

## **Summary of Comments Received on the 2020 Census Federal Register Notice**

(Vol. 83, No. 111, pp. 26643-26653, FR Doc No. 2018-12365), June 8, 2018

The Census Bureau received 147,831 documents with comments on the 2020 Census Presubmission Federal Register Notice. Public comments could be posted on regulations.gov, emailed to the Department of Commerce, or mailed to the Department of Commerce. Some comments were received through multiple means, and thus were duplicates. Some comments represented multiple organizations, respondents, or signers. In addition, some organizations joined in different configurations to submit different sets of comments related to the areas of interest to the organizations. Finally, some commenters had comments on multiple topics. There were 148,443 total comments. This total reflects only received comments within documents, not the number of signers of petitions or individuals represented by organizations or governments. In addition, comments received through multiple modes were not de-duplicated for these counts.

All comments could be posted externally once received into the Federal Docket Management System. Comments initially collected on regulations.gov were posted by the Federal Docket Management System docket managers. Comments received by mail were scanned and uploaded to the Federal Docket Management System, where the resulting documents were named according to commenter or commenting organization and then posted to regulations.gov.

Comments received through email required additional steps before posting. A Portable Document Format (PDF) version of the email was required for uploading into the Federal Docket Management System. Many of the emailed comments were responses to a template document where the responder filled in only information such as their name. When these situations were identified, the comments were grouped into the same folder for posting. Because of size limitations for this type of document, folders were capped at 2,000 documents. These folders were named according to the organization that provided the template—if one could be identified—followed by the main topic of the

comment. After this naming convention was applied to the folders, a number was added if there were more than 2,000 comments on that topic, hence more than one such folder. For example, folders named “Action Network – Oppose Untested Question on Citizenship” represent a comment using a template from the Action Network with the main topic of opposition to use of an untested question about citizenship. As shown in Table 1 below, there are 13,066 comments using this template. These were spread across seven folders because of the size limitations described above. Totals for these folder consolidations are shown in Table 1. For this reason, the number of comments that is shown in regulations.gov is different from the number of comment documents received. One folder of these PDFs appears as only one comment in regulations.gov.

Table 1 – Folder Names and Counts for Email Comments

<b>Folder name</b>	<b>Counts by Folder Name</b>	<b>Count of Documents in regulations.gov</b>
Action Network - Asian Americans Opposed to Citizenship Question	2,314	2
Action Network - Census Data Too Important to Include Citizenship Question	7,489	4
Action Network - Insufficient Testing of Citizenship Question	7,461	4
Action Network - Legal Challenges Raise Concerns about Citizenship Question	7,369	4
Action Network - Oppose Adding Citizenship Question	313	1
Action Network - Oppose Efforts to Include Untested Question	235	1
Action Network - Oppose Untested Question on Citizenship	13,066	7
Action Network - Opposition to Citizenship Question	6,868	4
American Citizen Living Abroad - Oppose Citizenship Question	26	1
As a Resident of Florida	943	1
Census Data is Too Important - Oppose Citizenship Question	7,502	4
Color of Change - Oppose Citizenship Question for Marginalized Communities	168	1
Everyactioncustom - Oppose Citizenship Question	98	1
League of Women Voters (Against Citizenship Question)	11	1
Make the Road PA (Against Citizenship Question)	54	1
Oppose Citizenship Question - individual comments	2,235	2
Stop the Census Citizenship Question DOC Emails	247	1
Strongly Urge Commerce Department to Remove Citizenship Question	12,034	7
Supporter of Arts and Culture - Oppose Citizenship Question	225	1
<b>Total Number of Emailed Comments</b>	<b>68,658</b>	<b>48</b>

Of the total number of comments, 137,695 comments—more than 90 percent—were related to the inclusion of the citizenship question. Table 2 shows the percentage of comments for and against this question, both within the comments related to the question and out of all comments. Some commenters did not completely specify the topic of their comment, only expressing whether they were for or against. If the meaning could be inferred from other included content, the comment was classified as presumed for or against the citizenship question, respectively. Table 2 gives the breakdown of comments related to the inclusion of the citizenship question.

Table 2 – Percents Within Comments Related to the Citizenship Question

Comments Related to Citizenship Question	Count of Comments	Percent Total Within Citizenship Question Comments*	Percent Total Within all Comments*
Against Citizenship Question	136,216	98.9	91.8
Presumed Against Citizenship Question	238	0.2	0.2
<b>Total Against Citizenship Question</b>	<b>136,454</b>	<b>99.1</b>	<b>91.9</b>
For Citizenship Question	1,217	0.9	0.8
Presumed For Citizenship Question	24	<0.1	<0.1
<b>Total For Citizenship Question</b>	<b>1,241</b>	<b>0.9</b>	<b>0.8</b>
<b>Total Comments on Citizenship Question</b>	<b>137,695</b>	<b>100.0</b>	<b>92.8</b>
<b>Total Comments</b>	<b>148,443</b>	<b>NA</b>	<b>100.0</b>

\* Differences may occur because of rounding.

Remaining comments are described below. In particular, there were nearly 10,000 comments—6.4 percent—requesting the removal of checkboxes to identify Asian countries of origin. The current race and ethnicity questions do not represent a change from either of the two previous censuses, resulting from the standards for federal government of data collections regarding the race and ethnicity question set by the Office of Management and Budget (OMB) in 1997. The major categories of comments other than about the citizenship question can be classified as follows:

- Race and ethnicity (as above, these standards are set by OMB).
- Requests for additional questions to be included in the census:

- o In particular, requests for inclusion or exclusion of a question about sexual orientation and gender identity (SOGI).
- Data collection methods, including comments both for and against the internet questionnaire option.
  - o A subcategory of these reflected concerns about potential undercounts of young children given the new design for data collections, including internet response and automation for the Nonresponse Followup operation.
- Field Reengineering, with concerns about fewer census offices than in previous censuses and in favor of hiring local staff.
- Requests that citizenship data not be included on redistricting files or shared with the National Conference of State Legislatures.
- Concerns about Reengineered Address Canvassing resulting in an address list with undercoverage of certain categories of housing.

In addition, there were various comments about other topics less directly connected to the census as described (classified below as other); comments for which the content was not clear (classified below as unclear); and comments that were not directly related to the census, such as comments about politics or the electronic collection of comments (classified below as out of scope). In Table 3 we show the total number of counts for these major categories and the notable subcategories described above.

Table 3 – Total Count of Comments by General Topic

Topic	Topic Count	Topic Percentage *
<b>Citizenship Question</b>	<b>137,695</b>	<b>92.8</b>
Against Citizenship Question	136,216	91.8
Presumed Against Citizenship Question	238	0.2
For Citizenship Question	1,217	0.8
Presumed For Citizenship Question	24	<0.1
<b>Asian Checkboxes Question</b>	<b>9,595</b>	<b>6.5</b>
Against Asian Checkboxes	9,540	6.4
For Asian Checkboxes	55	<0.1
<b>Race and Ethnicity Questions</b>	<b>202</b>	<b>0.1</b>
<b>SOGI Question</b>	<b>112</b>	<b>0.1</b>
For SOGI Question	63	<0.1
Against SOGI Question	33	<0.1
Other SOGI comments	16	<0.1
<b>Other Questions Requested</b>	<b>38</b>	<b>&lt;0.1</b>
<b>Data Collection Methods</b>	<b>128</b>	<b>0.1</b>
Internet subtopic	47	<0.1
Prisoners subtopic	4	<0.1
Undercount of Young Children	53	<0.1
Other Data Collection comments	24	<0.1
<b>Field Reengineering</b>	<b>6</b>	<b>&lt;0.1</b>
<b>Redistricting Data File</b>	<b>127</b>	<b>0.1</b>
Against changes to redistricting files	12	<0.1
Add Citizenship to PL 94-171 files	1	<0.1
Opposed to sharing citizenship data with the National Conference of State Legislatures	114	0.1
<b>Address Canvassing</b>	<b>8</b>	<b>&lt;0.1</b>
<b>Other</b>	<b>180</b>	<b>0.1</b>
<b>Unclear</b>	<b>105</b>	<b>0.1</b>
<b>Out of Scope</b>	<b>247</b>	<b>0.2</b>
<b>Total</b>	<b>148,443</b>	<b>100.0</b>

\* Differences may occur because of rounding.