



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

Dear Ms. Jessup,

Philanthropy Ohio is responding 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, and do everything within its power to ensure a full count, counting everyone once and only once and in the right place.

Philanthropy Ohio is a statewide association that provides the network, tools and knowledge to help people engaged in philanthropy become more effective, powerful change agents in their communities. We serve 1,775 staff and trustees affiliated with over 200 foundations, grantmaking public charities, government funders, federated funds, individuals and other organizations engaged in philanthropy. We have worked over the past two years with members of Ohio's congressional delegation to urge them to fully fund the Census and help them understand the importance of the decennial count, both for Ohio and for the state's private funders.

Why does Ohio need an accurate, reliable and fair count?

- To assure a fair, proportionate representation in Congress;
- To help community and business leaders plan to address emerging social service, business and infrastructure needs;
- To bring adequate federal funding for education, health care, housing, food and income security and rural access to broadband;
- To help funders make good decisions about where to best allocate their scarce resources; and
- To assist nonprofits to better serve communities.

Why do funders need an accurate, reliable and fair count? Funders rely on a full, accurate Census count in order to:

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Suzanne T. Allen, Ph.D.
President & CEO



- Identify community needs and demographic trends that inform long-term plans and grants;
- Measure impact - which drives many of the foundation's investment decisions; and
- Tell the story of foundation and partner impacts.

For example, the Nord Family Foundation uses the American Community Survey and Census data to drill down by county and city to determine unique community needs for proposals it receives and to inform its trustees of unmet needs or gaps in service. For example, in education, the foundation wanted to know how many degrees were held by Lorain County residents; the ACS tables quickly and easily produced educational attainment data for the county, revealing numbers for high school diploma, associates, bachelors and Ph.Ds. Without ACS, the foundation would have to cull through local data sources to come up with that information. To maintain a similar level of accuracy, thoroughness and detail without the decennial count and ACS, foundations would have to invest significant dollars that would detract from their ability to address critical social and economic issues.

Given the widespread use and reliance upon Census data, it is imperative that the 2020 count is funded and managed so as to ensure a full and accurate count. We believe that including the citizenship question on the 2020 Census questionnaire will result in further undercounting of those that research shows are historically undercounted: communities of color and young children. Additionally, including the citizenship question at this late date also means that it cannot be tested, and that is a recipe for disaster. The Census Bureau conducts careful, costly research over a period of many years to develop the census questions and the addition of a new, untested question adds a significant risk to the success of the count.

For these reasons, we call upon Secretary Ross and the Census Bureau to remove the citizenship question and move ahead with plans that will result in a fair, full, accurate count.

Sincerely,

Suzanne T. Allen, Ph.D.
President & CEO

Claudia Y.W. Herrold
Senior Vice President

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