

August 7, 2018

Ms. Jennifer Jessup
Departmental Paperwork Clearance Officer
Department of Commerce
Room 6616
14th and Constitution Avenue, NW
Washington, DC 20230

RE: Comments on Proposed Information Collection on 2020 Census, Docket No.
USBC-2018-0005

Dear Ms. Jessup:

The Schuyler Center for Analysis and Advocacy is a 145-year-old statewide, nonprofit, nonpartisan organization dedicated to advancing New York State policies and funding that strengthen families, with a focus on children and families living in poverty. Schuyler Center recognizes that the key to child and family well-being lies in holistic, cross-sectoral policies. To thrive, families and children need economic security, quality physical and behavioral health care, and adequate nutrition, and access to quality education. Therefore, in our work, we focus considerable attention to coordinating and bringing systems together to achieve the best outcomes for New Yorkers.

I am writing on behalf of the Schuyler Center to offer comments on the 2020 Census proposed information collection.

As an organization dedicated to improving the lives of children and families, we are interested in a number of programs that would be directly impacted by an undercount in the census. Specifically, Medicaid, the Children's Health Insurance Program and the Child Care Development Block Grant, Foster Care Block Grant are all programs that improve the lives of the children in New York.

The Schuyler Center is deeply concerned about the issue of the high net undercount of young children in the Census, and submits these comments to identify the features of the proposed questionnaire and implementation process for the Decennial Census that will affect that undercount.

In our comments, the Schuyler Center

- Commends the Census Bureau for updating the language on the primary solicitation materials that most households will receive in 2020 to "...all adults, children, and babies living or staying at this address," instead of "...everyone living or staying at this address."

- Urges the Census Bureau to remove the question on citizenship status because of its probable significant reduction in the number of young children that will be counted, both immigrants and citizens.
- Requests that the Census Bureau revamp its communications research and outreach to include special attention to the undercount of young children.

The 2010 Census missed nearly one in ten children aged 0-4, or about 2 million children; the net young child undercount (after accounting for duplications) was nearly 5% or almost one million children.¹ Young children had by far the worst undercount of any age group. This trend of missing young children has been growing over the last several Decennial Censuses even as our ability to count other age groups has improved.²

Even worse, the children that are missed most often are children of color.³ Thus, children who are already disproportionately poor, vulnerable and most in need of strong communities and services are likely to get less than their fair share of federal and state dollars and adequate services in their communities.

Young children are generally undercounted for many reasons, including:

- Almost 4.5 million children under age five live in hard-to-count neighborhoods.⁴
- It is widely believed that poor households are difficult to enumerate,⁵ and young children have a higher poverty rate than any other age group.
- Some young children may go uncounted because they live in large and complex households. In 2010, nearly a quarter of young children lived in households of six or more people.
- Some young children have complicated living arrangements, moving often among various relatives or caregivers. Foster children, children living with grandparents or other relatives, and children whose parents are cohabiting but not married are also more likely to be missed. A recent study found 40 percent of all children under age five lived in a household with complex living arrangements.⁶ The figures are higher for Black children (50 percent) and Latino children (55 percent). Young children in complex households may be left off the Census questionnaires because respondents are uncertain of whether or not to include a young child as a household resident.⁷
- Language barriers also contribute to the undercount of young children in households where people speak a language other than English. In 2010, one-quarter of young Latino children lived in a linguistically isolated household where adults had difficulty speaking English.⁸ It is shown that language limitations cause respondents to report in error on the census questionnaire.⁹

The undercount of young children has a number of serious consequences for children, and many of those consequences last for at least a decade (for most of their childhood), including:

- less representation in Congress, state legislation, and school boards for communities with high numbers of young children;
- less federal funding for critical children's programs in states and particularly in the hard-to-count communities;

- inadequate data and planning information for policymakers and advocates for services such as adequate school capacity and community health services; and
- distorted data in all Census surveys for the next decade, since the Census Bureau uses population data from the Census (the only product which is not a survey but rather an all-population count) and annual population estimates based on the Decennial Census to develop the sampling design and weighting for all its surveys.

Every year, more than \$53B in federal funds is allocated to New York and localities based on census data, either directly or through Census population estimates and Census surveys that in turn rely on the Decennial Census.¹⁰ Here are some of the programs that the Schuyler Center works with New York policymakers to implement. These programs, which funding is based in whole or in part on census data, affect children's lives in our state. (Unless noted, figures are for fiscal year 2015.)¹¹

- **Child Care and Development Block Grant (CCDBG)– \$198M.** CCDBG helps low-income families who are working, participating in training or education programs, or looking for work afford child care and supports activities that improve the quality of care for all families. State funds are allocated based on numbers of children under 13 and state median income, so an undercount of young children would reduce the state's child care funding.
- **Children's Health Insurance Program (CHIP) – \$972M.** CHIP provides subsidized health coverage to children in low-income families. The federal government pays most of the costs of the program, and the federal share of the costs varies by state using an enhanced match based on the Federal Medicaid Assistance Percentage (FMAP). CHIP covers over **762,000 children in our state**.¹² If many children in poverty are missed in the Census in a state, then the FMAP will be affected and the share of CHIP reimbursements paid by the federal government will not be accurate for the state's needs.
- **Foster Care – \$404M.** The Federal Foster Care Program helps to provide safe and stable out-of-home care for almost 20,000 children in our state until they are safely returned home, permanently placed with adoptive families, or placed in other planned arrangements for permanency.¹³ An undercount of young poor children would result in a higher total per capita income in a state, and that in turn would result in a lower Federal Medicaid Assistance Percentage, and thus lower reimbursements for care for children in foster care. That tends to affect the level of services available for children.
- **Medicaid – \$32B.** Medicaid is a federal-state program that provides health coverage for people with low incomes. It covers an array of services including prenatal care, well-child visits, developmental screenings, and treatment for illness and disease.¹⁴ Almost¹⁵ Medicaid enrollees in our state are children.¹⁶ The federal government pays for 50% of the costs of Medicaid. The FMAP is the formula by which the federal government's share of a state's Medicaid costs is calculated. A Decennial Census undercount of a state's population would result in a higher Per Capita Income in the FMAP formula and consequently, a lower reimbursement rate.

The consequences of an undercount go far beyond the financial, however. If many young children are missed, school demographers will not know which areas need to

build schools or add classrooms for when these children enter school, creating overcrowded classrooms and a lower quality of education for children who live in areas with many uncounted children. Health centers and other medical resources are allocated based on the number of people and poor people in a community, with new centers being built or old ones being closed. An undercount of young children will mean inadequate medical resources in the community. Businesses use Census data for planning where to put new enterprises; if a local community is undercounted, that may result in, for example, no business being willing to start a grocery store there and people having less access to healthy food.

For all these reasons, it is very important that the Census questionnaire and collection procedures are designed to ensure a full and fair count of young children. Accordingly, we wish to comment on two aspects of the Census questionnaire and an aspect of Decennial Census process.

First, we thank the Census Bureau for altering the wording on the 2020 Census form in an effort to accurately count young children that have long been undercounted. We think this is an important first step, although by no means enough without further action.

Second, we urge the Department of Commerce to remove the citizenship question from the 2020 Census form, as it will contribute to an already troubling young child undercount—an outcome that the nation will have to live with for the next 10 years.

The risk of a significant young child undercount in the 2020 Decennial Census is even greater now that millions of immigrant families are likely to be afraid to respond to the Census because it will include a question on citizenship. Even before the citizenship question was added, Census staff were warning that the charged political environment would make it harder to persuade people to fill out the Census.¹⁷ If the Census form actually asks about citizenship status, that effect will be much stronger.

This operates in at least three ways.

- In the current political environment, families are afraid to do anything that would draw attention to an undocumented family member. They are afraid that their family will be separated forever, and they assume that information available to one branch of the government may become available to another part. Some 6.4 million children (about 9% of all US children) live in mixed status families with at least one undocumented member.¹⁸ Of those children, 1.9 million are under age 5.
- Adding a citizenship question means that many of those children will be missed in the Census, because the family will be afraid to fill out the census form at all.
- Moreover, in the current political environment, even immigrants that have green cards or other documentation authorizing their presence in the country may be afraid to fill out the citizenship question and the census. They may fear that policies will change and even legal permanent residents will be at risk. This means that adding a citizenship question also means that 11% of all children age five or under (about 2.6 million children nationwide) are also at risk of not being counted.

- Finally, there are increasing suggestions from the administration that they will scrutinize naturalized citizens to see if their citizenship should be revoked. This means that some fraction of the households where children live with naturalized citizen parents, which includes 7% of all children age 5 or younger, or about 1.7 million young children nationwide, may also decide not to fill out the Census form. While the impact is likely to be less severe in this third group, it is still likely to depress the count of young children to some extent.

According to the Census Bureau's 2016 American Community Survey only 1.3 percent of the population age 0 to 4 are not citizens.¹⁹ The Constitution requires that every child (and every person) living in the US should be counted, but it's noteworthy that the potential consequences of this question reach far beyond immigrants to harm young citizen children by reducing their access to the services and benefits they need to become productive healthy adults. The likely reduced response rate from the proposed citizenship question will create a severe, negative effect on programs vital to children and families. Any child living in an area with high numbers of immigrants will suffer because the area will not get the resources it deserves.

While these reasons are unique to young children, there are other reasons to remove the citizenship question. The question is untested, so we have no idea how families will interpret it and how that will affect their reporting. For example, at the June 2018 Census Bureau's National Advisory Committee meeting it was revealed that some members of native American tribes will report themselves as noncitizens, even though they are citizens legally, because they consider themselves citizens of their tribe. Because the question is untested, we have no idea how other communities might understand and reply to the question, or how that might affect reporting on young children. How will dual citizens respond to this question? How will parents who are immigrants respond about their child that is a dual citizen? We simply have no idea because the question is untested. According to John Abowd from the U.S. Census Bureau, including the question risks providing misleading and inaccurate data.²⁰

Moreover, the overall costs to taxpayers of adding an untested question this late in the process to taxpayers is significant. According to the Census Bureau, every one 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.²¹ In addition to the added costs of nonresponse rates, there is the additional costs of printing larger questionnaires, re-programing the online census instrument and the ²²increased costs of processing more data. A five percent drop in self response would add an additional, unplanned \$275 million to the census.

We also wish to comment on the Census Bureau process for researching messages and developing materials to help persuade families with young children to fill out the census.

While the Bureau conducted over 40 focus groups with many different groups at risk of being undercounted in the Census Barriers, Attitudes and Motivators Survey (CBAMS), not a single focus group included parents and caregivers of young children, even though in 2010 this was the group with the biggest absolute undercount. ²³ Moreover, the Census Barriers, Attitudes and Motivators Survey (CBAMS) survey of 50,000 people did not ask any questions specific to parents and caregivers of young

children, although it did identify which respondents had young children in their households.²⁴ We urge the Bureau to conduct research to address these shortcomings by focusing specifically on families with young children that live in hard to count areas or have some of the factors described above that particularly put children at risk of not being counted, such as living in complex families. We also urge the Bureau to investigate what kind of messengers families with young children are most likely to trust, particularly around issues related to children. We also ask the Bureau to research whether families of young children trust and rely on faith leaders, child care and preschool staff, social service agency staff, and medical staff—the four groups that we think families with young children most consistently encounter. We ask them to research which media sources these families pay attention to, including print, TV, radio, and a variety of social media. Finally, we encourage them to design their outreach campaigns to include the messengers and the media outlets that families with young children are most likely to hear and to trust.

We believe a full, fair, and accurate census must include a count of everyone living in this country, including its youngest members. As advocates that use Census data to assess the well-being of children and identify policy changes, we know that policy makers need reliable, useful, objective data about our nation's people, housing, economy, and communities. A nationwide census that counts every person is required by the Constitution. It is integral to our democracy because it ensures that district lines and political power are fairly drawn and allocated. It is fundamental to the federal government's formulas for distributing at least \$800 billion annually in federal assistance to states, localities, and families. It is essential to guide important community decisions affecting schools, housing, health care services, business investment, and much more.

A full, fair, and accurate census is absolutely critical for our country and our communities. It will shape the lives of our youngest children at the most critical points in their development. For the reasons discussed above, we strongly oppose asking about citizenship status in the 2020 Census and urge the Department of Commerce to remove the proposed citizenship question from the data collection forms. We also ask the Department to expand its communications efforts to include a thorough investigation of and implementation of the best methods for persuading families with young children to complete the Census.

Sincerely,



Kate Breslin, MPH, MCRP
President and CEO

¹KIDS COUNT Data Book 2018, <http://www.aecf.org/m/resourcedoc/aecf-2018kidscountdatabook-2018.pdf> citing <https://www2.census.gov/programs-surveys/decennial/2020/program-management/memo-series/2020-report-2010-undercount-children-ommissions.pdf>

² The Undercount of Young Children, 2014, <https://www.census.gov/content/dam/Census/library/working-papers/2014/demo/2014-undercount-children.pdf>

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- ³ O'Hare, W.P. (2015). *The Undercount of Young Children in the U.S. Decennial Census*, Springer Publishers.
- ⁴ KIDS COUNT Data Book 2018, <http://www.aecf.org/m/resource/doc/aecf-2018kidscountdatobook-2018.pdf> citing U.S. Census Bureau, 2012–16 American Community Survey.
- ⁵ Fernandez, L., Shattuck, R. and Noon, J. (2018), *The Use of Administrative Records and the American Community Survey to Study the Characteristics of Undercounted Young Children in the 2010 Census*, U.S. Census Bureau Center, CARRA Working Paper Series. Working Paper Series #2018 – 05, U.S. Census Bureau, Washington, DC.
- ⁶ Jensen, E. (2017) Presentation at the Children's Leadership Council – Census Bureau meeting, April 13, 2017, Washington DC.
- ⁷ O'Hare, W.P. (2015) *The Undercount of Young Children in the U.S. Census*, Springer Publishers, Page 95.
- ⁸ U.S. Census Bureau (2017). *Investigating the 2010 Undercount of Young Children – A Comparison of Demographic, Housing, and Household Characteristics of Children by Age*, January 18, 2017.
- ⁹ U.S. Census Bureau (2017). *Investigating the 2010 Undercount of Young Children – A Comparison of Demographic, Housing, and Household Characteristics of Children by Age*, January 18, 2017.
- ¹⁰ *Counting for Dollars 2020, The Role of the Decennial Census in the Geographic Distribution of Federal Funds Report #2: Estimating Fiscal Costs of a Census Undercount to States*, <https://gwipp.gwu.edu/sites/g/files/zaxdzs2181/f/downloads/GWIPP%20Reamer%20Fiscal%20Impacts%20of%20Census%20Undercount%20n%20FMAP-based%20Programs%2003-19-18.pdf>.
- ¹¹ *Counting for Dollars 2020: The Role of the Decennial Census in the Geographic Distribution of Federal Funds, Initial Analysis: 16 Large Census-guided Financial Assistance Programs* <https://gwipp.gwu.edu/sites/g/files/zaxdzs2181/f/downloads/United%20States%2008-18-17.pdf> and <https://gwipp.gwu.edu/sites/g/files/zaxdzs2181/f/downloads/Special%20Ed%20IDEA%20CFD%2008-18-17.pdf>.
- ¹² *Unduplicated Number of Children Ever Enrolled in CHIP and Medicaid*, <https://www.medicaid.gov/chip/downloads/fy-2017-childrens-enrollment-report.pdf> and <https://gwipp.gwu.edu/sites/g/files/zaxdzs2181/f/downloads/S-CHIP%20CFD%2008-18-17.pdf>.
- ¹³ KIDS COUNT Data Center, <https://datacenter.kidscount.org/data/tables/6243-children-in-foster-care#detailed/1/any/false/870,573,869,36,868,867,133,38,35,18/any/12987>. This is point-in-time data, and the total number of children served in foster care over the course of a year is higher.
- ¹⁴ Kayla Patrick, Jasmine Tucker & Amy Matsui, *By the Numbers: Data on Key Programs for the Well-Being of Women & Their Families 2* (June 2018), available at <https://nwlc-ciw49tixgw5lbab.stackpathdns.com/wp-content/uploads/2018/06/FINAL-By-The-Numbers.pdf>.
- ¹⁵ *Unduplicated Number of Children Ever Enrolled in CHIP and Medicaid*, <https://www.medicaid.gov/chip/downloads/fy-2017-childrens-enrollment-report.pdf>.
- ¹⁶ *Policy Basics: Introduction to Medicaid*, <http://www.cbpp.org/research/health/policy-basics-introduction-to-medicaid>.
- ¹⁷ MEMORANDUM FOR Associate Directorate for Research and Methodology (ADRM), <https://www2.census.gov/cac/nac/meetings/2017-11/Memo-Regarding-Respondent-Confidentiality-Concerns.pdf>.
- ¹⁸ Source: Pew Research Center tabulations of augmented 2015 American Community Survey (IPUMS). See Passel and Cohn (2017) for details on methodology. <http://www.pewhispanic.org/2016/09/20/overall-number-of-u-s-unauthorized-immigrants-holds-steady-since-2009/>.
- ¹⁹ Calculated from the IPUMS system at the University of Minnesota.
- ²⁰ Census Bureau's chief scientist warned secretary in memo against adding citizenship question, <http://thehill.com/homenews/administration/391527-census-bureau-official-warned-in-memo-against-adding-citizenship> citing <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>.
- ²¹ 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.
- ²³ U.S. Census Bureau (2018) 2020 Census Quarterly Management Review, April 10, 2018, Presentation on National Partnerships.
- ²⁴ Walejko, G. (2018) Presentation at the Children's Leadership Council Slide 12 – Census Bureau meeting, June 8, 2018, Washington DC.