

September 18, 2023



TO: Sheleen Dumas

FROM: Nancy Wemmerus, Research Director
Tom Godfrey, President
Stephen Tordella, Senior Research Fellow

SUBJECT: Decision Demographics concerns regarding U.S. Census Bureau request for OMB clearance for the collection of data concerning the Survey of Income and Program Participation (SIPP) (FR Doc. 2023–15442, OMB Control No. 0607-1000)

On behalf of Decision Demographics LLC, a nonpartisan research company specializing in demographic research and public policy evaluation, we appreciate the opportunity to provide comments in response to the Census Bureau’s request for review and approval of changes to the U.S. Census Bureau’s Survey of Income and Program Participation (SIPP), published in the Federal Register on July 20, 2023.

We urge the Census Bureau to reconsider the recommendation to reduce the SIPP sample size by a third. We urge the Bureau to instead identify adequate fiscal resources to preserve the future of this vital measure of household economic health and stability.

Originally formed in 1987 as the applied demography arm of the prestigious Population Reference Bureau, Decision Demographics conducts rigorous data analysis and research services supporting public policy evaluation. A certified small business, Decision Demographics has extensive experience working with internal and public access Census Bureau microdata products, including more than three decades of experience conducting quality assurance assessments of and research using SIPP data. We have conducted numerous SIPP-based studies for the USDA Food and Nutrition Service (FNS), often partnering with premier research organizations such as Mathematica, Urban Institute, Sabre Systems, and Abt Associates.

Decision Demographics is well equipped to speak on this important issue. We have served in myriad professional roles regarding federal survey data, and Decision Demographics staff are long-standing advocates on Capitol Hill for Census Bureau surveys, including invited Congressional testimony regarding SIPP-based research on SNAP participation. Our staff have served multiple terms as Chairpersons of the Applied Demography committees of the Population Association of America (PAA), Treasurer of the Council of Professional Associations on Federal Statistics (COPAFS), and invited members of the PAA Government and Public Affairs Committee, Committee on Population Statistics, and a Census Bureau Survey Costs Task Force.

We firmly believe that the re-engineered SIPP’s robust longitudinal design with an oversampling of low-income households uniquely positions the survey for rigorous analysis of program participation. SIPP is the primary source of data to better understand detailed patterns of SNAP participation and to analyze factors associated with SNAP participants’ decisions to enter or exit the program—information critical to SNAP policy formation. We used SIPP data to conduct FNS’s two most recent studies of SNAP Dynamics; our reports, which have been critical to SNAP

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policy decision-making, could only been conducted with SIPP data.^{1,2} Decision Demographics was invited by the House Committee on Agriculture’s Nutrition Subcommittee to testify before Congress about these SIPP-based findings; quality SIPP data were essential to the testimony we provided in this hearing.

SIPP is a critical benchmark of economic well-being in American households. As the Census Bureau noted in its congressional budget justification for Fiscal Year 2024, “SIPP is crucial to the measurement of the effectiveness of existing federal, state, and local programs. The data are used to estimate eligibility, use, future costs, and coverage for government programs such as food stamps, and to provide improved statistics on the distribution of income in the country.”

In addition to being “the best source for the information needed to determine eligibility for and receipt of transfers”, SIPP is the leading and often only federal source of survey data on key topics such as the interplay between household economics and marriage or divorce; what happens to family members who move away from one another; households’ cumulative material hardships such as food insecurity and inability to pay rent, mortgage, or utility bills; Americans’ economic experiences over periods of three or four years; month-to-month household income dynamics; and detailed family relationships within multi-family households.³

The Census Bureau’s proposal to implement a permanent 34 percent cut to the survey’s sample size raises serious concerns. Such a cut would likely reduce data quality, and coupled with the steep decline in the SIPP response rate could increase nonresponse bias. **Even with the post-2018 SIPP overlapping panel design, making permanent the 2023 reduction in SIPP’s sample size would noticeably decrease the reliability and usefulness of SIPP data, with a substantial impact on the survey’s ability to produce meaningful comparisons and to distinguish between demographic or geographic subgroups.**

Decision Demographics participates in continuing efforts to use SIPP data to analyze program participation and multiple benefit receipt. We are supporting Mathematica in their current development of a person-level SIPP-based microsimulation model of SNAP eligibility and participation. This model is critical to USDA FNS decision-making and modeling of costs and coverage under current and varying SNAP program rules. A permanent cut in the SIPP sample size could drastically jeopardize the efficacy of this model.

While we are painfully mindful of both falling survey response rates and fiscal constraints on all Census Bureau programs, SIPP is too valuable a measurement of household economic health and challenges to sacrifice with such a significant cut to the sample size, especially without an alternative source for comparable, reliable data. Therefore, we urge the Census Bureau to reconsider the reduction in the SIPP panel size. Instead, we urge the Bureau to take steps to secure

¹ Leftin, Joshua, Nancy Wemmerus, James Mabli, Thomas Godfrey, and Stephen Tordella, (2014). *Dynamics of SNAP Participation from 2008 to 2012*. Prepared by Decision Demographics for the U.S. Department of Agriculture, Food and Nutrition Service: Alexandria, VA. <http://www.fns.usda.gov/research-and-analysis>.

² Mabli, James, Thomas Godfrey, Nancy Wemmerus, Joshua Leftin, and Stephen Tordella (2014). *Determinants of SNAP Participation from 2008 to 2012*. Prepared by Decision Demographics for the U.S. Department of Agriculture, Food and Nutrition Service: Alexandria, VA. <http://www.fns.usda.gov/research-and-analysis>.

³ Bruce D. Meyer, Wallace K. C. Mok, and James X. Sullivan, “Household Surveys in Crisis,” *Journal of Economic Perspectives*, Volume 29, Number 4 (Fall 2015).

the future of this crucial measure of economic well-being and source of information to guide policy decisions affecting vital economic support programs.

Thank you for your consideration of our concerns and hopes for a sustained sample for the SIPP. Please direct any questions about these comments to Nancy Wemmerus, Research Director, Decision Demographics (NWemmerus@Decision-Demographics.com).