

EMERGING LEGAL ISSUES IN URBAN EDUCATION



Ensuring an Accurate Census Count in 2020

September 24, 2019



HUSCH BLACKWELL

Presenters



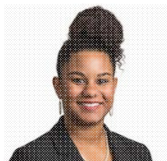
John W.
Borkowski



Julie Wright
Halbert



Gabriela Uro



Paige Duggins-
Clay



Manish Naik



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Agenda

- Background of the citizenship question on the 2020 census & litigation
- The relationship between the census and federal education funds
- Overview of the Supreme Court's June 2019 ruling in *Department of Commerce v. New York*
- Challenges to an accurate census count and ways to promote full participation
- Recommended action steps to ensure an accurate count
- Questions



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The Citizenship Question: The Administrative Record

Is this person a citizen of the United States?

Yes, born in the United States

Yes, born in Puerto Rico, Guam, the U.S. Virgin Islands, or Northern Marianas

Yes, born abroad of U.S. citizen parent or parents

Yes, U.S. citizen by naturalization – Print year of naturalization

No, not a U.S. citizen



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How did the controversy begin?

January 2017: The media publishes a draft executive order directing the Census Bureau to “include questions to determine U.S. citizenship and immigration status on the long-form questionnaire in the decennial census.”

THE WHITE HOUSE
WASHINGTON
1/23/2017

ACTION

MEMORANDUM FOR THE PRESIDENT

FROM: ANDREW BREMBERG
SUBJECT: Executive Order on Protecting American Jobs and Workers by
Strengthening the Integrity of Foreign Worker Visa Programs

(c) the Director of the U.S. Census Bureau shall include questions to determine U.S. citizenship and immigration status on the long-form questionnaire in the decennial census; and



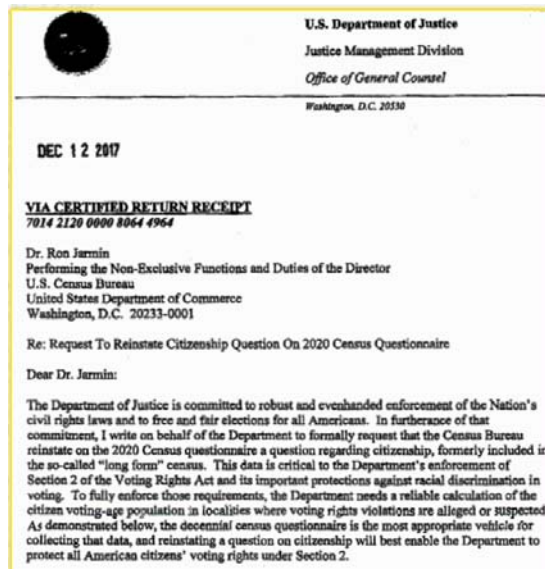
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- **Feb. 27, 2017:** The Senate votes to confirm Wilbur Ross as Secretary of Commerce, which oversees the Census Bureau.
- **March 28, 2017:** The Census Bureau sends to Congress a report of the question topics it plans to ask for the 2020 census. Citizenship is not included among those topics.
- **April – September, 2017:** Secretary Ross corresponds with various DOJ and Census Bureau officials, stating he was “puzzled” and “mystified” by the lack of the citizenship question on the 2020 census.



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- **Dec. 12, 2017:** DOJ sends a letter to the Census Bureau's Acting Director formally requesting the bureau to add a citizenship question to the 2020 census to help the department better enforce the Voting Rights Act.



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- **Jan. 19, 2018:** The Census Bureau's chief scientist, John Abowd, warns in a memo to Ross that adding a citizenship question to the 2020 census "is very costly, harms the quality of the census count, and would use substantially less accurate citizenship status data than are available" from existing government records.

We consider three alternatives in response to the request: (A) no change in data collection, (B) adding a citizenship question to the 2020 Census, and (C) obtaining citizenship status from administrative records for the whole 2020 Census population.

We recommend either Alternative A or C. Alternative C best meets DoJ's stated uses, is comparatively far less costly than Alternative B, does not increase response burden, and does not harm the quality of the census count. Alternative A is not very costly and also does not harm the quality of the census count. Alternative B better addresses DoJ's stated uses than Alternative A. However, Alternative B is very costly, harms the quality of the census count, and would use substantially less accurate citizenship status data than are available from administrative sources.



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- **March 20, 2018:** Secretary Ross testifies in Congress, stating the Commerce Dept. was “responding solely to the Department of Justice’s request” and that he was “**not aware** of any” discussions between “the president or anyone in the White House” and “[Ross] or anyone on your team about adding the citizenship question.”



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NATIONAL

Commerce Secretary Now Recalls Discussing Citizenship Question With Steve Bannon

October 11, 2018 - 4:12 PM ET
Heard on Morning Edition



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- **March 26, 2018:** Secretary Ross announces his decision to add the citizenship question to the 2020 census and directs the Census Bureau to match responses to the question with existing government records on citizenship.
- Hours later, California Attorney General Xavier Becerra files the first lawsuit against the Trump administration to get the question removed.



UNITED STATES DEPARTMENT OF COMMERCE
The Secretary of Commerce
Washington, D.C. 20230

To: Karen Dunn Kelley, Under Secretary for Economic Affairs

From: Secretary Wilbur Ross *Wilbur Ross*

Date: March 26, 2018

Re: Reinstatement of a Citizenship Question on the 2020 Decennial Census Questionnaire

I therefore asked the Census Bureau to develop a fourth alternative, **Option D**, which would combine Options B and C. Under Option D, the ACS citizenship question would be asked on the decennial census, and the Census Bureau would use the two years remaining until the 2020 decennial census to further enhance its administrative record data sets, protocols, and statistical models to provide more complete and accurate data. This approach would maximize the Census Bureau's ability to match the decennial census responses with administrative records. Accordingly, at my direction the Census Bureau is working to obtain as many additional Federal and state administrative records as possible to provide more comprehensive information for the population.



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- **March 29, 2018:** The Census Bureau sends a report of the questions it plans to ask for the 2020 census to Congress, including the new citizenship question approved by Ross.

Is this person a citizen of the United States?

Yes, born in the United States

Yes, born in Puerto Rico, Guam, the U.S. Virgin Islands, or Northern Marianas

Yes, born abroad of U.S. citizen parent or parents

Yes, U.S. citizen by naturalization – *Print year of naturalization*

No, not a U.S. citizen



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Lawsuits filed

- *California v. Ross* (N.D. California)
- *New York v. United States Dep't of Commerce* (S.D.N.Y.)
- *Kravitz v. U.S. Dep't of Commerce* (D. Maryland)
- *City of San Jose v. Ross* (N.D. California)
- *La Union Del Pueblo Entero v. Ross* (D.Maryland)
- *New York Immigration Coal. v. U.S. Dep't of Commerce* (S.D.N.Y.)
- *Electronic Privacy Information Center v. U.S. Dep't of Commerce* (D.D.C.)



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Three Claims

- **Failure to make “actual Enumeration”** (U.S. Constitution, First Amendment Enumeration Clause)
- **Intentional Discrimination** (U.S. Constitution Fourteenth Amendment, Equal Protection Clause)
- **“Arbitrary & Capricious”** executive action (Administrative Procedure Act)



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An “actual Enumeration” . . .

*“Representatives and direct Taxes shall be apportioned among the several States which may be included within this Union, according to their respective Numbers The **actual Enumeration shall be made** within three Years after the first Meeting of the Congress of the United States, and **within every subsequent Term of ten Years, in such Manner as they shall by Law direct.**”*

U.S. Constitution, Article 1, Section 2



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. . . in such Manner as they shall by Law direct.

*“The Secretary shall, in the year 1980 and every 10 years thereafter, **take a decennial census of population** as of the first day of April of such year, which date shall be known as the “decennial census date,” **in such form and content as he may determine**, including the use of sampling procedures and special surveys. In connection with any such census, the Secretary is authorized to obtain such other census information as necessary.”*

-13 U. S. C. § 141(a)



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13 U.S.C. § 6

(a) The Secretary . . . may call upon any other department, agency, or establishment of the Federal Government . . . for information pertinent to the work provided for in this title.

(b) The Secretary may acquire . . . from States, counties, cities, or other units of government, or their instrumentalities, or from private persons and agencies, such copies of records, reports, and other material as may be required for the efficient and economical conduct of the censuses and surveys provided for in this title.

(c) To the maximum extent possible and consistent with the kind, timeliness, quality and scope of the statistics required, the Secretary shall acquire and use information available from any source referred to in subsection (a) or (b) of this section instead of conducting direct inquiries.



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Administrative Procedure Act

“The reviewing court shall—

(2) hold unlawful and set aside agency action, findings, and conclusions found to be—

(A) **arbitrary, capricious, an abuse of discretion,** or otherwise not in accordance with law;

-5 U. S. C. § 706(2)(A)



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No. 18-966

IN THE
Supreme Court of the United States

UNITED STATES DEPARTMENT OF COMMERCE, ET AL.,
Petitioners,

v.

NEW YORK, ET AL.,
Respondents.

On Writ of Certiorari to the United States Court
of Appeals for the Second Circuit

BRIEF FOR THE COUNCIL OF THE
GREAT CITY SCHOOLS AS AMICUS CURIAE IN
SUPPORT OF RESPONDENTS



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The Argument: A “Differential Undercount”

- The “differential undercount rate” is “[t]he difference between the net undercount rate for a particular demographic or geographic domain and the net undercount rate either for another domain or for the nation.” (U.S. Census Bureau)
- The Secretary admitted that reinstating a citizenship question would reduce the response rate for noncitizens and Hispanics, and agreed that could reduce the accuracy of the decennial census.
- Expert estimated, and district court found, that the citizenship question would cause “an incremental net differential decline in self-responses among noncitizen households of at least **5.8%**” and could cause a much higher net differential. The court also found that Hispanic households will similarly experience a decline in responsiveness.



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Undercount Impact on Federal Education Funds: Title I

- Purpose: “to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps.” 20 U.S.C. § 6301 (2015).
- Congress authorized appropriations of over sixty billion dollars for Title I programs for FYs 2017-20.
- Dollars allocated to entities based on four formulas derived from demographic information (especially poverty status) from the census.



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Example: Basic Allotment Formula

To allocate Title I funds, the Department of Education determines “the number of children aged 5 to 17, inclusive, from families below the poverty level on the basis of the most recent satisfactory data . . . available from the Department of Commerce.” 20 U.S.C. § 6333(c)(2).

(C) CRITERIA OF POVERTY.—In determining the families that are below the poverty level, the Secretary shall use the criteria of poverty used by the Bureau of the Census in compiling the most recent decennial census, as the criteria have been updated by increases in the Consumer Price Index for All Urban Consumers, published by the Bureau of Labor Statistics.



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Table 1: CGCS Total National Misallocation of Title I Funds that Would Result from the Inclusion of a Citizenship Question on the Decennial Census

Total 5-17 Population from Families with One or More Foreign-born Parents	13,023,893
Noncitizen Percentage of Foreign-born Population	51.9%
Number of Students Ages 5-17 with One or More Noncitizen Parents	6,759,400
Noncitizen Poverty Percentage	24%
Number of Poor Students Ages 5-17 with One or More Noncitizen Parents	1,622,256
Estimated Census Undercount of Poor Students Ages 5-17 with One or More Noncitizen Parents 2%	32,445
Estimated Census Undercount of Poor Students Ages 5-17 with One or More Noncitizen Parents 5.8%	94,091
Estimated Census Undercount of Poor Students Ages 5-17 with One or More Noncitizen Parents 10%	162,226
Title I Allocation Per Pupil	\$1,613
Estimated Title I Misallocation with a 2% Undercount	-\$52,321,916
Estimated Title I Misallocation with a 5.8% Undercount	-\$151,733,558
Estimated Title I Misallocation with a 10% Undercount	-\$261,609,582

Table 3A: Baseline Demographic and Population Data and Application of Dr. Reamer's Methodology to NYC

Demographic Data	
U.S. Population	351,120,745
U.S. Noncitizens	22,337,765
U.S. Hispanic Population	61,797,251
City Population	8,560,072
City Noncitizen Population	1,427,099
City Hispanic Population	2,490,981
USA 5-17 Total	54,223,426
School District Ages 5-17 in Poverty	304,745
School District Title I Allocation Total (FY 2019)	\$781,914,595.61
U.S. Population Scenarios	
U.S. Baseline	351,120,745
(1) 2% of noncitizens are not counted in the 2020 Census:	350,673,990
(2) 2% of noncitizens <i>and</i> Hispanics are not counted:	349,438,045
(3) 5.8% of noncitizens are not counted:	349,825,155
(4) 5.8% of noncitizens <i>and</i> Hispanics are not counted:	346,240,914
(5) 10% of noncitizens are not counted:	348,886,969
(6) 10% of noncitizens <i>and</i> Hispanics are not counted:	342,707,243

Estimated Title I Losses for Six Urban School Districts Based on Dr. Reamer's Methodology

Title I Reduction						
School District	Undercount 2% Noncitizens	Undercount 2% Noncitizens/Hispanic	Undercount 5.8 % Noncitizens	Undercount 5.8 % Noncitizens/Hispanic	Undercount 10% Noncitizens	Undercount 10% Noncitizens/Hispanic
Chicago	-\$297,332	-\$942,727	-\$864,354	-\$2,759,154	-\$1,494,274	-\$4,806,213
Clark County	-\$119,963	-\$423,793	-\$348,738	-\$1,240,347	-\$602,890	-\$2,160,581
Dallas	-\$231,880	-\$753,030	-\$674,084	-\$2,203,951	-\$1,165,339	-\$3,839,096
Los Angeles	-\$1,160,039	-\$3,990,081	-\$3,372,277	-\$11,678,080	-\$5,829,906	-\$20,342,230
Miami-Dade County	-\$482,788	-\$1,915,561	-\$1,403,482	-\$5,606,422	-\$2,426,303	-\$9,765,915
New York City	-\$1,614,320	-\$3,427,093	-\$4,692,887	-\$10,030,341	-\$8,112,942	-\$17,472,008

Estimated Impact of a Census Undercount on Title I Funding for Six Urban Districts

Table 4C: Title I Per Pupil Allocations and Estimated Losses

School District	Title I Allocation Per Pupil	Estimated Title I Loss with a 2% Undercount	Estimated Title I Loss with a 5.8% Undercount	Estimated Title I Loss with a 10% Undercount
Chicago	\$2.750	-\$1,066,229	-\$3,092,064	-\$5,331,144
Clark County	\$1.602	-\$403,395	-\$1,169,845	-\$2,016,975
Dallas	\$1.683	-\$353,835	-\$1,026,121	-\$1,769,174
Los Angeles	\$2.289	-\$1,242,922	-\$3,604,475	-\$6,214,611
Miami	\$1.671	-\$495,508	-\$1,436,973	-\$2,477,540
New York	\$2.505	-\$3,689,659	-\$10,700,011	-\$18,448,295

Undercount Impact on Federal Education Funds: IDEA

- IDEA provides states with federal funds to support the provision of a free, appropriate public education (“FAPE”) to eligible children with disabilities.
- The IDEA Part B State Grant Program is the second largest federal elementary and secondary education discretionary grant program.
- IDEA Part B funds are distributed primarily based on their share of the national child population and the national population of children living in poverty, as determined, in part, by the Census Bureau through the decennial census.



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Majority: The Enumeration Clause permits use of a citizenship question . . .

- “The Enumeration Clause of the Constitution does not provide a basis to set aside the Secretary’s decision. The text of that clause ‘vests Congress with virtually unlimited discretion in conducting the decennial actual Enumeration,’ and Congress ‘has delegated its broad authority over the census to the Secretary.”
- “In light of the early understanding of and long practice under the Enumeration Clause, we conclude that it permits Congress, and by extension the Secretary, to inquire about citizenship on the census questionnaire.”



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Majority: The Secretary's decision was supported by *some* evidence.

- **Standard:** Whether the Secretary examined “the relevant data” and articulated “a satisfactory explanation” for his decision, “including a rational connection between the facts found and the choice made.”
- **Held:** “[T]he choice between reasonable policy alternatives in the face of uncertainty was the Secretary’s to make. He considered the relevant factors, weighed risks and benefits, and articulated a satisfactory explanation for his decision.”
- **Reasoning:** “Noncitizen households might disproportionately fail to respond to a lengthy and intrusive Government questionnaire for a number of reasons besides reluctance to answer a citizenship”



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Pretext: Governing Principles

- An agency must “disclose the basis” of its action.
- A court is ordinarily limited to evaluating the agency’s contemporaneous explanation in the existing administrative record.
- A court may not reject an agency’s stated reasons for acting simply because it might also have had other unstated reasons.
- A court may not set aside an agency’s policymaking decision solely because it might have been influenced by political considerations or prompted by an Administration’s priorities.
- “Narrow exception:” a court may inquire into “the mental processes of administrative decisionmakers” upon a “strong showing of bad faith or improper behavior,” and may justify extra-record discovery.



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District Court Pretext Analysis

- “Th[e] evidence showed that the Secretary was **determined** to reinstate a citizenship question from the time he entered office; **instructed** his staff to make it happen; **waited** while Commerce officials explored whether another agency would request census-based citizenship data; subsequently **contacted** the Attorney General himself to ask if DOJ would make the request; and **adopted** the Voting Rights Act rationale late in the process.”
- “[T]his evidence established that the Secretary had made up his mind to reinstate a citizenship question **‘well before’** receiving DOJ’s request, and did so for reasons unknown but **unrelated** to the VRA.”



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Majority: The administrative record supported the district court’s pretext finding.

- “It is hardly improper for an agency head to come into office with policy preferences and ideas, discuss them with affected parties, sound out other agencies for support, and work with staff attorneys to substantiate the legal basis for a preferred policy.”
- “[V]iewing the evidence as a whole, . . . the decision to reinstate a citizenship question cannot be adequately explained in terms of DOJ’s request for improved citizenship data to better enforce the VRA.”
- **“Significant mismatch”** between Secretary’s decision and rationale:
 - Record indicates that Commerce went to great lengths to elicit the request from DOJ (or any other willing agency).
 - “[T]he VRA enforcement rationale—the sole stated reason—seems to have been contrived.”



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- “We do not hold that the agency decision here was substantively invalid. But agencies must pursue their goals reasonably. Reasoned decisionmaking under the Administrative Procedure Act calls for an explanation for agency action. What was provided here was more of a distraction.”



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The Administration abandons litigation and instead pursues Executive Action



“I am hereby ordering every department and agency in the federal government to provide the Department of Commerce with all requested records regarding the number of citizens and noncitizens in our country. . . . They must furnish all legally accessible records in their possession immediately. We will utilize these vast federal databases to gain a full, complete, and accurate count of the noncitizen population.” (July 2019)



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Remaining Litigation on the 2020 Census

New York et al. v. Dept. of Commerce

- The district court is now considering, among other things, claims that the federal government's attorneys and witnesses should be sanctioned for their actions in the case.



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Remaining Litigation on the 2020 Census

NAACP v. Bureau of the Census

- Lawsuit filed on behalf of residents of Prince George's County alleging that the Bureau's funding shortfalls, understaffing, inadequate planning, and insufficient testing of new technology will produce a severe undercount of communities of color, in violation of the Constitution's Enumeration Clause
- Plaintiffs seek court order requiring the Bureau to develop a plan to conduct a full enumeration
- August 1, trial court dismissed second amended complaint as moot after Congress passed an appropriations bill in February 2019
- Appeal scheduled for expedited oral argument on October 30



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Remaining Litigation on the 2020 Census

La Union Del Pueblo Entero v. Ross & Kravitz v. United States Dep't of Commerce

- Consolidated cases in MD by Latino & Asian-American groups and citizens of MD & AZ
- Lawsuit alleged the addition of the citizenship question violates the Constitution & APA, including claim of intentional discrimination under the Equal Protection Clause of the 14th Amendment
- After bench trial, judgment in favor of Plaintiffs on APA and Enumeration Clause claims
- In June 2019, the 4th Cir. granted plaintiffs' request to remand the case for further discovery on their equal protection claims in light of newly discovered evidence regarding the Trump administration's reason for adding the citizenship question.



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Lasting Impact?

- Continued hostile discourse on race/ethnic issues and immigration
- Continued government actions that destabilize and entrench distrust among immigrant communities (e.g., highly publicized ICE raids)
- Shifts in how 2020 Census will be conducted:
 - The primary response option will be the internet
 - Increased reliance on administrative & third-party data
 - Continued underfunding of Census Bureau and reduction in local census offices and field staff



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How can schools promote full participation?



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Why Every Kid Counts

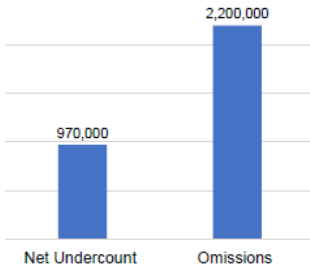
- Stronger political representation at every level (including state, federal and school board districts)
- Funding for vital education, health, and other critical social services (e.g., Head Start, Medicaid, CHIP, foster care)
- Equitable distribution of funds
- Better planning of infrastructure and human resources
- Accurate data to measure child well-being
- Data will impact children for a decade



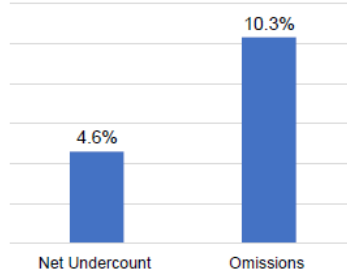
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One in 10 Young Children were Missed in the 2010 Census

Net Undercounts and Omissions Population Numbers for Age 0 to 4



Net Undercounts and Omissions Rates for Age 0 to 4

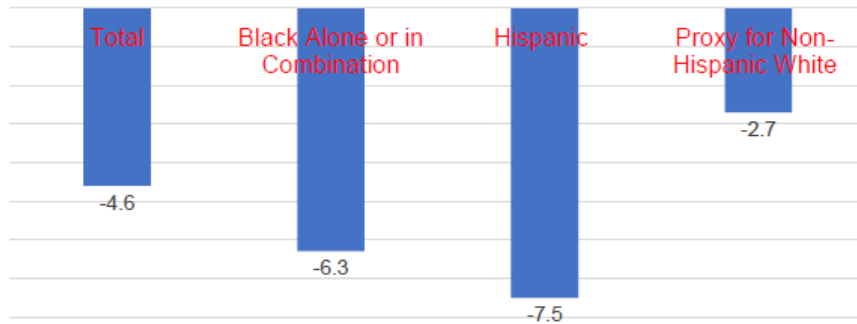


Source: Hogan and Griffin 2016



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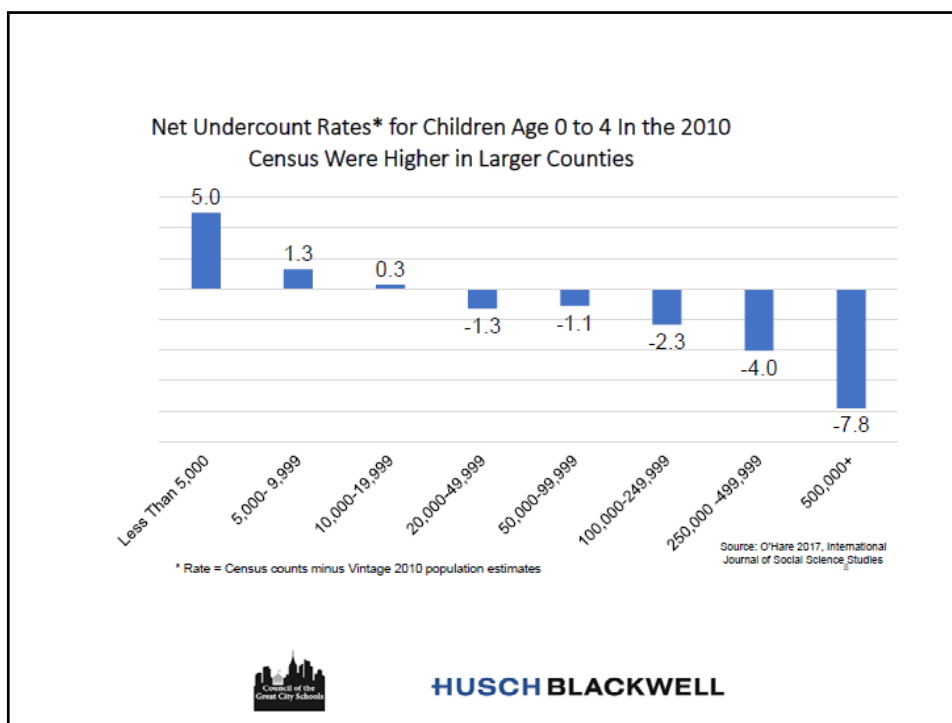
2010 Census Net Undercount Rates for Children Age 0 to 4 by Race and Hispanic Origin





Source: U.S. Census Bureau, May 2012 DA Release



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Why are children difficult to count?

- Young children are often missed because they are left off of a form completed by an adult in their household
 - Research shows that 2 out of 3 missed children live in “Complex Households”
 - Multi-generational households
 - Extended families
 - Multi-family households
 - Foster family households
 - Fear & confusion
 - 6.4 million children age 0-17 live with at least one undocumented parent
 - Inadequate education around the purpose and goals of the census
- 
- 

Other Factors

- Young parents or caretakers
- Living in rental housing unit
- Living in multi-unit structure
- Recent or frequent address changes
- Below poverty level
- Living with one parent or two unmarried parents



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Reminder: Confidentiality and the Census Act

“No department, bureau, agency, officer, or employee of the Government, except the Secretary in carrying out the purposes of this title, shall require, for any reason, copies of census reports which have been retained by any such establishment or individual. Copies of census reports which have been so retained shall be immune from legal process, and **shall not, without the consent of the individual or establishment concerned, be admitted as evidence or used for any purpose** in any action, suit, or other judicial or administrative proceeding.”

-13 U.S.C. § 9



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How can schools promote full participation?



- <https://countallkids.org/>



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Count All Kids Campaign

- Support state and local advocacy efforts to:
 - Form Complete Count Committees, including priority on counting young children
 - Work with Complete Count Committees to build effective plans, develop tools to locate areas with undercounted kids, and prepare outreach materials tailored to families with young children
 - Encourage community partners and providers to use and distribute outreach materials



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How can your school participate?

- Advocate for Complete Count Committees in your community
- Send representatives to advise or participate in a Complete Count Committee
- Use and distribute Committee and Count All Kids materials and resources
- Host community events explaining the significance of the 2020 Census
- Use parent phone and email systems to update parents on Census process and any problems
- Use Statistics in Schools program materials to encourage interest and participation



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Resources

- <http://www.countallkids.org/>
- <http://www.censuscounts.org/>
- <https://www.census.gov/library/visualizations/2018/comm/counting-children-2020.html>
- <https://www.census.gov/programs-surveys/decennial-census/2020-census/research-testing/undercount-of-young-children.html>
- CGCS 2020 Census Resources:
<https://www.cgcs.org/domain/302>



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QUESTIONS



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Husch Blackwell Blog

Providing legal insights about:

- ED Guidance
- Special Education
- Title IX
- Discrimination
- Promoting Diverse School Enrollments

The screenshot shows the Husch Blackwell website header with navigation links for Home, About, Services, and Contact. Below the header is a blue banner with the text "K-12 Legal Insights". The main content area features a post titled "Department of Education's Recent Guidance on Students with ADD and ADHD: What Are Your Responsibilities?" by John Borowski & Alexis Oslag, dated August 24, 2016. The post is categorized under "EQUITY, SPECIAL EDUCATION". A snippet of the article text is visible: "On July 26, 2016, the U.S. Department of Education's Office for Civil Rights ('OCR') issued a Dear Colleague". To the right of the post is a search bar and a "STAY CONNECTED" section with social media icons and a "Subscribe to this blog" form with a "SUBSCRIBE" button.



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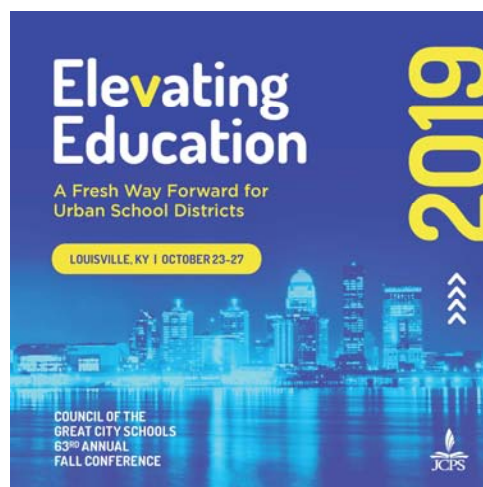
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November 14, 2019
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**Stay tuned for more
information on the topic!**



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