



April 11, 2021

## American Community Survey Methods Panel Test

Dear American Community Survey Official

The Partnership for America's Children mission is to support its network of state and community multi-issue child advocacy organizations in effective advocacy. The Partnership has 52 member organizations in 41 states that advocate to improve policies for children at the state, local and federal level. Collectively they represent over 90% of the nation's children. The Partnership connects its members to peer expertise and national resources and facilitates interstate collaborations to deepen the level of impact of child advocacy within and across states. It fosters policy expertise, advocacy skills, and strong organizations.

Partnership members use Census data in their advocacy, and thirty Partnership members are also KIDS COUNT grantees in their state, serving as that state's data hub on children for policy makers, administrators, and nonprofits.

The Partnership served as the national hub on the undercount of young children in the 2020 Decennial Census. It helped lead the Count All Kids Committee that worked to engage the children's advocacy and service community in improving the count of young children.

I am writing in response to the Federal Register Notice 86 FR 8756 (Docket Number USBC-2021-0002) regarding the American Community Survey Methods Panel test. I am writing because several aspects of the methods panel test are likely to have an impact on the accuracy of data on young children.

It is important to remember that the net undercount of young children in the 2010 Census was nearly 5 percent which is much higher than any other age group. Also, there is solid evidence produced by Census Bureau researchers that young children are underreported at a high rate in the American Community Survey (ACS). In the Census and the ACS young minority children are underreported at a much higher rate than Non-Hispanic White children. This evidence makes coverage of young children a high priority in methods panel testing.

Both Census Bureau research and research we conducted as part of the Count All Kids campaign for the 2020 Decennial Census indicated that a significant proportion of young children were missed because the adult filling out the Census form did not include them on it.

For young children, therefore, perhaps the most important aspect of the proposed work in the ACS Methods Panel Test is on household rosters. There are two studies the Census Bureau should undertake in this regard. First, the Census Bureau should conduct a survey of parents with young children in the household to ask them if they understand young children are supposed to be included in the ACS survey roster. Several surveys found that many parents are not aware that young children are supposed to be included in the 2020 Census (O'Hare 2019). The Count All Kids initiative conducted such a survey in 2019 and found that 10 percent of the survey respondents were not planning to include their young child in the 2020 Census and another 8 percent were not sure if they would include their young child in the 2020 Census (Griffin and O'Hare 2020). Focus group research showed that many parents report that they did not see any reason why young children should be included on the 2020 Census questionnaire. One common explanation for excluding young children was the belief that the government did not need to know about them since they weren't as yet in school. The Count All Kids survey showed that minority parents were more likely than Non-Hispanic Whites parents to say they were not planning to include or were unsure they would include their child in the 2020 Census. It makes sense that many of these beliefs would carry over to a survey like the ACS.

The second study the Census Bureau should undertake on this topic is a test of new language in the ACS paper questionnaire and the online version to remind parents or householders to include young children in the ACS. It is important to couch this reminder about "young children" using terms like infants, newborns, toddlers, and preschoolers. Focus group testing found that the term "young children" did not always equate to infants and toddlers. This is also related to another part of the methods panel test that plans to examine the impact of "using plain language to improve communication." Testing revised rostering instructions with this language makes sense, but it may also be worth testing a separate question that asks if any children ages 0 to 4 live or stay at this address. This more direct approach might be more effective than simply clarifying instructions.

Another part of the Federal Register Notice discussed the idea of not collecting detailed data for Person 5. We note that the ACS roster is generally completed from oldest to youngest person in the household. So, the move to collect less data on Person 5 is likely to have more of an impact on the completeness of data for young children than for adults.

The test of an adaptive survey design for non-response followup might help improve the count of young children in the ACS. Young children typically reside in households with young adult parents and young adults have lower self-response rates. Improving the

self-response rates for young parents would improve the count of young children, especially if rostering changes are made.

Thank you for the opportunity to provide these comments. Please feel free to address any questions to me at [dstein@foramericaschildren.org](mailto:dstein@foramericaschildren.org)

Sincerely,

Deborah Stein

#### References

Griffin, D., and O'Hare, W.P. (2020). "Are Census Omissions of Young Children Due to Respondent Misconceptions about the Census?" International Journal of Social Science Studies, Vol 8. No. 6, November pp 59-72.

<http://redfame.com/journal/index.php/ijsss/article/view/4994/5223>

O'Hare, W.P. (2019). "Evidence mounts regarding respondent confusion about counting young children in the Census" *The Census Project*

<https://thecensusproject.org/2019/12/11/evidence-mounts-regarding-respondent-confusion-about-counting-young-children-in-the-census/>