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We Bring Value-Added Census Data and Education to the User

August 4, 2018

Jennifer Jessup
Department of Commerce, Room 6616
14th and Constitution Avenue NW
Washington, DC 20230
PRAcomments@doc.gov

Dear Ms. Jessup—

The Department has issued a request for comments concerning the 2020 Census design and data collection plan. (*Federal Register*, Vol. 83, June 8, 2018, pp. 26643-26653.)

I am writing on behalf of the National State Data Center (SDC) Steering Committee to offer our comments. The SDC network includes state government statistical agencies, state universities, and public-sector data-providers that partner with the Census Bureau. We partner with the Census Bureau to provide training, technical assistance, and extension of Census products in our states. The Steering Committee represents the interests of these organizations, and coordinates activities with the Census Bureau.

In reviewing the *Federal Register* notice and the proposed content of the 2020 Census questionnaire, our committee has concerns for the validity of the 2020 Census design. We find that some aspects of the proposed 2020 Census introduce unneeded risks. Specifically, we expect that the introduction of a citizenship self-response question will undermine the public participation, and compromise the accuracy of the decennial population counts.

Our network does *not* take a position on whether citizen population counts are needed in 2020 Census tabulations; that is a policy question for Congress to determine. However, there is a consensus in research and statistics professions that methods and processes matter: If a new citizenship data element is needed, then the processes to obtain and use such data should be thoughtfully planned, should maximize the accuracy and completeness of the 2020 Census, and should avoid introducing risks to validity.

Our concern is shared by experts within the Census Bureau who caution that a new citizenship self-response question will discourage noncitizens from census participation and will diminish accurate completion. As stated in a January 3, 2018, memo from John M. Abowd, Chief Scientist

and ADRM at Census Bureau: “There is good evidence that citizenship is accurately reported by citizens, but less accurately reported by household responders for noncitizens. This accuracy deficit in the self-responses may be due to the inherent difficulty of the respondent knowing the citizenship status of everyone in the household... It may also be due to the sensitivity of the citizenship question itself.” (<https://assets.documentcloud.org/documents/4617380/Abowd-memo.pdf>)

Abowd's January 3 memo concludes by recommending an approach that would avoid reliance on a citizenship self-response question. Instead, the “Alternative C” design would: “Add the capability to link an accurate, edited citizenship variable from administrative records to the final 2020 Census microdata files”; and use this “enhanced microdata” to tabulate block-level counts.

We find that a citizenship self-response question would depress response rates and necessitate greater effort and expense in field followup. The Census Bureau has reached the same conclusion, per a July 20 memo from John M. Abowd, but has not publicly shared the response rate impact projections.

Our committee agrees with the reasoning in Abowd's January 3 memo. The “Alternative C” approach would provide the most economical, complete and accurate citizenship enumeration possible, while avoiding the risks associated with self-response. Also, this approach is consistent with Census Bureau's broader strategy of substituting validated administrative records data – data that already exists – in place of self-response questions where such substitution reduces response burdens or mitigates asking sensitive questions. In the context of a decennial census, the risks associated with asking sensitive questions – risks of nonparticipation/refusal, incomplete questionnaires, deliberately misleading responses, and increased need for field followup – are not risks confined to the one or two sensitive questions, but are general risks to the accuracy of the decennial population counts.

Whether or not there is a citizenship self-response question in the 2020 Census, our committee recommends that the Bureau, in its enumeration data collection, should distinguish and prioritize those self-response questions that are most needed so that the 2020 Census can serve its major purposes. The 2020 Census needs to serve its Constitutional purpose (counting all residents) and needs to serve also as a valid data frame for the next decade of survey research happening throughout the nation.

If there will be a citizenship self-response question, we do not recommend citizenship status as a priority data element. Priority data elements should include a listing of all persons, their ages and sexes, and relationships within households and families.

We recommend that if 2020 Census questionnaires are returned with only priority questions answered, that those questionnaires should be deemed sufficiently complete. In other words, incompleteness of other data elements – those not prioritized – would not merit field followup. This will economize on the effort and expense of field followup operations.

Likewise, we recommend that the online (internet) census questionnaire system be implemented to accept information as sufficiently complete if only priority questions are answered. There will be census and survey participants who do not wish to identify their citizenship or other characteristics. The “skip logic” of the online census questionnaire system’s programming should not require the non-prioritized questions; the non-prioritized questions should not stand in the way of people submitting, and Census receiving, sufficiently complete returns submitted online.

Thank you for your attention to our comments. Our network members are partners of the Census Bureau and major users of decennial census data, and we are here to support the Bureau’s work. Our steering committee can be reached by email: todd.graham@metc.state.mn.us, or by US mail: Todd Graham, Metropolitan Council, 390 North Robert Street, St. Paul, MN 55101.

Sincerely,

A handwritten signature in black ink, appearing to read "Todd Graham".

Todd Graham
Chairman, Census SDC Steering Committee

cc: Allen Barnes, Arizona State Data Center
Gregg Bell, University of Alabama
Michael Moser, Vermont State Data Center
Suzan Reagan, Bureau of Business and Economic Research (New Mexico)
Pam Schenker, Florida Office of Economic and Demographic Research
Jenn Shultz, Pennsylvania State Data Center
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