



ERIC GARCETTI
MAYOR

August 1, 2018

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

RE: Proposed Information Collection; Comment Request; 2020 Census. Federal Register Vol. 83, No.111/Friday, June 8, 2018, pp. 26643 - 26653.

Dear Ms. Jessup,

In response to Federal Register Notice, "Proposed Information Collection; Comment Request; 2020 Census in Vol. 83, No. 111, pp. 26643," I am writing to urge the Department of Commerce to remove the citizenship question from the 2020 Census form, as it will jeopardize the accuracy of the census, depress response rates and is costly--outcomes that the nation will have to live with for the next 10 years.

Additionally, I recommend that the Bureau significantly increase the percentage of Self-Response Households receiving the "Internet Choice" treatment and that those households be selected using criteria based on characteristics of hard-to-count populations or low internet coverage or connectivity.

Recommendation #1: Do not add a citizenship question to the decennial census.

Obtaining a full, fair, and accurate decennial census of everyone living in the United States is not only required by the Constitution, it is integral to our democracy. It determines how district lines are fairly drawn, and how at least \$800 billion in federal funds are distributed annually to state, local and tribal governments based on representative population size.

The data also guide important community decisions affecting schools, housing, health care services, business investment, and much more. Simply put, a fair and accurate census is essential for all basic functions of our society.

The Census Bureau should not add a citizenship question to the decennial census because its own studies have found that asking questions about citizenship caused an increase in confidentiality and data-sharing concerns among immigrants and their family members. It is therefore confirmed that such a question could drive down participation rates and impact the quality of the survey data.

Also, adding a citizenship question will significantly increase the US Census Bureau's costs. A decrease in initial response rates will require an investment in non-response follow up, which is one of the most expensive components of the census, largely because it is labor intensive. For a census that has been chronically underfunded from the outset, this could have a detrimental impact on the U.S. Census Bureau's ability to carry out the census and will significantly increase costs to the taxpayers.

As Mayor of the largest city within a hard-to-count state and county, this question is especially worrisome because an estimate 1.5 million of the City's residents are immigrants. Immigrant communities should not be made to feel distrustful of government, thus making them harder to reach to include in an accurate count.

This undercounting would result to significant loss of federal funding that will have a detrimental effect over the next decade –stripping funding from vital services and program in education, transportation, healthcare, and housing.

Recommendation #2: Significantly increase the percentage of Self-Response Households receiving the “Internet Choice” treatment and that those households are selected using criteria based on characteristics of hard-to-count populations or low internet coverage or connectivity.

To enhance the utility of the Bureau's information collection methods, I strongly urge you to significantly increase the percentage from twenty percent of self-response households receiving an initial mailing with an invitation to fill out the census online and a paper questionnaire (i.e., Internet Choice method).

In the City of Los Angeles, 2.2 million or 57 percent of the City's population is considered “hard” or “very hard”-to-count including racial and ethnic minorities, renters, immigrants, people with limited-English proficiency, families with very young children or who are living at or below the poverty level and seniors. And when it comes to determining how the households receiving the “Internet Choice” treatment are selected, I strongly urge you to consider not just low internet coverage or connectivity, but also characteristics of hard-to-count populations

like limited-English proficiency, foreign born, poverty level, age (65+ and over), etc.

A full, fair, and accurate census is absolutely critical to ensure the vitality of our democracy. For the reasons discussed above, I strongly oppose asking about citizenship status in the 2020 Census and urge the Department of Commerce to remove the proposed citizenship question from the data collection forms. I also recommend that the Census Bureau significantly increase the percentage of Self-Response Households receiving the "Internet Choice" treatment and that those households are selected using criteria based on characteristics of hard-to-count populations or low internet coverage or connectivity.

Sincerely,

A handwritten signature in black ink, appearing to read "E. Garcetti". The signature is fluid and cursive, with a small mark at the end.

ERIC GARCETTI
Mayor, City of Los Angeles



ERIC GARCETTI
MAYOR

July 20, 2018

The Honorable Marc Berman
Assemblymember, District 24
State Capitol, Room 6011
Sacramento, CA 94249-0024

RE: SUPPORT for AB 2592: Secretary of State: Census Outreach and Education

Dear Assemblymember Berman:

I write to express my support for AB 2592, which will promote awareness of and broaden participation in the 2020 Census. In order to achieve these objectives, the bill proposes that the Secretary of State prioritize historically “hard-to-count” communities based on response rate data from the United States Census Bureau.

Fifty-seven percent of residents in the City of Los Angeles are considered “hard to count”, which makes it difficult to gather an accurate census count in Los Angeles County. The challenge of ensuring an accurate count is compounded by the growing anxiety and mistrust among immigrant communities. A potential citizenship question on the census will exacerbate these challenges, lower participation, and contribute to an inaccurate count. This could lead to the City of Los Angeles potentially losing billions of dollars in federal funding, as well as impact our political representation in Sacramento and Washington, DC.

For these reasons, I applaud your efforts to ensure a full, fair, and accurate count in the federal decennial Census and support the swift passage of AB 2592. This letter reflects the support solely of its author.

Sincerely,

A handwritten signature in black ink, appearing to read 'E. Garcetti' with a stylized flourish at the end.

ERIC GARCETTI
Mayor



ERIC GARCETTI
MAYOR

June 20, 2018

Dr. Nancy Potok
Chief Statistician
Office of Management and Budget
725 17th Street, NW
Washington D.C. 20503

RE: Procedures for Participating in the Appeals Process for the 2020 Census Local Update of Census Addresses Operation (LUCA) - Comment Request. Federal Register Vol. 83, No.98 / Monday, May 21, 2018, pp. 23487-23491

Dear Dr. Potok,

As Mayor of the City of Los Angeles, I write in response to the May 21, 2018 *Federal Register Notice* requesting comments on the procedures for participating in the appeals process for the 2020 Census Local Update of Census Addresses (LUCA) operation.

As a participating local government agency in the U.S. Census Bureau's LUCA program, we recognize the critical importance of the decennial census and the LUCA program. The decennial census determines how billions of federal funds and political representation are distributed equitably among all fifty states. For a city like Los Angeles, which is located within the hardest-to-count state and county in the nation, it is vitally important that we do everything we can to ensure a full, fair, and accurate count in 2020.

In the Federal Register Notice, you discuss the proposed appeals procedures for LUCA participants, stating that "eligible LUCA Operation participants must provide(1) contact information for the governmental jurisdiction filing the Appeal, (2) address information for each address being appealed, and (3) supporting documentation that substantiates the existence and/or location of *each* address being appealed..."

The proposed LUCA appeals procedures also require that LUCA participants file all appeal documentation within 45 calendar days of receiving its LUCA feedback materials after the City submits its Master Address File for 2020 by the July 19, 2018 deadline.

Once the City receives the feedback materials, we undoubtedly will have addresses to appeal, specifically: (1) address additions and corrections they provided after their initial review of the 2020 Census Address List that the Census Bureau did not accept, and / or (2) addresses that were deleted from the 2020 Census Address List by the Census Bureau during subsequent operations that were not commented on by participants during their initial LUCA review.

Letter to Dr. Nancy Potok, Office of Management and Budget

RE: Procedures for Participating in the Appeals Process for the 2020 Census Local Update of Census Addresses Operation (LUCA)

Page 2

Comment 1 - The requirement that LUCA participants submit supporting documentation for each address being appealed is next to impossible for a city as large as Los Angeles:

It is unrealistic to expect participating governments as large as Los Angeles to produce and submit individual documentation for each individual address, with a turn-around appeals window of just 45 days. Similarly, small jurisdictions that lack the resources or capacity to dedicate to this process will likely miss this critical opportunity. In 2010, the City of Los Angeles participated in the LUCA program and appealed approximately 400,000 addresses that were either rejected or deleted by the U.S. Census Bureau.

During that process, the U.S. Census Bureau used the “preponderance of evidence” approach - meaning that LUCA participants (a) submitted a detailed written explanation of the methods and materials they used to conduct their review of the rejected or deleted addresses and (b) demonstrated the quality and accuracy of the supporting materials and the rigor of the methods used in the analysis by submitting examples of valid addresses with supporting documentation. However, under the proposed requirements the City would have to submit supporting documentation for each appealed address within a 45-day window.

Comment 2 - The “preponderance of evidence” methodology should be used for appeals:

Rather than require LUCA participants to submit supporting documentation for each address being appealed, the Census Bureau should use the “preponderance of evidence” approach from the 2010 Census. This is a far more efficient and timely approach that will result in a more accurate Master Address File. Importantly, this will enhance the timeliness of the appeals process. We strongly recommend that the requirement for supporting documentation for each individual appealed address be removed, and replaced with a standard that emphasizes “a preponderance of evidence” as described above. The proposed requirements to submit supporting documentation would cause an undue administrative burden for a jurisdiction like Los Angeles.

Thank you for your careful consideration of these concerns, in your review of the LUCA appeals process. The City of Los Angeles values its partnership with the Office of Management and Budget to support an accurate census count in 2020. Should you have any questions, please contact Maria de la Luz Garcia, Director of the Census 2020 Initiative, at (213) 922-9768, or by e-mail at Maria.Garcia@lacity.org.

Sincerely,

A handwritten signature in black ink, appearing to read 'E. Garcetti', with a horizontal line extending to the right.

ERIC GARCETTI
Mayor of Los Angeles



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MAYOR

March 28, 2019

The Honorable Maria Elena Durazo (SD-24)
Chair, Senate Budget Subcommittee No. 4
California State Senate
State Capitol, Room 5019
Sacramento, CA 95814

**RE: Census 2020 Outreach and Education:
Request for Additional Funding for Los Angeles County**

Dear Honorable Chair Durazo:

I urge you and your committee colleagues to allocate at least \$5 million dollars in funding in the 2019-20 budget for Census 2020 outreach and education in the County of Los Angeles, the hardest-to-count (HTC) county in the nation.

I applaud the State of California's demonstrable financial investment of \$90.3 million dollars to date to ensure a full, fair and accurate count of all Californians in the next decennial census. That funding includes \$9.4 million dollars of the County of Los Angeles' original \$12 million dollar request to participate in the State's Complete Count Program. Governor Gavin Newsom's 2019-20 Proposed Budget adds an additional \$54 million dollars for a total statewide investment of \$144.3 million dollars.

I respectfully request you allocate \$2.6 million to fill the funding gap remaining from L.A. County's FY 2018-2019 request, and add an additional \$2.4 million to meet new State requirements for a total funding allocation of \$5 million. The increase in funding will not only fill the funding gap, which will help the City of Los Angeles reach its HTC populations and also help local governments to meet new state requirements, which include assisting with the recruitment of U.S. Census Bureau enumerators.

Making a significant investment in the City of L.A. is wise and fiscally prudent. The State of California's HTC Index estimates the City makes up more than half of HTC block groups in the County of LA, 50.9 percent. Should even one percent of the City's population go uncounted, the State of California stands to lose up to \$78 million annually in federal funding for the next ten years, placing additional pressure on the state to fill the funding gap for critical social service programs in health, transportation, education, and housing.

Letter Re: Census 2020 Outreach and Education: Request for Additional Funding for Los Angeles County

March 28, 2019

Page 2

I am committed to making Census 2020 a funding and legislative priority. To date, the City of L.A. has allocated a total of \$1.2 million of its own funds toward Census 2020 and in February 2018, I issued Executive Order 21: Decennial Census Preparations which directs city departments to designate a census liaison and work with my administration to develop Census 2020 Outreach action plans. Additionally, since October 2017, my census team has been working in partnership with the County of Los Angeles and the California Complete Count office to plan and prepare for Census 2020 by co-leading the Countywide Outreach Complete Count Committee. As the first local complete count committee to be convened in the State of California, the City and County of Los Angeles serve as leaders and a shining example of how successful and effective cross-government collaborations can be.

I look forward to our continued partnership to ensure all of our residents are counted in 2020. In the meantime, should you have any questions or would like further information, please feel free to contact Maria de la Luz Garcia, my Census Director, at: (213) 922-9768 or maria.garcia@lacity.org. This letter reflects the opinion solely of its author.

Sincerely,



ERIC GARCETTI
Mayor of Los Angeles

CC: Senator Jim Nielson, Senate District 4
Senator Thomas J. Umberg, Senate District 34
Sachi A. Hamai, Chief Executive Officer, County of Los Angeles



ERIC GARCETTI
MAYOR

March 28, 2019

The Honorable Jim Cooper (AD-09)
Chair, Assembly Budget Subcommittee No. 4
California State Assembly
Capitol Office, Room 6025
P.O. Box 942849
Sacramento, CA 94249-0009

**RE: Census 2020 Outreach and Education:
Request for Additional Funding for Los Angeles County**

Dear Honorable Chair Cooper:

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Mayor of Los Angeles

CC: Assemblymember David Chiu, Assembly District 17
Assemblymember Tom Lackey, Assembly District 36
Assemblymember Adrin Nazarian, Assembly District 46
Assemblymember Buffy Wicks, Assembly District 15
Assemblymember Phil Ting, Assembly District 19
Assemblymember Jay Obernolte, Assembly District 33
Sachi A. Hamai, Chief Executive Officer, County of Los Angeles