PUBLIC SUBMISSION

Docket: USBC-2022-0014
American Community Survey

Comment On: USBC-2022-0014-0001
American Community Survey 60 Day Federal Register Notice

Document: USBC-2022-0014-DRAFT-0008
Comment on FR Doc # 2022-19705

Submitter Information

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General Comment

The Coalition on Human Needs (CHN) submits these comments in response to the Census Bureau's Comment Request; American Community Survey and Puerto Rico Community Survey.
The Bureau requested comments on whether the proposed information will have practical utility. We are glad to take this opportunity to address the importance of ACS data for human needs services and advocacy and to identify concerns about the collection and reporting of the data.

Please see attached document for CHN's full comments.

Attachments

final ACS Comments CHN 11-14-22

November 14, 2022

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The Bureau requested comments on whether the proposed information will have practical utility. We are glad to take this opportunity to address the importance of ACS data for human needs services and advocacy and to identify concerns about the collection and reporting of the data.

American Community Survey data is very important for assessing how people are doing and whether governmental programs are meeting their needs.

First, the Coalition notes that the quality of ACS data is very important because it is often used to allocate federal funding for a wide range of programs and services for low income and other vulnerable populations. For programs funded through appropriations that use ACS data to allocate federal funding to states or communities, accurate data are essential to make sure 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, CHN and its member organizations rely heavily on American Community Survey data to assess the well-being of low income and vulnerable populations and the adequacy of programs intended to serve them. CHN's members include national-scope organizations representing human service providers, faith groups, policy experts, and labor, civil rights, and other advocates concerned with meeting the needs of low-income and vulnerable people. CHN's members, and the larger national community of advocates it serves, utilize ACS data related to poverty, income, health and disability, racial, ethnic, gender and age disparities, housing, education, work, access to/need for benefits, family composition, and many other demographic issues. CHN provides training for over one thousand advocates each year in the use of ACS and CPS data through an annual webinar with follow-up emailed materials. We show participants how to make use of ACS tables, data.census.gov advance search functions, and the statistical significance tool, and give special attention to how to get at substate data, how to find poverty by age and race by state and locality, and how to calculate the number and percentage of households spending half or more of their income on rent.

- Because the ACS is a rich survey, it allows human needs advocates to use the data in a wide variety of ways. Child advocates use ACS data to analyze child well-being in their state, to inform policy makers, and to support the work of other organizations. Advocates for people with disabilities, the aging, immigrants, women, and communities of color make similar use of the data, as do housing, health care and anti-hunger advocates. (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 advocates' and service providers' work. It allows them to assess differences in 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 a given demographic group, such as the aging, children, or of a particular age group of children, to serve as the denominator when advocates are assessing what proportion of the same group 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 access to 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 advocates' and service providers' work:
  - The ACS provides data on a host of topics related to 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 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 specific demographic groups 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 teen pregnancy, and can then educate policy makers 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.

Third, we both welcome and have concerns about the use of administrative data. In our collaborative work with the Partnership for America's Children, CHN has become aware of the benefits and drawbacks of administrative data to get accurate estimates of child populations. 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. The use of certain data sources may also be problematic for accurate estimates of other population groups including people of color. It would be very important for the Bureau to assess whether certain data sources would improve accuracy for some groups but not others and to use only where effective.

- Because self-response is generally the most accurate, 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 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: 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:
  - 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.
  - Individual birth and death records.
  - School enrollment records.
  - School meal records, and records of the Child and Adult Care food program that rovides food for child care programs.
- We appreciate the usefulness of updating language in the survey related to home heating and ride-sharing. CHN members are concerned about the increasing need for home energy assistance in light of rising prices, and the survey will benefit from the most accurate inclusion of home energy options.

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