

## public comment for CSAC -- March 29

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To: Census Scientific Advisory Committee (CENSUS) <census.scientific.advisory.committee@census.gov>;

Cc: Tara T Dunlop Jackson (CENSUS/PPSI FED) <tara.dunlop.jackson@census.gov>; allisonp@datacenterresearch.org (CENSUS/ OTHER) <allisonp@datacenterresearch.org>;

Dear members of the Census Scientific Advisory Committee,

I appreciate the opportunity to submit comments for your consideration.

As you know, on February 15, 2019 the Census Bureau submitted an Information Collection Request (ICR) for the 2020 Census to the Office of Management and Budget (OMB) for review and approval. See [https://www.reginfo.gov/public/do/PRAViewICR?ref\\_nbr=201812-0607-003](https://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=201812-0607-003) The 30-day period for public comment recently closed.

Section 8 of Supporting Statement Part A of the 2020 Census ICR (<https://www.reginfo.gov/public/do/DownloadDocument?objectID=88197700>) describes the rationale for Secretary Ross's decision to add a citizenship question to the 2020 Census:

As part of the Secretary's hard look at DOJ's request, the Census Bureau considered whether inclusion of the citizenship question would impact self-response, thereby increasing the Nonresponse Followup workload, in which census enumerators contact non-responding households to complete the questionnaire. There was limited data to determine the potential impact to response rates, so the Census Bureau evaluated information from the Census 2000 short and long form and the American Community Survey programs. Ultimately, the Census Bureau estimated that the Nonresponse Followup workload could potentially increase by approximately 630,000 households, or 0.5 percent of the entire estimated population, and that any additional workload would be easily accommodated in the Lifecycle Cost Estimate the Congress has so far approved with the aid of Secretary Ross' robust support. **To clarify, the Census Bureau has identified no credible quantitative evidence that the addition of a citizenship question would impact the net undercount of the 2020 Census.** (emphasis added) After a thorough review of the legal, program, and policy considerations, as well as numerous discussions with the Census Bureau leadership and interested stakeholders, Secretary Ross determined that reinstatement of the citizenship question on the 2020 decennial census is necessary to provide complete and accurate data in response to the request from the DOJ. (page 40)

Secretary Ross's letter of March 26, 2018 ([https://www.dropbox.com/s/kavbvz8tl6wf7bx/Ross%202018-03-26\\_2.pdf?dl=0](https://www.dropbox.com/s/kavbvz8tl6wf7bx/Ross%202018-03-26_2.pdf?dl=0)) also describes his reasoning for deciding it is appropriate to include the citizenship question on the 2020 Census:

[T]he Department's review found that limited empirical evidence exists about whether adding a citizenship question would decrease response rates materially. . . . [N]o one provided evidence that reinstating a citizenship question on the decennial census would materially decrease response rates among those who generally distrusted government and government information collection efforts, disliked the current administration, or feared law enforcement. . . . [N]o one provided evidence that there are residents who would respond accurately to a decennial census that did not contain a citizenship question but would not respond if it did (although many believed that such residents had to exist). (page 5)

I have several questions and observations for CSAC members:

- Do CSAC members find the decision criterion described in the bolded sentence in the first paragraph above to be consistent with good scientific statistical practice, generally speaking, and the Census Bureau's Statistical Quality Standards in particular? (<https://www.census.gov/about/policies/quality/standards.html>)
- My understanding is that Kevin Smith, the Census Bureau's Chief Information Officer, is responsible for affirming Census Bureau adherence to Information Quality Act guidelines. (See Section IV, paragraph 1 of

<https://www.federalregister.gov/documents/2002/02/22/R2-59/guidelines-for-ensuring-and-maximizing-the-quality-objectivity-utility-and-integrity-of-information>.) Would the CSAC ask Mr. Smith if he would affirm that the bolded decision criterion above is consistent with the Census Bureau's Statistical Quality Standards and if he would cite the evidence for his determination, whatever it is?

- In light of the parallel language and conclusions in the Supporting Statement and the Secretary's letter, what is CSAC members' sense of the likelihood that the quoted Supporting Statement text was prepared by the Secretary's political staff rather than Census Bureau professional staff?
- In light of their answers, do CSAC members have any concerns about the Census Bureau's ability to fully adhere to:
  - "Principle 4: Independence from Political and Other Undue External Influence" of the National Academies' *Principles and Practices for a Federal Statistical Agency*, Sixth Edition ([http://sites.nationalacademies.org/DBASSE/CNSTAT/Principles\\_and\\_Practices\\_for\\_a\\_Federal\\_Statistical\\_Agency/index.htm](http://sites.nationalacademies.org/DBASSE/CNSTAT/Principles_and_Practices_for_a_Federal_Statistical_Agency/index.htm)) and
  - "Statement of Commitment to Scientific Integrity by Principal Statistical Agencies" ([https://www.census.gov/about/policies/quality/scientific\\_integrity.html](https://www.census.gov/about/policies/quality/scientific_integrity.html))

The author of the 2020 Census Supporting Statement Part A is identified as Vicky Dempsey Trump. Ms. Trump is not in the Commerce Department personnel directory. Understanding Ms. Trump's role in the preparation of this document may be useful context as you consider my questions.

Thank you and I look forward to members' responses.

Sincerely,

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