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12 UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

13 NATIONAL URBAN LEAGUE; LEAGUE OF
 14 WOMEN VOTERS; BLACK ALLIANCE FOR
 JUST IMMIGRATION; HARRIS COUNTY,
 15 TEXAS; KING COUNTY, WASHINGTON;
 CITY OF LOS ANGELES, CALIFORNIA; CITY
 16 OF SALINAS, CALIFORNIA; CITY OF SAN
 JOSE, CALIFORNIA; RODNEY ELLIS; AND
 17 ADRIAN GARCIA,

18 Plaintiffs,

19 v.

20
 21 WILBUR L. ROSS, JR., IN HIS OFFICIAL
 CAPACITY AS SECRETARY OF COMMERCE;
 22 U.S. DEPARTMENT OF COMMERCE;
 STEVEN DILLINGHAM, IN HIS OFFICIAL
 23 CAPACITY AS DIRECTOR OF THE U.S.
 CENSUS BUREAU; AND U.S. CENSUS
 24 BUREAU,

25 Defendants.

No. 5:20-cv-05799-LHK

**BRIEF OF THE AMICI CURIAE STATES
 AND LOCAL GOVERNMENTS IN
 SUPPORT OF PLAINTIFFS**

Hearing Date: September 17, 2020
 Time: 1:30 p.m.
 Place: Courtroom 8, 4th Floor

Judge: Hon. Lucy H. Koh

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27 Vermont Complete Count Committee Meeting (Aug. 20, 2020),

28 <https://tinyurl.com/y45h8s5d>3

INTEREST OF AMICI CURIAE

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2 Amici States of New York, California, Colorado, Connecticut, Delaware, Hawai'i, Illinois,
3 Maryland, Massachusetts, Michigan, Minnesota, Nevada, New Jersey, New Mexico, North Carolina,
4 Oregon, Pennsylvania, Rhode Island, Vermont, Virginia, Washington, and Wisconsin—as well as the
5 District of Columbia; El Paso County, and Hidalgo and Cameron Counties, Texas; Howard County,
6 Maryland; the Cities of Central Falls, Rhode Island; Columbus, Ohio; Philadelphia and Pittsburgh,
7 Pennsylvania; Phoenix, Arizona; and the U.S. Conference of Mayors—file this amicus curiae brief to
8 support plaintiffs' request for a stay or preliminary injunction against the Census Bureau's "Rush Plan."
9 The Rush Plan is a precipitous and unexplained policy change to the 2020 census that shortens the
10 schedule for the Bureau's data-collection and data-processing efforts, including by reducing the time for
11 both self-responses and non-response follow-up operations from October 31 to September 30. As
12 plaintiffs have established, the Rush Plan hamstrings ongoing efforts to conduct the census—particularly
13 given the obstacles posed by the ongoing COVID-19 pandemic—and thus impairs the accuracy of the
14 Bureau's enumeration of the total population of each State.

15 Amici have a direct stake in this dispute. The decennial census determines the States' political
16 representation in Congress, provides critical data for the States' own redistricting efforts, and affects
17 hundreds of billions of dollars in federal funding to States and localities. An inaccurate census will
18 directly impair those interests, inflicting harms that will persist for the next decade. Amici's interests
19 thus confirm the urgent need for the relief that plaintiffs have requested.

20 Amici also have direct experience in defending the integrity of the 2020 census against efforts
21 by these defendants to manipulate that constitutionally required process—including their failed effort to
22 add a citizenship question, and their ongoing campaign to exclude undocumented immigrants from the
23 population count used for congressional apportionment. What those efforts have in common is
24 defendants' disregard of unambiguous constitutional or statutory requirements; their conscious
25 deviation from centuries of consistent practice; and their failure to deal honestly with the public and the
26 courts. This backdrop provides relevant context for this Court's evaluation of the reasonableness or
27 good-faith basis of the Rush Plan.

ARGUMENT

A. The Census Bureau’s Rush Plan Will Impair the Accuracy of the Constitutionally Required Enumeration of Total Population.

The “decennial enumeration of the population is one of the most critical constitutional functions our Federal Government performs.” Pub. L. No. 105-119, § 209(a)(5), 111 Stat. 2440, 2481 (1997). The mandate to conduct a decennial census requires a person-by-person count, not a statistical estimate. *Department of Commerce v. United States House of Reps.*, 525 U.S. 316, 334-35 (1999). And the census must be “as accurate as possible, consistent with the Constitution” and the law. Pub. L. No. 105-119, § 209(a)(6), 111 Stat. at 2481; *see also Utah v. Evans*, 536 U.S. 452, 478 (2002) (explaining Framers’ “strong constitutional interest in accuracy” for the enumeration); *Federation for Am. Immigration Reform v. Klutznick*, 486 F. Supp. 564, 567 (D.D.C. 1980) (three-judge court) (noting that enumeration is “straightforward head count, as accurate as is reasonably possible”).

Fulfilling the constitutional requirement to conduct an accurate enumeration is an enormous responsibility—one that is often described as the largest civilian mobilization conducted in the United States.¹ In modern times, the Bureau has begun by asking every household in the country to respond to a questionnaire asking for the number of persons in each household and some basic demographic information. But self-response rates do not come close to providing a full picture of this country’s total population. The Bureau thus conducts non-response follow-up (NRFU) operations to fill the gap—an essential component of its ability to ensure that every person is counted. *See Compl.* ¶¶ 72-76.

The Rush Plan cuts short the time for both self-response and NRFU operations from October 31 to September 30—a reduction in the overall time that the Bureau itself had earlier said was necessary to conduct an accurate count, and an alteration of a deadline that the Bureau had adopted specifically to accommodate the unique difficulties posed by the COVID-19 pandemic. *See Pls.’ Mot. for Stay & Prelim. Inj. (Pls.’ Mot.)* at 7-9. This abrupt and unexplained curtailment of the Census Bureau’s data-collection efforts will inevitably harm the accuracy of the population count.

¹ U.S. Census Bureau, *2020 Census Research, Operational Plans, and Oversight: About* (last visited Aug. 28, 2020), <https://www.census.gov/programs-surveys/decennial-census/2020-census/about.html>.

1 Even before the COVID-19 crisis, the Bureau was predicting significant difficulties with the
2 2020 census that would require more, rather than less, NRFU. “Rates of self-response to Census Bureau
3 surveys have been in general decline, as people are overloaded with requests for information and [are]
4 increasingly concerned about sharing information.” *New York v. United States Dep’t of Commerce*, 351
5 F. Supp. 3d 502, 583 (S.D.N.Y. 2019) (quotation marks omitted). The COVID-19 pandemic has only
6 exacerbated this problem: as of the date of this filing, self-response rates for 2020 are still behind the
7 rates for 2010 in most States—including New York, California, and Vermont—despite the extended
8 time that households have been given to respond.²

9 These deficiencies would ordinarily warrant more rather than fewer efforts to reach
10 nonresponsive households to ensure that they are counted. But defendants here have inexplicably gone
11 in the opposite direction—cutting short these efforts without any apparent plan to address the significant
12 undercounts that their Rush Plan will create.

13 Even worse, the harms of this undercount will fall disproportionately on certain States and
14 localities. It has long been understood that specific populations are particularly difficult to enumerate
15 accurately because they respond to the census at lower rates compared to the general population. “Racial
16 and ethnic minorities, immigrant populations, and non-English speakers have historically been among
17 the hardest groups to count.” *New York*, 351 F. Supp. 3d at 577. And the differential undercount of these
18 populations also has a disproportionate impact on the States that have relatively larger shares of these
19 populations, including several of the amici here. For example, as of the date of this filing, New York’s
20 self-response rate remains approximately four percent below the national rate.³

21 The Rush Plan thus threatens to undermine the accuracy of the 2020 decennial census by
22 eliminating a full month that the Census Bureau had previously committed to use to accept self-
23 responses and to conduct critical NRFU operations. And defendants have hamstrung the Bureau’s efforts

24 ² See Census 2020 Hard to Count Map, *Mapping Response Rates for a Fair and Accurate 2020*
25 *Census* (last visited Aug. 28, 2020) <https://www.censushardtcountmaps2020.us/> (showing that New
26 York’s self-response rate in 2020 is nearly four percent lower than it was in 2010); *Vermont Complete*
27 *Count Committee Meeting 2* (Aug. 20, 2020), <https://tinyurl.com/y45h8s5d> (“Vermont is currently
28 seventh place from last among states and Puerto Rico for Self-response.”).

³ See U.S. Census Bureau, *Response Rates* (last updated Aug. 26, 2020),
<https://2020census.gov/en/response-rates.html>.

1 at a time when the COVID-19 crisis requires the dedication of more efforts, not fewer, for an accurate
2 count. The relief requested by plaintiffs is urgently needed to redress the harms of defendants' actions.

3 **B. An Inaccurate Census Will Seriously Harm the States and Their Residents.**

4 Differential undercounts of total populations will have serious consequences for amici. The
5 enumeration not only "provide[s] a basis for apportioning representatives among the states in the
6 Congress," *Baldrige v. Shapiro*, 455 U.S. 345, 353 (1982); it also "serves as a linchpin of the federal
7 statistical system by collecting data on the characteristics of individuals, households, and housing units
8 throughout the country," *House of Reps.*, 525 U.S. at 341 (quotation marks omitted). Amici focus here
9 on two of the most serious consequences of an inaccurate census: the effects on political representation
10 and the loss of federal funding.

11 1. An inaccurate census threatens harm to the political representation of amici and their residents
12 both on an interstate and intrastate basis.

13 Interstate harm would come from the effect that a differential undercount has on congressional
14 apportionment. The Constitution requires that seats in the House of Representatives "shall be
15 apportioned among the several States according to their respective numbers, counting the whole number
16 of persons in each State, excluding Indians not taxed." U.S. Const. amend. XIV, § 2; *see id.* art. I, § 2,
17 cl. 3. The "respective Numbers" of "the whole Number of free Persons" in each State must in turn be
18 based on the "actual Enumeration" of all persons living here that is determined by the decennial census.
19 *Id.* art. I, § 2, cl. 3.

20 In the litigation over defendants' failed efforts to add a citizenship question to the 2020 census
21 questionnaire, the district court found that "a mere 5.8% differential undercount" of "noncitizen
22 households and Hispanics" would almost certainly cause California to lose a House seat, and raised a
23 "significant risk of an apportionment loss" to New York, Arizona, Florida, Illinois, and Texas, as well.
24 *New York*, 351 F. Supp. 3d at 594. Such a loss would deprive these States of political power in Congress
25 for a decade, hampering their efforts to serve their residents and depriving them of the representation to
26 which they would otherwise be entitled. *See* Pls.' Mot. at 29-30.

1 Amici will also face intrastate harm because census data is also used for state redistricting of
 2 both congressional and state legislative seats. *See House of Reps.*, 525 U.S. at 334 (“States use the
 3 population numbers generated by the federal decennial census for federal congressional redistricting.”);
 4 *see, e.g.*, N.Y. Const. art. III, §§ 4-5, 5-a. Just as there are differential undercounts between States, there
 5 are also significant differentials between areas within each State. And, as the district court found in the
 6 citizenship-question litigation, just a two percent differential undercount would be enough to materially
 7 alter the statewide population shares of many municipalities, including New York City; Philadelphia
 8 and Pittsburgh, Pennsylvania; Chicago, Illinois; and Prince George’s County, Maryland. *New York*, 351
 9 F. Supp. 3d at 595.

10 2. An inaccurate enumeration will also affect amici’s entitlement to hundreds of billions of
 11 dollars of federal funding that are dependent on the decennial census’s population count.

12 In particular, at least eighteen federal programs distribute financial assistance based in whole or
 13 in part upon each State’s relative share of the total U.S. population. (Addendum (Add.) 4.⁴) *See New*
 14 *York*, 351 F. Supp. 3d at 596 n.44 (listing programs). Another six federal programs distribute funding
 15 based on the Federal Medical Assistance Percentage reimbursement formula, which is also “sensitive to
 16 changes in the decennial census count” because of the way that formula is calculated. *See id.* at 596.

17 Even small differential undercounts from the decennial census will cause amici and their
 18 residents to lose access to this important federal funding. For example, just a two percent differential
 19 undercount will cause various amici to lose funding from the Supplemental Nutrition Program for
 20 Women, Infants, and Children; Social Services Block Grants; Community Services Block Grants; Title
 21 I Grants to Local Educational Authorities; Temporary Assistance for Needy Families; the Low-Income
 22 Home Energy Assistance Program; the Children’s Health Insurance Program; and more. *Id.* at 597-98.
 23 (Add. 13-26.)

24 Title I Grants to Local Educational Authorities provide a particularly stark example of how even
 25 very small undercounts can have significant funding consequences for amici. This program provides

26
 27 ⁴ These addendum citations are to an expert declaration submitted by Dr. Andrew Reamer in
 28 *New York v. United States Dep’t of Commerce*, 351 F. Supp. 3d 502 (S.D.N.Y. 2019). The district court
 found “Dr. Reamer’s testimony to be credible, and his analysis persuasive.” *Id.* at 597.

1 funding to schools based on the census’s population count of children living in poverty.⁵ New York has
 2 estimated that just a 1.54 percent reduction in the count of such children could cause a local educational
 3 authority to lose nearly \$300,000 in funding—the equivalent of six full-time academic support teachers.
 4 (Add. 31.⁶) And for many of the programs that would be affected by an inaccurate census count, the
 5 harms would be felt by the most vulnerable and at-risk populations who are in greatest need of federal
 6 financial assistance.

7 **C. The Rush Plan Is Part of a Broader Effort by Defendants to Interfere with the**
 8 **Decennial Census.**

9 This Court should not review the validity of the Rush Plan in a vacuum. Whatever justifications
 10 defendants may belatedly provide for the Rush Plan, such *post hac* rationalizations must be viewed
 11 against the context of a nearly four-year effort by defendants to repeatedly disrupt the decennial census.

12 That effort began with Commerce Secretary Wilbur Ross’s decision to add a citizenship question
 13 to the census shortly after his appointment in February 2017. Secretary Ross pursued this decision
 14 despite warnings from the Census Bureau that adding the question would undermine the accuracy of the
 15 enumeration. And rather than transparently disclosing his actual objective, Secretary Ross instead
 16 presented to the courts and to the public a “contrived” rationale that did not come close to matching the
 17 actual steps he had taken. *Department of Commerce v. New York*, 139 S. Ct. 2551, 2575 (2019).

18 More recently, President Trump announced a new policy to exclude undocumented immigrants
 19 from the apportionment base used to allocate House seats and directed defendants to prepare numbers
 20 from the decennial census to enable the implementation of that policy. *Memorandum on Excluding*
 21 *Illegal Aliens from the Apportionment Base Following the 2020 Census*, 85 Fed. Reg. 44,679, 44,680
 22 (July 23, 2020). That exclusion would fly in the face of centuries of history in which the decennial
 23 census has never excluded inhabitants of the States based solely on their immigration status (or other

24 _____
 25 ⁵ See generally U.S. Dep’t of Educ., *Improving Basic Programs Operated by Local Educational*
Agencies (Title I, Part A) (last updated Oct. 24, 2018), <https://www2.ed.gov/programs/titleiparta/index.html>.

26 ⁶ This addendum citation is to an affidavit submitted by Jason Harmon, Director of the Office of
 27 the Every Student Succeeds Act Funded Programs at the New York State Education Department, in *New*
York v. United States Dep’t of Commerce, 351 F. Supp. 3d 502 (S.D.N.Y. 2019). The district court relied
 28 on this affidavit to support its finding that the governmental plaintiffs in that lawsuit would lose federal
 funding due to a differential undercount. *Id.* at 597.

1 legal status). *See Evenwel v. Abbott*, 136 S. Ct. 1120, 1128-29 (2016) (recognizing that the Framers of
2 the Fourteenth Amendment chose to “allocat[e] House seats to States” with “total population as the
3 congressional apportionment base”); *Wesberry v. Sanders*, 376 U.S. 1, 13 (1964) (“[W]hen the delegates
4 agreed that the House should represent ‘people’ they intended that in allocating Congressmen the
5 number assigned to each State should be determined solely by the number of the State’s inhabitants.”).
6 And it would disregard the repeatedly expressed intent of the Framers of the Fourteenth Amendment to
7 include “the entire immigrant population . . . in the basis of representation.” *Cong. Globe*, 39th Cong.,
8 1st Sess. 432 (1866) (Rep. Bingham).

9 In other words, defendants have for nearly four years made decisions regarding the decennial
10 census that have disregarded the pointed recommendations of the Bureau’s own experts; that were
11 publicly justified with rationales later found to be pretextual; and that flouted unambiguous constitutional
12 and statutory mandates. Given this context, this Court should at minimum treat with skepticism any
13 rationales that defendants may provide here for yet another decision that would undermine the aims of
14 the decennial census. *Cf. New York*, 139 S. Ct. at 2575 (court is “not required to exhibit a naiveté from
15 which ordinary citizens are free” (quoting *United States v. Stanchich*, 550 F.2d 1294, 1300 (2d Cir.
16 1977)).

CONCLUSION

This Court should grant plaintiffs’ request for a stay or preliminary injunction.

Dated: New York, New York
August 31, 2020

Respectfully submitted,

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