



AMERICAN STATISTICAL ASSOCIATION
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July 13, 2020

The Honorable Wilbur Ross
US Department of Commerce
1401 Constitution Ave. NW
Washington, DC 20230

Dear Secretary Ross,

I write to request your leadership in maintaining public trust in the US Census Bureau and ensuring the integrity of its data products. As you stated in [confirmation hearing comments](#), “Data the Department gathers and makes public, such as the Census data, the data that the BEA puts out, and NOAA’s reports, to name a few, are essential functions.” Given the immeasurable role of the US Census Bureau in our governance, commerce, society, and livelihoods and because of the US Census Bureau’s constitutionally created role in our democracy, ensuring the trust in the US Census Bureau and the integrity of its data are paramount.

As you know, the US Census Bureau is the federal government’s largest statistical agency. It conducts the decennial census and conducts or oversees countless other programs. To carry out its work effectively and ensure accurate and reliable data, the bureau must have the trust of the individuals and companies asked to fill out its questionnaires. To help ensure this trust, the bureau’s work is guided in statute by Titles 13 and 26 of the US Code, numerous other laws, and other safeguards. For example, before a question can be placed on a US Census Bureau questionnaire, it must pass through numerous checks, including that it serves a statistical purpose and does not duplicate data collection by other government programs or place too great a burden on respondents.

We acknowledge the administration’s right to gather citizenship information on our nation’s residents. However, we are very concerned that designating the Census Bureau as the agency to carry out the compilation, stewardship, and production of citizenship information through administrative records compromises public trust in and support of the bureau. Specifically, it is likely that the bureau’s collection of citizenship information through administrative data puts at

risk the agency's trust and data integrity, in part due to the potential for perceived comingling of statistical and law enforcement activities. Moreover, adding two political appointees at the highest levels to the Census Bureau at this time only exacerbates the risks of deteriorating the bureau's public trust and data integrity.

As Secretary of Commerce, you are responsible for protecting the integrity of the US Census Bureau, and I urge you to shift the responsibility for this activity to a non-statistical agency and have the US Census Bureau revert to the previous tested methods for reporting citizenship counts.

We would appreciate the opportunity to discuss this matter with you. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Santos", written in a cursive style.

Robert Santos
2021 ASA President

CC: Ms. Karen Dunn Kelley, Deputy Secretary, US Department of Commerce