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February 8, 2018

The Honorable Wilbur Ross

Secretary of Commerce

U.S. Department of Commerce

1401 Constitution Ave NW

Washington, DC 20230

Dear Secretary Ross,

On behalf of the National League of Cities (NLC) and the more than 19,000 municipal governments we represent, we urge you to reject the Department of Justice's (DOJ) request to add a new and untested citizenship question to the 2020 Census. The addition of such an untested question this late in the process would have a negative effect on participation and would drastically reduce the likelihood of an accurate count in many cities, towns and villages in every state.

America's local leaders share your commitment to facilitating and executing a full, fair and accurate census in 2020. Since the first count in 1790, the census has tallied the total population of both non-citizens and citizens alike. Cities depend on the completion of a successful census for research, strategic planning, grant funding, economic development and congressional districting; a successful census depends on cooperation and participation by all residents of the United States.

The addition of a question that has not been tested in a contemporary census environment or as part of a radically redesigned census would not only be reckless and disruptive, but would also jeopardize the eight years of diligent preparations that have already gone into the 2020 census. Design of the upcoming census began in 2010, and since then all aspects of the census have undergone intense scrutiny and analysis to determine and prevent attrition in participation. The Census Bureau must submit the proposed questions for congressional review by March 31 of this year; the one and only end-to-end census test begins in Providence County, Rhode Island, next month, and will not include such a question. Given this timeframe, there is no conceivable way in which this addition could be vetted with the thoroughness demanded of such an

important consideration. Furthermore, the DOJ request would decrease the rate of self-response in many communities, thus raising the cost of nonresponse follow-up (NRFU) operations at a time when the Census Bureau is already under intense pressure to cut costs.

Experts from both sides of the aisle argue that the addition of a citizenship question would exacerbate privacy concerns, reduce participation and result in inaccurate responses. Four former Census Bureau directors who served under both Republican and Democratic administrations have backed these claims and concluded that such an addition would only lead to worse data. The issue would be compounded for more vulnerable minority populations who were undercounted at disproportionately high rates in 2010. Counts for citizens and non-citizens alike would be adversely impacted, particularly in mixed-status households. The DOJ's request would add an unnecessarily intrusive question onto a census and spike fears about data confidentiality. This, coupled with a growing climate of fear, would undoubtedly suppress participation and threaten the accuracy of the decennial census in 2020 and the credibility of the Bureau for years to come.

Finally, the DOJ's claim that the addition of a citizenship question is necessary to enforce the Voting Rights Act of 1965 is questionable and not borne out by the historical record. The Voting Rights Act has relied exclusively on citizenship data collected through robust but much smaller surveys, most recently the American Community Survey (ACS). For the past 53 years, the DOJ has reliably used data from other Census Bureau surveys to fully enforce the Voting Rights Act, leading us to seriously question the necessity for drastic changes made to the only constitutionally-mandated count of the nation's population.

For the reasons outlined above, we urge you to join us and countless other civic leaders, businesses and academic institutions in rejecting the DOJ's request to add a citizenship question to the 2020 census. If you have any additional questions, please contact Brian Egan, principal associate, federal advocacy at (202)-626-3107 or at egan@nlc.org.

Sincerely,

A handwritten signature in black ink, appearing to read 'Clarence E. Anthony', with a long horizontal flourish extending to the right.

Clarence E. Anthony

CEO and Executive Director

National League of Cities

CC:

- **Ron Jarmin**, Acting Director of the U.S. Census Bureau
- **Senator Ron Johnson**, Chairman of the U.S. Senate Committee on Homeland Security and Governmental Affairs
- **Senator Claire McCaskill**, Ranking Member of the U.S. Senate Committee on Homeland Security and Governmental Affairs
- **Congressman Trey Gowdy**, Chairman of the U.S. House of Representatives Committee on Oversight and Government Reform
- **Congressman Elijah Cummings**, Ranking Member of the U.S. House of Representatives Committee on Oversight and Government Reform