



July 19, 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

On behalf of the Kalamazoo Community Foundation, I am writing in response 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.** Community foundations (CFs) have a unique perspective on why an accurate Census is vital to all communities, urban and rural, regardless of the size of their immigrant populations.

As you may know, CFs are tax-exempt public charities serving people who share a common interest in improving the quality of life in their geographic area. There are over 800 CFs in the United States, active in every Congressional district, and they vary significantly in the size of their endowment, from less than \$1 million to about 20 nationwide that manage over \$1 billion in assets. CFs are found in most major cities, and in many counties and smaller towns. Some are also statewide.

A central advantage that CFs offer is that they know the community and stay alert to emerging issues, needs, and opportunities. They steward the community's endowment, ensuring that during difficult economic times, funds are available to meet local needs. The expertise they bring to the table allows donors to learn about local nonprofits making a difference in their community.

As an example, in early 2018 our community experienced a flood emergency affecting the ability of more than 500 families to provide a safe, dry home for their family. We were able to leverage our local relationships with community partners, our network of donors, and our own grantmaking dollars to quickly and nimbly respond. More than \$370,000 was raised from individuals, foundations and corporations to support the individuals and families displaced or significantly affected by the flooding. These funds provided temporary shelter, home repairs, replacement furniture and appliances, and food and clothing as needed. In this example as in countless more, we here at the Kalamazoo

Community Foundation tirelessly work to remove barriers that prevent individuals and families from reaching their full potential.

As public charities, community foundations are often engaging with Congress on issues affecting charities and public foundations, such as charitable deductions, donor-advised funds, estate taxes, and gifts of appreciated property. **The 2020 Census is also vitally important to every community, large and small, urban and rural, Democratic or Republican, so community foundation leaders from around the country are speaking up on this issue as well.**

Since 1790, the Census Bureau has conducted a count of the country's population every 10 years, as required by the Constitution. In conjunction with this count, the American Community Survey (ACS) gathers more detailed information on the changing economic and social conditions of the population. These programs are crucial for informing policymakers, apportioning Congressional seats, drawing district lines, and distributing nearly \$700 billion in federal funding each year for health care, education, development, transportation, housing, civil rights enforcement, and much more.

As the philanthropic hub in our communities, CFs bring together the financial resources of individuals, families, and businesses to support charitable organizations dedicated to improving the lives of those most in need. We know a fair and accurate Census is a crucial prerequisite for serving the needs of marginalized communities. Past Censuses have tended to undercount communities of color, people in poverty, young children, and rural residents. The systematic undercounting of these communities decreases their access to federal funding and accurate Congressional representation.

In our philanthropic work at the Kalamazoo Community Foundation, we depend on reliable, accurate census data to make decisions about our grant making and organizational priorities. Additionally, federal funding for essential programs relating to health care and education are guided by census data. Undercounting the most marginalized residents of our community will undermine our central mission to ensure all residents are able to reach their own full potential.

Many of the programs that help to mend the gaps in our society and allow all to live in dignity depend on data from the Census. An accurate Census is vital for funding of:

- Rural business and industry development loans
- Job training and other employment programs
- Health care for infants and children
- Child care for low-income and working families
- Water and waste disposal systems
- Policing agencies and community-based entities working to reduce crime
- Monitoring and enforcing discrimination laws under the Civil Rights Act
- Local agencies for food, health care, and legal services for senior citizens and individuals with disabilities

**Because an accurate Census is so vital to our community, we oppose the proposed addition of a question on citizenship, because it will reduce response rates and affect**

**public programs in communities large and small.** The issue of citizenship and the Census is entirely separate from current controversies over illegal immigration and how immigration laws should be changed. We are concerned adding the citizenship question would seriously threaten Census accuracy and substantially increase costs while decreasing participation, which will harm the vulnerable populations we are here to serve.

Thank you for your attention to our comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'CPE', written in a cursive style.

Carrie Pickett-Erway  
President/CEO  
Kalamazoo Community Foundation