



Responsible Policy. Real Prosperity

January 28, 2019

Thomas P. Dickson
Rural Development Innovation Center
1400 Independence Avenue SW.,
STOP 1522, Room 5164, South Building
Washington, DC 20250-1522

Re: Comments on Proposed Information Collection on
2020 Census, Docket No. OMB-2018-0004

Dear Mr. Dickson:

On behalf of the Kansas Center for Economic Growth (KCEG), we write to offer comments on the 2020 Census proposed information collection.

KCEG is a nonprofit, nonpartisan organization that conducts research and analysis to promote balanced state policies that help ensure every Kansan prospers. Our mission is to advance responsible policies by informing public discussion through credible, fact-based materials. We serve policymakers, the media and every Kansan who wants to engage in making our state a place where opportunity and economic growth are widely shared. Our organization wants to ensure every Kansan is counted in the 2020 Census, regardless of citizenship or immigration status. A question about citizenship would deter survey takers, both citizens and immigrants, from responding to the survey and put Kansans at grave risk of a significant undercount.

The 2020 census will determine federal funding for the next decade. If Kansans are undercounted, Kansas communities will not get their fair share of federal dollars for programs including Head Start, school lunches, Medicaid, housing, child care, and other programs. These programs are essential to help Kansas families thrive. As Kansas works to recover from devastating budget cuts, it is important to have accurate data to ensure we are receiving the necessary amount of federal funding. An accurate Census count is also important as we address school funding in response to the Gannon v. Kansas decision.



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There is also a substantial cost to taxpayers when self-response rates decrease. According to the Census Bureau, every 1 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.¹ 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 5 percent drop in self response would add an additional, unplanned \$275 million in costs to the census.

Even without a citizenship question, there are real challenges to securing an accurate population count. For example, in the 2010 U.S. Census, one million children younger than age 5 were not counted.² To add a citizenship question will only exacerbate the difficulty in making sure every Kansan, both citizen and immigrant, is counted.

In Kansas, immigrant families already face increased uncertainty, interrupted routines, and decreased access to nutrition and health care services due to recent changes in immigration policy.³ Families in Kansas and across the country are afraid to participate in any program, task, or enrollment that could intentionally or unintentionally negatively affect an undocumented family member. If families are afraid to complete the Census form, many immigrant families will fail to be counted. This will result in Kansans living in an area with many immigrants, regardless of immigration status, being at risk for not getting the resources they deserve.

The Kansas Center for Economic Growth urges the Department of Commerce and the U.S. Census Bureau to remove the citizenship question from the 2020 Census form, to avoid an undercount, which will have implications for the next decade. In addition, our country is currently in a political environment defined by heightened anti-immigrant rhetoric. In this threatening environment, the Census should not

¹ 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.

² Annie E. Casey Foundation. "2018 Kids Count Data Book: State Trends in Child Well-Being." http://www.aecf.org/resources/2018-kids-count-data-book/?gclid=CjwKCAjwIXbBRBhEiwAWV-5nu00NK5nmZSo4QqWluTbZv2jiASm79MXDM7QzZLxXdMgvgAFfASs2BoChVQQAvD_BwE

³ Cervantes, Wendy, Rebecca Ullrich, and Hannah Matthews. "Our Children's Fear: Immigration Policy's Effects on Young Children." Center for Law and Social Policy. https://www.clasp.org/sites/default/files/publications/2018/03/2018_ourchildrensfears.pdf



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include questions that will intentionally add to stresses and inequity faced by immigrant communities, while taking away resources from already underserved communities.

An accurate Census count is critical for Kansas and its local communities as we continue to work to reinvest in our state. An undercount will lead to a lack of adequate funding for programs and services, which will make it difficult for Kansans to access the programs and services they need. Kansas policymakers and advocates need reliable, useful, objective data about Kansas' population, housing, economy, and communities. For these reasons and more, we urge the Department of Commerce to remove the proposed citizenship question from the data collection forms.

Sincerely,

A handwritten signature in black ink that reads "Emily Fetsch". The signature is written in a cursive, flowing style.

Emily Fetsch
Director of Policy and Research