



August 7, 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,

Thank you for the opportunity to comment on behalf of Colorado Nonprofit Association in response to proposed information collection related to the 2020 Census. Colorado Nonprofit Association is a membership association that represents over 1,300 charitable organizations in Colorado. Our mission is to lead, serve, and strengthen Colorado's nonprofit community to improve the quality of life throughout our state.

We ask that the Department of Commerce remove the question about immigration status from the 2020 Census form. We believe that reinstating a mandatory citizenship question will result in an undercount of Coloradans. Half of Colorado's counties had mail participation rates less than 60 percent in the 2010 Census according to Colorado's State Demography Office.¹ Asking for the immigration status of the nearly 20 percent of Coloradans who are foreign-born and/or have at least one immigrant parent, is likely to have a chilling effect on response rates in communities throughout our state.²

By proposing this question for all individuals in America two years before the 2020 Census, the Census Bureau has inadequate time to test the question adequately according to the Bureau's own Scientific Advisory Committee.³ Feedback from the Census Bureau's Committee on Racial, Ethnic and Other Populations in 2017 suggests that the question will have a negative impact on response rates as many respondents, whether documented or not, were visibly hesitant to answer questions or provide information about immigration status.⁴ The question is also unnecessary as the American Community Survey already collects this data, which could be used to support Secretary Ross' goal of increased compliance with voting rights laws.^{5 6}

The results of the 2020 Census are critical for Colorado's more than 23,000 nonprofits which work every day to improve people's lives, enliven our communities with faith and culture, and address societal problems. The Census provides information on the characteristics of our

¹ <https://drive.google.com/file/d/0B0m67XbcqVYRY05QTEF5LV9hRmM/view>

² https://www.americanimmigrationcouncil.org/sites/default/files/research/immigrants_in_colorado.pdf

³ http://www.pogoarchives.org/m/cp/POGO-CSAC-Recs-Spring_20180406.pdf

⁴ <https://www2.census.gov/cac/nac/meetings/2017-11/Meyers-NAC-Confidentiality-Presentation.pdf>

⁵ http://www.pogoarchives.org/m/cp/POGO-CSAC-Recs-Spring_20180406.pdf

⁶ https://www.commerce.gov/sites/commerce.gov/files/2018-03-26_2.pdf



communities and informs how Colorado's nonprofits can fully understand and serve the people in those communities.

As trusted messengers who frequently work with historically undercounted populations, Colorado's nonprofit community will play an active role in encouraging a complete count. Unfortunately, our efforts will likely be undermined if this citizenship question is included and people are hesitant to respond.

Having the most complete count possible ensures that Colorado also receives its fair share of federal assistance. Colorado received nearly \$8.1 billion in federal assistance, or nearly \$1,500 per capita, in FY 2015 based on 2010 Census data.⁷ This includes programs like Head Start, Medicaid, the Supplemental Nutrition Assistance Program, and other programs that help strengthen Colorado's families. Cuts to these federal programs would increase families' unmet needs without providing additional resources to help nonprofits meet this growth in demand for services.

Colorado is projected to gain an 8th Congressional seat due to 12 percent growth in the state's population.^{8 9} But this outcome could also be skewed if the citizenship question causes a substantial undercount.

Because a significant undercount due to the citizenship question would reduce funding for programs that support Colorado's families and increase burdens on nonprofits and local governments, we ask that the citizenship question is removed to ensure a fair, accurate, and complete enumeration for Census 2020.

Sincerely,

A handwritten signature in blue ink that reads "Mark Turner".

Mark Turner
Senior Director of Public Policy

⁷ <https://gwipp.gwu.edu/sites/g/files/zaxdzs2181/f/downloads/Colorado%2008-18-17.pdf>

⁸ https://www.electiondataservices.com/wp-content/uploads/2017/12/NR_Appor17c2wTablesMapsC1.pdf

⁹ <https://www.colorado.gov/pacific/dola/co-state-demography-office-provides-review-released-us-census-bureau-estimates>