Advisory Committee
Michigan Nonprofit Association
330 Marshall Street, Suite 200
Lansing, MI 48912

Dear Mr. Jaber:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a full, fair, and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I reported back to Congress last October after I conducted a rigorous deep dive to produce a new 2020 Census lifecycle cost estimate as well as a thorough review of Census programming and financial management. I have assembled a multidisciplinary team to address and remedy concerns expressed by the Government Accountability Office, the Department of Commerce’s Office of the Inspector General, the Office of Management and Budget, and Congressional members. In addition, I have put into place the people, processes, and programs to ensure strong governance and oversight of the 2020 Census.

If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663. Thank you again for your letter. We appreciate your thoughtful input.

Sincerely,

Wilbur Ross

Wilbur Ross
February 22, 2018

Mr. Rob Collier
President and Chief Executive Officer
Council of Michigan Foundations
Michigan Nonprofit Association
330 Marshall Street, Suite 200
Lansing, MI 48912

Dear Mr. Collier:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a full, fair, and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I reported back to Congress last October after I conducted a rigorous deep dive to produce a new 2020 Census lifecycle cost estimate as well as a thorough review of Census programming and financial management. I have assembled a multidisciplinary team to address and remedy concerns expressed by the Government Accountability Office, the Department of Commerce’s Office of the Inspector General, the Office of Management and Budget, and Congressional members. In addition, I have put into place the people, processes, and programs to ensure strong governance and oversight of the 2020 Census.

If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663. Thank you again for your letter. We appreciate your thoughtful input.

Sincerely,

Wilbur Ross
January 11, 2018

The Honorable Wilbur Ross  
Secretary  
Department of Commerce  
1401 Constitution Avenue, NW  
Washington, DC 20230

Dear Secretary Ross,

As follow up to our recent conversations about the 2020 Decennial Census, we are writing to express our opposition to the inclusion of any questions related to citizenship, immigration status or place of birth on the 2020 Decennial Census questionnaire.

While it is critical to have data on the immigrant population in the United States, there are already ten Census Bureau surveys that collect this information, including the highly accurate American Community Survey, previously known as the ‘long-form’ census. Seven of these surveys specifically collect information on citizenship.

Asking about citizenship, immigration status or place of birth on the 2020 Census will not add to our understanding of the immigrant or foreign-born population in the United States, but it will almost certainly result in a lower participation rate among hard-to-count populations, falsified responses and skewed results. Respondents are likely to assume the data will be shared with immigration agencies. Legal residents may be unwilling to provide information about non-citizens residing in their home. We feel strongly that asking for this information in the Decennial Census, which is used for apportionment of Congressional districts, will serve primarily to suppress immigrant response to the Census.

Furthermore, we are concerned about the cost of asking an additional question. The increase in non-response follow-up costs resulting from a question that discourages participation may be massive. Adding a new question will also cost significantly more to administer, process and tabulate – all to learn more about a subject covered in ten other surveys and not required for congressional apportionment purposes. It is also too late to test a new question during the 2018 End-to-End test, making it impossible to fully understand the impact of adding a new question at this late date.
We are confident that you share our determination to make the Decennial Census as accurate and cost effective as possible and to avoid even the appearance of political motivation. Thank you for your consideration.

Sincerely,

Senator Jeanne Shaheen  
Ranking Member  
Appropriations Subcommittee on Commerce, Justice, Science and Related Agencies

Senator Claire McCaskill  
Ranking Member  
Committee on Homeland Security and Government Affairs
February 22, 2018

The Honorable Jeanne Shaheen
United States Senate
Washington, DC 20510

Dear Senator Shaheen:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a full, fair, and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I reported back to Congress last October after I conducted a rigorous deep dive to produce a new 2020 Census lifecycle cost estimate as well as a thorough review of Census programming and financial management. I have assembled a multidisciplinary team to address and remedy concerns expressed by the Government Accountability Office, the Department of Commerce’s Office of the Inspector General, the Office of Management and Budget, and Congressional members. In addition, I have put into place the people, processes, and programs to ensure strong governance and oversight of the 2020 Census.

We will keep you apprised of any developments regarding the citizenship question. If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross

Wilbur Ross
February 22, 2018

The Honorable Claire McCaskill
United States Senate
Washington, DC 20510

Dear Senator McCaskill:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a full, fair, and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I reported back to Congress last October after I conducted a rigorous deep dive to produce a new 2020 Census lifecycle cost estimate as well as a thorough review of Census programming and financial management. I have assembled a multidisciplinary team to address and remedy concerns expressed by the Government Accountability Office, the Department of Commerce’s Office of the Inspector General, the Office of Management and Budget, and Congressional members. In addition, I have put into place the people, processes, and programs to ensure strong governance and oversight of the 2020 Census.

We will keep you apprised of any developments regarding the citizenship question. If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross

[Signature]
Eli Effinger-Weintraub

January 12, 2018

Secretary Wilbur Ross
U.S. Department of Commerce
1401 Constitution Ave NW
Washington, DC 20230

Dear Secretary Ross,

I am writing to express my opposition to the proposal that the 2020 Census include a question on citizenship. I am especially concerned that the fear this question will raise in today's anti-immigrant climate will lead to a significant increase in non-participation, which will, in turn, result in an inaccurate count and an inaccurate apportionment of Congressional Districts. As a government representative, I'm sure you share my concern that we must work to preserve our democracy. Part of that job is assuring that districts are fairly drawn and that all people are counted and represented.

Sincerely,

Eli Effinger-Weintraub
The Honorable Wilbur Ross  
Secretary  
U.S. Department of Commerce  
Room 5421  
Fourteenth Street and Constitution Avenue, NW  
Washington, DC 20230

Dear Secretary Ross:

We write to strongly oppose the Department of Justice’s (DOJ) request to add a citizenship question to the 2020 Census. General Counsel Arthur Gary’s December 12th letter claims that the addition of a citizenship question is needed to enforce Section 2 of the Voting Rights Act (VRA) in order to protect against racial discrimination in voting. The addition of a citizenship question only serves to instill fear among immigrant communities, decrease participation and negatively impact the outcome and accuracy of the 2020 Census.

The U.S. Census is completed every ten years to collect data that accurately reflects the total United States population, regardless of citizenship. Census questions undergo years of extensive review, including field testing and feedback from focus groups. Adding an untested question could seriously impair the Bureau’s ability to produce an accurate population count and result in increased costs to the Census.

DOJ’s claims that the citizenship question is needed to enforce Section 2 of the VRA and to prevent racial discrimination in voting are unfounded. The Census Bureau already collects information on citizenship through the American Community Survey (ACS). This ongoing yearly survey provides more detailed information than the decennial Census, which enables the Census to focus more on population counts. The ACS’s reliable citizenship data was used in 2010 by both DOJ and civil rights groups to monitor compliance with the VRA and will once again be utilized for the same purpose in 2020.

The Trump administration’s immigration policies have already instilled fear among immigrant communities. Immigrant communities are less likely to report crimes, or even enroll their eligible U.S. citizen children in healthcare programs. Additionally, early surveys have documented that some immigrants are afraid to provide information to Census employees because they are fearful of how the information may be used. This is a concerning trend and would no doubt be worsened if a citizenship question was included in the 2020 Census.

We urge you to oppose the DOJ’s request for a citizenship question in the 2020 Census. As you work to ensure a fair and accurate census that encourages full participation, we believe that including a citizenship question would only serve to suppress participation and result in inaccurate data that does not truly reflect the makeup of our nation.
Thank you in advance for your attention to this critical issue.

Sincerely,

[Signatures]

Darren Soto
CHC Civil Rights and Voting Rights Chair

Luis V. Gutiérrez

Grace F. Napolitano

Lucille Roybal-Allard

Adriano Espaillat

Tony Cardenas

Ben Ray Luján

Juan Vargas

Norma Torres

Michelle Lujan Grisham
CHC Chair

José F. Serrano

Salud O. Carbajal

Albio Sires

J. Luis Correa

Jimmy Gomez

Linda T. Sánchez

Ruben Gallego

Nanette Diaz Barragán
Gregorio Kilili Camacho Sablan
February 22, 2018

The Honorable Darren Soto
U.S. House of Representatives
Washington, DC 20515

Dear Representative Soto:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a full, fair, and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I reported back to Congress last October after I conducted a rigorous deep dive to produce a new 2020 Census lifecycle cost estimate as well as a thorough review of Census programming and financial management. I have assembled a multidisciplinary team to address and remedy concerns expressed by the Government Accountability Office, the Department of Commerce’s Office of the Inspector General, the Office of Management and Budget, and Congressional members. In addition, I have put into place the people, processes, and programs to ensure strong governance and oversight of the 2020 Census.

We will keep you apprised of any developments regarding the citizenship question. If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross

[Signature]
February 22, 2018

The Honorable Michelle Lujan Grisham  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Lujan Grisham:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Luis Gutierrez  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Gutierrez:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable José E. Serrano  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Serrano:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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We will keep you apprised of any developments regarding the citizenship question. If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Grace Napolitano
U.S. House of Representatives
Washington, DC 20515

Dear Representative Napolitano:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Salud Carbajal  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Carbajal:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Lucille Roybal-Allard
U.S. House of Representatives
Washington, DC 20515

Dear Representative Roybal-Allard:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Albio Sires  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Sires:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Adriano Espaillat
U.S. House of Representatives
Washington, DC 20515

Dear Representative Espaillat:

Thank you for your recent letter regarding the Department of Justice's request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice's request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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Sincerely,

Wilbur Ross

[Signature]
February 22, 2018

The Honorable J. Luis Correa
U.S. House of Representatives
Washington, DC 20515

Dear Representative Correa:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Tony Cárdenas
U.S. House of Representatives
Washington, DC 20515

Dear Representative Cárdenas:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Jimmy Gomez  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Gomez:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Ben Ray Luján  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Luján:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross

000831
February 22, 2018

The Honorable Linda Sánchez  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Sánchez:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross

Wilbur Ross
February 22, 2018

The Honorable Juan Vargas
U.S. House of Representatives
Washington, DC 20515

Dear Representative Vargas:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Ruben Gallego
U.S. House of Representatives
Washington, DC 20515

Dear Representative Gallego:

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Norma Torres
U.S. House of Representatives
Washington, DC 20515

Dear Representative Torres:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Nanette Diaz Barragán
U.S. House of Representatives
Washington, DC 20515

Dear Representative Barragán:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross

000836
February 22, 2018

The Honorable Gregorio Kilili Camacho Sablan  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Sablan:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross

[Signature]
January 16, 2018

The Honorable Wilbur Ross
Secretary
United States Department of Commerce
1401 Constitution Avenue NW
Washington, D.C. 20230

Dear Secretary Ross:

I am writing to express my concerns about the preparations that the Department of Commerce (the Department) and the Census Bureau (the Bureau) are taking in advance of the 2020 Decennial Census for populations in remote rural and hard-to-count areas based on reports in a December 9, 2017 New York Times article entitled With 2020 Census Looming, Worries About Fairness and Accuracy. I am worried that based on this article and other news reports that rural and geographically challenged areas, such as West Virginia and the Appalachian region, will not be appropriately and accurately enumerated.

According to the New York Times article, due to budget cuts, the Department cancelled testing in Bluefield, West Virginia that would have better informed how to develop accurate population counts in hard-to-count and remote rural areas. The article also goes on to state that the Bureau plans to use information from the United States Postal Service, satellite imagery and online surveys to make up for the labor-intensive work of going from door-to-door to gather data and ensure the Bureau is using an accurate list of addresses for the 2020 Census. I was alarmed to learn that only 30% of the country would be visited by enumerators in order to gather this information and it is unclear which areas are included in this 30% or the threshold that was used to come to this percentage.

I also understand that the Census is largely intended to be completed online and only certain areas will receive paper questionnaires during the first round of the Census data collection. Given the remoteness of my state’s rural population, the lack of broadband access across the state, and the prevailing concern by some of my constituents that the government is asking intrusive questions, I am apprehensive about these alternate more hands-off methodologies and their ability to work for my constituents. Moreover, the Department and the Bureau’s emphasis and reliance on the internet for collecting most of their Census data is troubling and seems to ignore the Digital Divide in this country. Nearly 30 percent of West Virginians are without access to broadband which means over 500,000 West Virginians would be at risk for not being counted accurately in the Census.

While I recognize that relying on technology and the internet is a more cost effective way to gather as much information as possible, I fear that in an attempt to save money, the Bureau may

miss out counting segments of the population by not deploying more trusted local enumerators to areas to collect data. I understand how vital of a role the Census plays in the United States and which is why I am requesting that the Bureau reconsider its proposed approach to collecting the data in order to make the 2020 Decennial Census a meaningful one for the entire country, including West Virginia. I also request your response to the following questions:

- Which areas are included in the 30% of the country that will be visited by enumerators to determine accurate addresses and how are these areas chosen?
- With the Administration's recent request for additional funds, does the Department intend to reinstate rural testing in West Virginia before the 2020 Census?
- What assurances can you provide that the counts in West Virginia will be accurate?

I share your desire for a cost-effective Census but I believe it is imperative that we ensure all populations, especially remote rural ones, are accurately counted. I look forward to your response to my questions and stand ready to assist you and the Department in order to make sure rural America is fully included in the 2020 Decennial Census.

Sincerely,

Joe Manchin III
United States Senator
January 17, 2018

The Honorable Wilbur Ross
Secretary
Department of Commerce
1401 Constitution Ave., NW
Washington, DC 20230

Dear Secretary Ross:

We write to express our deep concern about the Justice Department’s request to include questions about citizenship status in the next census. The U.S. Census is critical to ensuring that our democracy is truly representative and to gathering data that guides federal funding. The inclusion of citizenship questions will deter responses to the census, especially among minority, immigrant, and low-income communities. We strongly urge you to reject efforts to insert questions in the 2020 Census that focus on citizenship status.

The inclusion of citizenship questions in the census will suppress responses from minority communities who will fear reprisal against themselves or loved ones from revealing citizenship details. As the Leadership Conference Education Fund recently observed, “Asking about citizenship status in the 2020 Census…will have a chilling effect and keep many residents from responding, jeopardizing the accuracy” of the census. As it is, according to the Census Bureau, 1.5 percent of the Hispanic population and 2.1 percent of the African-American population were not included in the last census in 2010. Including questions like this will only further depress the response rate. In fact, in an amicus curiae brief in Evenwel v. Abbott, four former directors of the U.S. Census Bureau noted that asking about citizenship status “would likely exacerbate privacy concerns and lead to more inaccurate responses from non-citizens worried about a government record of their immigration status…invariably lead[ing] to a lower response rate to the Census in general…”

Moreover, a September 2017 memo by the U.S. Census’ Center for Survey Measurement (CSM) flagged concerns about undercounting in the 2020 Census. In interviews with 366 individuals beginning in 2017, CSM staff reported facing a “new phenomenon” encountering high numbers of people expressing confidentiality concerns and reluctance to participate. Many individuals cited the Muslim ban, harsh immigration policies, and the current political climate as deterrents from participating. This is particularly concerning given that CSM respondents are paid a cash incentive for their participation in surveys and are interviewed by researchers with whom they have an established relationship. It is clear that individuals are

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4. Id.


already reluctant to complete a paid survey with someone they know. How can we expect the general public to complete a census that includes questions which will only keep them from responding?

The resulting undercount will reverberate across the nation: from ensuring a fair distribution of congressional seats based on the census data to making certain that an accurate allocation of nearly $700 billion taxpayer funds\(^7\) for critical programs is made. These include programs like Medicaid ($311 billion), SNAP ($71 billion) and Pell Grants ($29.9 billion), highway planning and construction ($38 billion), Federal Transit Formula Grants ($5 billion) and Career and Technical Education Grants ($1.1 billion). Industry and businesses also rely on census data to determine where services and investments in communities will be made.

In testimony before a House Oversight and Government Reform Committee hearing in October 2017 you pledged that “[a]n efficient 2020 Census that provides a full, fair and accurate count has been one of my highest priorities since being confirmed in February… The census is the bedrock upon which we construct our system of democratic representation.”\(^8\) We know you understand the important role the census plays in our democracy, and we hope that you will push back against any efforts to politicize the census process.

The Census Bureau has engaged in efforts for decades to build trust with under-counted communities, including communities of color and the rural poor, and build capacity among community organizations to maximize participation. During the 2010 Census, public and private investment built capacity among community leaders and strengthened the infrastructure among community organizations.\(^9\) All these efforts stand to be reversed should the census become politicized.

In April 2018, you will be sharing a list of questions for the next census with Congress. We strongly urge you not to include any questions relating to citizenship status such as the ones the Justice Department is requesting. In addition to the problems described above, the inclusion of such a question so late in the process will not allow for necessary testing to correct wording problems. Moreover, such an action will impede a fair, accurate and efficient national count. We must do everything we can to ensure maximum participation the 2020 Census.

Sincerely,

\[\text{[Signatures]}\]

PRAMILA JAYAPAL
Member of Congress

RAUL M. GRIJALVA
Member of Congress

JUDY CHU
Member of Congress

CEDRIC L. RICHMOND
Member of Congress

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MICHELLE LUJAN GRISHAM
Member of Congress

ELEANOR HOLMES NORTON
Member of Congress

ALCEE HASTINGS
Member of Congress

BOBBY RUSH
Member of Congress

LUCILLE ROYBAL-ALLARD
Member of Congress

NYDIA M. VELÁZQUEZ
Member of Congress

SHEILA JACKSON LEE
Member of Congress

DANNY DAVIS
Member of Congress

GREGORY MECKS
Member of Congress

BARBARA LEE
Member of Congress

JIM COSTA
Member of Congress

AL GREEN
Member of Congress

DORIS O. MATSU
Member of Congress

ALBIO Sires
Member of Congress
PETE AGUILAR
Member of Congress

NANETTE BARRAGÁN
Member of Congress

LUIS J. CORREA
Member of Congress

SALUD CARBAJAL
Member of Congress

TED LIEU
Member of Congress

LISA BLUNT ROCHESTER
Member of Congress

ANTHONY BROWN
Member of Congress

ADRIANO ESPAILLAT
Member of Congress

VINCENTE GONZALEZ
Member of Congress

RO KHANNA
Member of Congress

A. DONALD MCEACHIN
Member of Congress

JIMMY GOMEZ
Member of Congress

DARREN SOTO
Member of Congress

BRENDA LAWRENCE
Member of Congress
JOHN LEWIS  
Member of Congress

EMANUEL CLEAVER  
Member of Congress

Gwen Moore  
Member of Congress

Eddie Bernice Johnson  
Member of Congress

Grace F. Napolitano  
Member of Congress

Wm. Lacy Clay  
Member of Congress

Hakeem S. Jeffries  
Member of Congress

Bonnie Watson Coleman  
Member of Congress

Henry C. "Hank" Johnson, Jr  
Member of Congress

BEN RAY Lujan  
Member of Congress

Jose E. Serrano  
Member of Congress

Robert C. "Bobby" Scott  
Member of Congress

Carolyn B. Maloney  
Member of Congress
FREDERICA S. WILSON
Member of Congress
February 22, 2018

The Honorable Pramila Jayapal
U.S. House of Representatives
Washington, DC 20515

Dear Representative Jayapal:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a full, fair, and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I reported back to Congress last October after I conducted a rigorous deep dive to produce a new 2020 Census lifecycle cost estimate as well as a thorough review of Census programming and financial management. I have assembled a multidisciplinary team to address and remedy concerns expressed by the Government Accountability Office, the Department of Commerce’s Office of the Inspector General, the Office of Management and Budget, and Congressional members. In addition, I have put into place the people, processes, and programs to ensure strong governance and oversight of the 2020 Census.

We will keep you apprised of any developments regarding the citizenship question. If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Raul Grijalva
U.S. House of Representatives
Washington, DC 20515

Dear Representative Grijalva:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Judy Chu  
U.S. House of Representatives  
Washington, DC  20515

Dear Representative Chu:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Cedric Richmond
U.S. House of Representatives
Washington, DC 20515

Dear Representative Richmond:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Michelle Lujan Grisham
U.S. House of Representatives
Washington, DC 20515

Dear Representative Grisham:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Eleanor Holmes Norton
U.S. House of Representatives
Washington, DC 20515

Dear Representative Holmes Norton:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Alcee Hastings  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Hastings:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Bobby Rush
U.S. House of Representatives
Washington, DC 20515

Dear Representative Rush:

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Lucille Roybal-Allard
U.S. House of Representatives
Washington, DC 20515

Dear Representative Roybal-Allard:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Nydia Velazquez
U.S. House of Representatives
Washington, DC 20515

Dear Representative Velazquez:

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Sheila Jackson Lee
U.S. House of Representatives
Washington, DC 20515

Dear Representative Jackson Lee:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Danny Davis  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Davis:

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Gregory Meeks
U.S. House of Representatives
Washington, DC 20515

Dear Representative Meeks:

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Barbara Lee  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Lee:

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Jim Costa
U.S. House of Representatives
Washington, DC 20515

Dear Representative Costa:

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Al Green
U.S. House of Representatives
Washington, DC 20515

Dear Representative Green:

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Doris Matsui
U.S. House of Representatives
Washington, DC 20515

Dear Representative Matsui:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Albio Sires  
U.S. House of Representatives  
Washington, DC  20515  

Dear Representative Sires:

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Pete Aguilar  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Aguilar:

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Ted Lieu  
U.S. House of Representatives  
Washington, DC 20515  

Dear Representative Lieu:

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Nanette Barragan
U.S. House of Representatives
Washington, DC 20515

Dear Representative Barragan:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Lisa Blunt Rochester
U.S. House of Representatives
Washington, DC 20515

Dear Representative Blunt Rochester:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a full, fair, and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I reported back to Congress last October after I conducted a rigorous deep dive to produce a new 2020 Census lifecycle cost estimate as well as a thorough review of Census programming and financial management. I have assembled a multidisciplinary team to address and remedy concerns expressed by the Government Accountability Office, the Department of Commerce’s Office of the Inspector General, the Office of Management and Budget, and Congressional members. In addition, I have put into place the people, processes, and programs to ensure strong governance and oversight of the 2020 Census.

We will keep you apprised of any developments regarding the citizenship question. If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Luis Correa  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Correa:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Anthony Brown  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Brown:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Salud Carbajal
U.S. House of Representatives
Washington, DC 20515

Dear Representative Carbajal:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Adriano Espaillat
U.S. House of Representatives
Washington, DC 20515

Dear Representative Espaillat:

Thank you for your recent letter regarding the Department of Justice's request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice's request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Vicente Gonzalez
U.S. House of Representatives
Washington, DC 20515

Dear Representative Gonzalez:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Ro Khanna  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Khanna:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable A. Donald McEachin  
U.S. House of Representatives  
Washington, DC  20515

Dear Representative McEachin:

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Jimmy Gomez
U.S. House of Representatives
Washington, DC 20515

Dear Representative Gomez:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Darren Soto
U.S. House of Representatives
Washington, DC 20515

Dear Representative Soto:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Brenda Lawrence  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Lawrence:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross

[Signature]
February 22, 2018

The Honorable Yvette Clarke
U.S. House of Representatives
Washington, DC 20515

Dear Representative Clarke:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Keith Ellison  
U.S. House of Representatives  
Washington, DC 20515  

Dear Representative Ellison:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Marcia Fudge  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Fudge:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross

Wilbur Ross
February 22, 2018

The Honorable Karen Bass  
U.S. House of Representatives  
Washington, DC 20515  

Dear Representative Bass:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross

000882
February 22, 2018

The Honorable Colleen Hanabusa  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Hanabusa:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Tony Cardenas
U.S. House of Representatives
Washington, DC 20515

Dear Representative Cardenas:

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Grace Meng
U.S. House of Representatives
Washington, DC 20515

Dear Representative Meng:

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Mark Pocan
U.S. House of Representatives
Washington, DC 20515

Dear Representative Pocan:

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Mark Takano
U.S. House of Representatives
Washington, DC 20515

Dear Representative Takano:

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Sincerely,

Wilbur Ross

000887
February 22, 2018

The Honorable Juan Vargas  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Vargas:

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Marc Veasey
U.S. House of Representatives
Washington, DC 20515

Dear Representative Veasey:

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We will keep you apprised of any developments regarding the citizenship question. If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Filemon Vela
U.S. House of Representatives
Washington, DC 20515

Dear Representative Vela:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Robin Kelly  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Kelly:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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Sincerely,

Wilbur Ross

[Signature]
February 22, 2018

The Honorable Katherine Clark
U.S. House of Representatives
Washington, DC 20515

Dear Representative Clark:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable John Lewis
U.S. House of Representatives
Washington, DC 20515

Dear Representative Lewis:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Gwen Moore  
U.S. House of Representatives  
Washington, DC  20515

Dear Representative Moore:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Emanuel Cleaver  
U.S. House of Representatives  
Washington, DC 20515  

Dear Representative Cleaver:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Eddie Bernice Johnson  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Johnson:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Grace Napolitano  
U.S. House of Representatives  
Washington, DC  20515

Dear Representative Napolitano:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Wm. Lacy Clay  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Clay:

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Terri Sewell
U.S. House of Representatives
Washington, DC 20515

Dear Representative Sewell:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Hakeem Jeffries
U.S. House of Representatives
Washington, DC 20515

Dear Representative Jeffries:

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Sincerely,

Wilbur Ross

Wilbur Ross
February 22, 2018

The Honorable Bonnie Watson Coleman  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Watson Coleman:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Henry “Hank” Johnson, Jr.
U.S. House of Representatives
Washington, DC 20515

Dear Representative Johnson:

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Ben Ray Lujan  
U.S. House of Representatives  
Washington, DC 20515  

Dear Representative Lujan:

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Jose Serrano
U.S. House of Representatives
Washington, DC 20515

Dear Representative Serrano:

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Robert "Bobby" Scott  
U.S. House of Representatives  
Washington, DC 20515  

Dear Representative Scott:

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Carolyn Maloney  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Maloney:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 22, 2018

The Honorable Frederica Wilson  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Wilson:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
January 18, 2018

The Honorable Wilbur L. Ross, Jr
Secretary of Commerce
U.S. Department of Commerce
1401 Constitution Avenue NW
Washington, D.C. 20230

Dear Secretary Ross:

We write to strongly oppose the Department of Justice’s request to add a question regarding citizenship status to the 2020 decennial census. This duplicative, unnecessary effort seriously threatens the accuracy and integrity of a census, which has tremendous consequences for our country. We urge you to reject this request from the Department of Justice and focus on the goal of conducting a comprehensive, accurate, and cost effective decennial census in 2020.

The addition of a citizenship question, along with the other recently reported actions of pending and/or already appointed unqualified political operatives to the Census to positions that have never been political, calls into question whether this administration is serious about an accurate count or is instead actively working to hurt the integrity of the Census and ultimately discount minority voters.

As you know, the distribution of over $600 billion in annual federal funding and the redistricting of legislative seats for the next decade depend upon a well-executed census. If a citizenship question were to be added to the 2020 questionnaire, we would likely see a significantly dropped head count of already-undercounted minority groups—particularly immigrants, non-citizens, and Latinos. This attack on civil rights would only serve to suppress the minority vote, drop the numbers necessary to apportion federal funding, and push immigrant communities even deeper into the shadows.

The December 12 letter from DOJ General Counsel Arthur Gary to Dr. Ron Jarmin of the Census Bureau argues that further information on citizenship is “critical to the Department’s enforcement of Section 2 of the Voting Rights Act and its important protections against racial discrimination in voting.” We find this argument to be disingenuous considering questions on citizenship have been included on the American Community Survey (ACS), distributed on a monthly basis for the last 13 years. The information derived from the ACS has long been effectively utilized to address voting rights abuses across the country.
Additionally, the final census questions that are due to be submitted to Congress by April 1, 2018, will have undergone an extensive screening process constituting years of focus groups and field tests to ensure a high response rate coupled with effective data collection. Including a new question this late in the process allows no time for testing or the correction of wording problems, and only serves to increase the risk to a census that has already experienced massive cost increases and heightened levels of public mistrust.

New qualitative research from the Census Bureau confirms that survey respondents and focus group participants are expressing an "unprecedented" level of concern regarding the confidentiality of the data they provide to the Bureau and whether that data will be improperly shared with other government agencies, especially immigration officials. While we recognize that Title 13 of the U.S. Code has strict protections against the use of census data for law enforcement, it provides little reassurance to those who have seen their loved ones detained and/or deported under this administration. Pretesting respondents were observed explicitly falsifying data or leaving household members off survey rosters for fear of incrimination. These trends suggest that the addition of a citizenship question could exacerbate confidentiality concerns and severely undermine accuracy and initial response levels. This, in turn, would increase the cost of the census by hundreds of millions of dollars in non-response follow-up, the most expensive component of the decennial census operation.

Mr. Secretary, you have testified before Congress regarding the challenges that the 2020 Decennial faces; adding a citizenship question to the 2020 Census will destabilize and politicize the decennial process at a time when we can least afford it.

As Congress has not provided you with the additional funds that you requested, threatening the already fragile response rate will only jeopardize data accuracy and increase cost to the American taxpayer who will eventually foot the bill when the costs skyrocket because of this proposal. We strongly urge you to show us that you are committed to an accurate Census by denying the Department of Justice's request and working to ensure a full, fair, and accurate decennial census.

Sincerely,

Carolyn B. Maloney  
Member of Congress

Luis V. Gutiérrez  
Member of Congress

José E. Serrano  
Member of Congress
Pramila Jayapal
Member of Congress

Frank Pallone, Jr.
Member of Congress

Grace F. Napolitano
Member of Congress

Donald S. Beyer Jr.
Member of Congress

Suzanne Bonamici
Member of Congress

Bonnie Watson Coleman
Member of Congress

Thomas R. Suozzi
Member of Congress

Julia Brownley
Member of Congress

Raúl M. Grijalva
Member of Congress

Betty McCollum
Member of Congress

Bobby L. Rush
Member of Congress

Nydia M. Velázquez
Member of Congress

A. Donald McEachin
Member of Congress

Mark Takano
Member of Congress

Sheila Jackson Lee
Member of Congress

Nanette Diaz Barragán
Member of Congress
Ra Khanna  
Member of Congress

Tony Cardenas  
Member of Congress

Debbie Wasserman Schultz  
Member of Congress

Juan Vargas  
Member of Congress

Jerry McNerney  
Member of Congress

Jim Costa  
Member of Congress

Jerrold Nadler  
Member of Congress

Adam B. Schiff  
Member of Congress

Robert C. "Bobby" Scott  
Member of Congress

Louise Slaughter  
Member of Congress

Pete Aguilar  
Member of Congress

Jamie Raskin  
Member of Congress

Dina Titus  
Member of Congress

Mark Pocan  
Member of Congress
Alma S. Adams, Ph.D.
Member of Congress

Henry Cuellar, Ph.D.
Member of Congress

Michael E. Capuano
Member of Congress

Alcee L. Hastings
Member of Congress

Adriano Espaillat
Member of Congress

Marcy Kaptur
Member of Congress

Grace Meng
Member of Congress

John Lewis
Member of Congress

Joe Crowley
Member of Congress

James Clyburn
Member of Congress

Jared Huffman
Member of Congress

Eleanor Holmes Norton
Member of Congress

Paul D. Tonko
Member of Congress

Gwen S. Moore
Member of Congress
Daniel T. Kildee
Member of Congress

Lois Frankel
Member of Congress

Engelbert Cutler
Member of Congress

Nita Lowey
Member of Congress

James E. Clyburn
Member of Congress

Lisa Blunt Rochester
Member of Congress

Doris Matsui
Member of Congress

Adam Smith
Member of Congress

James P. McGovern
Member of Congress

Wm. Lacy Clay
Member of Congress

James A. Hines
Member of Congress

David Scott
Member of Congress

Ruben Kihuen
Member of Congress

Vicente Gonzalez
Member of Congress
Maxine Waters
Member of Congress

Albio Sires
Member of Congress

Gregorio Kilili Camacho Sablan
Member of Congress

Salud O. Carbajal
Member of Congress

Ed Perlmutter
Member of Congress

Jacky Rosen
Member of Congress

Eliot L. Engel
Member of Congress

John K. Delaney
Member of Congress

Karen Bass
Member of Congress

Bill Pascrell, Jr.
Member of Congress

Marc Veasey
Member of Congress

Peter Welch
Member of Congress

Eddie Bernice Johnson
Member of Congress

Scott H. Peters
Member of Congress
Danny K. Davis
Member of Congress
February 26, 2018

The Honorable Pete Aguilar
U.S. House of Representatives
Washington, D.C. 20515

Dear Representative Aguilar:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a full, fair, and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I reported back to Congress last October after I conducted a rigorous deep dive to produce a new 2020 Census lifecycle cost estimate as well as a thorough review of Census programming and financial management. I have assembled a multidisciplinary team to address and remedy concerns expressed by the Government Accountability Office, the Department of Commerce’s Office of the Inspector General, the Office of Management and Budget, and Congressional members. In addition, I have put into place the people, processes, and programs to ensure strong governance and oversight of the 2020 Census.

We will keep you apprised of any developments regarding the citizenship question. If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Ted Lieu
U.S. House of Representatives
Washington, DC 20515

Dear Representative Lieu:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Nanette Díaz Barragan
U.S. House of Representatives
Washington, DC 20515

Dear Representative Barragan:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Lisa Blunt Rochester
U.S. House of Representatives
Washington, DC 20515

Dear Representative Blunt Rochester:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Luis Correa
U.S. House of Representatives
Washington, DC 20515

Dear Representative Correa:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Anthony Brown  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Brown:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Salud Carbajal
U.S. House of Representatives
Washington, DC 20515

Dear Representative Carbajal:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Adriano Espaillat
U.S. House of Representatives
Washington, DC 20515

Dear Representative Espaillat:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Vicente Gonzalez  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Gonzalez:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Ro Khanna  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Khanna:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable A. Donald McEachin
U.S. House of Representatives
Washington, DC 20515

Dear Representative McEachin:

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Jimmy Gomez  
U.S. House of Representatives  
Washington, DC  20515

Dear Representative Gomez:

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Darren Soto  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Soto:

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Bennie G. Thompson  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Thompson:

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Keith Ellison
U.S. House of Representatives
Washington, DC 20515

Dear Representative Ellison:

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Karen Bass
U.S. House of Representatives
Washington, DC 20515

Dear Representative Bass:

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Colleen Hanabusa  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Hanabusa:

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Wilbur Ross
February 26, 2018

The Honorable Tony Cardenas
U.S. House of Representatives
Washington, DC  20515

Dear Representative Cardenas:

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Grace Meng
U.S. House of Representatives
Washington, DC 20515

Dear Representative Meng:

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Sincerely,

Wilbur Ross

[Signature]
February 26, 2018

The Honorable Mark Pocan
U.S. House of Representatives
Washington, DC 20515

Dear Representative Pocan:

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[Signature]

Wilbur Ross
February 26, 2018

The Honorable Mark Takano  
U.S. House of Representatives  
Washington, DC  20515

Dear Representative Takano:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a full, fair, and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I reported back to Congress last October after I conducted a rigorous deep dive to produce a new 2020 Census lifecycle cost estimate as well as a thorough review of Census programming and financial management. I have assembled a multidisciplinary team to address and remedy concerns expressed by the Government Accountability Office, the Department of Commerce’s Office of the Inspector General, the Office of Management and Budget, and Congressional members. In addition, I have put into place the people, processes, and programs to ensure strong governance and oversight of the 2020 Census.

We will keep you apprised of any developments regarding the citizenship question. If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Juan Vargas  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Vargas:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Marc Veasey  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Veasey:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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Sincerely,

[Signature]

Wilbur Ross
February 26, 2018

The Honorable Filemon Vela
U.S. House of Representatives
Washington, DC 20515

Dear Representative Vela:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Tom O’Halleran  
U.S. House of Representatives  
Washington, DC  20515

Dear Representative O’Halleran:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Rosa L. DeLauro
U.S. House of Representatives
Washington, DC 20515

Dear Representative DeLauro:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

[Signature]

Wilbur Ross
February 26, 2018

The Honorable Daniel T. Kildee  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Kildee:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Lois Frankel  
U.S. House of Representatives  
Washington, DC 20515  

Dear Representative Frankel:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Emanuel Cleaver  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Cleaver:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Nita Lowey
U.S. House of Representatives
Washington, DC 20515

Dear Representative Lowey:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Bill Foster  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Foster:

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Zoe Lofgren  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Lofgren:

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Kathleen Rice  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Rice:

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Theodore E. Deutch  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Deutch:

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Wilbur Ross
February 26, 2018

The Honorable Charlie Crist
U.S. House of Representatives
Washington, DC 20515

Dear Representative Crist:

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Wilbur Ross
February 26, 2018

The Honorable Mark DeSaulnier
U.S. House of Representatives
Washington, DC 20515

Dear Representative DeSaulnier:

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[Signature]

Wilbur Ross
February 26, 2018

The Honorable Robin Kelly
U.S. House of Representatives
Washington, DC 20515

Dear Representative Kelly:

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Katherine Clark  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Clark:

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Wilbur Ross
February 26, 2018

The Honorable John Lewis
U.S. House of Representatives
Washington, DC 20515

Dear Representative Lewis:

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Kathy Castor
U.S. House of Representatives
Washington, DC 20515

Dear Representative Castor:

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Sincerely,

Wilbur Ross

[Signature]
February 26, 2018

The Honorable Dwight Evans  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Evans:

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Wilbur Ross
February 26, 2018

The Honorable Joe Courtney  
U.S. House of Representatives  
Washington, DC  20515

Dear Representative Courtney:

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We will keep you apprised of any developments regarding the citizenship question. If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross
February 26, 2018

The Honorable David Price
U.S. House of Representatives
Washington, DC 20515

Dear Representative Price:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Joseph P. Kennedy III
U.S. House of Representatives
Washington, DC 20515

Dear Representative Kennedy:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Al Lawson, Jr.
U.S. House of Representatives
Washington, DC 20515

Dear Representative Lawson:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Mike Doyle
U.S. House of Representatives
Washington, DC 20515

Dear Representative Doyle:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Sanford D. Bishop, Jr.
U.S. House of Representatives
Washington, DC 20515

Dear Representative Bishop:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable C.A. Dutch Ruppersberger
U.S. House of Representatives
Washington, DC 20515

Dear Representative Ruppersberger:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

[Signature]

Wilbur Ross
February 26, 2018

The Honorable Donald M. Payne, Jr.
U.S. House of Representatives
Washington, DC 20515

Dear Representative Payne:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Lloyd Doggett
U.S. House of Representatives
Washington, DC 20515

Dear Representative Doggett:

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Sander M. Levin  
U.S. House of Representatives  
Washington, DC 20515  

Dear Representative Levin:

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Sincerely,

[Signature]
Wilbur Ross
February 26, 2018

The Honorable Joyce Beatty  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Beatty:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Jimmy Panetta
U.S. House of Representatives
Washington, DC 20515

Dear Representative Panetta:

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Richard M. Nolan
U.S. House of Representatives
Washington, DC 20515

Dear Representative Nolan:

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Sincerely,

[Signature]

Wilbur Ross
February 26, 2018

The Honorable Gwen Moore
U.S. House of Representatives
Washington, DC  20515

Dear Representative Moore:

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Eddie Bernice Johnson  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Johnson:

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Paul D. Tonko
U.S. House of Representatives
Washington, DC 20515

Dear Representative Tonko:

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Grace Napolitano  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Napolitano:

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Wm. Lacy Clay
U.S. House of Representatives
Washington, DC 20515

Dear Representative Clay:

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Jared Huffman
U.S. House of Representatives
Washington, DC 20515

Dear Representative Huffman:

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Hakeem Jeffries
U.S. House of Representatives
Washington, DC 20515

Dear Representative Jeffries:

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Joseph Crowley
U.S. House of Representatives
Washington, DC 20515

Dear Representative Crowley:

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Bonnie Watson Coleman  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Watson Coleman:

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Marcy Kaptur  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Kaptur:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Michael E. Capuano
U.S. House of Representatives
Washington, DC 20515

Dear Representative Capuano:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Henry Cuellar, Ph.D.
U.S. House of Representatives
Washington, DC  20515

Dear Representative Cuellar:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Jose Serrano
U.S. House of Representatives
Washington, DC 20515

Dear Representative Serrano:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Robert C. "Bobby" Scott  
U.S. House of Representatives  
Washington, DC 20515  

Dear Representative Scott:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Bill Pascrell, Jr.
U.S. House of Representatives
Washington, DC 20515

Dear Representative Pascrell:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Peter Welch
U.S. House of Representatives
Washington, DC 20515

Dear Representative Welch:

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Scott H. Peters
U.S. House of Representatives
Washington, DC 20515

Dear Representative Peters:

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Sincerely,

Wilbur Ross

000990
February 26, 2018

The Honorable Joaquin Castro  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Castro:

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Wilbur Ross

000991
February 26, 2018

The Honorable Brian Higgins
U.S. House of Representatives
Washington, DC 20515

Dear Representative Higgins:

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Seth Moulton
U.S. House of Representatives
Washington, DC 20515

Dear Representative Moulton:

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable William R. Keating
U.S. House of Representatives
Washington, DC 20515

Dear Representative Keating:

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable David N. Cicilline  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Cicilline:

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Wilbur Ross
February 26, 2018

The Honorable John B. Larson
U.S. House of Representatives
Washington, DC 20515

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable James E. Clyburn  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Clyburn:

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Adam Smith
U.S. House of Representatives
Washington, DC 20515

Dear Representative Smith:

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable James P. McGovern
U.S. House of Representatives
Washington, DC 20515

Dear Representative McGovern:

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable James A. Himes
U.S. House of Representatives
Washington, DC 20515

Dear Representative Himes:

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Sincerely,

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The Honorable David Scott
U.S. House of Representatives
Washington, DC 20515

Dear Representative Scott:

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Wilbur Ross
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The Honorable Ruben Kihuen  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Kihuen:

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Sincerely,

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February 26, 2018

The Honorable Maxine Waters
U.S. House of Representatives
Washington, DC 20515

Dear Representative Waters:

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[Signature]

Wilbur Ross
February 26, 2018

The Honorable Gregorio Kilili Camacho Sablan
U.S. House of Representatives
Washington, DC 20515

Dear Representative Sablan:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a full, fair, and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I reported back to Congress last October after I conducted a rigorous deep dive to produce a new 2020 Census lifecycle cost estimate as well as a thorough review of Census programming and financial management. I have assembled a multidisciplinary team to address and remedy concerns expressed by the Government Accountability Office, the Department of Commerce’s Office of the Inspector General, the Office of Management and Budget, and Congressional members. In addition, I have put into place the people, processes, and programs to ensure strong governance and oversight of the 2020 Census.

We will keep you apprised of any developments regarding the citizenship question. If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Ed Perlmutter
U.S. House of Representatives
Washington, DC 20515

Dear Representative Perlmutter:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Jacky Rosen
U.S. House of Representatives
Washington, DC 20515

Dear Representative Rosen:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Eliot L. Engel
U.S. House of Representatives
Washington, DC 20515

Dear Representative Engel:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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Sincerely,

Wilbur Ross

001007
February 26, 2018

The Honorable John K. Delaney
U.S. House of Representatives
Washington, DC  20515

Dear Representative Delaney:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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Sincerely,

Wilbur Ross

[Signature]
February 26, 2018

The Honorable Jim Costa  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Costa:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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Sincerely,

Wilbur J. Ross
February 26, 2018

The Honorable Doris Matsui  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Matsui:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

[Signature]

Wilbur Ross
February 26, 2018

The Honorable Albio Sires  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Sires:

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Jamie Raskin
U.S. House of Representatives
Washington, DC 20515

Dear Representative Raskin:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Dina Titus  
U.S. House of Representatives  
Washington, DC  20515  

Dear Representative Titus:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Linda T. Sanchez  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Sanchez:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross

[Signature]
February 26, 2018

The Honorable Jerry McNerney  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative McNerney:

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Alma S. Adams, Ph.D.
U.S. House of Representatives
Washington, DC 20515

Dear Representative Adams:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Jerrold Nadler  
U.S. House of Representatives  
Washington, DC  20515

Dear Representative Nadler:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Bobby Rush
U.S. House of Representatives
Washington, DC 20515

Dear Representative Rush:

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Adam B. Schiff
U.S. House of Representatives
Washington, DC 20515

Dear Representative Schiff:

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Lucille Roybal-Allard
U.S. House of Representatives
Washington, DC 20515

Dear Representative Roybal-Allard:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Nydia Velazquez
U.S. House of Representatives
Washington, DC 20515

Dear Representative Velazquez:

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Sheila Jackson Lee  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Jackson Lee:

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Danny Davis  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Davis:

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Sincerely,

Wilbur Ross

001023
February 26, 2018

The Honorable Carolyn B. Maloney
U.S. House of Representatives
Washington, DC 20515

Dear Representative Maloney:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Luis V. Gutierrez
U.S. House of Representatives
Washington, DC 20515

Dear Representative Gutierrez:

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We will keep you apprised of any developments regarding the citizenship question. If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Raul Grijalva
U.S. House of Representatives
Washington, DC 20515

Dear Representative Grijalva:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Betty McCollum
U.S. House of Representatives
Washington, DC 20515

Dear Representative McCollum:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Frank Pallone, Jr.
U.S. House of Representatives
Washington, DC 20515

Dear Representative Pallone:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Judy Chu  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Chu:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Pramila Jayapal
U.S. House of Representatives
Washington, DC 20515

Dear Representative Jayapal:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Donald S. Beyer, Jr.
U.S. House of Representatives
Washington, DC 20515

Dear Representative Beyer:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Suzanne Bonamici  
U.S. House of Representatives  
Washington, DC  20515

Dear Representative Bonamici:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Eleanor Holmes Norton
U.S. House of Representatives
Washington, DC 20515

Dear Representative Norton:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Thomas R. Suozzi
U.S. House of Representatives
Washington, DC 20515

Dear Representative Suozzi:

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Alcee Hastings
U.S. House of Representatives
Washington, DC 20515

Dear Representative Hastings:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Julia Brownley  
U.S. House of Representatives  
Washington, DC  20515  

Dear Representative Brownley:

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Brad Sherman
U.S. House of Representatives
Washington, DC 20515

Dear Representative Sherman:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Janice D. Schakowsky
U.S. House of Representatives
Washington, DC 20515

Dear Representative Schakowsky:

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Andre Carson
U.S. House of Representatives
Washington, DC 20515

Dear Representative Carson:

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Mike Quigley
U.S. House of Representatives
Washington, DC 20515

Dear Representative Quigley:

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Debbie Wasserman Schultz  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Wasserman Schultz:

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Earl Blumenauer  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Blumenauer:

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Val Demings
U.S. House of Representatives
Washington, DC 20515

Dear Representative Demings:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 26, 2018

The Honorable Louise M. Slaughter  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Slaughter:

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Sincerely,

Wilbur Ross
January 19, 2018

The Honorable Wilbur L. Ross, Jr.
Secretary
U.S. Department of Commerce
1401 Constitution Ave NW
Washington, D.C. 20230

Dear Secretary Ross:

We are writing to respectfully urge that a citizenship question not be included on the 2020 Census form and to oppose any proposals that could negatively impact an accurate count of Los Angeles County residents in the 2020 Census.

On December 12, 2017, the U.S. Department of Justice wrote to the U.S. Census Bureau proposing the inclusion of a citizenship question on the 2020 Census form. A question on citizenship status in the 2020 Census will likely suppress census response rates by deterring individuals afraid to disclose their immigration status from filling out the census form.

The State of California, and particularly Los Angeles County, already faces significant challenges in counting minorities, immigrants, and other Hard-to-Survey (HTS) populations. In the 2010 Census, for example, more than 113,000 Latino children in California and an estimated 47,000 Latino children in Los Angeles County were not counted, according to a study conducted by the National Association of Latino Elected and Appointed Officials Educational Fund and Child Trends' Hispanic Institute. Adding a question regarding citizenship on the 2020 Census will make counting Latinos, other migrant communities, and all other HTS populations in the County an even more difficult task.

The decennial census is used to determine political representation and allocate hundreds of billions of dollars in Federal funding to states and localities. A complete and accurate census count is critical to the County's political representation and ability to maintain funding for Federal assistance programs that are distributed based on decennial census-derived statistics.
Thank you for your consideration of this important matter.

Sincerely,

SHEILA KUEHL
Chair of the Board
Supervisor, Third District

HILDA L. SOLIS
Supervisor, First District

JANICE HAHN
Supervisor, Fourth District

MARK RIDLEY-THOMAS
Supervisor, Second District

KATHRYN BARGER
Supervisor, Fifth District
February 22, 2018

Ms. Sheila Kuehl  
Chair of the Board, Supervisor, Third District  
County of Los Angeles  
Board of Supervisors  
Kenneth Hahn Hall of Administration  
500 West Temple Street  
Los Angeles, CA 90012

Dear Ms. Kuehl:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a full, fair, and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I reported back to Congress last October after I conducted a rigorous deep dive to produce a new 2020 Census lifecycle cost estimate as well as a thorough review of Census programming and financial management. I have assembled a multidisciplinary team to address and remedy concerns expressed by the Government Accountability Office, the Department of Commerce’s Office of the Inspector General, the Office of Management and Budget, and Congressional members. In addition, I have put into place the people, processes, and programs to ensure strong governance and oversight of the 2020 Census.

We will keep you apprised of any developments regarding the citizenship question. If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross

001047
February 22, 2018

Ms. Hilda L. Solis
Supervisor, First District
County of Los Angeles
Board of Supervisors
Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, CA 90012

Dear Ms. Solis:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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Sincerely,

Wilbur Ross

001048
February 22, 2018

Mr. Mark Ridley-Thomas  
Supervisor, Second District  
County of Los Angeles  
Board of Supervisors  
Kenneth Hahn Hall of Administration  
500 West Temple Street  
Los Angeles, CA  90012

Dear Mr. Ridley-Thomas:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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We will keep you apprised of any developments regarding the citizenship question. If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross

Wilbur Ross
February 22, 2018

Ms. Janice Hahn  
Supervisor, Fourth District  
County of Los Angeles  
Board of Supervisors  
Kenneth Hahn Hall of Administration  
500 West Temple Street  
Los Angeles, CA 90012

Dear Ms. Hahn:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a full, fair, and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I reported back to Congress last October after I conducted a rigorous deep dive to produce a new 2020 Census lifecycle cost estimate as well as a thorough review of Census programming and financial management. I have assembled a multidisciplinary team to address and remedy concerns expressed by the Government Accountability Office, the Department of Commerce’s Office of the Inspector General, the Office of Management and Budget, and Congressional members. In addition, I have put into place the people, processes, and programs to ensure strong governance and oversight of the 2020 Census.

We will keep you apprised of any developments regarding the citizenship question. If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross
February 22, 2018

Ms. Kathryn Barger  
Supervisor, Fifth District  
County of Los Angeles  
Board of Supervisors  
Kenneth Hahn Hall of Administration  
500 West Temple Street  
Los Angeles, CA 90012

Dear Ms. Barger:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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Sincerely,

Wilbur Ross
Subject: Letter re. DoJ citizenship question from Population Association of America and Association of Population Centers

Dear Secretary Ross,

On behalf of the presidents of the Population Association of America and Association of Population Centers, Dr. Wendy Manning and Dr. Steve Ruggles, I am pleased to provide you with the attached letter expressing our concerns regarding a recent request that the Department of Commerce received to add a citizenship question on the 2020 Census. We appreciate you taking our organizations' views into consideration during the ongoing deliberations.

Sincerely,

Mary Jo Hoeksema
Director, Government Affairs
Population Association of America/
Association of Population Centers
Deputy Director, The Census Project
January 23, 2018

The Honorable Wilbur Ross  
Secretary  
Department of Commerce  
1401 Constitution Avenue, NW  
Washington, DC  20230

Dear Secretary Ross,

On behalf of the over 3,000 scientists who are members of the Population Association of America (PAA) (www.populationassociation.org) and the over 40 federally supported population research centers at U.S. based research institutions comprising the Association of Population Centers (APC), we are writing to express our concerns regarding a request you recently received from the Department of Justice (DoJ) to add a citizenship question to the 2020 Census.

Population scientists include demographers, economists, and sociologists who conduct research on population trends and the individual, societal, and environmental implications of population change. They rely on the accurate and timely data from the federal statistical agencies to produce research findings and conduct research training activities. Decennial census data are the primary source of information population scientists rely on to monitor and analyze changes in the U.S. population. As a result, we share a profound commitment with other census stakeholders to ensuring full public participation in the decennial census. Our organizations recognize that based on your public comments, you are also committed to spearheading a full, fair, and accurate 2020 Census.

On January 10, you received a letter signed by almost 200 organizations, including ours, urging the Department of Commerce to reject a recent request from the Department of Justice for a new citizenship question on the 2020 Census. The letter outlined numerous adverse fiscal, operational, and legal consequences of adding such a question. As scientists, we are especially concerned about the negative effect an untested citizenship question would have on response rates and the validity of the decennial data. Based on the experience of other surveys, population scientists have observed that responses to citizenship questions tend to be of low quality. Further, we have seen firsthand how adding questions to any survey inherently increases costs as well.

As you know, and as noted in the January 10 letter, questionnaire design and testing began nearly eight years ago. With less than two years before Census 2020, there is simply not enough time to responsibly craft and
evaluate how a citizenship question would affect census participation. Further, we are concerned that adding a question, particularly one that could influence enhanced nonresponse follow up activity, will significantly increase the costs of the 2020 Census at a time when Congress is already considering a request from the Administration to spend an estimated additional $3 billion on the 2020 Census.

We trust the Administration is weighing the harmful effects, including increased costs, suppressed response rates, and unreliable data, that the citizenship question could have this late in the decennial planning process—a process that is already facing tremendous challenges in its ramp up to Census 2020. Our organizations urge you to reject this request from the Department of Justice, and we thank you for considering our views.

Sincerely,

Wendy Manning, Ph.D., President
Population Association of America

Steve Ruggles, Ph.D., President
Association of Population Centers

cc: Ron Jarmin, Acting Director, U.S. Census Bureau
    Nancy Potok, Chief Statistician of the United States
February 23, 2018

Ms. Wendy Manning, Ph.D.
President
Population Association of America
8630 Fenton Street, Suite 722
Silver Spring, MD 20910

Dear Dr. Manning:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a full, fair, and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I reported back to Congress last October after I conducted a rigorous deep dive to produce a new 2020 Census lifecycle cost estimate as well as a thorough review of Census programming and financial management. I have assembled a multidisciplinary team to address and remedy concerns expressed by the Government Accountability Office, the Department of Commerce’s Office of the Inspector General, the Office of Management and Budget, and Congressional members. In addition, I have put into place the people, processes, and programs to ensure strong governance and oversight of the 2020 Census.

If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663. Thank you again for your letter. We appreciate your thoughtful input.

Sincerely,

Wilbur Ross
February 23, 2018

Mr. Steve Ruggles, Ph.D.
President
Association of Population Centers
8630 Fenton Street, Suite 722
Silver Spring, MD 20910

Dear Dr. Ruggles:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663. Thank you again for your letter. We appreciate your thoughtful input.

Sincerely,

Wilbur Ross
Dear Secretary Ross:

As former directors of the U.S. Census Bureau, serving under both Republican and Democratic administrations, we want to thank you for the care for the future of the Census Bureau you have displayed. We were, however, troubled to learn that the Department of Justice has recently asked the Bureau to add a new question on citizenship to the 2020 census. We are deeply concerned about the consequences of this possible action and hope that our objective observations provide a useful perspective before a final decision is made on this issue.

We were encouraged by your testimony before the Census Bureau's House and Senate authorizing committees last October. Your frank assessment of the status of 2020 Census preparations and your acknowledgment that the Bureau will need more resources to conduct an acceptably accurate enumeration were correct. Undoubtedly, your substantial private sector experience has informed your approach to the Bureau's mission. Similarly, your experience as a census enumerator many years ago may have helped to shape your appreciation for the importance of the fair and accurate census our Constitution envisions, free from partisan influence and guided by sound, well documented, scientifically driven decisions.

There is a well-proven multi-year process to suggest and test new questions. 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. Your observation at the House Oversight and Government Reform Committee hearing on October 12, 2017 — that adding untested questions could reduce response rates — suggests that you have carefully considered respondent burden and other factors that contribute to public acceptance of censuses and surveys, as the window of opportunity to lock down census methods, operations, content, and infrastructure closes quickly.

As you fully appreciate, planning a decennial census is an enormous challenge. Preparations for a census are complex, with each component related to and built upon previous research and tests. The critical

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1 We think you will enjoy recalling that Kenneth Prewitt, a signer of this letter, was your crew leader in 1960. You were in the Harvard Business School, and he in the Harvard Divinity School; like you, he wanted to make some extra money over spring break. Ken was appointed a crew leader and recruited enumerators only from the HBS, knowing that they would carry out their duties efficiently. Indeed, they (you) did — your crew finished first in Boston, with the highest accuracy score in the city.
‘dress rehearsal’ for the 2020 Census (the 2018 End-to-End Census Test) is starting in Providence County, RI. Adding a citizenship question without a testing opportunity in a contemporary, census-like environment will invalidate the results and lessons learned from the End-to-End test. Key assumptions underlying estimates of self-response, staffing needs, local office sites, and communication strategies will no longer be sound, calling into question cost projections that we know you have worked hard to validate and update. In addition, the Census Bureau would need to modify data capture and processing systems, language assistance and enumerator training materials, and web-based instructions for completing the census in the time remaining before the 2020 Census starts – all without the benefit of field testing.

There are sound reasons that the Census Act requires the Bureau to submit to Congress the topics and actual questions it will include, three and two years, respectively, before Census Day. It is highly risky to ask untested questions in the context of the complete 2020 Census design. There is a great deal of evidence that even small changes in survey question order, wording, and instructions can have significant, and often unexpected, consequences for the rate, quality, and truthfulness of response. The effect of adding a citizenship question to the 2020 Census on data quality and census accuracy, therefore, is completely unknown. Also of import, overcoming unexpected obstacles that arise as 2020 Census operations unfold would add to the cost, without assurances that such efforts would yield a more accurate outcome.

In summary, we believe that adding a citizenship question to the 2020 Census will considerably increase the risks to the 2020 enumeration. Because we share your goal of a “full, fair, and accurate census,” as the Constitution requires, we urge you to consider a prudent course of action in response to the Justice Department’s untimely and potentially disruptive request.

Please let us know if we can answer any questions or be of further assistance.

Sincerely,

Martha Farnsworth Riche (1994-1998)
Steven H. Murdock (2008-2009)
Robert M. Groves (2009–2012)
January 26, 2018

The Hon. Mick Mulvaney, Director
The Office of Management and Budget
725 17th Street, NW
Washington, D.C. 20503

The Hon. Wilbur Ross, Secretary
U.S. Department of Commerce
1401 Constitution Avenue, NW
Washington, D.C. 20230

The Hon. Dr. Ron Jarmin, Acting Director
U.S. Census Bureau
4500 Silver Hill Road
Washington, D.C. 20233

Dear Director Mulvaney, Secretary Ross, Acting Director Jarmin:

On behalf of the Chicago Metropolitan Agency for Planning (CMAP) and its Board, I am writing to express support for initiatives that ensure the U.S. Census Bureau can complete a full and accurate count in the 2020 Census. As the metropolitan planning organization for the Chicago region, census data are invaluable to completing our mission of comprehensive planning in support of transportation, land use, economic development, and environmental protection in northeastern Illinois, which is home to over 8.5 million people and 4.4 million jobs.

Funding levels proposed for Fiscal Year (FY) 2018 for the 2020 Census are inadequate, including those that have been part of continuing resolutions. To date, the Census Bureau has been unable to complete numerous preliminary activities that would bolster the integrity of the Census. We commend efforts to modernize the Census because they could yield benefits such as cost reduction and improved data quality. However, underfunding thus far has diminished the Bureau’s ability to sufficiently pilot the questionnaire, safeguard data infrastructure, and conduct rigorous testing of elements such as new and modified information technology systems.

According to the U.S. Government Accountability office, the return of census questionnaires by mail has declined substantially from 78 percent in 1970, to 63 percent in 2010. Insufficient investment in marketing and community partnerships to inform the public about the upcoming
census could result in increased costs and the potential underrepresentation of non-responding households.

Since its inception, CMAP has worked to ensure prudent and data-driven decision-making, particularly concerning the investment of public resources. An inadequate 2020 Census would impair the ability of state and local governments in northeastern Illinois to meet their responsibilities per federal law. For example, CMAP’s federally required transportation plan uses census data on employment, housing, demographics to inform selection of the region’s future large-scale roadway and transit projects. Unreliable census data would undermine countless public decision-making processes in transportation, education, and development. Not only would CMAP’s long-range planning be affected, it would also compromise public and private entities’ ability to provide a variety of critical services for residents and businesses and could therefore have lasting, detrimental effects on our economy.

I urge you to advocate for sufficient funding in FY 2018 and to include sufficient funding in the President’s budget for FY 2019 to support an accurate and full count in the 2020 Census. On behalf of the CMAP Board, I appreciate your consideration:

Sincerely,

Gerald R. Bennett, Chair-Chicago Metropolitan Agency for Planning
Mayor-City of Palos Hills

cc: Northeastern Illinois Congressional Delegation
January 29, 2018

THE HONORABLE WILBUR L. ROSS, SECRETARY
UNITED STATES DEPARTMENT OF COMMERCE
1401 CONSTITUTIONAL AVE. NW
WASHINGTON D.C. 20230

RE: U.S. CITIZEN CENSUS COUNTS
ANCHOR BIRTHS

Dear Mr. Secretary:

I have enclosed for your information a copy of a letter I have sent President Trump today regarding the above matters.

Very truly yours,

[Signature]
January 29, 2018

Honorable Donald J. Trump, President
United States of America
The White House
Washington D.C.

index

RE: U.S. CITIZENS CENSUS COUNTS
& ANCHOR BIRTHS

Dear Mr. President:

Immigration law was a significant area of my 50 year legal practice and I support your efforts to take control of our borders. I also value my good fortune to have obtained my U.S. citizenship by birth and oppose the efforts of those of our citizens who would, for political reasons, extend that status to anyone who, with the capacity of criminal intent, violates our laws of entry or by act or omission intends to avoid or weaken our ability to apply those laws in the conduct of our internal affairs.

A prime example of the latter aspect is that prior censuses have not given the highlighted provision of Section 2 of the 14th Amendment to the U.S. Constitution below the attention it deserves:

Representatives shall be apportioned among the several states according to their respective numbers, counting the whole number of persons in each state, excluding Indians not taxed. But when the right to vote at any election for the choice of electors for President and Vice President of the United States, Representatives in Congress, the executive and judicial officers of a state, or the members of the legislature thereof, is denied to any of the male inhabitants of such state, being twenty-one years of age, and citizens of the United States, or in any way abridged, except for participation in rebellion, or other crime, the basis of representation therein shall be reduced in the proportion which the number of such male citizens shall bear to the whole number of male citizens twenty-one years of age in such state. (Emphasis supplied)

The Amendment, ratified in 1868, was necessary to negate the Supreme Court’s 1859 infamous Dred Scott decision that held slaves were not citizens. In so doing it both affirmed each State’s total population as the basis of apportionment of representatives among the states and separately established their respective citizen populations as the basis to assure their right to elect those representatives.

Obviously, those voting rights cannot be enforced unless there is reliable data establishing the numbers of each state’s citizen population. In 2010 the basic 10 question census form mailed to, or left for completion at, approximately 130,000,000 housing units did not ask any question re citizenship. The source of that data was provided by approximately 250,000 separate monthly surveys conducted by the “American Community Survey” division of the Department of Commerce’s Census Bureau. Some prior censuses did obtain that citizenship data by mailing a separate “Long”, instead of the basic “Short”, census form, to a portion of the total population.
The process utilized to arrive at the respective total citizen populations is referred to as “statistical sampling” ("imputation") as opposed to an actual numerical count, ("enumeration"). Use of this sampling - imputation procedure for apportionment purposes is specifically prohibited by Section 195 of Title 13, of the U.S. Code.

In Department of Commerce v. United States House of Representatives, 525 U.S. 316 (1999) the Court held that utilizing small statistical samples to impute total U.S. population was prohibited by the statute. In the subsequent case Utah v Evans, 536 U.S. 452 (2002) the Court held that the status of occupied properties within an individual census tract could be used to impute the occupied status of similar vacant nearby properties within the same census tract.

The national return rate of the 2010 - ten question census forms was approximately 108,879,000. Considering that none these forms asked any question about citizenship it is certainly questionable whether reliance upon the American Community Survey’s separate imputation method to determine the number of our citizens satisfies the Constitutional requirement. This issue can be put to rest by simply requiring every census form to ask every occupant of a housing unit on the Census’s Master Address Mailing List two simple questions: 1) Was a designated occupant born in the U.S.? And, 2) if the answer is “No” is the occupant a naturalized U.S. Citizen?

ANCHOR BIRTHS

Another significant immigration issue I believe needs to be addressed is the contention that any child born in the U.S. automatically becomes a U.S. Citizen. The foundation for this result is the first sentence of Section (1) of the 14th Amendment to the U.S. Constitution that provides:

“All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and the State wherein they reside.”

The significance of the word “reside” in this provision was recognized in the bell weather case United States vs Wong Kim Ark, 169 U.S. 649 (1898), in which it was stipulated by both parties that before and following the birth of the child involved his parents were domiciled in San Francisco. In holding that the child was a U.S. citizen by birth the Supreme Court relied upon the stipulated fact of his U.S. domicile. While the case is often cited as the authority for the claim that any child born in the U.S, automatically becomes a U.S. citizen the fact that the child was domiciled in the U.S. at the time of his birth is typically omitted.

Of note for entry in the realm of inconsistency is that a child of a U.S. citizen born outside of the U.S. does not automatically become a U.S. citizen unless - he or she is under the age of 18, has been admitted to the U.S. pursuant to a request for permanent residence, and is in the legal and physical custody of a citizen parent.

It is respectfully submitted that in resolving the DACA issues inclusion of a statutory provision affirming both domicile and birth as conditions of birth citizenship would be appropriate.

Sincerely,

[Signature]

cc: Honorable Wilbur L. Ross, Secretary
United States Department of Commerce
January 29, 2018

The Honorable Wilbur Ross
Secretary of Commerce
U.S. Department of Commerce
1401 Constitution Avenue NW
Washington, DC 20230

Dear Secretary Ross,

It is hard to exaggerate the importance of a successful decennial census for municipalities across our nation. Census results determine the number of seats each state has in the House of Representatives, are used to draw political districts at federal, state and local levels, and affect the distribution of billions of dollars of federal funding annually to local communities for infrastructure and vital services like hospitals and schools. An inaccurate census leads to underrepresentation and fewer dollars for many of our most vulnerable communities.

We share the goal you have set for a full, fair and accurate 2020 Census. As such, we want to raise three areas of concern with you: adequate funding; qualified Census Bureau leadership; and rejecting untested questions that threaten to undermine census preparations and accuracy.

First, ensuring that the 2020 Census has the necessary resources to meet the challenges of enumerating a geographically, economically, culturally, and linguistically diverse population is foundational to its success. The Census Bureau must be able to implement effectively the range of data collection methods the 2020 Census will include, including new Internet and telephone response options and a traditional paper questionnaire. We were pleased that you requested an additional $187 million for the Census Bureau in Fiscal Year (FY) 2018, for a total of $1.684 billion, in order to fund IT systems development (e.g. scalability; cyber-security systems) and system integration and readiness for the 2018 End-to-End Census Test.

However, this proposed increase does not include any additional funding for the Integrated Partnership and Communications program, which is essential to keeping long term census costs in check, given the growing barriers to a successful census. We are facing unprecedented challenges to a fair, accurate, and cost-effective census. Factors that could depress self-response rates considerably include the perception of cyber-security risks; real cyber-security threats; the digital divide affecting rural, low income, minority, and older households; a growing climate of fear among immigrants, regardless of their legal status; and growing anti-government sentiment in some communities.
To address these challenges, we urge additional resources to increase the number of Partnership Specialists in FY 2018 from the current 43 to 200, to help educate and guide state and local governments and vital "trusted voices" at the local level as they prepare to support the work of the Census Bureau during final preparations and early promotion in 2019 and execution of the count in 2020. Given the lower projected self-response rate embodied in your revised lifecycle cost estimate, we also urge a concurrent increase in the number of Area Census Offices, from the planned 248 to 300, to open in FY 2019. Finally, we believe new Census Bureau research documenting the growing reluctance of immigrants to participate (fully, if at all) in surveys and census tests will require expanded research and testing of effective messages and communications avenues to overcome this significant barrier to an inclusive enumeration.

We urge you to work closely with Congress in the coming weeks to ensure that the final FY 2018 omnibus appropriations bill includes not only the additional $1.684 billion adjusted allocation the administration requested for the Census Bureau, but additional funds to expand the number of Partnership Specialists in 2018, expand messaging research and testing before the early communications campaign begins at the start of 2019, and a larger field footprint to enhance a projected higher number of households that require personal visits in the Nonresponse Follow-up operation.

Secondly, the Census Bureau has long benefited from exceptional leadership, helping the agency carry out its mission of serving as the leading source of quality data about the nation's people and economy. The American people must have confidence that the Bureau's leaders will uphold its core principles of protecting confidentiality, sharing expertise, and conducting its work openly and fairly, without regard to partisan interests, and be guided by a commitment to scientific objectivity and excellence and research-based innovation.

Now, more than ever, the Census Bureau needs strong, permanent leadership to steer the agency through crucial preparations and implementation of the 2020 decennial count. To that end, we urge the president to nominate a highly qualified, nonpartisan candidate who is respected on both sides of the political aisle to be Census Director. At the same time, we are troubled by the administration's reported intent to appoint a candidate for Census Bureau deputy director whose body of professional work largely centers around achieving partisan advantage in the use of census data, and who lacks the traditional and requisite experience in managing a large organization like the Census Bureau and the complex operations of the decennial census.

We urge the administration to put forward candidates for Census Director and Census Bureau Deputy Director who will continue the tradition of strong, nonpartisan, experienced, and strong leadership. Any nomination or appointment that would undermine the credibility of the Bureau's role as a fundamentally nonpartisan statistical agency will further erode already fragile public trust and confidence in the integrity of the 2020 Census and, indeed, the objectivity of all Census Bureau statistics.

Thirdly, the recent U.S. Department of Justice request to add a question about citizenship to the 2020 Census threatens the Census Bureau's ability to conduct an inclusive enumeration that accurately reflects the diverse fabric of America. The Constitution requires a count of all persons living in the United States on Census Day, regardless of citizenship or legal status. Since 1790, the decennial census has been the vehicle for this count and, to this day, Congress has rejected efforts to change the interpretation of this important tenet of the Constitution by basing apportionment on a subset of the population.

The Census Bureau spends years testing alternative questionnaire formats and designs. Changes to the census form at this late stage of 2020 Census planning jeopardize the validity of the operational tests that already have been conducted, put into question the outreach and partnership strategies that have been
designed around different content, and would require changes in training and execution of operations. Robust, iterative testing of census methods and content is crucial to an accurate enumeration, with even the smallest changes to question order and wording potentially having adverse and unintended consequences for the success of operations and the accuracy of the data.

There are logistical and cost implications associated with adding a new question at this late point in the 2020 Census cycle. For example, the 2020 Census Operational Plan bases staffing levels on projected self-response rates that, in turn, the Bureau derived after carefully designed, iterative tests that did not include a question on citizenship. Adding a new question will nullify those prior projections and assumptions. Moreover, experts, elected officials, and community leaders all agree that adding a question on citizenship in particular will lower initial response, leading to an expanded Nonresponse Follow-up operation and increases in the field staff required to conduct door-to-door visits, thereby increasing the cost of the census considerably without improving accuracy.

Adding a citizenship question to the decennial census would not promote the constitutional mandate of the census, but in fact, may compromise it. Such a question would increase the burden on respondents, likely heighten privacy concerns around the census, and lower participation by immigrants who fear the government will use this information to harm them and their families. Furthermore, the Justice Department has not set forth new legal or programmatic reasons for the Census Bureau to collect this information from every household in the country since its initial cataloguing of data requirements for the census and American Community Survey prior to the Census Bureau’s submission of 2020 Census and ACS topics to Congress last spring.

We urge you to reject the Justice Department’s request to add a citizenship question to the decennial census and to ensure that the Census Bureau can focus its time and resources on finalizing and executing the current 2020 Census plan.

Thank you for your attention to our concerns. We look forward to working closely with you to ensure the fair and accurate census our communities expect and deserve.

Sincerely,

Tom Cochran
CEO and Executive Director
January 30, 2018

The Honorable Wilbur Ross
Secretary of Commerce
U.S. Department of Commerce
1401 Constitution Ave, NW
Washington, DC 20230

Re: OPPPOSE – DOJ Request to Add a Question on Citizenship to the 2020 Census

Dear Secretary Ross:

On behalf of the Monterey County Board of Supervisors, I write to express our opposition to the Department of Justice's (DOJ) request to add a question on citizenship to the 2020 Census. DOJ's stated rationale for its request – that it needs better citizenship data to better enforce the Voting Rights Act (VRA) "and its important protections against racial discrimination in voting" – belies the Department's hostile policies toward immigrants and will likely depress responses in immigrant communities.

DOJ's claims that the citizenship question is needed to enforce Section 2 of the VRA and to prevent racial discrimination in voting are unfounded. The Census Bureau already collects information on citizenship through the American Community Survey (ACS). This ongoing yearly survey provides more detailed information than the decennial Census, which enables the Census to focus more on population counts. The ACS' reliable citizenship data was used in 2010 by both DOJ and civil rights groups to monitor compliance with the VRA and will once again be utilized for the same purpose in 2020.

The Trump administration's aggressive immigration policies have already instilled fear among immigrant communities. Immigrant communities are less likely to report crimes, or even enroll their eligible U.S. citizen children in government health and nutrition programs. Early surveys have documented that some immigrants are afraid to provide information, or have given false information, to Census employees because they are fearful of how the information may be used. This is a concerning trend and would no doubt be worsened if a citizenship question was included in the 2020 Census.
Given the critical importance of the decennial census to distributing the number of seats in the U.S. House of Representatives and drawing congressional and state legislative district lines, as well as allocating billions of dollars in federal funding to states and local governments, we urge you to oppose the DOJ's request for a citizenship question in the 2020 Census. As you work to ensure a fair and accurate census that encourages full participation, we believe that including a citizenship question would only serve to suppress participation and result in inaccurate data that does not truly reflect the makeup of our nation.

Sincerely,

Luis Alejo
Chair, Board of Supervisors

Cc: The Honorable Dianne Feinstein
The Honorable Kamala Harris
The Honorable Jimmy Panetta
March 1, 2018

Mr. Luis Alejo
Chair, Board of Supervisors
Monterey County
168 West Alisal Street
Salinas, CA 93901

Dear Mr. Alejo:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a full, fair, and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I reported back to Congress last October after I conducted a rigorous deep dive to produce a new 2020 Census life cycle cost estimate as well as a thorough review of Census Bureau programming and financial management. I have assembled a multidisciplinary team to address and remedy concerns expressed by the Government Accountability Office, the Department of Commerce’s Office of Inspector General, the Office of Management and Budget, and Congressional members. In addition, I have put into place the people, processes, and programs to ensure strong governance and oversight of the 2020 Census.

If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross
FROM: Bailey, Amanda Gray  
SENT: Tuesday, February 06, 2018 5:38 PM  
TO: [REDACTED]  
SUBJECT: Congressional Inquiry - Climino-Johnson - VA10

Good afternoon Mr. Edwards,

Could you please review the attached correspondence on behalf of Mr. Climino-Johnson? Any guidance would be greatly appreciated.

Sincerely,

Amanda Gray

Amanda Gray Bailey  
Congresswoman Barbara Comstock (VA-10th)

https://outlook.office365.com/owa/boc.correspondence.quality.assurance@census.gov/?vie...  2/12/2018
Dear Representative Comstock, I write today to express deep concern about a request the Department of Commerce recently received from the Department of Justice to include a citizenship question on the 2020 Census. I have written to Secretary Ross to express my strong hope that he will reject this proposal. I am writing to you as well to request that you do everything in your power to ensure that a citizenship question is not added to the census. Should such a proposal be favorably received, the integrity of the 2020 Census data will be fundamentally compromised. Including a citizenship question is likely to keep some people from responding to the questionnaire and others from responding truthfully, thereby undermining the accuracy of the data. The import of an accurate census cannot be understated. An accurate census allows policy-makers in public, private, and non-profit sectors to make evidence-based decisions. The Census Bureau is required to submit the questions for the 2020 Census to Congress by April 1, 2018. Please urge Commerce Secretary Ross to exclude a citizenship question. If the Census Bureau submits a citizenship question to Congress, I urge you to support legislation that would strike it from the final questionnaire. Please ensure that the 2020 Census is undertaken with integrity. Thank you for your thoughtful consideration of this matter.

Regards, Todd Cimino-Johnso
February 6, 2018

The Honorable Wilbur Ross  
Secretary of Commerce  
U.S. Department of Commerce  
1401 Constitution Avenue NW  
Washington, DC 20230

Dear Secretary Ross,

It is hard to exaggerate the importance of a successful decennial census for municipalities across our nation. Census results determine the number of seats each state has in the House of Representatives, are used to draw political districts at federal, state and local levels, and affect the distribution of billions of dollars of federal funding annually to local communities for infrastructure and vital services like hospitals and schools. An inaccurate census leads to underrepresentation and fewer dollars for many of our most vulnerable communities.

We share the goal you have set for a full, fair and accurate 2020 Census. As such, we want to raise three areas of concern with you: adequate funding; qualified Census Bureau leadership; and rejecting untested questions that threaten to undermine census preparations and accuracy.

First, ensuring that the 2020 Census has the necessary resources to meet the challenges of enumerating a geographically, economically, culturally, and linguistically diverse population is foundational to its success. The Census Bureau must be able to implement effectively the range of data collection methods the 2020 Census will include, including new Internet and telephone response options and a traditional paper questionnaire. We were pleased that you requested an additional $187 million for the Census Bureau in Fiscal Year (FY) 2018, for a total of $1.684 billion, in order to fund IT systems development (e.g. scalability; cybersecurity systems) and system integration and readiness for the 2018 End-to-End Census Test.

However, this proposed increase does not include any additional funding for the Integrated Partnership and Communications program, which is essential to keeping long term census costs in check, given the growing barriers to a successful census. We are facing unprecedented challenges to a fair, accurate, and cost-effective census. Factors that could depress self-response rates considerably include the perception of cyber-security risks; real cyber-security threats; the
digital divide affecting rural, low income, minority, and older households; growing climate of fear among immigrants, regardless of their legal status; and growing anti-government sentiment in some communities.

To address these challenges, we urge additional resources to increase the number of Partnership Specialists in FY 2018 from the current 43 to 200, to help educate and guide state and local governments and vital “trusted voices” at the local level as they prepare to support the work of the Census Bureau during final preparations and early promotion in 2019 and execution of the count in 2020. Given the lower projected self-response rate embodied in your revised lifecycle cost estimate, we also urge a concurrent increase in the number of Area Census Offices, from the planned 248 to 300, to open in FY 2019. Finally, we believe new Census Bureau research documenting the growing reluctance of immigrants to participate (fully, if at all) in surveys and census tests will require expanded research and testing of effective messages and communications avenues to overcome this significant barrier to an inclusive enumeration.

We urge you to work closely with Congress in the coming weeks to ensure that the final FY 2018 omnibus appropriations bill includes not only the additional $1.684 billion adjusted allocation the administration requested for the Census Bureau, but additional funds to expand the number of Partnership Specialists in 2018, expand messaging research and testing before the early communications campaign begins at the start of 2019, and a larger field footprint to enhance a projected higher number of households that require personal visits in the Nonresponse Follow-up operation.

Secondly, the Census Bureau has long benefited from exceptional leadership, helping the agency carry out its mission of serving as the leading source of quality data about the nation’s people and economy. The American people must have confidence that the Bureau’s leaders will uphold its core principles of protecting confidentiality, sharing expertise, and conducting its work openly and fairly, without regard to partisan interests, and be guided by a commitment to scientific objectivity and excellence and research-based innovation.

Now, more than ever, the Census Bureau needs strong, permanent leadership to steer the agency through crucial preparations and implementation of the 2020 decennial count. To that end, we urge the president to nominate a highly qualified, nonpartisan candidate who is respected on both sides of the political aisle to be Census Director. At the same time, we are troubled by the administration’s reported intent to appoint a candidate for Census Bureau deputy director whose body of professional work largely centers around achieving partisan advantage in the use of census data, and who lacks the traditional and requisite experience in managing a large organization like the Census Bureau and the complex operations of the decennial census.

We urge the administration to put forward candidates for Census Director and Census Bureau Deputy Director who will continue the tradition of nonpartisan, experienced, and strong leadership. Any nomination or appointment that would undermine the credibility of the Bureau’s role as a fundamentally nonpartisan statistical agency will further erode already fragile public trust and confidence in the integrity of the 2020 Census and, indeed, the objectivity of all Census Bureau statistics.

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Thirdly, the recent U.S. Department of Justice request to add a question about citizenship to the 2020 Census threatens the Census Bureau’s ability to conduct an inclusive enumeration that accurately reflects the diverse fabric of America. The Constitution requires a count of all persons living in the United States on Census Day, regardless of citizenship or legal status. Since 1790, the decennial census has been the vehicle for this count and, to this day, Congress has rejected efforts to change the interpretation of this important tenet of the Constitution by basing apportionment on a subset of the population.

The Census Bureau spends years testing alternative questionnaire formats and designs. Changes to the census form at this late stage of 2020 Census planning jeopardize the validity of the operational tests that already have been conducted, put into question the outreach and partnership strategies that have been designed around different content, and would require changes in training and execution of operations. Robust, iterative testing of census methods and content is crucial to an accurate enumeration, with even the smallest changes to question order and wording potentially having adverse and unintended consequences for the success of operations and the accuracy of the data.

There are logistical and cost implications associated with adding a new question at this late point in the 2020 Census cycle. For example, the 2020 Census Operational Plan bases staffing levels on projected self-response rates that, in turn, the Bureau derived after carefully designed, iterative tests that did not include a question on citizenship. Adding a new question will nullify those prior projections and assumptions. Moreover, experts, elected officials, and community leaders all agree that adding a question on citizenship in particular will lower initial response, leading to an expanded Nonresponse Follow-up operation and increases in the field staff required to conduct door-to-door visits, thereby increasing the cost of the census considerably without improving accuracy.

Adding a citizenship question to the decennial census would not promote the constitutional mandate of the census, but in fact, may compromise it. Such a question would increase the burden on respondents, likely heighten privacy concerns around the census, and lower participation by immigrants who fear the government will use this information to harm them and their families. Furthermore, the Justice Department has not set forth new legal or programmatic reasons for the Census Bureau to collect this information from every household in the country since its initial cataloguing of data requirements for the census and American Community Survey prior to the Census Bureau’s submission of 2020 Census and ACS topics to Congress last spring.

We urge you to reject the Justice Department’s request to add a citizenship question to the decennial census and to ensure that the Census Bureau can focus its time and resources on finalizing and executing the current 2020 Census plan.

Thank you for your attention to our concerns. We look forward to working closely with you to ensure the fair and accurate census our communities expect and deserve.

Sincerely,
New Orleans Mayor Mitchell J. Landrieu
Columbia Mayor Steve Benjamin
New York Mayor Bill de Blasio
Los Angeles Mayor Eric Garcetti
Houston Mayor Sylvester Turner
Baltimore Mayor Catherine E. Pugh
Mesa Mayor John Giles
Rochester Hills Mayor Bryan K. Barnett
Somerset Mayor Jeffrey Z. Slavin
Albany Mayor Kathy M. Sheehan
East Hartford Mayor Marcia A. Leclerc
Dayton Mayor Nan Whaley
West Sacramento Mayor Christopher Cabaldon
Madison Mayor Paul R. Soglin
Chapel Hill Mayor Pam Hemminger
Allentown Mayor Ed Pawlowski
Philadelphia Mayor Jim Kenney
Duluth Mayor Emily Larson
Knoxville Mayor Madeline Anne Rogero
Sacramento Mayor Darrell Steinberg
Torrance Mayor Patrick J. Furey
Abington Mayor Wayne C. Luker
Austin Mayor Steve Adler
Tukwila Mayor Allan Ekberg
New Bedford Mayor Jon Mitchell
Kinston Mayor Dontario 'Don' Hardy
Lima Mayor David J. Berger
Henderson Mayor Debra March
Union City Mayor Carol Dutra-Vernaci
Niagara Falls Mayor Paul A. Dyster
Rocklin Mayor Ken Broadway
Schenectady Mayor Gary R. McCarthy
Fremont Mayor Lily Mei

South Bend Mayor Pete Buttigieg
Everett Mayor Cassie Franklin
Rochester Mayor Lovely A. Warren
San Jose Mayor Sam Liccardo
Boulder Mayor Suzanne 'Zan' Jones
Newark Mayor Alan L. Nagy
Corvallis Mayor Biff Traber
Culver City Mayor Jeffrey Cooper
Lansing Mayor Andy Schor
Clarksville Mayor Kim McMillan
Wheat Ridge Mayor Bud Starker
Columbus Mayor Andrew J. Ginther
Fayetteville Mayor Lionel Jordan
Hartford Mayor Luke Bronin
Santa Ana Mayor Miguel A. Pulido
Lincoln Mayor Chris Beutler
Sumter Mayor Joseph T. McElveen Jr.
Watsonville Mayor Lowell Hurst
Tempe Mayor Mark W. Mitchell
Augusta Mayor Hardie Davis Jr.
Burlington Mayor Miro Weinberger
Dallas Mayor Mike Rawlings
Gary Mayor Karen M. Freeman-Wilson
Cincinnati Mayor John Cranley
Denver Mayor Michael B. Hancock
Burnsville Mayor Elizabeth B. Kautz
Reno Mayor Hillary Schieve
Weston Mayor Daniel J. Stermer
Beaverton Mayor Denny Doyle
Napa Mayor Jill Techatl
Sunland Park Mayor Javier Perea
Beverly Hills Mayor Lili Bosse
Asheville Mayor Esther E. Manheimer
Pembroke Pines Mayor Frank C. Ortis
Charleston Mayor John J. Tecklenburg
Las Vegas Mayor Carolyn G. Goodman
Muskegon Mayor Steve Gawron
Pittsburgh Mayor William Peduto
Piscataway Mayor Brian C. Wahler
Minnetonka Mayor Brad Wiersum
Washington Mayor Muriel Bowser
Little Rock Mayor Mark Stodola
Phoenix Mayor Greg Stanton
Cupertino Mayor Darcy Paul
Seattle Mayor Jenny A. Durkan
Arlington Mayor Jeff Williams
Frankfort Mayor William May
Evanston Mayor Stephen H. Hagerty
Sheboygan Mayor Michael Vandersteen
West Hartford Mayor Shari Cantor
Cleveland Mayor Frank G. Jackson
Elizabeth Mayor J Christian Bollwage
San Leandro Mayor Pauline Russo Cutter
Pullman Mayor Glenn A. Johnson
Louisville Mayor Greg Fischer
Highland Park Mayor Nancy Rodkin Rotering
Salt Lake City Mayor Jackie Biskupski
West Hollywood Mayor John Heilman
Santa Monica Mayor Ted Winterer
Camuy Mayor Edwin Garcia Feliciano
Newport News Mayor McKinley L. Price DDS
Alexandria Mayor Allison Silberberg
Atlanta Mayor Keisha Lance Bottoms
Berkeley Mayor Jesse Arreguin
Bloomington Mayor John Hamilton
Boston Mayor Martin J. Walsh
Buffalo Mayor Byron W. Brown
Central Falls Mayor James A. Diossa
Chula Vista Mayor Mary Casillas Salas
College Park Mayor Patrick L. Wojahn
Dolton Mayor Riley H. Rogers
Findlay Mayor Lydia L. Mihalik
Goodyear Mayor Georgia Lord
Holyoke Mayor Alex B. Morse III
Jackson Mayor Pete Muldoon
Jackson Mayor Chokwe Antar Lumumba Esq.
Jamestown Mayor Samuel Teresi
Kansas City Mayor Sylvester 'Sly' James Jr.
Las Cruces Mayor Kenneth D. Miyagishima
Long Beach Mayor Robert Garcia
Medford Mayor Stephanie Muccini Burke
Minneapolis Mayor Jacob Frey
New Haven Mayor Toni N. Harp
New Rochelle Mayor Noam Bramson
Newark Mayor Ras J. Baraka
Normal Mayor Chris Koos
Oakland Mayor Libby Schaaf
Princeton Mayor Liz Lempert
Providence Mayor Jorge O. Elorza
Richmond Mayor Thomas K. Butt
Santa Clara Mayor Lisa M. Gillmor
Santa Fe Mayor Javier Gonzales
Skokie Mayor George C. Van Dusen
Somerville Mayor Joseph A. Curtatone
State College Mayor Don M. Hahn
Stockton Mayor Michael D. Tubbs
Tacoma Mayor Victoria Woodards
Tucson Mayor Jonathan Rothschild
Yonkers Mayor Mike Spano
Paterson Mayor Jane E. Williams-Warren
Fort Wayne Mayor Thomas 'Tom' C. Henry
Anaheim Mayor Tom Tait
Everett Mayor Carlo DeMaria Jr.
Portland Mayor Ted Wheeler
Dubuque Mayor Roy D. Buol
Livermore Mayor John P. Marchand
Baton Rouge Mayor Sharon Weston Broome
Brighton Mayor William W. Moehle
Saratoga Mayor Mary-Lynne Bernald
Charlotte Mayor Vi Alexander Lyles
Lakewood Mayor Adam A. Paul
Gurnee Mayor Kristina Kovarik
White Plains Mayor Thomas M. Roach
Hamtramck Mayor Karen Majewski

College Station Mayor Karl Mooney
St. Louis Mayor Lyda Krewson
Orlando Mayor Buddy Dyer
Lakewood Mayor Diane DuBois
San Antonio Mayor Ron Nirenberg
Santa Cruz Mayor David Terrazas
Foster City Mayor Sam Hindi
Stamford Mayor David Martin
Takoma Park Mayor Kate Stewart
Arvin Mayor Jose Gurrola
Dillon Mayor Kevin Burns
Pleasant Ridge Mayor Kurt R Metzger
West Wendover Mayor Daniel J Corona
Jersey City Mayor Steven M. Fulop
February 8, 2018

The Honorable Wilbur Ross  
United States Department of Commerce  
1401 Constitution Ave NW  
Washington, D.C. 20233-0001

Re: Request to Reinstate Citizenship Question on 2020 Census Questionnaire

Dear Secretary Ross:

As the Chief Legal Officer of the State of Louisiana, I write concerning a matter that is very important to the People of Louisiana. The use of the decennial Census to capture accurate data concerning citizenship, legal immigration, illegal immigration, and the distribution of the population is crucial to the functions of State government. It is also crucial in terms of insuring fair and equitable districting of the people’s representatives at the State and local level. This issue touches the heart of our democracy and the constitutional rights of every Louisiana citizen.

As you are aware, from 1970 to 2000, the Census Bureau included a citizenship question on the “long form” questionnaire sent to nearly one in every six households during each decennial census. After the 2000 Census, the Census Bureau ceased using the “long form” questionnaire. Instead, it replaced this form with the American Community Survey (ACS). The ACS is currently the Census Bureau’s only survey that collects information regarding citizenship and estimates citizen voting-age population. The ACS is sent to far fewer people – approximately one in every thirty-eight households each year, significantly changing the statistical integrity of the data. The ACS, while insufficient for a number of reasons, most importantly provides only estimates with a high margin of error.

Because it is standard practice for States to apportion their legislative districts on the basis of the numbers provided by the Census Bureau’s decennial census, this issue is of critical importance. See Nat’l Conf. of State Legislatures Redistricting Law 2010 at 11 (2009). States frequently even find themselves mired in federal litigation lasting from one Census to the next. Currently, the decennial Census counts everyone regardless of the individual’s legal status and no longer provides any reliable citizenship data. Ultimately, this process dilutes the votes of all legally-eligible voters by improperly counting those ineligible to vote when determining the population for representative districts. Not only does this result in bolstering the representation of illegal immigrants and non-voting legal immigrants at the expense of the voting age citizenry, but also skews the data nationally and can result in some states losing representatives in Congress to other States.
Furthermore, the Supreme Court has held that Section 2 of the Voting Rights Act prohibits "vote dilution" by state and local jurisdictions engaged in redistricting, which can occur when a racial group is improperly deprived of a single-member district in which it could form a majority. See *Thornburg v. Gingles*, 478 U.S. 30, 50 (1986). Multiple federal courts of appeals have held that, where citizenship rates are at issue in a vote-dilution case, citizen voting-age population is the proper metric for determining whether a racial group could constitute a majority in a single-member district. See, e.g., *Reyes v. City of Farmers Branch*, 586 F.3d 1019, 1023–24 (5th Cir. 2009); *Barnett v. City of Chicago*, 141 F.3d 699, 704 (7th Cir. 1998); *Negron v. City of Miami Beach*, 113 F.3d 1563, 1567–69 (11th Cir. 1997); *Romero v. Pomona*, 883 F.2d 1418, 1426 (9th Cir. 1989), overruled in part on other grounds by Townsend v. Holman Consulting Corp., 914 F.2d 1136 (9th Cir. 1990). A more accurate decennial census, which should collect this data, would prevent the inevitable dilution of votes and further exposure of the states to endless litigation. The current use of ACS data puts States into a no-win situation where they cannot apportion representative districts in a manner that is consistent with the Constitution, the Voting Rights Act, or their own state redistricting laws.

It is clear that the intent of Section 2's prohibition "is to facilitate participation...in our political process" by preventing unlawful vote dilution on account of race. *Campos v. City of Houston*, 113 F.3d 544, 548 (5th Cir. 1997). Courts have reasoned that "[t]he right to vote is one of the badges of citizenship" and that "[t]he dignity and very concept of citizenship are diluted if noncitizens are allowed to vote." *Barnett*, 141 F.3d at 704. Thus, it would be the wrong result for a legislature or a court to draw a single-member district in which a numerical racial minority group in a jurisdiction was a majority of the total voting-age population in that district but "continued to be defeated at the polls" because it was not a majority of the citizen voting-age population. *Campos*, 113 F.3d at 548. As these cases show, for the U.S. Department of Justice to avert racial discrimination in voting and ensure adherence to the spirit of Section 2, it is vital that the "long form" citizenship question in the decennial Census provide the necessary citizen voting-age population data.

When the right of all citizens to cast a properly weighted vote is not protected, there is a resulting dilution of the voting power of citizens residing in districts that are home to a smaller number of nonvoting residents. Moreover, it incentivizes sanctuary cities by granting an electoral advantage at the expense of non-sanctuary cities. Voting is one of the most precious rights of citizenship. And yet, it is clear that representative districts with larger populations of illegal and non-voting legal immigrants have gained representation over those without.

Accordingly, I am imploring the Census Bureau to reinstate the citizenship question in the decennial 2020 Census to assist Louisiana and all other states in making a good faith effort to equalize districts in a method that ensures, as far as practicable, equality in the weight of votes.

Sincerely,

[Signature]

Jeff Landry
Louisiana Attorney General
March 19, 2018

The Honorable Jeff Landry  
Attorney General of Louisiana  
P.O. Box 94095  
Baton Rouge, LA  70804-4095

Dear Mr. Attorney General:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a complete and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I have conducted a rigorous review and produced a new 2020 Census lifecycle cost estimate, and I have put into place the people, processes, and programs necessary to ensure strong governance and oversight of the 2020 Census.

If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross

Wilbur Ross
February 8, 2018

The Honorable Wilbur Ross
Secretary of Commerce
U.S. Department of Commerce
1401 Constitution Ave NW
Washington, DC 20230

Dear Secretary Ross,

On behalf of the National League of Cities (NLC) and the more than 19,000 municipal governments we represent, we urge you to reject the Department of Justice’s (DOJ) request to add a new and untested citizenship question to the 2020 Census. The addition of such an untested question this late in the process would have a negative effect on participation and would drastically reduce the likelihood of an accurate count in many cities, towns and villages in every state.

America’s local leaders share your commitment to facilitating and executing a full, fair and accurate census in 2020. Since the first count in 1790, the census has tallied the total population of both non-citizens and citizens alike. Cities depend on the completion of a successful census for research, strategic planning, grant funding, economic development and congressional districting; a successful census depends on cooperation and participation by all residents of the United States.

The addition of a question that has not been tested in a contemporary census environment or as part of a radically redesigned census would not only be reckless and disruptive, but would also jeopardize the eight years of diligent preparations that have already gone into the 2020 census. Design of the upcoming census began in 2010, and since then all aspects of the census have undergone intense scrutiny and analysis to determine and prevent attrition in participation. The Census Bureau must submit the proposed questions for congressional review by March 31 of this year; the one and only end-to-end census test begins in Providence County, Rhode Island, next month, and will not include such a question. Given this timeframe, there is no conceivable way in which this addition could be vetted with the thoroughness demanded of such an
important consideration. Furthermore, the DOJ request would decrease the rate of self-response in many communities, thus raising the cost of nonresponse follow-up (NRFU) operations at a time when the Census Bureau is already under intense pressure to cut costs.

Experts from both sides of the aisle argue that the addition of a citizenship question would exacerbate privacy concerns, reduce participation and result in inaccurate responses. Four former Census Bureau directors who served under both Republican and Democratic administrations have backed these claims and concluded that such an addition would only lead to worse data. The issue would be compounded for more vulnerable minority populations who were undercounted at disproportionately high rates in 2010. Counts for citizens and non-citizens alike would be adversely impacted, particularly in mixed-status households. The DOJ’s request would add an unnecessarily intrusive question onto a census and spike fears about data confidentiality. This, coupled with a growing climate of fear, would undoubtedly suppress participation and threaten the accuracy of the decennial census in 2020 and the credibility of the Bureau for years to come.

Finally, the DOJ’s claim that the addition of a citizenship question is necessary to enforce the Voting Rights Act of 1965 is questionable and not borne out by the historical record. The Voting Rights Act has relied exclusively on citizenship data collected through robust but much smaller surveys, most recently the American Community Survey (ACS). For the past 53 years, the DOJ has reliably used data from other Census Bureau surveys to fully enforce the Voting Rights Act, leading us to seriously question the necessity for drastic changes made to the only constitutionally-mandated count of the nation’s population.

For the reasons outlined above, we urge you to join us and countless other civic leaders, businesses and academic institutions in rejecting the DOJ’s request to add a citizenship question to the 2020 census. If you have any additional questions, please contact Brian Egan, principal associate, federal advocacy at (202)-626-3107 or at egan@nlc.org.

Sincerely,
Clarence E. Anthony
CEO and Executive Director
National League of Cities

CC:
- Ron Jarmin, Acting Director of the U.S. Census Bureau
- Senator Ron Johnson, Chairman of the U.S. Senate Committee on Homeland Security and Governmental Affairs
- Senator Clair McCaskill, Ranking Member of the U.S. Senate Committee on Homeland Security and Governmental Affairs
- Congressman Trey Gowdy, Chairman of the U.S. House of Representatives Committee on Oversight and Government Reform
- Congressman Elijah Cummings, Ranking Member of the U.S. House of Representatives Committee on Oversight and Government Reform
March 6, 2018

Mr. Clarence E. Anthony  
Chief Executive Officer and Executive Director  
National League of Cities  
660 North Capitol Street, NW, Suite 450  
Washington, DC 20001

Dear Mr. Anthony:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a full, fair, and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I reported back to Congress last October after I conducted a rigorous deep dive to produce a new 2020 Census life cycle cost estimate as well as a thorough review of Census Bureau programming and financial management. I have assembled a multidisciplinary team to address and remedy concerns expressed by the Government Accountability Office, the Department of Commerce’s Office of Inspector General, the Office of Management and Budget, and Congressional members. In addition, I have put into place the people, processes, and programs to ensure strong governance and oversight of the 2020 Census.

If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross
February 9, 2018

Mr. Alan Lang
Acting Division Chief for Congressional Affairs
U.S. Department of Commerce
U.S. Census Bureau
Washington, DC 20233

Dear Mr. Lang:

I write on behalf of several of my constituents regarding a proposed question pertaining to U.S. citizenship status that the Census Bureau is considering adding to the 2020 Census. I have enclosed these letters for your review.

As these letters indicate, my constituents have specific concerns about how a question regarding U.S. citizenship status would affect the response rate and accuracy of the data collected by the Census. Like my constituents, I believe that such a question could lead to fewer respondents and less precision. This would harm the critical mission of the Census Bureau to get a full and accurate count of everyone present in the United States.

So much relies on a clear and accurate accounting of those present in our nation. From the correct apportionment of Congressional seats to the proper allocation of federal funding, the nation relies on the data collected during each decennial census. Businesses of all sizes also rely on this data to help inform decisions as to where to invest their resources. The accuracy of this critical information could be undermined if response rates are depressed through the addition of a question pertaining to citizenship.

Additionally, a Census question on citizenship is unnecessary as this information is already gathered through the American Community Survey (ACS). While it is important to have as much information as possible when making decisions impacting government policy, adding a question regarding citizenship status to the 2020 Census could well have the opposite effect.

I urge you to reject the request to include a question regarding citizenship status to the 2020 Census and instead to continue to gather this data as the Census Bureau has for more than a decade, through the ACS.

Thank you in advance for your attention to this matter, and I look forward to your prompt response.

Sincerely,

Jack Reed
United States Senator
I write today to express deep concern about a request the Department of Commerce recently received from the Department of Justice to include a citizenship question on the 2020 Census. I have written to Secretary Ross to express my strong hope that he will reject this proposal. I am writing to you as well to request that you do everything in your power to ensure that a citizenship question is not added to the census.

Should such a proposal be favorably received, the integrity of the 2020 Census data will be fundamentally compromised. Including a citizenship question is likely to keep some people from responding to the questionnaire and others from responding truthfully, thereby undermining the accuracy of the data.

The import of an accurate census cannot be understated. An accurate census allows policymakers in public, private, and non-profit sectors to make evidence-based decisions. The Census Bureau is required to submit the questions for the 2020 Census to Congress by April 1, 2018. Please urge Commerce Secretary Ross to exclude a citizenship question. If the Census Bureau submits a citizenship question to Congress, I urge you to support legislation that would strike it from the final questionnaire. Please ensure that the 2020 Census is undertaken with integrity.

Thank you for your thoughtful consideration of this matter.
February 28, 2018

The Honorable Jack Reed
United States Senate
Washington, DC 20510-3903

Dear Senator Reed:

Thank you for your recent inquiry regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. We appreciate your taking the time to make me aware of your position on this important matter.

The U.S. Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a complete and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority.

We will keep you apprised of any developments regarding the citizenship question. If you have any additional questions or would like to discuss this matter further, please contact our Office of Congressional and Intergovernmental Affairs at 301-763-6100.

Sincerely,

[Signature]

Ron S. Jarmin
Performing the Non-Exclusive Functions
and Duties of the Director
FEB 12 2018

The Honorable Mike Thompson
U.S. House of Representatives
Washington, DC 20515

Dear Representative Thompson:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. We appreciate your taking the time to make me aware of your position on this important matter.

The U.S. Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a full, fair, and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority.

We will keep you apprised of any developments regarding the citizenship question. If you have any additional questions or would like to discuss this matter further, please contact our Office of Congressional and Intergovernmental Affairs at 301-763-6100.

Sincerely,

Ron S. Jarmin
Performing the Non-Exclusive Functions
and Duties of the Director
February 12, 2018

The Honorable Wilbur Ross
Secretary of Commerce
U.S. Department of Commerce
1401 Constitution Avenue NW
Washington, DC 20230

Dear Secretary Ross,

We, the undersigned Attorneys General of New York, Massachusetts, California, Connecticut, Delaware, the District of Columbia, Hawaii, Illinois, Iowa, Maine, Maryland, Mississippi, New Jersey, New Mexico, Oregon, Pennsylvania, Rhode Island, Vermont, and Washington, as well as the Governor of Colorado, write to oppose the recent request by the Department of Justice to add a question on citizenship to the questionnaire for the 2020 decennial Census.1 Adding a citizenship question – especially at such a late date in the 2020 Census planning process – would significantly depress participation, causing a population undercount that would disproportionately harm states and cities with large immigrant communities. This undercount would frustrate the Census Bureau’s obligation under the Constitution to determine “the whole number of persons in each state,”2 threaten our states’ fair representation in Congress, dilute our states’ role in the Electoral College, and deprive our states of their fair share of hundreds of billions of dollars in federal funds that are allocated in part on decennial Census data. Indeed, as the Census Bureau has itself previously explained, “any effort to ascertain citizenship” in the decennial Census “will inevitably jeopardize the overall accuracy of the population count.”3

These tremendous harms are not justified by the Justice Department’s purported interest in strengthening enforcement of Section 2 of the Voting Rights Act. To the contrary, requesting citizenship data would undermine the purposes of the Voting Rights Act and weaken voting rights enforcement across the board.

For these reasons, we have serious concerns that adding a citizenship question to the 2020 Census at this late date would violate the Census Bureau’s obligations under the Constitution, the Administrative Procedure Act, and other federal statutes.

1 See Letter from Arthur E. Gary, General Counsel, Justice Management Division, U.S. Dep’t of Justice, to Ron Jarmin, Performing the Non-Exclusive Functions and Duties of the Director, U.S. Bureau of the Census, U.S. Dep’t of Commerce (Dec. 12, 2017), https://www.documentcloud.org/documents/4340651-Text-of-Dec-2017-DOJ-letter-to-Census.html [hereinafter DOJ Letter]. The Justice Department’s request that the Bureau “reinstate” a citizenship question on the Census, see id. at 1, is misleading, as no citizenship question has been included on the decennial census since 1950. From 1970 to 2000, a citizenship question was included only on the “long form” questionnaire, which was distributed to a sample of about one in six households in lieu of the decennial census questionnaire. Following the 2000 Census, the Census Bureau discontinued the “long form” questionnaire and replaced it with the American Community Survey, which is now sent to about one in every 38 households each year.

2 U.S. Const. amend. XIV, § 2; see also id. art. I, § 2, cl. 3.

Furthermore, the underfunding of the Census Bureau raises concerns that technology and implementation strategies will not be adequately developed before the start of the full 2020 Census. The lack of testing in rural areas is particularly disconcerting. We request your assurances that the Bureau will be able to cope with this funding crisis and provide a full and accurate enumeration of the population of each state.

I. Adding a citizenship question at this late date would fatally undermine the accuracy of the 2020 Census, harming the states and our residents. The Justice Department’s request should be rejected because adding a citizenship question to the 2020 Census would reduce participation and response rates, threatening the Census Bureau’s ability to comply with its obligations under the Constitution and harming the states’ interests.

1. Questions about citizenship would deter participation in the 2020 Census, undermining the constitutional mandate to conduct an “actual Enumeration.” The Constitution provides that Representatives “shall be apportioned among the several States . . . according to their respective Numbers,” which requires “counting the whole number of persons in each State.” This count is to be determined by an “actual Enumeration” conducted every ten years. It is well-settled that this “actual Enumeration” includes all residents, both citizens and noncitizens. A citizenship question would hinder the Census Bureau’s ability to complete this “actual Enumeration” by chilling participation in the 2020 Census by noncitizens and naturalized citizens alike.

The Census Bureau has long recognized the difficulty of counting immigrant and noncitizen communities. In preparing for the 2010 Census, the Bureau identified immigrants as one of several hard-to-count populations, and designed a significant public education campaign to increase participation from that group. Similarly, in the lead up to the current decennial Census, the Bureau organized a working group to recommend strategies to minimize undercounts of undocumented immigrants, as well as immigrant Latinos and Asians.

Notwithstanding these efforts, the difficulty of counting such groups has only increased in the current climate. Recent pretests by the Census Bureau have revealed that immigrant respondents increasingly expressed concerns about confidentiality and data sharing, especially

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4 Id. art. I, § 2, cl. 3.
5 Id. amend. XIV, § 2.
6 Id. art. I, § 2, cl. 3; see also 13 U.S.C. § 4 (delegating to the Secretary of Commerce authority to conduct the decennial census).
7 Klutznick, 486 F. Supp. at 575-77.
when asked questions about citizenship. Citing fears related to the current discourse on immigration policy, respondents have also refused to respond to questions and have ended interactions with surveyors. The Census Bureau has recognized that these anxieties might present a barrier to participation in the 2020 Census, and may diminish overall data quality. Even before the Department of Justice made its request, Census Bureau officials reported that early test surveys showed “an unprecedented groundswell in confidentiality and data-sharing concerns among immigrants or those who live with immigrants” related to the 2020 count. The Bureau already acknowledges that questions about citizenship in any federal statistical survey are sensitive and must be treated with care, adding a citizenship inquiry to the mandatory decennial Census would undoubtedly exacerbate these problems, leading to larger undercounts and less reliable data.

Indeed, in a brief filed with the Supreme Court less than three years ago, four former Directors of the Census Bureau – appointed by Presidents of both political parties – explained based on their experience that “a one-by-one citizenship inquiry would invariably lead to a lower response rate to the Census in general,” and would “seriously frustrate the Census Bureau’s ability to conduct the only count the Constitution expressly requires: determining the whole number of persons in each state in order to apportion House seats among the states.” The former Directors explained that “[r]ecent experience demonstrates lowered participation in the Census and increased suspicion of government collection of information in general. Particular anxiety exists among non-citizens. There would be little incentive for non-citizens to offer to the government their actual status; the result [of inquiring about citizenship status] would be a reduced rate of response overall and an increase in inaccurate responses.”

11 Id. at 2.
16 Id. at 5.
The Census Bureau in fact declined to add a citizenship question to the 2010 Census questionnaire, and has repeatedly warned against adding such a question to the decennial Census because of the risk of lower response rates and reduced accuracy. As the Census Bureau has explained, questions about “citizenship are particularly sensitive” for individuals who “perceive[] any possibility of the information being used against them,” and thus “any effort to ascertain citizenship will inevitably jeopardize the overall accuracy of the population count” required by the Constitution.

2. This threat to the accuracy of the 2020 Census is magnified by the extreme lateness of the Justice Department’s proposal. Even assuming it were possible to devise a citizenship inquiry that would not risk an unconstitutional undercount, it is far too late in the planning process for the Census Bureau to test and validate any such approach. The Bureau must meet a statutory deadline of March 31, 2018 – less than two months away – to submit its final questionnaire for the 2020 Census to Congress. Two months is insufficient time to design and test a question as sensitive as this one consistent with the guidelines that apply to federal statistical agencies.

By statute, the Office of Management and Budget (OMB) has responsibility for coordinating the federal statistical system, including to ensure “the integrity, objectivity, impartiality, utility, and confidentiality of information collected for statistical purposes.” OMB is also required to establish government-wide guidelines and policies regarding statistical collection methods. Consistent with these statutory obligations, OMB has published a number of Statistical Policy Directives that govern the data collection efforts of federal statistical agencies, including the Census Bureau. These guidelines require, among other obligations, that agencies “ensure that all components of a survey function as intended . . . by conducting a pretest

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19 Klutznick, 486 F. Supp. at 568.
20 13 U.S.C. § 141(f)(2) (providing, with respect to each decennial census, “the Secretary [of Commerce] shall submit to the committees of Congress having legislative jurisdiction over the census . . . not later than 2 years before the appropriate census date, a report containing the Secretary’s determination of the questions proposed to be included in such a census”); 13 U.S.C. § 141(a) (establishing April 1, 2020 as the decennial census date).
of the survey components or by having successfully fielded the survey components on a previous occasion.” OMB specifically recommends pretesting new components of a survey prior to a field test, and incorporating results into the final design.

In addition, the Census Bureau has further clarified the statistical standards it must utilize to address the agency’s unique methodological and operational challenges. These standards require that all data collection instruments be tested “in a manner that balances data quality and respondent burden,” and specifically require pretesting to ensure questions are not “unduly sensitive” and “do not cause undue burden.”

These requirements cannot reliably be met in the limited time available before the Census Bureau’s March 31 deadline. The Census Bureau already developed and approved its National Content Test in 2015, which it characterized as its “primary mid-decade opportunity to compare different versions of questions prior to making final decisions for the 2020 Census.” And the 2018 End-to-End Census Test – which the Census Bureau describes as the “culmination” of its years-long process of testing and validating all aspects of the decennial Census design – is already underway, having begun in August 2017. In short, there is insufficient time for the Census Bureau to conduct the extensive development and testing that would be required to comply with OMB guidelines for adding new questions to the 2020 Census while assuring its validity and accuracy. And as the Census Bureau has explained, conducting the Census with “untested and unproven procedures” would further undermine the Bureau’s ability to conduct “a timely, accurate” enumeration.

These concerns are heightened even further by the Census Bureau’s already-precarious fiscal position as it prepares for the 2020 Census. The Bureau is dramatically underfunded, and the addition of a citizenship question would add significantly to the overall price of completing the Census. The Bureau’s appropriated budget for Fiscal Year 2017 was roughly ten percent below its request, and was finalized seven months late. And the administration’s initial budget request for Fiscal Year 2018 proposed only a two percent increase for the Census Bureau over the previous year – well short of the resources needed for the Bureau to prepare adequately for

26 Id. at 7-8 reqs. A2-3 & A2-3.3.
29 Census Counts, at 49-50.
the decennial Census. Further exacerbating these budget constraints, the reduced response rates that a citizenship question would cause will result in vastly increased costs overall. Reduced response rates trigger an expensive in-person follow-up process, which could result in an estimated increase of hundreds of millions of dollars to the price tag for the 2020 Census.

Because of inadequate financial resources, unreliable cost estimates, information technology challenges, and other concerns, GAO has already placed the 2020 Census on its “High Risk List” of government programs at greatest risk of fraud, waste, abuse, and mismanagement. Adding the challenge of testing and validating a question on citizenship to the tremendous operational and planning challenges that the Census Bureau already faces would increase the risk of error and heighten the chance of an undercount in our states.

3. The states would be irreparably harmed by an inaccurate 2020 Census. By deterring participation in the Census, the proposed citizenship question would harm everyone, citizens and non-citizens alike.

First, an inaccurate 2020 Census could result in widespread malapportionment of the states’ representation in Congress. As noted, the Constitution requires that Representatives “shall be apportioned among the several States . . . according to their respective Numbers.” As provided by the Census Act, the Secretary of Commerce is required to use the decennial Census results to tabulate the total population by state and report those results to the President, who must then “transmit to the Congress a statement showing the whole number of persons in each State . . . and the number of Representatives to which each State would be entitled.” An undercount that fails accurately to report the “whole number of persons” in each state would result in an incorrect calculation of the number of Representatives to which each state is entitled, in violation of the Census Clause of the Constitution. Inaccurate data would also jeopardize the ability of the states – and all of our local jurisdictions – to comply with the Fourteenth Amendment’s one-person one-vote requirement when drawing district lines for everything from the state legislature to local city councils. Moreover, there would be no possibility of correcting this harm for at least a decade, when the next decennial Census takes place – and no

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31 See id. (noting that the Census Bureau’s funding increased 60 percent between 2007 and 2008 in advance of the 2010 Census).
33 U.S. Const. art. I, § 2, cl. 3.
36 See, e.g., Utah v. Evans, 536 U.S. 452, 459 (2002) (challenge by the State of Utah and its Congressional delegation to a Census Bureau methodology that resulted in Utah receiving one less Representative in Congress); Franklin v. Massachusetts, 505 U.S. 788, 790-91 (1992) (challenge by the Commonwealth of Massachusetts to the Census Bureau’s change in the method of counting overseas federal employees, which caused Massachusetts to receive one less seat in the House of Representatives).
way to undo the harm the states would suffer from a ten-year deprivation of their constitutional allotment of Representatives.

In addition, a Census undercount could affect state representation in the Electoral College. The Constitution assigns each state a number of electors equal to “the whole number of Senators and Representatives to which the State may be entitled in the Congress.” An undercount that affected the apportionment of Representatives would also misrepresent the number of electors each state should receive, thereby miscalculating each state’s proper role in selecting the President and Vice President.

This extraordinary harm to the fabric of our federal system would come with equally significant financial harm. Data derived from the decennial Census guide the geographic distribution of hundreds of billions of dollars in federal grant funds to states and local areas. According to one estimate, there are about 300 Census-guided federal grant programs, with total appropriations in Fiscal Year 2015 of approximately $700 billion. These programs include Medicaid, the Supplemental Nutritional Assistance Program (SNAP), Title I grants to local educational agencies under the Elementary and Secondary Education Act, formula grants for highway planning and construction, Section 8 housing choice vouchers, the Low-Income Home Energy Assistance Program, and more. In other words, a Census undercount would jeopardize critical federal funding the states need to provide health insurance, public education funding, food assistance, housing opportunities, energy assistance, and other services and support for millions of residents, regardless of citizenship status. Such widespread underfunding harms everyone, starting with the most vulnerable, including low-income communities and children.

The Census Bureau has both constitutional and statutory obligations to conduct an “actual enumeration.” Including a question on the 2020 Census that would manipulate the count by scaring people away from being counted – causing grave harm to the states and our residents – is inconsistent with those obligations.

II. Adding a citizenship question to the 2020 Census would hamper the goals of the Voting Rights Act. The Justice Department’s request for citizenship data asserts that this information is necessary to ensure compliance with Section 2 of the Voting Rights Act. In fact, voting rights compliance will be undermined – not enhanced – by the addition of a citizenship question to the 2020 Census. Because the Justice Department’s request is unsupported by its

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38 U.S. Const. art. II, § 2, cl. 2; see also id. amend. XII, amend. XXIII (allocating electors to the District of Columbia).


40 See id.

41 Cf. Dep’t of Commerce v. U.S. House of Representatives, 525 U.S. 316, 348 (1999) (Scalia, J., concurring) (noting that the purpose of a “genuine enumeration” is to accomplish “the most accurate way of determining population with minimal possibility of partisan manipulation”).
stated reason, adding a citizenship question would be arbitrary and capricious under the Administrative Procedure Act.42

1. Collecting citizenship data would undermine the goal of fair and effective representation for all communities, which the Voting Rights Act was enacted to protect. The purpose of the Voting Rights Act is to accomplish “nondiscriminatory treatment by government – both in the imposition of voting qualifications and the provision or administration of governmental services, such as public schools, public housing and law enforcement.”43 Any method of enumeration that predictably undercounts some communities – as the Justice Department’s proposal would do – will mean that those communities are not fairly represented when legislative seats are apportioned and district lines are drawn.

The Supreme Court has long made clear that legislators represent all constituents in the districts they serve, regardless of whether any particular individual is a citizen: “[T]he fundamental principle of representative government in this country” is “one of equal representation for equal numbers of people.”44 The Justice Department’s request should be rejected because it would undermine this fundamental principle.

2. Citizenship data from the decennial Census is unnecessary to enforce the vote-dilution prohibition in Section 2 of the Voting Rights Act. The Justice Department’s request should also be rejected because it is unsupported. The Justice Department contends that it needs a “reliable calculation of citizen voting-age population” (or “CVAP”) in order to enforce the vote-dilution prohibition of Section 2.45 But the Supreme Court has never held that citizen voting-age population is the proper measure for examining whether a minority group can constitute a majority in a single-member district (the first element of proving a vote-dilution claim).46 The Justice Department notes that in LULAC v. Perry, the Supreme Court “analyze[d] a vote-dilution claim by reference to citizen voting-age population,”47 but fails to note that in a subsequent Section 2 case – Bartlett v. Strickland – the Court assessed the vote-dilution inquiry in terms of

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42 See Motor Vehicle Mfrs. Ass’n v. State Farm Mut. Auto. Ins. Co., 463 U.S. 29, 43 (1983) (noting that an agency acts arbitrarily and capriciously when it “entirely fail[s] to consider an important aspect of the problem” or “offer[s] an explanation for its decision that runs counter to the evidence before the agency”).


44 Reynolds, 377 U.S. at 560-61; see also Evenwel v. Abbott, 136 S. Ct. 1120, 1131-32 (2016); Davis v. Bandemer, 478 U.S. 109, 132 (1986) (plurality opinion); Daly v. Hunt, 93 F.3d 1212, 1226 (4th Cir. 1996) (explaining that “people can affect what their representatives do in another way” besides voting: “through their right to petition their representatives to voice their concerns and interests on particular issues. This right is available to everyone, even those who are ineligible to vote.”).

45 DOJ Letter at 1.


47 DOJ Letter at 1 (citing LULAC v. Perry, 548 U.S. 399, 423-442 (2006)).
“voting-age population.”\textsuperscript{48} The question of the appropriate population measure in Section 2 vote-dilution cases is, at best, unsettled.\textsuperscript{49}

In addition, even if citizen voting-age population were required in all cases, adding a citizenship question to the Census would not give the Justice Department the “reliable calculation” of citizenship information it claims to need. The Census is of course only administered every ten years,\textsuperscript{50} so any CVAP figures from the decennial Census would quickly become outdated and less reliable over the course of the subsequent decade as a result of population shifts. And a citizenship question would not provide information sufficient to ascertain the precise number of eligible voters in a district because district residents might be ineligible to vote for other reasons, such as prior felony convictions.

In any event, the Census Bureau’s American Community Survey already collects citizenship data, and these estimates are available for the federal government to use as needed.

Indeed, Congress could not possibly have intended for effective Section 2 enforcement to depend on the availability of person-by-person citizenship data, because such data has never been available at any point since Section 2 has existed: not in 1965 when the Voting Rights Act was first enacted; not in 1982 when the Act was amended to clarify the vote-dilution standard; not in 1986 when the Supreme Court articulated the vote-dilution test in \textit{Thornburg v. Gingles}. Because the Justice Department’s request seeks data that has never before been required in Section 2 litigation – and that cannot reliably be collected in any event – it cannot credibly serve as the basis for major changes to the 2020 Census design that will undercut the accuracy of the constitutionally mandated enumeration.

### III. The addition of a question regarding citizenship to the 2020 Census is inconsistent with the Census Bureau’s Information Quality Guidelines.

The Information Quality Act ("IQA") requires agencies to ensure that the information they disseminate to the public is accurate, reliable, and objective.\textsuperscript{51} Consistent with this directive, the IQA requires OMB and other federal agencies to issue guidelines “ensuring and maximizing the quality, objectivity, utility, and integrity of information, including statistical information, disseminated by the agency.”\textsuperscript{52} Recognizing the critical importance of the information it disseminates, the

\textsuperscript{48} \textit{Bartlett v. Strickland}, 556 U.S. 1, 12 (2009) ("This case turns on whether the first Gingles requirement can be satisfied when the minority group makes up less than 50 percent of the voting-age population in the potential election district."); see also \textit{id.} at 18 ("Unlike any of the standards proposed to allow crossover-district claims, the majority-minority rule relies on an objective, numerical test: Do minorities make up more than 50 percent of the voting-age population in the relevant geographic area? That rule provides straightforward guidance to courts and to those officials charged with drawing district lines to comply with § 2.").

\textsuperscript{49} See, e.g., \textit{Sanchez v. State of Colo.}, 97 F.3d 1303, 1311 (10th Cir. 1996) ("Because Gingles advances a functional evaluation of whether the minority population is large enough to form a district in the first instance, the Circuits have been flexible in assessing the showing made for this precondition.").

\textsuperscript{50} U.S. Const. art. I, § 2, cl. 3; 13 U.S.C. § 141(a).


\textsuperscript{52} Id.; see also Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility and Integrity of Information Disseminated by Federal Agencies, 67 Fed. Reg. 8457 (Feb. 22, 2002).
Census Bureau has adopted particularly stringent agency-specific IQA guidelines. These guidelines provide detailed requirements that the Census Bureau must meet to ensure the “utility,” “objectivity,” “integrity,” and “transparency” of information from the decennial Census.\textsuperscript{53}

The Census Bureau’s IQA guidelines disfavor questions that diminish response rates. The Bureau’s guideline for ensuring “objectivity,” requires collection and dissemination of information that is “accurate, reliable and unbiased.”\textsuperscript{54} To achieve this end, the guideline requires the Census Bureau to utilize collection methods that “minimiz[e] respondent burden.”\textsuperscript{55} This concern recognizes that respondents may choose not to respond when confronted by a question that is unduly sensitive or burdensome.\textsuperscript{56} Burdensome questions may diminish the accuracy and reliability of data collected in surveys by driving down response rates. Indeed, the Census Bureau has acknowledged this very concern by adopting statistical standards that test for and revise these types of questions.\textsuperscript{57}

The addition of a question regarding citizenship will diminish overall response rates. As noted above, many immigrant and citizen groups are likely to be highly sensitive to the citizenship inquiry. Adding this question to the 2020 Census questionnaire would impose a high burden on these groups, dissuade many from responding, and impair the survey’s ultimate accuracy and reliability. As a result, by adding a citizenship inquiry to the questionnaire, the Census Bureau would hinder compliance with its own objectivity standard.

Moreover, the Census Bureau has not taken any steps to test the citizenship inquiry and its impact on potential respondents. The objectivity standard applies not only to the utilization of a particular data collection method, but also to the development of that method.\textsuperscript{58} As noted above, both OMB and the Census Bureau have adopted statistical standards that require pre-testing in the development of data collection methods and survey questions.\textsuperscript{59} To date, the Census Bureau has not engaged in any pretesting of the citizenship question. As a result, adoption of the citizenship question would conflict with the agency’s IQA guidelines, and the Census Bureau should reject requests to include that question on the 2020 Census questionnaire.

\textsuperscript{53} Information Quality Guidelines, U.S. Census Bureau (May 12, 2015), https://www.census.gov/about/policies/quality/guidelines.html.
\textsuperscript{55} Id.; Similarly, OMB’s statistical standards require the Census Bureau to design its data collection instruments and methods “in a manner that achieves the best balance between maximizing data quality . . . while minimizing respondent burden and cost.” Office of Mgmt. & Budget, Statistical Policy Directive No. 2, § 2.3 at 11.
\textsuperscript{56} U.S. Census Bureau, Statistical Quality Standards, at A2-3.3.
\textsuperscript{57} Id.
\textsuperscript{58} U.S. Census Bureau, Information Quality: Objectivity.
\textsuperscript{59} Office of Mgmt. & Budget, Statistical Policy Directive No. 2, § 1.4 at 9; U.S. Census Bureau, Statistical Quality Standards, ii.
IV. Conclusion. Fair, proportionate electoral representation in our democracy depends on valid Census data. The proposal to add a citizenship question to the 2020 Census questionnaire would defeat that goal, violate the Constitution, and undermine the purposes of the Voting Rights Act that the Justice Department claims it wants to protect. Because inclusion of a citizenship question would threaten the Census Bureau’s ability to conduct its constitutionally-mandated role, and would be arbitrary and capricious under the Administrative Procedure Act – causing significant, direct harm to our states and residents – we urge you to reject the Justice Department’s request.

Sincerely,

ERIC T. SCHNEIDERMAN
Attorney General of the State of New York

MAURA HEALEY
Attorney General for the Commonwealth of Massachusetts

XAVIER BECERRA
Attorney General of the State of California

GEORGE JEPSEN
Attorney General of the State of Connecticut

MATTHEW DENN
Attorney General of the State of Delaware

KARL A. RACINE
Attorney General for the District of Columbia

RUSSELL SUZUKI
Acting Attorney General of the State of Hawaii

LISA MADIGAN
Attorney General of the State of Illinois

/s Thomas Miller

THOMAS J. MILLER
Attorney General of the State of Iowa

JANET T. MILLS
Attorney General of the State of Maine
BRIAN FROSH  
Attorney General of the State of Maryland

JIM HOOD  
Attorney General of the State of Mississippi

GURBIR GREWAL  
Attorney General of the State of New Jersey

HECTOR H. BALDERAS  
Attorney General of the State of New Mexico

ELLEN F. ROSENBLUM  
Attorney General of the State of Oregon

JOSH SHAPIRO  
Attorney General of the Commonwealth of Pennsylvania  
/s Thomas Donovan

PETER KILMARTIN  
Attorney General of the State of Rhode Island

THOMAS J. DONOVAN, JR.  
Attorney General of the State of Vermont

BOB FERGUSON  
Attorney General of the State of Washington

cc:  The Honorable Mick Mulvaney  
Director, Office of Management and Budget

Arthur E. Gary  
General Counsel, Justice Management Division  
U.S. Department of Justice

Dr. Ron Jarmin  
Performing the Non-Exclusive Functions and Duties of the Director  
U.S. Bureau of the Census
March 13, 2018

The Honorable Eric T. Schneiderman  
Attorney General of the State of New York  
Office of the Attorney General  
The Capitol  
Albany, NY  12224-0341

Dear Mr. Attorney General:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a complete and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I have conducted a rigorous review and produced a new 2020 Census lifecycle cost estimate, and I have put into place the people, processes, and programs necessary to ensure strong governance and oversight of the 2020 Census.

If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross
March 13, 2018

The Honorable Maura Healey
Attorney General of the Commonwealth
of Massachusetts
1 Ashburton Place
Boston, MA 02108-1698

Dear Madam Attorney General:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross
March 13, 2018

The Honorable Xavier Becerra  
Attorney General of the State of California  
1300 I Street, Suite 1740  
Sacramento, CA 95814

Dear Mr. Attorney General:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
March 13, 2018

The Honorable John Hickenlooper
Governor of Colorado
Denver, CO 80203

Dear Governor Hickenlooper:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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Sincerely,

Wilbur Ross
March 13, 2018

The Honorable George Jepsen
Attorney General of the State of Connecticut
55 Elm Street
Hartford, CT 06106

Dear Mr. Attorney General:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
March 13, 2018

The Honorable Matthew Denn
Attorney General of the State of Delaware
Carvel State Office Building
820 North French Street
Wilmington, DE 19801

Dear Mr. Attorney General:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross

Wilbur Ross
March 13, 2018

The Honorable Karl Racine
Attorney General for the District of Columbia
441 4th Street, NW, Suite 1100S
Washington, DC 20001

Dear Mr. Attorney General:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
March 13, 2018

The Honorable Russell Suzuki
Acting Attorney General of the State of Hawaii
425 Queen Street
Honolulu, HI 96813

Dear Mr. Attorney General:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
March 13, 2018

The Honorable Lisa Madigan  
Attorney General of the State of Illinois  
James R. Thompson Center  
100 West Randolph Street  
Chicago, IL  60601

Dear Madam Attorney General:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
March 13, 2018

The Honorable Thomas Miller  
Attorney General of the State of Iowa  
Hoover State Office Building  
1305 East Walnut  
Des Moines, IA 50319

Dear Mr. Attorney General:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross

Wilbur Ross
March 13, 2018

The Honorable Janet Mills
Attorney General of the State of Maine
State House Station 6
Augusta, ME 04333

Dear Madam Attorney General:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
March 13, 2018

The Honorable Brian Frosh
Attorney General of the State of Maryland
200 St. Paul Place
Baltimore, MD 21202-2202

Dear Mr. Attorney General:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
March 13, 2018

The Honorable Jim Hood  
Attorney General of the State of Mississippi  
Department of Justice  
P.O. Box 220  
Jackson, MS 39205  

Dear Mr. Attorney General:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross

Wilbur Ross
March 13, 2018

The Honorable Gurbir Grewal  
Attorney General of the State of New Jersey  
Richard J. Hughes Justice Complex  
25 Market Street  
P.O. Box 080  
Trenton, NJ 08625

Dear Mr. Attorney General:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
March 13, 2018

The Honorable Hector Balderas  
Attorney General of the State of New Mexico  
P.O. Drawer 1508  
Santa Fe, NM 87504-1508

Dear Mr. Attorney General:

Thank you for your recent letter regarding the Department of Justice's request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross

Wilbur Ross
March 13, 2018

The Honorable Ellen Rosenblum
Attorney General of the State of Oregon
Justice Building
1162 Court Street, NE
Salem, OR 97301

Dear Madam Attorney General:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
March 13, 2018

The Honorable Josh Shapiro
Attorney General of the Commonwealth of Pennsylvania
Pennsylvania Office of Attorney General
Strawberry Square
Harrisburg, PA 17120

Dear Mr. Attorney General:

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Sincerely,

Wilbur Ross
March 13, 2018

The Honorable Peter Kilmartin  
Attorney General of the State of Rhode Island  
150 South Main Street  
Providence, RI 02903

Dear Mr. Attorney General:

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Sincerely,

Wilbur Ross
March 13, 2018

The Honorable Thomas Donovan, Jr.
Attorney General of the State of Vermont
109 State Street
Montpelier, VT 05609

Dear Mr. Attorney General:

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Sincerely,

Wilbur Ross
March 13, 2018

The Honorable Bob Ferguson
Attorney General of the State of Washington
1125 Washington Street, SE
P.O. Box 40100
Olympia, WA 98504-0100

Dear Mr. Attorney General:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

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Sincerely,

Wilbur Ross
February 15, 2018

The Honorable Wilbur Ross
Secretary of Commerce
U.S. Commerce Department
1401 Constitution Avenue NW
Washington, DC 20230

Dear Secretary Ross:

On behalf of the 10 undersigned Jewish organizations, we urge you to reject the Department of Justice’s harmful request to add a new citizenship question to the 2020 Census. This additional question is unnecessary and would fundamentally threaten the integrity and accuracy of the decennial census, with wide-ranging implications for our nation.

If the Census Bureau were to grant the Department of Justice’s request, it raises the likelihood of suppressing response rates from immigrant and other minority communities. From the ban on entry of immigrants from Muslim-majority countries to the termination of DACA, America’s immigrant communities feel increasingly vulnerable. A new Census question about citizenship will raise fears about such information now or in the future being used against them or their loved ones. This will potentially lower Census response rates and undermine the Census’s accuracy.

Depressed Census participation would have far reaching consequences, as the data gathered by the Census is relied upon to allocate federal funding and determine congressional representation. If communities with large immigrant populations are undercounted by the Census, the government’s ability to meet the needs of the American people through the provision of essential services and aid dollars will be thwarted. Further, the interests of immigrant communities would not be accurately represented in Congress if the congressional apportionment process is based upon flawed data, undermining our representative democracy.

The Justice Department stated that the addition of the citizenship question will facilitate enforcement the Voting Rights Act. However, the federal government continues to conduct the American Community Survey to obtain estimates of the citizen population, the data from which has been deemed suitable for use in Voting Rights Act enforcement cases. Since the inception of the decennial Census in 1790, it has counted citizens and non-citizens alike. It has not included questions about citizenship since 1960. Moreover, all questions that are included on the Census are carefully designed and tested to ensure that the data collected is accurate. Adding
a question to the Census at this stage of the planning process would disrupt preparation and increase costs, in addition to threatening the accuracy of the data.

Throughout history, the Jewish community has valued broad participation in civic life. Even in biblical times, Jewish leaders understood the importance of a fair and accurate census. The Torah tells us that in the wilderness of Sinai, God commanded Moses to take a head count of the people (Numbers 1:2). Our modern-day responsibility to support the engagement of all people in the life and well-being of our communities is no less significant.

Historically, the Census has undercounted people of color and immigrants. We urge you not to compound this problem and, instead, protect the integrity of the 2020 Census by rejecting the Department of Justice’s request to add a question about citizenship.

If you have any questions or wish to discuss this further, please contact Rabbi Jonah Pesner, Director of the Religious Action Center of Reform Judaism, at jpesner@rac.org or 202-387-2800.

Sincerely,

Anti-Defamation League
Bend the Arc Jewish Action
Central Conference of American Rabbis
Hadassah, the Women’s Zionist Organization of America, Inc.
Jewish Council for Public Affairs
Jewish Federations of North America
Jewish Women International
MAZON: A Jewish Response to Hunger
National Council of Jewish Women
Union for Reform Judaism

Matt Fidel
Legislative Assistant
Religious Action Center of Reform Judaism
(202) 387-2800 | mfidel@rac.org
twitter.com/TheRAC | facebook.com/TheRAC | instagram.com/theRACgram

Religious Action Center of Reform Judaism
Please share with OCIA and others as appropriate for a response. Please copy the Denver region.

From: Philadelphia Regional Office (CENSUS/PH)
Sent: Monday, February 12, 2018 5:38 PM
To: PHRO Geography List; PHRO RSM List
Subject: Fw: Census- Active Military

To whom it may concern,

Was hoping you could provide some background for our Staff on the recent citizenship questions (as instructed by DOJ) on the upcoming 2020 census. We got word that active military is going to be counted in the 2020 census. Is that true? I could not find any reference to military in the 2020 Census Operation Plan Exsum, other than the below excerpt from page 13:

| Federally Affiliated Americans Count | Obtain counts by home state of U.S. military and federal civilian employees stationed or deployed overseas and their dependents living with them. |

Any background you could provide would be extremely helpful....thank you.

V/r
JC

J.C. Henry
Defense Legislative Fellow
U.S. Senator Jon Tester
311 Hart Senate Office Building
February 15, 2018

The Honorable Secretary Wilbur Ross
U.S. Department of Commerce
1401 Constitution Avenue NW
Washington, DC 20230

Dear Secretary Ross:

The Constitutionality Accountability Center is a law firm, think tank, and action center dedicated to the text, history, and values of the Constitution. We write to urge you to reject the Department of Justice's request that you add a mandatory question to the 2020 Census asking all persons to divulge their citizenship status. The Constitution requires the Census Bureau to count all persons, not merely citizens. Adding a question on citizenship—particularly at this late juncture—threatens to undermine your constitutional duty to ensure that the 2020 Census counts all of the nation's people.

More than two centuries ago, our Constitution's Founders established a democracy premised on the idea that all persons—no matter where they are from—deserve equal representation. To ensure a proper count of the nation's population, the Constitution explicitly requires an "actual Enumeration" of the people.1 This itself was a revolutionary undertaking. "While other nations had attempted population counts, none had made the count itself an important method of maintaining democracy by mandating it through a founding document."2

The Constitution's Framers required a decennial Census directly in the Constitution to prevent partisan manipulation of our representative democracy. The Framers understood that "those who have power in their hands will not give it up while they can retain it. On the [c]ontrary we know they will always when they can rather increase it."3 Wary that those in power might try to undermine the promise of equal representation for all, the Framers were careful to write into the Constitution a "permanent and precise standard" for the Census—counting all persons—"as essential to ye. fair representation."4 As Hamilton insisted, "[a]n actual census or enumeration of the people must furnish the rule, a circumstance which

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1 U.S. Const., art. I, § 2, cl. 3.
3 1 Records of the Federal Convention 578 (Max Farrand ed., 1911).
4 Id.
effectively shuts the door to partiality and oppression."5 Thus, the Constitution imposes a clear duty: it requires a count of all people living in the United States.

The original Constitution’s promise of equal representation for all persons, however, was marred by the Three-Fifths Clause, which provided that for the purpose of determining representation in Congress, enslaved persons would be counted as three-fifths of a person. This guaranteed to slaveholding states additional representation based on the number of people held in bondage. But, nearly 80 years later, after a bloody civil war fought over slavery, the Fourteenth Amendment fixed this injustice and reaffirmed the need for an accurate count of all persons to apportion representatives among the states.

The Fourteenth Amendment requires apportioning representatives among the states “according to their respective numbers, counting the whole numbers of persons in each state,”6 reflecting that representation should be based “on the largest basis of population, counting every man, woman, and child.”7 “Numbers, not voters; numbers, not property, this is the theory of the Constitution.”8 During the debates over the Fourteenth Amendment, many in Congress sought a drastic change in our constitutional principles of equal representation, arguing that only citizens or voters should be counted in determining representation. The Framers of the Fourteenth Amendment decisively rejected those arguments. They insisted that “the whole immigrant population should be numbered with the people and counted as part of them.”9 As history shows, the purpose of the census required by the Constitution has never been to count citizens, but rather to count “the whole body of the people.”10

Adding a citizenship question to the 2020 Census would break faith with the Constitution’s mandate for a head count of the entire nation. It would also result in bad data, biasing congressional apportionment, redistricting, and funding decisions, for an entire decade. Former directors of the Census Bureau—appointed by Presidents of both parties—have recognized that “[d]irectly inquiring about citizenship status as part of the short form Census . . . would likely exacerbate privacy concerns and lead to inaccurate responses from non-citizens worried about a government record of their immigration status.”11 These concerns are even more pronounced for the 2020 Census. The Census Bureau’s own data demonstrates “an unprecedented groundswell in confidentiality and data sharing concerns, particularly among immigrants or those who live with immigrants.”12 To add a citizenship question runs directly counter to the constitutional duty on the Census Bureau to ensure a count that includes everyone.

The Department of Justice urges that a citizenship question is necessary to ensure compliance with the Voting Rights Act, but this is transparently false. Since the passage of the Voting Rights Act in 1965, the short form census or the census questionnaire has never asked the

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5 The Federalist No. 36, at 188 (Clinton Rossiter rev. ed. 1999).
6 U.S. Const., amend XIV, § 2.
7 Cong. Globe, 39th Cong. 1st Sess. 1280 (1866).
8 Id. at 2767.
9 Id. at 432.
10 Id. at 385.
American people to report their citizenship. A mandatory question on citizenship has never been necessary to ensure robust protection for the right to vote. This is a specious justification for undercutting what the Constitution mandates: a count of all the people.

Sincerely,

Elizabeth B. Wydra
President
Constitutional Accountability Center

David H. Gans
Director of the Human Rights, Civil Rights and Citizenship Program

cc: Donald F. McGahn, White House Counsel
Peter Davidson, General Counsel, Department of Commerce
The Honorable Ron Johnson Chairman, Senate Homeland Security and Governmental Affairs Committee
The Honorable Claire McCaskill Ranking Member, Senate Homeland Security and Governmental Affairs Committee
The Honorable Trey Gowdy Chairman, House Committee on Oversight and Government Reform
The Honorable Elijah Cummings Ranking Member, House Committee on Oversight and Government Reform
March 12, 2018

Ms. Elizabeth B. Wydra  
President  
Constitutional Accountability Center  
1200 18th Street, NW, Suite 501  
Washington, DC 20036

Dear Ms. Wydra:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a complete and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I have conducted a rigorous review and produced a new 2020 Census lifecycle cost estimate, and I have put into place the people, processes, and programs necessary to ensure strong governance and oversight of the 2020 Census.

If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross

Wilbur Ross
Dear Secretary Ross:

We write to demonstrate our strong support for requiring the decennial census to ask respondents about their citizenship status. Adding a citizenship question to the decennial census would result in American citizens being more accurately represented in Congress. In addition, such questions would finally provide for an accurate count of how many aliens, both legal and illegal, are residing in the United States.

For that purpose and in light of the vital role the decennial census plays in both representation and funding, I have introduced H.R. 3600, the Census Accuracy Act of 2017. Starting with the 2020 census, the bill would require a checkbox in any census questionnaire for respondents to indicate whether the respondent is: a citizen or national of the United States; lawfully admitted for permanent residence in the United States; an alien who otherwise has lawful status under the immigration laws; or none of these. This bill would also require that aliens be asked under which Federal program or provision of law they obtained legal status.

Members of Congress are not alone in their support for adding a citizenship question. It is our understanding that the Department of Justice recently requested that the Census Bureau add a citizenship question as a way to allow the department to better enforce the Voting Rights Act.

Again, we urge you to see that a citizenship question is added to the decennial census starting in 2020. Please let me know if you have any questions.

Steve King (IA-04)  
Ralph Norman (SC-05)
March 12, 2018

The Honorable Steve King
U.S. House of Representatives
Washington, DC 20515

Dear Representative King:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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We will keep you apprised of any developments regarding the citizenship question. If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross
March 12, 2018

The Honorable Ralph Norman
U.S. House of Representatives
Washington, DC 20515

Dear Representative Norman:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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We will keep you apprised of any developments regarding the citizenship question. If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross
March 12, 2018

The Honorable Ralph Abraham  
U.S. House of Representatives  
Washington, DC 20515  

Dear Representative Abraham:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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Sincerely,

Wilbur Ross
March 12, 2018

The Honorable Mo Brooks
U.S. House of Representatives
Washington, DC 20515

Dear Representative Brooks:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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Sincerely,

Wilbur Ross
March 12, 2018

The Honorable Tom McClintock  
U.S. House of Representatives  
Washington, DC 20515  

Dear Representative McClintock:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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Sincerely,

Wilbur Ross
March 12, 2018

The Honorable Andy Biggs  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Biggs:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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Sincerely,

Wilbur Ross
March 12, 2018

The Honorable Bill Posey
U.S. House of Representatives
Washington, DC  20515

Dear Representative Posey:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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We will keep you apprised of any developments regarding the citizenship question. If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross
March 12, 2018

The Honorable Glenn Grothman
U.S. House of Representatives
Washington, DC 20515

Dear Representative Grothman:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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We will keep you apprised of any developments regarding the citizenship question. If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross
March 12, 2018

The Honorable Bob Gibbs
U.S. House of Representatives
Washington, DC 20515

Dear Representative Gibbs:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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Sincerely,

Wilbur Ross
March 12, 2018

The Honorable Mike Johnson  
U.S. House of Representatives  
Washington, DC 20515  

Dear Representative Johnson:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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We will keep you apprised of any developments regarding the citizenship question. If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross

Wilbur Ross
Dear Secretary Ross,

I am writing in support of the Department of Justice's request that "a question regarding citizenship" be added to the decennial census of 2020. As you know, secretaries of state are the chief election officials of their respective states. There are a number of election-related reasons why it is essential that a citizenship question be added to the census.

Adding that question would be extremely helpful in ensuring that state and local jurisdictions are in compliance with the Voting Rights Act and are not discriminating through race-based vote dilution. In order to assess whether such vote dilution exists, it is necessary that a precise count of the number of citizens of voting age occur.

Adding a citizenship question will also be extremely helpful to secretaries of state across the country in the administration of elections. We need to know the exact number of citizens in our states in order to administrate elections fairly and to collect accurate data within our states regarding the percentage of voting-age citizens who are registered to vote.

A version of the citizenship question already appears on the American Community Survey that is conducted by the Census Bureau (question #8). A slight variation of that question needs to be added to the census. It is important that the question be phrased as follows:

Is this person a citizen of the United States?

☐ Yes, born in the United States
☐ Yes, born in Puerto Rico, Guam, the U.S. Virgin Islands, or Northern Marianas
☐ Yes, born abroad of U.S. citizen parent or parents
☐ Yes, U.S. citizen by naturalization – Print year of naturalization ______
☐ No, not a U.S. citizen – this person is a lawful permanent resident (green card holder)
☐ No, not a U.S. citizen – this person citizen of another country who is not a green card holder (for example holds a temporary visa or falls into another category of non-citizens)
This slight variation of ACS question #8 is absolutely essential if the new census question is to be maximally useful to federal state and local governments. The variation occurs in the final two categories, which serve to separate noncitizens into lawful permanent residents versus all other categories of noncitizens. It is important to know the number of lawful permanent residents because these individuals are part of population of continuous residents in a state, and are not temporarily present or illegally present. State governments (and the federal government) must have a reliable count of the number of citizens plus lawful permanent residents in order to fairly distribute public services and benefits.

An equally important reason to know the number of lawful permanent residents is because these individuals are the ones who are on the cusp of becoming U.S. citizens. If a jurisdiction is experiencing lower-than-average naturalizations of lawful permanent residents, that may indicate that discrimination against such noncitizens is occurring with the effect that they are discouraged from naturalizing. In addition, secretaries of state and county election officials need to know the number of lawful permanent residents in their jurisdictions in order to effectively plan for growth in the voting electorate (by purchasing election equipment, adding polling places, etc.).

For all of these reasons, I strongly support the Department of Justice request; and I specifically support the addition of the question as phrased above.

Yours sincerely,

[Signature]

Kansas Secretary of State
March 23, 2018

The Honorable Kris W. Kobach
Attorney General of Kansas
120 SW 10th Avenue, No. 1
Topeka, KS  66612

Dear Mr. Attorney General:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a complete and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I have conducted a rigorous review and produced a new 2020 Census lifecycle cost estimate, and I have put into place the people, processes, and programs necessary to ensure strong governance and oversight of the 2020 Census.

If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross
February 20, 2018
By USPS Express Mail

The Honorable Wilbur L. Ross, Jr.
Secretary of Commerce
U.S. Department of Commerce
1401 Constitution Avenue NW
Washington, D.C. 20230

John M. Mulvaney
Director of the Office of Management and Budget
725 17th Street, N.W.
Washington, D.C. 20503

Dear Secretary Ross and Director Mulvaney:

On behalf of 106 undersigned organizations throughout New York State, we are requesting that you reject any effort by the Department of Justice to add a question regarding citizenship to the 2020 decennial Census. To do otherwise, would severely undermine the accuracy and non-partisan legitimacy of the Census, impair the delicate trust between the community and the role of the Census, and skyrocket the cost of the Census.

A non-partisan, reliable and responsive 2020 Census is needed to ensure the proper distribution of over $600 billion in federal funding to communities across this country for needed schools, hospitals, housing, and transportation. For that reason, great effort has been expended by the Census to ensure questions will elicit both an accurate and high response rate, a process that has involved extensive screening, focus groups, and field tests. At this stage in the process, there is no time to add questions that have not been properly vetted, especially since citizenship is already included in the American Community Survey.

There is no doubt that adding a citizenship question to the decennial Census would pose a chilling effect and result in a significant undercount, particularly by already under-counted racial and ethnic minority groups, including immigrants and non-citizens. Such requests to bypass the process would only fuel distrust and concerns of the Census Bureau's obligation to keep the data confidential amid heightened anti-immigrant furor in the current, politically charged climate and the checkered history of the Bureau sharing data to aid the government in the internment of Japanese Americans during World War II and the post 9-11 targeting of Arabs, Muslims, and South Asians. Further, a high non-response rate to the Census, would result in exorbitant follow-up costs to do door-to-door canvassing to ensure an accurate count.
We are asking you to ensure the Census remains non-partisan and is not politicized, and to work with us to ensure an accurate decennial Census that involves maximum participation by the entire, diverse population that constitutes this great nation.

Sincerely,

Steven Choi, Esq.
Executive Director
New York Immigration Coalition

New York Statewide:

American Jewish Committee
Asian American Federation
CAIR-NY
Common Cause/New York
Greater New York Labor Religion Coalition
Japanese American Citizens League-New York
The Japanese American Association of New York Inc.
LatinoJustice, PRLDEF
NAACP Legal Defense & Educational Fund, Inc.
National Action Network (NAN)
New York Civil Liberties Union
New York Immigration Coalition
Omicron Chapter of Phi Iota Alpha
Retail, Wholesale and Department Store Union

New York City:

AJC NY
African Communities Together
Arab American Family Support Center
Asian Americans for Equality
Bangladeshi American Community Development and Youth Services
Brooklyn Defender Services
CAAAV-Organizing Asian Communities
Cabrini Immigrant Services of NYC
CHHAYA, CDC
Chinese American Planning Counsel
Chinese Progressive Association
Coalition of Asian-American IPA
Columbia Law School Latino/a Law Students Association
Nightline Peer Listening at Columbia College
Community Voices Heard
Damayan Migrant Workers Association
DRUM - Desis Rising Up & Moving
DSI International, Inc.
El Centro del Inmigrante
Emerald Isle Immigration Center
GlobeMed
Henry Street Settlement
Hunter Dream Team
Indo-Caribbean Alliance
Japanese American Social Services, Inc.
Korean American Youth Foundation
Masa-MexEd, Inc.
DuBois Bunche Center for Public Policy, Medgar Evers College, CUNY
Mexican Coalition for the Empowerment of Youth and Families
Mexican Student Association (MexSA)
MinKwon Center for Community Action
American Constitution Society at New York University School of Law
A/P/A Institute at New York University
New York University Asian Pacific American Coalition
Bengali Students Association, New York University
The Interfaith Students of Color Coalition, New York University
Generation Citizen @ New York University
Immigrant Justice Center, Elisabeth Haub School of Law at Pace University, John Jay Legal Services
Independent Drivers Guild
Latino Commission on AIDS
Latino Unidos Con Honor y Amistad @ New York University
Phi Chapter of Hermandad de Sigma Iota Alpha, Inc.
ProColumbia-New York University Chapter
NMIC
OCA-NY
OCA-APA Advocates-Long Island Chapter
Opportunities for a Better Tomorrow
People’s Theatre Project
Pilipino American Unity for Progress (UNIPRO)
Asian/American Center at Queens College (CUNY)
Queer Detainee Empowerment Project
Russian-speaking Community Council of Manhattan and the Bronx, Inc.
Safe Horizon Immigration Law Project
Sakhi for South Asian Women
SAPNA NYC
Shetu Inc.
South Asian Council for Social Services (SACSS)
Sunnyside Community Services
The Door-A Center of Alternatives
The Ghanaian Association of Staten Island, NY Inc.
United Neighborhood Houses
UNITEHERE Local 100
University Settlement
Viva Peru
Volunteers of Legal Service
Womankind

Long Island:

Dejus Center, Inc.
Long Island Wins
OCA-APA Advocates-Long Island Chapter

Upper and Lower Hudson Valley/Westchester:

Community Resource Center
Community Voices Heard
OCA-Westchester and Hudson Valley Chapter
Worker Justice Center of New York, Inc.

Northern New York:

Plattsburgh Cares

Central New York:

American Constitution Society-Cornell Law School Chapter
Tompkins County Immigrant Rights Coalition
Volunteers Lawyers Project of Onondaga County
Workers Center of Central New York

Western New York State:

ACCESS of WNY
Catholic Family Center
First Presbyterian Church of Buffalo
Greater Rochester Coalition for Immigration Justice
International Institute of Buffalo
Justice for Migrant Families
Kids for College
Legal Aid Society of Rochester
PUSH Buffalo
Sisters of St. Joseph of Rochester Office
University at Buffalo, SUNY
Wayne Action for Racial Equality
Western New York Council on Occupational Safety and Health (WNYCOSH)
Worker Justice Center of New York, Inc.

Outside New York State:

OCA-New Jersey Chapter
OCA-San Mateo Chapter
Wind of the Spirit, Immigrant Resource Center

cc:
New York Congressional Delegation
New York State Senate
New York State Assembly
New York City Council
New York Governor Cuomo
Buffalo Mayor Brown
Rochester Mayor Warren
Syracuse Mayor Walsh
New York City Mayor de Blasio
Nassau County Executive Curran
Suffolk County Executive Bellone
Westchester County Executive Latimer
March 23, 2018

Mr. Steven Choi, Esq.
Executive Director
New York Immigration Coalition
133 West 33rd Street
New York, NY 10001

Dear Mr. Choi:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate you taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a complete and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I have conducted a rigorous review and produced a new 2020 Census lifecycle cost estimate, and I now have in place the people, processes, and programs to ensure strong governance and oversight of the 2020 Census.

If you have any additional questions or would like to discuss this matter further, please contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross

Wilbur Ross
MinKwon Center, on behalf of APA VOICE  
136-19 41st Avenue 3rd Floor  
Flushing, NY 11355  

February 14, 2018  

Secretary of Commerce  
Atten: Honorable Wilbur L. Ross  
US Department of Commerce  
1401 Constitution Avenue NW  
Washington, D.C. 20230  

Dear Secretary Ross:  

On behalf of Asian Pacific Americans Voting & Organizing to Increase Civic Engagement (APA VOICE), a non-partisan civic engagement coalition consisting of 18 organizations in New York City which seeks to empower the Asian Pacific American community to build a just and inclusive society, we urge you to reject the Department of Justice’s untimely and unnecessary request to include a citizenship question on the 2020 Census.  

A fair and accurate census, and the collection of useful, objective data used to determine school districts, law enforcement precincts, hospitals, housing developments, community facilities, public services, federal funding, redistricting, and the equality of each vote, are among the most significant civil rights issues facing the country today.  

Asian Pacific Americans are the fastest growing population of any major racial or ethnic group, growing 72% between 2000 and 2016 (from 11.9 million to 20.9 million), and are consistently one of the most challenging hard to reach populations to count. Approximately two-thirds of Asian Pacific Americans are foreign-born, with roots from more than 20 countries, leading to a wide variety of languages spoken. Furthermore, one-in-five live in linguistic isolation, with nobody the age of 14 or older in the household who speaks English very well, adding another substantial obstacle to participation and accurate census enumeration.  

Adding a citizenship question at this time will negatively impact response rates and the accuracy among millions of United States residents, whether they are lawful permanent residents, asylees, refugees, Temporary Protected Status beneficiaries, visa holders, undocumented, or one of the 16.7 million people who have an undocumented family member living with them. Census Bureau representatives conducting field tests have already reported unprecedented fear among respondents. Out of fear, distrust, and concern for how the data collected will be used and shared, test respondents have been reported being visibly nervous, providing incomplete or incorrect
information about household members. Furthermore, as the 2020 Census topics were already submitted last March, introducing new topics this late in the process would add significant costs to an already constrained budget.

The goal of the census is to have an inclusive and accurate count of all United States residents, regardless of immigration status. Adding a citizenship question to the 2020 Census would disproportionately harm response rates from immigrant communities, and would shake public confidence in the statistical and political objectives of the Census Bureau’s work, including the accuracy and legitimacy of the data. However, not including the citizenship question would signal the Census Bureau’s autonomy and independence from other federal agencies, potentially boosting public confidence in the accuracy of the data, but more importantly, the integrity in how the data would be used. For such reasons, APA VOICE urges you to reject the Justice Department’s request to add a citizenship question to the 2020 Census.

APA VOICE consists of:
Asian American Legal Defense and Education Fund
Asian Americans for Equality
Adhikaar
Bangladeshi American Community Development and Youth Services
Coalition for Asian American Children and Families
Chhaya Community Development Corporation
Chinese American Planning Council
Chinese Progressive Association
Charles B. Wang Community Health Center
Coalition for Asian American Children and Families
Indo-Caribbean Alliance
MinKwon Center for Community Action
Organization of Chinese Americans-NY
Shetu
South Asian Council for Social Services
Pilipino American Unity for Progress
United Chinese Association of Brooklyn
YWCA of Queens
March 23, 2018

Ms. Margaret Fung  
Executive Director, Asian American  
Legal Defense and Education Fund  
99 Hudson Street, 12th Floor  
New York, NY 10013

Dear Ms. Fung:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a complete and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I have conducted a rigorous review and produced a new 2020 Census lifecycle cost estimate, and I have put into place the people, processes, and programs necessary to ensure strong governance and oversight of the 2020 Census.

If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross

001152
February 23, 2018

Secretary Wilbur Ross
United States Department of Commerce
1401 Constitution Ave., NW
Washington D.C. 20233

Dear Secretary Ross,

As Indiana’s Secretary of State and Chief Elections Officer, I am contacting you in support of the Department of Justice’s request that “a question regarding citizenship” be added to the decennial census of 2020. I believe that the addition of this question is essential to the election process in Indiana and across the country.

Adding this question to the decennial census in 2020 would be beneficial to secretaries across the country in conducting elections. It is imperative for secretaries to know the exact number of state citizens in order to properly and fairly administer elections and collect accurate data to calculate the percentage of voting-age citizens registered to vote. The addition of this citizenship question will enable secretaries to properly calculate the numbers of state citizens more efficiently and accurately.

Lastly, it is essential that secretaries and county officials know the correct number of residents qualified to vote in their jurisdictions in order to adequately prepare and plan elections. Purchasing and distributing election equipment and adding polling locations depends on increases and decreases in the voting electorate.

Therefore, I strongly support the Department of Justice’s request of “a question regarding citizenship” on the decennial census in 2020.

Sincerely,

Connie Lawson
Indiana Secretary of State
March 19, 2018

The Honorable Connie Lawson  
Secretary of State  
The State House  
200 West Washington Street, Room 201  
Indianapolis, IN 46204

Dear Madam Secretary:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a complete and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I have conducted a rigorous review and produced a new 2020 Census lifecycle cost estimate, and I have put into place the people, processes, and programs necessary to ensure strong governance and oversight of the 2020 Census.

If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross

Wilbur Ross
February 23, 2018

Dr. Ron Jarmin
Performing the Non-Exclusive Functions and Duties of the Director
U.S. Census Bureau
United States Department of Commerce
Washington, D.C. 20233-0001

Dear Dr. Jarmin:

I write on behalf of the Office of the Attorney General of Texas to support the reinstatement of a question regarding citizenship on the 2020 Census questionnaire. State legislatures depend on the Census to reapportion legislative districts, and they depend on citizenship data to ensure that those legislative districts comply with the Voting Rights Act. As you know, a question concerning citizenship appeared on the decennial census questionnaire for thirty years—from 1970 to 2000—before it was removed in 2010. Returning that question to the 2020 Census will give state legislatures the best available source of citizenship data to ensure that they carry out their constitutionally assigned reapportionment duties in accordance with federal law.

Among many other legal requirements, state legislative districts must comply with Section 2 of the Voting Rights Act, which forbids States to impose any voting practice “which results in a denial or abridgement of the right of any citizen of the United States to vote on account of race or color.” 52 U.S.C. § 10301(a). Section 2 has been interpreted to prohibit legislative districts that result in dilution of minority voting strength. To prove that a legislative districting plan results in vote dilution, a plaintiff must establish “the possibility of creating more than the existing number of reasonably compact districts with a sufficiently large minority population to elect candidates of [the minority group’s] choice.”1 To meet that standard, a plaintiff must provide an alternative plan with additional districts in which a minority group constitutes a voting majority, i.e., more than 50% of eligible voters.2

Citizen-voting-age population provides the best measure to determine whether a minority group crosses the 50% threshold. The Fifth Circuit, like many other circuits has expressly held citizen-voting-age population is the proper metric to determine potential minority voting strength.3 Specifically, the court has held that citizen-voting-age population is the appropriate population for measuring Section 2 compliance because (1) the plain language of Section 2 “makes clear that its protections apply to United States citizens” and (2) the purpose of Section 2 is “to facilitate participation by minorities in our political process, by preventing dilution of their

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3 Campos v. City of Houston, 113 F.3d 544 (5th Cir. 1997). See also Reyes v. City of Farmers Branch, 586 F.3d 1019, 1023–24 (5th Cir. 2009).
votes.”4 Other measures, such as voting-age population, may substantially overestimate minority voting strength if the minority group in question includes a significant number of non-citizens.5 The United States Supreme Court has therefore recognized that reliance on citizen-voting-age population “fits the language of § 2 because only eligible voters affect a group’s opportunity to elect candidates.”6

Much has been made about whether including a question regarding citizenship will reduce the number of responses to the census questionnaire. But facts are stubborn things, and past experience provides no reason to believe that a question about citizenship will discourage participation.7 A question concerning citizenship appeared in each Census questionnaire from 1970–2000. Every census since 1970 has shown the total population in the United States has increased—at an average rate of almost 11.5%.8 When the question concerning citizenship was removed from the 2010 Census, one might expect that the total reporting population might increase dramatically. Yet the 2010 Census revealed that percentage increase in the total population was actually the lowest percentage increase since at least 1960.9 Plus, since the question concerning citizenship has been used in the American Community Surveys (“ACS”), the five-year rolling Demographic and Housing Estimates continue to show consistent annual percentage growth that can be projected to match the same rate of growth reported in the 2010 Census.10 Taken together, these figures refute any argument that including a question concerning citizenship on the 2020 Census will undermine its effectiveness.11

It has also been suggested that it is too late to add a question concerning citizenship to the 2020 Census, mainly because the question has not been tested. On the contrary, such a question was tested for the thirty-year period between 1970–2000, and it continues to be tested in the ACS surveys.

It is unfortunate that a few misguided individuals are attempting to politicize an apolitical issue by creating a sense of fear and distrust without any supporting evidence.

It is my hope that the Bureau sees through the fog of misinformation and includes a question concerning citizenship on the 2020 Census. Obtaining this essential information from the best available source will significantly assist the States in their effort to carry out their constitutional duty to reapportion legislative districts while complying with the Voting Rights Act.

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4 Campos, 113 F.3d, at 548.
5 See id.
6 LULAC v. Perry, 548 U.S. at 429.
7 “Facts are stubborn things; and whatever may be our wishes, our inclinations, or the dictates of our passion, they cannot alter the state of facts and evidence.” John Adams (1735–1826), Argument in defense of the soldiers of the Boston Massacre Trials, December 1770.
9 Id.
11 In addition, information obtained by the Census Bureau is confidential and may not be shared, except in limited circumstances. See 13 U.S.C. § 9 (West 1997).
For these reasons, I request that the Census Bureau include a question regarding citizenship on the 2020 Census questionnaire.

Sincerely,

Jeffrey C. Mafeer
First Assistant Attorney General
March 15, 2018

Mr. Jeffrey C. Mateer
First Assistant Attorney General
Office of the Attorney General
PO Box 12548
Austin, TX 78711-2548

Dear Mr. Mateer:

Thank you for your recent inquiry regarding the U.S. Department of Justice’s (DOJ) request to add a citizenship question to the 2020 Census questionnaire. We appreciate your taking the time to make me aware of your position on this important matter.

The U.S. Department of Commerce (DOC) is conducting an orderly review of the DOJ’s request. The DOC is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a complete and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority.

We will keep you apprised of any developments regarding the citizenship question. If you have any additional questions or would like to discuss this matter further, please contact our Office of Congressional and Intergovernmental Affairs at 301-763-6100.

Sincerely,

Ron S. Jarmin
Performing the Non-Exclusive Functions
and Duties of the Director
February 23, 2018

Honorable Wilbur Ross  
Secretary of Commerce  
U.S. Department of Commerce  
1401 Constitution Ave. NW  
Washington, DC 20230

Dear Secretary Ross:

I am writing to express my strongest support for the Justice Department’s request to add a citizenship question to the decennial census of 2020.

Accurate census information is critical in determining the designation of political district boundaries for House of Representative seats in each state. Having the ability to delineate this demographic from eligible voters is essential in forming this determination. The census data is the sole mechanism in making the assessment.

As you know, a citizenship component was part of the census data from 1970 through 2000. It was not until 2010 that this data was excluded from the “long form” questionnaire. The data was replaced by the American Community Survey which relies not upon actual responses to the survey, but is predicated on other data sets which do not conform temporally or statistically with actual responses from the voting-age citizen population.

I am strongly committed to working with your office to produce the most accurate representation of voting-age citizens in West Virginia.

Respectfully submitted,

Mac Warner  
WEST VIRGINIA  
SECRETARY OF STATE
March 23, 2018

The Honorable Mac Warner  
Secretary of State  
of the State of West Virginia  
State Capitol  
Charleston, WV 25305

Dear Mr. Warner:

Thank you for your recent letter regarding your support of the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a complete and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I have conducted a rigorous review and produced a new 2020 Census lifecycle cost estimate, and I have put into place the people, processes, and programs necessary to ensure strong governance and oversight of the 2020 Census.

If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross

Wilbur Ross
February 23, 2018

The Honorable Wilbur Ross
Secretary of Commerce
United States Department of Commerce
1401 Constitution Avenue NW
Washington, D.C. 20233-0001

Dear Secretary Ross,

As the Chief Legal Officer of the State of Alabama, I respectfully request that the Department of Commerce collect full and accurate citizenship data during the 2020 census.

State and local governments use census data in redistricting after the decennial census. This data allows state and local governments to draw accurate district lines that equalize population, consolidate communities of interest, and comply with the Voting Rights Act and United States Constitution. Citizenship data is especially important in redistricting because, along with voting-age information, citizenship data allows state and local bodies to identify the total potential voting population in any given district.

As you know, the Census Bureau has historically included a citizenship question on the “long form” questionnaire sent to households during each decennial census. But, in 2000, the Bureau replaced the long form with the American Community Survey (“ACS”), which reaches far fewer people. The ACS is currently the only program that collects citizenship data for the Bureau.

The ACS does not provide citizenship data at the level of detail the States and localities need. The ACS is a rolling survey that does not necessarily correspond to the total population data provided by the decennial census. ACS data is not reported at the census block level which, along with voting precincts, are the basic building blocks of districts. And, perhaps most important for state and local governments, the ACS’s margin of error increases as the geographic area decreases. Many State and local districts are quite small, especially at the municipal and county level. The ACS’s sliding margin of error makes it an ineffective tool to understand the citizen population of small districts in less populated rural areas.
For these reasons, I believe the Department should reinstate a question regarding citizenship into the 2020 census.

Sincerely,

Steve Marshall
Attorney General
March 23, 2018

The Honorable Steven T. Marshall
Attorney General of the State of Alabama
501 Washington Avenue
Montgomery, AL 36130

Dear Mr. Marshall:

Thank you for your recent letter regarding your support of the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a complete and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I have conducted a rigorous review and produced a new 2020 Census lifecycle cost estimate, and I have put into place the people, processes, and programs necessary to ensure strong governance and oversight of the 2020 Census.

If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross
The Honorable Wilbur L. Ross Jr.
Secretary of Commerce
United States Department of Commerce

Dear Secretary Ross,

Section 2 of the Voting Rights Act provides, among other things, that “No voting qualification or prerequisite to voting or standard, practice, or procedure shall be imposed or applied by any State or political subdivision in a manner which results in a denial or abridgement of the right of any citizen of the United States to vote on account of race or color.”

In order to best enforce this prohibition, an accurate enumeration of the number of citizens in America should be conducted, and the most accurate such enumeration would be one in which a question regarding citizenship were reinstated starting with the 2020 Census.

I am writing to formally request that the Census Bureau reinstate a question regarding citizenship starting in the 2020 Census. Thank you for considering this request.

Sincerely,

Bob Goodlatte
Chairman
March 23, 2018

The Honorable Bob Goodlatte
U.S. House of Representatives
Washington, DC 20515

Dear Representative Goodlatte:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a complete and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I have conducted a rigorous review and produced a new 2020 Census lifecycle cost estimate, and I have put into place the people, processes, and programs necessary to ensure strong governance and oversight of the 2020 Census.

We will keep you apprised of any developments regarding the citizenship question. If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross
February 27, 2018

Dr. Ron Jarmin  
U.S. Census Bureau  
United States Department of Commerce  
Washington, DC 20233-001

Re: Planned Development and Submission of Questions Planned for the 2020 Census

Dear Dr. Jarmin:

We write on behalf of the County of Santa Clara (the “County”) regarding whether and how the U.S. Census Bureau intends to consider public comment on proposed changes to the 2020 Census questionnaire.

The County has reviewed the Census Bureau’s April 29, 2016 2020 Census Program Memorandum No. 2016.05 entitled “Planned Development and Submission of Subjects Planned for the 2020 Census Program and Questions Planned for the 2020 Census Program” (the “Development Memo”), which “officially documents the U.S. Census Bureau’s plan to develop and transmit to Congress the Subjects Planned for the 2020 Census Program and Questions Planned for the 2020 Census Program.” (We have attached the memorandum to this letter.)

The Development Memo sets out a timeline for development of subjects and questions to be included in the 2020 census, as well as planned public comment periods. In particular, the memorandum indicates that the Bureau intends to conduct two public comment periods on proposed changes to the questions included on the 2020 Census questionnaire. The Development Memo indicates that public comment would be sought between May 2018 – July 2018 and August 2018 – September 2018.

Given the importance of the 2020 Census and proposed changes to the 2020 Census questionnaire, the County wishes to confirm as soon as possible that it will have the opportunity
Letter to Dr. Ron Jarmin, U.S. Census Bureau  
Re: Planned Development and Submission of Questions Planned for the 2020 Census  
February 27, 2018  
Page 2 of 2

to comment on any proposed changes. Please indicate at your earliest opportunity whether the Bureau intends to consider public comment on 2020 Census questionnaire changes as set out in the Development Memo, or whether the Bureau intends to alter or abandon this plan.

Very truly yours,

JAMES R. WILLIAMS  
County Counsel

DANIELLE L. GOLDSTEIN  
Deputy County Counsel

Attachment: U.S. Census Bureau’s April 29, 2016 2020 Census Program Memorandum No. 2016.05, entitled “Planned Development and Submission of Subjects Planned for the 2020 Census Program and Questions Planned for the 2020 Census Program”
2020 CENSUS PROGRAM MEMORANDUM SERIES: 2016.05

Date: April 29, 2016

MEMORANDUM FOR: The Record

From: Lisa M. Blumerman (signed April 29, 2016)
Associate Director, Decennial Census Programs

Subject: Planned Development and Submission of Subjects Planned for the 2020 Census Program and Questions Planned for the 2020 Census Program

Contact: Marisa Hotchkiss
Decennial Communications Coordination Office
301-763-2891
Marisa.Tegler.Hotchkiss@census.gov

This memorandum officially documents the U.S. Census Bureau’s plan to develop and transmit to Congress the Subjects Planned for the 2020 Census Program and Questions Planned for the 2020 Census Program.

Overview
Title 13, U.S. Code requires the Census Bureau to send Congress the subjects proposed to be included in the census not later than three years before the Census date. Congress will receive the Subjects Planned for the 2020 Census Program, describing the subjects proposed for the 2020 Census and the American Community Survey (ACS) before March 31, 2017.

Title 13 also requires that Congress receive the specific questions proposed to be included in the census not later than two years before the Census date. Congress will receive the Questions Planned for the 2020 Census Program, introducing the questions proposed for the 2020 Census and the ACS before March 31, 2018.

The Census Bureau will submit the topics included on the 2020 Census and ACS jointly, as ACS will incorporate 2020 Census content beginning in 2019, and the Census of Island Areas will incorporate a selection of these subjects and questions as well. As preparations begin for the 2020 Census, the content of both operations is jointly considered and finalized.

Scope
Previous submissions of the documentation regarding subjects and questions included the following information, examples of which can be seen in Appendices A and B:
Subjects Planned Documentation
- A brief summary of the data created by each question collected;
- An explanation of how the data are currently used to meet federal needs;
- A selection of non-federal community uses of the data; and
- Selected statutory uses by agency.

Questions Planned Documentation
- An image of the paper (mailed) version of each question;
- A brief summary of the data created by each question collected;
- An explanation of how the data are currently used to meet federal needs; and
- A selection of non-federal community uses of the data:

The documentation submitted in 2017 and 2018 will include the same complement of information. Additionally, although the ACS and 2020 questions differ by response mode, the version highlighted in the question documentation will continue to be the version included on the paper questionnaire.

Project Timeline
Many stakeholders share an interest in the 2020 Census and ACS content, including federal agencies, federal statistical agencies, state and local governments, those who will respond to the 2020 Census and ACS, academia, businesses, nonprofit organizations, media, data users, and oversight groups. The Census Bureau will develop this documentation through a process that is clear and transparent to all stakeholders, and offer opportunities for input to be provided and considered throughout the process.

The table below contains a timeline for this document development, as well as opportunities for stakeholders to comment on proposed content.¹

<table>
<thead>
<tr>
<th>Phase</th>
<th>Planned Activity</th>
<th>Planned Activity Timeline</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Inform/Create General Awareness</td>
<td>March 2016—August 2016</td>
</tr>
<tr>
<td>2</td>
<td>Federal Agencies are Invited to Provide Updates to Federal Use Documentation</td>
<td>March 2016—June 2016</td>
</tr>
<tr>
<td>3</td>
<td>Incorporate Feedback</td>
<td>May 2016—September 2016</td>
</tr>
<tr>
<td>4</td>
<td>Develop Topic Submission</td>
<td>October 2016—December 2016</td>
</tr>
<tr>
<td>5</td>
<td>Provide Updates and Conduct Briefings</td>
<td>January 2017—March 2017</td>
</tr>
<tr>
<td>6</td>
<td>Final <em>Topics Planned</em> document available</td>
<td>No later than March 31, 2017</td>
</tr>
<tr>
<td>7</td>
<td>Follow-up with Federal Agencies about Federal Use Documentation <em>as needed</em></td>
<td>March 2017—June 2017</td>
</tr>
<tr>
<td>8</td>
<td><em>Federal Register</em> notice of Public Comment</td>
<td>July 2017—September 2017</td>
</tr>
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</table>

¹ These dates are intended to show the planned phases in the development of this documentation, though actual dates may be subject to change.
<table>
<thead>
<tr>
<th>Phase</th>
<th>Planned Activity</th>
<th>Planned Activity Timeline</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Period (proposed changes to ACS)</td>
<td>(60 days)</td>
</tr>
<tr>
<td>9</td>
<td>Federal Register notice of Public Comment Period II (ACS submission)</td>
<td>December 2017—January 2018 (30 days)</td>
</tr>
<tr>
<td>10</td>
<td>Submit Information Collection Request (ICR) to OMB under the Paperwork Reduction Act (proposed changes to ACS)</td>
<td>January 2018</td>
</tr>
<tr>
<td>11</td>
<td>Federal Register notice Public Comment Period (proposed content for 2020 Census)</td>
<td>May 2018—July 2018 (60 days)</td>
</tr>
<tr>
<td>12</td>
<td>Federal Register notice Public Comment Period II (2020 Census submission)</td>
<td>August 2018—September 2018 (30 days)</td>
</tr>
<tr>
<td>13</td>
<td>Submit Information Collection Request (ICR) to OMB under the Paperwork Reduction Act (proposed content for 2020 Census)</td>
<td>September 2018</td>
</tr>
<tr>
<td>14</td>
<td>Provide Updates and Conduct Briefings</td>
<td>January 2018—March 2018</td>
</tr>
<tr>
<td>15</td>
<td>Final Questions Planned document available</td>
<td>No later than March 31, 2018</td>
</tr>
</tbody>
</table>

**Federal Agency Input**

The Census Bureau intends to begin developing draft descriptions of each topic and question based on recent information about the federal requirements and uses of Census estimates. The current uses received from federal agency contacts as part of the 2014 ACS Content Review, as well as informational materials (FAQs, current question versions\(^2\), etc.) are posted with this memorandum at [http://www.census.gov/programs-surveys/decennial-census/2020-census/planning-management/memo-series.html](http://www.census.gov/programs-surveys/decennial-census/2020-census/planning-management/memo-series.html). Federal agencies with known uses of the 2020 Census or ACS content, and select other agencies, will receive a letter with instructions for how federal data users may provide updates to the documentation of data uses. Responses should be received before July 1, 2016. Census Bureau staff may follow-up with federal users directly if more clarification is required.

Members of the White House Office of Management and Budget (OMB) Interagency Committee on the ACS and Interagency Committee on Statistical Policy Subcommittee on the ACS will be notified about this effort and encouraged to collaborate within their agencies on confirming existing uses, or submitting corrections and additions.

Though this initial effort will take place in 2016, additional follow-up may be needed in 2017 if changes to the content warrant another check-in with agencies.

Additionally, all interested stakeholders will be able to comment on the *Federal Register* notices related to proposed changes in the content.

\(^2\) Federal agency contacts should be aware that the topics and questions provided reflect past topics and questions (i.e., the topics and questions may change between the information gathering process and the final submission of the content).
Content Determination

This process assumes that there will be changes to the ACS content and that the 2020 Census content may also feature new or different questions. The development of this content, including proposals for new questions, will continue to follow the normal content development process (outside the scope of the development of the subjects and questions submission). However, it is important to note that these processes offer opportunities for all stakeholders to comment on the proposed subjects and questions.

In general, proposed changes to questions, proposed by federal agencies through OMB, must demonstrate a clear need for data at the geographic levels provided by the 2020 Census or ACS. OMB, the Census Bureau, and interagency committees (with federal agency representation) consider these proposals, conduct qualitative research and testing, and evaluate the resulting estimates. Final proposed questions are based on the results of extensive cognitive testing, field testing, other ongoing research, and input from advisory committees.

To comply with the Paperwork Reduction Act (PRA) and its implementing regulations, the Census Bureau must submit an Information Collection Request (ICR) to OMB. This set of documents describes the information needed, why it is needed, how it will be collected, and how much collecting the information will cost the respondents and the government.

Before an ICR is submitted, the Census Bureau will publish a Federal Register notice informing the public of an intent to ask for clearance for the collection of information and soliciting comments for a 60 day period. Census Bureau staff then respond to comments received, and make necessary revisions.

When the final ICR is prepared, a second Federal Register notice is published. This second opportunity for public comment notifies the public that the clearance request has been submitted to OMB and they have an opportunity to comment. OMB reviews the ICR and public comments over a 60-day period, and determines whether or not to authorize the change.

ICRs for the 2020 Census and ACS are planned for 2018. The ACS submission will include a plan to incorporate questions developed for the 2020 Census along with changes recommended by the 2016 ACS Content Test. Stakeholders will have an opportunity to comment on these potential changes during the Federal Register notice comment periods.

If the ICRs are finalized before the March 31, 2018 submission to Congress, the Questions Planned for the 2020 Census will reflect only content that has been approved by OMB. Alternatively, content that has not been authorized by OMB will be noted as "proposed" in the submission.

Final Product

The final Subjects for the 2020 Census Program and Questions for the 2020 Census Program documents will be printed and submitted to Congress. Additional .pdf versions of these documents and supporting materials will concurrently be made available on the census.gov website.
The 2020 Census Memorandum Series

The 2020 Census Memorandum Series documents significant decisions, actions, and accomplishments of the 2020 Census Program for the purpose of informing stakeholders, coordinating interdivisional efforts, and documenting important historical changes.

A memorandum generally will be added to this series for any decision that meets the following criteria:

1. A major program-level decision that will affect the overall design or have a significant effect on the 2020 Census operations or systems.

2. A major policy decision or change that will affect the overall design or significantly impact the 2020 Census operations or systems.

Visit 2020 Census on census.gov to access the Memorandum Series, the 2020 Operational Plan, and other information about preparations for the 2020 Census.
Appendix A: Subjects Planned for the 2010 Census and American Community Survey
Federal Legislative and Program Uses (Age)

MEETING FEDERAL NEEDS

Age is central for any number of federal programs that target funds or services to children, working-age adults, women of childbearing age, or the older population. The Department of Education uses census age data in its formula for allotment to states. Under the Voting Rights Act, the data on population of voting age are required for legislative redistricting. The Department of Veterans Affairs uses age to develop its mandated state projections on the need for hospitals, nursing homes, cemeteries, domiciliary services, and other benefits for veterans.

COMMUNITY BENEFITS

Education
Counts and school districts are allotted funds based on age data. These funds provide resources and services to improve the education of economically disadvantaged children and children with disabilities.

Locations where new schools are needed, as well as the required grade levels (elementary, middle, or high school) are identified using data about age.

Government
Data presenting the voting-age population are used by states to meet legislative redistricting requirements.

Planners at all levels of government forecast the need for highways, hospitals, health services, and retirement homes by using age data.

Employment
Data about age are used to target veterans for job training programs.

Equal employment opportunities are enforced using data about age.

Social Services
Age data are used to forecast the number of people eligible for Social Security and Medicare benefits.

Under the Older Americans Act, age data are part of the formula used to allocate funds for services to seniors with low incomes.
SELECTED STATUTORY USES

EDUCATION
Individuals With Disabilities Education Act
[20 U.S.C. 1411(e), Chapter 33, Subchapter II],
Vocational and Technical Education Assistance to the States
[20 U.S.C. 2321(a)(2)(A), (B), & (C) and 2372(a)],
School-to-Work Opportunities Act
[20 U.S.C. 6145 & 6177, Chapter 69, Subchapter II-Part B and Subchapter III]

EEOC
Age Discrimination and Employment Act
[29 U.S.C. 623 & 633; 29 CFR 1625.7(c)]

HHS
Older Americans Act
[42 U.S.C. 3002(28)-(30), 3025(a)(1)(E) & (2)(E), and 3026(a)(1)],
Public Health Service Act
[42 U.S.C. 254(a)(3)(A) & (B), 254e(b) & (d) & 254f-1],
Low-Income Home Energy Assistance Program (LIHEAP)
[42 U.S.C. 8629(a) & (b)(2), and 8622(11)]

HUD
Community Development Block Grant (CDBG) Program
[42 U.S.C. 5302(a)(6)(D)(iv)]

JUSTICE
Voting Rights Act-Bilingual Election Requirements
[42 U.S.C. 1973aa-1a; 28 CFR Part 55],
Civil Rights Act (Unlawful Employment Practices)

LABOR
Workforce Investment Act of 1998
[P.L. 105-220, Sec. 182(a)]

VA
State Projections of Veteran Population
[38 U.S.C. 8131(1) & 8134(e)(2)],
Veterans Benefits Improvement Act
[38 U.S.C. 317 & 318, Chapter 3],
Disabled Veterans Outreach Program
[38 U.S.C. 4103A(a)(1), Chapter 41]

Note: These statutory uses were last confirmed in 2002. Work is underway with other Federal agencies to
develop a comprehensive list of the most current statutory uses supporting each 2010 Census and American
Community Survey question. An updated list will be included in the March 2008 submission of Questions
Planned for the 2010 Census and American Community Survey.

Appendix B: Questions Planned for the 2010 Census and American Community Survey
MEETING FEDERAL NEEDS

Age is central for any number of federal programs that target funds or services to children, working-age adults, women of childbearing age, or the older population. The Department of Education uses census age data in its formula for allotment to states. Under the Voting Rights Act, the data on population of voting age are required for legislative redistricting. The U.S. Department of Veterans Affairs uses age to develop its mandated state projections on the need for hospitals, nursing homes, cemeteries, domiciliary services, and other benefits for veterans.

COMMUNITY BENEFITS

Education
 Counties and school districts are allotted funds based on age data. These funds provide resources and services to improve the education of economically disadvantaged children and children with disabilities. Locations where new schools are needed, as well as the required grade levels (elementary, middle, or high school), are identified using data about age.

Government
 Data presenting the voting-age population are used by states to meet legislative redistricting requirements. Planners at all levels of government forecast the need for highways, hospitals, health services, and retirement homes by using age data.

Employment
 Data about age are used to target veterans for job training programs. Equal employment opportunities are enforced using data about age.

Social Services
 Age data are used to forecast the number of people eligible for Social Security and Medicare benefits. Under the Older Americans Act, age data are part of the formula used to allocate funds for services to seniors with low incomes.
FEB 27 2018

The Honorable Barbara Comstock
Member, U.S. House of Representatives
21430 Cedar Drive, Suite 218
Sterling, VA 20164

Dear Representative Comstock:

Thank you for your staff’s February 6, 2018 inquiry on behalf of your constituent, Mr. Todd Cimino-Johnson, regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. We contacted Mr. Cimino-Johnson and addressed his concerns.

The U.S. Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a full, fair, and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority.

Thank you for bringing this matter to our attention. If you have any additional questions or would like to discuss this matter further, please contact our Office of Congressional and Intergovernmental Affairs at 301-763-6100.

Sincerely,

Ron S. Jarmin
Performing the Non-Exclusive Functions
and Duties of the Director

United States Census Bureau
FEB 27 2018

Mr. Todd Cimino-Johnson
775 Gateway Drive, SE
Leesburg, VA 20175

Dear Mr. Cimino-Johnson:

Thank you for your recent inquiry to Representative Barbara Comstock regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. We appreciate your taking the time to make me aware of your position on this important matter.

The U.S. Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a full, fair, and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority.

We will keep you apprised of any developments regarding the citizenship question. If you have any additional questions or would like to discuss this matter further, please contact our Office of Congressional and Intergovernmental Affairs at 301-763-6100.

Sincerely,

Ron S. Jarmin
Performing the Non-Exclusive Functions and Duties of the Director
February 27, 2018

VIA ELECTRONIC SUBMISSION

The Honorable Wilbur Ross
Secretary
U.S. Department of Commerce
Washington, D.C. 20230

Dear Secretary Ross:

We are writing to request that you instruct the Census Bureau to add a question regarding citizenship to the 2020 decennial census. It’s essential that we have an accurate assessment of our population in order to administer laws such as the Voting Rights Act, and the 10 year census provides the most precise assessment available.

As you know, the Census Bureau already collects citizenship information in the annual American Community Survey (ACS), which is a rolling census introduced in 2005 to collect the same information previously gathered by the “long-form” census. It goes out to 3.5 million households every year and according to your organization it is “the premier source for detailed population and housing information about our nation.”

Nonetheless, some are upset about the Department of Justice’s request to add a citizenship question to the census. They claim that it will deter immigrants from answering honestly and will jeopardize the accuracy of the results. We have never heard such criticism about the ACS questions on citizenship.

Your website makes it clear that individual responses on the ACS can't be shared with anyone: “not the IRS, not the FBI, not the CIA, and not with any other government agency.” You also make it clear that the larger body of census data is protected, and that “[v]iolating the confidentiality of a [census] respondent is a federal crime with serious penalties, including a federal prison sentence of up to five years, a fine of up to $250,000, or both.”

To date, these

2 See, e.g., “Voting Age by Population and Race” https://www.census.gov/rdi/data/voting_age_population_by_citizenship_and_race_cvap.html
4 See “American Community Survey (ACS)” https://www.census.gov/programs-surveys/acs/
5 See, e.g., Ltr from Congresspersons Serrano and Meng to Sec’y Ross (undated) https://www.documentcloud.org/documents/4343863-FINAL-Census-Letter-to-Secretary-Wilbur-Ross.html
6 ACS, “Why We Ask Questions About . . . Place of Birth, Citizenship, Year of Entry” https://www.census.gov/acs/www/about/why-we-ask-each-question/citizenship/
assurances appear to have satisfied ACS respondents; there is no evidence that asking about citizenship reduces responses or otherwise limits the utility of that particular survey. We have yet to see any credible evidence that immigrants wouldn’t be equally comforted by the stronger assurances regarding responses provided for the 10 year census.

The most important difference between the ACS and the decennial census is the size of the population studied. The decennial census is both larger (in that it counts every resident in the United States) and more precise (in that it calculates results down to the size of individual census blocks). The much smaller ACS samples approximately one tenth of the U.S. population, it calculates results only down to the census block group level, and of course, any statistical model based solely on a sample of the overall population is subject to the inevitable “sampling error.” In short, the decennial census provides the most true and accurate picture of our overall population, and its relevant characteristics.

The Department of Justice has indicated that it requires the more precise and granular data provided by the decennial census in order to best administer the Voting Rights Act. That enforcement is within their purview, and we see no reason not to defer to their analysis in this case. We hope that we will see a question regarding citizenship when you report your final census to Congress on March 31, 2018.

Sincerely,

Tom Cotton
United States Senator

Ted Cruz
United States Senator

James M. Inhofe
United States Senator

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8 See generally U.S. Census Bureau, “What We Do” https://www.census.gov/about/what.html.
March 19, 2018

The Honorable Tom Cotton
United States Senate
Washington, DC 20510

Dear Senator Cotton:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a complete and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I have conducted a rigorous review and produced a new 2020 Census lifecycle cost estimate, and I have put into place the people, processes, and programs necessary to ensure strong governance and oversight of the 2020 Census.

We will keep you apprised of any developments regarding the citizenship question. If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross

Wilbur Ross
March 19, 2018

The Honorable Ted Cruz  
United States Senate  
Washington, DC 20510

Dear Senator Cruz:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a complete and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I have conducted a rigorous review and produced a new 2020 Census lifecycle cost estimate, and I have put into place the people, processes, and programs necessary to ensure strong governance and oversight of the 2020 Census.

We will keep you apprised of any developments regarding the citizenship question. If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross

Wilbur Ross
March 19, 2018

The Honorable James M. Inhofe
United States Senate
Washington, DC 20510

Dear Senator Inhofe:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a complete and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I have conducted a rigorous review and produced a new 2020 Census lifecycle cost estimate, and I have put into place the people, processes, and programs necessary to ensure strong governance and oversight of the 2020 Census.

We will keep you apprised of any developments regarding the citizenship question. If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross

Wilbur Ross
February 27, 2018

Barbara A. Anderson, Ph.D.
Chair, Census Scientific Advisory Committee
Ronald A. Freedman Collegiate Professor
   of Sociology and Population Studies
University of Michigan
500 South State Street
Ann Arbor, MI 48109-1382

Dear Dr. Anderson:

   Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

   The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

   Let me underscore my commitment to conduct a full, fair, and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I reported back to Congress last October after I conducted a rigorous deep dive to produce a new 2020 Census lifecycle cost estimate as well as a thorough review of Census programming and financial management. I have assembled a multidisciplinary team to address and remedy concerns expressed by the Government Accountability Office, the Department of Commerce’s Office of the Inspector General, the Office of Management and Budget, and Congressional members. In addition, I have put into place the people, processes, and programs to ensure strong governance and oversight of the 2020 Census.

   If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663. Thank you again for your letter. We appreciate your thoughtful input.

Sincerely,

Wilbur Ross

Wilbur Ross
February 27, 2018

Barbara Buttenfield, Ph.D.
Professor of Geography
University of Colorado
GUGG 110, 260 UCB
Boulder, CO 80309-0260

Dear Dr. Buttenfield:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a full, fair, and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I reported back to Congress last October after I conducted a rigorous deep dive to produce a new 2020 Census lifecycle cost estimate as well as a thorough review of Census programming and financial management. I have assembled a multidisciplinary team to address and remedy concerns expressed by the Government Accountability Office, the Department of Commerce’s Office of the Inspector General, the Office of Management and Budget, and Congressional members. In addition, I have put into place the people, processes, and programs to ensure strong governance and oversight of the 2020 Census.

If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663. Thank you again for your letter. We appreciate your thoughtful input.

Sincerely,

Wilbur Ross

Wilbur Ross
February 27, 2018

Peter W. Glynn, Ph.D.
Thomas W. Ford Professor of Engineering
Stanford University
Huang Engineering Center 359A
Stanford, CA 94305

Dear Dr. Glynn:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663. Thank you again for your letter. We appreciate your thoughtful input.

Sincerely,

Wilbur Ross

Wilbur Ross
February 27, 2018

D. Sunshine Hillygus, Ph.D.
Professor of Political Science
Director, Duke Initiative on Survey Methodology
Duke University
203 Gross Hall – Box 90204
Durham, NC 27708

Dear Dr. Hillygus:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663. Thank you again for your letter. We appreciate your thoughtful input.

Sincerely,

Wilbur Ross

Wilbur Ross
February 27, 2018

Juan Pablo Hourcade, Ph.D.
Associate Professor of Computer Science
University of Iowa
14 MacLean Hall
Iowa City, IA 52242

Dear Dr. Hourcade:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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Sincerely,

Wilbur Ross
February 27, 2018

Ms. Kathryn Pettit  
Senior Research Associate  
Metropolitan Housing and Communities Policy Center  
The Urban Institute  
2100 M Street, NW  
Washington, DC 20037

Dear Ms. Pettit:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663. Thank you again for your letter. We appreciate your thoughtful input.

Sincerely,

Wilbur Ross
February 27, 2018

Allison Plyer, ScD
Chief Demographer
The Data Center at Nonprofit Knowledge Works
1600 Constance Street
New Orleans, LA 70130

Dear Dr. Plyer:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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Sincerely,

Wilbur Ross

Wilbur Ross
February 27, 2018

Roberto Rigobon, Ph.D.
Society of Sloan Fellows Professor of Applied Economics
MIT Sloan School of Management
100 Main Street, Building E62, Room E62-515
Cambridge, MA 02139

Dear Dr. Rigobon:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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Sincerely,

Wilbur Ross

Wilbur Ross
February 27, 2018

Andrew Samwick, Ph.D.
Professor of Economics
Director, The Nelson A. Rockefeller Center
Dartmouth College
6082 Rockefeller Hall
Hanover, NH 03755

Dear Dr. Samwick:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

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If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663. Thank you again for your letter. We appreciate your thoughtful input.

Sincerely,

Wilbur Ross

Wilbur Ross
February 27, 2018

Mr. Kenneth D. Simonson  
Chief Economist  
The Associated General Contractors of America  
2300 Wilson Boulevard, Suite 300  
Arlington, VA 22201

Dear Mr. Simonson:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a full, fair, and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I reported back to Congress last October after I conducted a rigorous deep dive to produce a new 2020 Census lifecycle cost estimate as well as a thorough review of Census programming and financial management. I have assembled a multidisciplinary team to address and remedy concerns expressed by the Government Accountability Office, the Department of Commerce’s Office of the Inspector General, the Office of Management and Budget, and Congressional members. In addition, I have put into place the people, processes, and programs to ensure strong governance and oversight of the 2020 Census.

If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663. Thank you again for your letter. We appreciate your thoughtful input.

Sincerely,

Wilbur Ross

[Signature]
February 28, 2018

The Honorable Jon Tester  
United States Senate  
Washington, DC  20510  

Dear Senator Tester:

Thank you for your staff’s recent inquiry regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. We appreciate your taking the time to make me aware of your position on this important matter.

The U.S. Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a complete and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority.

We will keep you apprised of any developments regarding the citizenship question. If you have any additional questions or would like to discuss this matter further, please contact our Office of Congressional and Intergovernmental Affairs at 301-763-6100.

Sincerely,

[Signature]

Ron S. Jarmin  
Performing the Non-Exclusive Functions  
and Duties of the Director
As part of his decision-making process, Secretary Ross spoke to a number of different stakeholders about the Department of Justice’s request to reinstate the citizenship question on the 2020 Decennial. These notes attempt to memorialize those conversations. These are not verbatim transcripts and each summary reflects the recollections of attendees from the Department of Commerce. Every effort has been made to ensure these notes are an accurate reflection of Secretary Ross’s conversations with stakeholders.

Senator Brian Schatz (D. HI)

On February 28, 2018, Secretary Ross and members of his staff spoke to Senator Brian Schatz of Hawaii. Secretary Ross thanked Senator Schatz for helping confirm Assistant Secretary Jacobs and noted the importance of a continued positive relationship between NOAA and the State of Hawaii.

Senator Schatz stated that he was concerned about the potential addition of a citizenship question to the 2020 Decennial Census primarily on the ground that the question had never been asked before. Secretary Ross explained the process through which the potential addition of a new question was considered and reassured the Senator that process was underway. Secretary Ross also corrected the Senator’s misperception about the question’s novelty, noting that variations of the question were included on the Decennial Census from 1820 through 1950, and that citizenship questions were also included on the American Community Survey.

Secretary Ross asked the Senator whether he had any concerns that were unique to the State of Hawaii, and Senator Schatz responded that he did not. Senator Schatz thanked the Secretary for his time and careful consideration of the question, and the call concluded.

- The question has never been asked
March 6, 2018

The Honorable Wilbur Ross  
Secretary of Commerce  
U.S. Department of Commerce  
1401 Constitution Avenue NW  
Washington, DC 20230

Dear Secretary Ross:

I am chair of the New York City Voter Assistance Advisory Committee (VAAC), an arm of the New York City Campaign Finance Board, an independent agency of the City of New York. I write on behalf of the VAAC to oppose the recent request by the Department of Justice to add a question on citizenship to the questionnaire for the 2020 Census. The VAAC is mandated by the New York City Charter to encourage and facilitate voter registration and voting by all residents of New York City. Specifically, we are required by the Charter to identify groups who are underrepresented among those who are registered and voting, and to work to increase participation by these residents in the democratic process.

With planning for the 2020 Census nearly complete, no question regarding citizenship has been tested or made available for public review. We are concerned that asking respondents to report their citizenship status will significantly depress participation by these underrepresented groups in the Census, resulting in a population undercount. The undercount will disproportionately harm underrepresented groups, their neighborhoods, and our entire city. It will threaten the representation in Congress of communities that are already underrepresented and who we are mandated to serve. The Census Bureau is obligated under the Constitution to determine “the whole number of persons in each state.” This predictable, preventable undercount will represent a failure to discharge the Bureau’s Constitutional mandate.

In addition, the Justice Department’s request for this data as necessary to ensure compliance with Section 2 of the Voting Rights Act is not accurate. The Voting Rights Act was enacted to protect fair and effective representation for all communities, and collecting citizenship information will actually undermine this goal. Communities that are undercounted will be deprived of their fair representation when legislative seats are apportioned and district lines drawn.
Fair, accurate electoral representation depends on valid Census data. Adding a citizenship question would defeat that goal, violate the Constitution, and undermine the purposes of the Voting Rights Act. We urge you to reject the Justice Department's request.

Sincerely,

[Signature]

Naomi B. Zauderer
Chair

Cc: Committee Members
March 23, 2018

Ms. Naomi B. Zauderer
Voter Assistance Advisory Committee
NYC Votes
100 Church Street, 12th Floor
New York, NY 1007

Dear Ms. Zauderer:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate you taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a complete and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I have conducted a rigorous review and produced a new 2020 Census lifecycle cost estimate, and I now have in place the people, processes, and programs to ensure strong governance and oversight of the 2020 Census.

If you have any additional questions or would like to discuss this matter further, please contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross
As part of his decision-making process, Secretary Ross spoke to a number of different stakeholders about the Department of Justice’s request to reinstate the citizenship question on the 2020 Decennial. These notes attempt to memorialize those conversations. These are not verbatim transcripts and each summary reflects the recollections of attendees from the Department of Commerce. Every effort has been made to ensure these notes are an accurate reflection of Secretary Ross’s conversations with stakeholders.

Senator Tom Carper (D, DE)

On March 12, 2018, Secretary Ross and members of his staff spoke to Senator Carper and two members of his staff – Brian Papp and Richard Colley. The Senator thanked Secretary Ross for the opportunity to discuss DOJ’s request to reinstate a citizenship question on the Decennial Census.

The Senator noted that as a Senator from a single district state, he does not share concerns about redistricting that members of Congress from other states may have. Senator Carper noted that his concerns focused on Delaware’s economy and its ability to remain competitive in business. Senator Carper then noted that the position of Census Director was vacant, but that he believed that the Acting Director and Acting Deputy Director were both well regarded and that “everyone loves” them. He further noted that Secretary Ross knew them well and hoped he would consider them to be permanent candidates for the positions. Senator Carper offered to work with the Secretary to help Dr. Jarmin and Dr. Lamas through the confirmation process by promptly holding hearings (he sits on the Committee with jurisdiction over the confirmation process) and moving their nominations forward.

Senator Carper then referenced the joint letter he sent with Senator Feinstein on January 5, 2018, expressing concern about reinstating the citizenship question. His main concern, however, was with the negative effect on the Non-Response Follow-Up operation (NRFU), which historically has had a low response rate. Overall the Senator shared his support for an accurate census. He asked that the Secretary consider that adding a new question requires months of testing, cost overrun implications, and should seek a better return on response rates than having to enumerate. The call ended with the Senator stressing the importance of getting the census “done right.”

- Lower response rate/higher NRFU
- Acting leadership
- Testing
- Higher costs
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**Senator Tom Cotton (R. AR)**

On March 12, 2018, Secretary Ross and members of his staff spoke with Senator Cotton of Arkansas. Senator Cotton stated that he supports the reinstatement of a citizenship question on the 2020 Decennial Census. He said that such a question is necessary in order to ensure that DOJ has sufficiently accurate data to enforce Section 2 of the Voting Rights Act. Senator Cotton also stated that such a question was not unprecedented. He noted that the question appeared on the Decennial Census until 1950 and that a citizenship question is currently included in the ACS survey. Senator Cotton stated that he believed the data would be more precise and accurate if it was collected through the Decennial Census. Senator Cotton indicated that he believed the Census Bureau makes clear that any answers collected from respondents would not be shared with law enforcement. Senator Cotton noted that the reinstatement of the question was a common sense call. When asked about concerns unique to Arkansas, Senator Cotton stated that there are two communities that may be impacted by the reinstatement of a citizenship question: (1) Marshallese Islanders who live in Arkansas and (2) the poultry producers in Arkansas who rely on immigrant workers. Senator Cotton’s point about Marshallese Islanders focused more on their “hard-to-count” status than on the citizenship question itself.

Senator Cotton thanked Secretary Ross for taking the time to discuss the census with him, and the call concluded.

- Accurate data for enforcement of Section 2 of the Voting Rights Act
- Question has been asked in the past
- Accurate data
- Question is already asked in other surveys
As part of his decision-making process, Secretary Ross spoke to a number of different stakeholders about the Department of Justice’s request to reinstate the citizenship question on the 2020 Decennial. These notes attempt to memorialize those conversations. These are not verbatim transcripts and each summary reflects the recollections of attendees from the Department of Commerce. Every effort has been made to ensure these notes are an accurate reflection of Secretary Ross’s conversations with stakeholders.

**Senator Ted Cruz (R. TX)**

On March 12, 2018, Secretary Ross and members of his staff spoke to Senator Ted Cruz. The Senator thanked the Secretary for his time and noted that he sent a letter supporting DOJ’s request to reinstate the citizenship question to the Decennial Census. The Senator stated that it makes sense to ask a citizenship question and that granting DOJ’s request would be a good decision. Senator Cruz noted that the citizenship question was immensely important for many public policy questions including social services, welfare, education, voting, and others. He believes that accurate data enables policymakers to make better policy decisions. Senator Cruz also noted that there was a lot of variance in the estimates provided on citizen voting age population. Senator Cruz stated that he did not believe that interest groups opposing the question on the ground that it would discourage participation was based in fact. Senator Cruz noted that the American Community Survey (ACS) contains a citizenship question and that the Census Bureau has long collected citizenship information. Senator Cruz discounted the risk of litigation, stating that the attorneys general who provided their views on the reinstatement of a citizenship question would not necessarily litigate if the question is added. Senator Cruz next noted that sound public policy mandates the ability to determine who lives in a country, and that it is important to maintain accurate data about this. Senator Cruz noted that there have often been political differences over the census. For example, some believe that the Census Bureau should rely more on statistical sampling. Senator Cruz has significant concerns about statistical sampling since it can be manipulated. Senator Cruz referenced a prior conversation with the Secretary about the Census Bureau but he did not provide details. Senator Cruz noted that the Secretary was given the responsibility by the Constitution to collect accurate data, and the data is less than accurate now. Senator Cruz stated that if the Secretary reinstated the citizenship question on the Decennial Census, he would be on a firm foundation to do so.

- Accuracy
- Need for citizen voting age population
- Will not decrease response rate
- Improves public policy decisions
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Attorney General Jim Hood (D, MS)

On March 12, 2018, Secretary Ross and his staff spoke with Mississippi Attorney General Jim Hood. The Attorney General expressed his appreciation for the opportunity to provide input on the Department of Justice’s request to add the citizenship question to the 2020 Decennial Census.

Attorney General Hood noted that he opposed the reinstatement of a citizenship question on the Decennial Census for the reasons set forth in the February 12, 2018 letter that he signed (but did not write). He stated that the intent of the census is to count everyone, and that reinstating the citizenship question may lower response rates. AG Hood expressed concern that a number of migrant workers on sweet potato farms in the hills near Tupelo (in Northeast Mississippi), the sweet potato capital of the world, may be afraid to answer a citizenship question on the 2020 Decennial Census. AG Hood noted that sweet potato farms were a large source of revenue for Mississippi farmers. AG Hood noted that migrants come and go, and in addition to those who may be afraid to answer, some may be merely hesitant. AG Hood noted that he believed that migrants generally hesitate to provide information to the federal government about their immigration status. AG Hood noted that the intent of the census is to count everyone in the state. AG Hood referenced the portion of the February 12 letter that threatened injunctive relief should the Secretary add a citizenship question to the 2020 Decennial Census and noted that he was not sure he would join such a request. He stated that the injunctive relief sentiment seemed to come from the larger states, and that an injunction if granted would tie the issue up in litigation, which would not be good for anyone. AG Hood restated his preference for a simple short form census, and noted that it would be a waste of resources.

AG Hood ended the call by thanking Secretary Ross for taking the time to call him on this issue, noting that during his 14 years as Attorney General, he has never known another Secretary who has dedicated as much time to the census. AG Hood noted that it was good for the Secretary to take the time to make calls to stakeholders and assess the risks associated with granting DOJ’s request.

- Fear in immigrant community
- Government mistrust
- Litigation risk and costs
As part of his decision-making process, Secretary Ross spoke to a number of different stakeholders about the Department of Justice’s request to reinstate the citizenship question on the 2020 Decennial. These notes attempt to memorialize those conversations. These are not verbatim transcripts and each summary reflects the recollections of attendees from the Department of Commerce. Every effort has been made to ensure these notes are an accurate reflection of Secretary Ross’s conversations with stakeholders.

Senator Ron Johnson (R, WI)

On March 12, 2018, Secretary Ross and members of his staff spoke with Senator Johnson of Wisconsin. Senator Johnson stated that he supports the reinstatement of a citizenship question to the 2020 Decennial Census. He noted that the question would be helpful in making determinations about federal welfare benefits and voting rights.

Senator Johnson noted that there would likely be political pushback if the citizenship question is reinstated, and he noted that he expected the Department and the Census Bureau to be able to answer questions about how the Census Bureau planned to conduct a full enumeration if the citizenship question is reinstated on the Decennial Census. Senator Johnson noted that he was considering holding a hearing to discuss and better understand the facts supporting reinstatement, should the Secretary exercise his discretion to reinstate the question. When asked about concerns unique to Wisconsin, Senator Johnson noted that the dairy industry in Wisconsin relies on immigrant workers.

Senator Johnson also raised the issue of steel tariffs and the potential impact of those tariffs in Wisconsin. Senator Johnson thanked Secretary Ross for taking the time to discuss the census with him, and the call concluded.

- Improves public policy decisions
- Complete enumeration
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Attorney General Jeff Landry (R. LA)

On March 12, 2018, Secretary Ross and members of his staff spoke to Attorney General Jeff Landry of Louisiana. The AG thanked the Secretary for taking the time to speak about DOJ’s request to add the citizenship question to the Decennial Census. The AG noted that his views supporting reinstatement of a citizenship question on the Decennial Census were set forth and best stated in the February 8, 2018 letter he sent to the Secretary. AG Landry noted that states have a lot of flexibility when it comes to redistricting, and having accurate data about citizen voting age population would better inform the state legislatures charged with carrying out the task of redistricting. AG Landry further noted his belief that the average resident on the streets of Louisiana believed that the census should ask about citizenship and that it was a no brainer. AG Landry stated that inclusion of the question would not be unprecedented. He noted that the following state attorneys general likely shared his view that the Secretary should reinstate a citizenship question on the 2020 Decennial Census: Steve Marshall (AL), Tim Fox (MT), Derek Schmidt (KS), and Doug Peterson (NE). AG Landry further noted that the Solicitor General of Texas also likely supported reinstatement of the question while Attorney General Rutledge of Arkansas seemed opposed to reinstating the citizenship question but had taken the matter under advisement.

- Question has been asked in the past
- Need for citizen voting age population
- Fairer redistricting
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Congresswoman Carolyn Maloney (D. NY)

On March 12, 2018, Secretary Ross and members of his staff spoke to Representative Maloney. The Congresswoman thanked the Secretary for his time and noted that she looked forward to receiving responses to the questions she submitted after her October 2017 hearing. She stated that she appreciated the Secretary’s commitment to a full and accurate census, but noted that she opposed any late changes to the questions on the 2020 Decennial Census questionnaire. Congresswoman Maloney further stated that she feared that undocumented immigrants would not answer the questions if asked for citizenship status. She noted that she understood that the Secretary would need to make his decision about which questions appeared on the Decennial Census questionnaire by March 31. Congresswoman Maloney noted that new questions are usually tested and expressed concern that the addition of any new presumably untested citizenship question would be counterproductive. Congresswoman Maloney described the perceived fear of deportation in the immigrant community. Congresswoman Maloney discussed the need to zero in on getting a permanent Director and a Deputy Director at the Census Bureau. She encouraged the Secretary and Under Secretary Kelley to put lots of effort into the search and to work with the acting Director and Deputy Director, both of whom have impressed the Congresswoman. Congresswoman Maloney suggested that maybe the two acting officials should be made permanent, but that there had been no recommendation to do so to date. Congresswoman Maloney next discussed the status of hiring partnership specialists, and the Secretary informed her that he had hired 1,000, which is 200 more than in 2010. Congresswoman Maloney then reiterated her concern that the census should not contain a citizenship question due to high levels of government mistrust. She further noted that she expected there would be lots of pushback if a citizenship question is reinstated on the Decennial Census. Congresswoman Maloney discussed the importance of the 2nd Avenue subway in New York and plans for public-private partnerships to move the project forward. The Secretary recommended she speak with Secretary Chao because transportation projects are generally the purview of the Department of Transportation.

- Lower response rate
- Testing
- Government mistrust
- Acting leadership
- Partnership specialists
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**Attorney General Tom Miller (D, IA)**

On March 12, 2018, Secretary Ross and his staff spoke with Iowa Attorney General Tom Miller. The Attorney General stated his opposition to the addition of a citizenship question to the 2020 Decennial Census. He discussed the importance of the census and Iowa’s reliance on its results with total and absolute credibility. His objection to the addition of the question centers around “the human nature of immigrants,” and he noted that immigrants feel a significant amount of anxiety about answering this question. They fear giving information to the federal government.

The Attorney General also expressed concern about the lack of testing for a citizenship question. He noted the requirement that there be testing on new questions. And he also noted that there are other ways that DOJ may be able to get citizenship information and conjectured as to whether the information is actually critical.

During the call, Attorney General Miller noted his appreciation of the President’s support for DACA reform.

- Fear in immigrant community
- Government mistrust
- Testing
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Dr. Steven Camarota, Director of Research for the Center for Immigration Studies (CIS)

On March 13, 2018, Secretary Ross and members of his staff spoke with Dr. Steven Camarota, Director of Research for the Center for Immigration Studies (CIS). Dr. Camarota thanked the Secretary for the opportunity to share his thoughts on DOJ’s request to add the citizenship question to the Decennial Census.

Dr. Camarota noted that as a general matter, researchers like him want to work with the broadest data sets possible because broader data sets allow for higher quality analysis. Dr. Camarota noted that the ACS data does not provide local block level (CVAP) information, and that this information can only be obtained through the Decennial Census. He believes local level data can serve as a benchmark to compare the accuracy of the data obtained through the ACS. Dr. Camarota also noted that any decrease in response rate resulting from the addition of a citizenship question could be mitigated through surveys. Dr. Camarota stated that local level data is necessary because it can inform a wide range of public policy matters, including voter turnout rate, registration rate, and where to locate polling places. It can also help estimate migration and better understand migration patterns.

Dr. Camarota stated that concerns about decreased participation are unfounded and that citizenship questions are currently included on a number of surveys, including the ACS, the Population Survey, and Survey of Income and Program Participation (SIPP). Dr. Camarota noted that this data is used to research issues like unemployment, welfare, healthcare, and others. Dr. Camarota also noted that although he is aware of a general sentiment that the addition of a citizenship question to the Decennial Census would decrease response rates, he has not seen any evidence to that effect. If the Secretary chooses to add the citizenship question, Dr. Camarota suggested that the monthly current population survey could be used to determine whether it was the addition of that question that caused response rates to decrease or whether response rates had already decreased at the start of the current presidential administration.

Finally, Dr. Camarota added that the citizenship question can help localities better plan for the future, and suggested additional data points that could be collected through additional questions about foreign born respondents on future Decennial Censuses.

- More data leads to better analysis
- Current local level data is insufficient
- Question is already asked in other surveys
- Will lead to better benchmarking
- Will not decrease response rate
- Improves public policy decisions
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Vanita Gupta, President & CEO, Leadership Conference on Civil and Human Rights

On March 13, 2018, Secretary Ross and members of his staff spoke to Vanita Gupta, President and CEO of the Leadership Conference on Civil and Human Rights. Ms. Gupta thanked the Secretary for the opportunity to share her thoughts and views on the Department of Justice’s request to add the citizenship question to the 2020 Decennial Census.

Ms. Gupta stated that she opposed adding the citizenship question to the Decennial Census. Ms. Gupta noted that as the former acting head of the Civil Rights Division of the Department of Justice (which requested the addition of the question in December 2012), she knew personally that the ACS citizenship data on which DOJ has relied to enforce the Voting Rights Act (“VRA”) was sufficient to do so. Ms. Gupta further noted that in her current position, she kept a “close eye” on VRA enforcement litigation and her position is no different today than it was when she served at DOJ Civil Rights.

Ms. Gupta next underscored her concern that adding the citizenship question would have a chilling effect on the immigrant population, undermine the efforts of the Census Bureau to conduct a complete and accurate census, lead to expensive litigation, and cause a devastating impact on potential partnership opportunities. She stated her concern that all of these issues would drive up costs.

Ms. Gupta believes that conducting a Decennial Census is a non-partisan effort and that good work can be done. Ms. Gupta suggested that the Secretary speak to former Census Directors, and concluded by offering herself as a resource. Ms. Gupta wants to be “all-in” to help conduct a successful census.

- ACS data is sufficient
- Lower response rate
- Litigation risk and costs
- Confidentiality concerns
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Jerry Howard, CEO the National Association of Homebuilders (NAHB)

On March 13, 2018, Secretary Ross and members of his staff spoke Gerald “Jerry” Howard, CEO of the National Association of Home builders (NAHB). Mr. Howard indicated that even though his association does not have a position on DOJ’s request to add a citizenship question to the Decennial Census, his organization wants the census to be transparent and to succeed.

Mr. Howard then asked about ongoing lumber negotiations and stated that he would follow up with information from NAHB that will be sent separately to Commerce staff.
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Ditas Kitague, California Census Coordinator; Dan Torres, Director of Immigrant Integration

On March 13, 2018, Secretary Ross and members of his staff spoke to Ditas Kitague, the California Census Coordinator, and Dan Torres, the Director of Immigrant Integration. Keely Bosler, the Cabinet Secretary to Governor Jerry Brown, was scheduled to join the discussion but was unable to do so.

Ms. Kitague and Mr. Torres thanked the Secretary for the opportunity to share their views, and reiterated their commitment to helping the Census Bureau obtain a complete and accurate count of the population. Ms. Kitague noted that this is her third Decennial Census. She noted that California presents significant issues with online self-response because 31 percent of California’s population is considered underconnected or not connected to the internet. Ms. Kitague noted that a telephone response option would be helpful for these groups. Ms. Kitague further noted that she is partnering with the Census Bureau to hire operational support specialists.

Regarding the citizenship question, Ms. Kitague was concerned it would have a chilling effect on participation and increasing the undercounted population. She also noted that certain portions of the population in California are generally distrustful of all government agencies. Ms. Kitague noted that certain victims of the California wildfires were reluctant to provide information to the government officials providing relief and aid. Ms. Kitague did not know whether the addition of a citizenship question would amplify this distrust and depress the response rate even further, but she was not aware of any evidence that it would. Ms. Kitague noted that the addition of a citizenship question to the Decennial Census could cause confusion among the 4.7 million Californians (12% of the state’s total population) who live in households where the residents have mixed citizenship status. Ms. Kitague also noted that 10 million Californians (27% of the state’s total population) are foreign born, and of those 10 million approximately 50 percent are naturalized citizens.

Mr. Torres noted that Californians were concerned that their response data would not be kept confidential and that concern over the citizenship question is likely exacerbated by Californian’s increasing distrust in government. Mr. Torres then reiterated the example of the difficulties government officials had in obtaining information from victims of the wildfires who needed relief. Mr. Torres also noted that immigrants in particular seemed afraid to seek shelter or aid from government officials.

- Confidentiality concerns
- Lower response rate
- Government mistrust
- Confusion in mixed households
March 13, 2018

MIKE HUNTER
ATTORNEY GENERAL

Secretary Wilbur Ross
United States Department of Commerce
1401 Constitution Ave. NW
Washington, D.C., 20233

Re: Request to Reinstate Citizenship Question on 2020 Census Questionnaire

Dear Secretary Ross,

As Attorneys General and Governors, we write requesting the Department of Commerce to reintroduce the question asking a person's citizenship in the long form questionnaire for the 2020 Census. Citizenship means something, and statistical information on the state of citizenship in our country is vital to the functioning of our democracy. The lack of reliable data on citizenship degrades each citizen's right to participate in free and fair elections. When legislators determine districts based on population and without access to accurate statistics on citizenship, the result is that legally eligible voters may have their voices diluted or distorted. Matters of such constitutional importance should not be unnecessarily imperiled when the solution is as simple as a question on a census form.

From 1970 until the 2010 Census, the Census Bureau provided this data by including a citizenship question on its "long form" questionnaire during each decennial census. Since this practice was discontinued in the 2010 Census, state officials have been denied access to equally reliable data. The decennial census is the best method to collect data about citizenship. It has significant advantages over the method currently used: the American Community Survey (ACS). The ACS, for example, draws data from a significantly smaller sample size: only 1 in every 38 households is selected to participate in the survey. This smaller sample size translates to larger margins of error. Moreover, the ACS data is not temporally consistent with decennial census data. Rather, ACS data is collected over time and only later aggregated into one-year and five-year estimates. These estimates do not align with the total and voting-age population data from the decennial census.

To comply with the Constitution's one-person, one-vote requirement, States use the total population data from the decennial census. See Evenwel v. Abbott, 136 S. Ct. 1120 (2016). In the absence of citizenship information derived from the decennial census, state officials must resort to using ACS citizenship estimates that do not match with the total population data provided by the Census. But the ACS data is inferior, because it lacks the scope and level of detail that the decennial census provides. And even if the data were equally accurate, the ACS data come from surveys conducted at different times than the decennial census data; thus, when legislators need to draw districts that incorporate different data from both surveys, the result contains internal inconsistencies because the data sets do not mesh. This unnecessarily complicates any constitutional analysis and deprives legislators, courts, and citizens of their confidence in the districting process.
incorporate different data from both surveys, the result contains internal inconsistencies because the
data sets do not mesh. This unnecessarily complicates any constitutional analysis and deprives
legislators, courts, and citizens of their confidence in the districting process.

Adding a citizenship question would also alleviate courts of significant litigation. Section 2 of the
Voting Rights Act has been interpreted to mandate that redistricting cannot result in racial “vote
dilution,” which occurs when a racial minority is improperly deprived of a single-member district in
which it could form a majority with the ability to elect the candidate of their choice. Thornburg v. Gingles,
478 U.S. 30, 50 (1986). Courts have held that the proper metric for determining whether a racial group
could constitute a majority in a single member district is the citizen voting-age population. Reyes v. City
of Farmers Branch, 586 F.3d 1019, 1023-24 (5th Cir. 2009); Barnett v. City of Chicago, 141 F.3d 699, 704
(7th Cir. 1998); Negron v. City of Miami Beach, 113 F.3d 1563, 1567-69 (11th Cir. 1997); Romero v. Pomona,
883 F.2d 1418, 1426 (9th Cir. 1989), overruled in part on other grounds by Townsend v. Holman Consulting
Corp., 914 F.2d 1136 (9th Cir. 1990).

This is especially important for districts with minority groups that have a large non-citizen population,
because in such districts good data is necessary to ensure that the citizen population is large enough to
elect that minority group’s candidate of choice. But without access to accurate data, the States cannot
obtain certainty about whether they comply with the Voting Rights Act’s requirements. The result is
protracted litigation and the possibility that minority populations will be unable to elect the candidate
of their choice. Finally, adding a citizenship question would improve the public policy of States and
municipalities. Equitably distributing voting power will translate to more equitable policies that reflect
the values of the local citizenry.

Citizenship still matters. It is a privilege that is important and meaningful, and not lightly ignored.
Non-citizens can be valuable members of our community, but citizenship rightly confers benefits and
responsibilities that must be taken seriously. Chief among them is the right to vote. Voting is the most
precious right of every citizen—it provides the means to participate, to influence, and to articulate his
concerns to the government. Including a simple question in the census will impose a minimal burden
on the government and the residents surveyed, but this small step will have a significant and positive
impact on the policies and constitution of our great republic. But failing to accurately account for our
citizenry harms the rights of our citizens, perhaps especially our minority and immigrant citizens. In
order to have accurate and usable data regarding voting-age citizens in the United States, we
respectfully request that the 2020 Census include a question regarding citizenship.

Respectfully,

Mike Hunter
Attorney General of Oklahoma

Derek Schmidt
Attorney General of Kansas
Bill Schuette  
*Attorney General of Michigan*

Douglas J. Peterson  
*Attorney General of Nebraska*

Leslie C. Rutledge  
*Attorney General of Arkansas*

Matthew C. Bevin  
*Governor of Kentucky*

Phil Bryant  
*Governor of Mississippi*

Patrick Morrisey  
*Attorney General of West Virginia*

Curtis T. Hill  
*Attorney General of Indiana*

Alan Wilson  
*Attorney General of South Carolina*

Christopher M. Carr  
*Attorney General of Georgia*

Herbert H. Slatery III  
*Attorney General of Tennessee*

Pam Bondi  
*Attorney General of Florida*
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Arturo Vargas, NALEO

On March 13, 2018, Secretary Ross and members of his staff spoke to Arturo Vargas, the Executive Director of National Association of Latino Elected Officials (NALEO) Educational Fund. Mr. Vargas thanked the Secretary for the opportunity to share his views on DOJ’s request to add the citizenship question to the 2020 Decennial Census.

Mr. Vargas stated that he feels very strongly about encouraging participation in a census that is both safe and confidential. Mr. Vargas noted, however, that members of his community were skeptical that data provided in response to census questions would be kept confidential and that it would not be shared with other agencies. Mr. Vargas noted that it is not necessary to ask a question on citizenship because the data is collected in response to a citizenship question on the ACS, making any question on the decennial redundant. Mr. Vargas notes that ACS data is more reliable than decennial data would be because decennial data would quickly become obsolete. Mr. Vargas is concerned that the question will make it more difficult for organizations like his to encourage census participation, causing an increased need to hire enumerators. According to Mr. Vargas, adding a citizenship question will both drive up NRFU costs and simultaneously raise skepticism as to the timing of the question being added. Mr. Vargas noted that the fact that the citizenship question has not been tested would also decrease response rates (noting 18 percent of the population is Latino). To date, Mr. Vargas has heard from local trusted messengers that they are not comfortable encouraging participation in a census that contains the citizenship question given the current political environment.

Mr. Vargas emphasized how important it is to obtain a complete count of the U.S. population for reapportionment and critical federal funding allocation. He concluded by asking the Secretary to decline to add the citizenship question and explained that such an act would generate goodwill and help overcome setbacks the Census Bureau has experienced over the years, including cost overruns.

- Government mistrust
- ACS data is sufficient
- Inaccurate – ACS data is more accurate (ACS)
- Lower response rate/higher NRFU
- Higher costs
- Testing
- Confidentiality concerns
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Bruce Chapman, former Director of the Census Bureau

On March 15, 2018, Secretary Ross and his staff spoke with Bruce Chapman. Mr. Chapman stated that reinstating the citizenship question would make existing data on citizenship more accurate. Mr. Chapman noted that prior censuses included a question on citizenship and that when he was Director it would have been helpful to have the data on citizenship. Mr. Chapman also noted that as a general matter, it is a good idea for the Census Bureau to have data on citizenship. Mr. Chapman stated that the impact of any reduced response rate (should it exist) could be mitigated through the follow-up surveys and imputation through the use of administrative records. Mr. Chapman concluded by stating his belief that the way to obtain the most accurate data on citizenship would be to ask the question on the Decennial Census and then cross-reference responses against administrative records and other Census Bureau surveys.

- Need accurate citizenship data
- Ask the question and use administrative records
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Congressman Gerry Connolly (D. VA)

On March 15, 2018, Secretary Ross and members of his staff spoke with Congressman Gerry Connolly of Virginia. The Congressman thanked the Secretary for the opportunity to share his thoughts and views on the Department of Justice’s request to reinstate the citizenship question on the 2020 Decennial Census.

Congressman Connolly expressed his opposition to the addition of a citizenship question to the 2020 Decennial Census. Specifically, he expressed concern that his district would be impacted because it has a large number of foreign-born residents, and that immigrants generally distrust government surveys, regardless of citizenship status. Congressman Connolly noted that this concern would likely be exacerbated due to the current political climate even though the citizenship question seemed like an innocent one on its face. He cited to rumors within the immigrant community that census data would be used to increase high profile deportations by ICE. Congressman Connolly noted the example of a “beloved coach” who was detained and deported after living in the U.S. for 15 years. He also cited the example of a “dreamer” who only learned at age 16 that she had not been born in the United States. Congressman Connolly stated that the reinstatement of the question would likely discourage participation and “spook” members of the immigrant communities. Congressman Connolly also stated his concern that adding a citizenship question would make it harder for the Department and the Census Bureau to do their job of counting the entire population and that increased follow up efforts could lead to increased overall costs. Keeping the question off the Decennial Census, on the other hand, would minimize inaccuracies, streamline the process, and avoid unnecessary costs. Congressman Connolly stated that there were other mechanisms to collect citizenship data from residents, but that including a question on the Decennial Census would be an impediment to enumerating the entire population. Congressman Connolly stated that he hoped that the Department would be able to conduct a successful census.

Finally, Congressman Connolly stated that the citizenship question need not be reinstated on the Decennial Census because it is already included in other surveys. Congressman Connolly did not state whether or not he had reason to believe the data collected in response to the survey questions was accurate. Regardless, he reiterated his position that the question need not be part of the Decennial Census. Congressman Connolly also noted that the Decennial Census is “special” because it is mandated by the Constitution.

- Government mistrust
- Confidentiality concerns
- Lower response rate/higher NRFU
• Higher costs
• Question is already asked in other surveys
Dr. Ron Jarmin  
Performing the Non-Exclusive Functions and Duties of the Director  
U.S. Census Bureau  
United States Department of Commerce  
Washington, D.C. 20233-0001  

March 15, 2018  

Dear Dr. Jarmin:  

I write as one member of the U.S. Commission on Civil Rights, and not on behalf of the Commission as a whole, to urge that the 2020 Census include a citizenship question.

I am aware that the Department of Justice has already requested the inclusion of a citizenship question in the 2020 Census so that it can properly enforce Section 2 of the Voting Rights Act.¹ I urge you to include a citizenship question for a similar, but not identical, reason. It is not only important that votes not be diluted on racial grounds. It is also important that all citizens in a state have their votes weighted equally, and that the votes of citizens of different states should also have roughly the same weight. When noncitizens, particularly illegal aliens, are counted as citizens for purposes of apportionment, this goal is undermined. It shifts votes away from states that have a lower percentage of non-citizens to states that have a higher percentage of non-citizens. Within states, it also shifts weight away from voters in districts with small number of non-citizens to districts with large numbers of non-citizens, and makes it easier for candidates to win in the latter districts.²

I realize that a citizenship question would not ask if an individual is in the country legally or illegally. However, it would be possible for Congress or a state to apply statistical analysis to determine what percentage of non-citizens within a state are in the country illegally and to use that information to draw legislative districts. Even if the information is imperfect, it is better than no information at all.

I realize that Congress is unlikely to act to exclude illegal aliens from apportionment, particularly because states that have large number of illegal aliens would fiercely fight such a change for fear


Counting illegal aliens in congressional apportionment creates a set of modern-day rotten boroughs – political districts with representatives who are elected by a pitifully small number of voters. Those who believe illegal aliens should count in apportionment say that they deserve representation, too. The 14th Amendment does call for apportionment to be based on “the whole number of persons” in each state. But we don’t count tourists or business travelers who are here legally; why should we count illegal aliens?
they might lose a congressional seat. However, states are free to draw their districts based on the number of citizens present, not the number of individuals, and we should give them the data to do so. As the Supreme Court has said:

Neither in Reynolds v. Sims nor in any other decision has this Court suggested that the States are required to include aliens, transients, short-term or temporary residents, or persons denied the vote for conviction of crime in the apportionment base by which their legislators are distributed and against which compliance with the Equal Protection Clause is to be measured. The decision to include or exclude any such group involves choices about the nature of representation with which we have been shown no constitutionally founded reason to interfere. Unless a choice is one the Constitution forbids, cf., e.g., Carrington v. Rash, 380 U.S. 89, 85 S.Ct. 775, 13 L.Ed.2d 675, the resulting apportionment base offends no constitutional bar, and compliance with the rule established in Reynolds v. Sims is to be measured thereby.

For example, the Nebraska Constitution provides that “The basis of apportionment shall be the population excluding aliens, as shown by the next preceding federal census.” A Nebraska state senator has introduced a bill that would follow this provision of the Nebraska Constitution when redistricting occurs after the next Census. With reliable citizenship information available from the 2020 Census, other states may wish to follow suit. Other states will likely prefer to dilute the votes of their citizens in favor of non-citizens. But states that want to ensure that the votes of eligible voters have roughly the same weight throughout the state should be able to do so.

Vast amounts of money and time have been expended in Section 2 “one person, one vote” litigation over the years in an effort to ensure that the votes weigh roughly the same, regardless of the voter’s race. It is at least as important to ensure that the votes of citizens are not diluted by the presence of non-citizens, particularly non-citizens who are in the country illegally.

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3 See generally Patrick J. Charles, Representation Without Documentation?: Unlawfully Present Aliens, Apportionment, the Doctrine of Allegiance, and the Law, 25 BYU J. Pub. L. 35 (2011) (arguing that when the Fourteenth Amendment was adopted, the understanding was “The whole number of persons in each State cannot mean everybody on the soil at the particular time, nor exclude everybody who may happen not to be on it at the same time, and of course should be authoritatively construed by the law-making power.”).


6 Charles, supra note 3, at 42. [O]nly through the elective franchise, the right to petition, and the legislative process can state legislatures and municipal governments be made to apportion according to citizenship. However, such encouragement starts with the citizens themselves, for only in response to their voice and opinion will state and municipal governments take action. In exercising this voice, it should be emphasized that not only does apportionment according to citizen interests ensure that every citizen’s voting power is equal, but it serves as a vehicle for petitioning Congress to remedy the Census Bureau’s counting of unlawful aliens for apportionment purposes.
Furthermore, this data would be useful for the citizens of the United States, especially given the now nearly two-decades-long national argument over immigration. How many non-citizens are in the country? How many are in the country compared to when the question was asked on the 2000 Census? What percentage are likely in the country illegally? Does it appear that non-citizens naturalize relatively quickly? All of this information is important for the American people to have. Perhaps it would alleviate concerns that there is such a large illegal immigrant problem that any amnesty is almost unthinkable. Perhaps it would reveal that naturalization is not proceeding as quickly as we would like, and that there might be something that can be done to speed the process. There would likely be interesting surprises in the data for everyone. But without the data, we cannot address any of this.

Lastly, if the citizenship data is collected, and if more states use it in redistricting, it would send a salutary message to our elected representatives: You are elected to represent American citizens. It appears some of our elected representatives forget this from time to time. It is also in the interests of certain organizations to blur the distinction between citizens and non-citizens. But it is a very important distinction, and one we should maintain, in part to encourage those who live among us but have not yet become part of our polity through naturalization to do so.

Sincerely,

[Signature]

Peter Kirsanow
Commissioner
March 20, 2018

The Honorable Peter Kirsanow  
Commissioner  
United State Commission on Civil Rights  
1331 Pennsylvania Avenue, NW  
Washington, DC 20425

Dear Commissioner Kirsanow:

Thank you for your recent inquiry regarding the U.S. Department of Justice’s (DOJ) request to add a citizenship question to the 2020 Census questionnaire. We appreciate your taking the time to make me aware of your position on this important matter.

The U.S. Department of Commerce (DOC) is conducting an orderly review of the DOJ’s request. The DOC is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a complete and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority.

We will keep you apprised of any developments regarding the citizenship question. If you have any additional questions or would like to discuss this matter further, please contact our Office of Congressional and Intergovernmental Affairs at 301-763-6100.

Sincerely,

Ron S. Jarmin  
Performing the Non-Exclusive Functions  
and Duties of the Director
As part of his decision-making process, Secretary Ross spoke to a number of different stakeholders about the Department of Justice’s request to reinstate the citizenship question on the 2020 Decennial. These notes attempt to memorialize those conversations. These are not verbatim transcripts and each summary reflects the recollections of attendees from the Department of Commerce. Every effort has been made to ensure these notes are an accurate reflection of Secretary Ross’s conversations with stakeholders.

Dr. Steven Murdock (Former Census Bureau Director, 2008-2009)

On March 15, 2018, Secretary Ross and his staff spoke to Dr. Steve Murdock, a former Census Bureau Director from 2008-2009. Dr. Murdock stated that he opposed the reinstatement of a citizenship question on the 2020 Decennial Census, noting that he did not believe that asking the question would make the census more accurate. Dr. Murdock stated that based on anecdotal information he received in connection with his research in the state of Texas, a large group of unidentified residents would go underground if the Decennial Census includes a citizenship question. Dr. Murdock noted that the Decennial Census was “key” because it decides how representatives are apportioned. To do so, a completed and accurate count is required. Dr. Murdock then stated that samples, such as those collected through the American Community Survey, are generally accurate. Because the census is not just a sample and because all residents receive it, it is harder to obtain accurate data than it is to obtain accurate data through surveys. Dr. Murdock cited to an undercount in Houston that resulted from a lack of willingness to respond to the Decennial Census. Dr. Murdock repeated his belief that the fact that everyone is required to respond to the Decennial questionnaire necessarily decreases the accuracy of the responsive data. Dr. Murdock further stated that longer questionnaires generally elicited lower rates of response, but that he was not sure there was a “breaking point” at which response rates were certain to trail off. Dr. Murdock noted that length and content of questions and questionnaires all impact response rates – the longer they are, the lower the response rates. Dr. Murdock stated that a long Decennial Census questionnaire would increase the likelihood of an inaccurate count and a less representative congress. It could also negatively impact redistricting and the federal and state programs that use census data.

Dr. Murdock noted that the census was “not a secret” and that if there is a negative response to the reinstatement of a citizenship question, it would not take long for that sentiment to ripple through the community. Dr. Murdock noted that the Hispanic community in particular would be concerned. Dr. Murdock acknowledged that there was no clear data to support this sentiment, but that he was nevertheless concerned about the potential reinstatement of the citizenship question.

- Lower response rate
- Accurate data
- Government mistrust
- ACS and other surveys more accurate
- Fairer redistricting
March 19, 2018

The Honorable Wilbur L. Ross
Secretary of Commerce
U.S. Department of Commerce
1401 Constitution Ave NW
Washington, DC 20230

Dear Secretary Ross:

On behalf of the Latino Community Foundation (LCF), we strongly urge you to reject the inclusion of a citizenship question to the 2020 Census. Ensuring a fair and accurate count for California's Latino community is of upmost importance to LCF, and this ill-timed, ill-advised addition will threaten that count for the state's largest ethnic group.

LCF is the premier statewide foundation focused on unleashing the power of Latinos in California. We fulfill our mission by building a movement of civically engaged philanthropic leaders, investing in Latino-led organizations, and increasing political participation of Latinos.

To accelerate impact for the Latino families we serve, it is imperative that we are also leveraging public dollars available to realize our mission. This is especially important as over five million Latinos in the state live in hard-to-count communities, due in part to immigration status. As the Latino population in California continues to grow, greater federal dollars are required to support this growth.

Including a citizenship question to the census will add to an extensive list of concerns that can and will suppress Latino participation. Increased immigration enforcement, anti-immigrant rhetoric in our political discourse, and privacy concerns have already meshed together to create a climate of fear and aversion of the federal government. In fact, a recent poll commissioned by LCF showed that over 50% of California's Latinos believe that their responses to the census might be shared with immigration authorities.

The U.S. Census is a cornerstone of our democracy. It is responsible for distributing $76 billion in federal funds to California and the method in which we ensure our political representation. A fair and accurate count is necessary for California's Latino community to assert their rightful claim to resources and political voice. We ask that you not include the citizenship question and maintain the integrity of this important civic duty for all people, regardless of immigration status.

Should you have any further questions, please contact Christian Arana, LCF Policy Director, at carana@latinocf.org.

Respectfully,

Jacqueline Martinez Garce!  
Chief Executive Officer

Christian Arana  
Policy Director
Congress of the United States
Washington, D.C. 20515

March 20, 2018

The Honorable Wilbur L. Ross, Jr.
Secretary
U.S. Department of Commerce
1401 Constitution Ave, NW
Washington, D.C. 20230

Dear Secretary Ross:

We urge you to reject any attempt to include a question regarding U.S. citizenship in the 2020 Decennial Census. Including such a question will lead to an increase in inaccurate responses and will depress response rates. As representatives of New York City, we rely on accurate census data, and an inaccurate decennial census count will have a devastating impact on our ability to serve our constituents and ensure that they receive the resources they need.

The City of New York estimates that approximately 2.6 percent of its residents, or 225,000 people, were not counted in the 2010 Decennial Census. Administering the decennial census is already a challenge in New York City, which has a high percentage of communities that are deemed “hard-to-count” by the Census Bureau: persons who do not speak English fluently, lower income persons, homeless persons, undocumented immigrants, young mobile persons, children, etc. Recent qualitative data released by the Census Bureau shows that survey respondents expressed “unprecedented” levels of concern with the confidentiality of their data and who has access to their responses regarding immigration. These concerns caused respondents to provide incorrect or incomplete information in an effort to protect themselves and their families. Adding a question about citizenship or immigration status to the 2020 Decennial Census will only exacerbate these existing challenges.

An undercount in the 2020 Decennial Census will have a devastating, decade-long impact on New York State and New York City. Data from the decennial census is used to allocate approximately $700 billion dollars to states and municipalities each fiscal year, and inaccuracies and depressed response rates in survey responses could easily lead to the misallocation of billions of dollars each fiscal year. It is our sincere hope that you will reject any attempt to add a question on citizenship to the 2020 Decennial Census. Doing so will result in depressed and inaccurate response rates, which could have a real and direct impact on the resources that New York City residents receive from the federal government over the next decade. Thank you for your consideration of this request.

Sincerely,

Grace Meng
Member of Congress

José E. Serrano
Member of Congress

Carolyn B. Maloney
Member of Congress
March 23, 2018

The Honorable Grace Meng
U.S. House of Representatives
Washington, DC 20515

Dear Representative Meng:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a complete and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I have conducted a rigorous review and produced a new 2020 Census lifecycle cost estimate, and I have put into place the people, processes, and programs necessary to ensure strong governance and oversight of the 2020 Census.

We will keep you apprised of any developments regarding the citizenship question. If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross
March 23, 2018

The Honorable Jose Serrano
U.S. House of Representatives
Washington, DC 20515

Dear Representative Serrano:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a complete and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I have conducted a rigorous review and produced a new 2020 Census lifecycle cost estimate, and I have put into place the people, processes, and programs necessary to ensure strong governance and oversight of the 2020 Census.

We will keep you apprised of any developments regarding the citizenship question. If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross
March 23, 2018

The Honorable Carolyn Maloney  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Maloney:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a complete and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I have conducted a rigorous review and produced a new 2020 Census lifecycle cost estimate, and I have put into place the people, processes, and programs necessary to ensure strong governance and oversight of the 2020 Census.

We will keep you apprised of any developments regarding the citizenship question. If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross
March 21, 2018

The Honorable Wilbur L. Ross  
Secretary of Commerce  
U.S. Department of Commerce  
1401 Constitution Avenue, NW  
Washington, DC 20230

Dear Mr. Secretary,

We are leaders of some of our nation’s largest and oldest nonpartisan philanthropic institutions giving hundreds of millions of dollars each year to advance the common good and improve quality of life in the United States. We have different funding priorities, are ideologically diverse, and do not always agree with each other. However, we have come together to support the Census Bureau’s efforts to achieve a fair and accurate census.

We share a commitment to reliable and accurate data as a necessary foundation for a well-functioning government, robust civil society, and thriving business sector in the United States. With these shared interests in mind, we write to raise our profound concerns about adding a new question regarding citizenship status to the 2020 Census questionnaire. Adding such a question would undermine the accuracy of 2020 Census data.

Despite the Census Bureau’s best efforts, recent decennial censuses have resulted in net undercounts of many communities, with consequences for drawing political boundaries, disbursing roughly $700 billion in federal funds annually, and facilitating business and economic development. Adding a citizenship question without sufficient testing further jeopardizes the quality of the upcoming census. What the Bureau learned when researching respondent confidentiality concerns is troubling enough to warrant substantial testing of such a question. A September 20, 2017 Census Bureau memo from the Center for Survey Management noted that “fears, particularly among immigrant respondents, have increased markedly this year.” That memo further stated, “These findings are particularly troubling given that they impact hard-to-count populations disproportionately, and have implications for data quality and nonresponse.” Similarly, previous Census Bureau directors have noted that adding a citizenship question without necessary testing endangers the quality of all census data, because it could discourage census participation among the tens of millions of households with non-citizen members as well as have unknown impacts on other populations.

The 2020 Census is so near that the once-a-decade end-to-end test arguably represents the last reasonable chance to have tested a substantial revision to the questionnaire. That test is well underway in Providence, Rhode Island without the citizenship question being asked. Other tests, including of non-traditional addresses and languages other than English, were previously canceled due to funding limitations and uncertainty. Long-time census experts and observers are unified in their belief that the decennial census has been and continues to be underfunded. As a result, it does not seem possible that the Census Bureau could conduct a high-quality test to learn how and to what extent a new citizenship question could undermine the quality of 2020 Census data.

Our institutions have appreciated a strong working relationship with Census Bureau staff, in some cases stretching back decades. We have previously supported and are again supporting research, education, outreach, and other efforts to help the Bureau fulfill its goal of counting
everyone once, only once, and in the right place. Adding a citizenship question at this late date seriously threatens any chance of achieving that goal.

As it is, the Census Bureau faces daunting challenges to fulfill its constitutional obligation to produce an accurate decennial census in 2020. Funding shortfalls, the need to develop new and unprecedented data and information infrastructure, and the lack of a Senate-confirmed director for this first high-tech census already raise worries about the Bureau’s ability to produce a reliable and accurate count. Now is not the time to add a new, untested citizenship question.

We would be pleased to meet with you should you like more information about our philanthropic efforts to support an accurate census or discuss the citizenship question. We thank you for your consideration of these concerns, and for your leadership on the census.

Sincerely,

Alexie Torres
Executive Director
Access Strategies Fund
Cambridge, MA

Sara Kay
Chief Executive Officer
Bernard and Anne Spitzer Charitable Trust
New York, NY

Randy Royster
President and CEO
Albuquerque Community Foundation
Albuquerque, NM

Kathleen R. Annette
President/CEO
Blandin Foundation
Grand Rapids, MN

Patrick McCarthy
President and Chief Executive Officer
The Annie E. Casey Foundation
Baltimore, MD

Antonia Hernandez
President & CEO
California Community Foundation
Los Angeles, CA

Sampriti Ganguli
Chief Executive Officer
Arabella Advisors
Washington, D.C.

Sandra Hernandez, MD
President and CEO
California Health Care Foundation
Oakland, CA

Nancy R. Bagley
President
Arca Foundation
Washington, D.C.

Judy Beik
President and CEO
The California Wellness Foundation
Los Angeles, CA

Audrey Yamamoto
President & Executive Director
Asian Pacific Fund
San Francisco, CA

Tom Chavez
President/CEO
Chavez Family Foundation
San Francisco, CA

Gary D. Bass
Executive Director
Bauman Foundation
Washington, D.C.

Bob Glaves
Executive Director
The Chicago Bar Foundation
Chicago, IL
Helene D. Gayle
President & CEO
The Chicago Community Trust
Chicago, IL

Jennifer Leith
Executive Director
The Douty Foundation
Philadelphia, PA

Michael Cheever
Interim President
College Success Foundation
Washington, D.C.

James W. Head
President and Chief Executive Officer
East Bay Community Foundation
Oakland, CA

Alicia Philipp
President
Community Foundation for Greater Atlanta
Atlanta, GA

Melissa Beck
Executive Director
The Educational Foundation of America
Hudson Valley, New York

Dolores E. Roybal
Executive Director
Con Alma Health Foundation
Santa Fe, NM

The Reverend Arrington Chambliss
Executive Director
Episcopal City Mission
Boston, MA

Leslie Ramyk
Executive Director
Conant Family Foundation
Chicago, IL

Nicky Goren
President and CEO
Eugene and Agnes E. Meyer Foundation
Washington, D.C.

Yanique Redwood, PhD
President and CEO
Consumer Health Foundation
Washington, D.C.

Angelique Power
President
The Field Foundation
Chicago, IL

Jeanne Whitman Bobbitt and Helen Holman
Interim Co-Presidents
The Dallas Foundation
Dallas, TX

Darren Walker
President
Ford Foundation
New York, NY

Michael M. Parks
President
The Dayton Foundation
Dayton, OH

Kiki Jamieson
President
The Fund for New Jersey
Princeton, NJ

Joe Goldman
President
Democracy Fund
Washington, D.C.

Marcos Vargas, Ph.D.
Executive Director
Fund for Santa Barbara
Santa Barbara, CA

David Geenen
Executive Director
Doris and Victor Day Foundation
Rock Island, Illinois

David T. Abbott
Executive Director
The George Gund Foundation
Cleveland, Ohio
Gregg Behr  
*Executive Director*  
The Grable Foundation  
Pittsburgh, PA

Deanna Gomby  
*President and CEO*  
Heising-Simons Foundation  
Los Altos, CA

Chris Fulton  
*Executive Director*  
Grand Rapids Area Community Foundation  
Grand Rapids, MN

Daphne Rowe  
*Executive Director*  
The Hilles Fund  
Ardmore, PA

Nancy Bales  
*Executive Director*  
Gray Family Foundation  
Portland, OR

Ann Marie Hornor  
*Board Chair*  
The Horner Foundation  
Philadelphia, PA

Andrew D. Kopplin  
*President & CEO*  
Greater New Orleans Foundation  
New Orleans, LA

Phylis Glink  
*Executive Director*  
Irving Harris Foundation  
Chicago, IL

Vanessa Daniel  
*Executive Director*  
Groundswell Fund  
Oakland, CA

Donald J. Howard  
*President and CEO*  
The James Irvine Foundation  
San Francisco, CA

Leslie Dorosin and Rebekah Saul Butler  
*Co-Executive Directors*  
The Grove Foundation  
Los Altos, CA

Julia Stasch  
*President*  
John D. and Catherine T. MacArthur Foundation  
Chicago, IL

Jay Williams  
*President*  
Hartford Foundation for Public Giving  
Hartford, CT

Ellen Alberding  
*President*  
Joyce Foundation  
Chicago, IL

Micah A. Kāne  
*President and CEO*  
Hawaii Community Foundation  
Honolulu, HI

Jacqueline Martinez Garcel  
*CEO*  
Latino Community Foundation  
San Francisco, CA

David Nicholson  
*Executive Director*  
Headwaters Foundation for Justice  
Minneapolis, MN

Gilda (Gigi) Pedraza  
*Executive Director*  
Latino Community Fund (LCF Georgia)  
Atlanta, Georgia

Bridget McCandless, M.D.  
*President/CEO*  
Health Care Foundation of Greater Kansas City  
Kansas City, MO

Peter Bloch Garcia  
*Executive Director*  
Latino Community Fund of Washington State  
Seattle, WA
Ann H. Lederer
Director
Lederer Foundation
Lakewood, CO

Caitlin Davis
Executive Director
Legal Foundation of Washington
Seattle, WA

Unmi Song
President
Lloyd A. Fry Foundation
Chicago, IL

Sol Marie Alfonso Jones
Senior Program Officer
Long Island Community Foundation
Melville, NY

Thomas Peters, Ph.D.
President & CEO
Marin Community Foundation
Novato, CA

Justin Maxson
Executive Director
Mary Reynolds Babcock Foundation
Winston-Salem, NC

Wendy Lewis
Executive Director
McCune Charitable Foundation
Santa Fe, NM

Patricia Blakely
Executive Director
The Merchants Fund
Philadelphia, PA

Doug Stamm
Chief Executive Officer
Meyer Memorial Trust
Portland, OR

R.T. Rybak
President and CEO
The Minneapolis Foundation
Minneapolis, MN

Terence P. Mulligan
President
Napa Valley Community Foundation
Napa, CA

Linda Milbourn
President and CEO
New Mexico Community Foundation
Santa Fe, NM

Maria Mottola
Executive Director
New York Foundation
New York, NY

Kevin F. Walker
President & CEO
Northwest Area Foundation
St. Paul, MN

Nichole Maher
President & CEO
Northwest Health Foundation
Portland, OR

Max Williams
President & CEO
The Oregon Community Foundation
Portland, OR

Marian Blankenship
Executive Director
PacificSource Foundation for Health Improvement
Springfield, OR

Jennifer Fleming DeVoll
President and CEO
Pasadena Community Foundation
Pasadena, CA

Chong Moua
Interim Executive Director
PFund Foundation
Minneapolis, MN

Pedro A. Ramos
President & CEO
The Philadelphia Foundation
Philadelphia, PA
Ann Marie Healy  
Executive Director  
Philadelphia Health Partnership  
Philadelphia, PA

Neil Steinberg  
President & CEO  
Rhode Island Foundation  
Providence, RI

Andrew Frishkoff  
Executive Director  
Philadelphia LISC  
Philadelphia, PA

David Hiller  
President and CEO  
Robert R. McCormick Foundation  
Chicago, IL

Maxwell King  
President and CEO  
The Pittsburgh Foundation  
Pittsburgh, PA

Timothy Silard  
President  
Rosenberg Foundation  
San Francisco, CA

Kashif Shaikh  
Executive Director  
Pillars Fund  
Chicago, IL

Alfred L. Castle  
Chief Executive Officer  
Samuel N. and Mary Castle Foundation  
Honolulu, HI

Gillian Darlow  
Chief Executive Officer  
Polk Bros. Foundation  
Chicago, IL

Sarah Martinez-Helfman  
President  
Samuel S. Fels Fund  
Philadelphia, PA

Susie Lee  
Executive Director  
Potomac Health Foundation  
Woodbridge, VA

Fred Blackwell  
Chief Executive Officer (CEO)  
The San Francisco Foundation  
San Francisco, CA

Kris A. Hermanns  
Chief Executive Officer  
Pride Foundation  
Seattle, WA

William Smith  
President and CEO  
Santa Fe Community Foundation  
Santa Fe, NM

Liz Powell  
Executive Director  
Racine Community Foundation  
Racine, WI

Christine Reeves Strigaro  
Executive Director  
The Sapelo Foundation  
Savannah, GA

Erin Kahn  
Executive Director  
Raikes Foundation  
Seattle, WA

Tony Mestres  
President and CEO  
Seattle Foundation  
Seattle, WA

Brenda R. Sharpe  
President and CEO  
REACH Healthcare Foundation  
Merriam, KS

Brian F. Boyd  
Executive Director  
Sequoia Foundation  
Tacoma, WA
Danielle Garbe
CEO
Sherwood Trust
Walla Walla, WA

Emmett D. Carson
CEO and President
Silicon Valley Community Foundation
Mountain View, CA

'Amanda Cloud
President & CEO
The Simmons Foundation
Houston, TX

Nancy L. Jacobs
Founder and President
Sundance Family Foundation
St. Paul, MN

Fo-Ching Lu
President
SYL Foundation
Seattle, WA

Allan Oliver
Executive Director
Thornburg Foundation
Santa Fe, NM

Taryn Higashi
Executive Director
Unbound Philanthropy
New York, NY

Pete Manzo
President & CEO
United Ways of California
South Pasadena, CA

Keith Thomajan
President & CEO
United Way of the Columbia-Willamette
Portland, OR

Carl Borg
Executive Director
United Way of Kitsap County
Bremerton, WA

Nancy L. Wiltse, MNA
Executive Director
van Löben Sels/RembeRock Foundation
San Francisco, CA

Irene Cooper-Basch
Executive Officer
Victoria Foundation
Newark, NJ

Jan T. Vilcek
Chairman and CEO
The Vilcek Foundation
New York, NY

Stacie Ma’a
President
Wallace Alexander Gerbode Foundation
San Francisco, CA

Sue Van
President & CEO
Wallace H. Coulter Foundation
Miami, FL

Fred Ali
President and CEO
Weingart Foundation
Los Angeles, CA

Peter Gonzales
President and CEO
Welcoming Center for New Pennsylvanians
Philadelphia, PA

Edward Kissam
Trustee
Werner-Kohnstamm Family Fund
San Francisco, CA

Mauri Ingram
President & CEO
Whatcom Community Foundation
Bellingham, WA

Larry Kramer
President
William and Flora Hewlett Foundation
Menlo Park, CA
Diane Cornman-Levy  
Executive Director  
WOMEN'S WAY  
Philadelphia, PA

Grace Hou  
President  
Woods Fund Chicago  
Chicago, IL

Bob Uyeki  
CEO  
Y & H Soda Foundation  
Moraga, CA

Merryh Snow Zegar  
Trustee and Executive Director  
Zegar Family Foundation  
New York, NY

Allison Magee  
Executive Director  
Zellerbach Family Foundation  
San Francisco, CA
From: Gary Bass <gbass@someemail.com>
Sent: Wednesday, March 21, 2018 7:34 PM
To: Walsh, Michael (Federal)
Subject: Citizenship Question on the 2020 Census

Dear Mr. Walsh,

I chair a collaborative of foundations and other grantmakers that have been working with the Census Bureau to support a fair and accurate census. Our primary focus aligns with the Census Bureau’s: to ensure that everyone is counted, only once, and in the right place. Doing so will reduce differential undercounts and produce a high quality and reliable census.

The attached letter to Secretary Ross from nearly 120 foundations from across the country urges the Secretary to oppose adding a question on citizenship to the 2020 census.

The letter represents local community foundations and large global foundations, that together contribute billions of dollars every year to support research, innovation, service delivery, advocacy and infrastructure in fields as diverse as education, the arts, technology, healthcare and human needs. But all agree that an accurate census is critical to the issues they care about, and that adding a citizenship question will undermine its accuracy.

We moved forward with this letter once we saw President Trump’s reelection campaign send a fundraising email calling for adding a census question on citizenship. We believe the census should never become a partisan issue. That is why we are not releasing our letter to the press or otherwise promoting it in public.
Foundations rarely like to function in the spotlight. We are not political organizations. In fact, it is quite unusual for foundation leaders to sign a letter like this. That makes it even more compelling that nearly 120 foundations – all with different interests – signed on in such a short period of time. If we had more time, I can assure you that the list of signatories would be even longer.

We will be following the outcome of this issue most closely. Most certainly it will affect our funding decisions going forward.

We would welcome the opportunity to discuss these concerns with you and Secretary Ross, and we are happy to share with you how we are supporting a fair and accurate census.

Since I do not have Secretary Ross’s email address, I would appreciate it if you would share the attached letter with him. Thank you for your consideration.

Sincerely,

Gary D. Bass  
Executive Director  
Bauman Foundation  
2040 S St., N.W.  
Washington, D.C. 20009
March 23, 2018

Mr. Gary D. Bass
Executive Director
Bauman Foundation
2040 S Street, NW, Suite 100
Washington, DC 20009

Dear Mr. Bass:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

Please assure your colleagues that the Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a complete and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I have conducted a rigorous review and produced a new 2020 Census lifecycle cost estimate, and I have put into place the people, processes, and programs necessary to ensure strong governance and oversight of the 2020 Census.

If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross
March 21, 2018

The Honorable Wilbur Ross
Secretary, United States Department of Commerce
1401 Constitution Avenue, N.W.
Washington, DC 20230

Dear Secretary Ross:

As the leader of Minnesota’s largest regional Chamber of Commerce, I am deeply concerned about the Department of Justice’s request that the Census Bureau include an untested question about citizenship in the 2020 Census questionnaire.

As you know, businesses rely on accurate, complete census data to analyze demographic and economic trends required for business strategy. Businesses use census data to determine where to locate stores and facilities, find qualified workers, and market products and services.

Adding a new question this late in the decennial Census process could reduce the accuracy of the 2020 Census. In addition, adding a new question would incur more delays and costs, and waste taxpayer dollars that have already been spent on designing and planning the 2020 Census.

We respectfully request that the Census Bureau refrain from adding any untested questions -- on citizenship or otherwise -- that could undermine the integrity of this critical data collection tool. We appreciate your leadership on this matter.

Thank you for your consideration.

Sincerely,

B Kyle
President and CEO
Saint Paul Area Chamber of Commerce
March 21, 2018

The Honorable Wilbur Ross
Secretary, United States Department of Commerce
1401 Constitution Avenue, N.W.
Washington, DC 20230

Re: Native American Concerns About Adding A Citizenship Question To The 2020 Census

Dear Secretary Ross:

We recently testified before the U.S. Senate Committee on Indian Affairs at its Oversight Hearing held on February 14, 2018 on “Making Indian Country Count: Native Americans and the 2020 Census.” We write to you today to share our concerns about the potential addition of a citizenship question to the 2020 decennial census form at this late date.

As we noted in our testimony, the failure to fully enumerate the American Indian and Alaska Native population could result in devastating consequences, including reductions in access to critical government services and resources. The Census Bureau’s work impacts tribes in many ways. It promotes our fair and equal participation in American democracy through a count to meet one person, one vote requirements. It provides data essential for research and planning purposes, which facilitates enforcement of federal non-discrimination laws. Census data is used to determine funding levels for federal programs that are vital to Native communities, including housing, healthcare and education.

Unfortunately, Native communities have been undercounted for decades. The Census Bureau estimates that in the most recent census, nearly five percent of Native people on reservations were missed, more than double the undercount rate of the next closest population group. In the 1990 Census, the net undercount for American Indians on reservations was more than 12 percent.

Historical distrust of the federal government often deters responses. One third of all Native Americans, 1.7 million people live in hard-to-count census tracts, including geographically isolated rural areas. Native Americans had the lowest census mail response rate in the 2015 National Content Test. The low response rate was exacerbated by the lack of traditional mailing addresses, a highly mobile population on tribal lands, and homelessness. Additional factors that contribute to Native people being hard-to-count are similar to those of other groups that experience undercounts, such as a very young population, poverty, low educational attainment, lack of telephone access, unemployment and linguistic isolation. In 2015, 38 percent of Native individuals on reservations were living in poverty, compared to 13 percent of the U.S. population. Over one quarter of all Native Americans are under 18 years of age, with a third of those below the poverty line. Young children are also undercounted at high rates, which is concerning because Native people living on tribal lands have a median age nine years lower than the national average. Language barriers and illiteracy are pervasive, especially among thousands of tribal elders in Alaska, Arizona and New Mexico.

The credibility of the Census Bureau is critical for public trust in the integrity of the 2020 Census, particularly among American Indians and Alaska Natives. Research on barriers and attitudes about the Census shows that Native people had the lowest intent to respond in the 2010 Census. Native people also did not believe responding would lead to any positive result in their community. Finding trusted messengers to address concerns among American Indians and Alaska Natives about the use and purpose of the census is vital to a successful 2020 count.
Considering these existing difficulties, the addition of a citizenship question to the 2020 census form, especially this close to 2020 Census, would jeopardize the responses of hard-to-count communities, including those in Indian Country. We are informed that immigrants and minority groups are currently fearful for the security and safety of their families posed by the possibility of including a question on citizenship, which could have a very negative impact on the accuracy of the 2020 Census count (as highlighted by the Census Bureau at the Fall 2017 meeting of its National Advisory Committee on Racial, Ethnic and Other Population).

We believe that a citizenship question would have a similar negative impact in Indian Country, resulting in an undercount of American Indians and Alaska Natives in 2020 that surpasses their high undercount in 2010. Because of the lengthy and complicated history of discrimination against indigenous peoples in this country, American Indians and Alaska Natives share a strong distrust of non-tribal governments. In a recent four-state study in Indian Country of attitudes towards non-tribal governments, the level of trust in the federal government ranged from a low of just five percent in South Dakota to a high of only 28 percent in Nevada. Native Americans continue to have much more trust in their own tribal governments than they do in any non-tribal governments. The inclusion of a citizenship question will add another layer to that distrust, making it more difficult to convince hard-to-count American Indians and Alaska Natives to participate in the census.

We all share the goal of ensuring a fair and accurate census. However, we fear the addition of a citizenship question would put the accuracy and fairness of the census in jeopardy. As you noted during the House Committee on Oversight and Government Reform’s October 12, 2017 hearing on the 2020 Census, requiring a new topic this late in the preparations for the census is irresponsible because robust testing for new questions in a contemporary, census-like environment is essential. Former Census Bureau Directors Robert Groves and Steven Murdock, directors who served under a Democratic and Republican Administration respectively, agree with your testimony, noting that “the scientific components of the census should not be undermined by the last-minute addition of untested questions (as is currently proposed by the U.S. Department of Justice)” in their recent joint editorial, “Science matters for the census” (http://science.sciencemag.org/content/359/6378/847). For all these reasons, we urge you to reject adding a citizenship question to the 2020 decennial form.

Sincerely,

Carol Gore
President and Chief Executive Officer
Cook Inlet Housing

Jefferson Keel
President
National Congress of American Indians

James T. Tucker
Pro Bono Voting Rights Counsel
Native American Rights Fund
Dear Secretary Ross:

Attached please find a letter from representatives of Alaska Native and American Indian organizations who recently testified before the Senate Committee on Indian Affairs at its Oversight Hearing entitled “Making Indian Country Count: Native Americans and the 2020 Census.” As explained in the letter, we respectfully urge you to reject the addition of a citizenship question to the 2020 Census form at this late date.

Please feel free to have your staff contact me if they have any questions.

Very truly yours,

James Tucker
Pro Bono Voting Rights Counsel
Native American Rights Fund
james.tucker@wilsonelser.com
(702) 727-1246

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For further information about Wilson, Elser, Moskowitz, Edelman & Dicker LLP, please see our website at www.wilsonelser.com or refer to any of our offices.

Thank you.
March 23, 2018

Ms. Carol Gore  
President and Chief Executive Officer  
Cook Inlet Housing  
3510 Spenard Road, Suite 100  
Anchorage, AK 99503  

Dear Ms. Gore:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a complete and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I have conducted a rigorous review and produced a new 2020 Census lifecycle cost estimate, and I have put into place the people, processes, and programs necessary to ensure strong governance and oversight of the 2020 Census.

If you have any additional questions or would like to discuss this matter further, please contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross
March 23, 2018

Mr. James T. Tucker
Pro Bono Voting Rights Counsel
Native American Rights Fund
1506 Broadway
Boulder, CO 80302-6296

Dear Mr. Tucker:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a complete and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I have conducted a rigorous review and produced a new 2020 Census lifecycle cost estimate, and I have put into place the people, processes, and programs necessary to ensure strong governance and oversight of the 2020 Census.

If you have any additional questions or would like to discuss this matter further, please contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross
March 23, 2018

Mr. Jefferson Keel  
President  
National Congress of American Indians  
Embassy of Tribal Nations  
1516 P Street, NW  
Washington, DC 20005  

Dear Mr. Keel:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a complete and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I have conducted a rigorous review and produced a new 2020 Census lifecycle cost estimate, and I have put into place the people, processes, and programs necessary to ensure strong governance and oversight of the 2020 Census.

If you have any additional questions or would like to discuss this matter further, please contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross
Dear Secretary Ross:

I urge you to reject any attempt to include a question regarding U.S. citizenship in the 2020 Decennial Census. Including such a question will lead to an increase in inaccurate responses and will depress response rates. As a state representative of New York City, I rely on accurate census data, and an inaccurate decennial census count will have a devastating impact on my ability to serve my constituents and ensure that they receive the resources they need.

The City of New York estimates that approximately 2.6 percent of its residents, or 225,000 people, were not counted in the 2010 Decennial Census. Administering the decennial census is already a challenge in New York City, which has a high percentage of communities that are deemed as “hard-to-count” by the Census Bureau: persons who do not speak English fluently, lower income persons, homeless persons, undocumented immigrants, young mobile people, children, etc. Recent qualitative data released by the Census Bureau shows that survey respondents have expressed “unprecedented” levels of concern with the confidentiality of their data and who has access to their responses regarding immigration. These concerns caused respondents to provide incorrect or incomplete information in an effort to protect themselves and their families. Adding a question about citizenship or immigration status to the 2020 Decennial Census will only exacerbate these existing challenges.

An undercount in the 2020 Decennial Census will have a devastating, decade-long impact on New York State and New York City. Data from the decennial census is used to allocate approximately $700 billion dollars to states and municipalities every fiscal year, and inaccuracies and depressed response rates in survey responses could easily lead to the misallocation of billions of dollars each fiscal year. It is my sincere hope that you will reject any attempt to add a question about citizenship to the 2020 Decennial Census. Doing so will result in depressed and inaccurate response rates, which could have a real and direct impact on the resources that New York City residents receive from the federal government over the next decade. Thank you for your consideration of this request.

Sincerely,

Dan Quart
Member of the New York State Assembly
March 21, 2018

The Honorable Wilbur L. Ross, Jr.,
Secretary
U.S. Department of Commerce
1401 Constitution Avenue, NW
Washington, D.C. 20230

Dear Secretary Ross:

I urge you to reject any attempt to include a question regarding U.S. citizenship in the 2020 Decennial Census. Including such a question will lead to an increase in inaccurate responses and will depress response rates. As a representative of New York City, I rely on accurate census data, an inaccurate decennial census count will have a devastating impact on my ability to serve my constituents and ensure that they receive the resources they need.

The City of New York estimates that approximately 2.6 percent of its residents, or 225,000 people, were not counted in the 2010 Decennial Census. Administering the decennial census is already a challenge in New York City, which has a high percentage of communities that are deemed “hard-to-count” by the Census Bureau: persons who do not speak English fluently, lower income persons, homeless persons, undocumented immigrants, young mobile persons, children, etc. Recent qualitative data released by the Census Bureau shows that survey respondents expressed “unprecedented” levels of concern with the confidentiality of their data and who has access to their responses regarding immigration. These concerns caused respondents to provide incorrect or incomplete information in an effort to protect themselves and their families. Adding a question about citizenship or immigration status to the 2020 Decennial Census will only exacerbate these existing challenges.

An undercount in the 2020 Decennial Census will have a devastating, decade-long impact on New York State and New York City. Data from the decennial census is used to allocate approximately $700 billion dollars to states and municipalities each fiscal year, and inaccuracies and depressed response rates in survey responses could easily lead to the misallocation of billions of dollars each fiscal year. It is my sincere hope that you will reject any attempt to add a question on citizenship to the 2020 Decennial Census. Doing so will result in depressed and inaccurate response rates, which could have a real and direct impact on the resources that New York City residents receive from the federal government over the next decade. Thank you for your consideration of this request.

Sincerely,

Helene E. Weinstein, Chair
NYS Assembly Ways & Means Committee

Room 923, Legislative Office Building, Albany, New York 12248, (518) 455-5462
3520 Nostrand Avenue, Brooklyn, New York 11229, (718) 648-4700
March 21, 2018

The Honorable Wilbur L. Ross, Jr.
Secretary
U.S. Department of Commerce
1401 Constitution Ave, NW
Washington, D.C. 20230

Dear Secretary Ross:

I urge you to reject any attempt to include a question regarding U.S. citizenship in the 2020 Decennial Census. Including such a question will lead to an increase in inaccurate responses and will depress response rates. As a New York State Assembly Member, I rely on accurate census data, and an inaccurate decennial census count will have a devastating impact on my ability to serve my constituents and ensure that they receive the resources they need.

The City of New York estimates that approximately 2.6 percent of its residents, or 225,000 people, were not counted in the 2010 Decennial Census. Administering the decennial census is already a challenge in New York City, which has a high percentage of communities that are deemed “hard-to-count” by the Census Bureau; persons who do not speak English fluently, lower income persons, homeless persons, undocumented immigrants, young mobile persons and children all constitute this group. The 11th Assembly District, which I represent, is comprised of many of these same folks. Recent qualitative data released by the Census Bureau shows that survey respondents expressed “unprecedented” levels of concern with the confidentiality of their data and who has access to their responses as it relates to immigration. These concerns resulted in respondents providing incorrect or incomplete information in an effort to protect themselves and their families. Adding a question about citizenship or immigration status to the 2020 Decennial Census will only exacerbate these existing challenges.

An undercount in the 2020 Decennial Census will have a devastating, decade-long impact on New York State and New York City. Data from the decennial census is used to allocate approximately $700 billion to states and municipalities each fiscal year, and inaccuracies and depressed response rates in survey responses could easily lead to the misallocation of billions of dollars each fiscal year. It is our sincere hope that you will reject any attempt to add a question on citizenship to the 2020 Decennial Census, which would have a real and direct impact on the resources that New York residents receive from the federal government over the next decade.

Thank you for your consideration of this request.

Sincerely,

Kimberly Jean-Pierre
Assemblywoman
11th Assembly District
March 22, 2018

The Honorable Secretary Wilbur Ross
U.S. Department of Commerce
1401 Constitution Avenue NW
Washington, DC 20230

Dear Secretary Ross:

We the undersigned legal organizations write to urge you to reject the Department of Justice’s request that you add a mandatory question to the 2020 Census asking all persons to divulge their citizenship status. A new, untested citizenship question would be an end-run around the Constitution’s text, history, and values. It cannot be squared with the federal government’s constitutional obligation to ensure a national count of all persons—regardless of where they are from or their immigration status.

Our Constitution establishes a democracy premised on the idea that all persons deserve equal representation in our government. To ensure a proper count of the nation’s population and a proper apportionment of representatives, the Constitution explicitly requires an “actual Enumeration” of the people, imposing on the federal government the duty to count the “whole number of persons in each State.” This critical constitutional language imposes a clear duty on the federal government: it must count all people living in the United States, whether they are citizens or non-citizens, whether they were born in the United States or in a distant part of the world. As the Constitution’s text and history dictate, the Constitution requires the federal government to count “the whole body of the people” without exception. It draws no distinction between citizens and non-citizens, but rather requires that the “whole immigrant population should be numbered with the people and counted as part of them.”

Adding the new citizenship question proposed by the Department of Justice would undermine the Census Bureau’s constitutional commitment to count all persons. It would also result in inaccurate data, thereby biasing congressional apportionment, redistricting, and funding decisions, for an entire decade, and producing harmful inequalities which would last even longer. Overwhelming evidence shows that this new question, if it becomes a part of the 2020 Census, will deter participation by immigrants across the country, who do not want an official record of their immigration status and fear that their responses will be used by the government to harm them and their families. The Census Bureau’s own data demonstrates “an unprecedented groundswell in confidentiality and data sharing concerns, particularly among immigrants or those who live with immigrants.” In the run up to the 2020 Census, “researchers heard respondents express new

1 U.S. Const. art. I, § 2, cl. 3; amend. XIV, § 2.
3 Id. at 432.
concerns about topics like the 'Muslim Ban,' discomfort 'registering' other household members by reporting their demographic characteristics, the dissolution of the 'DACA'... program, [and] repeated references to Immigration and Customs Enforcement." Adding a citizenship question to the 2020 Census—given the overwhelming evidence that it will chill participation and produce inaccurate responses—would break faith with the Constitution's mandate for a head count of the entire nation.

Although the Department of Justice urges the addition of a citizenship question to the 2020 Census, it offers no reason to doubt what the latest Census Bureau data shows: asking all persons to divulge their citizenship status will chill participation by noncitizens and citizens alike and produce inaccurate data. Instead, the DOJ maintains that a new citizenship question will ensure better enforcement of the Voting Rights Act. This is false. Since the passage of the Voting Rights Act in 1965, the Census has never asked all persons to report their citizenship. In other words, a mandatory question on citizenship has never been necessary to ensure robust protection of the right to vote. That is just as true now as it was in 1965 when the Voting Rights Act was passed.

The Justice Department's effort to game the Census and manipulate the national head count our Framers wrote into the Constitution should be rejected. Failing to count all persons in the United States, as the Constitution mandates, would deal a huge blow to our democracy. The stakes are high, and there are no do-overs permitted—we must get it right, and get it right now.

Sincerely,

Asian Americans Advancing Justice--AAJC
Campaign Legal Center
Constitutional Accountability Center
Democracy Forward
Lawyers' Committee for Civil Rights Under Law
NAACP Legal Defense and Education Fund, Inc.
United To Protect Democracy
Voting Rights Institute

cc: Donald F. McGahn, White House Counsel
Michael J. Walsh, Jr., Deputy General Counsel, Department of Commerce
Hon. Ron Johnson, Chairman, Senate Homeland Security and Governmental Affairs Committee
Hon. Claire McCaskill Ranking Member, Senate Homeland Security and Governmental Affairs Committee
Hon. Trey Gowdy Chairman, House Committee on Oversight and Government Reform
Hon. Elijah Cummings Ranking Member, House Committee on Oversight and Government Reform

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March 22, 2018

The Honorable Wilbur Ross
Secretary of Commerce
U.S. Department of Commerce
1401 Constitution Ave
NW Washington, DC 20230

Dear Secretary Ross,

On behalf of the Ames City Council, we are asking you to reject the Department of Justice’s (DOJ) request to add a new and untested citizenship question to the 2020 Census. As the home of Iowa State University, Ames hosts a large population of international students and their families. We know from previous census campaigns, that adding an untested question on citizenship would make our already difficult task of providing an accurate count far more challenging.

Our focus on including ALL students in the census is already a huge obstacle for Ames, and Iowa State University enrollment has undergone significant increases this past decade. Students from the Midwest often feel compelled to list their hometowns even though the Census Bureau has definitively stated each person must be counted in the city where he or she resides more than half the year. International students are extremely hesitant to fill out a census form despite the fact many of them will be living in our community for many years. Our bachelor’s and graduate degree programs can keep an international student in Ames for five years or more. Most of our international students are not citizens, but they need to be counted as part of our population.

While our international students tend to be fluent English speakers, they may bring spouses and family who are not. Language barriers can be compounded when questions of citizenship are introduced on forms. In Ames, our second most common language is Chinese. We appreciate that the Census Bureau provides forms in many languages, but we don’t have enough fluent speakers to help every international student understand that all people need to fill out a census form.

We believe the addition of an untested question on citizenship this late in the process would have a negative effect on participation and would drastically reduce the likelihood of an accurate count in our community. Ames is a city that has grown tremendously this past decade and our university enrollment increases is one of the driving factors. Please reject a census question on citizenship.

Sincerely,

John A. Haila, Mayor
Ames, Iowa
March 22, 2018

The Honorable Wilbur L. Ross Jr.
Secretary
United States Department of Commerce
1401 Constitution Ave, NW
Washington, D.C. 20230

Dear Secretary Ross:

Re: 2020 Decennial Census

I write to urge you to reject inclusion of a question regarding United States citizenship in the 2020 Decennial Census. I believe including such a question would ultimately be harmful to the aim of gathering the most accurate, reliable information possible – as you know, crucial for the 2020 Census and crucial for the government agencies and institutions that rely on Census data to make decisions. The follow-on consequences of inaccurate Census data would be felt by the over 300,000 Brooklynites I represent and millions more across our nation.

We already face a significant challenge in successfully obtaining the most accurate census data possible in 2020. The City of New York estimates that approximately 2.6% of residents, approximately 225,000 people, were not counted in the 2010 Decennial Census. Significant numbers of New York City populations are deemed “hard-to-count” by the Census Bureau. Reasons for this designation include: not speaking English fluently, low-income households, homeless populations, undocumented immigrants, young mobile people, etc. Qualitative data released by the Census Bureau finds an “unprecedented” level of concern with the confidentiality of data. Such concerns can cause respondents to provide inaccurate or incomplete information.

I join my colleagues in government who voice grave concerns that adding a question about citizenship or immigration status to the 2020 Decennial Census exacerbates the existing challenges and is thus seriously ill-advised.

Thank you for your attention to this important matter. If you have any questions or concerns regarding this letter, please do not hesitate to contact my office at (718) 284-4700.

Sincerely,

Jesse E. Hamilton
New York State Senator
20th District
March 22, 2018

The Honorable Wilbur Ross
Secretary, United States Department of Commerce
1401 Constitution Avenue, N.W.
Washington, DC 20230

Dear Secretary Ross:

As American business leaders, we write to express our deep concern about the Department of Justice’s request that the Census Bureau include an untested question about citizenship in the 2020 Census questionnaire.

The decennial Census provides critical data that informs decision-making in both the private and public sectors. As you know, businesses rely on accurate, complete census data to analyze demographic and economic trends required for business strategy. Businesses use census data to determine where to locate stores and facilities, find qualified workers, and market products and services.

Adding a new question this late in the decennial Census process could reduce the accuracy of the 2020 Census. We know from the science of survey design that adding questions to an established questionnaire essentially creates a new questionnaire that needs to be validated. Every question and the order of questions affect how respondents answer the other questions. When a change is made to a standardized questionnaire that has already been tested, the reliability and validity of the questionnaire are potentially affected, requiring the survey to be re-tested.

Adding a new question would incur additional delays and costs, and waste taxpayer dollars that have already been spent on designing and planning the 2020 Census. The Census Bureau has completed its multi-year, multi-million-dollar research and testing phase for the 2020 Census, and its end-to-end test in Rhode Island is underway. And the schedule is already tight. Instead of spending more money and time on altering the questionnaire, additional taxpayer dollars would be better directed to addressing ongoing challenges around deploying mobile technology that will yield a more accurate Census.

We appreciate your leadership and are pleased that the Census Bureau is utilizing your business acumen to execute the nation’s most comprehensive population count. We respectfully request that the Census Bureau refrain from adding any untested questions -- on citizenship or otherwise -- that could undermine the integrity of this critical data collection tool.

Thank you for your consideration.
Sincerely,

Karen Blanco
Co-Founder & Director
Ejecutiva Magazine

Roy Bostock
Vice-Chairman (retired),
Delta AirLines; Chairman
(retired), Yahoo; Director
(retired), Morgan Stanley

Irene B. Bueno
Partner
NVG LLC

Carl Camden
President & CEO (retired)
Kelly Services

Maxine Clark
Founder, Build-A-Bear
Workshop; CEO, Clark-Fox
Family Foundation

Billy Dec
Founder
Elston Films

H. Patrick Dee
Managing Director
U.S. Bank Wealth Management

Barry Downing
President & CEO
Northrock, Inc.

Robert Dugger
Founder & Managing Partner,
Hanover Provident Capital;
Partner (retired), Paul Tudor
Jones; Chairman of the National
Advisory Board, ReadyNation

Elizabeth Fullerton
General Partner
Fullerton Venture Partners

Buck Gee
Vice President &
General Manager (retired)
Cisco Systems

Nikolai Gregory Galle
CEO
Future Partners, LLC

Eduardo Hapke
Co-Founder & Publisher
Negocios Magazine

Richard Hazleton
Chairman & CEO (retired)
Dow Corning Corporation

Jimmy Lee
President & CEO
Goodcity

Chris Lehane
Global Head of Public Policy &
Public Affairs
Airbnb

Ginger Lew
CEO, Three Oaks Investments,
LLC; Former General Counsel,
U.S. Department of Commerce

Dennis Linderbaum
President & COO
UnityPoint Health Des Moines
Foundation

Lukas Lipinski
Founding Partner
The Policy Bridge

Gary F. Locke
Chairman, Locke Global
Strategies, LLC; Former
Secretary, U.S. Department of
Commerce

Helmuth A. Lutty
Senior Vice President –
Shipping Operations
Del Monte Fresh
Produce N.A., Inc.
Note: Signatories named above sign as individuals. Organization or company names are included for identification purposes only, and do not imply company endorsement.

ReadyNation is a national business membership organization of business executives who promote policy solutions that build a strong workforce and economy.
March 23, 2018

Ms. Jill Boxler
Senior National Policy Advisor
Ready Nation, Council for a Strong America
1212 New York Avenue, NW, Suite 300
Washington, DC 20005

Dear Ms. Boxler:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a complete and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I have conducted a rigorous review and produced a new 2020 Census lifecycle cost estimate, and I have put into place the people, processes, and programs necessary to ensure strong governance and oversight of the 2020 Census.

If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross

Wilbur Ross
As part of his decision-making process, Secretary Ross spoke to a number of different stakeholders about the Department of Justice’s request to reinstate the citizenship question on the 2020 Decennial. These notes attempt to memorialize those conversations. These are not verbatim transcripts and each summary reflects the recollections of attendees from the Department of Commerce. Every effort has been made to ensure these notes are an accurate reflection of Secretary Ross’s conversations with stakeholders.

Congressman Elijah Cummings (D. MD)

On March 23, 2018, Secretary Ross and his staff spoke with Congressman Elijah Cummings. Congressman Cummings stated that he is vehemently against adding a citizenship question to the 2020 Decennial Census. He noted that in his district—the inner city of Baltimore—a number of people are already skeptical of the federal government and adding a citizenship question would chill response rates because of concerns about confidentiality. Congressman Cummings stated that this chilling effect would be significant because the census is asking something that it has never done before. He further stated that this (presumably using data from the Decennial Census to enforce the VRA) is not the way DOJ does it. Congressman Cummings noted that the inclusion of a citizenship question would cost the government more money because people would be hesitant to get involved because they will not want to give their information to the government. Congressman Cummings noted that even in his inner-city district in Baltimore, lots of people in his neighborhood do not want to get involved because they will not want to give their information to the government. Congressman Cummings further noted that it’s getting late in the process and the Secretary probably has a lot on his plate. When asked about issues unique to his district, Congressman Cummings noted that 10% of his district was Hispanic or other immigrant populations and that they are concerned like they have never been before. Congressman Cummings noted that the president’s policies have scared people in his district and the government has become the enemy instead of lifting people up. Congressman Cummings stated that when he goes to church, he can’t leave without constituents expressing their concerns about how they are scared to death overall.

Congressman Cummings noted that the administration has the right to carry out its own policies but that doing so has ramifications. Finally, Congressman Cummings noted that African Americans are very skeptical of the Census Bureau generally and less inclined to respond. In response to a question, Congressman Cummings confirmed that this skepticism existed separate from and regardless of the question on citizenship.

- Government mistrust
- Confidentiality concerns
- Question has never been asked before
- Higher costs
- Bad political climate
As part of his decision-making process, Secretary Ross spoke to a number of different stakeholders about the Department of Justice’s request to reinstate the citizenship question on the 2020 Decennial. These notes attempt to memorialize those conversations. These are not verbatim transcripts and each summary reflects the recollections of attendees from the Department of Commerce. Every effort has been made to ensure these notes are an accurate reflection of Secretary Ross’s conversations with stakeholders.

Professor Bob Groves, former Director of the Census (2009-2012)

On March 23, 2018, Secretary Ross and his staff spoke with Professor Bob Groves, director of the Census Bureau from 2009 to 2012. Dr. Groves noted that the Commerce Secretary in 2009 was in precisely the same situation that the Secretary is now – attempting to implement changes to the census questionnaire in a justifiable way. Professor Groves stated that there was a scholar from the University of Michigan who worked on VRA issues and who combined estimates from the Decennial Census and the ACS to evaluate the quality of data for enforcement of the VRA. Professor Groves noted that the VRA calls for data on language proficiency but there is not a question about language proficiency on the census. Professor Groves stated that the results were proven out of necessity to their satisfaction and that the Census Bureau developed a set of techniques to provide estimates on citizenship status without adding a citizenship question to the decennial questionnaire.

Professor Groves next discussed the protocol for the development of questions for the census. He stated that making last minute changes to the census without testing is risky, but he conceded that no one has estimates of that risk, so he cannot quantify it. He believes that the argument that making last minutes changes is risky is a valid one. Professor Groves also stated that the Secretary should consider how badly the Census Bureau would be damaged by the addition of a question. Professor Groves noted that adding questions to the decennial questionnaire creates a non-trivial risk, but that again there is no empirical evidence to support this proposition. Professor Groves stated that he believed the top priority when considering whether to add a question to the decennial census questionnaire is whether that question is required by law or necessary to guarantee that the census is properly done. Professor Groves stated that the questions that are legally required are the highest priority. In response to a question, Dr. Groves clarified the types of questions that are legally required. He referenced existing laws that require the dispersal of funds based on census data as well as laws that require certain census data to be implemented. Professor Groves noted that some laws specifically reference the use of census data while others merely imply as much.

Finally, Professor Groves discussed the issue of “speculation” about participation rates. Professor Groves stated that based on his past experience, in the year before the census interest groups will begin raising concerns about the intrusiveness of the Census Bureau into the lives of the public. He stated that interest groups will encourage people to refuse to participate in the census. Professor Groves noted that new immigrant groups are often susceptible to influence by these campaigns, which he claimed occurred regularly in years ending with the number 9. Professor Groves made clear that these campaigns would occur in 2019 regardless of whether or not the 2020 Decennial Census contains a citizenship question. Professor Groves noted that the
Secretary and the Census Bureau would have to find ways to counter such campaigns so that his census is not ruined. Professor Groves stated that he engaged in this exercise to support his Secretary in response to a campaign against participation from Michelle Bachman in 2009. Professor Groves then thanked the Secretary for the time and attention he was giving the issue and lamenting that there is no upside for the Secretary of Commerce during a Decennial Census year. Secretaries are not praised if the census goes well – only criticized when it goes poorly. Professor Groves cautioned that the Secretary could “only lose” with the census and wished him luck.

- ACS data is sufficient
- Testing
- No empirical evidence of risk exists
- Government mistrust
- Interest groups will attempt to decrease participation regardless of content
As part of his decision-making process, Secretary Ross spoke to a number of different stakeholders about the Department of Justice’s request to reinstate the citizenship question on the 2020 Decennial. These notes attempt to memorialize those conversations. These are not verbatim transcripts and each summary reflects the recollections of attendees from the Department of Commerce. Every effort has been made to ensure these notes are an accurate reflection of Secretary Ross’s conversations with stakeholders.

Hermann Habermann, former Deputy Director and COO of the Census Bureau (2002-2006)

On March 23, 2018, Secretary Ross and his staff spoke with Hermann Habermann, former Deputy Director and COO of the Census Bureau, former Director of the U.N. Statistical Division, and former Chief Statistician at OMB. Mr. Habermann stated that he was not aware of a controlled study that could quantify the effect on participation rates of asking a citizenship question. Mr. Habermann stated that he believed that asking a citizenship question on the Decennial Census would diminish response rates and degrade the quality of responses, but there is no data to support these beliefs or to quantify the expected response diminution rate. Mr. Habermann stated that he believed the “burden of proof” for getting a question added to the Decennial Census is on the person who proposes it. Specifically, the proposing party should be required to demonstrate how the proposed question would not degrade the census. Mr. Habermann stated that the census is fragile, and that it is particularly fragile now because our country is divided and people are influenced by social media, which can be a powerfully disrupting force. Mr. Habermann continued that social media makes it much easier to galvanize mistrust about the census by questioning its very purpose. Mr. Habermann stated that lower response rates cause the costs of the census to go up and the quality of the data to go down.

Mr. Habermann shared an example from his time at Census Bureau. In 2004, DHS asked the Census Bureau to provide data on the number of Arab Americans by zip code in certain areas of the country. Mr. Habermann noted that this information was already available to the public but DHS could not figure out how to access it. When the Census Bureau provided DHS with the information it requested, there was a political firestorm and the Census Bureau was accused of providing DHS with sensitive information. (Mr. Habermann made clear that the Census Bureau does not give out personally identifiable information and did not do so here, but the result was the same.) Mr. Habermann noted that despite the outcry, the response rate to subsequent census surveys did not change in the communities most impacted by the dissemination of the supposedly sensitive information. Mr. Habermann confirmed that he ascertained this personally, but also cautioned that we are living in a different time now and the political climate is different.

Mr. Habermann stated that he believed that reinstating a citizenship question would cause divisiveness and that the party requesting the addition should have the burden of proof to establish the overriding policy reason for the addition. Mr. Habermann further stated that if the Secretary wants to add the question, the reason must be clear – there must be no public mistrust of the underlying reason, which is not the case here. Mr. Habermann noted that this proposed citizenship question would be particularly fraught because there has not been a clear explanation given as to why this data is necessary. Therefore, it is easy to misconstrue the motives behind the question. Finally, Mr. Habermann noted that if a proposed question would not decrease cost,
serve an important policy objective, or increase data quality, there is no reason to put it on the questionnaire.

- Lower response rate
- Degrade quality of responses
- Burden of proof on proposing party
- Country divided
- Higher costs
As part of his decision-making process, Secretary Ross spoke to a number of different stakeholders about the Department of Justice’s request to reinstate the citizenship question on the 2020 Decennial. These notes attempt to memorialize those conversations. These are not verbatim transcripts and each summary reflects the recollections of attendees from the Department of Commerce. Every effort has been made to ensure these notes are an accurate reflection of Secretary Ross’s conversations with stakeholders.

Dr. Kay Cole James, President, Heritage Foundation

On March 23, 2018, Secretary Ross and his staff spoke with Dr. Kay Cole James, President of the Heritage Foundation. Dr. James complimented the Secretary on remarks he made at the Swedish embassy. Dr. James stated that it is vitally important to have accurate data on citizenship status of U.S. residents and that she supports adding a citizenship question to the Decennial Census. Dr. James stated that the Heritage Foundation, as a policy and research institution, uses census data in numerous ways, and Heritage counts on census data to be a reliable source of data. She stated that she considered census data to be the most reliable source of data that Heritage used. Dr. James stated that Heritage policy analysts used census data across the board and that the accuracy of census data is important because it determines the quality of Heritage’s work product. Dr. James stated that a citizenship question would allow Heritage and other research organizations to know the full cohort of what researchers are dealing with in terms of citizenship. The data could allow analysts to better understand whether opinions are held by the general public, citizens specifically, or a mix of citizens and non-citizens. More data on citizenship would allow more in-depth research and better breakdowns of data cohorts. In response to a question, Dr. James stated that she had no insight into the commercial uses of census data. Dr. James next stated that citizenship data would be vitally important for research on issues of voting rights. She explained that it was hard to predict how having more accurate citizenship data would specifically impact VRA enforcement, but that Heritage analysts will eventually be able to review the new data, analyze it, and produce more accurate reports. Dr. James next noted that accurate citizenship data could improve research into important immigration issues. She noted that in this area in particular it is critical for researchers to have access to accurate data on citizenship status. In conclusion, Dr. James reiterated that she was extremely supportive of the reinstatement of the citizenship question on the Decennial Census.

- Need accurate citizenship data
- Improved research
March 23, 2018

Honorable Wilbur L. Ross, Jr.
Secretary
U.S. Department of Commerce
14021 Constitution Avenue, NW
Washington, D.C. 20230

Dear Secretary Ross:

I write to urge you to reject any attempt to include a question on citizenship status in the 2020 Decennial Census. As a representative of a diverse community in New York that is home to a large population of immigrants, I am deeply concerned that a citizenship question would deter many of my constituents from participating in the census and prevent them from receiving critically needed resources over the next decade.

In the district I represent, approximately 90% of residents currently live in neighborhoods considered "hard-to-count" by the Census Bureau, and only 68.4% of households returned their questionnaires in the 2010 Decennial Census. With heightened fears of immigration enforcement and anxieties over the confidentiality of census data, it will be even more challenging to collect and complete, accurate information. Adding a question about citizenship will exacerbate these issues and depress response rates even further, leading to detrimental consequences for our most vulnerable populations.

It is critical that the 2020 Decennial Census captures accurate data so our communities can be fairly represented and federal funding can be properly allocated. The inclusion of an immigration status question would undermine the validity of census data and hinder efforts to provide vital services to people in need. The long-term effects of an undercount would be devastating for families in my community and throughout New York, and I strongly urge you to reject requests to add a citizenship question that would cause depressed and inaccurate responses. Thank you in advance for your consideration.

Sincerely,

Aravella Simotas
New York State Assemblymember
36th District – Queens
March 23, 2018

Hon. Wilbur L. Ross, Jr.
Secretary
US. Department of Commerce
1401 Constitution Avenue, NW
Washington, D.C. 20230

Dear Secretary Ross:

I am asking you to reject any attempt to include any questioning regarding U.S. citizenship in the 2020 Decennial Census. The presence of such a question will lead to an increase in inaccurate responses and will suppress response rates. An inaccurate decennial census count will have a devastating impact on my ability as an elected official to serve my constituents and ensure they received the proper resources.

I represent a number of impacted minority communities that are deemed “hard-to-count” by the Census Bureau: persons who do not speak English fluently, lower income people, undocumented immigrants, children, etc. Recent qualitative data released by the Census Bureau shows that survey respondents expressed “unprecedented” levels of concern with the confidentiality of their data and who has access to their responses regarding immigration. These concerns caused respondents to provide incorrect or incomplete information in an effort to protect themselves and their families. Adding a question about citizenship or immigration status to the 2020 Decennial Census will only exacerbate these existing challenges.

An undercount in the 2020 Decennial Census will have a devastating, decade-long impact on New York State. Data from the decennial census is used to allocate approximately $700 billion dollars to states and municipalities each fiscal year and inaccuracies and depressed responses could easily lead to a misallocation in the billions.

Thank you for your consideration of this request.

Sincerely,

Charles D. Lavine
Member of Assembly

ALBANY OFFICE: Room 713, Legislative Office Building, Albany, New York 12248 • 518-455-5456, FAX: 518-455-5467
DISTRICT OFFICE: 1 School Street, Suite 203B, Glen Cove, New York 11542 • 516-676-0050, FAX: 516-676-0071
EMAIL: lavinec@nyassembly.gov
March 23, 2018

Wilbur L. Ross, Jr., Secretary
US Department of Commerce
1401 Constitution Ave, NW
Washington D.C., 20230

Dear Secretary Ross,

I urge you to reject any attempt to include any question regarding U.S. citizenship and immigration status in the 2020 Decennial Census. Asking for such information would have a chilling effect on the Census completion rate. The United States Census Bureau states that the goal of the Census is to serve “as the leading source of quality data about the nation’s people and economy.” Implementing questions about citizenship would undermine this goal.

Many New Yorkers, such as people who are homeless, lack of proficiency with the English language, or fear federal action due to their race, ethnicity, or immigration status are deemed “hard to count” populations for Census collection. These groups will be further deterred from participating in the Census if there are questions regarding citizenship and immigration status. The majority of the people who will be discouraged from participating in the Census, are also those who would benefit greatly from a precise and fair allocation of resources. Individuals and families alike are rightfully concerned with how their data will be used and with whom it will be shared. Low participation in the Census can lead to significantly underfunding from the Federal government for the next decade.

In order for elected officials to best serve our constituents, we need to ensure that we obtain the most accurate information possible while remaining aware of the delicacies that exist in our constituents’ lives. Adding additional barriers or causes for lack of participation in the survey will only serve to further undermine funding for services for our most vulnerable populations.

I urge you to allow the Census to be as accessible as possible, and reject questions regarding citizenship or immigration status. Thank you for your attention to this matter.

Sincerely,

Deborah J. Glick
Assemblymember
Dear Secretary Ross:

We urge you to reject any attempt to include a question regarding U.S. citizenship in the 2020 Decennial Census. Including such a question will lead to an increase in inaccurate responses and will depress response rates. As representative of New York City, we rely on accurate census data, and an inaccurate decennial census count will have a devastating impact on our ability to serve our constituents and ensure that they receive the resources they need.

The City of New York estimates that approximately 2.6 percent of its residents, or 225,000 people, were not counted in the 2010 Decennial Census. Administering the decennial census is already a challenge in New York City, which has a high percentage of communities that are deemed “hard to count” by the Census Bureau; persons who do not speak English fluently, lower income persons, homeless persons, undocumented immigrants, young mobile persons, children, etc. Recent qualitative data released by the Census Bureau shows that survey respondents expressed “unprecedented” levels of concern with the confidentiality of their data and who has access to their responses regarding immigration. These concerns caused respondents to provide incorrect or incomplete information in an effort to protect themselves and their families. Adding a question about citizenship or immigration status to the 2020 Decennial Census will only exacerbate these existing challenges.

An undercount in the 2020 Decennial Census will have a devastating, decade-long impact on New York State and New York City. Data from the decennial census is used to allocate approximately $700 billion dollars to states and municipalities each fiscal year, and inaccuracies and depressed response rates in survey responses could easily lead to the misallocation of billions of dollars each fiscal year. It is our sincere hope that you will reject any attempt to add a question on citizenship to the 2020 Decennial Census. Doing so will result in depressed and inaccurate rates, which could have a real and direct impact on the resources that New York City residents receive from the federal government over the next decade. Thank you for the consideration of this request.

Sincerely,

David I. Weprin
Member of Assembly
March 23, 2018

The Honorable Wilbur L. Ross, Jr.
Secretary
U.S. Department of Commerce
1401 Constitution Ave, NW
Washington, D.C. 20230

Dear Secretary Ross:

I urge you to reject any attempt to include a question regarding U.S. citizenship in the 2020 Decennial Census. Including such a question will discourage people worried about their citizenship status from responding to the census at all. As a member of the New York State Assembly, I am deeply concerned about an inaccurate count and the resulting inaccuracies in the distribution of state and federal resources based on that count.

Naturally, many people are concerned about the confidentiality of their personal information, and this is especially true amongst many of New York City’s immigrant populations. These concerns cause respondents to provide incorrect or incomplete information in an effort to protect themselves and their families.

New York City is home to many different groups of people, some of which are inherently hard to count by the Census Bureau’s own standards: non-fluent English speakers; people of low income, the homeless; undocumented immigrants; and young, transient professionals. One estimate of the 2010 Census shared with my office by MC Meng, MC Serrano and MC Maloney suggests that 225,000 New Yorkers were not counted that year. That is more people than live in most American cities, and that is a miscount that I want to avoid repeating.

Thank you for considering my request.

Sincerely,

Joseph R. Lentol
March 23, 2018

Honorable William Ross
Secretary
U.S. Department of Commerce
1401 Constitution Ave, NW
Washington, DC 20230

Dear Secretary Ross:

I am writing to you regarding the upcoming 2020 Decennial Census and the proposal that would include a question of citizenship on the questionnaire. As an Assemblyman from Brooklyn, New York that represents a majority Asian-American district, it is crucial that we do all we can to ensure an accurate count. I urge you to reject any attempt to include a question regarding U.S. citizenship in the 2020 Decennial Census.

New York City has been chronically undercounted in the past censuses which have had a decade long impact. Since the five-boroughs has many obstacles for getting an accurate count, such as homeless, undocumented, non-English speakers as well as many other challenges that depress turnout. Ensuring that New York residents receive the accurate and appropriate amount of federal government funding should be a top priority.

Thank you in advance for your consideration of this matter and I hope that you will join me and many of my colleagues in government to make sure that we receive the resources we need and an accurate count in the census.

Sincerely,

Peter J. Abbate, Jr.
Member of Assembly
March 23, 2018

Hon. Wilbur L. Ross, Jr.
Secretary
U.S. Dept. of Commerce
1401 Constitution Ave. NW
Washington D.C. 20230

Dear Secretary Ross:

I write to urge you to reject any proposal to include questions regarding U.S. citizenship in the 2020 Decennial Census. Any inclusion of such a question will lead to depressed response rates and inaccurate data. As a representative in Central New York, I rely on accurate data to better serve my constituents and determine what resources they need.

As the representative of one of the most impoverished communities in the county, census data will already be challenging to collect in my district. Constituents are already concerned about keeping their data secure and questioning them about citizenship will sew an even greater distrust of the federal government in our country. Immigrants will conceal information to protect their families rendering the data inaccurate, incomplete, and ultimately less useful.

Additionally, if an undercount occurs, New York will suffer a major blow to its funding allocation. This is a disservice to my constituents and the State of New York as a whole. We should not tolerate a decade of misallocated resources because of ill advised questions in the 2020 Decennial Census.

I hope that you see the counterproductive nature of any citizenship question inclusion and reject such proposals. Thank you for your consideration of this request.

Sincerely,

Pamela J. Hunter
Assemblywoman Pamela J. Hunter
128th Assembly District
March 23, 2018

The Honorable Wilbur Ross
Secretary, United States Department of Commerce
1401 Constitution Avenue, N.W.
Washington, DC 20230

Re: Protect the Scientific Integrity of the Census

Dear Secretary Ross,

Since its inception in 1787, the decennial U.S. Census has served as the scientific foundation for population-based representation in our democracy, in addition to providing a wealth of social and economic data that serves the entire country. As we approach the 2020 Census, changes in data collection are being proposed at this late stage that threaten to undermine the scientific integrity of this crucial enterprise.

Last December, the Department of Justice requested that the Census Bureau add a question regarding citizenship in an effort to identify undocumented immigrant populations. This request is ill-conceived for a number of reasons. We have more accurate methods for measuring and studying non-citizenship, for example through anonymous surveys. Imposing a citizenship question would lead to a lower participation rate and substantial undercount of certain geographic regions and demographic populations, undermining the scientific integrity of the entire project.

Preliminary focus groups and interviews with Census field representatives have already shown that greater fears of deportation, threats of a “Muslim ban,” and the termination of the DACA program are exacerbating already high non-response rates among historically undercounted populations. The potential for an increased undercount would have far reaching consequences.

In addition to the possible loss of Congressional seats for states, accurate population counts are essential for commerce. Businesses that depend on sales to individual consumers rely on regional information about the age, income, education, family structure, occupations and commuting patterns of people that determine market segmentations. Additionally, behavioral data about the use of household accessories and technology provide the best picture that we have about how Americans live. Without a high participation rate and accurate interviews, the validity of important economic data is threatened.

The accuracy of the Census is also crucial for effective public policy. Not only do we rely on accurate Census data to provide public services like schools, health care centers and highways, demographic information from the Census has played a major role in the protection of our most fundamental freedoms. The accurate classification of specific racial and ethnic populations provides the core evidence that facilitates enforcement of both the Civil Rights Act and the Voting Rights Act.

Recent calls to remove or abruptly transform these questions similarly threaten the scientific integrity of the Census. Traditionally, the Census Bureau has led a continuous effort to refine and improve questions designed to measure evolving constructs such as race. For example, the 2000 Census was the first to provide the option of self-identification in multiple categories, to better reflect the growing
complexity of racial identity. Our hope is that demographers and other scientists at the Bureau will continue to adjust such questions in order to capture meaningful distinctions, but they should be free from political pressure in doing so.

The Census captures the story of who we have been, who we are, and who we are becoming. We urge the Department of Commerce uphold its responsibility to protect the scientific integrity and ensure the accuracy of the population data that results from the 2020 Census.

Sincerely,

Steven Aftergood
Acting President, Federation of American Scientists

Andrew Cherlin
Benjamin H. Griswold III Professor of Public Policy & Chair, Johns Hopkins University

Sarah Christopherson
Policy Advocacy Director, National Women's Health Network

Louis Clark
Executive Director/CEO, Government Accountability Project

Charlie Cray
Interim Political and Business Policy Director, Greenpeace USA

Julie Dowling
Associate Professor, Department of Latina/Latino Studies, University of Illinois at Urbana-Champaign

Wendy Fields
Executive Director, Democracy Initiative

Carol Gore
President/CEO, Cook Inlet Housing Authority
President, Association of Alaska Housing Authorities

Christine Harley
Director, 2020 Census Counts

Hassan Jaber
Executive Director, Arab Community Center for Economic and Social Services

David Lewis
William R. Kenan, Jr. Professor and Chair of the Department of Political Science, Vanderbilt University

Meghan Maury
Policy Director, National LGBTQ Task Force
Alondra Nelson  
President, Social Science Research Council

Andrew Rosenberg  
Director, Center for Science and Democracy, Union of Concerned Scientists

Alisú Schoua-Glusberg  
Principal Owner, Research Support Services Inc.

Sonal Shah  
Professor of Practice and founding Executive Director of the Beeck Center for Social Impact and Innovation, Georgetown University

Maile Tualii  
Assistant Professor of Public Health, John A. Burns School of Medicine, University of Hawaii, Manoa

Kathleen Thelen  
President, American Political Science Association

Arturo Vargas  
Executive Director, NALEO Educational Fund

Bethany Wiggin  
Founding Director, Penn Program in Environmental Humanities, University of Pennsylvania

Susan F. Wood  
Executive Director, Jacobs Institute of Women’s Health

Jane Zelikova  
Research Scientist, 500 Women Scientists
March 23, 2018

Ms. Vivian Chang  
Outreach Specialist, Center for Science and Democracy  
Union of Concerned Scientists  
1825 K Street, NW, Suite 800  
Washington, DC 20006

Dear Ms. Chang:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

Please assure your colleagues that the Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a complete and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I have conducted a rigorous review and produced a new 2020 Census lifecycle cost estimate, and I have put into place the people, processes, and programs necessary to ensure strong governance and oversight of the 2020 Census.

If you have any additional questions or would like to discuss this matter further, please have a member of your staff contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross
March 23, 2018

Mr. Marvin D. Nathan  
National Chair  
Anti-Defamation League  
1100 Connecticut Avenue, NW, Number 1020  
Washington, DC 20036  

Dear Mr. Nathan:

Thank you for your recent letter regarding the Department of Justice’s request to add a citizenship question to the 2020 Census questionnaire. I appreciate your taking the time to make me aware of your position on this important matter.

The Department of Commerce is conducting an orderly review of the Department of Justice’s request. The Department is required by law to submit the proposed final list of questions to Congress by March 31, 2018, which is two years prior to Census Day, April 1, 2020.

Let me underscore my commitment to conduct a complete and accurate 2020 Census. A high-quality 2020 Census that counts each person, in the place where he or she lives, is my highest priority. As you know, I have conducted a rigorous review and produced a new 2020 Census lifecycle cost estimate, and I have put into place the people, processes, and programs necessary to ensure strong governance and oversight of the 2020 Census.

We will keep you apprised of any developments regarding the citizenship question. If you have any additional questions or would like to discuss this matter further, please contact Michael Platt, Jr., Assistant Secretary for Legislative and Intergovernmental Affairs, at mplatt@doc.gov or (202) 482-3663.

Sincerely,

Wilbur Ross
As part of his decision-making process, Secretary Ross spoke to a number of different stakeholders about the Department of Justice’s request to reinstate the citizenship question on the 2020 Decennial. These notes attempt to memorialize those conversations. These are not verbatim transcripts and each summary reflects the recollections of attendees from the Department of Commerce. Every effort has been made to ensure these notes are an accurate reflection of Secretary Ross’s conversations with stakeholders.

Minority Leader Nancy Pelosi (D. CA)

On March 23, 2018, Secretary Ross and his staff spoke with House Minority Leader Nancy Pelosi. The Secretary and Leader Pelosi briefly discussed trade and the recent 232 actions. Leader Pelosi then stated that she hoped that she and the Secretary could find “common ground” on census issues and the issue surrounding reinstatement of the citizenship question on the Decennial Census. Leader Pelosi stated that she thinks it would be wrong to add a citizenship question to the 2020 Decennial Census because it is not in the public interest and it does not honor the vision of the founders to meet the needs of the people. Leader Pelosi noted that the census was really about reapportionment and to measure needs and opportunities. According to Leader Pelosi, the census is about how many people live in the United States. Determining the citizenship of residents is not part of the intention of the founders. Leader Pelosi stated that the addition of a citizenship question would (1) have a chilling effect; (2) have an impact on federal government programs and benefits; and (3) impact the distribution of votes in Congress.

Leader Pelosi shared that some unease has arisen out of the Trump campaign’s fundraising email that was sent out earlier in the week regarding the citizenship question. She expressed her appreciation that when asked about this email before the House CJS Committee on Tuesday, the Secretary testified that the census is not about politics. Leader Pelosi noted that the citizenship question is about some borderline stuff at best and at worst, it undermines the basis of our democracy, which is to meet the needs of and be fair to the states. Leader Pelosi stated that she appreciated the fact that the Secretary must make a decision by March 31 and that he is reaching out to various sides.

Leader Pelosi noted that she was blessed to be from California, where the beauty is in the mix, and where there are a number of mixed households and a large population of non-citizens or non-U.S. born individuals. She stated her concern that residents of mixed households may be reluctant to even cooperate with the census if the short form decennial contains a citizenship question. Leader Pelosi noted that the mere flirtation with adding a question has a chilling effect on people who are citizens and people who are not citizens. Leader Pelosi noted that the census is used to make judgments about the formula for how opportunities are distributed relative to the population. Leader Pelosi stated that a diminished count (which was not yet established by evidence or facts) would lead to a decrease in resources and opportunity from the federal government.

Leader Pelosi then discussed her time as a student answering questions about the diplomatic policy of the United States in the nineteenth century, all of which were based on geography, particularly those about Lewis and Clark. Leader Pelosi stated that questions of history are often
answered by knowing “who are the people?” She spoke of how Ben Franklin feared that America would become a nation of Germans. Leader Pelosi stated that currently, our country consists of natives and others. Leader Pelosi then asked “Who is America? Who are America?” Regardless, Leader Pelosi explained, there is no constitutional basis to ask a question about citizenship. Leader Pelosi next referenced the fact that many states assessed poll taxes in the past as a matter of course. Leader Pelosi then reiterated her concerns about the citizenship question having a chilling effect and noted that the answers will have an impact on the federal government. According to Leader Pelosi, the will determine the distribution of votes in Congress in the United States and it will show where people live and move and the “rest of that.” Leader Pelosi explained that for a long time, the Sun Belt has drawn people, and states in the Sun Belt received additional congressional seats because the census accurately counted Sun Belt residents. Leader Pelosi noted that in her district, there are a large number of people who were foreign born, and that this is the case throughout California, and that the citizenship question would have a chilling effect on response rate. Leader Pelosi stated that anytime the government seeks to ascertain certain information, particularly at public schools in her district, kids don’t show up because there is a fear. Questions that may seem appropriate lead to questions that are not appropriate, which in turn leads to a chilling effect. Leader Pelosi noted that even in bright red states, governors would be at a disadvantage if they needed resources but did not get them due to an undercount. According to Leader Pelosi, it is wrong to inject a citizenship question even if all of the things she is worried about are not true – she does not think it is in the public interest of the country.

Leader Pelosi noted that she would document this conversation and commented that the Secretary should be happy because the Census Bureau received a lot of money in the recently passed budget bill.

- Does not honor the vision of the founders
- Confidentiality concerns
- Impact federal programs and benefits
- Impact the distribution of votes in Congress
- Lower response rate
- Government mistrust
As part of his decision-making process, Secretary Ross spoke to a number of different stakeholders about the Department of Justice’s request to reinstate the citizenship question on the 2020 Decennial. These notes attempt to memorialize those conversations. These are not verbatim transcripts and each summary reflects the recollections of attendees from the Department of Commerce. Every effort has been made to ensure these notes are an accurate reflection of Secretary Ross’s conversations with stakeholders.

Christine Pierce, SVP of Data Science, Nielsen

On March 23, 2018, Secretary Ross and his staff spoke with Christine Pierce, Senior Vice President of Data Science for Nielsen. Ms. Pierce shared that Nielsen uses census data in a lot of important ways, specifically how they recruit and project samples. Ms. Pierce stated that Nielsen needed the census to be accurate and needed the census to be efficient and that the best census is one that produces the highest quality data at the lowest cost. Ms. Pierce stated that her biggest concerns was that the reinstatement of a citizenship question could lead to a lower response rate, and that the mailback rate (or initial response rate) is very important. Costs are lower when people respond the first time. Failure to respond increases costs because Census Bureau needs to deploy enumerators. Ms. Pierce stated that including a question on citizenship could make people less likely to respond, but that there is no data to predict how much lower the response rate might be.

In response to a question, Ms. Pierce stated that the longer a survey is, the less likely people are to respond. She further stated that the more sensitive the question, the more likely people are to be turned off by the question and decline to respond. Ms. Pierce explained that examples of sensitive questions included questions or religion and sexuality. Ms. Pierce stated that Nielsen sometimes chooses to ask sensitive questions even if they believe it will depress response rates. Ms. Pierce stated that Nielsen conducts a cost-benefit analysis to determine whether it is worth asking the question, even if it means having to do more extensive nonresponse follow-up. Ms. Pierce stated that sensitive questions often appeared on longer surveys and that longer surveys generally had lower response rates than shorter ones. Ms. Pierce stated that she was not aware of a short census survey that contained a sensitive question, but that Nielsen has tested some of the ACS questions perceived to be “sensitive” (birthplace and date of arrival in the US) on shorter surveys. Ms. Pierce noted that she and others at Nielsen were concerned about response rates declining due to the presence of the sensitive questions on the short questionnaire, but that Nielsen did not observe lower response rates to the survey. Ms. Pierce noted the importance of testing questions. She also noted that in the only specific situation she was aware of that sensitive questions were tested on a short questionnaire, there was no impact on response rates. Finally, in response to a question, Ms. Pierce stated that Nielsen incentivize participation with low dollar cash reward in the $1-$15 range. Ms. Pierce believed that for the survey referenced above, any incentive would have been at the lower end of the range.

- Lower response rate/higher NRFU
- Higher costs
- Testing
January 19, 2018

MEMORANDUM FOR: Wilbur L. Ross, Jr.
Secretary of Commerce

Through: Karen Dunn Kelley
Performing the Non-Exclusive Functions and Duties of the Deputy Secretary

Ron S. Jarmin
Performing the Non-Exclusive Functions and Duties of the Director

Enrique Lamas
Performing the Non-Exclusive Functions and Duties of the Deputy Director

From: John M. Abowd
Chief Scientist and Associate Director for Research and Methodology

Subject: Technical Review of the Department of Justice Request to Add Citizenship Question to the 2020 Census

The Department of Justice has requested block-level citizen voting-age population estimates by OMB-approved race and ethnicity categories from the 2020 Census of Population and Housing. These estimates are currently provided in two related data products: the PL94-171 redistricting data, produced by April 1st of the year following a decennial census under the authority of 13 U.S.C. Section 141, and the Citizen Voting Age Population by Race and Ethnicity (CVAP) tables produced every February from the most recent five-year American Community Survey data. The PL94-171 data are released at the census block level. The CVAP data are released at the census block group level.

We consider three alternatives in response to the request: (A) no change in data collection, (B) adding a citizenship question to the 2020 Census, and (C) obtaining citizenship status from administrative records for the whole 2020 Census population.

We recommend either Alternative A or C. Alternative C best meets DoJ’s stated uses, is comparatively far less costly than Alternative B, does not increase response burden, and does not harm the quality of the census count. Alternative A is not very costly and also does not harm the quality of the census count. Alternative B better addresses DoJ’s stated uses than Alternative A. However, Alternative B is very costly, harms the quality of the census count, and would use substantially less accurate citizenship status data than are available from administrative sources.
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Approved: _______________________________  Date: __________

John M. Abowd, Chief Scientist
and Associate Director for Research and Methodology
Detailed Analysis of Alternatives

The statistics in this memorandum have been released by the Census Bureau Disclosure Review Board with approval number CBDRB-2018-CDAR-014.

Alternative A: Make no changes

Under this alternative, we would not change the current 2020 Census questionnaire nor the planned publications from the 2020 Census and the American Community Survey (ACS). Under this alternative, the PL94-171 redistricting data and the citizen voting-age population (CVAP) data would be released on the current schedule and with the current specifications. The redistricting and CVAP data are used by the Department of Justice to enforce the Voting Rights Act. They are also used by state redistricting offices to draw congressional and legislative districts that conform to constitutional equal-population and Voting Rights Act nondiscrimination requirements. Because the block-group-level CVAP tables have associated margins of error, their use in combination with the much more precise block-level census counts in the redistricting data requires sophisticated modeling. For these purposes, most analysts and the DoJ use statistical modeling methods to produce the block-level eligible voter data that become one of the inputs to their processes.

If the DoJ requests the assistance of Census Bureau statistical experts in developing model-based statistical methods to better facilitate the DoJ’s uses of these data in performing its Voting Rights Act duties, a small team of Census Bureau experts similar in size and capabilities to the teams used to provide the Voting Rights Act Section 203 language determinations would be deployed.

We estimate that this alternative would have no impact on the quality of the 2020 Census because there would be no change to any of the parameters underling the Secretary’s revised life-cycle cost estimates. The estimated cost is about $350,000 because that is approximately the cost of resources that would be used to do the modeling for the DoJ.

Alternative B: Add the question on citizenship to the 2020 Census questionnaire

Under this alternative, we would add the ACS question on citizenship to the 2020 Census questionnaire and ISR instrument. We would then produce the block-level citizen voting-age population by race and ethnicity tables during the 2020 Census publication phase.

Since the question is already asked on the American Community Survey, we would accept the cognitive research and questionnaire testing from the ACS instead of independently retesting the citizenship question. This means that the cost of preparing the new question would be minimal. We did not prepare an estimate of the impact of adding the citizenship question on the cost of reprogramming the Internet Self-Response (ISR) instrument, revising the Census Questionnaire Assistance (CQA), or redesigning the printed questionnaire because those components will not be finalized until after the March 2018 submission of the final questions. Adding the citizenship question is similar in scope and cost to recasting the race and ethnicity questions again, should that become necessary, and would be done at the same time. After the 2020 Census ISR, CQA and printed questionnaire are in final form, adding the citizenship question would be much more expensive and would depend on exactly when the implementation decision was made during the production cycle.
For these reasons, we analyzed Alternative B in terms of its adverse impact on the rate of voluntary cooperation via self-response, the resulting increase in nonresponse followup (NRFU), and the consequent effects on the quality of the self-reported citizenship data. Three distinct analyses support the conclusion of an adverse impact on self-response and, as a result, on the accuracy and quality of the 2020 Census. We assess the costs of increased NRFU in light of the results of these analyses.

B.1. Quality of citizenship responses

We considered the quality of the citizenship responses on the ACS. In this analysis we estimated item nonresponse rates for the citizenship question on the ACS from 2013 through 2016. When item nonresponse occurs, the ACS edit and imputation modules are used to allocate an answer to replace the missing data item. This results in lower quality data because of the statistical errors in these allocation models. The analysis of the self-responses responses is done using ACS data from 2013-2016 because of operational changes in 2013, including the introduction of the ISR option and changes in the followup operations for mail-in questionnaires.

In the period from 2013 to 2016, item nonresponse rates for the citizenship question on the mail-in questionnaires for non-Hispanic whites (NHW) ranged from 6.0% to 6.3%, non-Hispanic blacks (NHB) ranged from 12.0% to 12.6%, and Hispanics ranged from 11.6 to 12.3%. In that same period, the ISR item nonresponse rates for citizenship were greater than those for mail-in questionnaires. In 2013, the item nonresponse rates for the citizenship variable on the ISR instrument were NHW: 6.2%, NHB: 12.3% and Hispanic: 13.0%. By 2016 the rates increased for NHB and especially Hispanics. They were NHW: 6.2%, NHB: 13.1%, and Hispanic: 15.5% (a 2.5 percentage point increase). Whether the response is by mail-in questionnaire or ISR instrument, item nonresponse rates for the citizenship question are much greater than the comparable rates for other demographic variables like sex, birthdate/age, and race/ethnicity (data not shown).

B.2. Self-response rate analyses

We directly compared the self-response rate in the 2000 Census for the short and long forms, separately for citizen and noncitizen households. In all cases, citizenship status of the individuals in the household was determined from administrative record sources, not from the response on the long form. A noncitizen household contains at least one noncitizen. Both citizen and noncitizen households have lower self-response rates on the long form compared to the short form; however, the decline in self-response for noncitizen households was 3.3 percentage points greater than the decline for citizen households. This analysis compared short and long form respondents, categories which were randomly assigned in the design of the 2000 Census.

We compared the self-response rates for the same household address on the 2010 Census and the 2010 American Community Survey, separately for citizen and noncitizen households. Again, all citizenship data were taken from administrative records, not the ACS, and noncitizen households contain at least one noncitizen resident. In this case, the randomization is over the selection of household addresses to receive the 2010 ACS. Because the ACS is an ongoing survey sampling fresh households each month, many of the residents of sampled households completed the 2010 ACS with the same reference address as they used for the 2010 Census. Once again, the self-response rates were lower in the ACS than in the 2010 Census for both citizen and noncitizen households. In this 2010 comparison, moreover, the decline in self-response was 5.1 percentage points greater for noncitizen households than for citizen households.
In both the 2000 and 2010 analyses, only the long-form or ACS questionnaire contained a citizenship question. Both the long form and the ACS questionnaires are more burdensome than the shortform. Survey methodologists consider burden to include both the direct time costs of responding and the indirect costs arising from nonresponse due to perceived sensitivity of the topic. There are, consequently, many explanations for the lower self-response rates among all household types on these longer questionnaires. However, the only difference between citizen and noncitizen households in our studies was the presence of at least one noncitizen in noncitizen households. It is therefore a reasonable inference that a question on citizenship would lead to some decline in overall self-response because it would make the 2020 Census modestly more burdensome in the direct sense, and potentially much more burdensome in the indirect sense that it would lead to a larger decline in self-response for noncitizen households.

B.3. Breakoff rate analysis

We examined the response breakoff paradata for the 2016 ACS. We looked at all breakoff screens on the ISR instrument, and specifically at the breakoffs that occurred on the screens with the citizenship and related questions like place of birth and year of entry to the U.S. Breakoff paradata isolate the point in answering the questionnaire where a respondent discontinues entering data—breaks off—rather than finishing. A breakoff is different from failure to self-respond. The respondent started the survey and was prepared to provide the data on the Internet Self-Response instrument, but changed his or her mind during the interview.

Hispanics and non-Hispanic non-whites (NHNW) have greater breakoff rates than non-Hispanic whites (NHW). In the 2016 ACS data, breakoffs were NHW: 9.5% of cases while NHNW: 14.1% and Hispanics: 17.6%. The paradata show the question on which the breakoff occurred. Only 0.04% of NHW broke off on the citizenship question, whereas NHNW broke off 0.27% and Hispanics broke off 0.36%. There are three related questions on immigrant status on the ACS: citizenship, place of birth, and year of entry to the United States. Considering all three questions Hispanics broke off on 1.6% of all ISR cases, NHNW: 1.2% and NHW: 0.5%. A breakoff on the ISR instrument can result in follow-up costs, imputation of missing data, or both. Because Hispanics and non-Hispanic non-whites breakoff much more often than non-Hispanic whites, especially on the citizenship-related questions, their survey response quality is differentially affected.

B.4. Cost analysis

Lower self-response rates would raise the cost of conducting the 2020 Census. We discuss those increased costs below. They also reduce the quality of the resulting data. Lower self-response rates degrade data quality because data obtained from NRFU have greater erroneous enumeration and whole-person imputation rates. An erroneous enumeration means a census person enumeration that should not have been counted for any of several reasons, such as, that the person (1) is a duplicate of a correct enumeration; (2) is inappropriate (e.g., the person died before Census Day); or (3) is enumerated in the wrong location for the relevant tabulation (https://www.census.gov/coverage_measurement/definitions/). A whole-person census imputation is a census microdata record for a person for which all characteristics are imputed.

Our analysis of the 2010 Census coverage errors (Census Coverage Measurement Estimation Report: Summary of Estimates of Coverage for Persons in the United States, Memo G-01) contains the relevant data. That study found that when the 2010 Census obtained a valid self-response (219 million persons),
the correct enumeration rate was 97.3%, erroneous enumerations were 2.5%, and whole-person census imputations were 0.3%. All erroneous enumeration and whole-person imputation rates are much greater for responses collected in NRFU. The vast majority of NRFU responses to the 2010 Census (59 million persons) were collected in May. During that month, the rate of correct enumerations was only 90.2%, the rate of incorrect enumeration was 4.8%, and the rate of whole-person census imputations was 5.0%. June NRFU accounted for 15 million persons, of whom only 84.6% were correctly enumerated, with erroneous enumerations of 5.7%, and whole-person census imputations of 9.6%. (See Table 19 of 2010 Census Memorandum G-01. That table does not provide statistics for all NRFU cases in aggregate.)

One reason that the erroneous enumeration and whole-person imputation rates are so much greater during NRFU is that the data are much more likely to be collected from a proxy rather than a household member, and, when they do come from a household member, that person has less accurate information than self-responders. The correct enumeration rate for NRFU household member interviews is 93.4% (see Table 21 of 2010 Census Memorandum G-01), compared to 97.3% for non-NRFU households (see Table 19). The information for 21.0% of the persons whose data were collected during NRFU is based on proxy responses. For these 16 million persons, the correct enumeration rate is only 70.1%. Among proxy responses, erroneous enumerations are 6.7% and whole-person census imputations are 23.1% (see Table 21).

Using these data, we can develop a cautious estimate of the data quality consequences of adding the citizenship question. We assume that citizens are unaffected by the change and that an additional 5.1% of households with at least one noncitizen go into NRFU because they do not self-respond. We expect about 126 million occupied households in the 2020 Census. From the 2016 ACS, we estimate that 9.8% of all households contain at least one noncitizen. Combining these assumptions implies an additional 630,000 households in NRFU. If the NRFU data for those households have the same quality as the average NRFU data in the 2010 Census, then the result would be 139,000 fewer correct enumerations, of which 46,000 are additional erroneous enumerations and 93,000 are additional whole-person census imputations. This analysis assumes that, during the NRFU operations, a cooperative member of the household supplies data 79.0% of the time and 21.0% receive proxy responses. If all of these new NRFU cases go to proxy responses instead, the result would be 432,000 fewer correct enumerations, of which 67,000 are erroneous enumerations and 365,000 are whole-person census imputations.

For Alternative B, our estimate of the incremental cost proceeds as follows. Using the analysis in the paragraph above, the estimated NRFU workload will increase by approximately 630,000 households, or approximately 0.5 percentage points. We currently estimate that for each percentage point increase in NRFU, the cost of the 2020 Census increases by approximately $55 million. Accordingly, the addition of a question on citizenship could increase the cost of the 2020 Census by at least $27.5 million. It is worth stressing that this cost estimate is a lower bound. Our estimate of $55 million for each percentage point increase in NRFU is based on an average of three visits per household. We expect that many more of these noncitizen households would receive six NRFU visits.

We believe that $27.5 million is a conservative estimate because the other evidence cited in this report suggests that the differences between citizen and noncitizen response rates and data quality will be amplified during the 2020 Census compared to historical levels. Hence, the decrease in self-response for citizen households in 2020 could be much greater than the 5.1 percentage points we observed during the 2010 Census.
**Alternative C: Use administrative data on citizenship instead of add the question to the 2020 Census**

Under this alternative, we would add the capability to link an accurate, edited citizenship variable from administrative records to the final 2020 Census microdata files. We would then produce block-level tables of citizen voting age population by race and ethnicity during the publication phase of the 2020 Census using the enhanced 2020 Census microdata.

The Census Bureau has conducted tests of its ability to link administrative data to supplement the decennial census and the ACS since the 1990s. Administrative record studies were performed for the 1990, 2000 and 2010 Censuses. We discuss some of the implications of the 2010 study below. We have used administrative data extensively in the production of the economic censuses for decades. Administrative business data from multiple sources are a key component of the production Business Register, which provides the frames for the economic censuses, annual, quarterly, and monthly business surveys. Administrative business data are also directly tabulated in many of our products.

In support of the 2020 Census, we moved the administrative data linking facility for households and individuals from research to production. This means that the ability to integrate administrative data at the record level is already part of the 2020 Census production environment. In addition, we began regularly ingesting and loading administrative data from the Social Security Administration, Internal Revenue Service and other federal and state sources into the 2020 Census data systems. In assessing the expected quality and cost of Alternative C, we assume the availability of these record linkage systems and the associated administrative data during the 2020 Census production cycle.

**C.1. Quality of administrate record versus self-report citizenship status**

We performed a detailed study of the responses to the citizenship question compared to the administrative record citizenship variable for the 2000 Census, 2010 ACS and 2016 ACS. These analyses confirm that the vast majority of citizens, as determined by reliable federal administrative records that require proof of citizenship, correctly report their status when asked a survey question. These analyses also demonstrate that when the administrative record source indicates an individual is not a citizen, the self-report is “citizen” for no less than 23.8% of the cases, and often more than 30%.

For all of these analyses, we linked the Census Bureau’s enhanced version of the SSA Numident data using the production individual record linkage system to append an administrative citizenship variable to the relevant census and ACS microdata. The Numident data contain information on every person who has ever been issued a Social Security Number or an Individual Taxpayer Identification Number. Since 1972, SSA has required proof of citizenship or legal resident alien status from applicants. We use this verified citizenship status as our administrative citizenship variable. Because noncitizens must interact with SSA if they become naturalized citizens, these data reflect current citizenship status albeit with a lag for some noncitizens.

For our analysis of the 2000 Census long-form data, we linked the 2002 version of the Census Numident data, which is the version closest to the April 1, 2000 Census date. For 92.3% of the 2000 Census long-form respondents, we successfully linked the administrative citizenship variable. The 7.7% of persons for whom the administrative data are missing is comparable to the item non-response for self-responders in the mail-in pre-ISR-option ACS. When the administrative data indicated that the 2000 Census respondent was a citizen, the self-response was citizen: 98.8%. For this same group, the long-form response was
noncitizen: 0.9% and missing: 0.3%. By contrast, when the administrative data indicated that the respondent was not a citizen, the self-report was citizen: 29.9%, noncitizen: 66.4%, and missing: 3.7%.

In the same analysis of 2000 Census data, we consider three categories of individuals: the reference person (the individual who completed the census form for the household), relatives of the reference person, and individuals unrelated to the reference person. When the administrative data show that the individual is a citizen, the reference person, relatives of the reference person, and nonrelatives of the reference person have self-reported citizenship status of 98.7%, 98.9% and 97.2%, respectively. On the other hand, when the administrative data report that the individual was a noncitizen, the long-form response was citizen for 32.9% of the reference persons; that is, reference persons who are not citizens according to the administrative data self-report that they are not citizens in only 63.3% of the long-form responses. When they are reporting for a relative who is not a citizen according to the administrative data, reference persons list that individual as a citizen in 28.6% of the long-form responses. When they are reporting for a nonrelative who is not a citizen according to the administrative data, reference persons list that individual as a citizen in 20.4% of the long-form responses.

We analyzed the 2010 and 2016 ACS citizenship responses using the same methodology. The 2010 ACS respondents were linked to the 2010 version of the Census Numident. The 2016 ACS respondents were linked to the 2016 Census Numident. In 2010, 8.5% of the respondents could not be linked, or had missing citizenship status on the administrative data. In 2016, 10.9% could not be linked or had missing administrative data. We reached the same conclusions using 2010 and 2016 ACS data with the following exceptions. When the administrative data report that the individual is a citizen, the self-response is citizen on 96.9% of the 2010 ACS questionnaires and 93.8% of the 2016 questionnaires. These lower self-reported citizenship rates are due to missing responses on the ACS, not misclassification. As we noted above, the item nonresponse rate for the citizenship question has been increasing. These item nonresponse data show that some citizens are not reporting their status on the ACS at all. In 2010 and 2016, individuals for whom the administrative data indicate noncitizen respond citizen in 32.7% and 34.7% of the ACS questionnaires, respectively. The rates of missing ACS citizenship response are also greater for individuals who are noncitizens in the administrative data (2010: 4.1%, 2016: 7.7%). The analysis of reference persons, relatives, and nonrelatives is qualitatively identical to the 2000 Census analysis.

In all three analyses, the results for racial and ethnic groups and for voting age individuals are similar to the results for the whole population with one important exception. If the administrative data indicate that the person is a citizen, the self-report is citizen at a very high rate with the remainder being predominately missing self-reports for all groups. If the administrative data indicate noncitizen, the self-report is citizen at a very high rate (never less than 23.8% for any racial, ethnic or voting age group in any year we studied). The exception is the missing data rate for Hispanics, who are missing administrative data about twice as often as non-Hispanic blacks and three times as often as non-Hispanic whites.

C.2. Analysis of coverage differences between administrative and survey citizenship data

Our analysis suggests that the ACS and 2000 long form survey data have more complete coverage of citizenship than administrative record data, but the relative advantage of the survey data is diminishing. Citizenship status is missing for 10.9 percent of persons in the 2016 administrative records, and it is missing for 6.3 percent of persons in the 2016 ACS. This 4.6 percentage point gap between administrative and survey missing data rates is smaller than the gap in 2000 (6.9 percentage points) and 2010 (5.6
percentage points). Incomplete (through November) pre-production ACS data indicate that citizenship item nonresponse has again increased in 2017.

There is an important caveat to the conclusion that survey-based citizenship data are more complete than administrative records, albeit less so now than in 2000. The methods used to adjust the ACS weights for survey nonresponse and to allocate citizenship status for item nonresponse assume that the predicted answers of the sampled non-respondents are statistically the same as those of respondents. Our analysis casts serious doubt on this assumption, suggesting that those who do not respond to either the entire ACS or the citizenship question on the ACS are not statistically similar to those who do; in particular, their responses to the citizenship question would not be well-predicted by the answers of those who did respond.

The consequences of missing citizenship data in the administrative records are asymmetric. In the Census Numident, citizenship data may be missing for older citizens who obtained SSNs before the 1972 requirement to verify citizenship, naturalized citizens who have not confirmed their naturalization to SSA, and noncitizens who do not have an SSN or ITIN. All three of these shortcomings are addressed by adding data from the United States Citizen and Immigration Services (USCIS). Those data would complement the Census Numident data for older citizens and update those data for naturalized citizens. A less obvious, but equally important benefit, is that they would permit record linkage for legal resident aliens by allowing the construction of a supplementary record linkage master list for such people, who are only in scope for the Numident if they apply for and receive an SSN or ITIN. Consequently, the administrative records citizenship data would most likely have both more accurate citizen status and fewer missing individuals than would be the case for any survey-based collection method. Finally, having two sources of administrative citizenship data permits a detailed verification of the accuracy of those sources as well.

C.3. Cost of administrative record data production

For Alternative C, we estimate that the incremental cost, except for new MOUs, is $450,000. This cost estimate includes the time to develop an MOU with USCIS, estimated ingestion and curation costs for USCIS data, incremental costs of other administrative data already in use in the 2020 Census but for which continued acquisition is now a requirement, and staff time to do the required statistical work for integration of the administrative-data citizenship status onto the 2020 Census microdata. This cost estimate is necessarily incomplete because we have not had adequate time to develop a draft MOU with USCIS, which is a requirement for getting a firm delivery cost estimate from the agency. Acquisition costs for other administrative data acquired or proposed for the 2020 Census varied from zero to $1.5M. Thus the realistic range of cost estimates, including the cost of USCIS data, is between $500,000 and $2.0M
Questions on the Jan 19 Draft Census Memo on the DoJ Citizenship Question
Reinstatement Request

1. With respect to Alternatives B and C, what is the difference, if any, between the time when the data collected under each alternative would be available to the public?

Since the collection of this data, whether from administrative records or from an enumerated question, occurs prior to the creation of the Microdata Detail File (MDF) from which all tabulations will be performed, there is no difference in the timing of when the data collected under either alternative B or C could be made available to the public. The exact date for completion of the MDF is still being determined as the 2020 Census schedule is matured. However, the 2020 Census is working towards publishing the first post-apportionment tabulation data products as early as the first week of February 2021.

2. What is the “2020 Census publication phase” (page 1 of the Detailed Analysis for Alternative B) versus Alternative C? Would there be any difference?

The 2020 Census publication phase is a broad window stretching from the release of the apportionment counts by December 31, 2020 through the last data product or report published in FY 2023, the final year of decennial funding for the 2020 Census. However, as stated in the answer to question 1, these data could be made available to the public on the same schedule as any other post-apportionment tabulated data product regardless of whether alternative B or C is used in its collection.

3. What is the non-response rate for: (A) each question on the 2000 and 2010 Decennial Census short form and (B) each question on the 2010 ACS and most recent ACS?

The table below shows the item non-response (INR) rate for each question on the 2000 and 2010 Decennial Census short form. This is the percentage of respondents who did not provide an answer to an item.

| Item Nonresponse Rates for 2000 and 2010 Short Form Person Questions |
|-----------------|----------------|----------------|----------------|----------------|----------------|
| Item            | Relationship | Sex  | Age  | Hispanic Origin | Race | Tenure |
| 2010            | 1.5          | 1.5  | 3.5  | 3.9            | 3.3  | 4.5    |
| 2000            | 1.3          | 1.1  | 3.7  | 3.1            | 2.9  | 4.1    |

Source: Rothhaas, Lestina and Hill (2012) Tables

Notes and Source:
From report:

The INR rate is essentially the proportion of missing responses before pre-editing or imputation procedures for a given item (i.e., the respondent did not provide an answer to the item). For INR, missing values are included in the rates, but inconsistent responses (i.e., incompatible with other responses) are considered non-missing responses.

Online link to 2010 report that has 2000 information as well.

See attached spreadsheet for the item allocation rates by questions for the ACS for 2010, 2013, and 2016.

4. What was the total survey response rate (i.e., percentage of complete questionnaires) for the 2000 long form and the 2000 short form? Of the incomplete long forms, what percentage left the citizenship question blank? Of the completed long forms, what percentage (if known) contained incorrect responses to the citizenship question?

We do not have measures of total survey response rates from the 2000 long form and 2000 short form available at this time. The mail response rate in 2000 was 66.4 percent for short forms and 53.9 percent for long forms. No analysis that we were aware of was conducted on the incomplete long forms that left the citizenship question blank. The Census 2000 Content Reinterview Survey showed low inconsistency of the responses to the citizenship question. Only 1.8 percent of the respondents changed answers in the reinterview.

Source for 2000 mail response rates:

https://www.census.gov/pred/www/rpts/B.5FR_RI.PDF

5. For the 2000 long and short forms, what was the percentage unanswered (left blank) for each question (i.e., what percentage of the responses for each question (sex, race, ethnicity, income, citizenship, etc.) were left blank)?

For the 2000 shortform, the table in question 3a provides the percentage unanswered for each question.

For the 2000 longform, Griffin, Love and Obenski (2003) summarized the Census 2000 longform responses. Allocation rates for individual items in Census 2000 were computed, but because of the magnitude of these data, summary allocation measures were derived.
These rates summarize completeness across all data items for occupied units (households) and are the ratio of all population and housing items that had values allocated to the total number of population and housing items required to have a response. These composite measures provide a summary picture of the completeness of all data. Fifty-four population items and 29 housing items are included in these summary measures. The analysis showed that 9.9 percent of the population question items and 12.5 percent of the housing unit question items required allocation. Allocation involves using statistical procedures, such as within-household or nearest neighbor matrices, to impute missing values.


6. What was the incorrect response rate for the citizenship question that was asked on the Long Form during the 2000 Decennial Census? Does the response rate on the 2000 Long Form differ from the incorrect response rate on the citizenship question for the ACS?

In the 2000 long form, 2.3 percent of persons have inconsistent answers, 89.4 percent have consistent answers, and 8.2 percent have missing citizenship data in the SSA Numident and/or the 2000 long form. Among persons with nonmissing citizenship data in the SSA Numident and/or the 2000 long form, 2.6 percent have inconsistent answers and 97.4 percent have consistent answers.

In the 2010 ACS, 3.1 percent of persons have inconsistent answers, 86.0 percent have consistent answers, and 10.8 percent have missing citizenship data in the SSA Numident and/or the 2010 ACS. Among persons with nonmissing citizenship data in the SSA Numident and/or the 2010 ACS, 3.6 percent have inconsistent answers and 96.4 percent have consistent answers.

In the 2016 ACS, 2.9 percent of persons have inconsistent answers, 81.2 percent have consistent answers, and 15.9 percent have missing citizenship data in the SSA Numident and/or the 2016 ACS. Among persons with nonmissing citizenship data in the SSA Numident and/or the 2016 ACS, 3.5 percent have inconsistent answers and 96.5 percent have consistent answers.

These ACS and 2000 Census long form rates are based on weighted data.

This shows that inconsistent response rates are higher in the 2010 and 2016 ACS than in the 2000 long form.

7. What is the incorrect response rate on other Decennial or ACS questions for which Census has administrative records available (for example, age, sex or income)?

Table 7a shows the agreement rates between the 2010 Census response and the SSA Numident for persons who could be linked and had nonmissing values, and Table 7b shows...
the agreement rates between the 2010 ACS and the SSA Numident. Gender has low
disagreement (0.4-0.5 percent), and white alone (0.9 percent), black alone (1.7-2 percent),
and age (2.1 percent) also have low disagreement rates. Disagreement rates are greater for
other races (e.g., 46.4-48.6 percent for American Indian or Alaska Native alone). Hispanic
origin is not well measured in the Numident, because it contains a single race response, one
of which is Hispanic.

Table 7a. Demographic Variable Agreement Rates Between the 2010 Census and the SSA
Numident

<table>
<thead>
<tr>
<th>2010 Census Response</th>
<th>Percent Agreement with SSA Numident</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hispanic</td>
<td>54.2</td>
</tr>
<tr>
<td>Not Hispanic</td>
<td>99.7</td>
</tr>
<tr>
<td>White Alone</td>
<td>99.1</td>
</tr>
<tr>
<td>Black Alone</td>
<td>98.3</td>
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<td>51.4</td>
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<td>Asian Alone</td>
<td>84.3</td>
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<tr>
<td>Native Hawaiian or Other Pacific Islander Alone</td>
<td>74.4</td>
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<td>Some Other Race Alone</td>
<td>17.7</td>
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<tr>
<td>Age</td>
<td>97.9</td>
</tr>
<tr>
<td>Gender</td>
<td>99.4</td>
</tr>
</tbody>
</table>

Census Planning Memoranda Series No. 247.

Table 7b. Demographic Variable Agreement Rates Between the 2010 Census and the SSA
Numident

<table>
<thead>
<tr>
<th>2010 ACS Response</th>
<th>Percent Agreement with SSA Numident</th>
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</thead>
<tbody>
<tr>
<td>White Alone</td>
<td>99.1</td>
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<td>Black Alone</td>
<td>98.0</td>
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<td>Age 0-2 Date of Birth</td>
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<tr>
<td>Age 3-17 Date of Birth</td>
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<tr>
<td>Age 18-24 Date of Birth</td>
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<td>Age 25-44 Date of Birth</td>
<td>95.8</td>
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<tr>
<td>Age 45-64 Date of Birth</td>
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<tr>
<td>Age 65-74 Date of Birth</td>
<td>96.5</td>
</tr>
<tr>
<td>Age 75 and older Date of Birth</td>
<td>92.7</td>
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<tr>
<td>Male</td>
<td>99.5</td>
</tr>
<tr>
<td>Female</td>
<td>99.5</td>
</tr>
</tbody>
</table>

Abowd and Stinson (2013) find correlations of 0.75-0.89 between Survey of Income and Program Participation (SIPP) and SSA Detailed Earnings Record annual earnings between 1990-1999.1

8. **How does the Census presently handle responses on the (A) Decennial Census and (B) the ACS when administrative records available to the Census confirm that the response on the Decennial Census or ACS is incorrect? Is the present Census approach to incorrect responses based on practice/policy or law (statute or regulation)?**

We have always based the short form Decennial Census and the ACS on self-response, and while we have procedures in place to address duplicate or fraudulent responses, we do not check the accuracy of the answers provided to the specific questions on the Census questionnaire. This is a long established practice at the Census Bureau that has been thoroughly tested and in place since 1970, when the Census Bureau moved to a mail-out/respond approach to the Decennial Census. Title 13 of the U.S. Code allows the Census Bureau to use alternative data sources, like administrative records, for a variety of purposes, and we are using data in new ways in the 2020 Census. While this includes the use of administrative records data to fill in areas where a respondent does not provide an answer, we have not explored the possibility of checking or changing responses that a responding household has provided in response to the questionnaire.

9. **Please explain the differences between the self-response rate analysis and the breakoff rate analysis. The range of breakoff rates between groups was far smaller than the range of self-response rates between groups.**

Self-response means that a household responded to the survey by mailing back a questionnaire or by internet, and a sufficient number of core questions were answered so that an additional field interview was not required.

A breakoff occurs when an internet respondent stops answering questions prior to the end of the questionnaire. In most cases the respondent answers the core questions before breaking off, and additional fieldwork is not required. The breakoff rates are calculated separately by which question screen was the last one reached before the respondent stopped answering altogether.

The share of Hispanic respondents who broke off at some point before the end of the questionnaire (17.6 percent) is much higher than for non-Hispanic whites (9.5 percent).

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Spreading the overall breakoff rates over 134 screens in the questionnaire works out to quite small rates per screen. It works out to an average breakoff rate of 0.131 percent per screen for Hispanics and 0.066 percent for non-Hispanic whites.

10. The NRFU numbers are comparatively small – approximately one additional household for NRFU per Census enumerator. Is this really a significant source of concern?

Yes, this is a significant concern. First, it gives rise to incremental NRFU cost of at least $27.5 million. This is a lower bound because it assumes the households that do not self-respond because we added a question on citizenship have the same follow-up costs as an average U.S. household. They won’t because these households overwhelmingly contain at least one noncitizen, and that is one of our acknowledged hard-to-count subpopulations.

11. Given that the breakoff rate difference was approximately 1 percent, why did Census choose to use the 5.1 percent number for assessing the cost of Alternative B?

If a household breaks off an internet response at the citizenship, place of birth, or year of entry screens, this means it would have already responded to the core questions. This would not trigger follow-up fieldwork and thus would not involve additional fieldwork costs. In contrast, if a household does not mail back a questionnaire or give an internet response, fieldwork will be necessary and additional costs will be incurred. Thus, the 5.1 percent number for differential self-response is more appropriate for estimating the additional fieldwork cost of adding a citizenship question.

12. Alternative C states that Census would use administrative data from the Social Security Administration, Internal Revenue Service, and “other federal and state sources.” What are the other sources?

In addition to continuing the acquisition of the Social Security Administration and Internal Revenue Service data, the Census Bureau is in discussion with the U.S. Citizen and Immigration Services (USCIS) staff to acquire additional citizenship data.

13. Is Census confident that administrative data will be able to be used to determine citizenship for all persons (e.g., not all citizens have social security numbers)?

We are confident that Alternative C is viable and that we have already ingested enough high-quality citizenship administrative data from SSA and IRS. The USCIS data are not required. They would, however, make the citizenship voting age tabulations better, but the administrative data we’ve got are very good and better than the data from the 2000 Census and current ACS. The type of activities required for Alternative C already occur daily and routinely at the Census Bureau. We have been doing this for business data products,
including the Economic Censuses, for decades. We designed the 2020 Census to use this technology too.

14. For Alternative C, the memo says, “we assume the availability of these record linkage systems and associated administrative data” – does Census already have in place access to this data or would this need to be negotiated? If negotiated, for which data sets specifically?

The Census Bureau has longstanding contractual relationships with the Social Security Administration and the Internal Revenue Service that authorize the use of data for this project. For new data acquired for this project (i.e., USCIS) we would estimate a six-month development period to put a data acquisition agreement in place. That agreement would also include terms specifying the authorized use of data for this project.

15. Are there any privacy issues / sensitive information prohibitions that might prevent other agencies from providing such data?

There are no new privacy or sensitivity issues associated with other agencies providing citizenship data. We have received such information in the past from USCIS. We are currently authorized to receive and use the data from SSA and IRS that are discussed in Alternative C.

16. How long would Census expect any negotiation for access to data take? How likely is it that negotiations would be successful? Are MOA’s needed/required?

Current data available to the Census Bureau provide the quality and authority to use that are required to support this project. Additional information potentially available from USCIS would serve to supplement/validate those existing data. We are in early discussions with USCIS to develop a data acquisition agreement and at this time have no indications that this acquisition would not be successful.

17. What limitations would exist in working with other agencies like IRS, Homeland Security, etc. to share data?

The context for sharing of data for this project is for a one-way sharing of data from these agencies to the Census Bureau. Secure file transfer protocols are in-place to ingest these data into our Title 13 protected systems. For those data already in-place at the Census Bureau to support this project, provisions for sharing included in the interagency agreement restrict the Census Bureau from sharing person-level microdata outside the Census Bureau’s Title 13 protections. Aggregates that have been processed through the Bureau’s disclosure avoidance procedures can be released for public use.
18. If Alternative C is selected, what is Census’s backup plan if the administrative data cannot be completely collected and utilized as proposed?

The backup plan is to use all of the administrative data that we currently have, which is the same set that the analyses of Alternative C used. We have verified that this use is consistent with the existing MOUs. We would then use estimation and modeling techniques similar to those used for the Small Area Income and Poverty Estimates (SAIPE) to impute missing citizenship status for those persons for whom we do not have administrative records. These models would also include estimates of naturalizations that occurred since the administrative data were ingested.

19. Does Census have any reason to believe that access to existing data sets would be curtailed if Alternative C is pursued?

No we do not believe that any access to existing data sets would be curtailed if we pursue Alternative C.

20. Has the proposed Alternative C approach ever been tried before on other data collection projects, or is this an experimental approach? If this has been done before, what was the result and what were lessons learned?

The approach in Alternative C has been routinely used in processing the economic censuses for several decades. The Bureau's Business Register was specifically redesigned for the 2002 Economic Census in order to enhance the ingestion and use of administrative records from the IRS and other sources. The data in these administrative records are used to substitute for direct responses in the economic censuses for the unsampled entities. They are also used as part of the review, edit, and imputation systems for economic censuses and surveys. On the household side, the approach in Alternative C was used extensively to build the residential characteristics for OnTheMap and OnTheMap for Emergency Management.

21. Is using sample data and administrative records sufficient for DOJ’s request?

The 2020 Census data combined with Alternative C are sufficient to meet DoJ's request. We do not anticipate using any ACS data under Alternative C.

22. Under Alternative C, if Census is able to secure interagency agreements to provide needed data sets, do we know how long it would take to receive the data transmission from other agencies and the length of time to integrate all that data, or is that unknown?

With the exception of the USCIS data, the data used for this project are already integrated into the 2020 Census production schema. In mid-to late 2018, we plan to acquire the USCIS data and with those data and our existing data begin to develop models and business rules to select citizenship status from the composite of sources and attach that characteristic to
each U.S. person. We expect the development and refinement of this process to continue into 2019 and to be completed by third quarter calendar year 2019.

23. Cross referencing Census decennial responses with numerous governmental data sets stored in various databases with differing formats and storage qualities sounds like it could be complicated. Does Census have an algorithm in place to efficiently combine and cross reference such large quantities of data coming from many different sources? What cost is associated with Alternative C, and what technology/plan does Census have in place to execute?

Yes, the 2018 Census End-to-End test will be implementing processing steps to be able to match Census responses to administrative record information from numerous governmental data sets. The Census Bureau has in place the Person Identification Validation System to assign Protected Identification Keys to 2020 Census responses. The required technology for linking in the administrative records is therefore part of the 2020 Census technology. This incremental cost factored into the estimate for Alternative C is for integrating the citizenship variable specifically, since that variable is not currently part of the 2020 Census design. No changes are required to the production Person Identification Validation system to integrate the administrative citizenship data.

24. For section C-1 of the memo, when did Census do the analyses of the incorrect response rates for non-citizen answers to the long form and ACS citizenship question? Were any of the analyses published?

The comparisons of ACS, 2000 Decennial Census longform and SSA Numident citizenship were conducted in January 2018. This analysis has not been published.

25. Has Census corrected the incorrect responses it found when examining non-citizen responses? If not, why not?

In the American Community Survey (ACS), and the short form Decennial Census, we do not change self-reported answers. The Decennial Census and the ACS are based on self-response and we accept the responses provided by households as they are given. While we have procedures in place to address duplicate or fraudulent responses, we do not check the accuracy of the answers provided to the specific questions on the Census questionnaires. This is a long established process at the Census Bureau that has been thoroughly tested and in place since 1970, when the Census Bureau moved to a mail-out/respond approach to the Decennial Census.

26. Has the Department of Justice ever been made aware of inaccurate reporting of ACS data on citizenship, so that they may take this into consideration when using the data?
Not exactly. The Census Bureau is in close, regular contact with the Department of Justice (DOJ) regarding their data requirements. Our counterparts at DOJ have a solid understanding of survey methodology and the quality of survey data, and they are aware of the public documentation on sampling and accuracy surrounding the ACS. However, the specific rate of accuracy regarding responses to the ACS question on citizenship has never been discussed.

27. Why has the number of persons who cannot be linked increased from 2010 to 2016?

The linkage between the ACS and administrative data from the SSA Numident and IRS ITIN tax filings depends on two factors: (a) the quality of the personally identifiable information (PII) on the ACS response and (b) whether the ACS respondent is in the SSN/ITIN universe.

With respect to the quality of the PII on the ACS, there may be insufficient information on the ACS due to item nonresponse or proxy response for the person to allow a successful match using the production record linkage system. There may also be more than one record in the Numident or ITIN IRS tax filings that matches the person’s PII. Finally, there may be a discrepancy between the PII provided to the ACS and the PII in the administrative records.

Alternatively, the person may not be in the Numident or ITIN IRS tax filing databases because they are out of the universe for those administrative systems. This happens when the person is a citizen without an SSN, or when the person is a noncitizen who has not obtained an SSN or ITIN.

Very few of the unlinked cases are due to insufficient PII in the ACS or multiple matches with administrative records. The vast majority of unlinked ACS persons have sufficient PII, but fail to match any administrative records sufficiently closely. This means that most of the nonmatches are because the ACS respondent is not in the administrative record universe.

The incidence of ACS persons with sufficient PII but no match with administrative records increased between 2010 and 2016. One contributing factor is that the number of persons linked to ITIN IRS tax filings in 2016 was only 39 percent as large as in 2010, suggesting that either fewer of the noncitizens in the 2016 ACS had ITINs, or more of them provided PII in the ACS that was inconsistent with their PII in IRS records.

28. Independent of this memo, what action does Census plan to take in response to the analyses showing that non-citizens have been incorrectly responding to the citizenship question?

The Census Bureau does not have plans to make any changes to procedures in the ACS. However, we will continue to conduct thorough evaluations and review of census and survey data. The ACS is focusing our research on the potential use of administrative records
in the survey. For instance, we are exploring whether we can use IRS data on income to reduce the burden of asking questions on income on the ACS. We are concentrating initially on questions that are high burden, e.g., questions that are difficult to answer or questions that are seen as intrusive.

29. Did Census make recommendations the last time a question was added?

Since the short form Decennial Census was established in 2010, the only requests for new questions we have received have been for the ACS. And, in fact, requests for questions prior to 2010 were usually related to the Decennial Census Long Form. We always work collaboratively with Federal agencies that request a new question or a change to a question. The first step is to review the data needs and the legal justification for the new question or requested changes. If, through this process, we determine that the request is justified, we work with the other agencies to test the question (cognitive testing and field testing). We also work collaboratively on the analysis of the results from the test which inform the final recommendation about whether or not to make changes or add the question.

30. Does not answering truthfully have a separate data standard than not participating at all?

We’re not sure what you’re asking here. Please clarify the question.

31. What was the process that was used in the past to get questions added to the decennial Census or do we have something similar where a precedent was established?

Because no new questions have been added to the Decennial Census (for nearly 20 years), the Census Bureau did not feel bound by past precedent when considering the Department of Justices’ request. Rather, the Census Bureau is working with all relevant stakeholders to ensure that legal and regulatory requirements are filled and that questions will produce quality, useful information for the nation. As you are aware, that process is ongoing at your direction.

32. Has another agency ever requested that a question be asked of the entire population in order to get block or individual level data?

Not to our knowledge. However, it is worth pointing out that prior to 1980 the short form of the Decennial Census included more than just the 10 questions that have been on the short form since 1990.

33. Would Census linking of its internal data sets, with other data sets from places like IRS and Homeland Security, have an impact on participation as well (i.e., privacy concerns)?
The potential that concerns about the use of administrative records could have an impact on participation has always been a concern of ours, and it’s a risk that we’re managing on our risk register. We’ve worked closely with the privacy community throughout the decade, and we established a working group on our National Advisory Committee to explore this issue. We’ve also regularly briefed the Congress about our plans. At this stage in the decade there does not appear to be extensive concerns among the general public about our approach to using administrative records in the Nonresponse Operation or otherwise. We will continue to monitor this issue.

34. Would Alternative C require any legislation? If so, what is the estimated time frame for approval of such legislation?

No.

35. Census publications and old decennial surveys available on the Census website show that citizenship questions were frequently asked of the entire population in the past. Citizenship is also a question on the ACS. What was the justification provided for citizenship questions on the (A) short form, (B) long form, and (C) ACS?

In 1940, the Census Bureau introduced the use of a short form to collect basic characteristics from all respondents, and a long form to collect more detailed questions from only a sample of respondents. Prior to 1940, census questions were asked of everyone, though in some cases only for those with certain characteristics. For example, in 1870, a citizenship question was asked, but only for respondents who were male and over the age of 21.

Beginning in 2005, all the long-form questions – including a question on citizenship -- were moved to the ACS. 2010 was the first time we conducted a short-form only census. The citizenship question is included in the ACS to fulfill the data requirements of the Department of Justice, as well as many other agencies including the Equal Employment Opportunities Commission, the Department of Health and Human Services, and the Social Security Administration.
<table>
<thead>
<tr>
<th>Title</th>
<th>2016</th>
<th>2013</th>
<th>2010</th>
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<tbody>
<tr>
<td>Overall housing allocation rate</td>
<td>4.9</td>
<td>5.6</td>
<td>5.2</td>
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<tr>
<td>occupied and vacant housing units</td>
<td></td>
<td></td>
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<tr>
<td>Overall person allocation rate</td>
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| Source | ACS 1-year data. See following links for more information:

** Note:**
** This item was not asked in this year.
Summary Analysis of the Key Differences Between Alternative C and Alternative D

This short note describes the Census Bureau’s current assumptions about two alternatives to address the need for block level data on citizen voting age populations. The goal is to measure the citizenship status of all people enumerated in the 2020 Decennial Census. Both alternatives utilize administrative data on the citizenship status of individuals, however one option, Alternative D, proposes to also include the current American Community Survey (ACS) question on citizenship status on the 2020 Decennial Census short form.

In both alternatives described here, the methodology requires linking 2020 census response data and administrative records. However, as illustrated both alternatives would also need to assign/impute citizenship for a portion of the population. The Census Bureau will have to assign citizenship in cases of questionnaire non-response and item non-response. Additionally, it is important to note, that even when a self-response is available it is not always possible to link response data with administrative records data. Poor data quality (e.g., name and age) and nonresponse or incomplete 2020 Census responses mean that we will not have a direct measure of citizenship status for all residents enumerated in 2020. The Census Bureau will need to employ an imputation model for these cases.

One of the key differences between the two alternatives described below is the number of cases requiring imputation. The other key difference is the impact of errors in the citizenship status reported on the 2020 Census.

In the most recent version of the 2020 Decennial Life Cycle Cost Estimate, the Census Bureau projects counting 330 million residents in 2020. Figure 1 summarizes how citizenship status will be measured under Alternative C that does not employ a citizenship question on the 2020 Census. Figure 2 summarizes how this will be done using both administrative records and a 2020 citizenship question under Alternative D.

Alternative C is a simplified process for assigning citizenship through direct linkage and modelling, without including the question on the 2020 Census. The Census Bureau will link the responses for the 330 million census records to administrative records that contain information on the citizenship status of individuals. The Census Bureau expects to successfully link and observe this status for approximately 295 million people. The Census Bureau would need to impute this status for approximately 35 million people under Alternative C whose 2020 responses cannot be linked to administrative data. Although the Census Bureau has fully developed and tested the imputation model, it has high confidence that an accurate model can be developed and deployed for this purpose. Further, we will most likely never possess a fully adequate truth deck to benchmark it to.

Measuring citizenship status is slightly more complex under Alternative D where all U.S. households will be given the opportunity to provide the citizenship status of each household member. Based on response data for the ACS citizenship and other response data research, we know that not all households that respond to the 2020 Census will answer this question, leaving the question blank or with otherwise invalid responses. Additionally, Alternative D, must also account for those households that do not respond at all or will have proxy responses. Due to these reasons, we estimate that we will get 2020 citizenship status responses for approximately 294.6 million people, a slightly higher estimate.
than Alternative C. For the 35.4 million people without a 2020 citizenship response, the Census Bureau will employ the same methodology as in Alternative C, linking the 2020 Census responses to the administrative records. The Census Bureau estimates that it will be able to link these cases to administrative records where we observe citizenship status for approximately 21.5 million people. For the remaining 13.8 million will be imputed through a model as described above. Thus, there will be a need for imputing many cases across either alternative.

The Census Bureau will link the 294.6 million records from the 2020 Census with the administrative records. This will be done both for potential quality assurance purposes and to improve the quality of future modeling uses. Based on the current research from the ACS, the Census Bureau expects to successfully link approximately 272.5 million of these cases. Of these, 263 million will have citizenship statuses that agree across the 2020 response and administrative record. The Census Bureau estimates there will be 9.5 million cases where there is disagreement across the two sources. Historic Census Bureau practice is to use self-reported data in these situations. However, the Census Bureau now knows from linking ACS responses on citizenship to administrative data that nearly one third of noncitizens in the administrative data respond to the questionnaire indicating they are citizens, indicating that this practice should be revisited in the case of measuring citizenship. Finally, for those 22.2 million cases that do not link to administrative records (non-linkage occurs for the same data quality reasons discussed above), the Census Bureau will use the observed 2020 responses. Again, Census Bureau expect some quality issues with these responses. Namely, the Census Bureau estimates that just under 500 thousand noncitizens will respond as citizens.

The relative quality of Alternative C versus Alternative D will depend on the relative importance of the errors in administrative data, response data, and imputations. To be slightly more but not fully precise consider the following description of errors under both alternatives. First note that all possible measurement methods will have errors. Under Alternative C, there will be error in the administrative records, but we believe these to be relatively limited due to the procedure following by SSA, USCIS and State. In both Alternative, the modeled cases will be subject to prediction error. Prediction error occur when the model returns the incorrect status of a case. As there are more models cases in Alternative C, prediction error will be a bigger issue there. Alternative D has an additional source or error, response error. This is where 2020 respondent give the incorrect status. Statisticians often hope these error are random and cancel out. However, we know from prior research that citizenship status responses are systematically biased for a subset of noncitizens. Response error is only an issue in alternative D. Unfortunately, the Census Bureau cannot quantify the relative magnitude of the errors across the alternatives at this time.
Figure 1

Alternative C

United States Census 2020

330,000,000

Linked

305,000,000

Adrec

Not linked

Model

35,000,000
Figure 2

Alternative D

United States Census 2020

330,000,000

2020 Citizenship Observed

Linked

272,500,000

Agree

2020=Adrec

263,000,000

Disagree

??

9,500,000

2020 Citizenship

22,200,000

Not linked

2020 Citizenship NOT Observed

Linked

35,400,000

Adrec

21,500,000

Not linked

Model

13,800,000
March 1, 2018

MEMORANDUM FOR: Wilbur L. Ross, Jr.
Secretary of Commerce

Through: Karen Dunn Kelley
Performing the Non-Exclusive Functions and Duties of the Deputy Secretary

Ron S. Jarmin
Performing the Non-Exclusive Functions and Duties of the Director

Enrique Lamas
Performing the Non-Exclusive Functions and Duties of the Deputy Director

From: John M. Abowd
Chief Scientist and Associate Director for Research and Methodology

Subject: Preliminary analysis of Alternative D (Combined Alternatives B and C)

See attached.

Approved: __________________ Date: __________
John M. Abowd, Chief Scientist
and Associate Director for Research and Methodology
Preliminary Analysis of Alternative D

At the Secretary’s request we performed a preliminary analysis of combining Alternative B (asking the citizenship question of every household on the 2020 Census) and Alternative C (do not ask the question, link reliable administrative data on citizenship status instead) in the January 19, 2018 draft memo to the Department of Commerce into a new Alternative D. Here we discuss Alternative D, the weaknesses in Alternative C on its own, whether and how survey data could address these weaknesses, implications of including a citizenship question for using administrative data, and methodological challenges.

Description of Alternative D: Administrative data from the Social Security Administration (SSA), Internal Revenue Service (IRS), U.S. Citizenship and Immigration Services (USCIS), and the State Department would be used to create a comprehensive statistical reference list of current U.S. citizens. Nevertheless, there will be some persons for whom no administrative data are available. To obtain citizenship information for this sub-population, a citizenship question would be added to the 2020 Census questionnaire. The combined administrative record and 2020 Census data would be used to produce baseline citizenship statistics by 2021. Any U.S. citizens appearing in administrative data after the version created for the 2020 Census would be added to the comprehensive statistical reference list. There would be no plan to include a citizenship question on future Decennial Censuses or American Community Surveys. The comprehensive statistical reference list, built from administrative records and augmented by the 2020 Census answers would be used instead. The comprehensive statistical reference list would be kept current, gradually replacing almost all respondent-provided data with verified citizenship status data.

What are the weaknesses in Alternative C?

In the 2017 Numident (the latest available), 6.6 million persons born outside the U.S. have blank citizenship among those born in 1920 or later with no year of death. The evidence suggests that citizenship is not missing at random. Of those with missing citizenship in the Numident, a much higher share appears to be U.S. citizens than compared to those for whom citizenship data are not missing. Nevertheless, some of the blanks may be noncitizens, and it would thus be useful to have other sources for them.

A second question about the Numident citizenship variable is how complete and timely its updates are for naturalizations. Naturalized citizens are instructed to immediately apply for a new SSN card. Those who wish to work have an incentive to do so quickly, since having an SSN card with U.S. citizenship will make it easier to pass the E-Verify process when applying for a job, and it will make them eligible for government programs. But we do not know what fraction of naturalized citizens actually notify the SSA, and how soon after being naturalized they do so.

A third potential weakness of Numident citizenship is that some people are not required to have a Social Security Number (SSN), whether they are a U.S. citizen or not. It would also be useful to have a data source on citizenship that did not depend on the SSN application and tracking process inside SSA. This is why we proposed the MOU with the USCIS for naturalizations, and why we have now begun pursuing an MOU with the State Department for data on all citizens with passports.
IRS Individual Taxpayer Identification Numbers (ITIN) partially fill the gap in Numident coverage of noncitizen U.S. residents. However, not all noncitizen residents without SSNs apply for ITINs. Only those making IRS tax filings apply for ITINs. Once again, it would be useful to have a data source that did not depend on the ITIN process. The USCIS and State Department MOUs would provide an alternative source in this context as well.

U.S. Citizenship and Immigration Services (USCIS) data on naturalizations, lawful permanent residents, and I-539 non-immigrant visa extensions can partially address the weaknesses of the Numident. The USCIS data provide up-to-date information since 2001 (and possibly back to 1988, but with incomplete records prior to 2001). This will fill gaps for naturalized citizens, lawful permanent residents, and persons with extended visa applications without SSNs, as well as naturalized citizens who did not inform SSA about their naturalization. The data do not cover naturalizations occurring before 1988, as well as not covering and some between 1988-2000. USCIS data do not always cover children under 18 at the time a parent became a naturalized U.S. citizen. Such children automatically become U.S. citizens under the Child Citizenship Act of 2000. The USCIS receives notification of some, but not all, of these child naturalizations. Others inform the U.S. government of their U.S. citizenship status by applying for U.S. passports, which are less expensive than the application to notify the USCIS. USCIS visa applications list people’s children, but those data may not be in electronic form.

U.S. passport data, available from the State Department, can help plug the gaps for child naturalizations, blanks on the Numident, and out-of-date citizenship information on the Numident for persons naturalized prior to 2001. Since U.S. citizens are not required to have a passport, however, these data will also have gaps in coverage.

Remaining citizenship data gaps in Alternative C include the following categories:

1. U.S. citizens from birth with no SSN or U.S. passport. They will not be processed by the production record linkage system used for the 2020 Census because their personally identifiable information won’t find a matching Protected Identification Key (PIK) in the Person Validation System (PVS).

2. U.S. citizens from birth born outside the U.S., who do not have a U.S. passport, and either applied for an SSN prior to 1974 and were 18 or older, or applied before the age of 18 prior to 1978. These people will be found in PVS, but none of the administrative sources discussed above will reliably generate a U.S. citizenship variable.

3. U.S. citizens who were naturalized prior to 2001 and did not inform SSA of their naturalization because they originally applied for an SSN after they were naturalized, and it was prior to when citizenship verification was required for those born outside the U.S. (1974). These people already had an SSN when they were naturalized and they didn’t inform SSA about the naturalization, or they didn’t apply for an SSN. The former group have inaccurate data on the Numident. The latter group will not be found in PVS.

4. U.S. citizens who were automatically naturalized if they were under the age of 18 when their parents became naturalized in 2000 or later, and did not inform USCIS or receive a U.S. passport. Note that such persons would not be able to get an SSN with U.S. citizenship on the card without either a U.S. passport or a certificate from USCIS. These people will also not be found in the PVS.
5. Lawful permanent residents (LPR) who received that status prior to 2001 and either do not have an SSN or applied for an SSN prior to when citizenship verification was required for those born outside the U.S. (1974). The former group will not be found in PVS. The latter group has inaccurate data in Numident.

6. Noncitizen, non-LPR, residents who do not have an SSN or ITIN and who did not apply for a visa extension. These persons will not be found in PVS.

7. Persons with citizenship information in administrative data, but the administrative and decennial census data cannot be linked due to missing or discrepant PII.

Can survey data address the gaps in Alternative C?

One might think that survey data could help fill the above gaps, either when their person record is not linked in the PVS, and thus they have no PIK, or when they have a PIK but the administrative data lack up-to-date citizenship information. Persons in Category 6, however, have a strong incentive to provide an incorrect answer, if they answer at all. A significant, but unknown, fraction of persons without PIKs are in Category 6. Distinguishing these people from the other categories of persons without PIKs is an inexact science because there is no feasible method of independently verifying their non-citizen status. Our comparison of ACS and Numident citizenship data suggests that a large fraction of LPRs provide incorrect survey responses. This suggests that survey-collected citizenship data may not be reliable for many of the people falling in the gaps in administrative data. This calls into question their ability to improve upon Alternative C.

With Alternative C, and no direct survey response, the Census Bureau’s edit and imputation procedures would make an allocation based primarily on the high-quality administrative data. In the presence of a survey response, but without any linked administrative data for that person, the edit would only be triggered by blank citizenship. A survey response of “citizen” would be accepted as valid. There is no scientifically defensible method for rejecting a survey response in the absence of alternative data for that respondent.

How might inclusion of a citizenship question on the questionnaire affect the measurement of citizenship with administrative data? Absent an in-house administrative data census, measuring citizenship with administrative data requires that persons in the Decennial Census be linked to the administrative data at the person level. The PVS system engineered into the 2020 Census does this using a very reliable technology. However, inclusion of a citizenship question on the 2020 Census questionnaire is very likely to reduce the self-response rate, pushing more households into Nonresponse Followup (NRFU). Not only will this likely lead to more incorrect enumerations, but it is also expected to increase the number of persons who cannot be linked to the administrative data because the NRFU PII is lower quality than the self-response data. In the 2010 Decennial Census, the percentage of NRFU persons who could be linked to administrative data rate was 81.6 percent, compared to 96.7 percent for mail responses. Those refusing to self-respond due to the citizenship question are particularly likely to refuse to respond in NRFU as well, resulting in a proxy response. The NRFU linkage rates were far lower for proxy responses than self-responses (33.8 percent vs. 93.0 percent, respectively).

Although persons in Category 6 will not be linked regardless of response mode, it is common for households to include persons with a variety of citizenship statuses. If the whole household does not self-
respond to protect the members in Category 6, the record linkage problem will be further aggravated. Thus, not only are citizenship survey data of suspect quality for persons in the gaps for Alternative C, collecting these survey data would reduce the quality of the administrative records when used in Alternative D by lowering the record linkage rate for persons with administrative citizenship data.

*What methodological challenges are involved when combining these sources?*

Using the 2020 Census data only to fill in gaps for persons without administrative data on citizenship would raise questions about why 100 percent of respondents are being burdened by a citizenship question to obtain information for the two percent of respondents where it is missing.

Including a citizenship question in the 2020 Census does not solve the problem of incomplete person linkages when producing citizenship statistics after 2020. Both the 2020 decennial record and the record with the person’s future location would need to be found in PVS to be used for future statistics.

In sum, Alternative D would result in poorer quality citizenship data than Alternative C. It would still have all the negative cost and quality implications of Alternative B outlined in the draft January 19, 2018 memo to the Department of Commerce.
To: Karen Dunn Kelley, Under Secretary for Economic Affairs

From: Secretary Wilbur Ross

Date: March 26, 2018

Re: Reinstatement of a Citizenship Question on the 2020 Decennial Census Questionnaire

Dear Under Secretary Kelley:

As you know, on December 12, 2017, the Department of Justice ("DOJ") requested that the Census Bureau reinstate a citizenship question on the decennial census to provide census block level citizenship voting age population ("CVAP") data that are not currently available from government survey data ("DOJ request"). DOJ and the courts use CVAP data for determining violations of Section 2 of the Voting Rights Act ("VRA"), and having these data at the census block level will permit more effective enforcement of the Act. Section 2 protects minority population voting rights.

Following receipt of the DOJ request, I set out to take a hard look at the request and ensure that I considered all facts and data relevant to the question so that I could make an informed decision on how to respond. To that end, the Department of Commerce ("Department") immediately initiated a comprehensive review process led by the Census Bureau.

The Department and Census Bureau’s review of the DOJ request – as with all significant Census assessments – prioritized the goal of obtaining complete and accurate data. The decennial census is mandated in the Constitution and its data are relied on for a myriad of important government decisions, including apportionment of Congressional seats among states, enforcement of voting rights laws, and allocation of federal funds. These are foundational elements of our democracy, and it is therefore incumbent upon the Department and the Census Bureau to make every effort to provide a complete and accurate decennial census.

At my direction, the Census Bureau and the Department’s Office of the Secretary began a thorough assessment that included legal, program, and policy considerations. As part of the process, I also met with Census Bureau leadership on multiple occasions to discuss their process for reviewing the DOJ request, their data analysis, my questions about accuracy and response rates, and their recommendations. At present, the Census Bureau leadership are all career civil servants. In addition, my staff and I reviewed over 50 incoming letters from stakeholders, interest groups, Members of Congress, and state and local officials regarding reinstatement of a citizenship question on the 2020 decennial census, and I personally had specific conversations on
the citizenship question with over 24 diverse, well informed and interested parties representing a broad range of views. My staff and I have also monitored press coverage of this issue.

Congress has delegated to me the authority to determine which questions should be asked on the decennial census, and I may exercise my discretion to reinstate the citizenship question on the 2020 decennial census, especially based on DOJ’s request for improved CVAP data to enforce the VRA. By law, the list of decennial census questions is to be submitted two years prior to the decennial census – in this case, no later than March 31, 2018.

The Department’s review demonstrated that collection of citizenship data by the Census has been a long-standing historical practice. Prior decennial census surveys of the entire United States population consistently asked citizenship questions up until 1950, and Census Bureau surveys of sample populations continue to ask citizenship questions to this day. In 2000, the decennial census “long form” survey, which was distributed to one in six people in the U.S., included a question on citizenship. Following the 2000 decennial census, the “long form” sample was replaced by the American Community Survey (“ACS”), which has included a citizenship question since 2005. Therefore, the citizenship question has been well tested.

DOJ seeks to obtain CVAP data for census blocks, block groups, counties, towns, and other locations where potential Section 2 violations are alleged or suspected, and DOJ states that the current data collected under the ACS are insufficient in scope, detail, and certainty to meet its purpose under the VRA. The Census Bureau has advised me that the census-block-level citizenship data requested by DOJ are not available using the annual ACS, which as noted earlier does ask a citizenship question and is the present method used to provide DOJ and the courts with data used to enforce Section 2 of the VRA. The ACS is sent on an annual basis to a sample of approximately 2.6 percent of the population.

To provide the data requested by DOJ, the Census Bureau initially analyzed three alternatives: Option A was to continue the status quo and use ACS responses; Option B was placing the ACS citizenship question on the decennial census, which goes to every American household; and Option C was not placing a question on the decennial census and instead providing DOJ with a citizenship analysis for the entire population using federal administrative record data that Census has agreements with other agencies to access for statistical purposes.

Option A contemplates rejection of the DOJ request and represents the status quo baseline. Under Option A, the 2020 decennial census would not include the question on citizenship that DOJ requested and therefore would not provide DOJ with improved CVAP data. Additionally, the block-group level CVAP data currently obtained through the ACS has associated margins of error because the ACS is extrapolated based on sample surveys of the population. Providing more precise block-level data would require sophisticated statistical modeling, and if Option A is selected, the Census Bureau advised that it would need to deploy a team of experts to develop model-based methods that attempt to better facilitate DOJ’s request for more specific data. But the Census Bureau did not assert and could not confirm that such data modeling is possible for census-block-level data with a sufficient degree of accuracy. Regardless, DOJ’s request is based at least in part on the fact that existing ACS citizenship data-sets lack specificity and
completeness. Any future modeling from these incomplete data would only compound that problem.

Option A would provide no improved citizenship count, as the existing ACS sampling would still fail to obtain actual, complete number counts, especially for certain lower population areas or voting districts, and there is no guarantee that data could be improved using small-area modeling methods. Therefore, I have concluded that Option A is not a suitable option.

The Census Bureau and many stakeholders expressed concern that Option B, which would add a citizenship question to the decennial census, would negatively impact the response rate for non-citizens. A significantly lower response rate by non-citizens could reduce the accuracy of the decennial census and increase costs for non-response follow up (“NRFU”) operations. However, neither the Census Bureau nor the concerned stakeholders could document that the response rate would in fact decline materially. In discussing the question with the national survey agency Nielsen, it stated that it had added questions from the ACS on sensitive topics such as place of birth and immigration status to certain short survey forms without any appreciable decrease in response rates. Further, the former director of the Census Bureau during the last decennial census told me that, while he wished there were data to answer the question, none existed to his knowledge. Nielsen’s Senior Vice President for Data Science and the former Deputy Director and Chief Operating Officer of the Census Bureau under President George W. Bush also confirmed that, to the best of their knowledge, no empirical data existed on the impact of a citizenship question on responses.

When analyzing Option B, the Census Bureau attempted to assess the impact that reinstatement of a citizenship question on the decennial census would have on response rates by drawing comparisons to ACS responses. However, such comparative analysis was challenging, as response rates generally vary between decennial censuses and other census sample surveys. For example, ACS self-response rates were 3.1 percentage points less than self-response rates for the 2010 decennial census. The Bureau attributed this difference to the greater outreach and follow-up associated with the Constitutionally-mandated decennial census. Further, the decennial census has differed significantly in nature from the sample surveys. For example, the 2000 decennial census survey contained only eight questions. Conversely, the 2000 “long form” sample survey contained over 50 questions, and the Census Bureau estimated it took an average of over 30 minutes to complete. ACS surveys include over 45 questions on numerous topics, including the number of hours worked, income information, and housing characteristics.

The Census Bureau determined that, for 2013-2016 ACS surveys, nonresponses to the citizenship question for non-Hispanic whites ranged from 6.0 to 6.3 percent, for non-Hispanic blacks ranged from 12.0 to 12.6 percent, and for Hispanics ranged from 11.6 to 12.3 percent. However, these rates were comparable to nonresponse rates for other questions on the 2013 and 2016 ACS. Census Bureau estimates showed similar nonresponse rate ranges occurred for questions on the ACS asking the number times the respondent was married, 4.7 to 6.9 percent; educational attainment, 5.6 to 8.5 percent; monthly gas costs, 9.6 to 9.9 percent; weeks worked in the past 12 months, 6.9 to 10.6 percent; wages/salary income, 8.1 to 13.4 percent; and yearly property insurance, 23.9 to 25.6 percent.
The Census Bureau also compared the self-response rate differences between citizen and non-citizen households’ response rates for the 2000 decennial census short form (which did not include a citizenship question) and the 2000 decennial census long form survey (the long form survey, distributed to only one in six households, included a citizenship question in 2000). Census found the decline in self-response rates for non-citizens to be 3.3 percent greater than for citizen households. However, Census was not able to isolate what percentage of decline was caused by the inclusion of a citizenship question rather than some other aspect of the long form survey (it contained over six times as many questions covering a range of topics). Indeed, the Census Bureau analysis showed that for the 2000 decennial census there was a significant drop in self-response rates overall between the short and long form; the mail response rate was 66.4 percent for the short form and only 53.9 percent for the long form survey. So while there is widespread belief among many parties that adding a citizenship question could reduce response rates, the Census Bureau’s analysis did not provide definitive, empirical support for that belief.

Option C, the use of administrative records rather than placing a citizenship question on the decennial census, was a potentially appealing solution to the DOJ request. The use of administrative records is increasingly part of the fabric and design of modern censuses, and the Census Bureau has been using administrative record data to improve the accuracy and reduce the cost of censuses since the early 20th century. A Census Bureau analysis matching administrative records with the 2010 decennial census and ACS responses over several more recent years showed that using administrative records could be more accurate than self-responses in the case of non-citizens. That Census Bureau analysis showed that between 28 and 34 percent of the citizenship self-responses for persons that administrative records show are non-citizens were inaccurate. In other words, when non-citizens respond to long form or ACS questions on citizenship, they inaccurately mark “citizen” about 30 percent of the time. However, the Census Bureau is still evolving its use of administrative records, and the Bureau does not yet have a complete administrative records data set for the entire population. Thus, using administrative records alone to provide DOJ with CVAP data would provide an incomplete picture. In the 2010 decennial census, the Census Bureau was able to match 88.6 percent of the population with what the Bureau considers credible administrative record data. While impressive, this means that more than 10 percent of the American population – some 25 million voting age people – would need to have their citizenship imputed by the Census Bureau. Given the scale of this number, it was imperative that another option be developed to provide a greater level of accuracy than either self-response alone or use of administrative records alone would presently provide.

I therefore asked the Census Bureau to develop a fourth alternative, Option D, which would combine Options B and C. Under Option D, the ACS citizenship question would be asked on the decennial census, and the Census Bureau would use the two years remaining until the 2020 decennial census to further enhance its administrative record data sets, protocols, and statistical models to provide more complete and accurate data. This approach would maximize the Census Bureau’s ability to match the decennial census responses with administrative records. Accordingly, at my direction the Census Bureau is working to obtain as many additional Federal and state administrative records as possible to provide more comprehensive information for the population.
It is my judgment that Option D will provide DOJ with the most complete and accurate CVAP data in response to its request. Asking the citizenship question of 100 percent of the population gives each respondent the opportunity to provide an answer. This may eliminate the need for the Census Bureau to have to impute an answer for millions of people. For the approximately 90 percent of the population who are citizens, this question is no additional imposition. And for the approximately 70 percent of non-citizens who already answer this question accurately on the ACS, the question is no additional imposition since census responses by law may only be used anonymously and for statistical purposes. Finally, placing the question on the decennial census and directing the Census Bureau to determine the best means to compare the decennial census responses with administrative records will permit the Census Bureau to determine the inaccurate response rate for citizens and non-citizens alike using the entire population. This will enable the Census Bureau to establish, to the best of its ability, the accurate ratio of citizen to non-citizen responses to impute for that small percentage of cases where it is necessary to do so.

Consideration of Impacts I have carefully considered the argument that the reinstatement of the citizenship question on the decennial census would depress response rate. Because a lower response rate would lead to increased non-response follow-up costs and less accurate responses, this factor was an important consideration in the decision-making process. I find that the need for accurate citizenship data and the limited burden that the reinstatement of the citizenship question would impose outweigh fears about a potentially lower response rate.

Importantly, the Department’s review found that limited empirical evidence exists about whether adding a citizenship question would decrease response rates materially. Concerns about decreased response rates generally fell into the following two categories – distrust of government and increased burden. First, stakeholders, particularly those who represented immigrant constituencies, noted that members of their respective communities generally distrusted the government and especially distrusted efforts by government agencies to obtain information about them. Stakeholders from California referenced the difficulty that government agencies faced obtaining any information from immigrants as part of the relief efforts after the California wildfires. These government agencies were not seeking to ascertain the citizenship status of these wildfire victims. Other stakeholders referenced the political climate generally and fears that Census responses could be used for law enforcement purposes. But no one provided evidence that reinstating a citizenship question on the decennial census would materially decrease response rates among those who generally distrusted government and government information collection efforts, disliked the current administration, or feared law enforcement. Rather, stakeholders merely identified residents who made the decision not to participate regardless of whether the Census includes a citizenship question. The reinstatement of a citizenship question will not decrease the response rate of residents who already decided not to respond. And no one provided evidence that there are residents who would respond accurately to a decennial census that did not contain a citizenship question but would not respond if it did (although many believed that such residents had to exist). While it is possible this belief is true, there is no information available to determine the number of people who would in fact not respond due to a citizenship question being added, and no one has identified any mechanism for making such a determination.
A second concern that stakeholders advanced is that recipients are generally less likely to respond to a survey that contained more questions than one that contained fewer. The former Deputy Director and Chief Operating Officer of the Census Bureau during the George W. Bush administration described the decennial census as particularly fragile and stated that any effort to add questions risked lowering the response rate, especially a question about citizenship in the current political environment. However, there is limited empirical evidence to support this view. A former Census Bureau Director during the Obama Administration who oversaw the last decennial census noted as much. He stated that, even though he believed that the reinstatement of a citizenship question would decrease response rate, there is limited evidence to support this conclusion. This same former director noted that, in the years preceding the decennial census, certain interest groups consistently attack the census and discourage participation. While the reinstatement of a citizenship question may be a data point on which these interest groups seize in 2019, past experience demonstrates that it is likely efforts to undermine the decennial census will occur again regardless of whether the decennial census includes a citizenship question. There is no evidence that residents who are persuaded by these disruptive efforts are more or less likely to make their respective decisions about participation based specifically on the reinstatement of a citizenship question. And there are actions that the Census Bureau and stakeholder groups are taking to mitigate the impact of these attacks on the decennial census.

Additional empirical evidence about the impact of sensitive questions on survey response rates came from the SVP of Data Science at Nielsen. When Nielsen added questions on place of birth and time of arrival in the United States (both of which were taken from the ACS) to a short survey, the response rate was not materially different than it had been before these two questions were added. Similarly, the former Deputy Director and COO of the Census during the George W. Bush Administration shared an example of a citizenship-like question that he believed would negatively impact response rates but did not. He cited to the Department of Homeland Security’s 2004 request to the Census Bureau to provide aggregate data on the number of Arab Americans by zip code in certain areas of the country. The Census Bureau complied, and Census employees, including the then-Deputy Director, believed that the resulting political firestorm would depress response rates for further Census Bureau surveys in the impacted communities. But the response rate did not change materially.

Two other themes emerged from stakeholder calls that merit discussion. First, several stakeholders who opposed reinstatement of the citizenship question did not appreciate that the question had been asked in some form or another for nearly 200 years. Second, other stakeholders who opposed reinstatement did so based on the assumption that the data on citizenship that the Census Bureau collects through the ACS are accurate, thereby obviating the need to ask the question on the decennial census. But as discussed above, the Census Bureau estimates that between 28 and 34 percent of citizenship self-responses on the ACS for persons that administrative records show are non-citizens were inaccurate. Because these stakeholder concerns were based on incorrect premises, they are not sufficient to change my decision.
Finally, I have considered whether reinstating the citizenship question on the 2020 Census will lead to any significant monetary costs, programmatic or otherwise. The Census Bureau staff have advised that the costs of preparing and adding the question would be minimal due in large part to the fact that the citizenship question is already included on the ACS, and thus the citizenship question has already undergone the cognitive research and questionnaire testing required for new questions. Additionally, changes to the Internet Self-Response instrument, revising the Census Questionnaire Assistance, and redesigning of the printed questionnaire can be easily implemented for questions that are finalized prior to the submission of the list of questions to Congress.

The Census Bureau also considered whether non-response follow-up increases resulting from inclusion of the citizenship question would lead to increased costs. As noted above, this estimate was difficult to assess given the Census Bureau and Department’s inability to determine what impact there will be on decennial census survey responses. The Bureau provided a rough estimate that postulated that up to 630,000 additional households may require NRFU operations if a citizenship question is added to the 2020 decennial census. However, even assuming that estimate is correct, this additional ½ percent increase in NRFU operations falls well within the margin of error that the Department, with the support of the Census Bureau, provided to Congress in the revised Lifecycle Cost Estimate (“LCE”) this past fall. That LCE assumed that NRFU operations might increase by 3 percent due to numerous factors, including a greater increase in citizen mistrust of government, difficulties in accessing the Internet to respond, and other factors.

Inclusion of a citizenship question on this country’s decennial census is not new – the decision to collect citizenship information from Americans through the decennial census was first made centuries ago. The decision to include a citizenship question on a national census is also not uncommon. The United Nations recommends that its member countries ask census questions identifying both an individual’s country of birth and the country of citizenship. Principals and Recommendations for Population and Housing Censuses (Revision 3), UNITED NATIONS 121 (2017). Additionally, for countries in which the population may include a large portion of naturalized citizens, the United Nations notes that, “it may be important to collect information on the method of acquisition of citizenship.” Id. at 123. And it is important to note that other major democracies inquire about citizenship on their census, including Australia, Canada, France, Germany, Indonesia, Ireland, Mexico, Spain, and the United Kingdom, to name a few.

The Department of Commerce is not able to determine definitively how inclusion of a citizenship question on the decennial census will impact responsiveness. However, even if there is some impact on responses, the value of more complete and accurate data derived from surveying the entire population outweighs such concerns. Completing and returning decennial census questionnaires is required by Federal law, those responses are protected by law, and inclusion of a citizenship question on the 2020 decennial census will provide more complete information for those who respond. The citizenship data provided to DOJ will be more accurate with the question than without it, which is of greater importance than any adverse effect that may result from people violating their legal duty to respond.
To conclude, after a thorough review of the legal, program, and policy considerations, as well as numerous discussions with the Census Bureau leadership and interested stakeholders, I have determined that reinstatement of a citizenship question on the 2020 decennial census is necessary to provide complete and accurate data in response to the DOJ request. To minimize any impact on decennial census response rates, I am directing the Census Bureau to place the citizenship question last on the decennial census form.

Please make my decision known to Census Bureau personnel and Members of Congress prior to March 31, 2018. I look forward to continuing to work with the Census Bureau as we strive for a complete and accurate 2020 decennial census.

CC: Ron Jarmin, performing the nonexclusive functions and duties of the Director of the Census Bureau

Enrique Lamas, performing the nonexclusive functions and duties of the Deputy Director of the Census Bureau