



August 5, 2018

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

RE: Comments on Proposed Information Collection on 2020 Census, Docket No. USBC-2018-0005

Dear Ms. Jessup,

On behalf of the South Asian Network (SAN), we write to offer comments on the 2020 Census proposed information collection. We strongly urge the Department of Commerce to remove the citizenship question from the 2020 Census form, as it will jeopardize the accuracy of the census in all communities – an outcome that the nation will have to live with for the next 10 years.

Accurate and reliable census data are a necessary foundation for a well-functioning government, robust civil society, and thriving economy in the United States. As a community-based non-profit organization, based in Southern California, that serves one of the largest and fastest growing populations of South Asian Americans in the country, we rely on accurate census data to help identify and respond to the needs of our community. However, this accuracy and our ability to serve our community will be severely jeopardized if a citizenship question is included on the 2020 Census. We worry that adding a question about citizenship status sends the message that non-citizens, documented or undocumented, are being counted and tracked -- a message that could sway many in our communities to fail to respond to the survey.

The precedent for utilizing Census data to target specific populations exists in the United States. It has been confirmed that the 1940 Census was used to identify and forcibly relocate Japanese Americans into internment camps. In the current political environment, immigrants are being targeted by policies ranging from the Muslim Ban to mass deportations, detentions, and even denaturalizations, and their worst fears are realized when federal agents invade homes, schools, and places of worship and families are torn apart both at the U.S. border and in the heart of communities. We must not allow the Census to become another tool that aids these policies.

South Asian Americans, particularly from low-income, limited English proficiency households, have traditionally been a “Hard to Count” population. Adding a citizenship question will add another burden to their full participation on the Census. In turn, this will make it even more difficult for organizations like ours that work directly with the community, to collect accurate information about those we serve. Furthermore, severe undercounting will lead to a decrease in resources and representation for our growing, diverse community.

We believe 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. That is why the 2020 Census should not include a question on citizenship that the weight of scientific evidence indicates will undermine a successful count of our nation's people.

The harm from this decision to include a citizenship question (if it is not reversed) would be universal, with communities that are already at greater risk of being undercounted – including people of color, young children, and low-income rural and urban residents – suffering the most. An untested citizenship question will drive up costs as the Census Bureau struggles to develop new communications and outreach strategies with little time remaining, 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. In sum, asking about citizenship status in a climate of fear and mistrust can only heighten suspicions, depress response rates, cost additional taxpayer money, and thwart an accurate, inclusive 2020 enumeration.

A full, fair, and accurate census is absolutely critical for our community. For the reasons discussed above, we strongly oppose asking about citizenship status in the 2020 Census and urge the Department of Commerce to remove the proposed citizenship question from the data collection forms.

Sincerely,

Shikha Bhatnagar  
Executive Director, South Asian Network  
Artesia, CA