



The Partnership for America's Children (PAC) submits these comments in response to the Census Bureau's Comment Request; American Community Survey and Puerto Rico Community Survey.

The Partnership's mission is to support its network of state and community multi-issue child advocacy organizations in effective advocacy. The Partnership has 50 member organizations in 40 states that advocate to improve policies for children at the state, local, and federal levels. Collectively, they represent over 90% of the nation's children. 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 policymakers, administrators, and nonprofits.

The Partnership for America's Children served as the national hub on the undercount of young children in the 2020 Decennial Census. In this role, the Partnership formed and continues to co-lead a national working group of child-serving organizations that is working to improve the count of young children in all Census Bureau demographic products.

The Bureau requested comments on whether the proposed information will have practical utility and to evaluate ways to enhance the quality, utility, and clarity of the information to be collected. We are delighted to take this opportunity to address the importance of ACS data for children and to identify concerns about the collection and reporting of the data.

1. American Community Survey data is very important for children and for state and local child advocacy efforts.

The Partnership submits these comments to document the importance of the American Community Survey (ACS) to children and to the work of child advocates, and to provide insight into the implications of using administrative data to collect ACS information.

First, the Partnership is very concerned about the quality of ACS data because it is often used to allocate federal funding for children's programs. For programs funded through appropriations that use ACS data to allocate federal funding to states or communities, accurate data are essential to ensure that federal funds are spent as Congress determined and are spent on the communities with the greatest need, where federal funds make the most difference.

Second, PAC members, composed of child advocacy organizations that work at the state and local level, depend heavily on American Community Survey data to educate state and local policymakers and support a wide range of child-serving organizations. KIDS COUNT grantees, which collect and report data on children in their states, also depend on ACS data. There are KIDS COUNT grantees in every state including DC and in several territories. About 30 Partnership members are also KIDS COUNT grantees.

Because the ACS is a rich survey, it allows child advocates to use the data in a wide variety of issues. However, the single most important data element of the ACS for child advocates is undoubtedly the ability to use its data to measure child poverty (and related economic information such as children in

deep poverty, or low-income children under 200% of poverty) at the state and local level. This is particularly important for state and local policymaking because it is available for relatively small political units and provides trends over time.

The Partnership conducted a survey of what ACS data its members and KIDS COUNT grantees used in the fall of 2021, and Dr. William O'Hare produced an analysis of that survey.

<https://countallkids.org/resources/use-of-the-american-community-survey-data-by-state-child-advocacy-organizations/>

While the responses were varied, making it hard to provide any quantitative exploration of how groups used them, there are some important qualitative results. They show:

- Child advocates use ACS data to analyze child well-being in their state, to inform policymakers, and to support the work of other organizations. (We know from other sources that direct service organizations use this data to assess needs and apply for grants, among other purposes.)
 - The ability to use data that addresses substate geographies is critical to their work. It allows them to assess differences in child well-being by geography across the state and also to educate local policymakers and communities.
 - One important use of ACS data is to provide the total population of children, or of a particular age group of children, to serve as the denominator when advocates are assessing what proportion of children have access to or have used a government program, when the numerator is drawn from administrative data. For example, they can use it to document what proportion of the state's children have received WIC, or preschool, or subsidized child care, or health insurance. This helps them document the need for expansions of programs or increased outreach or better management of programs. So the ACS data is important both on its own, and also to provide context for other kinds of data.
 - There are four very important qualities of the ACS for their work.
 - The ACS provides data on a host of topics related to child well-being including poverty, health, and education. While the ACS data are used for a large number of well-being measures, analysis shows child poverty is the most widely used measure of child well-being among state child advocates using ACS data.
 - The ACS provides comparable and consistent measures for a wide variety of substate geographic areas. For the vast majority of states, state-wide averages mask big differences within the state so it is important to be able to examine child well-being differences within the state.
 - The ACS produced data that is consistent over time which allows advocates to track trends. In terms of tracking public policies or general conditions, tracking trends is important in order to find out if the situation for children is improving or deteriorating. For example, advocates can use ACS data to determine if a state or local policy has increased or reduced child poverty, or other indicators such as teen pregnancy, and can then educate policymakers about the results.
 - For most states, the ACS sample is large enough to produce reliable estimates by race and Hispanic origin. This allows researchers and advocates to address questions of racial equity by disaggregating data.
2. There are three concerns that the Bureau should assess about the quality of the ACS data: The undercount of young children, the threat that differential privacy could create for ACS data if it breaks the relationship between the child and the adult in the data, and particular uses of administrative data.

First, the ACS undercounts young children, as do other Census products. In addition to the undercount of young children in the decennial census, which sadly seems to have gotten even worse in the 2020 Census, compared to the 2010 Census. Also, Census Bureau research shows young children are missed at high rates in the ACS, the CPS, and SIPP. <https://2hj858.a2cdn1.secureserver.net/wp-content/uploads/2021/04/The-Pervasive-Nature-of-Young-Child-Under-4-23-2021-Ds-1.pdf>, see page 3. They also tend to be missed in other countries. Because this problem is so endemic it is particularly important for the Bureau to address it in the ACS; solutions that improve the count of young children here may help the Bureau improve the count in its other products, as well.

The undercount of young children in the ACS means that communities and children with the greatest need receive less than their appropriate share of federal funding and it means advocates have less accurate data for their efforts to track child well-being and educate communities, partner organizations, policy makers, and funders.

We therefore urge the Bureau to dedicate research and operations capacity to improving the count of young children in the ACS. We have made a number of recommendations for improving the count of young children on other occasions, and we summarize them here:

- Prioritize making sure that everyone in the household is counted, as well as reaching all the chosen households. Bureau research shows that many children are left off census forms even when families respond. The Bureau needs to increase its efforts to make sure that everyone in the household, particularly young children, are included in responses.
- Dedicate more resources to research on why young children are missed, with particular attention to children of color since they are missed at greater rates
- Conduct communications research with families with young children to determine why they leave their children off and what would persuade them count their children
- Use research the Bureau has already conducted that identify factors contributing to this undercount to modify operations to reduce the impact of these factors
- Partner with stakeholders to get their insight and recommendations on how to improve the count of young children.

Second, the implementation of formal privacy to the ACS threatens the accuracy of child data. Dr. William O'Hare's analysis of the Bureau's demonstration products for the application of differential privacy to decennial census data showed that the use of the top down algorithm produced wildly improbable results. For example, before the application of differential privacy there were 82 blocks in the 2010 Census where there were children (population ages 0 to 17), but no adults (population age 18 and over). After DP was applied there were more than 160,000 such blocks. The problems are worst at the local level, and worse (percentage-wise) for Black and Hispanic children (because of the relatively smaller number of children of color in any given geography)

<https://countallkids.org/resources/analysis-of-census-bureaus-august-2022-differential-privacy-demonstration-product-implications-for-data-on-young-children/>

<https://countallkids.org/new-report-analysis-of-unified-school-districts-and-places-with-large-errors-for-the-population-ages-0-to-4-caused-by-application-of-differential-privacy/>

This level of error would make the ACS unusable for child advocates for most purposes, particularly for local data.

There is an even greater threat from the application of formal privacy or differential privacy to the ACS. The inaccuracies created by the application of differential privacy to the decennial census come from the top down algorithm, which breaks the data link between children and the adults in their household. That makes it impossible to measure child poverty at all.

The problem of delinking children and their parents in DP processing can be illustrated with how poverty is measured. Most children have no income of their own. Their access to economic resources depends on the income of the adults who care for them. Thus, the Bureau measures child poverty by looking at the income of the adults in the household. If the link between children and their adult caregivers is broken in data processing, there will be no way to measure whether they are poor, in deep poverty, low income, or have access to significant economic resources. This is not an issue with the decennial census because the decennial census does not include any questions about income or provide data on poverty. That makes the problem all the more significant for the ACS because the ACS is the best source for data on child poverty for state and local geographies.

Third, we both welcome and have concerns about the use of administrative data. Using administrative data as the only source risks missing many young children, particularly those who are very young (and thus not in tax records, for example) or live in “doubled up” households where the administrative records may only reflect some of the household members. We also note that each set of administrative data has its own definition of household units, and children that are included in one set of administrative records will not be in others. For example, SNAP households include everyone who purchases and prepare food together, regardless of family relationship. Tax records include only the taxpayer, their marital partner, and their dependents.

We recommend that administrative records be used as a back-up measure when households cannot be counted, or to complete information on who lives in the household, but they should not replace self-response. We know that self-response is generally the most accurate response, and we know that administrative records use a variety of different definitions of household members, so using administrative records instead of self-response could result in less accurate results.

We recommend that the Bureau research the option of using administrative records to identify young children missing from ACS responses (as well as other missing family members) and add them to the individual household responses collected during self-response. Since many young children are left off when adults self-respond, using administrative data to add children to individual ACS records could be a good way to improve the count of young children.

We recommend that the Bureau research the implications of using administrative data for counting people of color, since young children of color were missed at double the rate of white children in 2010. In particular, we ask the Bureau to research whether each source of administrative data is more or less likely to leave out people of color, and to identify multiple sources of data that get at all demographic groups.

We recommend that the Bureau research the following options for state administrative data.

1. In addition to SNAP, WIC, and TANF, which we understand the Bureau is already researching, we strongly recommend researching the possibility of using other sets of state records.
 - a. Medicaid records: Nearly half of all young children are on Medicaid when they are born so these records should be an excellent way to supplement self-responses that leave young children off.
 - b. Individual birth and death records.
 - c. School enrollment records.

- d. School meal records, and records of the Child and Adult Care food program that provides food for child care programs.

Thank you very much for the opportunity to submit these comments. Please direct any questions to jjones@foramericaschildren.org.