

August 7, 2018

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

Submitted via <http://www.regulations.gov> (Docket # USBC-2018-0005)

RE: Comments on Proposed Information Collection on 2020 Census

Dear Ms. Jessup:

The Disability Rights Education and Defense Fund (DREDF) appreciates the opportunity to provide comments in response to the Federal Register notice regarding proposed information collection in the 2020 census.

DREDF was founded in 1979 as a unique alliance of adults with disabilities and parents of children with disabilities. DREDF advances the civil and human rights of people with disabilities through legal advocacy, training, education, and public policy and legislative development. We address employment, housing, access to government services and benefits, transportation, higher education, architectural access, public accommodations, and education, focusing on civil rights issues that promote integration of people with disabilities into the mainstream of society. One-third of our work aims to protect and advance the rights of students with disabilities.

DREDF specializes in federal disability rights laws, including Section 504 of the Rehabilitation Act of 1973, prohibiting disability-based discrimination by recipients of federal funds; the Individuals with Disabilities Education Act of 1975 (IDEA), guaranteeing appropriate education services in the “least restrictive environment” for children with disabilities; and the Americans with Disabilities Act of 1990 (ADA). In light of DREDF’s commitment to ensuring access to education for all students in this country, it is important to note that census data impacts estimates for school districts in the Small Area Income Poverty and Estimates Program (SAIPE) and the Individuals with Disabilities Act (IDEA) formulas for grant funding.¹ Data quality for SAIP and associated IDEA programs is paramount to ensure every child receives a free and appropriate education with the services and supports they need to thrive.

As the Leadership Conference on Civil and Human Rights (LCCHR) stated in comments submitted August 1, 2018,

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“The overarching goal of the decennial census must be an accurate count of all persons residing in the country. Any element of the census design and plan that might undermine or detract from the Census Bureau’s ability to achieve that goal simply cannot stand.”

DREDF fully supports and writes to reiterate the full comments submitted by LCCHR. DREDF urges the Census Bureau, in the strongest possible terms, to remove the proposed citizenship status question from the 2020 Census form. In response to the formal Request for Comments on four questions (section IV of the Notice):

1. The proposed citizenship status question does not have practical utility and should be removed from the 2020 Census questionnaire.
2. Adding a citizenship status question will increase the cost of the 2020 Census significantly but unnecessarily — costs that will be borne by American taxpayers.
3. Assuming for arguments’ sake only that the Department of Justice requires block level citizen voting age population data to implement federal statutes, the Census Bureau can improve the quality of the requested data, protect the quality and accuracy of all other data collected in the 2020 Census, and minimize the burden of information collection on the public, by using administrative records data.

DREDF is deeply concerned with the possibility that millions of citizens, especially children, living in mixed households could be left out if there is fear of consequences for filling out the form. Self-responses could decline and data quality could be put at risk. In addition, as LCCHR notes, the final opportunity for testing the census with a citizenship question has passed. Adding a new, controversial citizenship question could affect the cost, quality, and accuracy of the entire decennial census.

Thank you for the opportunity to respond to the questions to be asked in the 2020 Census. If you have any questions about these comments, please contact Susan Henderson, Executive Director, at shenderson@dredf.org or (510) 644-2555.

Sincerely yours,



Susan Henderson
Executive Director

ⁱ Andrew Ujjifusa. Here's How Changes to the U.S. Census Could Impact Education Funding, *Education Week*, March 28, 2018. Obtained at http://blogs.edweek.org/edweek/campaign-k12/2018/03/us_census_changes_education_funding_impact.html?qs=census+education