



COALITION ON HUMAN NEEDS

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September 19, 2025

CHN Additional Comments on the High Frequency Surveys Program Household Trends and Outlook Pulse Survey (September, October), OMB Control Number 0067-1029

The Coalition on Human Needs (CHN) is submitting these additional 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 August 20, 2025, 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.

We are submitting these additional comments now that we have been able to review the actual survey language proposed for use, which at the time of our prior comments had not yet been posted on www.reginfo.gov, apparently due to some website changes currently being undertaken.

As we have previously said, we strongly support the HTOPS survey being used for both collecting data on hardship and for testing Census research. We note that it is unique in providing relatively current data.

Comment on all months

We note that you do not have a survey proposed for November. We ask that if you are going to skip November, you make that public. If you are still developing a November survey we look forward to reviewing it.

We note that the Bureau released the first round of public use data, for January and February, in April 2025 but has not yet released data for any subsequent months. We understand that it has been delayed and it will still be released. We encourage you to do so as promptly as resources and need for accuracy permit.

We ask you to also prepare data tables for this data, and particularly for the hardship data. It is of great value even though it is currently only available at the national level, but many people who need to access this data do not have the capacity to analyze public use data. Since it is only available at the national level for now, we believe this should be a relatively low burden request.

We are concerned that significant non-response bias may limit the accuracy and utility of the survey. OMB's *Standards and Guidelines for Statistical Surveys* (September 2006) direct federal statistical agencies to "maximize data quality through attention to issues of coverage, nonresponse, measurement, and processing error" and require agencies to "conduct a nonresponse bias analysis when unit response rates are below 80 percent." Anecdotal evidence from community-based organizations and multiple media reports suggest that many immigrant households are currently reluctant to engage with government surveys due to fear of Immigration and Customs Enforcement (ICE) activities. If these households disproportionately decline to respond, survey findings will underrepresent their conditions and experiences. Such systematic nonresponse could result in biased estimates of willingness to respond to the 2030 Census, employment, well-being, access to medical care, food, and childcare, and other important measures.

To address this risk, we encourage the Bureau to:

- Employ robust nonresponse bias analyses in line with OMB and Census Bureau quality standards, with findings made publicly available;
- Transparently document differential response rates across key demographic groups.

By proactively addressing the risk of nonresponse bias, the Census Bureau can help ensure that the Household Trends and Outlook Pulse Survey fulfills its mandate to provide credible and high-quality data for decision-making.

September HTOPS

We support the use of the September HTOPS to conduct the 2030 Census Planning Survey, which is “designed to understand attitudes and behaviors that relate to 2030 Census participation across demographic characteristics.” We were very pleased to see that it included two questions on the count of children. However, the first question asks about all children, not just young children, while young children are the group that is significantly undercounted. We recommend that the next time you conduct a CBAMS survey you specify young children, infants and young children, or children from birth to age five. We realize that there is value in asking the same questions over time to measure change in responses, but we think it is more important to focus on this undercounted group. We also find the wording of the second question about children somewhat confusing. The question asks if the census “counts” children and the response offered is, “Yes, used for counting ALL children...” But it should really ask what they think they are supposed to do in filling it out. For future surveys we suggest language such as “Do you think you are supposed to include children of ALL ages, including babies, and toddlers, or only children of school age?”

We also like your list of reasons for filling out the census, but we think it is important to also ask, the next time you do this survey, what information would make them more likely to fill it out. For example, many people might pick one message, such as it is my civic duty, as the most important reason to fill out the census, but they might be the ones who would fill it out anyway. If you can ask which message is more likely to persuade them to answer the census you might discover that a different message, such as one about funding for the community, might be more likely to persuade people to respond who were otherwise unlikely to.

We commend you for asking the question “Is the census used to locate people living in the country without documentation, or is it not used for this?” because it will be important to understand what people think about this in order to plan outreach activities. We also commend you for asking questions about how people think about the Bureau using administrative data.

We urge you to make the analysis of the 2025 survey questions on young children available to the public, and to look at differences in responses to this question by major demographic characteristics such as race and Hispanic origin since those factors greatly affect which children are counted.

October and December HTOPS Surveys

We are deeply grateful for the October and December survey questions which include a wide variety of important topics from the prior Household Pulse survey including a number that measure hardship. We urge you to process and publicize this data promptly since it is extremely valuable. We hope that you will soon be able to produce data at subnational levels, perhaps for large states, regional areas, or by combining two months of data.

Additionally, the October and December survey questions include a question about the “main reason for not working” (among those who did not work for pay or profit in the previous 7 days). The possible reply options should include “I was unable to find work.” Given the large unemployment rates among young adults, we must assume some people are unemployed without having been laid off.

Thank you for the opportunity to submit these comments. If you have any questions about these comments please contact Deborah Weinstein at dweinstein@chn.org.

Sincerely,

A handwritten signature in black ink that reads "Deborah Weinstein". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Deborah Weinstein,

Executive Director

Coalition on Human Needs