



## The American Statistical Association Strongly Cautions against Addition of a Citizenship Question on the 2020 Census

August 2, 2018

The American Statistical Association (ASA) appreciates this opportunity to respond to the comment request from the U.S. Census Bureau on the 2020 census. As the oldest American scientific professional society we have a proud tradition of supporting the Census Bureau. Indeed, the first modernization of the census in time for the 1850 decennial count was due in large part to the urging and work of the ASA.<sup>1</sup>

The decennial census forms the backbone of the U.S. data infrastructure, supporting our economy, health, and well-being. Providing the foundation for evidence-based policymaking and data-driven decision-making, its impact on the public and private sectors is broad and profound. In these comments, we focus on the March 2018 addition of the citizenship question to the questionnaire, a decision made by Secretary of Commerce Wilbur Ross, apparently against the advice of career Census Bureau officials.<sup>2</sup>

We reiterate ASA President Lisa LaVange's message to Secretary Ross in January 2018,<sup>3</sup> "strongly caution[ing] against adding this or any other question at this late stage of the process unless there is convincing evidence that its impact will be minimal." We urge the question be removed because of the very strong potential the quality of the census will be undermined by its inclusion and because of the lack of scientific justification.

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<sup>1</sup> [http://magazine.amstat.org/blog/2016/12/01/asa\\_census/](http://magazine.amstat.org/blog/2016/12/01/asa_census/)

<sup>2</sup> <http://thehill.com/homenews/administration/391527-census-bureau-official-warned-in-memo-against-adding-citizenship>

<sup>3</sup> <http://www.amstat.org/asa/files/pdfs/POL-CitizenshipQuestion.pdf>

It is an established scientific standard that instrumentation in large-scale data collections should not be changed without adequate time to field test and evaluate the impact of the changes before the data collection takes place. The addition of a potentially sensitive question, such as this one about citizenship, is a change in instrumentation that has the potential to compromise the validity and integrity of results from the census.

Adding a citizenship question at this late stage of the decennial census process would likely increase distrust or suspicion of the government among immigrants, many of whom are already anxious about government inquiries and activities. Indeed, the Census Bureau researchers reported in 2017 an increase “in respondents spontaneously expressing concerns to researchers and field staff about confidentiality and data access relating to immigration” and “observation of increased rates of unusual respondent behaviors during pretesting and production surveys (data falsification, item non-response, break-offs).”<sup>4</sup> The fact that adding a citizenship question goes beyond the constitutional intent of the decennial census could further exacerbate the undercount concerns for immigrant populations. For these reasons specific to the nature of the question, adding a citizenship question is very likely to undermine the census.

These concerns have been expressed by many prominent experts. Most recently, in his March 1 memo to Secretary Ross,<sup>5</sup> Census Chief Scientist and Associate Director for Research and Methodology John Abowd stated the addition of the citizenship question would have “negative cost and quality implications” and “would result in poorer quality citizenship data” than a much less costly and less burdensome alternative using administrative data. Further, six former census directors who served under Democrat and Republican administrations urged Secretary Ross not to add the question,<sup>6</sup> noting that it had not gone through the rigorous testing required for putting new questions on surveys and censuses. “It is highly risky to ask untested questions in the context of the complete 2020 Census design,” they said, observing that the effect of adding such a question at such a late date “would put the accuracy of the enumeration and success of the census in all communities at grave risk.”

Further, former Commerce Secretaries Penny Pritzker and Carlos Gutierrez expressed<sup>7</sup> their “grave concerns about the proposed addition of a citizenship question to the decennial census in 2020,” saying the “question will put in jeopardy the accuracy of the data that the census

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<sup>4</sup> <https://www2.census.gov/cac/nac/meetings/2017-11/Meyers-NAC-Confidentiality-Presentation.pdf>

<sup>5</sup> <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=1320>

<sup>6</sup> [https://www.washingtonpost.com/r/2010-2019/WashingtonPost/2018/03/27/Editorial-Opinion/Graphics/DOJ\\_census\\_ques\\_request\\_Former\\_Directors\\_ltr\\_to\\_Ross.pdf?tid=a\\_mcctx](https://www.washingtonpost.com/r/2010-2019/WashingtonPost/2018/03/27/Editorial-Opinion/Graphics/DOJ_census_ques_request_Former_Directors_ltr_to_Ross.pdf?tid=a_mcctx)

<sup>7</sup> <https://www.bloomberg.com/view/articles/2018-04-04/u-s-census-is-not-about-citizenship>

collects, and increase costs.” Acting Census Director Ron Jarmin wrote in a December 22, 2017 email to a DOJ official that the Census Bureau’s preliminary analysis suggested the best way to obtain the desired DOJ data “would be through utilizing a linked file of administrative and survey data the Census Bureau already possesses,” concluding this approach “would result in higher quality data produced at lower cost.”<sup>8</sup>

More generally, adding a question at this late stage of the Census process does not allow time for adequate testing, particularly if the testing reveals substantial problems. The decennial census questionnaire development is a multi-year, highly technical process that goes through various rigorous quality and scientific checks of the questions and, as importantly if not more so, the accompanying materials, interviewer instructions, and the contact process. Much of this development and testing culminated in the full end-to-end dress rehearsal carried out in Providence, RI earlier this year.

Some have optimistically stated that the addition of the citizenship question for the 2020 census requires no testing. Indeed, Secretary Ross,<sup>9</sup> after noting prior decennial census surveys “consistently asked citizenship questions up until 1950” and the American Community Survey (ACS) has included a citizenship question since 2005, concludes, “[T]he citizenship question has been well tested.” Not only does this conclusion fail to recognize the many changes that have occurred in the census-taking process over the past 70 years; it also neglects the important differences between the ACS and decennial census—including in the accompanying materials, interviewer instructions, and contact process.

Beyond the testing standards discussed above, we maintain considerable justification is required before adding any question to ensure the quality of the decennial census would not be undermined. The addition of the citizenship question seems to be on questionable scientific grounding. In his March memo,<sup>9</sup> Secretary Ross concluded adding a citizenship question to the census will provide the Department of Justice (DOJ) accurate block-level data, but his claim is undermined by his own words in the same memo that non-citizens responding to ACS questions on citizenship inaccurately mark “citizen” about 30 percent of the time. Because of this inaccuracy rate, Census Chief Scientist Abowd indicated in his March 1 memo to Secretary Ross that his decided-upon approach—“Alternative D”—would yield only a minor improvement over the administrative record approach—“Alternative C”—and the marginal improvement comes at large expense, at great risk to the quality of the decennial census, and with burdening 100% of respondents with an additional question.

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<sup>8</sup> <https://www.documentcloud.org/documents/4616787-December-22-2017-Email-From-Ron-Jarmin.html#document/p1/a441604>

<sup>9</sup> [https://www.commerce.gov/sites/commerce.gov/files/2018-03-26\\_2.pdf](https://www.commerce.gov/sites/commerce.gov/files/2018-03-26_2.pdf)

We are also concerned by the lack of scientific justification provided by the Department of Justice for why it needs the additional data and how it would use the information. It is particularly perplexing that DOJ on two previous occasions, as part of the well-established decade-long process leading up to the decennial census, cited its satisfaction with the data provided them by the Census Bureau. In a June 25, 2014 letter<sup>10</sup> to Department of Commerce General Counsel Kelly Welsh, DOJ official Arthur Gary affirmed the questions asked in the American Community Survey (ACS) were relevant and did not cite any inadequacy of the ACS data for DOJ purposes. In 2016 correspondence to the Census Bureau, Gary stated that DOJ had no need to amend the current content and uses or to request new content in the ACS for the 2020 census. (Gary later wrote to request that the Census Bureau consider a new topic in the ACS relating to LGBT populations.<sup>11</sup>)

We continue to urge the citizenship question not be included “unless there is convincing evidence its impact will be minimal.”<sup>3</sup> In his memo announcing the decision however, Secretary Ross states no one “could document that the response rate would in fact decline materially” due to the addition of a citizenship question. While it is true we have little experience and testing on this specific change, Secretary Ross ignores the expert opinion of the broad scientific community involved with survey and questionnaire research, which includes government, industry, and academic scientists. As LaVange urged in January,<sup>3</sup> the burden of proof should be to show minimal impact of adding this question because of the risks of an undercount and the questionable justification for the question.

The ASA has strong confidence in the professionals at the U.S. Census Bureau, including in its most capable, talented, and strong leadership. Activities to modernize the Bureau and the census in this decade are commendable and will help to reduce respondent burden and save taxpayer dollars while setting the foundation for an effective decennial in 2020. Jeopardizing these accomplishments by adding a citizenship question at this late stage will likely result in a lower response rate, more non-participation, and ultimately a sharp increase in costs for non-response follow-up.

Questions on this document can be directed to the ASA Director of Science Policy Steve Pierson, [pierson@amstat.org](mailto:pierson@amstat.org).

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<sup>10</sup> <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=290>

<sup>11</sup> <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=323>