August 6, 2018

Jennifer Jessup
Department Paperwork Clearance Officer
Department of Commerce, Room 6612
14th and Constitution Ave., NW
Washington, DC 20230

Re: Docket Number USBC-2018-0005

Dear Ms. Jessup:

The North Carolina Center for Nonprofits (the Center) is submitting these comments in response to the Census Bureau’s notice regarding the proposed collection of data on the 2020 Census forms. The Center, a network of nearly 1,500 charitable nonprofits serving communities throughout North Carolina, is writing to express our strong opposition to including a citizenship question in the 2020 Census, since the inclusion of this question will undermine the accuracy of Census data.

The U.S. Constitution requires a full, fair, and accurate count of all persons living in the United States. The Center believes that 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. Not only is a nationwide Census required by the Constitution, it is integral to our democracy, ensuring that district lines and political power are fairly drawn and allocated. The federal government uses Census-derived data to direct at least $600 billion annually in federal assistance to states, localities, and families. The data also guide important community decisions affecting schools, housing, health care services, business investment, and much more.

The harm of including a citizenship question on the 2020 Census would be felt across the country, with communities that are already at greater risk of being undercounted – including people of color, immigrants, young children, and low-income rural and urban residents – being impacted the greatest. An untested citizenship question will also drive up costs at the Census Bureau, with little time to 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. Asking about citizenship status could significantly depress response rates, cost additional taxpayer money, and thwart an accurate, inclusive 2020 Census count.

Every year more than $600 billion in federal funds, all of which depend on accurate Census data, provide support to critical programs important to state and local governments, including the National School Lunch program, Supplemental Nutrition Program for Women, Infants and Children (WIC), Supplemental Nutrition Assistance Program (SNAP), Children’s Health Insurance Program (CHIP), Medicaid, Child Care and Development Block Grant (CCDBG), Head Start, and Early Head Start. These federal programs are essential to nonprofits providing a wide variety of services – including affordable housing, early childhood support, healthcare, and food assistance – in our communities. In 2015, it was projected that North Carolina lost approximately $94.2 million in federal funds due to a 1% undercount in the 2010 Census. If the citizenship question is included on the 2020 Census, North Carolina communities could stand to lose even more of these vital federal resources.
A full, fair, and accurate census is absolutely critical for our country and for communities across North Carolina. The North Carolina Center for Nonprofits strongly opposes asking about citizenship status in the 2020 Census and urges the Department of Commerce to remove the proposed citizenship question from the data collection forms.

Thank you for your consideration of these concerns. Please do not hesitate to contact me with any questions you may have.

Sincerely,

David R. Heinen
Vice President for Public Policy and Advocacy