



September 19, 2025

RE: August 20, 2025 [Federal Register Notice](#) on High-Frequency Surveys Program/Household Trends and Outlook Pulse Survey (HTOPS)

We commend the Census Bureau for its commitment to producing timely, relevant statistics through the Household Trends and Outlook Pulse Survey. This effort aligns with the Bureau's mission under Title 13 of the U.S. Code to collect and provide quality data on demographic, social and economic trends in the U.S. The September 2025 survey includes important questions to inform 2030 Census planning, and the October and December versions include questions that will illuminate the scale of benefits or hardships that are being felt as economic and policy conditions change.

At the same time, 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) directs federal statistical agencies to "maximize data quality through attention to issues of coverage, nonresponse, measurement, and processing error" and requires 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. This includes households with both immigrant and native-born community members, who are experiencing the impact of ICE activities on their daily lives. 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, and make the findings made publicly available.
- Transparently document differential response rates across key demographic and socioeconomic groups.


By 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.

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 comment.

Sincerely,



Allison Plyer
Co-Chair of the CQR Task Force
Chief Demographer, The Data Center



Cara Brumfield
Co-Chair of the CQR Task Force
Senior Fellow, National Conference on
Citizenship



Erica Bernal-Martinez
Chief Executive Officer
NALEO Educational Fund