



AMERICAN STATISTICAL ASSOCIATION

Promoting the Practice and Profession of Statistics®

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January 8, 2018

The Honorable Wilbur Ross
Secretary, United States Department of Commerce
1401 Constitution Ave., N.W.
Washington, DC 20230

Dear Mr. Secretary,

I write as president of the American Statistical Association concerning the Department of Justice's December 12 request that the Census Bureau add to the 2020 Census a question regarding citizenship. We strongly caution 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 believe there is very strong potential the quality of the census will be undermined.

As you know, the challenge of any census is maximizing the participation of all residents. In essence, it is critical to minimize the undercount, whether for geographic regions or for certain populations. While any undercount is concerning, a non-uniform undercount particularly penalizes geographic regions or demographic populations (e.g., children or under-represented minorities) that are more undercounted than others. A larger undercount, for example, in a state whose population is near a designated threshold could result in that state losing a Congressional seat. Maximizing census participation is particularly challenging in areas or among populations with distrust or suspicion of the government.

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, Census Bureau researchers report 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)."¹ The fact that adding a citizenship question goes beyond the constitutional intent of the decennial census

¹ <https://www2.census.gov/cac/nac/meetings/2017-11/Meyers-NAC-Confidentiality-Presentation.pdf>

could possibly 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.

More generally, adding a question at this late stage of the Census process does not allow time for adequate testing to incorporate new questions, particularly if the testing reveals substantial problems. Further, a new question undermines the validity of the extensive testing of the current questions carried out to date. The decennial census 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 testing culminates in the full end-to-end dress rehearsal that will be carried out in Providence, RI this year.

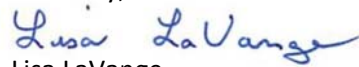
We believe the potential for a citizenship question to create problems argues strongly against its inclusion at this advanced stage. The most likely results will be a lower response rate, more non-participation, and ultimately a sharp increase in costs for non-response follow-up.

For the Department of Justice's enforcement of Section 2 of the Voting Rights Act, we respectfully suggest the issue be put to a panel of experts to assess the extent of the problem and to develop recommendations to address the issue with minimal impact on the work of the U.S. Census Bureau to fulfill its constitutional duty.

Mr. Secretary, we appreciate your leadership in assuring an effective census in 2020. Given the current environment that includes proposals such as that addressed in this letter, we ask you to reaffirm often over the next two years your commitment to an effective census, underscoring the many reasons that the U.S. Census Bureau can be trusted to keep confidential any data provided to it or its representatives.

Thank you for your consideration.

Sincerely,



Lisa LaVange

2018 President

American Statistical Association

Cc: John Michael Mulvaney, Director, White House Office of Management and Budget