

August 7, 2018

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

RE: Docket Number USBC -2018-0005, 83 FR 26643, Doc. 2018-12365

Dear Ms. Jessup:

On behalf of TESOL International Association (TESOL), a professional association for English language educators, I am writing to express the association's serious concerns regarding the proposed addition of a citizenship question to the 2020 United States Census and its potential impact on English learners and teachers. TESOL fully supports the Department of Commerce's mission to provide a fair and accurate count of all peoples living within the United States and thereby to ensure accurate representation in Congress and in federal funding. We believe, however, that adding a question to the 2020 U.S. Census that asks for current citizenship status will have a chilling effect on census participation, leading to undercounts in already undeserved communities across the country, and negatively impact the accuracy of federal education funding formulas.

The U.S. Census has a tremendous impact on public finances for K-12 and adult education, both of which rely on accurate census data to ensure that funding is adequate. Both K-12 and adult education programs serve a vital role in providing language instruction for English learners, and in the case of adult education, help immigrants successfully integrate into U.S. society. Furthermore, current laws make it clear that federal funding for K-12 and adult education is available for all residents, regardless of citizenship status. With the addition of a citizenship question, communities that are already both difficult-to-reach and fearful of providing the government with personal information, may refuse to take part in the census, leading to an inaccurate population count.

TESOL strongly urges the Department of Commerce to reject the addition of a citizenship question on the next census, and avoid any potential harm to the nation's public schools and some of its most vulnerable learners.

Thank you for the opportunity to offer our comments on the changes to the 2020 U.S. Census that are being proposed.

Sincerely,



Christopher Powers
Executive Director