



August 7, 2018

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

Re: Docket number USBC–2018–0005: Proposed Information Collection; Comment Request; 2020 Census

Dear Ms. Jessup:

New York University's Furman Center for Real Estate and Urban Policy appreciates the opportunity to submit comments on the addition of a citizenship question to the 2020 U.S. Census.¹ The NYU Furman Center advances research and debate on housing, neighborhoods, and urban policy by providing academic and empirical research, promoting evidence-based discussions among stakeholders, and providing essential data and analysis to practitioners and policy makers.²

The U.S. Census is a vitally important source of data for researchers and policy makers across the country, and specifically for the Furman Center's research and analysis on housing and urban policy issues. Information from the decennial census is critical to our work, and informs numerous data sets and surveys that we use, including the American Community Survey and the American Housing Survey. Please see Appendix A for a summary of a sample of our recent work that relies on Census data.

We depend on accurate and complete Census data to ensure the integrity of our research and to produce findings that policy makers can rely on to make evidence-based decisions about important housing and land use policy issues at the local, state, and federal level. Using data from the Census, we have conducted policy research and analysis on a variety of pressing issues including rental housing trends in America's largest metro areas³, the state of housing and neighborhoods in New York City⁴, and how Small Area Fair Market Rents affect the availability of homes affordable to housing voucher holders.⁵ We have also examined the impact of segregation on the economic and educational outcomes of young Black and Latino adults⁶ and how reductions in crime shape residential choices for households of different demographics.⁷ Census data provided the foundation for all of this research, which decision

¹ 83 Fed. Reg. 26643 (June 8, 2018).

² These comments do not represent the institutional views (if any) of NYU, NYU School of Law, or the NYU Wagner Graduate School of Public Service.

³ NYU Furman Center, 2017 National Rental Housing Landscape, <http://furmancenter.org/nrhl>

⁴ NYU Furman Center, State of New York City's Housing and Neighborhoods in 2017. (2018) <http://furmancenter.org/research/sonychan>

⁵ NYU Furman Center, How Do Small Area Fair Market Rents Affect the Location and Number of Units Affordable to Voucher Holders? (January 2018) https://furmancenter.org/files/NYUFurmanCenter_SAFMRbrief_5JAN2018_1.pdf

⁶ NYU Furman Center, Black and Latino Segregation and Socioeconomic Outcomes, September 2015. http://furmancenter.org/files/NYUFurmanCenter_BlackLatinoSegregation_16SEPT15.pdf

⁷ NYU Furman Center, Has Falling Crime Invited Gentrification? October 2016.

http://furmancenter.org/files/NYUFurmanCenter_WhitePaper_FallingCrimeGentrification_18OCT2016.pdf

makers and other stakeholders have depended on to better understand and improve communities.

We are concerned about the potential impact of a citizenship question on the accuracy of the 2020 U.S. Census and urge the Department of Commerce to delay adding the question until it satisfactorily addresses two issues of particular concern.

Inadequate Testing and Evaluation of the Citizenship Question

The Census Bureau typically conducts rigorous testing and evaluation of census questions before making changes to the survey. The citizenship question has not been rigorously tested for the 2020 Census, and it has not been used on a U.S. Census since 1950.⁸ Adequate testing of survey questions is critical to identify potential problems that can emerge based on question design, order, and/or wording choices. Implementing the citizenship question without sufficient testing can compromise the quality of all responses. It can also undermine the standard Census testing and evaluation process and reduce confidence in the data collected.

Potential Impact of the Citizenship Question on Census Data Accuracy and Utility for Longitudinal Research

The value of the U.S. Census data – for policy analysis and research, depends critically on its accuracy in counting residents and documenting their demographics. There is growing concern among civil rights and community leaders⁹ that adding the citizenship question may lower participation among specific communities, leading to an inaccurate population count. Additionally, Census Bureau researchers have reported a “recent increase in respondents spontaneously expressing concerns to researchers and field staff about confidentiality and data access relating to immigration”¹⁰ and expressed “concerns within CSM regarding potential barriers to respondent participation in the 2020 Census, as well as other Census Bureau surveys.”¹¹

An inaccurate 2020 Census has significant implications for longitudinal research studies that capture population changes over many years. Inaccurate data may prevent researchers from accurately identifying important trends, developing insights about populations over time, and studying the effect of public investments and public policy decisions. An accurate U.S. Census is also critical for research integrity as Census data is the basis for numerous important surveys, and any inaccuracies in the Census will have an impact on many other data sets.

The two concerns we raise were also raised by the Census’ Scientific Advisory Committee, whose mission includes providing “formal review and feedback on working papers, reports, and other documents related to design and implementation of census programs and surveys.”¹² Specifically, on March 30th, 2018, the Committee issued a statement opposing the last-minute inclusion of the citizenship question, citing the lack of adequate testing and the potential

⁸ Pew Research Center Fact Tank, What to know about the citizenship question the Census Bureau is planning to ask in 2020, March 30, 2018. <http://www.pewresearch.org/fact-tank/2018/03/30/what-to-know-about-the-citizenship-question-the-census-bureau-is-planning-to-ask-in-2020/>

⁹ The Leadership Conference on Civil and Human Rights, 131 Groups Fight to Remove 2020 Census Citizenship Question, July 25, 2018. <https://civilrights.org/131-groups-fight-remove-2020-census-citizenship-question/>

¹⁰ “Respondent Confidentiality Concerns and Possible Effects on Response Rates and Data Quality for the 2020 Census.” Presentation at National Advisory Committee on Racial, Ethnic, and Other Populations. November 2, 2017. <https://www2.census.gov/cac/nac/meetings/2017-11/Meyers-NAC-Confidentiality-Presentation.pdf>

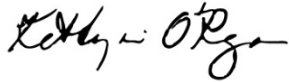
¹¹ Memorandum for Associate Directorate for Research and Methodology. September 20, 2017. <https://www2.census.gov/cac/nac/meetings/2017-11/Memo-Regarding-Respondent-Confidentiality-Concerns.pdf>

¹² Census Advisory Committee. United States Census Bureau. <https://www.census.gov/about/cac/about.html>

implications inclusion of that question has for nonresponses. The Census should not break with its well established process of testing the addition of questions, so as to understand the implications such changes have on the accuracy of the Census count.

Thank you for your consideration of these comments and your commitment to ensuring an effective U.S. Census. Please contact Camille Watson at camille.watson@nyu.edu if we can provide any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Katherine O'Regan". The signature is fluid and cursive, with the first name "Katherine" and the last name "O'Regan" clearly distinguishable.

Katherine O'Regan, PhD
Faculty Director, NYU Furman Center

Appendix A

Sample Summary of NYU Furman Center Publications that use U.S. Census Data

August 2018

Articles

Gateway to Opportunity? Disparities in Neighborhood Conditions Among Low-Income Housing Tax Credit Residents

June 7, 2017

Ingrid Gould Ellen, Keren Mertens Horn & Yiwen Kuai

<https://www.tandfonline.com/doi/full/10.1080/10511482.2017.1413584>

In brief, experimental research shows that vouchers help to reduce the rent burdens of low-income households, allow them to live in less crowded homes, and minimize the risk of homelessness. Research also shows, however, that the program has been far less successful in getting recipients to better neighborhoods and schools.

Renting in America's Large Metros: The 2017 National Rental Housing Landscape

October 7, 2017 (produced yearly)

<http://furmancenter.org/nrh/>

Renting in America's Large Metros: The 2017 National Rental Housing Landscape observes trends and makes available data on renter demographics, renter households, renter housing affordability, and the rental housing stock for each of the 53 metro areas in the sample.

Has Falling Crime Invited Gentrification?

October, 2016

Ingrid Gould Ellen, Keren Mertens Horn, Davin Reed

http://furmancenter.org/files/NYUFurmanCenter_WhitePaper_FallingCrimeGentrification_18OCT2016.pdf

This study finds that declines in city crime are associated with increases in the probability that high-income and college-educated households choose to move into central city neighborhoods, including low-income and majority minority central city neighborhoods. It also finds little evidence that households with lower incomes and without college degrees are more likely to move to cities when violent crime falls. These results hold during the 1990s as well as the 2000s and for the 100 largest metropolitan areas, where crime declines were greatest. There is weaker evidence that white households are disproportionately drawn to cities as crime falls in the 100 largest metropolitan areas from 2000 to 2010.

Desvinculado y Desigual: Is Segregation Harmful to Latinos?

July, 2015

<http://journals.sagepub.com/doi/10.1177/0002716215576092>

Ingrid Gould Ellen; Jorge De la Roca; Justin Steil

The authors find that higher levels of segregation are associated with lower black and Latino neighborhood exposure to residents with college degrees, relative to whites. They also find support for other commonly-discussed mechanisms, such as exposure to neighborhood violent crime and the relative proficiency of the closest public school.

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Effect of QAP Incentives on the Location of LIHTC Properties

April, 2015

https://www.novoco.com/sites/default/files/atoms/files/pdr_qap_incentive_location_lihtc_properties_050615.pdf

Ingrid Gould Ellen; Yiwen (Xavier) Kuai; Roman Pazuniak

Overall we find evidence suggesting that QAPs matter. Even with a small sample size of 21 states we find statistically significant relationships between changes in QAPs and the locations of tax credit allocations. We find that overall states which increased priorities towards higher opportunity areas exhibited increases in the share of tax credits allocated for projects in low poverty areas, decreases in the share of tax credits allocated for projects in high poverty areas as well as decreases in the overall exposure to poverty of projects allocated tax credits.

Low-Income Housing Policy

April, 2015

<http://www.nber.org/papers/w21071>

Robert Collinson, Ingrid Gould Ellen, Jens Ludwig

The United States government devotes about \$40 billion each year to means-tested housing programs, plus another \$6 billion or so in tax expenditures on the Low Income Housing Tax Credit (LIHTC). What exactly do we spend this money on, why, and what does it accomplish? We focus on these questions. We begin by reviewing the history of low-income housing programs in the U.S., and then summarize the characteristics of participants in means-tested housing programs and how programs have changed over time. We consider important conceptual issues surrounding the design of and rationale for means-tested housing programs in the U.S. and review existing empirical evidence, which is limited in important ways. Finally, we conclude with thoughts about the most pressing questions that might be addressed in future research in this area.

Accessibility of America's Housing Stock: Analysis of the 2011 American Housing Survey (AHS)

March, 2015

Luke Bo'sher; Sewin Chan; Ingrid Gould Ellen; Brian Karfunkel

<https://www.huduser.gov/portal/sites/default/files/pdf/accessibility-america-housingStock.pdf>

The American Housing Survey (AHS) is the most comprehensive national housing survey in the United States. Since 2009, AHS has included six core disability questions used in the American Community Survey. The questions address hearing, visual, cognitive, ambulatory, self-care, and independent living difficulties for each household member. For 2011, AHS added a topical module on accessibility. The module asked about the presence of accessibility features in housing units, including wheelchair accessibility features, and whether the accessibility features were used or not. Together, these data provide an unprecedented opportunity to examine the accessibility of the U.S. housing stock and to ask whether people with disabilities reside in accessible homes.

Race and Neighborhoods in the 21st Century

January 2015

Ingrid Gould Ellen; Jorge De la Roca; Katherine O'Regan

http://furmancenter.org/files/NYUFurmanCenter_BriefRace21stC_Jan2015.pdf

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This research brief explores the state of racial segregation in American neighborhoods, and the connection between segregation and gaps in neighborhood conditions. Based on a working paper that analyzed U.S. segregation patterns between the years 1980 and 2010, the research finds that minority groups and whites continue to live in separate and highly unequal neighborhoods. Black and Hispanic households tend to live in neighborhoods with higher poverty rates, fewer college-educated neighbors, lower-performing schools, and higher violent crime rates. Moreover, these differences in neighborhood conditions are amplified in more segregated metropolitan areas.

Do Housing Choice Voucher Holders Live Near Good Schools?

February 2014

Keren Mertens Horn, Ingrid Gould Ellen, Amy Ellen Schwartz

<https://www.sciencedirect.com/science/article/pii/S1051137713000594>

We compare the characteristics of the schools that voucher holders are likely to attend to the characteristics of those accessible to other households receiving place based housing subsidies, other similar unsubsidized households and fair market rent units within the same state and metropolitan area. These comparisons provide us with a portrait of the schools that children might have attended absent HUD assistance. In comparison to other poor households in the same metropolitan areas, we find that the schools near voucher holders have lower performing students than the schools near other poor households without a housing subsidy.

Race and Neighborhoods in the 21st Century: What Does Segregation Mean Today?

August 2013

http://furmancenter.org/files/NYUFurmanCenter_RaceNeighborhoods21stCentury_Aug2013_1.pdf

Jorge De la Roca; Ingrid Gould Ellen; Katherine O'Regan

This research finds that while segregation levels between blacks and whites have certainly declined, they remain quite high; Hispanic and Asian segregation have, meanwhile, remained unchanged. Further, this paper shows that the neighborhood environments of minorities continue to be highly unequal to those enjoyed by whites. Blacks and Hispanics continue to live among more disadvantaged neighbors, to have access to lower performing schools, and to be exposed to more violent crime. Further, these differences are amplified in more segregated metropolitan areas.

Why Do Higher Income Households Move Into Low Income Neighborhoods? Pioneering or Thrift?

December 2012

Ingrid Gould Ellen; Keren Mertens Horn; Katherine O'Regan

http://furmancenter.org/files/NYUFurmanCenter_PioneeringorThrift_Dec2012.pdf

Evidence is found that, in the US, households who place less value on neighbourhood services and those who face greater constraints on their choices are more likely to make an RLIN (relatively low-income Neighborhood) move. No evidence is found that households making RLIN moves are choosing neighbourhoods that are more accessible to employment. Rather, it is found that households making RLIN moves appear to place less weight on neighbourhood amenities than other households and more weight on housing costs.

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Do Federally Assisted Households Have Access to High Performing Schools?

November 2012

Ingrid Gould Ellen; Keren Mertens Horn

<http://furmancenter.org/files/publications/PRRACHousingLocationSchools.pdf>

This study describes the elementary schools closest to families receiving four different forms of housing assistance, and finds that families in Project-based Section 8 developments and Public Housing and recipients of Housing Choice Vouchers tend to live near schools with lower test scores than the schools near the typical poor household. Only families in Low Income Housing Tax Credit (LIHTC) housing have access to schools that are slightly better than the schools available to other poor families. The report also finds that, despite the flexibility provided by vouchers, families with Housing Choice Vouchers, on average, live near lower performing schools than families in Project-based Section 8 or LIHTC developments.

American Murder Mystery Revisited: Do Housing Voucher Households Cause Crime? **July 2012**

Ingrid Gould Ellen; Mike Lens; Katherine O'Regan

<https://www.tandfonline.com/doi/full/10.1080/10511482.2012.697913>

Systematically and empirically studying the question for the first time, this paper finds that while neighborhoods with a higher proportion of voucher holding residents tend to see higher crime rates, there was not a causal relationship. The research reveals that other neighborhood characteristics are much more significant in determining crime. Instead, it appears that voucher holders tend to move in after a neighborhood experiences a rise in crime, suggesting that the intended role of vouchers to enhance holders' neighborhood choice may be limited.

Pathways to Integration: Examining Changes in the Prevalence of Racially Integrated Neighborhoods

May 2012

http://furmancenter.org/files/publications/Pathways_to_Integration_May_2012_2.pdf

Ingrid Gould Ellen; Keren Mertens Horn; Katherine O'Regan

We begin by examining changes in the prevalence of racially integrated neighborhoods and find significant growth in the presence of integrated neighborhoods during this time period, with the share of metropolitan neighborhoods that are integrated increasing from just under 20 percent to just over 30 percent. We then shed light on the pathways through which these changes have occurred. We find both a small increase in the number of neighborhoods becoming integrated for the first time during this period and a more sizable increase in the share of integrated neighborhoods that remained integrated. Finally, we offer insights about which neighborhoods become integrated in the first place and which remain stably integrated over time.

How Low Income Neighborhoods Change: Entry, Exit, and Enhancement

March 2011

http://furmancenter.org/files/publications/How_Low_Income_Neighborhoods_Change_1.pdf

Ingrid Gould Ellen; Katherine O'Regan

In brief, our empirical findings suggest a different, and perhaps less negative, picture of low-income neighborhood gains in the 1990s than is commonly painted. We find no evidence of heightened displacement (proxied by exit rates), even among the most vulnerable, original residents, and even in the neighborhoods experiencing the largest gains. We do find that the entrance of higher income households was an important source of income gains, but we also

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find some evidence that original residents experienced gains in income. As for other changes, we find that original residents remaining in gaining neighborhoods report greater increases in their satisfaction with the neighborhood than those remaining in other low-income neighborhoods. Finally, we do not find heightened racial transition in gaining tracts.

Briefs

21st Century SROs: Can Small Housing Units Help Meet the Need for Affordable Housing in New York City?

January 2018

http://furmancenter.org/files/NYUFurmanCenter_SRObrief_14FEB2018.pdf

Jessica Yeager; Eric Stern

This brief explores the potential demand for smaller, cheaper units to help address New York City's affordable housing need. It considers the feasibility of self-contained micro units as well as efficiency units with shared kitchens and/or baths. The report considers the economics of building and operating small units and models their financial feasibility. It concludes by analyzing the main barriers to the creation of small units that exist in New York City and suggesting possible reforms that New York City can make to address these barriers.

Population and Housing in the Floodplain Battered by Hurricanes Harvey and Irma

December 2017

http://furmancenter.org/files/Floodplain_HurricaneBrief_12DEC2017.pdf

Caroline Peri; Jessica Yager; Stephanie Rosoff

In conjunction with the launch of FloodzoneData.us, the NYU Furman Center released a series of data briefs to illustrate the housing and population located in the U.S. floodplains. The third brief in the series, Population and Housing in the Floodplain Battered by Hurricanes Harvey and Irma, describes the housing and population located in the floodplains of metropolitan areas affected by hurricanes in recent months, including Houston, Miami, Tampa, and Jacksonville. The analysis describes the housing stock (including tenure, size, and number of subsidized housing units) and population demographics (including poverty rates, households with children and seniors, and race/ethnicity) in floodplains within these metro areas.

The Challenge of Rising Rents: Exploring Whether a New Tax Benefit Could Help Keep Unsubsidized Rental Units Affordable

June 2015

http://furmancenter.org/files/NYUFurmanCenter_ChallengeofRisingRents_10JUN2015.pdf

The bulk of New York City's housing stock that is affordable to low-income households is in multifamily buildings that receive no government subsidy to maintain low rents. Therefore, rising rents threaten the future affordability of this critical source of low-rent housing. The report considers whether the city could offer a benefit to protect affordability in this stock, and examines the feasibility of such a program for building owners and the city. The policy brief is third in the five-part series, Housing for an Inclusive New York: Affordable Housing Strategies for a High-Cost City.

Race and Neighborhoods in the 21st Century

January 2015

Ingrid Gould Ellen; Jorge De la Roca; Katherine O'Regan

http://furmancenter.org/files/NYUFurmanCenter_BriefRace21stC_Jan2015.pdf

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This research brief explores the state of racial segregation in American neighborhoods, and the connection between segregation and gaps in neighborhood conditions. Based on a working paper that analyzed U.S. segregation patterns between the years 1980 and 2010, the research finds that minority groups and whites continue to live in separate and highly unequal neighborhoods. Black and Hispanic households tend to live in neighborhoods with higher poverty rates, fewer college-educated neighbors, lower-performing schools, and higher violent crime rates. Moreover, these differences in neighborhood conditions are amplified in more segregated metropolitan areas.

Housing, Neighborhoods, and Opportunity: The Location of New York City's Subsidized Affordable Housing

January 2015

Ingrid Gould Ellen; Max Weselcouch

<http://furmancenter.org/research/publication/housing-neighborhoods-and-opportunity-the-location-of-new-york-citys-subsid>

This report examines changes in the location and neighborhood characteristics of subsidized rental housing in New York City. The study shows that the distribution of subsidized rental units across New York City's neighborhoods changed significantly between 2002 and 2011, not just as a result of new development, but also because of differential opt-out rates across neighborhoods. As a result, the city is losing affordable housing in the neighborhoods with the highest quality schools, lowest crime rates, and greatest access to jobs. Released in conjunction with the report, the Subsidized Housing Information Project (SHIP) is an online, searchable database of privately-owned, subsidized rental housing in New York City.

Profile of Rent-Stabilized Units and Tenants in New York City

June 2014

http://furmancenter.org/files/FurmanCenter_FactBrief_RentStabilization_June2014.pdf

In 2011, rent stabilized units comprised nearly one million units of housing in New York City--roughly 45 percent the city's rental housing stock. This report details the socioeconomic and demographic characteristics of the tenants who live in NYC's stabilized housing. It is an update to a 2012 brief, *Rent Stabilization in New York City*. It has been slightly expanded and re-released to inform the ongoing discussions about rent stabilization in New York City in advance of the June 23, 2014 Rent Guidelines Board vote to set the allowable increase for 2015 lease renewals.

Investigating the Relationship Between Housing Voucher Use and Crime

March 2013

<http://furmancenter.org/files/publications/FurmanCenter-HousingVoucherUseCrime.pdf>

Ingrid Gould Ellen; Katherine O'Regan

This policy brief debunks the long-held myth that the influx of households with vouchers causes crime in a neighborhood to increase. Rather, the report finds that housing voucher recipients tend to move into neighborhoods with high existing levels of crime. These findings should reassure communities worried about entry of voucher holders, but also raise questions about whether the Housing Choice Voucher program is reaching its stated goal of helping recipients reach "better" neighborhoods.

Appendix A

Tools

CoreData.nyc

<http://coredata.nyc/>

Data sets used:

- Decennial Census (SF and PUMS) 2000, 2010
- American Community Survey (1- and 5-year estimates, SF and PUMS) 2005 - 2016
- New York City Housing and Vacancy Survey (produced by Census for NYC)

The Furman Center's online hub for New York City housing and neighborhood data. Standardizes datasets from a variety of city, state, and federal sources to present over 100 indicators describing New York City's housing and neighborhoods like neighborhood-level information on housing markets, housing affordability, land use, demographics, and neighborhood conditions.

New York City Neighborhood Data Profiles

<http://furmancenter.org/neighborhoods>

Data sets used:

- Decennial Census (SF and PUMS) 2000, 2010
- American Community Survey (1- and 5-year estimates, SF and PUMS) 2005 - 2016
- New York City Housing and Vacancy Survey (produced by Census for NYC)

The NYU Furman Center's New York City Neighborhood Data Profiles are a one-stop platform for neighborhood indicators, providing an in-depth look at demographic, housing market, land use, and neighborhood services indicators for the city's 59 community districts.

National Rental Housing Landscape

<http://furmancenter.org/nrh/>

Data sets used:

- American Community Survey (SF and PUMS) 5-year estimates

The 2017 National Rental Housing Landscape, released by the NYU Furman Center, examines rental housing trends in the nation's largest metropolitan areas. The study includes all 53 U.S. metros with over one million people in 2015, which contained 165 million people (65 million households) and covered 63% of the U.S. population.

FloodzoneData.US

<http://furmancenter.org/floodzonedata/map>

Data sets used:

- Decennial Census 2010
- American Community Survey 2011-2015 5-year estimates

FloodzoneData.us presents data describing the housing and population located in the 100- and 500-year U.S. floodplains. Produced by the NYU Furman Center, FloodzoneData.us merges housing and population information with FEMA flood insurance rate maps to produce an interactive map and downloadable data tables at the national, state, county, and Census tract levels.