

**Committees on Economic Statistics and Government Relations  
American Economic Association**

August 6, 2018

Ms. Jennifer Jessup  
Departmental Paperwork Clearance Officer  
Department of Commerce  
Room 6616 14th and Constitution Avenue NW  
Washington, DC 20230

Re: Docket No. USBC-2018-0005 (Comments submitted electronically via regulations.gov)

Dear Ms. Jessup,

Thank you for the opportunity to comment on proposed plans for the 2020 Decennial Census. Members of the American Economic Association (AEA), representing over 20,000 economists from business, government and academia, rely on the availability of accurate, scientifically credible data from Census Bureau surveys. Our comments address aspects of the proposed 2020 Census that affect data quality.

Accurate statistics from Decennial Censuses form the raw data for research studies that yield socially important findings across many areas of economics. The Decennial Census creates the sampling frame used for more detailed surveys by the Census Bureau and the Bureau of Labor Statistics, including the American Community Survey and Current Population Survey. These detailed surveys provide the data to study a broad range of public policies and to quantify the many factors that affect the U.S. economy and the well-being of American families and businesses. The Decennial Census is also used by the private sector in designing their own surveys. The soundness, comprehensiveness, and accuracy of the Decennial Census affects research findings and the many private sector users of the Census for an entire decade.

Accurate address canvassing is essential to ensure a complete Census. The utilization of administrative records can improve address canvassing and thus improve the quality of the Decennial Census survey information. Non-response follow up (NRFU) is critical to assure a complete and comprehensive count. The plans on these aspects of the 2020 Census as presented in the Notice seem appropriate. At the same time, the quality of data collected via follow up depend upon taking actions that maximize initial response rates and minimize the need for follow up.

The proposed inclusion of a citizenship question late in the process of planning and preparation for the 2020 Census raises concerns about its impact on response rates. The extent to which the question would reduce response rates and associated data quality is not known. On the one hand, existing evidence based on past citizenship questions on household surveys suggests that the risk is not high. For example, item non-response rates to citizenship questions on the American Community Survey in recent years are not much different from other questions such as those on marital status or wages and income (although there is evidence that non-response rates to citizenship questions are higher for Hispanics and non-Hispanic Blacks). On the other hand, it is difficult in the absence of a field test to know the impact of adding this question on the overall individual response rate and accuracy of the 2020 Census. A substantial decline in response rates would have large cost implications for the Decennial Census since the NRFU costs billions of dollars, and could have implications for accuracy. We view this as a case of an

unknown probability of a substantial, long-lived adverse effect on the accuracy of a vital source of information about the U.S. population.

Thank you for taking our concerns into account.

Sincerely,

*John C. Haltiwanger*

John C. Haltiwanger, Chair  
AEA Committee on Economic Statistics, and  
Professor of Economics, University of Maryland

*Phillip L. Swagel*

Phillip L. Swagel, Chair  
AEA Committee on Government Relations, and  
Professor, School of Public Policy,  
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Among the members of the AEA Committees on Economic Statistics and Government Relations who endorse this Comment are the following individuals. (Members of these Committees who are government employees are recused from the endorsement.)

**John Cawley**, Member, AEA Committee on Economic Statistics, and Professor, Department of Policy Analysis and Management and Department of Economics, Cornell University.

**Carol Corrado**, Member, AEA Committee on Economic Statistics, and Senior Advisor and Research Director, Economics Program, The Conference Board

**Leemore Dafny**, Member, AEA Committee on Government Relations, and Professor of Business Administration, Harvard Business School

**Janice C. Eberly**, Member, AEA Committee on Economic Statistics, and James R. and Helen D. Russell Professor of Finance, Kellogg School of Management, Northwestern University

**Martin Gaynor**, Member, AEA Committee on Economic Statistics, and EJ Barone University Professor of Economics and Public Policy, Carnegie Mellon University

**Maurine Haver**, Member, AEA Committee on Government Relations, and President, Haver Analytics

**Susan Houseman**, Member, AEA Committee on Government Relations, and Vice-President and Director of Research, The Upjohn Institute.

**Bruce Meyer**, Member, AEA Committee on Government Relations, and the McCormick Foundation Professor at the University of Chicago Harris School of Public Policy

**Edward B. Montgomery**, Member, AEA Committee on Economic Statistics, and President, Western Michigan University

**Emi Nakamura**, Member, AEA Committee on Economic Statistics, and Chancellor's Professor of Economics, University of California, Berkeley

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