



INTERCULTURAL DEVELOPMENT RESEARCH ASSOCIATION

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

Via PRAcomments@doc.gov

Re: Written Comments on Proposed Rules for **Information Collection, 2020 Census**
Docket ID: USBC–2018–0005

Dear Ms. Jessup:

The Intercultural Development Research Association thanks the Department of Commerce for the opportunity to submit these comments in response to the Notice of Proposed Rulemaking published on June 8, 2018 (83 Fed. Reg. 26643).

Below, please find an abbreviated background on our organization followed by comments addressing issues raised in the NPRM. The comments made below concern the following areas: **citizenship question**.

Our comments on the regulations are based on 45 years of working with educators, parents and children in underserved communities in Texas and across the nation.

Background on IDRA

For 45 years and counting, IDRA has worked to assure equity and educational opportunity for every child, focusing especially on students of color, immigrant students, students who are economically disadvantaged, and English learner students (collectively herein, "underserved students"). We have aided with the design and implementation of many successful programs under grants administered under Titles I, II, III and IV of the ESEA, among other federal work. IDRA's track record in educational research, evaluation and policy on behalf of underserved students, together with its extensive experience family and community engagement – among other areas – form a strong basis for its policy perspectives and recommendations at the federal level.

Specific Comments

1. The 2020 Census form should not include a question about citizenship.

The proposed rule acknowledges three important roles that the U.S. Census serves society: reapportionment of the U.S. House of Representatives; drawing of legislative district boundaries; and distribution of \$675 billion of federal funds.

As noted in the NPRM, “The proposed questions for the 2020 Census questionnaire include age, **citizenship**, Hispanic origin, race, relationship, sex, and tenure” (26646, emphasis added). The inclusion of the citizenship question serves no useful purpose, but it would likely have a devastating impact on underserved communities and children. One in four young children live in households with at least one immigrant family member.ⁱ Already, children and families are undercounted. According to a recent Kids Count report, the U.S. Census Bureau missed approximately 2 million children in the 2010 Census, or almost one in 10 children and babies under the age of 4.ⁱⁱ

Since the 1970s, IDRA has assisted schools in meeting their civil rights obligations owed to schoolchildren, including immigrant students. IDRA has provided technical assistance to schools and communities serving significant numbers of immigrant families. Among our many services, we help schools improve engagement with immigrant communities, increase their cultural competence, and reduce bias and bullying against immigrant students. We also conduct outreach to advise schools and communities of the rights of undocumented immigrant students in schools.

IDRA has testified as experts in the *Plyer v. Doe* case, noting the harmful impact on children and families that would result from the denial of education. IDRA also conducted a study of the conditions of education in an immigration detention facility in Hutto, Texas, in the mid-2000s.ⁱⁱⁱ

In our many experiences, we recognize the strengths and resolve in these communities. But we also note the fear placed upon them by federal, state and local policies targeting – directly or indirectly – immigrant communities. Our experience suggests that asking immigrant families questions about their citizenship will likely result in an undercount. This is especially true in today’s world where immigrants’ daily lives are disrupted by the fear imposed upon them by state and federal policies and actions targeting immigrants and perceived immigrants.^{iv}

According to a memo from the Center for Survey Measurement to the Associate Directorate for Research and Methodology for the Census Bureau, respondents in pretesting studies conducted in 2017 demonstrated many reservations about documenting their citizenship status and that of their family members. Overall, “the findings were particularly troubling given that they impact hard-to-count populations disproportionately and have implications for data quality and nonresponse.”^v

The miscounts and undercounts of children and families would likely impact their effective representation in the democracy through apportionment and redistricting. Furthermore, it will likely have a negative impact on their schools and their communities because they will be denied federal programs and services based on census counts.^{vi}

Underserved communities and students already struggle often due to several external factors, including the lack of equity and systemic support in public education.^{vii} Federal programs and resources help fill that critical void yet adding the citizenship question acts against that interest.

Research shows that child development and early childhood education is critical to achieving success in school.^{viii} Yet, the undercount of children stemming from the citizenship question would likely reduce critical services offered through census-funded programs, such as the Child Development Block Grants and Head Start programs in high-need areas in Texas, Florida, Arizona and California, among other states.

The undercount would also lead to lower resources for schools serving immigrant students and facing challenges under the Every Student Succeeds Act (ESSA). The purpose of ESSA is to help ensure that state and local education agencies fulfill their role under the Act in providing all children “significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps” (ESSA § 1001, Statement of Purpose). To support that purpose, ESSA provides resources to states serving high-need students, including low-income and English learners through Title I grants and English Language Acquisition grants – both which are funded based on census counts.

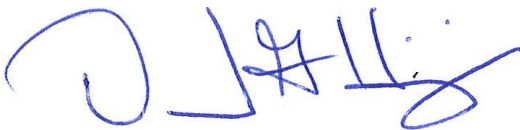
Because parents of immigrant students and immigrant parents of citizen students may not fill out the Census 2020 forms due to the citizenship question, their states and schools will likely not receive the federal funds they need to help those students succeed. This same logic applies to several other census-funded federal programs for which immigrant students and children, or sons and daughters of immigrant parents, may qualify, including the National School Lunch Program.

Aside from federal programming and funds, census data are used by businesses for relocation; by counties and cities for housing development, including mixed income developments, public transportation, public health, and law enforcement; and by school districts for opening new schools. Having reliable, accurate census data must be a priority.

Accordingly, we respectfully urge the Department of Commerce not to include the citizenship question on the Census 2020 form. We also commend the Census Bureau for changing the wording on the form to more accurately count young children and babies, though other research and action should take place to ensure they are not undercounted.

IDRA thanks you for your work on ensuring an accurate and purposeful census count. Please let us know if you have any questions by contacting me at david.hinojosa@idra.org.

Sincerely yours,



David G. Hinojosa
National Director of Policy

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- ⁱ Artiga, S., & Damico, A. (April 18, 2018). “Nearly 20 Million Children Live in Immigrant Families that Could Be Affected by Evolving Immigration Policies,” *Disparities Policy* (Washington, D.C.: Kaiser Family Foundation). <https://www.kff.org/disparities-policy/issue-brief/nearly-20-million-children-live-in-immigrant-families-that-could-be-affected-by-evolving-immigration-policies/>
- ⁱⁱ Annie E. Casey Foundation. (2018). 2018 Kids Count Data Book, State Trends in Child Well-being (Baltimore, Md.: Annie E. Casey Foundation). <http://www.aecf.org/m/resourcedoc/aecf-2018kidscountdatabook-2018.pdf>. Decennial Statistics Studies Division. (July 26, 2016). *Investigating the 2010 Undercount of Young Children – A New Look at 2010 Census Omissions by Age* (Washington, D.C.: U.S. Department of Commerce). <https://www2.census.gov/programs-surveys/decennial/2020/program-management/memo-series/2020-report-2010-undercount-children-omissions.pdf>
- ⁱⁱⁱ Intercultural Development Research Association. (2018). A History of IDRA Policy Work to Secure Excellent and Equitable Schooling for All Children (San Antonio, Texas: Intercultural Development Research Association). <https://www.idra.org/wp-content/uploads/2018/07/A-History-of-IDRA-Policy-Work-to-Secure-Excellent-and-Equitable-Schooling-for-All-Children.pdf>
- ^{iv} Artiga, S., & Ubri, P. (December 13, 2017). “Living in an Immigrant Family in America: How Fear and Toxic Stress are Affecting Daily Life, Well-Being, & Health” *Disparities Policy* (Washington, D.C.: Kaiser Family Foundation). <https://www.kff.org/disparities-policy/issue-brief/living-in-an-immigrant-family-in-america-how-fear-and-toxic-stress-are-affecting-daily-life-well-being-health/>
- ^v Center for Survey Measurement. (September 20, 2017). “Memorandum for Associate Directorate for Research and Methodology (ADRM), Subject: Respondent Confidentiality Concerns (Washington, D.C.: U.S. Department of Commerce). <https://www2.census.gov/cac/nac/meetings/2017-11/Memo-Regarding-Respondent-Confidentiality-Concerns.pdf>
- ^{vi} Hotchkiss, M., & Phelan, J. (September 2017). *Uses of Census Bureau Data in Federal Funds Distribution, A New Design for the 21st Century* (Washington, D.C.: U.S. Department of Commerce). <https://www2.census.gov/programs-surveys/decennial/2020/program-management/working-papers/Uses-of-Census-Bureau-Data-in-Federal-Funds-Distribution.pdf>
- ^{vii} Hinojosa, D. (September 2017). “Tying the Knot Between School Finance Policy and Serving All Students,” *IDRA Newsletter* (San Antonio, Texas: Intercultural Development Research Association). <https://www.idra.org/resource-center/tying-knot-school-finance-policy-serving-students/>
- ^{viii} Johnson, P. (September 2017). “Investing in Early Childhood Programs Yields High Returns,” *IDRA Newsletter* (San Antonio, Texas: Intercultural Development Research Association). <http://idra.staging.wpengine.com/resource-center/investing-early-childhood-education-programs-yields-high-returns/>
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The Intercultural Development Research Association is an independent, non-profit organization, led by María “Cuca” Robledo Montecel, Ph.D. Our mission is to achieve equal educational opportunity for every child through strong public schools that prepare all students to access and succeed in college. IDRA strengthens and transforms public education by providing dynamic training; useful research, evaluation, and frameworks for action; timely policy analyses; and innovative materials and programs.