



FIRST FOCUS

MAKING CHILDREN & FAMILIES THE PRIORITY

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August 2, 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-201-0005

Dear Ms. Jessup:

On behalf of First Focus, a bipartisan children's advocacy organization dedicated to prioritizing children in our federal policy and budget decisions, I am writing to offer comments on the 2020 Census proposed information collection in response to the June 8, 2018 *Federal Register* notice. Recognizing the unique circumstances associated with the decision to include a citizenship status question in the 2020 Census, my comments will focus on that topic.

I am extremely concerned that the addition of a citizenship question to the 2020 Census will jeopardize the accuracy of the census broadly and unacceptably compound the undercount of our nation's kids, a result that our children and our nation can ill-afford to live with for the next ten years. For this reason, I strongly urge you to remove the citizenship question from the 2020 Census.

The Census Bureau (Bureau) shoulders the awesome responsibility of managing an accurate count of more than 325 million people in America¹ - undoubtedly, no easy task. A particular concern stems from the unfortunate and unacceptable trend of undercounting our young children under age five. It is reported that more than one million children were missed in the last census in 2010.² And this problem continues to grow. In this year's *Kids Count Data Book*, The Annie E. Casey Foundation noted that approximately 4.5 million young children live in neighborhoods where they run a high risk of exclusion from the 2020 count.³ The count of young kids is becoming less accurate at the same time that the count of adults and older kids continues to improve.⁴

As we gain a better understanding of the reasons for the undercount of young children and take corrective action, we know that children of color, low-income kids and immigrant children are more likely to be

¹ U.S. Census Bureau, "U.S. World and Population Clock," last visited July 25, 2018, available at: <https://www.census.gov/popclock/>.

² Council for a Strong America, "An Accurate Census is Essential for a Strong America," November 9, 2017.

³ Annie E. Casey Foundation, 2018 Kids Count Data Book: State Trends in Child Well-Being, June 27, 2018, available at: <http://www.aecf.org/m/resourcedoc/aecf-2018kidscountdatabook-2018.pdf>

⁴ Barry-Jester, Anna Maria, "A Million Children Didn't Show Up In the 2020 Census. How Many Will Be Missing in 2020?," FiveThirtyEight, March 19, 2018.

overlooked. We also know that nearly 1.3 million children experience homelessness in the U.S. each year,⁵ with many more living in unstable housing situations. Children living in highly mobile households are more likely to be missed entirely by the census, as well as young children in households that are splitting time between parents, living with grandparents, or residing in multigenerational households.

Immigrant families with children and those in highly mobile situations are not only harder to locate, but less likely to share information with government officials based on fear of negative repercussions that include immigration enforcement actions from the U.S. Immigration and Customs Enforcement (ICE) agents and child welfare involvement.

Children of immigrants are the fastest-growing group of American children and currently one in four children in the U.S. has an immigrant parent.⁶ Due to the aggressive and cruel immigration enforcement policies currently being undertaken in this country, such as ICE raids in the interior of our country and the zero tolerance policy at our southern border, all immigrant families, regardless of their documentation status, are in fear of sharing personal information that can result in harassment and enforcement actions.

Therefore, the inclusion of a citizenship question would only exacerbate the undercount of young children in the 2020 census, and would adversely impact children of mixed status families and communities with large populations of immigrants by deterring participation and lowering the census response rate.

The undercount of children results in severe negative implications for our nation. As you know well, the U.S. Constitution requires an accurate count of the nation's population every ten years, and the successful implementation of the decennial census shapes far-reaching outcomes for some of the most vulnerable in our society. The government uses census-derived data to guide the allocation of hundreds of billions of federal dollars to programs benefitting children and low-income families. The census count also impacts private investment decisions that lead to economic development opportunities for our communities and determines the distribution of our congressional seats and fair political representation.

Risking the quality of the census data leads to particularly strong negative consequences for our nation's children, who disproportionately experience poverty in the U.S. In 2016, nearly 1 in 5 children were living in poverty, and while they make up 23 percent of the U.S. population, they account for 33 percent of the population living in poverty.⁷ Poverty is a particularly serious problem for children, who suffer harmful effects for the rest of their lives after living in poverty for even a short time. Children in poor families were four times more likely to be in fair or poor health, nine times more likely to experience food insecurity and twice as likely to repeat a grade and drop out of high school.⁸

Beyond the negative consequences of poverty for individual children are the costs that the entire nation pays when children grow up poor – from increased expenditures on criminal justice and healthcare to lost revenue and lower economic output when our nation's youngest citizens lack the support they need. Recent studies

⁵National Center for Homeless Education, "National Overview, Number of Homeless Children/Youth Enrolled in Public School by Year," data drawn from U.S. Department of Education's EDFacts Initiative, 2018, <http://profiles.nche.seiservices.com/ConsolidatedStateProfile.aspx>.

⁶ Migration Policy Institute, "Children in U.S. Immigrant Families," last visited July 25, 2018, available at: <https://www.migrationpolicy.org/programs/data-hub/charts/children-immigrant-families>

⁷ Baldari, Cara and Rachel Merker, A Snapshot of Children Living in Poverty: 2016, September 20, 2017, data analyzed from the U.S. Census Bureau Current Population Survey, Annual Social and Economic Supplements, Current Population Reports, Income and Poverty in the United States: 2016, available at: <https://firstfocus.org/resources/fact-sheet/a-snapshot-of-children-living-in-poverty-2016>.

⁸ Chaudry, Ajay and Wimer, Christopher, Poverty is Not Just an Indicator: The Relationship Between Income, Poverty and Child Well-Being, Child Poverty-Destruction of the Nation's Human Capital, Academic Pediatrics, Volume 16, Number 3S, April 2016, available at: [http://www.academicpedsjnl.net/article/S1876-2859\(15\)00383-6/fulltext](http://www.academicpedsjnl.net/article/S1876-2859(15)00383-6/fulltext).

show that child poverty costs the U.S. over \$1 trillion dollars annually, representing 5.4 percent of our gross domestic product.⁹

While the child poverty rate remains high in the U.S., it would be much higher if it were not for effective anti-poverty programs such as the Supplemental Nutrition Assistance Program (SNAP), the National School Lunch Program, housing subsidies, child care subsidies, Head Start and Early Start Programs and more. Yet we cannot understand the true need for these programs and how to allocate funds to implement them without an accurate count of children from the Census.

The well-being of our nation's children underpins a healthy economy. In the coming decades, the ratio of seniors to those of working age will be twice as great as it was in the 20th century. This means far fewer workers to support our economy and replace those who are retiring.¹⁰ This shift would be even more dramatic if it weren't for immigration, because grown children from immigrant families will account for about three-quarters of the growth in working-age population projected from 2020 to 2030.¹¹

Unfortunately, children continue to receive a declining share of total federal spending, with that number reaching an all-time low of 7.75 percent in Fiscal Year 2017.¹² And, experts estimate that federal spending on interest on the national debt will surpass spending on kids in two years.¹³ If we truly value our children, that must change. Robust federal investments in our children ensures that all our nation's children have an equal opportunity to reach their full potential and shortchanging programs that benefit children fails our future workforce. Everyone—regardless of socioeconomic status—benefits from strategies that lift children out of poverty, because these strategies are tied to economic gains that result in a strong and educated workforce.

I strongly oppose the addition of the proposed citizenship question in the 2020 Census as it sets the stage for the Bureau to fall far short of the comprehensive, accurate count that is foundational to our democracy, critical for our economic prosperity, paramount for our children's future and worthy of the public's confidence.

Sincerely,



Bruce Lesley
President

⁹ McLaughlin, Michael and Rank, Mark R., *Estimating the Economic Cost of Childhood Poverty in the United States*, Social Work Research, Volume 42, Issue 2, June 1, 2018, available at: <https://academic.oup.com/swr/article/42/2/73/4956930>.

¹⁰ Dowell Myers, *The New Importance of Children in America* (Palo Alto, CA: The Lucile Packard Foundation for Children's Health; Washington, DC: Children's Hospital Association, 2017), https://www.childrenshospitals.org/-/media/Files/CHA/Main/Research_and_Data/Pediatric_Health_Care_Trends/2017/the_new_importance_of_children_in_america_report_101217.pdf.

¹¹ *Ibid.*

¹² "Children's Budget 2017," *First Focus*, November, 2017.

¹³ Isaacs, Julia B; Lou, Cary; Hahn, Heather; Ovalle, Joyelyn; Steuerle, Eugene C., "Kids' Share 2017: Report on Federal Expenditures on Children through 2016 and Future Projections, Urban Institute, October 31, 2017.