



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,

On behalf of the Hindu American Foundation (HAF), we write to offer comments on the 2020 Census proposed information collection. We strongly urge the Department of Commerce to remove the citizenship question from the 2020 Census form as it will jeopardize the accuracy of the census in all communities.

HAF is a non-partisan non-profit advocacy organization for the Hindu American community. The Foundation educates the public about Hinduism, speaks out about issues affecting Hindus worldwide, and builds bridges with institutions and individuals whose work aligns with HAF's objectives. HAF focuses on the areas of education, policy, and community building, and works on a range of issues from an accurate understanding of Hinduism, civil and human rights, and addressing contemporary problems by applying Hindu philosophy.

The Hindu American Foundation is not affiliated with any religious or political organizations or entities. HAF seeks to serve Hindu Americans across all sampradayas (Hindu religious traditions) regardless of race, color, national origin, citizenship, caste, gender, sexual orientation, age, and/or disability.

Hindu Americans: Demographics and Immigration History

Hindu Americans, estimated at 3.2 million, represent diverse ethnic backgrounds, including but not limited to individuals of Indian, Pakistani, Bangladeshi, Malaysian, Indonesian, Afghani, Nepalese, Bhutanese, Sri Lankan, Fijian, Caribbean, and European descent. The majority of Hindus, however, are of Indian ethnic origin and are largely an immigrant community. It was only after the lifting of the Asian Exclusion Act of 1924 in 1943 and the abolishment of quotas for immigrants based on national origin in 1965 that Hindus came to the United States in increasing numbers.

Most Hindus have come to the U.S. as students, high skilled workers, or family members in search of better economic opportunities and unification. And there are others who have arrived in this country after facing religious persecution in their country of origin, such as Afghanistan, Bangladesh, Pakistan, Sri Lanka, and Bhutan. In the last few years, for example, more than 90,000 mostly Hindu Bhutanese

have been resettled across the country after being forcibly evicted from Bhutan in the 1990s and living in refugee camps in Nepal for nearly 20 years. There are also those who are undocumented.

As an advocacy organization working with these diverse ethnic and immigrant communities in the U.S., we believe a full, fair, and accurate census, and the collection of useful, objective data about our nation's people, housing, economy, and communities, is vitally important.

Census: Constitutionally Required and Essential to a Healthy Democracy

Not only is a nationwide census required by the Constitution, it is integral to our democracy, ensuring that district lines and political power are fairly drawn and allocated. The federal government uses census-derived data to direct at least \$800 billion annually in federal assistance to states, localities, and families.

Furthermore, such data would guide policy-makers at the federal, state, and local levels to effectively implement policies and distribute resources that help reduce ethnic and racial disparities in access to housing, education, and employment opportunities, and utilize preventative measures across various sectors, such as healthcare, that can lead to a reduction in costs over the long-term.

In essence, a fair and accurate census is essential for all basic functions of our society.

That is why the 2020 Census should not include a question on citizenship that the weight of scientific evidence indicates will undermine a successful count of our nation's people. Instead, citizenship information can be obtained from current administrative records, which will be more accurate and avoid impacting the accuracy of the Census.

Citizenship Question Adversely and Disparately Impacts Hindu Americans

The addition of a citizenship question will particularly impact the large Asian American population, which has immense cultural, linguistic, and religious diversity, as well as varied socio-economic conditions. As noted above, a significant portion of the 3.2 million Hindu Americans are from Asian countries.

Asian Americans are the fastest growing ethnic or racial group in the U.S. and will constitute the largest immigrant group in the country by 2055.¹ Given these rapidly growing numbers, detailed data collection on the Asian American population is particularly important in the 2020 Census, to ensure that they receive adequate political representation and have access to resources and services.

Additionally, many of the Asian subgroups have been vulnerable to increasing discrimination and hate crimes² to varying degrees, and thus having accurate and comprehensive data on them would be

¹ Lopez, Gustavo, Ruiz, Neil G., and Patten, Eileen, "Key facts about Asian Americans, a diverse and growing population," September 8, 2017, Pew Research Center, <http://www.pewresearch.org/fact-tank/2017/09/08/key-facts-about-asian-americans/>.

² Chen, Jenny J., "First-ever tracker of hate crimes against Asian-Americans launched," February 17, 2017, NPR, <http://www.npr.org/sections/codeswitch/2017/02/17/515824196/first-ever-tracker-of-hate-crimes-against-asian-americans-launched>; "Kuchibhotla murder, racial slurs: 'Hate crimes' against Indians in US," March 15, 2017, Hindustan Times,

helpful for relevant government agencies and organizations representing these communities in order to better track and address trends.

In spite of their large and growing numbers, detailed data on the diverse Asian American community, including Hindu Americans, is already difficult to obtain due to a number of factors. For instance, prior census data demonstrates that communities with limited English proficiency have been historically undercounted.³ Many Asian subgroups such as Bhutanese Americans (who are predominantly Hindu) have significant English language barriers. Similarly, high poverty rates are closely linked with low rates of enumeration in past data collection surveys.⁴ And three specific Asian-American subgroups with large numbers of practicing Hindus — Bhutanese, Bangladeshi, and Nepalese — experience high poverty rates. The Bhutanese, further, have low education levels, another indicator of hard-to-count populations, with only nine percent of Bhutanese adults having a college degree.⁵

Consequently, the inclusion of a citizenship question in the 2020 Census will only likely further exacerbate the difficulty in accurately counting Asian Americans more broadly and Hindu Americans specifically. This will result in an undercount by discouraging many Hindu Americans and other Asians from participating.

Furthermore, Hindu Americans and their family members from India and other countries that are temporary workers, students, or undocumented may be fearful of answering the citizenship question, given the uncertain future of many immigration policies and their tentative immigration status, and thus would be less likely to participate.

Beyond the impact on Asian Americans, a citizenship question on the 2020 Census will have significant implications for many other immigrant communities that our organization works with. For instance, the broader Caribbean population in the U.S., including ethnic Indian Hindu immigrants from Trinidad and Tobago, and Guyana, has historically been undercounted due to a variety of factors. Caribbean community leaders are concerned that the citizenship question will lead many in the community to avoid participating in the 2020 census, leading to a severe undercount and marginalization.⁶

As a result, an undercount would potentially marginalize many in the Hindu American community and deprive them of access to federal funds, essential services, and equal political representation.

<http://www.hindustantimes.com/india-news/sikh-man-shot-third-attack-in-two-weeks-hate-crimes-against-indians-in-us/story-3HWqflKF1gsSawg5xVqWPN.html>

³ “DSSD Census Coverage Measurement Memorandum Series #2010-G-01: 2010 Census Coverage Measurement Estimation Report: Summary of Estimates of Coverage for Persons in the United States.” U.S. Census Bureau, 2012.

⁴ Fernandez, Shatuck and Noon. Presentation at the Southern Demographic Association Conference, October 2016.

⁵ Lopez, Gustavo, Ruiz, Neil G., and Patten, Eileen, “Key facts About Asian Americans, a diverse and growing population,” September 8, 2017, Pew Research Center,

<http://www.pewresearch.org/fact-tank/2017/09/08/key-facts-about-asian-americans/>.

⁶ “Mccallister, Jared, “CARIBBEAT: Census citizenship query is a big shock – for Caribbean-American communities and elected officials,” April 1, 2018, NY Daily News,

<http://www.nydailynews.com/new-york/caribbeat-census-query-big-shock-article-1.3907958#>



Diverse and Broad-based Opposition to Citizenship Question

The decision to include a citizenship question on the 2020 Census has drawn intense opposition from a nonpartisan and ideologically diverse group of business leaders, state and local officials, social scientists, and civil and human rights advocates. Specifically, more than 160 Republican and Democratic mayors, six former directors of the Census Bureau and two former Commerce Secretaries from Republican and Democratic administrations, civil and human rights groups, more than 600 faith leaders, more than 120 of members of the U.S. House of Representatives, and many others representing a range of political ideologies and communities. **They have all expressed deep concern that an untested citizenship question will compromise implementation of the 2020 Census and jeopardize the quality and accuracy of census data for all communities.**

The harm from this decision (if it is not reversed) would be universal, with communities that are already at greater risk of being undercounted suffering the most, including members of the Hindu American community.

Citizenship Question Costly to Taxpayers and Quality of Census

Additionally, an untested citizenship question will drive up costs as the Census Bureau struggles to develop new communications and outreach strategies with little time remaining, plan for an expanded field operation, and track down the millions of households that will be more reluctant to participate because of this controversial question. In sum, asking about citizenship status in a climate of fear and mistrust can only heighten suspicions, depress response rates, cost additional taxpayer money, and prevent an accurate, inclusive 2020 enumeration.

A full, fair, and accurate census is absolutely critical for our community. For the reasons enumerated above, we 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.

Sincerely,

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