



WASHINGTON NONPROFITS

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SUMMARY

Washington Nonprofits, Washington State's statewide nonprofit association, has prepared a public comment for "Proposed Information Collection; Comment Request; 2020 Census" regarding the U.S. Census Bureau's 2020 data collection plan. The comments convey two concerns on behalf of nonprofit organizations in Washington State in response to question parts A, C, and D: (1) opposition to the proposed collection of citizenship information; and (2) concerns regarding the switch to an "Internet First" response plan.

INTRODUCTION

In its request, the Census Bureau wrote:

Comments are invited on: (a) Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility; (b) the accuracy of the agency's estimate of the burden Start Printed Page 26653(including hours and cost) of the proposed collection of information; (c) ways to enhance the quality, utility, and clarity of the information to be collected; and (d) ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other forms of information technology.

Below are Washington Nonprofits' responses in the order in which the questions were asked.

QUESTION A: DATA COLLECTION

Washington Nonprofits and many of our members are deeply concerned about the proposed inclusion of a question to gather citizenship data on the 2020 Census. We believe that the question is unnecessary and raises the possibility of an undercount due to the fear that such a question instills among immigrants, refugees, and communities of color. As we wrote in our January 2018 letter to Congress¹:

... [T]he Annual Community Survey already includes a question on immigration and citizenship status, which means that asking such a question in the upcoming census is redundant. However, we do feel the current use of a similar question in the Annual Community Survey is sufficient to address the concerns of the justice Department related to the Voting Rights Act and the potential dilution of minority voices and participation in our democracy.

... [W]e feel that the addition of a citizenship question will depress responses to the census among many Washington residents. If a citizenship query did depress responses,

¹ "Letter to Congress Regarding Proposed Citizenship Question." Washington Nonprofits. January 17, 2018. <https://washingtonnonprofits.org/wp-content/uploads/2018/02/Washington-Nonprofits-Census-Letter-011718.pdf>

as experts have predicted², it could have serious ramifications for the distribution of federal resources as well as the data available for nonprofits and governments to address community needs.

... [C]ensus questions undergo an extensive vetting process that includes trials and other research to ensure that a query elicits an accurate response without unwanted side effects ... Quite simply, the vetting process [has been] rushed with the last-minute addition of a citizenship question to the census. Including a new question so late in the process effectively offers no opportunity to test and correct wording problems.

Additionally, our organization compiled interviews with nonprofit leaders from around the state for the production of our 2018 “Census 2020” video³ conveying reasons for the removal of the proposed citizenship question.

According to Casa Latina’s Marcos Martinez, “Sometimes our communities are not that comfortable sharing information with the government. And we’re very concerned about the possibility of a citizenship question that could appear on the census.” More Equitable Democracy’s Gabriela Quintana emphasized the potential for an undercount by stating, “this creates a huge fear and we’re really concerned that a lot of communities of color and immigrants will choose to opt out of the census entirely.” Win/Win Network’s Elsa Batres-Boni added her perspective that “there are many reasons communities don’t participate for obvious reasons. One is fear. ‘What are they going to do with the information that I’m giving?’” In sum, the levels of fear, distrust, and concern provide cause for immigrants, refugees, and communities of color to deliberately avoid participating.

With nearly \$14 billion at stake in federal funds for Washington State and the possibility of inaccurate data looming, we believe that the risks associated with the proposed citizenship question outweigh the benefits touted by question proponents. Washington Nonprofits has expressed these concerns in-person to all 12 of our state’s congressional offices, and also delivered 600+ postcards from constituents, demonstrating the broad opposition that exists within our state to this question. Therefore, we urge the Census Bureau to strike the proposed citizenship question from the 2020 Census.

QUESTION C: Data Quality

Based on the information we compiled from the nonprofit community, we believe that the proposed citizenship question will impact the quality of data collected. As mentioned above, the climate of fear among communities of immigrants, refugees, and communities of color is likely to decrease the volume of responses collected if the citizenship question remains.

Additionally, we believe that the shift to an “Internet First” response system poses its own challenges for data collection that will decrease the quality of the available data. First and foremost, access to quality Internet service in Washington State is inconsistent and depends on socioeconomic status and geography. As we have observed through our work in communities

² “Adding Citizenship Question Risks ‘Bad Count’ For 2020 Census, Experts Warn.” Hansi Lo Wang. NPR. January 10, 2018. <https://www.npr.org/2018/01/10/575145554/adding-citizenship-question-risks-bad-count-for-2020-census-experts-warn>

³ “Census 2020.” Washington Nonprofits. May 2018. <https://vimeo.com/270481348>

throughout rural Washington, broadband access is inconsistent. If the website used by the Census Bureau requires significant bandwidth to access, then it is entirely possible that respondents with poor connections will either become discouraged by the time that it takes to complete the Census or be unable to load the webpage. Second, with increasing numbers of people using mobile devices to access the Internet, it is important for the website be optimized for mobile viewing. If the site does not appear cleanly on mobile devices, respondents are also likely to become discouraged and not participate. Third, seniors and others may opt out of participating in the Census via the Internet due to unfamiliarity with the technology, out of date devices that cannot handle the data collection site, or lack of trust in supplying data electronically that was previously supplied through the mail or in-person.

QUESTION D: Minimizing the Burden on Respondents

Washington Nonprofits recommends these items to reduce the burden on respondents:

1. Remove the Citizenship Question

As previously mentioned, the citizenship question poses unique problems for immigrants, refugees, and people of color. To minimize the burden on those populations, the citizenship question should be removed from the Census.

2. Mobilize Nonprofits to Help Undercounted Communities Get Counted

Nonprofit organizations in Washington State have a vested interest in ensuring an accurate count. In a recent op-ed⁴ on the importance of the 2020 U.S. Census, Washington Governor Jay Inslee's office listed many of the programs⁵ that receive federal dollars tied to the U.S. Census – many of which are either implemented by nonprofit organizations or overlap with other services provided to nonprofit clients. These programs include the Supplemental Nutrition Assistance Program (SNAP), Medicaid, Medicare Part B, Children's Health Insurance (CHIP), Head Start, Section 8 Housing, foster care, and Low Income Home Energy Assistance (LIHEAP). Agencies that administer these programs or serve clients who receive these supports are in prime position to raise awareness about the Census and ensure an accurate count. Washington Nonprofits recommends that the Census Bureau create a dedicated outreach plan that leverages nonprofits' community connections and trust in order to counter stigmas and address any barriers that arise for the 2020 Census.

3. Make the Internet Collection Site Low-Bandwidth and Mobile Optimized

As mentioned in our response to question C, the data collection website from the Census Bureau must be accessible to users with varying levels of bandwidth, technical equipment, and technological familiarity.

ABOUT WASHINGTON NONPROFITS

Washington Nonprofits is Washington's state association for nonprofits. Its mission is to make sure nonprofits have what they need to succeed. It helps nonprofits learn, increase their influence, and connect to people and resources. Visit our website at

⁴ "Accurate 2020 census a priority for Inslee." Washington Governor's Office. Medium. April 11, 2018. <https://medium.com/wagovernor/accurate-2020-census-a-priority-for-inslee-a77f1546828f>

⁵ "Counting for Dollars 2020: Washington." George Washington Institute of Public Policy. August 18, 2017. <https://gwipp.gwu.edu/sites/g/files/zaxdzs2181/f/downloads/Washington%20CFD%2008-18-17.pdf>

<http://www.washingtonnonprofits.org> or contact Washington Nonprofits' Public Policy Director David Streeter at (855) 299-2922 for more information.