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Department PRA Clearance Officer
Office of the Chief Information Officer
U.S. Census Bureau, Commerce Department
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RE: Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; Household Pulse Survey, OMB Control Number 0607-1013.

The National Low Income Housing Coalition (NLIHC) is dedicated to achieving racially and socially equitable public policy that ensures people with the lowest incomes have quality homes that are accessible and affordable in communities of their choice. Our members include state and local housing coalitions, residents of public and assisted housing, nonprofit housing providers, homeless service providers, fair housing organizations, researchers, public housing agencies, private developers and property owners, local and state government agencies, faith-based organizations, and concerned citizens. While our members include the spectrum of housing interests, we do not represent any segment of the housing industry. Rather, we focus on housing policy and funding improvements for extremely low-income people who receive and those who need assistance.

NLIHC leads the Disaster Housing Recovery Coalition (DHRC) of more than 890 national, state, and local organizations, including many working directly with disaster-impacted communities and with first-hand experience recovering after disasters. The DHRC works to ensure that federal disaster recovery efforts reach all the lowest-income and most marginalized survivors.

NLIHC also convenes the Housing Recovery Research Consortium, consisting of researchers from academia, research centers, and non-profit housing organizations who come together to improve access to high-quality data, identify research questions relevant to effective and equitable disaster response and recovery, and disseminate research and best practices as it relates to housing for vulnerable populations.

NLIHC applauds the Census Bureau for including questions about the impact of disasters on people and their families in the new phase of the Census' Household Pulse Survey. The survey was designed to quickly collect household experiences during the coronavirus pandemic, making it an ideal tool to understand the impact of climate-related disasters. According to the National Oceanic and Atmospheric Administration (NOAA), 57 disasters including hurricanes, wildfires, draughts, and other severe weather events have each caused more than \$1 billion in damages in the U.S. since 2020. Six of those have resulted in more than \$10 billion in damages. Yet, the U.S. lacks a standardized data collection tool that captures the material impact of these disasters on the population's housing, health, and well-being across the country. The questions added to the Household Pulse Survey capture the impact of these events regarding displacement

and immediate access to food, water, and sanitary living conditions. However, we encourage the Census Bureau to adjust these questions and include a few additional ones.

The Census Bureau should add a question about whether households applied for emergency assistance from a federal, state, or local agency after a disaster and a question about what assistance they received. Like the Pulse survey's existing question about emergency rental assistance, a question about emergency disaster-related assistance would inform the public and government agencies which impacted households are able to apply for and access assistance during a crisis. In the case of disasters, assistance may be in the form of temporary shelter, as well as financial assistance. Without such data, external parties are unable to assess whether government agencies equitably distribute assistance across race, ethnicity, income, disability status, and housing tenure.

Renters, and particularly low-income renters, are more vulnerable to disasters than homeowners, given their lower income, limited wealth, life stage, and residential location.¹ Yet renters typically have more limited access to disaster assistance² because they cannot receive assistance for damage to their housing which they do not own. This results in disparate access to assistance given applicants of color – who are more likely than white applicants to be renters. The Census Bureau's 2019 American Community Survey indicates that 59% of Black non-Latino households, 54% of Latino households, 49% of AIAN households, and 40% of Asian households are renters, compared to just 28% of white non-Latino households.

Even among homeowners, research indicates that the distribution of FEMA Individual Assistance (IA) is not racially equitable. An analysis of FEMA assistance between 2005 and 2016 found that homeowners in ZIP codes with more Black residents were less likely to receive a FEMA inspection and more likely to be denied assistance than homeowners in white neighborhoods. When homeowners did receive assistance, those in Black neighborhoods received 5 to 10 percent less, on average, than those in white neighborhoods.³ Similar research also found that applicants from non-white and poorer blocks were less likely to receive assistance.⁴ This research, out of necessity, has not looked directly at the race of applicants for FEMA assistance, but instead has examined the distribution of assistance by the race and ethnicity of applicants' ZIP codes or neighborhoods, because FEMA has not up to this point asked applicants for their race or ethnicity. Adding a question regarding emergency assistance acceptance and approval would allow for a more valid analysis of the distribution of disaster assistance by race and ethnicity than is currently possible.

The Census Bureau should add a question about the type of shelter that displaced households occupy in the immediate aftermath of a disaster. Responses to this question would indicate the extent to which disaster response

¹ Lee, J. and Van Zandt, S. (2018). Housing Tenure and Social Vulnerability to Disasters: A Review of the Evidence. *Journal of Planning Literature*, 34(2): 156-170.

² Wilson, B., Tate, E., Emrich, C. (2021). Flood Recovery Outcomes and Disaster Assistance Barriers for Vulnerable Populations. *Frontiers in Water* 3: 752307.

³ Flavelle, C. (2021). [Why Does Disaster Aid Often Favor White People?](#) *New York Times*, Oct. 27, 2021.

⁴ Billings, S., Gallagher, E., and Lowell, R. (2022). Let the Rich Be Flooded: The Distribution of Financial Aid and Distress after Hurricane Harvey. *Journal of Financial Economics*, In press.

systems work to provide adequate shelter. Potential responses to the question should include a different home, double-up with family or friends, hotel/motel, temporary shelter, a place not intended for sleeping like car or park. Disasters can destroy homes, contributing to a rise in the number of people experiencing homelessness if adequate assistance and alternative housing options are not available. Houston, for example, saw a 15% increase in homelessness after Hurricane Harvey in 2017.⁵ The accessibility of assistance is a large factor in determining the outcome for disaster-impacted households. Responses on the variations of displacement seen can provide a clearer picture of deficiencies and successes in disaster response.

The Census Bureau should structure the disaster-related questions to ensure that the Bureau obtains information about adequate food, water, electricity, and living conditions from all households impacted by disasters, regardless of their displacement. The sequence of questions ND1, ND2, and the additional ND questions will not capture the experiences for all people impacted by disasters in the past year. While displacement is a common result of a disaster, it is only one in a range of results that could occur. For instance, many individuals choose to remain in severely damaged homes following disasters. While these individuals are not “displaced” certainly have their living condition severely impacted by a disaster. Rather than ask specifically about displacement in the first disaster-related question, the Census Bureau should ask a general question about whether the respondent has been impacted by a disaster in the past year. If so, follow-up questions should ask about displacement and the other potential outcomes. This would allow for a broader range of impacts to be seen and a clearer picture of how households deal with them.

The Census Bureau should consider modifications to its sampling methodology to target geographic areas impacted by smaller-scale disasters for at least one year after they occur. The frequency and severity of climate-related disasters are increasing. Yet, few tools exist to understand the immediate impact of such events. At the same time, the Household Pulse Survey was developed specifically to quickly capture the economic and social impact of the pandemic, a president-declared nationwide disaster. The survey has been instrumental to understanding, in real-time, the pandemic’s impact. Given its small sample size, however, the national survey is severely limited in its ability to capture impacts at the local or regional level; the scales at which most disasters occur. We encourage the Census Bureau to consider ways in which the Household Pulse Survey’s sampling methodology could be modified for use in other disasters that are not national in scale. The Bureau should also add a question about the location of the respondent when they were impacted, assuming displaced respondents may provide a current address to the Census Bureau that is outside of the impacted areas.

We applaud the Census Bureau for its continual improvements to the Household Pulse Survey. If you have any questions or need additional information, please contact NLIHC Vice President for Research Andrew Aurand (aaurand@nlihc.org).

Sincerely,

Diane Yentel

⁵ Villarreal, C. [Hurricane Harvey: Five Years Later](#). Coalition for the Homeless, Aug. 26, 2022.