



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

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

Dear Ms. Jessup,

On behalf of the Association of Asian Pacific Community Health Organizations (AAPCHO), we write to offer comments on the 2020 Census proposed information collection. AAPCHO strongly supports the development of a fair and accurate decennial census and appreciate the years of work that goes into planning the census. Census data is critical for the health care programs that vulnerable and low-income Asian American (AA), Native Hawaiian and Pacific Islander (NHPIs) populations rely on, as well as ensuring their fair representation in the voting process. ***In the strongest possible terms, we urge the Department of Commerce to eliminate the citizenship question from the 2020 Census form as it will jeopardize the accuracy of the census in all communities.***

AAPCHO is a national not-for-profit association of 34 community-based health care organizations, 29 of which are Federally Qualified Health Centers, that primarily serve medically underserved AAs and NHPIs. AAPCHO is a national voice to advocate for the unique and diverse health needs of AA and NHPI communities and the community health providers that serve those needs. Among other things, AAPCHO develops, tests, and evaluates health education and promotion programs with national significance. We also offer technical assistance and training to promote the establishment and expansion of services for medically underserved AA and NHPI communities.

A 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 work that AAPCHO members do and to health care services in general. Article 1, Section 2 of the U.S. Constitution calls for an "actual Enumeration" of the U.S. population, and not just a count of U.S. citizens, since an accurate population count is necessary to proportionally allocate billions of dollars in federal funds to states and local communities. Census data are used to direct federal funding for Medicaid and the Children's Health Insurance Program (CHIP), determine each state's federal matching share and direct sufficient federal funds to state health care needs. The data are also used to develop the Index of Medical Underservice and Health Professional Shortage Areas. If the decennial census undercounts eligible families, there is an increased likelihood that an area would not qualify for services under the health center programs.

It is estimated that in 2015, the average state lost more than \$1,000 in federal dollars for each resident missed by the 2010 Census. An undercount as small as 2 percent would have cost the average state more than \$80



million a year, *mostly in Medicaid money*<sup>1</sup>--some states would face an even more dramatic withdrawal of federal funds and budget shortfalls. An undercount would similarly impact the amount of funding for each state's CHIP—which is a block grant. For example, North Carolina estimates that 25,000 children in North Carolina were not counted in the 2010 census and that "in the early years of the Children's Health Insurance Program (CHIP), North Carolina's federal block grant allocation for the program was exhausted mainly due to a large undercount of our child population."<sup>2</sup>

To ensure low-income and underserved AA and NHPI populations are able to access health services in their communities, they must be counted. That is why the 2020 Census should not include a question on citizenship that the weight of scientific evidence indicates will undermine a successful count of our nation's people.

Unfortunately, AA and NHPI households are at risk of being under counted. Roughly one in five AAs live in hard-to-count census tracks, along with one third of NHPIs. The so-called "hard-to-count" communities are at higher risk of not being fully counted in the census, leading to unequal political representation and unequal access to vital federal resources.

The AA and NHPI communities are very diverse, and overall statistics can easily mask the characteristics and challenges facing subgroups. Certain communities are at greater risk for being undercounted due to challenges in finding stable and affordable housing, have higher incidences of poverty and unemployment and lower educational attainment, and encounter greater language barriers than other subgroups within this broad race category<sup>3</sup>. It is especially important that the census accurately and fairly captures the diverse AA and NHPI populations because they are growing so rapidly.

Adding an untested question on citizenship will compromise implementation of the 2020 Census. Already, in the current political environment, immigrants feel concerned about civic engagement in many aspects of their life. This question plays on those fears and is designed to deter full and fair participation. This question will cause fear and may cause people to avoid the census for fear of being targeted by this Administration. The Census Bureau's own research shows that asking about citizenship has a chilling effect on respondent's willingness to answer surveys and share data. This will result in dramatic undercounting of certain immigrant populations.

Unless this question is removed from the 2020 Census, the harm from this decision would be wide-spread and profoundly damaging, with AA and NHPI communities that are already at greater risk of being undercounted suffering the most. 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

---

1 [https://familiesusa.org/sites/default/files/product\\_documents/MCD\\_Census-Undercount\\_Factsheet\\_0.pdf](https://familiesusa.org/sites/default/files/product_documents/MCD_Census-Undercount_Factsheet_0.pdf)

2 <http://www.ncpolicywatch.com/2017/11/27/nc-lose-big-2020-census/>

3 <http://civilrightsdocs.info/pdf/census/2020/Fact-Sheet-AA-NHPI-HTC.pdf>



controversial question. In sum, asking about citizenship status 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.

A full, fair, and accurate census is absolutely critical for the AA and NHPI community. 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.

Sincerely,

Jeffrey B. Caballero, MPH  
Executive Director