June 13, 2018

The Honorable Wilbur Ross Secretary
U.S. Department of Commerce, Room 5421
Fourteenth Street and Constitution Avenue, NW
Washington, D.C. 20230

Dear Secretary Ross,

This letter is in response to the announcement that the Census Bureau will include a question about citizenship in the 2020 Census. We are the Culture Marketing Council: The Voice of Hispanic Marketing, the only national business trade organization representing the entire Hispanic marketing, communications and media industry. Our association represents more than 45,000 professionals from the most respected media, marketing and brand advertisers in the U.S. that focus on reaching and connecting with America’s Hispanic consumers.

We are writing to express our opposition to the decision to add a citizenship question to the 2020 Census as announced by the U.S. Department of Commerce on March 26. Demographers and other experts—including several former directors of the census—have warned that adding a citizenship question could result in reduced response rates and inaccurate answers. An undercount has serious repercussions not just for federal funding but also for U.S. business and commerce. In fact, Pew Research reports adding the citizenship question to the 2020 Census could raise concerns among respondents about the confidentiality of personal information thus reducing participation and representation, particularly among communities of color and millennials.

- A September 2017 memorandum from researchers at the Census Bureau said they noticed a “recent increase in respondents spontaneously expressing concerns about confidentiality” during 2017 pretesting studies, as a result of topics like the ‘Muslim ban,’ discomfort ‘registering’ other household members by reporting their demographic characteristics, the dissolution of the ‘DACA’ (Deferred Action for Childhood Arrival) program, repeated references to Immigration and Customs Enforcement (ICE), etc. This goes to the heart of a decreased response rate among multicultural communities.

- Geographies could be adversely affected. According to CNN, states with large immigrant populations like Texas, California, Florida, New Jersey, New York and Illinois could experience an undercount, as well as immigrant populations that have surged in the
Southeast, from small towns in rural communities to bigger cities like Charlotte, North Carolina, and Atlanta.

- An undercount could also affect the critical younger 18-34 millennial demographic. According to Nielsen, nearly half (42%) of U.S. millennials are people of African-American, Asian-American and Hispanic heritage. Immigrants and specifically millennial Latinos are key to the overall youth of our median age. Without them, the U.S. is a badly aging nation.

In short, an undercount among communities of color and millennials ages 18-34 is bad for business, as this is the core target for many Fortune 100 companies. Our membership and their respective businesses rely heavily on census data to determine accurate populations, by which we, and the largest marketers and research organizations in the U.S., use to make and measure investment decisions for multicultural communities ranging from advertising and branding to product development, staffing and more. The addition of the citizenship question and the subsequent undercount it will generate disproportionately impacts communities of color and millennials. This in turn disproportionately and negatively impacts multicultural marketers in the U.S., as well as any branded efforts in minority/majority markets, including New York, California, Texas and Florida.

In closing, we urge you to oppose the addition of the citizenship question to the 2020 Census, given the negative impact on communities of color and U.S. businesses. We strongly believe this question will only serve to suppress participation but also will result in data that does not accurately reflect the makeup of the U.S. population.

Sincerely,

Horacio Gavilan
Executive Director