

July 24, 2018

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

Submitted [via regulations.gov](https://www.regulations.gov)

RE: Comments on Proposed Information Collection on 2020 Census

On behalf of Philanthropy California and the League of California Community Foundations, we write in response to the June 8, 2018 notice in the Federal Register requesting comments on the 2020 Census proposed information collection. **We urge the Department of Commerce to withdraw the citizenship question from the 2020 Census questionnaire, as it will significantly undermine efforts to achieve a fair and accurate census.** Philanthropy has a unique perspective on why an accurate Census is vital to all communities, urban and rural, regardless of the size of their immigrant populations. The 2020 Census is vitally important to every community, large and small, urban and rural.

Philanthropy California is an alliance of Northern California Grantmakers, San Diego Grantmakers, and Southern California Grantmakers. Our combined membership represents more than 500 foundations, corporate funders, philanthropy individuals and families, giving circles, and government agencies. Our members invest more than \$7 billion every year to support communities across California, the country, and worldwide.

The League of California Community Foundations consists of more than 30 member foundations. Community foundations are tax-exempt public charities serving people who share a common interest in improving the quality of life in their geographic area. In 2016, League members granted \$2.0 billion to community-based organizations working across a wide range of focus areas and administered \$15.7 billion in charitable assets.

Philanthropy stewards the community's endowment, ensuring that during difficult economic times, funds are available to meet local needs. With deep relationships with community partners, philanthropy helps donors to learn about emerging issues, needs and opportunities and the local nonprofits making a difference in their community. As a critical complement to public funding, philanthropic investments are best maximized when there is an accurate decennial census.

Since 1790, the Census Bureau has conducted a count of the country's population every 10 years, as required by the Constitution. In conjunction with this count, the American Community Survey (ACS) gathers more detailed information on the changing economic and social conditions of the population. These programs are crucial for informing policymakers, apportioning Congressional seats, drawing district lines, and distributing nearly \$700 billion in federal funding each year for health care, education, development, transportation, housing, civil rights enforcement, and much more.

As the philanthropic hub in our communities, we bring together the financial resources of individuals, families, and businesses to support charitable organizations dedicated to improving the lives of those

most in need. We know a fair and accurate Census is a crucial prerequisite for serving the needs of underserved communities. Past Censuses have tended to undercount communities of color, people in poverty, young children, and rural residents. The systematic undercounting of these communities decreases their access to federal funding and accurate Congressional representation.

Many of the programs that help to mend the gaps in our society and allow all to live in dignity depend on data from the Census. An accurate Census is vital for funding of:

- Rural business and industry development loans
- Job training and other employment programs
- Health care for infants and children
- Child care for working families
- Water and waste disposal systems
- Policing agencies and community-based entities working to reduce crime
- Monitoring and enforcing discrimination laws under the Civil Rights Act
- Local agencies for food, health care, and legal services for senior citizens and individuals with disabilities

Because an accurate Census is so vital to communities all across California we oppose the proposed addition of a question on citizenship, because it will reduce response rates and affect public programs in communities large and small. The issue of citizenship and the Census is entirely separate from current controversies over illegal immigration and how immigration laws should be changed. We are concerned adding the citizenship question would seriously threaten Census accuracy and substantially increase costs while decreasing participation, which will harm the vulnerable populations we are here to serve.

Thank you for your attention to our comments.

Sincerely,

Christine Essel
President and Chief Executive Officer
Southern California Grantmakers

Nancy Jamison
President and Chief Executive Officer
San Diego Grantmakers

Ellen LaPointe
President and Chief Executive Officer
Northern California Grantmakers

Mary O'Connell
Executive Director
League of California Community Foundations