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August 6, 2018

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

RE: Proposed Information Collection; Comment Request; 2020 Census  
Docket # USBC-2018-0005; 83 FR 26643

Dear Ms. Jessup:

On behalf of the American Library Association (ALA),<sup>1</sup> we appreciate the opportunity to comment on the Census Bureau's proposed information collection for the 2020 Census.

America's libraries provide access to the wealth of statistical data published by the Census Bureau by helping businesses, government agencies, community organizations, and researchers to find and use Census data. The data resulting from the 2020 Census will inform innumerable decisions that will be made by those data users, such as where to locate businesses and public services best suited to local demographics. As partners in providing access to and supporting meaningful use of Census data, libraries promote the highest possible quality and completeness of the data.

In addition, America's libraries provide information about the Census to respondents. This role will have even greater significance in the 2020 Census in light of the new internet self-response option. America's libraries are the leading source of free public access to the internet and

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<sup>1</sup> The American Library Association (ALA) is the foremost national organization providing resources to inspire library and information professionals to transform their communities through essential programs and services. For more than 140 years, the ALA has been the trusted voice for academic, public, school, government and special libraries, advocating for the profession and the library's role in enhancing learning and ensuring access to information for all.

technology training. As a result, libraries can assist respondents in navigating the new internet self-response option in order to facilitate a complete and efficient count.

ALA offers the following comments on the Bureau's obligations under the Paperwork Reduction Act (PRA) regarding the 2020 Census:

1. Including a citizenship question would reduce the practical utility of the information collection
2. Collaborating with libraries to inform respondents would reduce the burden on respondents and reduce cost to the Federal Government
3. Maximizing usability of the internet self-response instrument would reduce the burden on respondents and reduce cost to the Federal Government

### **1. Including a citizenship question would reduce the practical utility of the information collection**

ALA urges the Bureau to remove the proposed question regarding citizenship from the 2020 Census questionnaire,<sup>2</sup> as including the question would reduce the practical utility of the information collection.<sup>3</sup>

For the thousands of businesses, government agencies, community organizations, and researchers that use Census data, the practical utility of the information collected in the 2020 Census relies upon the completeness and quality of the data. However, available evidence predicts that including a citizenship question in the 2020 Census questionnaire would suppress and distort response to the Census,<sup>4</sup> which would weaken the quality and completeness and thus the practical utility of the information collected. Including a citizenship question, therefore, would be contrary to the purposes of the PRA.<sup>5</sup>

In addition, we echo the comments of the Leadership Conference on Civil and Human Rights and others that the proposed citizenship question *itself* does not have practical utility and therefore

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<sup>2</sup> 83 FR 26646.

<sup>3</sup> See 44 U.S.C. § 3506(c)(2)(A)(i).

<sup>4</sup> See, e.g., John M. Abowd, "Technical Review of the Department of Justice Request to Add Citizenship Question to the 2020 Census," U.S. Census Bureau, January 19, 2018, *available at* <http://www.osec.doc.gov/opog/FOIA/Documents/AR%20-%20FINAL%20FILED%20-%20ALL%20DOCS%20%5bCERTIFICATION-INDEX-DOCUMENTS%5d%206.8.18.pdf#page=1289> (predicting that the inclusion of a citizenship question would have "adverse impact on self-response and, as a result, on the accuracy and quality of the 2020 Census").

<sup>5</sup> 44 U.S.C. § 3501(2) and § 3501(4) (establishing that the purposes of the Paperwork Reduction Act are to "ensure the greatest possible public benefit from and maximize the utility of information created, collected, maintained, used, shared and disseminated by or for the Federal Government" and "improve the quality and use of Federal information to strengthen decisionmaking, accountability, and openness in Government and society").

including the question would unnecessarily increase the burden on respondents and increase the cost to the Federal Government,<sup>6</sup> contrary to the purposes of the PRA.<sup>7</sup>

## **2. Collaborating with libraries to inform respondents would reduce the burden on respondents and reduce cost to the Federal Government**

ALA urges the Bureau to continue outreach to and collaboration with libraries to inform respondents about the 2020 Census and expand technology access to the internet self-response option, which would reduce cost to the Federal Government and burden on respondents.<sup>8</sup>

In the notice, the Bureau indicates its goal “to generate the largest possible self-response” and its plans to do so by “making it easier for people to respond ... by providing an internet questionnaire and using mailings, questionnaire delivery, advertising, and publicity to tell the public about this option.”<sup>9</sup>

Libraries provide information to Census respondents that can facilitate their response to the Census questionnaire. For instance, in the 2010 Census, libraries hosted more than 6,000 Census Bureau sites for outreach to respondents.<sup>10</sup>

Libraries’ role in facilitating Census response is likely to be even more pronounced in the 2020 Census with the new internet self-response option. More than 24 million Americans do not have high-speed internet at home,<sup>11</sup> and these persons are disproportionately likely to be older adults, rural residents, racial minorities, and those with lower levels of education and income.<sup>12</sup> Many of these residents, as well as those who have lower online skills or comfort, come to libraries for access to and assistance using the internet.

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<sup>6</sup> The Leadership Conference on Civil and Human Rights, et al., “Comments on Proposed Information Collection on 2020 Census, Docket # USBC-2018-0005,” comments to the Commerce Department, August 1, 2018, *available at* <https://civilrights.org/leadership-conference-comments-on-proposed-information-collection-on-2020-census-docket-usbc-2018-0005/>. ALA signed these comments.

<sup>7</sup> 44 U.S.C. § 3501(1) and § 3501(5) (establishing that the purposes of the Paperwork Reduction Act are to “minimize the paperwork burden for individuals ... resulting from the collection of information by or for the Federal Government” and “minimize the cost to the Federal Government of the creation, collection, maintenance, use, dissemination, and disposition of information”).

<sup>8</sup> *See* 44 U.S.C. § 3506(c)(2)(A)(iv).

<sup>9</sup> 83 FR 26645.

<sup>10</sup> Libraries hosted 4,607 Questionnaire Assistance Centers and 1,400 Be Counted sites. Arnold Jackson, “2010 Census Be Counted and Questionnaire Assistance Center Assessment Report,” U.S. Census Bureau, May 22, 2012, at 27, *available at* [https://www.census.gov/2010census/pdf/2010\\_Census\\_BC-QAC\\_Assessment.pdf](https://www.census.gov/2010census/pdf/2010_Census_BC-QAC_Assessment.pdf).

<sup>11</sup> Federal Communications Commission, “2018 Broadband Deployment Report,” February 2, 2018, *available at* <https://www.fcc.gov/reports-research/reports/broadband-progress-reports/2018-broadband-deployment-report>.

<sup>12</sup> Pew Research Center, “Internet/Broadband Fact Sheet,” February 5, 2018, *available at* <http://www.pewinternet.org/fact-sheet/internet-broadband/>.

With nearly 17,000 public library locations, in addition to school, college, and other libraries, America's libraries provide a national infrastructure for community information. These libraries have a broad and diverse reach: an analysis of the quintile of Census tracts that had the lowest mail response rates in the 2010 Census found that a public library is located within five miles of 99% of these hard-to-count Census tracts, and within a single mile of 79% of these tracts.<sup>13</sup>

If libraries are equipped with relevant information and resources, they will be best positioned to provide information to Census respondents about the new internet self-response option, which would reduce the burden<sup>14</sup> on respondents. By reducing the burden on respondents, the Census Bureau would facilitate self-response and thereby reduce the cost to the Federal Government to collect the information.<sup>15</sup> ALA echoes the Senate Appropriations Committee in encouraging the Census Bureau to collaborate with libraries to facilitate self-response,<sup>16</sup> which would advance the purposes of the PRA.<sup>17</sup> ALA appreciates the Bureau's efforts to date to collaborate with libraries and looks forward to increasing collaboration in the approach to 2020.

### **3. Maximizing usability of the internet self-response instrument would reduce the burden on respondents and reduce cost to the Federal Government**

ALA urges the Bureau to maximize the usability of the internet self-response instrument, which would reduce the burden on respondents.<sup>18</sup>

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<sup>13</sup> Analysis by the CUNY Mapping Service at the Center for Urban Research, City University of New York.

<sup>14</sup> Under the PRA, "burden" includes the time that respondents expend in order to adjust to a new response method. 44 U.S.C. § 3502(2) (defining that "burden" means time, effort, or financial resources expended by persons to generate, maintain, or provide information to or for a Federal agency, including the resources expended for ... adjusting the existing ways to comply with any previously applicable instructions and requirements").

<sup>15</sup> U.S. Census Bureau, *2020 Census Operational Plan*, Version 3.0, September 2017, available at <https://www2.census.gov/programs-surveys/decennial/2020/program-management/planning-docs/2020-oper-plan3.pdf>, at 8 ("It costs significantly less to process a response provided via the Internet or through a paper form than it does to send a fieldworker to someone's home to collect their response.").

<sup>16</sup> Senate Report No. 115-275, June 14, 2018, at 17 ("The Committee urges the Census Bureau to conduct outreach to public libraries and other community technology centers to ensure that they are fully informed about the Internet self-response option for the 2020 Decennial Census and equipped to support residents in census participation. The Bureau should work with libraries, in coordination with the Institute of Museum and Library Services, as part of the overall strategy to maximize survey response.").

<sup>17</sup> 44 U.S.C. § 3501(1) and § 3501(5) (establishing that the purposes of the Paperwork Reduction Act are to "minimize the paperwork burden for individuals ... resulting from the collection of information by or for the Federal Government" and "minimize the cost to the Federal Government of the creation, collection, maintenance, use, dissemination, and disposition of information").

<sup>18</sup> See 44 U.S.C. § 3506(c)(2)(A)(iv).

In the notice, the Bureau remarks, “The internet self-response instrument and all related support systems will be designed to handle the volume of responses that are expected to be received by internet in the 2020 Census. It is imperative that the application and systems service the scale of the operation in order to ensure that users do not experience delays while completing the survey or unavailability of the application.”<sup>19</sup>

In addition to that issue, the ease of using the internet self-response instrument also should be considered essential in encouraging respondents’ successful completion of the internet self-response option. If the internet self-response instrument is simple and intuitive for users with diverse needs across a variety of technology platforms, it will reduce the time and effort necessary to complete the questionnaire, reducing the burden on respondents. As the Bureau has noted, “making it easier for people to respond” will help “generate the largest possible self-response”;<sup>20</sup> therefore, maximizing usability (e.g., through user-centered design and early usability testing) would facilitate self-response and thereby reduce the cost to the Federal Government.<sup>21</sup>

In particular, if respondents using the internet self-response option in a library encounter difficulties using the instrument, it will take more time to complete the questionnaire, and the respondent will be more likely to ask library staff for assistance. As the number of public access computers in libraries and the time of library staff are both limited, the greater the difficulty using the internet self-response instrument, the greater the drain will be on library resources, impacting libraries’ ability to serve other Census respondents, as well as other library users. Library staff have extensive (and often negative) experience aiding the public in using (often poorly designed) e-government websites,<sup>22</sup> and can share their unique perspective on users’ needs to help designers improve the product.

ALA echoes the recommendation of the Census Scientific Advisory Committee in encouraging the Bureau to implement further usability improvements to the internet self-response instrument<sup>23</sup> and asks the Bureau to consult with the library community in doing so. Improving the usability of the internet self-response instrument will reduce respondent burden and reduce the government’s costs, which would advance the purposes of the PRA.<sup>24</sup>

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<sup>19</sup> 83 FR 26647.

<sup>20</sup> 83 FR 26645.

<sup>21</sup> U.S. Census Bureau, *supra* note 14.

<sup>22</sup> See, e.g., Information Policy and Access Center, “Public Libraries & E-Government,” 2014, *available at* <http://digitalinclusion.umd.edu/sites/default/files/EgovernmentIssueBrief2014.pdf>.

<sup>23</sup> Ron Jarmin, “U.S. Census Bureau Responses to Census Scientific Advisory Committee Spring 2017 Recommendations,” U.S. Census Bureau, August 15, 2017, at 2 (Advisory Committee commenting that “the online interface has a clunky, outdated look that is not very user-friendly. It clearly needs a great deal of further work.”).

<sup>24</sup> 44 U.S.C. § 3501(1) and § 3501(5), *supra* note 14.

## Conclusion

We appreciate the opportunity to comment on the Census Bureau's proposed information collection for the 2020 Census. ALA urges the Bureau to remove the citizenship question from the 2020 Census questionnaire, to collaborate with libraries on informing respondents and expanding technology access to the internet self-response option, and to maximize the usability of the internet self-response instrument. If you have any questions about these comments, please contact Gavin Baker ([gbaker@alawash.org](mailto:gbaker@alawash.org)) or Larra Clark ([lclark@ala.org](mailto:lclark@ala.org)).

Sincerely,

A handwritten signature in black ink that reads "Kathi Kromer". The signature is written in a cursive style with a large initial "K".

Kathi Kromer  
Associate Executive Director  
American Library Association