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[UPDATED]

Statement of Former Census Directors on Adding a New Question to the 2010 Census

As former directors of the U.S. Census Bureau, serving under both Republican and Democratic Administrations, we are greatly troubled by the proposal (an amendment to the Fiscal Year 2010 Commerce, Justice, and Science Appropriations bill) to add a new question on citizenship and immigration status to the 2010 census. We can say unequivocally that adding an untested question at this late point in the decennial process would put the accuracy of the enumeration in all communities at risk and would likely delay the start of the census and all subsequent activities, such as reapportionment of the House of Representatives and reporting of detailed population figures under Public Law 94-171.

Research, testing, design, planning, and preparation for a decennial census are an enormous challenge. Preparations for a decennial are complex, with each component related to and built upon previously tested and completed design features. By the fall before the census starts, the process is on "auto-pilot": final questionnaires are rolling off the presses, Local Census Offices are opening and preparing to recruit and train hundreds of thousands of census takers, and paid media is ready to launch. Data capture and processing equipment is designed for the current questionnaire.

Title 13, United States Code, requires the Census Bureau to submit to Congress the topics and actual questions it will include, three and two years, respectively, before Census Day. There are sound reasons for this long lead-time: It is highly risky to ask an untested question, as the proposed addition would be. (The American Community Survey only asks if respondents are U.S. citizens, not if they are in the country lawfully.) The effect on data quality is completely unknown, as are the consequences for participation among all immigrants, regardless of their legal status. We could foresee, for example, problems during door-to-door visits to unresponsive households, when a legalized "head of household" would avoid enumerators because one or more other household members are present unlawfully.

Adding a new census question now would require redesigning and reformatting questionnaires (an addendum or post card is likely to be confusing and

completely ineffective, as well as a processing nightmare) and all related materials, such as language assistance guides and web-based instructions; redesigning instructions and training manuals for more than a million temporary census workers; reconfiguring or rebuilding data capture and processing software, which is designed for the specific questionnaire already in place; and revising a \$400 million outreach and promotional campaign, much of it already deployed, which highlights the new short form's ten questions and often confirms that the census does not ask about immigration status. *Such a massive revision could not be accomplished in time to conduct the census on its currently envisioned schedule, thus placing all previous decisions and preparations in jeopardy, since they are tied to an April 1, 2010 Census Day. The resulting cost to the taxpayer is almost incalculable, since the Census Bureau has already spent at least \$7 billion to prepare for the decennial enumeration.*

In short, we urge the Senate and the Congress to address concerns about the universe for apportionment at an appropriate point in the decade, when the Census Bureau can still have a useful dialogue with lawmakers about meeting congressional intent without jeopardizing the accuracy and fairness of the population count. Less than six months before Census Day, and only several months before the count starts, is not the time to place a decade of careful and demanding preparations at risk.

Vincent P. Barabba (1973-1976; 1979-1981)

Bruce Chapman (1981-1983)

Barbara Everitt Bryant (1989-1993)

Kenneth Prewitt (1998-2001)

Charles Louis Kincannon (2002-2008)

Steven H. Murdock (2008-2009)