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March 1, 2021

Sheleen Dumas  
Department PRA Clearance Officer  
Office of the Chief Information Officer  
U.S. Department of Commerce

**Submitted via *reginfo.gov***

RE: Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; Household Pulse Survey (OMB No. 0607-1013)

Dear Sheleen Dumas,

The National Women's Law Center (the "Center") appreciates the opportunity to comment on the Federal Register Notice (FRN) regarding potential changes to the Census Household Pulse Survey (the "Survey") to put into place around March 1, 2021. The Center submits this comment in favor of continuing to collect data about income loss, housing instability, food insecurity, unemployment assistance, economic impact payments, and health care. The Center also proposes updating questions to better capture gender and racial impacts of the pandemic and economic conditions.

The Center fights for gender justice — in the courts, in public policy, and in society — working across the issues that are central to the lives of women and girls. The Center uses the law in all its forms to change culture and drive solutions to the gender inequity that shapes society and to break down the barriers that harm everyone — especially those who face multiple forms of discrimination. For more than 45 years, the Center has been on the leading edge of every major legal and policy victory for women.

The Center has continuously advocated to expand opportunities for women and girls, with particular emphasis on women with low incomes and those who face multiple and intersecting forms of discrimination. Census data has been, and continues to be, pivotal to the Center's advocacy. The Center relies on census data to identify the needs of women and their families, to highlight the various policy implications of legislation, fight back against unfair practices and policies, illuminate the different ways women and girls experience life in the United States, and develop evidence-based solutions for health, education, workplace, and income security policy.

In the February 1, 2021 Federal Register notice, the Census Bureau noted an intention to revise the Survey, including removing some questions so that the public burden would not increase. The notice did not specify which questions it would remove because

“utility has declined over time.” The Survey has been useful to the Center and other stakeholders, providing us with data about the impact of the COVID-19 pandemic and related economic fallout on different demographic groups in real time rather than waiting until annual poverty or other data is released. This has helped the Center’s advocacy on health and economic responses to COVID-19, including food and housing assistance, expanded unemployment assistance, cash assistance, and other income supports, as well as health and education responses. Consequently, the Center urges the Census to maintain the loss of employment income questions (Questions 9-11 and 13 in the Phase 3 questionnaire), Unemployment Insurance and Economic Impact Payment questions, difficulty in paying for household expenses, food security questions (Questions 24-27), and housing security questions (Questions 39-41). The health and education questions could be modified to increase their utility.

The Center urges the Census Bureau to maintain the current wording of the housing security questions to provide the ability to track results since the introduction of this wording in Phase 2 of the Survey. The Center would be open to the Census Bureau evaluating whether to move the housing security questions before the health questions, as a number of organizations have noted a drop-off in response rates for later questions like the housing security set.

In addition, the Center suggests the following to enhance the quality and utility of this Survey:

- **Improve demographic questions to track the impacts of COVID-19 on LGBTQ+ people.** The current Survey does not include measures of sexual orientation and gender identity, making it impossible to track COVID-19’s impact on LGBTQ+ people using federal data. Revisions to the Survey should include providing an option for nonbinary people to select in Question 2, instead of just the male and female response options, as well as sexual orientation and gender identity measures.<sup>1</sup>
- **If feasible, publish microdata files sooner.** The Center uses the microdata files to analyze crosstabs for gender and race, gender and households with children vs. those without children. These files are generally released two weeks after the Survey’s data tables, with some file releases coming even later. Decreasing the length of time between publishing the tables and the microdata files would improve ability to produce materials about how women of color and women of color with children are faring. This would consequently improve our advocacy for policy changes to improve their health and economic security.
- **Improve demographic collection about families with children.** The current Survey asks about the number of children living in a respondent’s household. It would be helpful to know if the children are one’s own versus just in the household. This would permit us to analyze the impact on mothers in particular, instead of women with children in the household. Providing a definition of “household” would also increase the utility of the Survey. One of our staff members took the Survey in January and interpreted household based on the tax

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<sup>1</sup> For more information on the importance of collecting data on the impact of LGBTQ+ people, see comments from The Williams Inst., UCLA School of Law and the Center for American Progress.

definition of a household, thus excluding her roommate who is of no relation, rather than providing the number of people living in the unit (e.g., the question on the 2020 Census questionnaire). In a similar vein, some survey respondents may respond to the current question about children to only include their own children, while other survey respondents may include any children in the housing unit—a potentially increasing phenomenon as economically insecure families double up in one housing unit. In addition, the Center urges the Census Bureau to edit the question asking about the number of children living in a respondent’s household to ask how many children in the household are under five, how many are five to 12, and how many are 13 to 17. The needs of children vary drastically by age, which has consequences for families’ finances as well as school systems and plays a large role in education and child care decision making by families and school administrators. This adjustment would give the Center and other stakeholders insight into families’ needs for full-time child care and part-time child care and whether education programs are working well for elementary and secondary students.

- **Improve the health insurance coverage question.** Question 36 in the current Survey provides users eight response options, and some survey respondents are covered under multiple types of insurance. This poses problems in the Center’s ability to analyze women who are and are not covered. The Center would have greater utility if the Survey asked, “Are you currently covered by any health insurance or health coverage plans?” with yes or no as the only response options. If stakeholders find utility in the responses about type of insurance/health coverage, then there could be a follow-up question for survey respondents who answer yes to check boxes for the type of coverage they have.
- **Add questions about the decisions families are making around child care.** The Notice states that the Census Bureau is considering adding at least one child care question but does not provide details on its recommendation. The Center recommends these two questions: “What kind of child care services are being utilized by members of the household? What would be your preferred setting for children in the household?” Many women and families with young children face difficult choices about whether to send their children to child care settings. During the pandemic, child care centers have been experiencing many of the same operational challenges as schools (e.g., smaller class sizes, requiring physical distancing, needing additional supplies to reduce sharing among children, etc.). However, financing and oversight for child care centers is far different from schools, so policy solutions aiming to protect children attending schools are more difficult to extend to younger children in child care settings. In addition, parents of school-aged children may need more hours of child care if schools offer reduced hours of in-person instruction, perhaps needing three days a week, or only afternoons. In many cases, existing programs are not currently designed to offer these hours. The first proposed question could be multiple-choice with response options such as child care centers/preschool, before/after care, paid child care in someone else’s home, paid or no-cost care by friends and family, parental/guardian care at home, taking the child to work, or child left unattended at home. The second proposed question could utilize the same multiple-choice response options for efficiency, but stakeholders would receive more useful information to develop targeted solutions from a more probing

question asking what their preferred child care setting would be, and if it's different than the one they are using, whether they have been unable to find such a program, unable to afford it, or the hours do not match their needs, and if they have changed their arrangement as a result of COVID-19.

- **Add similar questions for care of adult disabled dependents and/or older family members.** The Notice states that the Census Bureau is considering at least one new question related to disability but does not specify what the question would be. COVID-19 has also posed challenges for caregiving of disabled adult dependents and caregiving for older family members. The availability of in-home caregivers, adult day programs, and other forms of care has shifted for many families. Consequently, the Center recommends the revised Survey include questions regarding care for disabled adult dependents or older family members.

Finally, the information collection for the Survey is approved through October 30, 2023. The Center recommends that the Census Bureau continue to provide opportunities for stakeholders to suggest improvements to the Survey and that those Notices provide more details on Census Bureau suggested changes and with more lead time before proposed revisions take effect.

Thank you for the opportunity to submit these comments on this important information collection. If you have questions, please contact Jasmine Tucker at [jtucker@nwlc.org](mailto:jtucker@nwlc.org) and/or Sarah Hassmer at [shassmer@nwlc.org](mailto:shassmer@nwlc.org).

Sincerely,



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