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Gale A. Brewer, Borough President

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**Public Comment Submission to the U.S. Dept. of Commerce
from Manhattan Borough President Gale A. Brewer**

**Proposed Information Collection for 2020 U.S. Census
Docket No. USBC-2018-0005**

I write in response to the June 8th notice in the Federal Register requesting comments on the proposed information collection for the 2020 Census (Docket number USBC-2018-0005). As President of the Borough of Manhattan, I urge the Department of Commerce to withdraw the citizenship question from the 2020 Census questionnaire. I firmly believe this question's inclusion will significantly undermine efforts to achieve a fair and accurate census count in 2020.

As the elected president of the Borough of Manhattan, known also as New York County, I represent roughly 1.7 million residents, of whom an estimated 28 percent are foreign-born. Manhattan has numerous hard-to-count census tracts, particularly in low-income and immigrant communities, as well as in areas with concentrations of public housing. The citizenship question's inclusion will undermine the goal of an accurate and complete count in these already hard-to-count neighborhoods by spreading fear and anxiety among residents, leading to decreased response and participation rates.

The primary responsibility of the constitutionally-mandated census is an accurate and complete count, and new questions should not be added when they get in the way of this primary duty. My experience with past decennial census efforts has been that the Department of Commerce's U.S. Census Bureau worked diligently to cultivate messaging and a questionnaire that were inclusive to all, in order to promote the trust and participation necessary to conduct a full and accurate count. The addition of a controversial, unnecessary and untested citizenship question threatens to do the opposite, exacerbating undercounts in my populous county.

The citizenship question will serve to depress the response rates of citizen and non-citizen alike. Here in New York County, many residents from all backgrounds and walks of life who are citizens or documented residents have deep social, familial, and household ties to persons with uncertain immigration status. This reality will make many individuals pause before completing the census form and potentially avoid participating altogether. Households may also choose to simply skip the citizenship question, contributing to incomplete submissions and increased item-nonresponses which undermine the integrity of the data collected and impose other operational costs.

I cannot stress enough: many Manhattanites are simply opposed to and suspicious of the decision to add a citizenship question. Especially at a moment when many Manhattan residents believe – and not without cause – that immigration enforcement is being politicized, and there is a growing fear and mistrust of the federal government, it is important to avoid actions that exacerbate those fears and worsen Census undercounts. Such undercounts would have a disproportionate impact on hard-to-count communities, and in effect would deprive children and families in those communities of the critical resources they need for healthcare, education and infrastructure, as well as proper representation in government.

I agree with the conclusions reached by the Government Accountability Office, ten former Census Bureau directors from both Republican and Democratic administrations, and the Census Bureau's Chief Scientist, who have all warned against including an untested citizenship question on the decennial census. This warning is particularly relevant in 2020 because the U.S. Census Bureau is experimenting, for the first time, with a large-scale transition from mail-in paper questionnaires to online submissions. Due to this transition to Internet-based online submissions, the 2020 Census is already dealing with high-risk operational challenges in terms of cyber-security, online fraud, Internet connectivity, and platform operability. Now is not the time to compound these risks by adding an untested citizenship question.

Lastly, I intend to be a Census partner and convene a “complete count committee” to assist with the Census 2020 effort. However, the specter of the citizenship question is making it increasingly difficult for me to recruit and cultivate stakeholders for this purpose, due to reasonable concerns that the question is intended to identify and target undocumented residents. Therefore, there is noticeable hesitancy among community-based organizations, nonprofits, faith-based institutions and trusted community leaders to fully buy in and promote participation if the citizenship question remains. I also want to point out that I am an avid user of Census data to ensure demographic representation in local Community Boards and develop district needs profiles. Both tasks are mission-critical for local governance, and both will be more difficult if Census data are rendered less reliable by the inclusion of this question.

For all the reasons outlined, I urge you to withdraw the citizenship question from the 2020 Census and instead focus on bringing all communities into this effort, so that we may obtain an accurate and complete head count that is fully reflective of America's population and promise.

Thank you for your attention to my comments. If you have any further questions or need any further information from the Office of the Manhattan Borough President, please contact Deputy Borough President Aldrin Rafael Bonilla at abonilla@manhattanbp.nyc.gov or 212-669-3877.

Gale A. Brewer

A handwritten signature in black ink that reads "Gale A. Brewer". The signature is written in a cursive, flowing style.

Manhattan Borough President