



COALITION ON HUMAN NEEDS

1825 K Street, NW · Suite 411 · Washington, DC 20006 · 202.223.2532 · Fax 202.223.2538 · www.chn.org

September 18, 2023

Ms. Sheleen Dumas
Department PRA Clearance Officer
Office of the Under Secretary for Economic Affairs
U.S. Department of Commerce
1401 Constitution Ave., NW Washington, DC 20230

Re: 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)

Dear Ms. Dumas:

On behalf of the Coalition on Human Needs (CHN), I appreciate this 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 (the "notice").

We urge the Census Bureau to reconsider its recommendation to reduce the SIPP sample size and urge the Bureau to instead identify adequate fiscal resources to preserve the future of this vital measure of household economic health and stability. We believe that SIPP plays an important role in understanding and addressing the dynamics of poverty in our country, and that it needs a significant sample size to enable us to understand the differences in experiences of poverty in our country by age, race, and ethnicity.

The Coalition on Human Needs (CHN) is an alliance of national organizations working together to promote public policies which address the needs of low-income and other vulnerable populations. The Coalition's members include civil rights, religious, labor, and professional organizations, service providers and those concerned with the well being of children, women, the elderly, and people with disabilities.

Our coalition views the collection of useful, objective data about our nation's people, housing, economy, and communities to be among the most pressing human needs issues of our day. SIPP is a critical benchmark of economic well-being in American households, because, as one of if not the most important of longitudinal studies, it is the major way in which we can track economic well being over time and understand the dynamics behind other data.

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 including extreme "\$2-a-day" poverty; and detailed family relationships within multi-family households.

Equally important, the longitudinal data SIPP provides are essential to understanding how life's situations are interconnected, cumulative, and affect economic stability. Census Director Robert Santos, in remarks at the SIPP Virtual User's Conference in April 2023, gave a more complete picture of SIPP's importance, based on his 40 years of distinguished research: "What patterns lead folks in need to overcome life's obstacles? Whether it's shelter, food, employment, or even the justice system. Well, to understand that, to gain real insight, you need ... longitudinal data. You need to look at the trajectories over time of the situations people in need find themselves how they attempted to navigate them, and the extent to which problems were mitigated. You need to be able to see that problems are not siloed: Life's situations are necessarily interconnected. Unemployment is associated with education, which is associated with hunger, and health, and housing, and safety net eligibility, and so on. So, we not only need to see trajectories over time but also the interconnectivity of all the things that allow us to live a life. And guess what: SIPP provides the longitudinal data that can help us understand people's and families' trajectories, as well as the interconnectivity of various life aspects, which we call policy areas. Hey, it took me the better part of my career to develop this perspective and to appreciate the ability of a program like SIPP to help us understand this landscape and find ways to improve society."

Because SIPP follows the same families over time and can provide monthly data on those families, it sheds light on the causes, depth, and persistence of poverty in ways that annual point in time surveys cannot. For example, the Census Bureau's own research and analysis of the dynamics of poverty using SIPP, <https://www.census.gov/library/publications/2022/demo/p70br-179.html>, found "Overall, 27.1 percent of individuals experienced an episodic poverty spell over the period, meaning that their family income was less than their poverty threshold for 2 consecutive months. This compared to 3.3 percent of individuals who experienced chronic poverty, meaning that their family income was less than their poverty threshold for all 36 months. Children were more likely to experience both episodic and chronic poverty, with 35.1 percent of children experiencing an episodic poverty spell and 5.5 percent of children in chronic poverty over the period." While all poverty is harmful to children, chronic poverty is far more damaging than temporary spells. But only SIPP can tell us how many children and families are subject to chronic poverty and thus in need of long term supports, and how many families primarily need quickly implemented policy solutions for a few months at a time. As this study notes, the pandemic highlighted the need for month to month data as it showed that families can in fact move quickly in and out of poverty and that annual data is simply insufficient.

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 — from 68 percent for the 2017 panel to just 37 percent in 2022 — could increase nonresponse bias. Moreover making permanent the 2023 reduction in SIPP's sample size — from 53,000 housing units to just 35,000 — 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 such as Hispanic, Asian, same-sex couples, or nonmetropolitan (rural) households.

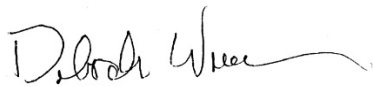
We are particularly concerned that the cut in the sample size will make it harder to compare the experiences of different age groups. We know that young children are particularly vulnerable to the effects of poverty, but with a smaller size sample it will be harder to make comparisons among the

experiences of infants and toddlers, preschoolers, elementary school age children and older children. It will be even more difficult to track differences among a particular age group by race or ethnicity.

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 and, instead, to take steps to secure 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 views. Please direct any questions about these comments to Deborah Weinstein, executive director, at dweinstein@chn.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Deborah Weinstein", with a long, sweeping horizontal line extending to the right.

Deborah Weinstein

Executive Director