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May 18, 2022

Ms. Sheleen Dumas
Department PRA Clearance Officer
Office of Chief Information Officer
Commerce Department
Washington, DC 20230

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, Docket No. 2022-08262)

I am writing from First Focus on Children in response to the request for comment on the Federal Register Notice regarding proposed changes to the U.S. Census Bureau Household Pulse Survey.

First Focus on Children is a bipartisan child advocacy organization dedicated to making children and families the priority in federal policy and budget decisions. As advocates for children, we are committed to ensuring that all children have an equal chance for success. We know that access to frequent and timely data is critical to achieving this goal by informing decision-making on policies and programs that serve and support children and their families.

Throughout the COVID-19 pandemic, the Census Household Pulse survey has been critical to understanding the repercussions of this public health crisis on child health and economic stability, including the impact of relief measures included in the American Rescue Plan Act and other legislation passed by Congress.

We thank you for your thoughtful undertaking of the revision of this survey in Phase 3.5 to account for changes in the way that COVID-19 is impacting households with children, and appreciate the opportunity to comment to the proposed changes for this next phase.

We first want to uplift an [e-Dear Colleague letter](#) led by Representatives Sara Jacobs, Suzan DelBene, and Pramila Jayapal and signed by 47 members of Congress which requests an increase above the Fiscal Year 2022 enacted funding level for the Census Bureau's High Frequency Data Program to support the Bureau in creating more frequent and timely measures of poverty and material hardship, including measures focused on child poverty and wellbeing.

This letter stresses the need for long-term access to frequent and timely data:

“Beyond the pandemic, sustaining regular and timely measures of material hardship that include a focus on children and families will continue to be important to understand the state of child wellbeing and the multidimensional impacts of the policies we enact. This includes questions about housing and food insecurity, access to childcare and transportation, and ability to pay household expenses, as well as questions that provide insights into families’ savings and debt and ability to afford educational and extracurricular activities for children.”

First Focus on Children, through the work of our affiliate organization First Focus Campaign for Children, supports this request for increased funding targeted to continuing the Household Pulse Survey and including questions that provide additional detail as to how households with children, especially households of color, continue to disproportionately experience material hardship and income volatility.

In addition, in response to specific changes to the survey proposed for Phase 3.5 we offer the following comments below:

Children’s Preventive Care and Mental Health

We support the addition of questions about the age of children receiving COVID-19 vaccines to include 0-5-year-olds. Children in this age group are not yet eligible for vaccines, but, if they become eligible, it will be important to understand how many of them are vaccinated and the reasons for those decisions. Childhood vaccination rates against COVID-19 remain concerningly low and varied, with state-specific rates ranging from [15 percent to 66 percent for first doses](#). Vaccinating children under the age of five will likely present even greater challenges in distribution and vaccination rates, and we must understand the data behind families’ decisions to best reach children. We believe the survey should also include children in its questions around contracting COVID-19 and the type and length of symptoms. Children can have different COVID-19 experiences than adults and it is important to capture their experiences as well.

We are concerned about the removal of the preventive question regarding children’s check-ups, and we believe this question should be maintained. The rates of routine childhood vaccinations have declined concerningly during the COVID-19 pandemic, and missing well-child visits is one cause for those declines. It would be useful to have data on these missed appointments.

We support and are appreciative of the inclusion of a question about children’s mental health, which has suffered greatly during the pandemic. We recommend including a follow up question about the ability of children and families to the timely access of mental health services through a variety of providers (schools, counselor, psychiatrist, peer support, and others.)

Child Care (in Employment section)

We recommend including a child having contracted COVID-19 in the list of reasons a child was unable to attend child care in question EMP7. It is important to capture the impact COVID-19 is having on children, and the physical impact is one component.

In order to understand the disproportionate on women a lack of access to child care has had, we recommend that EMP8 be changed to make clear *which* adult in the household took the actions specified and therefore was most impacted. We also support consistent reporting of responses to these questions across both the Data Tables and Public Use Files (PUFs). The PUF provides results

for survey respondents who cannot access child care for children under age 12, whereas the Data Table provides results for survey respondents with children under age 5. Providing both sets of data in both the Data Table and PUF would provide the ability to compare results for the two data groups, as child care may be harder to access for young children.

Housing

We appreciate the addition of questions regarding the amount of currently monthly household rent and any changes to this rent in the last 12 months, which are helpful to depicting that monthly rents are increasing in many parts of the country. However, we are disappointed to see the removal of questions on confidence to pay next month's rent, which also provide helpful insight into changes in rent as well as monthly household income volatility.

Thank you for the opportunity to submit a comment. Please do not hesitate to contact Cara Baldari at carab@firstfocus.org or Averil Pakulis at averip@firstfocus.org for additional information.

Sincerely,

A handwritten signature in blue ink that reads "Bruce Lesley". The signature is written in a cursive, flowing style.

Bruce Lesley, President
First Focus on Children