



August 7, 2018

Dear Ms. Jessup,

On behalf of the Massachusetts Association of Community Development Corporations (MACDC), we urge the U.S. Department of Commerce to exclude the citizenship question from the proposed 2020 Census form. The inclusion of a question on citizenship status may well jeopardize the accuracy of the census reporting across communities in several states, and could easily lead to the diminution of representation, resources and services for the next decade if not longer.

*MACDC seeks to build and sustain a high performing and adaptive community development sector that is supported by private and public investment and sound public policies. We work with our members and others to advance racial and economic equity by creating places of opportunity where everyone can access housing that is affordable, benefit from economic opportunity and fully participate in the civic life of their community.*

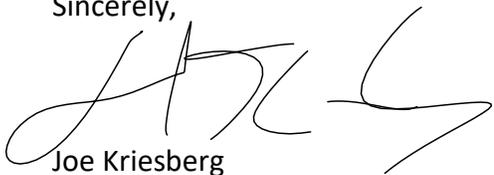
We believe that a fair and accurate census, and the collection of useful, objective data about our nation's total population is vitally important to an equitable determination of representation and distribution of resources. We understand that the Constitution requires an "actual enumeration" to determine how to apportion congressional seats based on citizenship. We also know that the Supreme Court has consistently ruled that states are allowed to use total population when drawing congressional districts, that federal law prohibits the Census Bureau from sharing information about individuals with other federal agencies, and that federal law does permit the Bureau to use demographic sampling and statistical modeling through the American Community Survey to allocate federal funding for infrastructure, research and financial support to each state.

MACDC is concerned that, at this time, the inclusion of citizenship question for the 2020 Census could deter millions of immigrants from filling out their mandatory surveys and further erode the accuracy of the total population count, thereby skewing not only the results necessary to determine future congressional representation but also the fair allocation of federal resources.

There are many people who share our concerns, including Census Bureau researchers who reported problems to an advisory committee in 2017– in field tests – for getting immigrants to complete the survey. There has been documented undercounting of African-American men and Latinos in the past two censuses. Taken together, the data from the researchers and the documented evidence of our recent past suggest we may be creating unnecessary risks to the reliability of the information by adding a citizenship question to the 2020 Census form, without undergoing the customary pretesting process that would predict how such changes might impact national response rates.

At this time, we are opposed to adding a citizenship question to the 2020 Census form and urge the Department of Commerce and the U.S. Congress to address these concerns in an appropriate manner.

Sincerely,

A handwritten signature in black ink, appearing to read 'JKS', written in a cursive style.

Joe Kriesberg  
President & CEO