



COALITION ON HUMAN NEEDS

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CHN Comments on High-Frequency Surveys Program/Household Trends and Outlook Pulse Survey (HTOPS)

Submitted via www.reginfo.gov/public/do/PRAMain

The Coalition on Human Needs (CHN) is submitting the comments below in response to the request for comments on the High Frequency Surveys Program/Household Trends and Outlook Pulse Survey published in the Federal Register on December 9, 2024, *OMB Control Number:* 0607-1029.

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 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. 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.

CHN strongly supports the Household Trends and Outlooks Pulse Survey (HTOPS) because it offers the only national data on hardship that is near real time. CHN is grateful that the Bureau confirmed that it plans to continue collecting data on hardship and urges the Bureau and OMB to try to produce this data by state, at least for large states with adequate sample sizes, and for the smallest possible subnational geographic areas. We also urge the Bureau to try to collect the data more frequently than every two months, if funding permits, particularly in areas of disasters or other major upheaval that can greatly increase hardship.

CHN also supports the HTOPS survey because it provides an important vehicle for testing possible changes to the 2030 census, the American Community Survey, SIPP, and other important demographic surveys.

We applaud the development of the original Household Pulse Survey, which was created with amazing speed on critical topics when the pandemic began. It provided essential data on how people were faring at a perilous time, when there were few or no other ways to get reliable information. The pandemic may be over, but the need for real-time data on hardship continues. Indeed, while the Household Pulse Survey was a brilliant and enormously important response to the pandemic, it also filled a long-standing need for better information on hardship. We note that it has provided data on hardship frequently and in near real time, when most other data on hardship is produced a year or more after it is collected. In some cases, such as information on how many people are struggling to keep a roof over their heads, it has provided information for which there is no comparable source even on a delayed basis. While we recognize that the Bureau can no longer continue the Household Pulse Survey in its original form because of the opposition of cell phone companies, we believe that having near real-time hardship data is invaluable and must continue. We believe that hardship data should be permanently collected and produced on a near real-time basis because no other data provides this critical information.

We also believe that this data should be produced for all states as well as the national level. We understand that the Bureau plans to start with only national data but eventually to reach a sample size that will permit data at a regional or district level. We note that the Census Scientific Advisory Committee (CSAC) made some suggestions during the fall 2024 meeting for approaches for producing more localized data, such as aggregating data over time, and we thank the Bureau for accepting the CSAC [recommendation 49](#) to “determine how the survey may be able to support state-level estimates,” pending funding for the work.

We offer some examples of the many ways that CHN and its member organizations have used the Household Pulse Survey hardship data.

The Coalition on Human Needs (CHN) regularly uses the hardship data from the Household Pulse Survey in its blogs and emails to inform policymakers, human needs advocates and the public of the extent of hardship in our country. We have made frequent use of food hardship data broken down by race, income levels, and presence of children in the household. We have similarly cited the data showing difficulty in meeting usual household expenses, the experience of falling behind on rent, and inability to afford home energy costs, including foregone medical and other expenditures in order to afford energy bills. CHN follows the Census Bureau’s guidance in calculating percentages based only on the responses to the specific question being

studied, and makes those percentage calculations available to advocates. CHN also uses the hardship data in its presentations to advocates and policy makers. CHN has also often made the state level data readily accessible to advocates to encourage the state data usage.

The National Women's Law Center (NWLC) periodically puts out analyses of the Household Pulse Survey data to show the difficulty faced by women of color, disabled women, and LGBTQ adults in affording basic necessities such as food, housing, and child care.

The Household Pulse Survey is one of the few Bureau surveys that includes sexual orientation and gender identity (SOGI) questions. That unique feature, combined with the frequency of the survey, has been instrumental for researchers and advocates looking to do research about the economics and health of LGBTQ people.

Academics have also used the Pulse hardship data because it allows for pooling waves to get larger sample sizes than we often have.

We also know that state organizations rely on the state hardship data. For example, NH Hunger Solutions has a Dashboard on their website that includes hunger data and is updated monthly. They report that it is the best real time measure of food insecurity and report they use it constantly in their public awareness and advocacy work. San Diego for Every Child looks to the Household Pulse Survey as a truer measure of how its families are "actually" doing. As an organization focused on cutting the experience of child poverty, it is not only trying to raise families above the poverty level, it is also trying to elevate quality of life. This includes the very necessary—and perhaps even more accurate—data and measures of economic and social impact on households, precisely what the HPS helps capture. The NC Budget & Tax Center regularly uses Household Pulse Survey data to analyze the prevalence of hardship among NC families in real time. The Center for the Advancement of Women at Mount St. Mary's University used the hardship data in its 2021 Report on the Status of Women and Girls in California. Similarly, LGBTQ+ organizations use the state level data: for example, in Minnesota they use the Pulse survey to assess a variety of aspects of life including housing hardship.

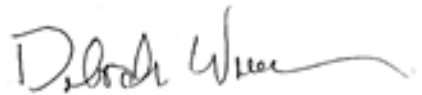
Because we believe that the Household Pulse Survey is a unique, invaluable, and necessary measure of hardship, we applaud the decision to keep continuing to collect hardship data in HTOPS and urge you to work towards collecting and reporting this data at or near state levels.

We also note that HTOPS can provide an important tool for assessing potential changes to other surveys. We note that the topical survey that will field in January will include a household roster update. We hope that this will provide a more effective roster mechanism for improving the

count of young children in the 2030 Census and the American Community Survey. We also support the use of HTOPS for testing other approaches that might improve the count of young children.

For these reasons, CHN supports the HTOPS survey and hopes it can be expanded sufficiently to produce state as well as national data.

Thank you for the opportunity to submit these comments. Please direct any questions to Deborah Weinstein at dweinstein@chn.org.

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

Deborah Weinstein
Executive Director, CHN