



August 7, 2018

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

RE: Comments on Proposed Information Collection on 2020 Census, Docket No. USBC-2018-0005

Dear Ms. Jessup,

The National Association for the Education of Young Children (NAEYC), along with the 26 undersigned Affiliates and aligned organizations, is grateful for the opportunity to elevate the voices of early childhood professionals in submitting these comments elevating our concern around the net undercount of young children and the recent addition of a citizenship question to the 2020 decennial census form.

Founded in 1926, NAEYC is driven by a mission to promote high-quality early learning for all young children, birth through age 8, by connecting practice, policy, and research. We represent nearly 60,000 individual members and 52 affiliates, all working with children, families, and educators to achieve a collective vision where all young children thrive and learn in a society dedicated to ensuring they reach their full potential.

With our rich history of advocating for federal programs and policies that positively impact and advance the life outcomes of young children and their families, NAEYC has a deep appreciation for the importance of the 2020 Census, and for the ways in which the resulting data will be used to inform public policy and funding decisions that impact millions of lives.

As such, we are very concerned about the high net undercount of young children in the Census, as well as the ways in which the addition of a citizenship question could worsen the undercount, and have a disproportionate impact on young children in communities of color.

While we therefore commend the Census Bureau for improving the language on primary solicitation materials to explicitly name children and babies, we simultaneously:

- urge the Bureau to remove the citizenship status question and
- request that the Bureau revamp its communication research and outreach to include special attention to the undercount of young children.

Recent research from the Census Bureau indicates that more than 10 percent of young children—or one of our every ten children ages zero to four—were omitted from the 2010 Census, with the deepest impact on children of color.



National Association for the Education of Young Children

The undercounting of young children has many consequences, but one of the key implications is that communities with a relatively high net undercount of young children do not benefit from their fair share of federal funding. Census data are used for distributing more than \$800 billion in federal funding to states and localities each year, and many of these programs, such as Medicaid, State Children's Health Insurance Program (S-CHIP), Supplemental Nutrition Assistance Program (SNAP), Head Start and Early Head Start, and the Child Care Development Block Grant, serve young children and their families.

We join many partners in elevating our deep concerns that the undercounting of young children may happen again during the 2020 decennial census, with serious and long-lasting consequences related to funding, planning, representation, and data distortion. If this happens, many young children, as well as their families, and educators who are supported to thrive through federal and state investments, could face significant negative impacts. We are also particularly concerned that the high net undercount, and its impact on federal funding, effectively penalizes children of color who face higher poverty rates than Non-Hispanic White children, making it increasingly difficult to reduce and eliminate disparities in opportunities and outcomes.

Our concerns are heightened by the recent addition of an untested citizenship question to the 2020 decennial census form. The Census Bureau's work to update the language on the primary solicitation materials to increase the count of children is severely undercut by the addition of this question, which will increase the fears of millions of immigrant families, and decrease their willingness to complete the form. NAEYC urges the Census Bureau to rethink the addition of the citizenship question in light of the harmful consequences it may have on a population already at a high-risk of being undercounted: our nation's young children.

We also request that the Census Bureau pay attention to the historical undercount of young children and revamp its communications research and outreach to include special attention to the undercount of young children and ensure there is a statistically accurate count of this population in 2020. Specifically, we urge the Bureau to investigate what types of messengers and messages families with young children are most likely to trust, with a focus on the role of faith leaders, child care and preschool staff, social service agency staff, and medical staff.

A full, fair, and accurate census must include a count of everyone living in this country, including its youngest members. We encourage you to reach out to us with any questions by contacting our senior director of public policy, Lauren Hogan, at lhogan@naeyc.org or at (202) 232-8777 ext. 6087, and we thank you for the opportunity to provide public comment and for your important work in carrying out the 2020 decennial census.

National Association for the Education of Young Children

Arizona Association for the Education of Young Children
California Association for the Education of Young Children
Colorado Association for the Education of Young Children
Connecticut Association for the Education of Young Children



National Association for the Education of Young Children

- Florida Association for the Education of Young Children
- Golden Corridor Association for the Education of Young Children
- Hawaii Association for the Education of Young Children
- Illinois Association for the Education of Young Children
- Iowa Association for the Education of Young Children
- Kansas Association for the Education of Young Children
- Massachusetts Association for the Education of Young Children
- Maine Association for the Education of Young Children
- Maryland Association for the Education of Young Children
- Michigan Association for the Education of Young Children
- Minnesota Association for the Education of Young Children & MN School-Age Care Alliance
- North Carolina Association for the Education of Young Children
- Northern Virginia Association for the Education of Young Children
- Ohio Association for the Education of Young Children
- Oklahoma Association for the Education of Young Children
- Peace Educators Allied for Children Everywhere (P.E.A.C.E.)
- Pennsylvania Association for the Education of Young Children
- Texas Association for the Education of Young Children
- Trying Together, a partner with PennAEYC to support the Pittsburgh Chapter of PennAEYC
- Virginia Association for the Education of Young Children
- Washington Association for the Education of Young Children
- Wisconsin Early Childhood Association