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Sheleen Dumas
Department PRA Clearance Officer
Office of the Chief Information Officer
U.S. Department of Commerce
Submitted via reginfo.gov

RE: Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; High-Frequency Surveys Program/Household Pulse Survey (OMB No. 0607-XXXX)

Dear Sheleen Dumas,

The National Women's Law Center (the "Center") appreciates the opportunity to comment on the Federal Register Notice (FRN) regarding the next phase of proposed changes to the U.S. Census Bureau Household Pulse Survey (the "Pulse Survey").¹

The Center fights for gender justice—in the courts, in public policy, and in society—working across the issues that are central to the lives of women and girls. The Center uses the law in all its forms to change culture and drive solutions to the gender inequity that shapes society and to break down the barriers that harm everyone—especially those who face multiple forms of discrimination. For over 50 years, the Center has been on the leading edge of every major legal and policy victory for women.

Census data has been and continues to be, pivotal to the Center's research and public education efforts. The Center relies on Census data to identify the needs of women and their families, highlight the various implications of legislation, fight back against unfair practices and policies, illuminate the different ways women and girls experience life in the United States, and develop evidence-based solutions for health, education, workplace, and income security policy.

Long before the COVID-19 pandemic wreaked havoc on the already fragile child care sector, the Center spearheaded the effort to increase public understanding, support, and investments in the nation's child care infrastructure. The Pulse Survey has been a valuable source for the Center and other stakeholders, providing us with timely data on how access to child care among families with children has changed and the economic fallout from having no child care on different groups of women and families from April 2021 to August 2022 (Phases 3.1 to 3.5) and then from August to October 2023 (Phase 3.10), when child care questions were asked. To our knowledge, the Pulse Survey is the only nationally representative survey by the federal

¹ Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; High-Frequency Surveys Program/Household Pulse Survey, 88 Fed. Reg. 74146 (Oct. 30, 2023), <https://www.federalregister.gov/documents/2023/10/30/2023-23896/agency-information-collection-activities-submission-to-the-office-of-management-and-budget-omb-for>.

government that provides such data in practically real-time. The Center has also used the rich demographic data in the Pulse Survey to document the disparities in child care access and the economic impacts of having no child care by gender, race, disability status, gender identity, and sexual orientation.²

Continuing the Pulse Survey and continuing to include questions on child care in future phases of the Pulse Survey will allow the Center and other stakeholders to track ongoing trends and disparities in access to child care and the economic impacts of having no child care on different groups of women and families at a critical time for the future of the child care sector. To stabilize the child care crisis exacerbated by the pandemic, Congress passed the American Rescue Plan Act (ARPA), signed into law by President Biden in March 2021, providing \$24 billion in child care stabilization grants and \$15 billion in supplemental child care discretionary funds to states.³ States had until September 30, 2023, to liquidate their ARPA stabilization funds and have until September 30, 2024, to liquidate the ARPA discretionary funds. The ARPA child care stabilization fund provided critical support to child care programs, early educators, and families with young children.⁴ However, the recent expiration of the Child Care Stabilization program raises serious questions about how early educators and families with young children will fare in the coming months while facing another child care funding cliff in September 2024.

Because it might take months—if not years—for the impact of the ARPA child care funding cliffs to take shape, we need ongoing data collection to document the impact and to help educate the public on the importance of robust, long-term public investments in the child care sector and providing systemic support for women, children, and families. The Pulse Survey already has the data infrastructure for such an undertaking and has the unique advantage of having collected data on child care arrangements and the economic impacts of having no child care before the Child Care Stabilization program ended. In addition, the Pulse Survey has rich information on a variety of topics, which can be used to examine how experiencing child care disruptions might be correlated with changes in other aspects of economic and mental well-being, as well as how disparities in child care access and stability might be exacerbated by socioeconomic status.

The Center recommends the improvements below to increase the utility of the Pulse Survey pertaining to child care:

- The Center appreciates that the Pulse Survey added back child care questions (EMP7 and EMP8) in Phase 3.10. We also appreciate that EMP4 continues to include “caring for children not in school or daycare” as a response option. We strongly recommend including these questions and response categories pertaining to child care in future phases of the Pulse Survey. This would allow advocates and researchers to track the ever-changing child care access and the economic impact of not having child care among different groups of women and families in the aftermath of the ARPA child care cliffs.
- The current Survey asks about the number of children living in a respondent’s household. Respondents in the survey may be living with children who are not their own and answering questions about those children. It would be helpful to know if the children

² National Women’s Law Center, “High Shares of Women with Children Under 12 Lack Access to Child Care As the Child Care Funding Cliff Approaches” (September 26, 2023), <https://nwlc.org/high-shares-of-women-with-children-under-12-lack-access-to-child-care-as-the-child-care-funding-cliff-approaches/>.

³ American Rescue Plan Act of 2021, Pub. L. No. 117-2, 135 Stat. 31, 207 (2021).

⁴ The White House Council of Economic Advisers Working Paper, “Did Stabilization Funds Help Mothers Get Back to Work After the COVID-19 Recession?” (November 7, 2023), <https://www.whitehouse.gov/wp-content/uploads/2023/11/Child-Care-Stabilization.pdf>.

are one's own versus just in the household. This would permit the Center and other researchers to identify mothers who, in particular, have been disproportionately impacted by child care disruptions, instead of women with children in the household. It could also be helpful to add a question on whether a respondent is raising children in the household (and differentiated by children's age group: under 5 years old, 5-17 years old), which would allow us to identify non-parent caregivers.

- If resources allow, the Center recommends adding questions on changes in child care costs for respondents raising young children. Here are examples of sample questions:

(Universe: Raising children under 5 years old)

Have your child care costs increased in the last 4 weeks?

Response options (select only one):

- Yes, I am paying more for child care, and I have the same number of children in child care and the same child care arrangement as I did 4 weeks ago.
- Yes, I am paying more for child care and I have the same number of children in child care, but my child care arrangements have changed since 4 weeks ago.
- Yes, I am paying more for child care because I am paying for more children in child care than 4 weeks ago.
- No, I am paying the same amount or less for child care while using the same child care arrangements as 4 weeks ago.
- No, I am paying the same amount or less for child care because I am paying for fewer children in child care or I am no longer using the same child care arrangement that I was using 4 weeks ago.
- No, I have not been paying for child care.

If "Yes, I am paying more for child care and I have the same number of children in child care and the same child care arrangement as I did 4 weeks ago" or "Yes, I am paying more for child care and I have the same number of children in child care, but my child care arrangements have changed since 4 weeks ago":

How much have your child care costs increased?

\$_____ per week

Thank you for the opportunity to submit these comments on this important information collection. If you have questions, please contact Melissa Boteach at mboteach@nwlc.org, Karen Schulman at kschulman@nwlc.org, Whitney Pesek at wpesek@nwlc.org, and/or Shengwei Sun at ssun@nwlc.org.

Sincerely,



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Vice President for Income Security and Child Care/Early Learning



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