

August 7, 2018

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



YWCA USA
1020 19th Street, NW
Suite 750
Washington, DC 20036
P 202.467.0801
F 202.467.0802
ywca.org

Submitted electronically

RE: Docket USBC-2018-0005 Census Bureau, Proposed Information Collection; 2020 Census

Dear Ms. Jessup,

On behalf of YWCA USA and our vibrant national network, I am pleased to submit comments on the proposed changes to the 2020 Census information collection, published at 83 FR 26643 (June 8, 2018). **YWCA urges the Department of Commerce to remove the proposed citizenship question from the 2020 Census form.**

A full, fair, and accurate census, and the collection of useful, objective data about our nation's people, housing, economy, and communities, is vitally important to the strength and stability of our nation, and to the strength and vitality of YWCA and other nonprofit organizations that receive federal funding to provide domestic violence, child care, housing, nutrition, health, and other critical services in communities throughout the United States. Moreover, a full, fair, and accurate census is vital to the women, girls, and families who access federally-supported, life-saving services offered by YWCA, many of whom are from low income communities and communities of color that are historically hard to count.

As detailed more fully in these comments, inclusion of the proposed citizenship question will jeopardize the fairness and accuracy of the of the 2020 count by deterring individuals from hard to count communities from responding to the Census. The resulting undercount of persons will, in turn, negatively impact federal funding allocations for a wide array of domestic and sexual violence, child care, housing, nutrition, health, and other critical programs and services, leaving non-profit organizations and public service

agencies without the resources to address the scope and severity of need in their communities.

YWCA is particularly concerned about the negative impact that inclusion of a citizenship question will have on survivors of domestic and sexual violence, as well as on the non-profit sector that provides shelter, safety, and support to them. With fewer resources allocated to communities hardest hit by predicted undercounts, which we fear may only become more severe in the 2020 Census, the tremendous strides that have been made in meeting survivor needs and in preventing sexual and domestic violence are jeopardized – leaving women and children at greater risk of violence, with life-long implications for their health, well-being, and economic security. Similarly, we are concerned about the impact that inclusion of a citizenship question will have on children, people of color, low income families, immigrant communities, and other historically marginalized groups.

Combined, and in specific response to the formal Request for Comments on four questions (Section IV of the notice), these concerns make clear that inclusion of a citizenship question does not have practical utility; will increase the cost of the 2020 Census significantly but unnecessarily; and will undermine rather than enhance the quality, utility, and clarity of the information to be collected.

YWCA relies on census-derived programs to serve communities.

Founded 160 years ago, YWCA is one of the oldest and largest women’s organizations in the United States and is dedicated to eliminating racism, empowering women, and promoting peace, justice, freedom and dignity for all. Today, we serve over 2 million women, girls, and their families through a network of 210 local YWCA associations in over 1,300 communities across 46 states and the District of Columbia. Across this vibrant network, we are proud to provide:

- 535,000 women, children and families with gender-based violence support services, which include domestic violence and sexual assault programs and services (e.g., emergency shelter, crisis hotlines, counseling and court assistance, and other community safety programs) that are supported through the Violence Against Women



YWCA USA

1020 19th Street, NW
Suite 750
Washington, DC 20036

P 202.467.0801

F 202.467.0802

ywca.org



YWCA USA

1020 19th Street, NW
Suite 750
Washington, DC 20036

P 202.467.0801

F 202.467.0802

ywca.org

Act (VAWA), the Family Violence Prevention and Services Act (FVPSA), and the Social Services Block Grant (SSBG)

- 170,000+ children and parents with childcare, teen and parenting programs, which include child care programs supported through Head Start, Early Head Start, and the Child Care and Development Block Grant (CCDBG)
- 145,000 women, children and families with housing, food assistance and immigrant assistance programs[CB1], which include child care, shelter, and after school programs that are supported through the Child and Adult Care Food Program (CACFP), the Supplemental Nutrition Assistance Program (SNAP), Emergency Food and Shelter Grants, the National School Lunch Program, Emergency Solutions Grants, Community Development Block Grants (CDBG), and other federal programs.

In addition, many of the women, girls, and family members who access YWCA services also access direct federal assistance that is impacted by the Census count. Across the YWCA network, some 72 percent of program participants live at or below the federal poverty line, making them eligible for a wide range of federal programs whose annual budget allocation is determined in whole or in part by reference to Census data. These programs include Medicaid, SNAP, the Federal Pell Grant Program, the Special Supplemental Nutrition Program for Women, Infants and Children (WIC), Section 8 Housing Assistance, the State Children’s Health Insurance Program, and more.

Because Census data is used to determine the distribution of federal funding for these vital services, YWCA and our constituents are directly impacted by and have a vested interest in the fairness and accuracy of the decennial Census count.

Inclusion of the proposed citizenship question will deter individuals from “hard to count communities” from responding to the Census.

As detailed by the Census Bureau National Advisory Committee’s Administrative Records, Internet, and Hard to Count Population Working Group, population groups that historically have been hard to count in the Census include: racial and ethnic minorities; persons who do not speak English fluently; lower income persons; homeless persons; undocumented



YWCA USA

1020 19th Street, NW
Suite 750
Washington, DC 20036

P 202.467.0801

F 202.467.0802

ywca.org

persons; young mobile persons; children; persons who are angry at and/or distrust the government; and LGBTQ persons.¹

Some of these groups have been historically underrepresented in the census for decades; some may experience new or increased vulnerability due to major changes in methodology, such as relying on the internet as the primary way for households to respond to the 2020 Census; and some may be reluctant to respond due to concerns about data confidentiality.²

Growing distrust of the government³ may make it even harder to achieve a fair and accurate count – particularly in immigrant and other hard-to-count communities. The Census Bureau’s own research in 2017 [iv] ⁴found unprecedented concerns among immigrants and those living with immigrants about responding to census takers’ questions, due to fear that the information might be shared with other government agencies and used against them or their loved ones.

Inclusion of a citizenship question will exacerbate these dynamics, making it even more complicated, costly and difficult to achieve a fair and accurate Census count. As others have documented extensively, Census Bureau staff have warned that adding the citizenship question will increase non-response rates for the 2020 Census, impairing the accuracy of the data and increasing costs. Academics, elected leaders from across the political aisle, and former Census Bureau directors have likewise warned against including a citizenship question.

YWCAs around the country provide programmatic services to numerous hard-to-count population groups who are at a higher risk of not being fully counted in the census. We are particularly concerned about the impact that inclusion of the proposed citizenship question will have on survivors of domestic and sexual violence, people of color, children, and immigrant communities.

Domestic violence and sexual violence victims rely on census-driven programs

¹ The Undercount of Young Children, 2014, <https://www.census.gov/content/dam/Census/library/working-papers/2014/demo/2014-undercount-children.pdf>.

² O’Hare, W.P. (2015). The Undercount of Young Children in the U.S. Decennial Census, Springer Publishers.

³ <https://news.gallup.com/opinion/polling-matters/221171/americans-perceive-government-2017.aspx>

⁴ <https://www2.census.gov/cac/nac/meetings/2017-11/Memo-Regarding-Respondent-Confidentiality-Concerns.pdf>

More than 500,000 women, girls and families receive domestic violence, sexual assault, trafficking, and violence prevention services through YWCA.

While programs that support basic economic security are of critical importance for everyone, they are particularly helpful for domestic violence and sexual assault victims. Domestic violence and sexual assault occur across the socio-economic spectrum; however, there are unique challenges and barriers at the intersection of these forms of violence and economic disadvantage:



YWCA USA

1020 19th Street, NW
Suite 750
Washington, DC 20036

P 202.467.0801

F 202.467.0802

ywca.org

- Significant numbers of low-income women are abused or assaulted, and the violence perpetrated against them can make it nearly impossible to climb out of poverty without timely support from public assistance programs.⁵
- Domestic violence and sexual assault can result in victims falling into poverty, either because the domestic violence itself included financial abuse or because the consequences of abuse or assault have undermined the victim's ability to work, maintain their housing, or otherwise access financial security.
- Poverty and economic instability can exacerbate the physical health, mental health, and financial impacts of domestic violence and sexual assault due to, for example, lack of access to affordable counseling and health services, transportation, and/or legal assistance.⁶

Further, the links between homelessness and domestic and sexual violence are well-established and make clear that survivors of domestic and sexual violence are at significant risk of being undercounted in the 2020 Census.⁷ Experiences of trauma (especially domestic violence) are one of the major causes of homelessness for children in the U.S., and trauma frequently

⁵ See, e.g., Eleanor Lyon, *Welfare, Poverty and Abused Women: New Research and its Implications*, National Resource Center on Domestic Violence (Oct. 2000), available at <https://vawnet.org/material/welfare-poverty-and-abused-women-new-research-and-its-implications>; Mary Kay, Inc. (2012). *2012 Mary Kay Truth About Abuse Survey Report*. Dallas, TX. At: http://content2.marykayintouch.com/public/PWS_US/PDFs/company/2012Survey.pdf; Lyon, E., Lane, S., & Menard, A. (2008). Meeting Survivors' needs: A multi-state study of domestic violence shelter experiences. Washington, DC: National Institute of Justice. At: http://www.vawnet.org/Assoc_Files_VAWnet/MeetingSurvivorsNeeds-FullReport.pdf; Lyon, E., Bradshaw, J., & Menard, A. (2011). *Meeting Survivors' Needs through Non-Residential Domestic Violence Services & Supports: Results of a Multi-State Study*. Harrisburg, PA: National Resource Center on Domestic Violence. At: http://www.vawnet.org/Assoc_Files_VAWnet/DVServicesStudy-FINALReport2011.pdf; Kimerling, R., Alvarez, J., Pavao, J., Mack, K. P., Smith, M. W., & Baumrind, N. (2009). *Unemployment Among Women: Examining the Relationship of Physical and Psychological Intimate Partner Violence and Posttraumatic Stress Disorder*. *Journal of Interpersonal Violence*.

⁶ *Id.*

⁷



YWCA USA

1020 19th Street, NW
Suite 750
Washington, DC 20036

P 202.467.0801

F 202.467.0802

ywca.org

precedes and prolongs homelessness for children and families.⁸ The Census Bureau’s own working group identified homeless individuals among the population groups that will be hard to count through planned methods of online data collection.⁹

In 2016, families with children experiencing homelessness accounted for 35 percent¹⁰ of the estimated 3.5 million people who experience homelessness annually in the United States.¹¹ Among mothers with children experiencing homelessness, more than 80 percent had previously experienced domestic violence.¹²

Increased vulnerability to homelessness is well-documented among persons experiencing domestic violence, particularly among women and children with limited economic resources. For example:¹³

- As many as 57 percent of all homeless women report that domestic violence was the immediate cause of their homelessness;
- Thirty-eight percent of all domestic violence victims become homeless at some point in their lives;
- Higher prevalence of housing and food insecurity have been documented among individuals who have experienced rape, physical violence, or stalking by an intimate partner; and
- Experiences of trauma (especially domestic violence) are one of the major causes of homelessness for children in the U.S., and trauma frequently precedes and prolongs homelessness for children and families.

The Census Bureau’s own working group identified homeless individuals among the population groups that will be hard to count through planned

⁸ See “Domestic Violence and Homelessness: Statistics (2016)” and citations therein. <https://www.acf.hhs.gov/fysb/resource/dv-homelessness-stats-2016>.

⁹ “Final Report, National Advisory Committee on Racial, Ethnic, and Other Populations: Administrative Records, Internet, and Hard to Count Population Working Group,” 2016. Available at https://www2.census.gov/cac/nac/reports/2016-07-admin_internet-wg-report.pdf.

¹⁰ Goldvale, Casey and Indi Dutta-Gupta. “Counting Everyone in the Digital Age.” Leadership Conference Education Fund and Georgetown Center on Poverty and Inequality, 2017. Available at http://www.georgetownpoverty.org/wpcontent/uploads/2017/10/LCEF_2020_Census_Poll_Report-Final-002.pdf.

¹¹ “The 2016 Annual Homeless Assessment Report.” U.S. Department of Housing and Urban Development, November 2016. Available at <https://www.hudexchange.info/resources/documents/2016-AHAR-Part-1.pdf>.

¹² See “Domestic Violence and Homelessness: Statistics (2016)” and citations therein. <https://www.acf.hhs.gov/fysb/resource/dv-homelessness-stats-2016>

¹³ *Id.*



YWCA USA

1020 19th Street, NW
Suite 750
Washington, DC 20036

P 202.467.0801

F 202.467.0802

ywca.org

methods of online data collection.¹⁴ The transitory status of homeless individuals contributes to this difficulty.

Moreover, given the precarious situation that survivors of domestic and sexual violence face when they leave their abusers and the life-or-death consequences they face if their safety is compromised, many are reluctant to share information about who and where they are for fear of being discovered by their abuser. Community providers have traditionally played a critical role as trusted figures to help encourage Census participation among this vulnerable group. However, inserting a citizenship question into the context of fear and uncertainty that survivors of domestic and sexual violence face has increased concerns about the privacy and security of the information that is collected and will only exacerbate the reluctance of community providers and survivors of domestic and sexual abuse to participate in the 2020 count.

The Census Bureau's reliance on alternative data collection methods like the Service Based Enumeration (SBE) operation is unlikely to bridge the undercount gap for people experiencing homelessness who are also survivors of domestic and sexual violence. The SBE counts people who are experiencing homelessness at the places where they receive services. The 12th Annual Domestic Violence Counts Census Report in 2017 makes clear that the SBE will not produce an accurate count, as there remains a significant gap between domestic violence funding and demand for services. Notably, the annual 24-hour survey of domestic violence programs across the nation reported that while 72,245 adults and children found refuge and help on the survey day, victims made 11,441 requests for services – including emergency shelter, housing, transportation, childcare, legal representation, and more – that *could not* be provided because programs lacked the resources to meet victims' needs. Sixty-five percent (7,416) of those unmet requests were for housing,¹⁵ leaving the SBE as an inadequate means of ensuring that survivors of domestic and sexual violence who are experiencing homelessness are fairly and accurately counted in the 2020 Census.

Domestic and sexual violence victims who live at or below the federal poverty level are often eligible for a wide range of federal programs whose annual budget allocation is determined in whole or in part by reference to Census

¹⁴ "Final Report, National Advisory Committee on Racial, Ethnic, and Other Populations: Administrative Records, Internet, and Hard to Count Population Working Group," 2016. Available at https://www2.census.gov/cac/nac/reports/2016-07-admin_internet-wg-report.pdf.

¹⁵ National Network to End Domestic Violence. (2017). Domestic Violence Counts: 12th Annual Census Report (2017). Retrieved 1 August 2017 from <https://nnev.org/content/domestic-violence-counts-12th-annual-census-report/>.



YWCA USA

1020 19th Street, NW
Suite 750
Washington, DC 20036

P 202.467.0801

F 202.467.0802

ywca.org

data. A 2017 survey of service providers working with victims of violence,¹⁶ underscored the extent to which domestic and sexual violence victims relied on public benefits programs such as TANF, SNAP (food stamps), childcare, and others to help address their basic needs and to establish safety and stability.

Survivors of domestic and sexual violence will be particularly hard-hit by an inaccurate 2020 Census count, as will the nonprofit sector that provides shelter, safety, and support to them:

- Among the 132 federal programs that use Census Bureau data to distribute billions in funding each year are key federal funding streams that are distributed to states and tribes to provide safety, shelter, food, and other services to victims of sexual assault and domestic violence. These include Family Violence Prevention and Services/Grants to States, Territories and Tribes for Domestic Violence Services; Violence Against Women Formula Grants; Rural Domestic Violence, Dating Violence, Sexual Assault, and Stalking Assistance Program; Preventive Health and Health Services Block Grants; the Child and Adult Care Food Program; the Emergency Food Assistance Program; and the Emergency Shelter Grants Program.

Undercounting of this vulnerable population in the 2020 Census will result in lower funding levels for these essential federal funding streams, thereby undermining the considerable progress that has been made in preventing domestic and sexual violence and addressing the needs of survivors.

People of Color:

Almost half of participants in YWCA programs (46 percent) are people of color: 21 percent are Black; 14 percent are Latinx; 4 percent are bi/multi-racial; 3 percent are Asian/Asian American; 2 percent are Native American/Alaskan; 1 percent are Arab/Middle Eastern; and 1 percent are Native Hawaiian/Pacific Islander. In addition, 37 percent are White, and 17 percent are of unknown race/ethnicity.

Communities of color are at particular risk of being undercounted in the 2020 census. Black, Latinx, Asian American and Pacific Islander,¹⁷ American Indian

¹⁶ Goodman, S. *The Difference Between Surviving and Not Surviving: Public Benefits Programs and Domestic and Sexual Violence Victims' Economic Security* (Jan. 2018), available at <https://vawnet.org/material/difference-between-surviving-and-not-surviving-public-benefits-programs-and-domestic-and>

¹⁷ Asian Americans Advancing Justice – AAJC, “2020 Census: Examining Cost Overruns, Information Security, And Accuracy,” Testimony before the Senate Committee On Homeland Security And Governmental Affairs, Oct. 31, 2017, at <https://advancingjustice-aaajc.org/sites/default/files/2017-11/Advancing%20Justice%20AAJC%20statement%20for%20Senate%20HSGAC%20hearing%20Oct%2031%202017.pdf>.



YWCA USA

1020 19th Street, NW
Suite 750
Washington, DC 20036

P 202.467.0801

F 202.467.0802

ywca.org

and Alaska Native,¹⁸ and other marginalized populations have been historically undercounted in the decennial census, disadvantaging their families, communities, and neighborhoods. Factors that have been identified as contributing to undercounting of communities of color include:

- **Poverty:** Low income households in economically disadvantaged areas have been historically hard-to-count and are more likely to include people of color.
- **Housing Insecurity:** Individuals and families who rent are undercounted at higher rates than homeowners. This has been noted as challenge for accurately counting Black households, 58 percent of whom are renters, and Arab Americans, 50 percent of whom are renters.
- **Language Barriers:** Racial and ethnic subgroups with low rates of English proficiency have been undercounted in past Census counts. This is noted as a factor that specifically impacts Hispanic, Asian, and Arab American households, among others.
- **Immigration Status:** The rise in negative political rhetoric and federal detention and deportation operations targeting the undocumented community place immigrant households at greater risk of being undercounted.

On top of these contributing factors – which remain a source of concern as the 2020 count approaches – the Census Bureau’s own National Advisory Committee on Racial, Ethnic, and Other Populations noted that the shared experiences of discrimination and unequal treatment among racial and ethnic subgroups can lead to distrust of government and apprehension about responding to federal questionnaires contribute to undercounting of racial and ethnic subgroups.¹⁹

The addition of a new citizenship question that is untested for a decennial census is widely expected to exacerbate this distrust and apprehension, thereby jeopardizing census accuracy by deterring many individuals from communities of color—already “hard-to-count”—from responding.

¹⁸ Census Bureau, “Tribal Consultation Handbook: Background Materials for Tribal Consultations on the 2020 Census,” Fall 2015, at https://www.census.gov/content/dam/Census/library/publications/2015/dec/2020_tribal_consultation_handbook.pdf.

¹⁹ “Final Report, National Advisory Committee on Racial, Ethnic, and Other Populations: Administrative Records, Internet, and Hard to Count Population Working Group,” 2016. Available at https://www2.census.gov/cac/nac/reports/2016-07-admin_internet-wg-report.pdf.



YWCA USA

1020 19th Street, NW
Suite 750
Washington, DC 20036

P 202.467.0801

F 202.467.0802

ywca.org

Children:

Across YWCA programs, 19 percent are girls who are 17 years or younger, and 11 percent are boys who are 17 years or younger. Among these children, 18 percent are under age five.

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.^{20[xi]} 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^{21. [xii]}

Even worse, the children that are missed most often are children of color.^{22[xiii]} Thus, children who are already disproportionately poor 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.

While we are pleased that language on the primary solicitation materials that most households will receive in 2020 has been updated to "...all adults, children, and babies living or staying at this address," instead of "...everyone living or staying at this address," we are concerned that inclusion of the citizenship question will contribute to an already troubling young child undercount – an outcome that will have implications 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.^{23[xiv]} If the Census form actually asks about citizenship, that effect will be much stronger.

This operates in at least three ways.

²⁰ KIDS 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-omissions.pdf>.

²¹ The Undercount of Young Children, 2014, <https://www.census.gov/content/dam/Census/library/working-papers/2014/demo/2014-undercount-children.pdf>.

²² O'Hare, W.P. (2015). *The Undercount of Young Children in the U.S. Decennial Census*, Springer Publishers.

²³ MEMORANDUM FOR Associate Directorate for Research and Methodology (ADRM), <https://www2.census.gov/cac/nac/meetings/2017-11/Memo-Regarding-Respondent-Confidentiality-Concerns.pdf>.



YWCA USA

1020 19th Street, NW
Suite 750
Washington, DC 20036

P 202.467.0801

F 202.467.0802

ywca.org

- 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 families with at least one undocumented member.^{24[xv]} 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 who 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 fear that policies will change, and even legal permanent residents will be at risk. Therefore, adding a citizenship question also means that 11% of all children age five or under (about 2.6 million children) are also at risk of not being counted.
- Finally, the administration has decided to 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, 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.^{25[xvi]} 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.

²⁴ 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/>.

²⁵ Calculated from the IPUMS system at the University of Minnesota.

Implications for Federal Funding Allocations:

The significant undercount of hard-to-count populations that will be exacerbated by inclusion of a citizenship question will negatively impact federal funding allocations, leaving communities without sufficient resources to address the needs of hard-to-count populations.



YWCA USA

1020 19th Street, NW
Suite 750
Washington, DC 20036

P 202.467.0801

F 202.467.0802

ywca.org

The federal government uses census-derived data to direct at least \$800 billion annually in federal assistance to states, localities, and families. In total, 132 programs relied on Census Bureau data to distribute more than \$675 billion in funds during fiscal year 2015.²⁶[xvii] The data also guide important community decisions affecting schools, housing, health care services, business investment, and much more. The harm from this decision (if it is not reversed) would be universal, with communities that are already at greater risk of being undercounted – including people of color, young children, and low-income rural and urban residents – suffering the most.

Survivors of domestic and sexual violence will be particularly hard-hit by an inaccurate 2020 Census count, as will the nonprofit sector that provides shelter, safety, and support to them[CB8] .

- Among the 132 federal programs that use Census Bureau data to distribute billions in funding each year are key federal funding streams that are distributed to states and tribes to provide safety, shelter, food, and other services to victims of sexual assault and domestic violence. These include Family Violence Prevention and Services/Grants for Battered Women’s Shelters Grants to States and Indian Tribes; Violence Against Women Formula Grants; Rural Domestic Violence, Dating Violence, Sexual Assault, and Stalking Assistance Program; Preventive Health and Health Services Block Grants; the Child and Adult Care Food Program; the Emergency Food Assistance Program; and the Emergency Shelter Grants Program are
- YWCA and other service providers at the community level rely on these federal funds to meet survivor needs, and to fund programs that are effective in preventing domestic and sexual violence.
- Undercounting of this vulnerable population in the 2020 Census will result in lower funding levels for these essential federal funding streams, thereby undermining the considerable progress that has

²⁶ Hotchkiss, Maria and Jessica Phelan. “Use of Census Bureau Data in Federal Funds Distribution: A New Design for the 21st Century.” United States Census Bureau, 2017.

been made in preventing domestic and sexual violence and addressing the needs of survivors.

Undercounting communities of color in the 2020 Census could also impact how federal funding is allocated to states and localities.

- Many programs that impact the communities of color served by YWCAs are based in whole or in part on census-derived data, including the Head Start and Early Head Start Programs; the Child Care and Development Fund; the Supplemental Nutrition Assistance Program; Medicaid; the Women, Infants, and Children program; and the Section 8 Housing Choice Vouchers program.
- Undercounting of communities of color also has implications for their political participation and voting rights. Federal agencies rely on census data to monitor discrimination and implement civil rights laws that protect voting rights, equal employment opportunity, and more. In particular, Section 203 of the VRA requires that language assistance in a designated group's first language be provided through the electoral process if they make up "more than 10,000 or over 5 percent of total voting-age citizens in a single political subdivision" to help ensure their full political participation.²⁷[xviii] Without an accurate count of populations, some communities may not receive the necessary language assistance, resulting in their denial of a full voice in policy decision making.

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 federal funding for critical children's programs in states and particularly in the hard-to-count communities. Among the many federal funding allocations that will be negatively impacted by an undercount of young children are the Child Care and Development Block Grant (CCDBG) and Head Start, both of which YWCAs rely on in providing child care services. Numerous other federal programs will receive lower allocations if young children are undercounted, including Women, Infants and Children (WIC), the Children's Health Insurance Program (CHIP), and Title I and Special Education Grants (IDEA) to schools – which will impact all communities where children are undercounted, and all children and families in those communities.



YWCA USA

1020 19th Street, NW
Suite 750
Washington, DC 20036

P 202.467.0801

F 202.467.0802

ywca.org

²⁷ Lowenthal et al. "Race and Ethnicity in the 2020 Census: Improving Data to Capture a Multiethnic America." 2014.



YWCA USA

1020 19th Street, NW
Suite 750
Washington, DC 20036

P 202.467.0801

F 202.467.0802

ywca.org

- 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.

The consequences of an undercount also go far beyond the financial. 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. State and local governments often decide where to build health centers and provide other medical resources 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.

Costs

An untested citizenship question will drive up costs as the Census Bureau struggles to develop new communications and outreach strategies with little time remaining, plan for an expanded field operation, and track down the millions of households that will be more reluctant to participate because of this controversial question.

Moreover, the overall costs to taxpayers of adding an untested question this late in the process 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.^{28[xix]} A five percent drop in self-response would add an additional, unplanned \$275 million to the census. In addition to the added

²⁸ 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.

costs of nonresponse rates, there is the additional costs of printing larger questionnaires, re-programming the online census instrument and the increased costs of processing more data.

In sum, asking about citizenship in a climate of fear and mistrust can only heighten suspicions, depress response rates, cost additional taxpayer money, and thwart an accurate, inclusive 2020 enumeration.



YWCA USA

1020 19th Street, NW
Suite 750
Washington, DC 20036

P 202.467.0801

F 202.467.0802

ywca.org

A full, fair, and accurate census is absolutely critical for our community. For the reasons discussed above, we strongly oppose asking about citizenship in the 2020 Census and urge the Department of Commerce to remove the proposed citizenship question from the data collection forms.

Sincerely,

A handwritten signature in grey ink, appearing to read "Alejandra Y. Castillo".

Alejandra Y. Castillo, CEO YWCA USA