

## MEMORANDUM

To: Ms. Sheleen Dumas, Department PRA Clearance Officer, Submitted via <http://www.regulations.gov>

From: David S. Johnson, National Academies of Sciences, Engineering and Medicine; and  
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Subject: U.S. Census Bureau request for OMB clearance for the collection of data concerning the Survey of Income and Program Participation (SIPP) (FR Doc. 2023–15442, OMB Control No. 0607-1000)

I urge the Census Bureau to reconsider its recommendation to reduce the SIPP sample size and identify adequate fiscal resources to preserve the future of this vital measure of household economic health and stability. SIPP is a critical benchmark of economic well-being in American households. As the Census Bureau noted in its congressional budget justification for Fiscal Year 2024, “SIPP is crucial to the measurement of the effectiveness of existing federal, state and local programs. The data are used to estimate eligibility, use, future costs, and coverage for government programs such as food stamps, and to provide improved statistics on the distribution of income in the country.”

Even the National Academies of Sciences, in their consensus panel report in 2009, *Re-engineering the Survey of Income and Program Participation*, stated: “The Survey of Income and Program Participation is a unique source of information for a representative sample of household members on the intra-year dynamics of income, employment, and program eligibility and participation, together with related demographic and socioeconomic characteristics. This information remains as vital today for evaluating and improving government programs addressed to social and economic needs of the U.S. population as it did when the survey began 25 years ago.”

The longitudinal data SIPP provides are essential to understanding how life’s situations are interconnected and affect economic stability. Census Director Robert Santos, in remarks at the SIPP Virtual User’s Conference in April 2023, stated his support for the importance of SIPP:

“You need to look at the trajectories over time of the situations people in need find themselves how they attempted to navigate them, and the extent to which problems were mitigated. You need to be able to see that problems are not siloed: Life’s situations are necessarily interconnected. Unemployment is associated with education, which is associated with hunger, and health, and housing, and safety net eligibility, and so on. So, we not only need to see trajectories over time but also the interconnectivity of all the things that allow us to live a life. And guess what: SIPP provides the longitudinal data that can help us understand people’s and families’ trajectories, as well as the interconnectivity of various life aspects, which we call policy areas.”

The Census Bureau’s proposal to implement a permanent 34 percent cut to the survey’s sample size raises serious concerns. Such a cut would likely reduce data quality, and coupled with the

steep decline in the SIPP response rate — from 68 percent for the 2017 panel to just 37 percent in 2022 — could increase nonresponse bias. Moreover, making permanent a reduction of 18,000 households — from 53,000 housing units to just 35,000 — would decrease the reliability and usefulness of SIPP data, especially by reducing the ability to distinguish between demographic or geographic subgroups. As stated in the 2022 SIPP User guide, “The 2022 SIPP sampled about 55,000 designated Housing Units (HUs) from 686 sample areas designed to represent the civilian, noninstitutionalized population of the U.S. This yielded 47,500 eligible HUs. Of the eligible HUs, approximately 17,500 households were interviewed between February and May 2022...” This suggests that reducing the targeted sample to only 35,000, will result in much fewer completed household interviews due to the already high non-response. Hence, the impact will be even larger than the suggested reduction of 18,000 household units.

Again, the Census 2024 Congressional Budget (and the 2023 budget) maintained the importance of the 53,000 sample: “The overlapping panel design provided for continuing annual ‘combined’ sample sizes that totaled the same 53,000 households for each calendar year.” This target was established years ago in re-allocating the Survey of Program Dynamics to ensure a larger sample size for key estimates by State and demographic groups. As stated in the Census 2021 Congressional Budget, “The FY 2021 funding for SPD supplements the SIPP program in providing a source of detailed socioeconomic data from a national sample of households, with a focus on the low-income population, which is more likely to receive benefits or assistance from welfare programs.” It continues to state that the “...success of the SPD funding contributes to the ability of the SIPP program to provide reliable estimates for the poverty population.” And that this combined funding will “...allow the SIPP program to supplement the sample for the 2018 SIPP panel...” It is my hope that the Census Bureau will continue to support the goals of the combined SPD and SIPP funding and ensure sufficient sample size.

The impact of these sample cuts will only exacerbate already insufficient coverage, as illustrated by a recent SIPP User Note from June 26, 2023, “2022 SIPP: Insufficient Geographic Coverage and Unit Nonresponse” (<https://www.census.gov/programs-surveys/sipp/tech-documentation/user-notes/2022-usernotes/2022-insuff-geog-cov-unit-nonresp.html>) The document states: “However, the magnitude of the increase in (and differential nature of) nonresponse during 2022 data collection likely reduces their efficacy. As a result, data users should use caution when creating estimates using 2022 SIPP data, including the longitudinal 2020 and 2021 Panel subsamples.” This suggests that another sample reduction will have even more severe impacts on the ability to estimate key statistics by demographic groups and use the SIPP to evaluate geographic differences in State policies.

As the former Division Chief of the Social, Economic and Housing Statistics Division at the Census Bureau, where I led the SIPP reengineering efforts in 2006-2009, I completely understand the funding situation, increased collection costs, and constraints within the Census Bureau. During my tenure at Census, we worked with stakeholders to convince the Department of Commerce and the Administration to fully fund SIPP, even though severe cuts were proposed. The “Save the SIPP” efforts of key stakeholders convinced 71 Congressional Representatives and Senators (including Nancy Pelosi and Charles Schumer) to sign a letter of support for SIPP to the President in March 2006. These efforts led to increased funding for SIPP.

I hope that the Census Bureau recalls these efforts and the importance of SIPP for research and policy, and, as a result, recognizes that SIPP is too valuable to sacrifice with this the sample size reduction. Therefore, I urge the Census Bureau to reconsider the reduction in the SIPP sample size and to take steps to secure the future of this crucial measure of economic well-being and source of information to guide policy decisions affecting vital economic support programs.

Thank you for your consideration.

Sincerely,

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