



August 2, 2018

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

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

Dear Ms. Jessup,

On behalf of The Partnership for America's Children, we write to offer comments on the 2020 Census proposed information collection.

The Partnership's mission is to support its network of state and community multi-issue child advocacy organizations in effective advocacy. The Partnership has 52 member organizations in 41 states that advocate to improve policies for children at the state, local and federal level. Collectively they represent over 90% of the nation's children. The Partnership connects its members to peer expertise and national resources and facilitates interstate collaborations to deepen the level of impact of child advocacy within and across states. It fosters policy expertise, advocacy skills, and strong organizations.

Partnership members use Census data in their advocacy, and thirty Partnership members are also KIDS COUNT grantees in their state, serving as that state's data hub on children for policy makers, administrators, and nonprofits organizations.

The Partnership for America's Children is serving as the national hub on the undercount of young children in the 2020 Decennial Census. In this role, the Partnership is co-leading a national working group of child-serving organizations that is developing strategies to help ensure that all young children are counted in the 2020 Census. The Partnership will be providing tools and resources to its members and national, state, and local advocates and

service providers to help them assist in the effort to ensure that all young children in their states or localities are counted.

The Partnership is deeply concerned about the issue of the high net undercount of young children, and submits these comments to identify the features of the proposed form and implementation process for the Decennial Census that will affect that undercount. Specifically, we want to:

- Commend the change to the Census questionnaire that asks for it to be filled out for all adults, children and babies
- Recommend that the citizenship question be removed because of its probable significant reduction in the number of young children that will be counted, both immigrants and citizens.
- Recommend a targeted communications effort including more research to encourage the parents and caregivers for young children to fill out the census and include their young children when they do.

The 2010 Census missed nearly one in ten children aged 0-4, or about 2 million children; the net young child undercount (after eliminating duplications) was nearly 5% or almost one million children.ⁱ This age group had by far the worst undercount of any age group. This trend of missing young children has been growing over the last several Decennial Censuses even as our ability to count other age groups has improved.ⁱⁱ

Even worse, the children that are missed most often are children of color.ⁱⁱⁱ Thus, children who are already disproportionately poor and most in need of strong communities and services are likely to get less than their fair share of federal and state dollars and adequate services in their communities.

Young children are generally undercounted for a plethora of reasons. These include:

- Almost 4.5 million children under age five live in hard-to-count neighborhoods.^{iv}
- It is widely believed that poor households are difficult to enumerate,^v and young children have a higher poverty rate than any other age group.
- Some young children may go uncounted because they live in large households. In 2010, nearly a quarter of young children lived in households of six or more people.
- Some young children have complicated living arrangements, moving often among various relatives or caregivers. Foster children, children living with grandparents or other relatives, and children whose parents are cohabiting but not married are also more likely to be missed. A recent study found 40 percent of all children under age five lived in a household with complex living arrangements.^{vi} The figures are higher for Black children (50 percent) and Latino children (55 percent). Young children in complex

households may be left off the Census questionnaires because respondents are uncertain whether to include a young child as a household resident.^{vii}

- Language barriers also contribute to the undercount of young children in households. In 2010, one-quarter of young Latino children lived in a linguistically isolated household where adults had difficulty speaking English.^{viii} It has been shown that language limitations cause respondents to report in error on the census questionnaire.^{ix}

The undercount of young children has a number of serious consequences for children, and many of those consequences last for at least a decade (for most of their childhood), including:

- less representation in Congress, state legislation, and school boards for communities with high numbers of young children;
- less federal funding for critical children's programs in states and particularly in the hard-to-count communities;
- inadequate data and planning information for policymakers and advocates for services such as adequate school capacity and community health services; and
- distorted data in all Census surveys for the next decade, since the Census Bureau uses population data from the Census (the only product which is not a survey but rather an all-population count) and annual population estimates based on the Decennial Census to set the sampling design for all its surveys.

Every year, more than \$800 billion in federal funds is allocated to states and localities based on census data, either directly or through Census population estimates and Census surveys that in turn rely on the Decennial Census.^x Here are some of the programs that affect children's lives for which funding is based in whole or in part on census data. (Unless noted, figures are for fiscal year 2015.)^{xi} Funding allocations for many other, smaller but important children's programs not listed here are also calculated using Decennial Census data.

- Title 1 grants to local education agencies—\$13.86 billion. These grants help local educational agencies (LEAs) improve teaching and learning in high-poverty schools. In 2010 Title 1 served more than 21 million children.^{xii} A Decennial Census undercount of children, particularly poor children, in a school district would result in reduced funding for that district.
- Special Education Grants (IDEA) – \$11.2 billion. Through the Individuals with Disabilities Education Act (IDEA), the federal government provides grants to states to assist them in ensuring a free public education environment that will allow children with disabilities to thrive. In 2015-16, IDEA part B served 6.7 million students or 13 percent of total public school enrollment.^{xiii} Through IDEA part C, federal funds assist states in providing early intervention services for infants and toddlers (0 – 2) and their families. IDEA part C covered almost 400,000 infants and toddlers and their families in 2015-16.^{xiv} Because

the grants are allocated based on the number of children and poor children in a community, if young children, particularly poor young children, are missed in a school district that state and school district will not get its fair share of IDEA funds.

- Children's Health Insurance Program (CHIP) – \$11 billion. CHIP was created in 1997 to reduce the number of uninsured children by providing subsidized insurance to children of the working poor through federal grants to states. The federal government pays most of the costs of the program, and the share of costs borne by the federal government varies by state using an enhanced match based on the Federal Medicaid Assistance Percentage (FMAP). CHIP covered 9.5 million children nationwide in FY 2017.^{xv} If many young children are missed in the Census in a state, the state funding for CHIP (and thus the states' ability to provide as comprehensive benefits as possible to as many children as possible) will be reduced.
- Head Start – \$8.2 billion. The Head Start program provides grants to local public and private nonprofit and for-profit agencies to provide child development services to economically disadvantaged children and families, with a special focus on helping preschoolers develop the early reading and math skills they need to be successful in school. In 2014, 1.1 million children were served through all Head Start programs.^{xvi} Head Start expansion funds are allocated based on numbers of poor children, so undercounts of young poor children would result in their communities getting less expansion funding for Head Start and early Head Start.
- Women, Infants and Children (WIC) -- \$6.3 billion. In 2017 each month WIC provided supplemental nutritious foods, nutrition education, and referrals to health and social services to 7.3 million low-income pregnant, breastfeeding and postpartum women, infants, and children to age five who have been determined to be at nutritional risk.^{xvii} The American Community Survey, which uses the Decennial Census and annual populations estimates based on the Decennial Census to design its sampling frame, is used to determine each state's fair share target for foods funding. (Grants for supplemental food equal about 70 percent of WIC grants to states.) A young child undercount could result in a lower state fair share target funding for supplemental food.
- Foster Care – \$4.6 billion. The Federal Foster Care Program helps to provide safe and stable out-of-home care for almost 500,000 children until they are safely returned home, permanently placed with adoptive families, or placed in other planned arrangements for permanency.^{xviii} An undercount of young poor children would result in a higher total per capita income in a state, and that in turn would result in a lower Federal Medicaid Assistance Percentage, and thus lower reimbursements for care for children in foster care. That tends to affect the level of services available for children.
- Child Care and Development Fund – \$2.9 billion in 2015 from the entitlement portion and an additional \$2.2 bill in appropriated funds in 2015^{xix}. The Child Care and

Development Fund assists low-income families, families receiving temporary public assistance, and those transitioning from public assistance in obtaining child care so they can work or receive training and education. In fiscal year 2015, nearly 1.4 million children benefited from the Child Care and Development Fund.^{xx} Funds to states are allocated based on numbers of children under 5, numbers under 13, and state median income, so an undercount of young children would reduce the state's child care funding.

Children in lower-income families also benefit from programs that serve adults as well as children:

- Medicaid – \$311.9 billion (for all beneficiaries). Medicaid is a federal-state insurance program that provides health coverage to low-income families and individuals, including children, parents, seniors, and people with disabilities. More than two-fifths, or almost 37 million,^{xxi} of Medicaid enrollees are children.^{xxii} The federal government pays for at least 50% of the costs of Medicaid, and more in many states. The Federal Medicaid Assistance Percentage is the formula by which the federal government's share of a state's Medicaid costs is calculated. A Decennial Census undercount of state population would result in a higher per capita Income in the FMAP formula and so a lower reimbursement rate.
- Section 8 Housing Assistance Payments Program – \$9.2 billion. Section 8 vouchers are the nation's leading source of housing assistance for low-income seniors, people with disabilities, and families with children, helping approximately 2.2 million households to secure affordable rental housing in the private market.^{xxiii} A local area undercount of children would result in that area receiving fewer housing vouchers, distorted family eligibility standards, and inappropriate rents per unit.

The consequences of an undercount also go far beyond the financial. If many young children are missed, school demographers will not know which areas need to build schools or add classrooms for when these children enter school, creating overcrowded classrooms and a lower quality of education for children who live in areas with many uncounted children. State and local governments often decide where to build health centers and provide other medical resources based on the number of people and poor people in a community, with new centers being built or old ones being closed. An undercount of young children will mean inadequate medical resources in the community. Businesses use Census data for planning where to put new enterprises; if a local community is undercounted, that may result in, for example, no business being willing to start a grocery store there and people having less access to healthy food.

For all these reasons, it is critical that the Census questionnaire and collection procedures are designed to ensure a full and fair count of young children. Accordingly, we wish to comment on two aspects of the Census form and an aspect of Decennial Census process.

First, we thank the Department of Commerce for altering the wording on the 2020 Census form in an effort to accurately count young children that have long been undercounted. We think this is an important first step, although by no means enough without further action.

Second, we urge the Department of Commerce to remove the citizenship question from the 2020 Census form, as it will contribute to an already troubling young child undercount—an outcome that the nation will have to live with for the next 10 years.

The risk of a significant young child undercount in the 2020 Decennial Census is even greater now that millions of immigrant families are likely to be afraid to respond to the Census because it will include a question on citizenship. Even before the citizenship question was added, Census staff were warning that the charged political environment would make it harder to persuade people to fill out the Census.^{xxiv} If the Census form actually asks about citizenship status, that effect will be much stronger.

This operates in at least three ways.

- In the current political environment, families are afraid to do anything that would draw attention to an undocumented family member. They are afraid that their family will be separated for ever, and they assume that information available to one branch of the government may become available to another part. Some 6.4 million children (about 9% of all US children) live in families with at least one undocumented member.^{xxv} Adding a citizenship question means that many of those children will be missed in the Census, because the family will be afraid to fill out the census form at all. Of those children, 1.9 million are under age 5.
- Moreover, in the current political environment, even immigrants that have green cards or other documentation authorizing their presence in the country may be afraid to fill out the citizenship question and the census. They fear that policies will change and even legal permanent residents will be at risk. Thus adding a citizenship question also means that 11% of all children age five or under (about 2.6 million children) are also at risk of not being counted.
- Finally, the administration has decided to scrutinize naturalized citizens to see if their citizenship should be revoked. This means that some fraction of the households where children live with naturalized citizen parents, which includes 7% of all children age 5 or younger, or about 1.7 million young children, may also decide not to fill out the Census form. While the impact is likely to be less severe in this third group, it is still likely to depress the count of young children to some extent.

According to the Census Bureau's 2016 American Community Survey only 1.3 percent of the population age 0 to 4 are not citizens.^{xxvi} The Constitution requires that every child (and every person) in the US should be counted, but it's noteworthy that the potential consequences of this question reach far beyond immigrants to harm young citizen children by reducing their access to the services and benefits they need to become productive healthy adults. The likely reduced response rate from the proposed citizenship question will create a severe, negative effect on programs vital to children and families.

While these reasons are unique to young children, there are other reasons to remove the citizenship question. The question is untested, so we have no idea how families will interpret it and how that will affect their reporting. For example, at the June 2018 Census Bureau's National Advisory Committee meeting it was revealed that some members of native American tribes will report themselves as noncitizens, even though they are citizens legally, because they consider themselves citizens of their tribe. Because the question is untested, we have no idea how other communities might understand and reply to the question, or how that might affect reporting on young children. How will dual citizens respond to this question? How will parents who are immigrants respond about their child that is a dual citizen? We simply have no idea. According to John Abowd from the U.S. Census Bureau, including the question risks providing misleadingly inaccurate data.^{xxvii}

Moreover, the overall costs to taxpayers of adding an untested question this late in the process to taxpayers is significant. According to the Census Bureau, every one percent decrease in the self-response rate will increase the cost of the count by \$55 million because Census enumerators will need to go to the household to collect the data.^{xxviii} In addition to the added costs of nonresponse rates, there is the additional costs of printing larger questionnaires, re-programming the online census instrument and the increased costs of processing more data. A five percent drop in self response would add an additional, unplanned \$275 million to the census.

In addition to these two census questions, we also wish to comment on the Census Bureau process for researching messages and developing materials to help persuade families with young children to fill out the census.

While the Bureau conducted over 40 focus groups with many different groups at risk of being undercounted as part of its messaging research, not a single focus group was specifically for parents and caregivers of young children, even though in 2010 this was the group with the biggest absolute undercount. Moreover, the Census Barriers, Attitudes and Motivators Survey (CBAMS) survey of 50,000 people did not ask any questions specific to parents and caregivers of young children, although it did identify which respondents had young children in their

households.^{xxix} We urge the Bureau to conduct research to address these lacks, focusing specifically on families with young children that live in hard to count areas or have some of the factors described above that particularly put children at risk of not being counted, such as complex families. We also urge the Bureau to investigate what types of messengers families with young children are most likely to trust, particularly around issues related to children. We also ask the Bureau to research whether families of young children trust and rely on faith leaders, child care and preschool staff, social service agency staff, and medical staff—the four groups that we think families with young children most consistently encounter. We ask them to research which media sources these families pay attention to, including print, TV, radio, and a variety of social media. Finally, we encourage them to design their outreach campaigns to include the messengers and the media outlets that families with young children are most likely to hear and to trust.

We believe a full, fair, and accurate census must include a count of everyone living in this country, including its youngest members. As advocates that use Census data to assess the well-being of children and identify policy changes, we know that policy makers need reliable, useful, objective data about our nation's people, housing, economy, and communities. A nationwide census that counts every person is required by the Constitution. It is integral to our democracy because it ensures that district lines and political power are fairly drawn and allocated. It is fundamental to the federal government's formulas for distributing at least \$800 billion annually in federal assistance to states, localities, and families.^{xxx} It is essential to guide important community decisions affecting schools, housing, health care services, business investment, and much more.

This is why we thank you for updating the language on the primary solicitation materials that most households will receive in 2020 to "...all adults, children, and babies living or staying at this address," instead of "...everyone living or staying at this address."^{xxxi} This is why the Bureau should remove the question on citizenship that the weight of scientific evidence indicates will undermine a successful count of our nation's people. And this is why the Bureau should revamp its communications research and outreach to include special attention to the undercount of young children.

Even before Secretary Ross decided to place a citizenship question on the 2020 Census, state and local officials and community leaders were deeply concerned about the difficulty of achieving robust participation in many communities. As child advocates, we are particularly concerned that this question will disproportionately reduce the count of young children, already the group most missed in the 2010 Census.

A full, fair, and accurate census is absolutely critical for our country and our communities. It will shape the lives of our youngest children at the most critical points in their development. For the reasons discussed above, we strongly oppose asking about citizenship status in the 2020 Census and urge the Department of Commerce to remove the proposed citizenship question from the data collection forms. We also ask the Department to expand its communications efforts to include a thorough investigation of and implementation of the best methods for persuading families with young children to complete the Census.

Sincerely,

Deborah Stein,
Network Director (and CEO)
The Partnership for America's Children

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- ⁱ KIDS COUNT Data Book 2018, <http://www.aecf.org/m/resourcedoc/aecf-2018kidscountdatabook-2018.pdf>, citing <https://www2.census.gov/programs-surveys/decennial/2020/program-management/memo-series/2020-report-2010-undercount-children-ommissions.pdf>
- ⁱⁱ The Undercount of Young Children, 2014, <https://www.census.gov/content/dam/Census/library/working-papers/2014/demo/2014-undercount-children.pdf>
- ⁱⁱⁱ O'Hare, W.P. (2015). The Undercount of Young Children in the U.S. Decennial Census, Springer Publishers.
- ^{iv} KIDS COUNT Data Book 2018 <http://www.aecf.org/m/resourcedoc/aecf-2018kidscountdatabook-2018.pdf> citing U.S. Census Bureau, 2012–16 American Community Survey
- ^v Fernandez, L., Shattuck, R. and Noon, J. (2018), The Use of Administrative Records and the American Community Survey to Study the Characteristics of Undercounted Young Children in the 2010 Census, U.S. Census Bureau Center, CARRA Working Paper Series. Working Paper Series #2018 – 05, U.S. Census Bureau, Washington, DC.
- ^{vi} Jensen, E. (2017) Presentation at the Children's Leadership Council – Census Bureau meeting, April 13, 2017, Washington DC.
- ^{vii} O'Hare, W.P. (2015) The Undercount of Young Children in the U.S. Census, Springer Publishers, Page 95.
- ^{viii} U.S. Census Bureau (2017). Investigating the 2010 Undercount of Young Children – A Comparison of Demographic, Housing, and Household Characteristics of Children by Age, January 18, 2017.
- ^{ix} U.S. Census Bureau (2017). Investigating the 2010 Undercount of Young Children – A Comparison of Demographic, Housing, and Household Characteristics of Children by Age, January 18, 2017.
- ^xCounting for Dollars 2020The Role of the Decennial Census in the Geographic Distribution of Federal Funds Report #2: Estimating Fiscal Costs of a Census Undercount to States, <https://gwipp.gwu.edu/sites/g/files/zaxdzs2181/f/downloads/GWIPP%20Reamer%20Fiscal%20Impacts%20of%20Census%20Undercount%20on%20FMAP-based%20Programs%2003-19-18.pdf> .
- ^{xi} Counting for Dollars 2020: The Role of the Decennial Census in the Geographic Distribution of Federal Funds, Initial Analysis: 16 Large Census-guided Financial Assistance Programs <https://gwipp.gwu.edu/sites/g/files/zaxdzs2181/f/downloads/United%20States%2008-18-17.pdf> and <https://gwipp.gwu.edu/sites/g/files/zaxdzs2181/f/downloads/Special%20Ed%20IDEA%20CFD%2008-18-17.pdf> .
- ^{xii} National Center for Education Statistics Fast Facts, <https://nces.ed.gov/fastfacts/display.asp?id=158> .
- ^{xiii} “Number of children and students served under IDEA, Part B, by age group and state.” <https://www2.ed.gov/programs/osepidea/618-data/static-tables/index.html>
- ^{xiv} “Number of infants and toddlers ages birth through 2 and 3 and older, and percentage of population, receiving early intervention services under IDEA, Part C, by age and state.” <https://www2.ed.gov/programs/osepidea/618-data/static-tables/index.html>
- ^{xv} Unduplicated Number of Children Ever Enrolled in CHIP and Medicaid, <https://www.medicaid.gov/chip/downloads/fy-2017-childrens-enrollment-report.pdf>
- ^{xvi} Disparate Access, February 2016, <https://www.clasp.org/sites/default/files/publications/2017/04/Disparate-Access.pdf>
- ^{xvii} Frequently Asked, Questions about WIC, <https://www.fns.usda.gov/wic/frequently-asked-questions-about-wic> .

^{xxiii} KIDS COUNT Data Center, <https://datacenter.kidscount.org/data/tables/6243-children-in-foster-care#detailed/1/any/false/870,573,869,36,868,867,133,38,35,18/any/12987> This is point -in-time data, and the total number of children served in foster care over the course of a year is higher.

^{xxix}Fiscal Year 2015 Federal Child Care and Related Appropriations <https://www.acf.hhs.gov/occ/resource/fiscal-year-2015-federal-child-care-and-related-appropriations>

^{xx} FY 2015 Preliminary Data Table 1 - Average Monthly Adjusted Number of Families and Children Served, <https://www.acf.hhs.gov/occ/resource/fy-2015-preliminary-data-table-1> .

^{xxi} Unduplicated Number of Children Ever Enrolled in CHIP and Medicaid, <https://www.medicaid.gov/chip/downloads/fy-2017-childrens-enrollment-report.pdf>

^{xxii}Policy Basics: Introduction to Medicaid, <http://www.cbpp.org/research/health/policy-basics-introduction-to-medicaid>.

^{xxiii} 2017 Federal Rental Assistance Factsheet, <https://www.cbpp.org/sites/default/files/atoms/files/4-13-11hous-US.pdf> .

^{xxiv}MEMORANDUM FOR Associate Directorate for Research and Methodology (ADRM), <https://www2.census.gov/cac/nac/meetings/2017-11/Memo-Regarding-Respondent-Confidentiality-Concerns.pdf>

^{xxv} Source: Pew Research Center tabulations of augmented 2015 American Community Survey (IPUMS).See Passel and Cohn (2017) for details on methodology. <http://www.pewhispanic.org/2016/09/20/overall-number-of-u-s-unauthorized-immigrants-holds-steady-since-2009/> .

^{xxvi} Calculated from the IPUMS system at the University of Minnesota.

^{xxvii} Census Bureau’s chief scientist warned secretary in memo against adding citizenship question,<http://thehill.com/homenews/administration/391527-census-bureau-official-warned-in-memo-against-adding-citizenship> citing <http://www.osec.doc.gov/opog/FOIA/Documents/AR%20-%20FINAL%20FILED%20-%20ALL%20DOCS%20%5bCERTIFICATION-INDEX-DOCUMENTS%5d%206.8.18.pdf#page=1289> p1289.

^{xxviii} Memo to Secretary of Commerce Wilbur Ross from John M. Abowd Chief Scientist and Associate Director for Research and Methodology , January 19, 2018, <http://www.osec.doc.gov/opog/FOIA/Documents/AR%20-%20FINAL%20FILED%20-%20ALL%20DOCS%20%5bCERTIFICATION-INDEX-DOCUMENTS%5d%206.8.18.pdf#page=1289> p. 1294

^{xxix} Walejko, G (2018) Presentation at the Children’s Leadership Council meeting, June 8, 2018, Washington DC.

^{xxx}<https://gwipp.gwu.edu/sites/g/files/zaxdzs2181/f/downloads/GWIPP%20Reamer%20Fiscal%20Impacts%20of%20Census%20Undercount%20on%20FMAP-based%20Programs%2003-19-18.pdf>

^{xxxi} Fontenot, A.E., Jr. (2018) Presentation at the Children’s Leadership Council meeting, June 8, 2018, Washington DC.