

June 20, 2024

Ms. Sheleen Dumas
Departmental Lead PRA Officer
Office of the Chief Information Officer
U.S. Department of Commerce
14th and Constitution Avenue NW
Washington, DC 20230

Dear Ms. Dumas,

RE: May 22, 2024 [Federal Register Notice of information collection and request for comments in regard to generic clearance for collection of state administrative records data](#), Docket Number USBC-2024-11232, OMB number 0607-0995

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 48 member organizations in 39 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 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; low income energy assistance programs (LIHEAP); and Temporary Assistance for Needy Families (TANF).

While we strongly support the use of administrative records to supplement self-response census information, we also believe that research 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