

August 06, 2018

Secretary Wilbur L. Ross
Department of Commerce
Herbert Clark Hoover Building
1401 Constitution Avenue, NW
Washington, DC 20230

Dear Secretary Ross,

On behalf of the Council on Social Work Education (CSWE) and the Society for Social Work and Research (SSWR), we submit the following information in response to the request for comments on the Federal Register Docket number USBC–2018–0005. We wish to convey our serious concerns about the decision by the Department of Commerce to include a question about the respondent’s citizenship to the 2020 Decennial Census for several reasons. Central to all of these concerns is that research and rigor are about accuracy, not ideology.

Years of research and testing go into the production of the census questions to ensure that even small changes in design and phrasing will not impact the accuracy of the received responses. As the Constitution mandates that all persons be counted, we are deeply concerned that a total disregard for the detrimental impact one very large and polarizing question regarding citizenship will have on the rate of responses. This creates three big problems.

First, the 2020 Census will fail to live up to the Constitution, which mandates that “actual Enumeration” will be determined “within every subsequent Term of ten Years.” This is critical not only to determining the representation by state within the House of Representatives, but also to the distribution of a substantial number of resources.

Second, the United States is home to roughly 325 million people, and more than 40 million of them are foreign born. If more than 10 percent of the individuals surveyed have serious reservations about participating in a study, the accuracy of the results will be substantially flawed. While these populations may be assured by the federal government that there are safeguards in place to ensure that these data will not be used to nefarious ends, there is a dark chapter in our nation’s history in which Census Bureau data were utilized to disregard the rights and civil liberties of many Americans, resulting in their placement in internment camps. It is understandable that even legal citizens may have some concerns about exactly what the government intends to do with the data.

Third, if the data are not accurate, that renders the Census relatively meaningless for research, representation, and resource distribution purposes. From a fiscal responsibility perspective, that’s deeply concerning. The cost of executing the 2020 Census, based on projections made by you in October 2017, is \$15.6 billion. Furthermore, according to a study “Uses of Census Bureau Data in Federal Funds Distribution,” released by the United States Department of Commerce in September 2017, the Census Bureau data in fiscal year 2015 was used to support 132 federal programs which cost the government \$675 billion dollars. Those funds support everything from healthcare and education to public safety and infrastructure, and the projected allocation is dependent upon accurate inputs. A poor calculation based on a misalignment between resources and expected need could put substantial strain on states across the country. The data from the survey are also used to help make informed decisions regarding economic planning, workforce projections, and income and poverty estimates.

As social work researchers and educators, we are deeply concerned about the lack of scientific rigor being applied to an extremely expensive process. Without meaningful data, communities may be deeply hurt in unpredictable and unexpected ways for the sake of politics. That is neither responsible governance nor responsible experimentation.

We appreciate your willingness to solicit public feedback on the possible outcomes of this inclusion in the 2020 Census questions and hope you will realize that a political gambit could render this extremely expensive survey largely useless as far as an accurate enumeration of all the people living in this country is concerned.

Best regards,

Darla Spence Coffey, CSWE President and CEO

A handwritten signature in black ink that reads "Darla Spence Coffey". The signature is written in a cursive style with a large initial 'D'.

Ruth Dunkle, SSWR President

A handwritten signature in black ink that reads "Ruth E. Dunkle". The signature is written in a cursive style with a large initial 'R'.