

April 16, 2024

Jenny Aramony
adrm.pra@census.gov

Re: Generic Clearance for Collection of State Administrative Records Data

Dear Ms. Aramony:

We submit these comments on behalf of the Coalition on Human Needs and the Partnership for America's Children.

The Partnership's mission is to support its network of state and community multi-issue child advocacy organizations in effective advocacy. The Partnership has 49 member organizations in 40 states that advocate to improve policies for children at the state, local and federal level. 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 policy makers, 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 Coalition on Human Needs 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 wellbeing of children, women, the elderly, and people with disabilities. The Coalition on Human Needs monitors and tracks data on human needs in the United States, including data on poverty, on policies that reduce poverty, and on hardship. The Coalition uses Census data including the American Community Survey (ACS) in its work. Along with the Partnership for America's Children, the Coalition is one of four organizations that formed and continues to co-lead Count All Kids, a national group of child-serving organizations that is working to improve the count of young children in all Census Bureau demographic products.

We write today to support the Census Bureau's continuing to acquire State administrative records data.

We agree with the Bureau that these records are important for measuring the accuracy of data collection and that they can be used to improve measures of the population and

economy. The Census Bureau has undertaken research projects to integrate and link Census Bureau data from current surveys and censuses with State administrative records data and we support those projects. We are particularly hopeful that these records will be usable to add individuals into decennial census household records where the household has responded but left someone off, since young children are often missed in the census even when the household responds.

We particularly encourage the Bureau to continue to collect data from the following types of records which may prove helpful in improving the count of young children: nutrition and food assistance programs, including the Supplemental Nutrition Assistance Program (SNAP) and the Special Supplemental Nutrition Program for Women, Infants and Children (WIC); child care subsidies; the Low Income Home Energy Assistance Program (LIHEAP) and Temporary Assistance for Needy Families (TANF). We will submit comments about additional data sources that should be considered in response to the federal register notice on “Collection of State Administrative Records and Third-Party Data” by May 7.

While we strongly support the use of administrative records to supplement self-response census information, we also believe that the record shows that self-response is the most accurate source of data, and much better than proxy data. Accordingly, we urge the Bureau to continue to devote significant resources to collecting data from self-response and the Non-Response Follow Up (NRFU) process and to continue to offer multiple avenues of response.

If you have any questions about these comments please contact Deborah Weinstein at dweinstein@chn.org or Marquita Little Numan at mnuman@foramericaschildren.org

Sincerely,

Deborah Weinstein, Executive Director, Coalition on Human Needs

Marquita Little Numan, Executive Director, Partnership for America's Children