

Draft ICR request -- High-Frequency Surveys Program/Household Pulse Survey (OMB Control #: 0607-XXXX)

Andrew Reamer <areamer@gwu.edu>

Thu 8/17/2023 10:19 AM

To: Cassandra Logan (CENSUS/ADDP FED) <Cassandra.Logan@census.gov>

Cc: PRAcomments <PRAcomments@doc.gov>

Dear Ms. Logan,

On behalf of the American Economic Association (AEA) and the Industry Studies Association (ISA), I request a copy of the draft ICR for the High-Frequency Surveys Program/Household Pulse Survey (OMB Control #: 0607-XXXX), as invited by the August 17 [Federal Register](#). Thank you--we look forward to seeing the draft data collection instrument and supporting statement.

In the meantime, I've posted the following for AEA and ISA members <https://www.aeaweb.org/forum/3954/frequency-surveys-program-household-comments-invited-renewal> and am happy to revise on the receipt of the draft ICR materials.

Sincerely,

Andrew Reamer
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To: Cassandra Logan
Survey Director, U.S. Census Bureau
Cassandra.Logan@census.gov

RE: High-Frequency and Rapid Response Surveys/Household Pulse Survey

Cassandra,

The [Census Bureau's Household Pulse Survey](#) has been an invaluable resource for legislative decision-making regarding housing in our state. Data obtained from the Pulse Survey provides information on the number of people behind on rent, whether they have been able to access assistance, whether they feel that they are likely to experience an eviction, whether they have had to rely on savings, credit cards or family to make ends meet, and whether they have been forced to move because of a rent increase. No other publicly accessible survey gives legislators this kind of insight.

As we move forward with housing policy advances and budget investments, the continuation of this survey is vital to the development of informed leadership strategies and the wellbeing of Washington residents. We, the undersigned, strongly encourage the Census Bureau to continue collecting this critical data.

Representative Strom Peterson

Housing Committee Chair

Washington State House of Representatives | 21st Legislative District
324 John L. O'Brien Building | Olympia, WA 98504 | 360.786.7950

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Rep. Emily Alvarado
34th Legislative District
Vice Chair, Housing
Vice Chair, Local government
Capital Budget

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Rep. Jamila Taylor
Majority Caucus Vice Chair
30th Legislative District
Vice Chair, Human Services, Youth, & Early
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Rep. Marcus Riccelli
3rd Legislative District
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Rep. April Berg
44th Legislative District
Chair, Finance
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Rep. Bill Ramos
5th Legislative District
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Rep. Vandana Slatter
48th Legislative District
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32nd Legislative District
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Health Care & Wellness
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High-Frequency and Rapid Response Surveys/Household Pulse Survey: Comments

Erica DePalma <edepalma@uswateralliance.org>

Fri 10/13/2023 9:52 AM

To:Cassandra Logan (CENSUS/ADDP FED) <Cassandra.Logan@census.gov>

Cc:PRAComments@doc.gov <PRAComments@doc.gov>

You don't often get email from edepalma@uswateralliance.org. [Learn why this is important](#)

Dear Cassandra,

On the Household Pulse Survey, I saw that there were a few questions related to energy bills:

- HSE10 In the last 12 months, how many months did your household reduce or forego expenses for basic household necessities, such as medicine or food, to pay an energy bill?
- HSE12 In the last 12 months, how many times was your household unable to pay an energy bill or unable to pay the full bill amount?

I would like to comment the value of replicating the above questions for **water bills**. Asking question(s) related to water bill debt would also be helpful. For example:

- In the last 12 months, how much debt has your household accrued because your household was unable to pay your water bill? (with answers ranging from a few hundred to a few thousand).

Having this information collected by the Census and publicly available for water service providers and others to access would be extremely beneficial to understand the tangible impacts that water bills have on households.

Providing reliable water and wastewater services is both expensive and imperative. If water utilities leaders and advocates have more information and data related to water bill burdens at the census level, solutions may be explored more readily, specifically to support low-income households.

Thank you for your time and consideration,
Erica

Erica DePalma

Program Manager

edepalma@uswateralliance.org

Cell: (203)-640-8631

Pronouns: she, her, hers

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High-Frequency and Rapid Response Surveys/Household Pulse Survey

Kasey Burton <KBurton@ccsww.org>

Mon 8/21/2023 4:38 PM

To:Cassandra Logan (CENSUS/ADDP FED) <Cassandra.Logan@census.gov>

Good afternoon,

I am submitting this comment regarding the High-Frequency and Rapid Response Surveys/Household Pulse Survey.

I am grateful for the Bureau's work to gather this data and ask that it continues to do so. As a housing advocate, the Pulse surveys provide me with invaluable information. First, it helps me understand what is happening in my community and what people are going through. It also helps my team assess and amend our priorities as needed to ensure we are providing services that address the most pressing needs in our area. Further, this data helps inform our housing and policy advocacy efforts and ensures we are providing well-informed testimony, comments, and suggestions to stakeholders, government agencies, and elected officials.

Beyond the benefit to the work I do, I firmly believe that this data collection is beneficial to the government as a whole, as it has the same needs as my organization—namely, understanding what is happening with the nation's population regarding housing issues, regular reevaluation of priorities and projects, and the opportunity to review important information to engage in properly-informed decision-making.

I therefore ask that the Census Bureau continue to gather the information collected pursuant to the Pulse surveys, as it is indispensable.

Thank you for your time,

Kasey Burton
Senior Staff Attorney
Tenant Law Center | Catholic Community Services of Western Washington
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November 30, 2023

U.S. Census Bureau, Department of Commerce

Re: High-Frequency Surveys Program/Household Pulse Survey

To Whom It May Concern,

The First Five Years Fund (FFYF) appreciates this opportunity to comment on the [U.S. Census Bureau, Department of Commerce's proposal](#) to collect information for the High-Frequency Surveys Program/Household Pulse Survey. FFYF's mission is to ensure all children from birth through age five have equitable access to affordable, comprehensive, high-quality early care and education (ECE) to support their healthy development and help them achieve their full potential in school and life. As part of this work, we encourage practitioners and policymakers on both sides of the aisle to use ECE data to make effective decisions about serving the nation's youngest learners and their families. This includes continuous and real-time data on the availability of child care, the types of child care that families want and need, the barriers that families face in accessing care, and the impact that access to these programs has on young children's development as well as families' ability to work and maintain economic stability. FFYF relies on the U.S. Census Bureau as the benchmark for high-quality data that is essential to understanding our nation's child care landscape and improving access to quality child care. FFYF commends the U.S. Census Bureau for its work on the Count All Kids initiative to reduce the undercount of young children and particularly acknowledges the Census for its recent efforts in collecting and analyzing data on child care arrangements in the Household Pulse Survey from September to December 2022. On behalf of the ECE field, we thank you for elevating the issue in releasing the article "[Most Parents Don't Have Any Formal Child Care Arrangements](#)". Having the U.S. Census Bureau weigh in on these issues is a significant stride forward in data collection for the ECE field. FFYF looks forward to continued leadership from the U.S. Census Bureau as it pertains to prioritizing data collection on young children, particularly as it relates to child care arrangements for families with children ages five and under.

FFYF firmly supports continuing to collect questions EMP7 and EMP8 about child care arrangements and believes amending D12, and EMP 4,7, and 8, as well as adding the additional questions described below, will increase our understanding of the complex and changing issues families with children ages five and under face, and help to improve access to high-quality early learning opportunities.

The COVID-19 pandemic upended the lives of parents and children in a multitude of ways; child care programs closed, stay-at-home orders were issued in many states, and parents struggled to take care of their children while balancing work and other responsibilities. While the child care sector was already fractured, the pandemic severely disrupted the child care landscape and shined a light on the essential role that child care plays in our nation's economy. Federal child care and early learning programs are essential to help working parents find and afford the care they need to go to work and ensure their kids can thrive. Yet the high cost and limited supply of quality, reliable child care that works for parents means it can be very hard to find. Wait lists are long and care can be so expensive that many working parents simply can't afford it. According

to [Child Care Aware of America](#), the national average price of child care in 2022 was \$10,853 per year, which on average represents 10% of a two-income family's earnings and 22% of a single parent's earnings.

However, timely and comprehensive data on ECE preferences and experiences, as well as barriers to access, quality, and affordability, are often unavailable or inaccessible. Given its scope and consistent collection, the Household Pulse Survey is well-positioned to better identify and understand the current issues and gaps families experience with child care in near real-time. This data is essential to make informed policy decisions about ECE.

FFYF appreciates the inclusion of questions relating to child care and recommends amending questions D12, and EMP 4,7, and 8 (see detailed amendments below) to more specifically isolate and understand the child care experiences of families with children ages five and under. Children ages five and under experience learning in a variety of early care and education environments and their families face a different set of challenges in finding and affording care than children who are older and can participate in the K-12 school system. These young children's social development and educational progress have been particularly impacted by the COVID-19 pandemic and more research is needed to properly measure where these young children are receiving care, the types of care that families want for their young children, the barriers that families face in accessing care that works best for their family, and the impacts that child care availability and affordability have on families' employment and economic stability.

Parents rely on a range of options for early learning and care for their children ages five and under, including center-based care, such as child care centers, on-site care (in or near a workplace), preschool, faith-based programs, as well as home-based care, which may include care in a family child care home, or from a relative, nanny, au pair, or babysitter. This diverse landscape of opportunities is often referred to as a mixed-delivery system since there are numerous programs and funding sources that work together to care for children. Given the multitude of options in the early care and education landscape and in order to analyze what child care options parents want and need, particularly after COVID-19 disrupted the child care sector, it is important for these child care options to be included in the survey and analyzed distinctly.

FFYF Suggested Amendments

D12 “In your household, are there... Select all that apply. Children under 5 years old? (1), Children 5 through 11 years old? (2), Children 12 through 17 years old? (3)”

- FFYF recommends amending the following response options:
 - From “Children under 5 years old” (1) to “Children 5 years and younger” (1)
 - From “Children 5 through 11 years old” (2) to “Children 6 through 11 years old” (2)

Justification: Child care and early learning programs serve children through their 5th year. In order for the ECE community to fully utilize the data efforts underway by the U.S. Census Bureau it is imperative to include 5-year-olds in the young children category. This aligns with the ECE sector's definition of serving children from birth through age five.



EMP4 “What is your main reason for not working for pay or profit?”

- FFYF recommends amending the response option from “I am/was caring for children not in school or daycare” to “I chose to care for my children not in school or daycare”.
- Additionally, FFYF recommends adding “I couldn’t find or afford child care” as one of the response options to this question.

Justification: Adding this option will help to distinguish parents who have stepped out of the labor force because they want to be the primary caregivers for their children from parents who want to work for pay or profit but can’t because they face barriers accessing child care. This is essential to understand the impact that lack of access to child care has on employment.

EMP7 “Next, we are going to ask about the childcare arrangements for children in the household. At any time in the last 4 weeks, were any children in the household unable to attend daycare or another childcare arrangement as a result of child care being closed, unavailable, unaffordable, or because you are concerned about your child’s safety in care? Please include before school care, after school care, and all other forms of childcare that were unavailable.

- For respondents who answered “Yes” to EMP7, FFYF recommends adding the question “What is the age(s) of the child(ren) who was unable to attend daycare or another childcare arrangement as a result of child care being closed, unavailable, unaffordable, or because you are concerned about your child’s safety in care?” Respondents may select more than one of the following: 0 to 3 years old (1), 3 through 5 years old (2), 6 through 11 years old (3), and 12 through 17 years old (4).

Justification: Adding this clarifying question will isolate the difficulty of accessing child care for families with children ages five and under from that of older children who can participate in the K-12 school system. Additionally, we know there is a pervasive need for infant and toddler care options. Including the 0 to 3 age range in this question would help further stratify that population, as they have unique needs.

- After this question, if a respondent selected that they have a child who is “0 to 3 years old” or “3 through 5 years old”, FFYF recommends adding the following question, “What was/is the primary reason this child was unable to attend daycare or another child care arrangement?” Select one among the following: It was closed (1), There were no more available slots (2), It was unaffordable (3), I was concerned about my child’s safety in care (4), It was not conveniently located (5), The available hours did not fit my family’s schedule (5), Other reason, please specify _____ (6).

Justification: There are a variety of different barriers families face when accessing child care. Adding this question will help to identify the most prominent barriers that families with young children face in near real-time, which is vital to inform federal policy solutions to improve access to quality child care.

EMP8 “Which if any of the following occurred in the last 4 weeks as a result of childcare being closed, unavailable, unaffordable, or because you are concerned about your child’s safety in care?”

- FFYF recommends subsequently adding the question “The affected child(ren)is/are:” Respondents may select more than one of the following: 0 to 3 years old (1), 3 through 5 years old (2), 6 through 11 years old (3), and 12 through 17 years old (4).



Justification: Adding this question is necessary to better understand the particular impact that child care options for young children have on parents' employment and economic stability.

In addition to the above amendments to questions D12 and EMP 4,7, and 8, FFYF recommends adding the following questions after EMP8. Given the following questions focus on child care arrangements for families with children ages 5 and under, we recommend adding a section entitled “Child Care for Young Children” and making them available to respondents who selected “Children 5 years and younger” in question D12:

This section includes questions on child care arrangements for families with children ages 5 and under.

- CARE1. Where is/are your child(ren) age five and under being cared for? Respondents may select more than one of the following: My partner or I care for my child (1), Family member, friend, or neighbor (2) Child care center (3), Family child care home (4), Faith-based program (5), Nanny, au pair, or babysitter (6), Head Start (7) Public Pre-K (8), Other, please specify ____ (9)
- CARE2. Are you satisfied with your current child care arrangement? Respondents must select one of the following: Yes (1), No (2), Unsure (3)
- CARE3. Have you had to change your child care arrangement in the last 2 months? Respondents must select one of the following: Yes (1), No (2)
- CARE4. If selected “Yes” to CARE3- What was the reason? Respondents may select more than one of the following: Previous child care closed (1), Previous child care was unaffordable (2), Previous child care was too far away or inaccessible (3), Previous child care did not fit the hours we needed care (4) I was concerned about my child’s safety in previous child care (5), We found child care that better fit our needs (6), We moved (7) Other, please specify ____ (8)
- CARE5. What are the barriers to getting the child care you need/prefer? Respondents may select as many as apply: Available care is too expensive (1), Available care is not conveniently located (2) Available care doesn’t fit my family’s needs (3), Care is not available (4), Care is not available at the times I need it (5), I want to care for my child but I am unable to (6) I want my partner or a family member to care for my child but they are unable to (7), There are no barriers (8), Other, please specify ____ (9)
- CARE6. What trade-offs have you had to make to access the care you have? Respondents may select as many as apply: I am borrowing money or using my savings to pay for child care (1), I have to arrive at work late or leave early to accommodate my current child care arrangement (2), I have to drive far distances to access child care (3), I had to turn down a promotion because my child care cannot cover more hours (4), I had to quit my job to care for my child (5), I have to work more/longer hours to afford child care (6), I am not making any tradeoffs (7) Other, please specify ____ (8)
- CARE7. How difficult was it to find child care that works for your family? Respondents must select one of the following: Not difficult (1), Somewhat difficult (2), Very difficult (3), Unable to find child care due to difficulty (4), Did not try to find child care (5)
- CARE8. How do you pay for child care? Respondents must select one of the following: I pay entirely out-of-pocket (1), I receive a subsidy voucher to attend a child care program (2), I receive free child care through Head Start (3), I receive free child care through a public Pre-K program (4) I do not pay for child care (5)

FFYF firmly believes that continuous, quality data collection through surveys is crucial to understanding the experiences of young children and their families and equipping leaders and policymakers with the information needed to improve the child care system. We appreciate your consideration of these comments and welcome further conversations and your partnership. If



you have any questions or if we can provide additional information, please do not hesitate to reach out to Amanda Guarino, Managing Director, Policy and National Partnerships, at aguarino@ffyf.org.

Sincerely,

A handwritten signature in black ink that reads "Amanda Guarino". The signature is written in a cursive style with a prominent initial 'A'.

Amanda Guarino
Managing Director, Policy and National Partnerships
First Five Years Fund





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SUITE 700
WASHINGTON, DC 20005
202-588-5180
NWLC.ORG

November 28, 2023

Sheleen Dumas
Department PRA Clearance Officer
Office of the Chief Information Officer
U.S. Department of Commerce
Submitted via reginfo.gov

RE: Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; High-Frequency Surveys Program/Household Pulse Survey (OMB No. 0607-XXXX)

Dear Sheleen Dumas,

The National Women's Law Center (the "Center") appreciates the opportunity to comment on the Federal Register Notice (FRN) regarding the next phase of proposed changes to the U.S. Census Bureau Household Pulse Survey (the "Pulse Survey").¹

The Center fights for gender justice—in the courts, in public policy, and in society—working across the issues that are central to the lives of women and girls. The Center uses the law in all its forms to change culture and drive solutions to the gender inequity that shapes society and to break down the barriers that harm everyone—especially those who face multiple forms of discrimination. For over 50 years, the Center has been on the leading edge of every major legal and policy victory for women.

Census data has been and continues to be, pivotal to the Center's research and public education efforts. The Center relies on Census data to identify the needs of women and their families, highlight the various implications of legislation, fight back against unfair practices and policies, illuminate the different ways women and girls experience life in the United States, and develop evidence-based solutions for health, education, workplace, and income security policy.

Long before the COVID-19 pandemic wreaked havoc on the already fragile child care sector, the Center spearheaded the effort to increase public understanding, support, and investments in the nation's child care infrastructure. The Pulse Survey has been a valuable source for the Center and other stakeholders, providing us with timely data on how access to child care among families with children has changed and the economic fallout from having no child care on different groups of women and families from April 2021 to August 2022 (Phases 3.1 to 3.5) and then from August to October 2023 (Phase 3.10), when child care questions were asked. To our knowledge, the Pulse Survey is the only nationally representative survey by the federal

¹ Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; High-Frequency Surveys Program/Household Pulse Survey, 88 Fed. Reg. 74146 (Oct. 30, 2023), <https://www.federalregister.gov/documents/2023/10/30/2023-23896/agency-information-collection-activities-submission-to-the-office-of-management-and-budget-omb-for>.

government that provides such data in practically real-time. The Center has also used the rich demographic data in the Pulse Survey to document the disparities in child care access and the economic impacts of having no child care by gender, race, disability status, gender identity, and sexual orientation.²

Continuing the Pulse Survey and continuing to include questions on child care in future phases of the Pulse Survey will allow the Center and other stakeholders to track ongoing trends and disparities in access to child care and the economic impacts of having no child care on different groups of women and families at a critical time for the future of the child care sector. To stabilize the child care crisis exacerbated by the pandemic, Congress passed the American Rescue Plan Act (ARPA), signed into law by President Biden in March 2021, providing \$24 billion in child care stabilization grants and \$15 billion in supplemental child care discretionary funds to states.³ States had until September 30, 2023, to liquidate their ARPA stabilization funds and have until September 30, 2024, to liquidate the ARPA discretionary funds. The ARPA child care stabilization fund provided critical support to child care programs, early educators, and families with young children.⁴ However, the recent expiration of the Child Care Stabilization program raises serious questions about how early educators and families with young children will fare in the coming months while facing another child care funding cliff in September 2024.

Because it might take months—if not years—for the impact of the ARPA child care funding cliffs to take shape, we need ongoing data collection to document the impact and to help educate the public on the importance of robust, long-term public investments in the child care sector and providing systemic support for women, children, and families. The Pulse Survey already has the data infrastructure for such an undertaking and has the unique advantage of having collected data on child care arrangements and the economic impacts of having no child care before the Child Care Stabilization program ended. In addition, the Pulse Survey has rich information on a variety of topics, which can be used to examine how experiencing child care disruptions might be correlated with changes in other aspects of economic and mental well-being, as well as how disparities in child care access and stability might be exacerbated by socioeconomic status.

The Center recommends the improvements below to increase the utility of the Pulse Survey pertaining to child care:

- The Center appreciates that the Pulse Survey added back child care questions (EMP7 and EMP8) in Phase 3.10. We also appreciate that EMP4 continues to include “caring for children not in school or daycare” as a response option. We strongly recommend including these questions and response categories pertaining to child care in future phases of the Pulse Survey. This would allow advocates and researchers to track the ever-changing child care access and the economic impact of not having child care among different groups of women and families in the aftermath of the ARPA child care cliffs.
- The current Survey asks about the number of children living in a respondent’s household. Respondents in the survey may be living with children who are not their own and answering questions about those children. It would be helpful to know if the children

² National Women’s Law Center, “High Shares of Women with Children Under 12 Lack Access to Child Care As the Child Care Funding Cliff Approaches” (September 26, 2023), <https://nwlc.org/high-shares-of-women-with-children-under-12-lack-access-to-child-care-as-the-child-care-funding-cliff-approaches/>.

³ American Rescue Plan Act of 2021, Pub. L. No. 117-2, 135 Stat. 31, 207 (2021).

⁴ The White House Council of Economic Advisers Working Paper, “Did Stabilization Funds Help Mothers Get Back to Work After the COVID-19 Recession?” (November 7, 2023), <https://www.whitehouse.gov/wp-content/uploads/2023/11/Child-Care-Stabilization.pdf>.

are one's own versus just in the household. This would permit the Center and other researchers to identify mothers who, in particular, have been disproportionately impacted by child care disruptions, instead of women with children in the household. It could also be helpful to add a question on whether a respondent is raising children in the household (and differentiated by children's age group: under 5 years old, 5-17 years old), which would allow us to identify non-parent caregivers.

- If resources allow, the Center recommends adding questions on changes in child care costs for respondents raising young children. Here are examples of sample questions:

(Universe: Raising children under 5 years old)

Have your child care costs increased in the last 4 weeks?

Response options (select only one):

- Yes, I am paying more for child care, and I have the same number of children in child care and the same child care arrangement as I did 4 weeks ago.
- Yes, I am paying more for child care and I have the same number of children in child care, but my child care arrangements have changed since 4 weeks ago.
- Yes, I am paying more for child care because I am paying for more children in child care than 4 weeks ago.
- No, I am paying the same amount or less for child care while using the same child care arrangements as 4 weeks ago.
- No, I am paying the same amount or less for child care because I am paying for fewer children in child care or I am no longer using the same child care arrangement that I was using 4 weeks ago.
- No, I have not been paying for child care.

If "Yes, I am paying more for child care and I have the same number of children in child care and the same child care arrangement as I did 4 weeks ago" or "Yes, I am paying more for child care and I have the same number of children in child care, but my child care arrangements have changed since 4 weeks ago":

How much have your child care costs increased?

\$_____ per week

Thank you for the opportunity to submit these comments on this important information collection. If you have questions, please contact Melissa Boteach at mboteach@nwlc.org, Karen Schulman at kschulman@nwlc.org, Whitney Pesek at wpesek@nwlc.org, and/or Shengwei Sun at ssun@nwlc.org.

Sincerely,



Melissa Boteach

Vice President for Income Security and Child Care/Early Learning

Karen Schulman

Karen Schulman
Director of State Child Care Policy

Whitney Pesek

Whitney Pesek
Director of Federal Child Care Policy

Shengwei Sun

Shengwei Sun
Senior Research Analyst, Income Security and Child Care

September 19, 2025

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

I am baffled as to why the FRN regarding this edition of the HTOPS survey research, to be conducted in September 2025, was only published on August 20, 2025, since this precluded input regarding the need to add questions, the possibility of deleting questions, or question phrasing.

I assume that the HTOPS panel design also precludes any modification of sampling procedures. That being said, it clearly would have been useful to over-sample census tracts with substantial proportions of non-citizens, given the generally-accepted hypothesis that adding a citizenship question to the 2030 Census will suppress response from households with non-citizens (Brown, Heggeness, and Murray-Close 2023; Brown and Heggeness 2025) and the practical objective of determining the extent of that suppression and messaging and/or operational changes that would be useful to minimize differential non-response.

Nonetheless, it is very welcome news to see that the Census Bureau is including a number of questions that are definitely relevant to understanding the factors that will affect non-citizen response. It is an important step forward although the survey language is not particularly well-designed for the hard-to-count individuals whose perspectives it seeks to understand.

It should be remembered that the Census 2023 Planning Survey will provide only an initial assessment. It seems to be somewhat better in improving understanding of barriers than in understanding motivators. The survey findings should be understood as important but not definitive; and, ideally, there should be a robust discussion of the limitations of the research.

It will be crucial to follow up with qualitative research, including focus groups but, ideally, also including community ethnographic case studies as was done in 1990, to more fully understand the community dynamics of census as well as the individual and household dynamics of census response. It is extremely important to continually keep in mind that individual decisions about response are linked to multiple dimensions of local community life, that survey respondents' decisions to participate in a survey, especially if there are concerns about the consequences of participation, are forged, in large measure, by the social networks they are engaged in.

My hope is that analyses of the current Census 2030 Planning survey can be completed in time to be incorporated into design of the 2026 Census Test research.

It would also be very helpful to sponsor a convening to discuss implications of the findings with market research experts, social network analysts (not just social media but on-the-ground influencing), and researchers with expertise in differential non-response and resulting differential undercounts.

Addressing the Major Issues Regarding Census Response from Households with Non-Citizens

My own data analysis and research have focused on differential response of Latinos and Latino immigrants and resultant undercounts.

I need to stress that is a major component of overall census enumeration because the 2020 AR-based research suggested there was about a 20% undercount of non-citizens in Census 2020 even though there was not a citizenship question or the level of immigration enforcement that we are currently witnessing.

Whether or not these factors that generate differential non-response (and consequent differential undercount) persist is unclear—but Latino Survey research expert Matt Barreto argued that whether or not enforcement practices remain unchanged up through 2030, the effects will linger and will exacerbate the negative impact of the citizenship question.

Supporting Statement A for the endeavor (OMB Control Number 0607-1029) does not have adequate detail to make it clear whether or not the HTOP team has carefully reviewed what has been learned from the 2019 citizenship question test, from the experts' testimony and research included in the litigation about adding the citizenship question in 2020, or the Experimental AR-based 2020 Census or, for that matter, from CBAMS research in prior decennial censuses.

Therefore, I will highlight some crucial analytic issues that emerge from that research in my suggestions about data analysis and reporting from the Census 2030 Planning Survey.

An important consideration in the reporting of findings from the Census 2030 Planning Survey incorporated into HTOPS is whether quantitative analysis is adequate to generate actionable guidance for planning efforts to minimize differential non-response. This is especially concerning since it is reasonable to expect that adding a citizenship question will dramatically suppress responses in large sub-populations of households.

These do not simply include immigrants who lack legal status. It also includes immigrants (referred to by Brown and his team as being of “unknown” legal status, households of mixed legal status, and, quite possibly even households consisting entirely of naturalized citizens. Analytically it will be important to recognize that census response by the head of household for census purposes (i.e. P1) will affect enumeration of everyone residing at a particular address. I estimate that about 10 million households are at risk of response suppression, in large measure, as a consequence of aggressive immigration law enforcement, rhetoric and messaging designed to encourage self-deportation and the view that non-citizens should not be enumerated.

A basic and important consideration is market research and planning of survey research is to abandon the search for a single suite of “best messages” and messaging dissemination strategy but, rather, to be prepared to design and disseminate varying messages to defined audience segments. The CBAMS research, for example, was well-designed in order to try to provide actionable insights about this. An overarching recommendation is that the analysis be configured to address this objective.

However, it is also clear that quantitative research cannot stand alone in providing sound guidance about overcoming psychological and other barriers to census response and to maximize willingness to respond.

I strongly recommend that the Census 2030 Planning Survey be acknowledge as being simply one component of a broader mixed-methods ongoing research planning process as factors affecting non-citizen response evolve.

My own research in 2018-2019 to examine likely impacts of adding a citizenship question in 2020 in a region with concentrations of Latino immigrants (Kissam et. al, 2019, Wadsworth et al 2019) used a mixed-methods approach and yielded important, and sometimes unexpected, findings about factors entering into a hard-to-count population's willingness to respond to a traditional census or a census with a citizenship question. Although our in-person interviewing was relatively expensive per encounter, it generated responses that included answers to crucial open-ended questions about motivation and clues to effective messaging to promote response.

Weighting To Ameliorate Sample Bias in Survey Response from Hard-to-Count Households and Census Tracts

Simple weighting to conform to the ACS-based demographic profile of the U.S. population and population characteristics is very problematic in smaller analytic cells (e.g. counties, or even tracts). Intra-state variation in self-response (measured at either the community or county level) varied more than inter-state variation in 2020.

Colleagues' and my data analysis of patterns of tract-level self-response in Los Angeles and Fresno counties (Robinson, Kissam, and O'Hare 2023; Kissam and Robinson 2023) provided strong evidence that a number of "structural" factors of local community context were better correlated with census self-response than race/ethnicity (which was, indeed, correlated, but not as well as other factors). Reporting would ideally look at differences in response propensity at the PUMA level.

This implies that weighting to address sample bias in the Census 2030 Planning Survey should not simply seek to weight to account for demographic factors but should also account for other determinants of non-response that are particularly powerful in communities (and clusters of tracts) with relatively high proportions of low-income Hispanic non-citizens.

Table 1 in the Robinson, Kissam and O'Hare 2023 paper shows that, in addition to Hispanic ethnicity, the following tract-level ACS-derived factors were correlated with non-response: California HTC Score (similar to the Census Bureau's LRS score), % renters in tract, % non-high school graduates, % linguistically-isolated HHs, % HHs in poverty, % HHs with broadband access. The analysis examined self-response patterns at the state level.

Our subsequent analysis of self-response patterns (Kissam and Robinson 2023) in Fresno County showed that % of non-citizens in a tract, and classification of the tracts as urban or rural were also powerful determinants of self-response.

Since the Census 2030 Planning Survey does not include response promotion and the respondent reimbursement of \$5 per interview is insignificant in contemporary society, it is worthwhile to give special attention to the role that broadband access plays in survey response for the HTOP panel as well as the role that % of linguistically-isolated households plays since it is not clear that provisions to accommodate limited-English respondents are effective.

There may already be plans for multi-variable weighting of Census 2030 Planning Survey data but, if not, I strongly recommend weighting based on known correlates of census non-response and the additional considerations stemming from panel recruitment. Subsequently, analysis and reporting of findings should highlight geographic, socioeconomic, and sociopolitical variations.

Report Breakout for Factors Affecting Non-Citizen Response

Since non-citizens, especially Latino non-citizens are at high-risk of response suppression stemming from anti-immigrant rhetoric, aggressive detention tactics, and utilization of administrative records for tracking and detention in enforcement, it would be valuable to include a distinct analysis of factors affecting this very large sub-population's response and recommendations for ameliorating response suppression. This report should include frequencies, cross-tabulations, and analyses for all questions for the sub-sample of non-citizens.

Analysis of Specific Questions on the Census 2030 Planning Survey

It is good to see that the questionnaire includes a number of questions relevant to non-citizens' willingness to respond to the census. They seem relevant and well-framed.

However, some of the questions essentially presume a homogenous U.S. population while, in fact, many immigrants, especially the most recently arrived, may be unfamiliar with issues.

Responses for several questions that presume some level of knowledge about U.S. institutions or, in some cases, citizenship should be analyzed with particular care.

Responses to these questions (for both US citizens and non-citizens) should also be broken out by level of educational attainment (ideally by actual level of educational attainment as Grade 8 or less vs. Grade 9 or higher, not simply HS vs. college as in the Census Bureau's Planning Database).

- Affected variables include: **Qhearcensusaid**, **CenKnow**, for example.
- The coded responses for **TrustFs** do not seem to include a pre-coded response for skipped or don't know. Analysis should, nonetheless, report frequency of skips for this question since many immigrant respondents might well feel they have no basis for assessing "statistics in the U.S."
- **Use 4** (use of census for property tax) should be broken out for renter and homeowners. Renter are unlikely to be aware of this.
- Responses to questions media1-1 through media4-2 should be broken out for limited-English vs. primary English-language speakers to provide an initial sketch for dissemination of messaging.

In general, decennial census promotion has relied too much on mainstream media (which does not reach the sub-populations least likely to respond to the census).

Effective census promotion messaging to ameliorate non-response from households with non-citizens and other known hard-to-count group should include extensive follow up exploration of

media use in these sub-populations. The current survey can at least provide an initial assessment of the extent of non-English messaging needed and clues for effective messaging to less-literate respondents who are part of the hardest-to-count groups.

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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



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.

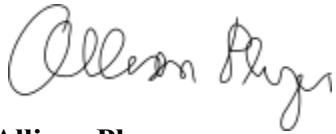
By addressing the risk of nonresponse bias, the Census Bureau can help ensure that the Household Trends and Outlook Pulse Survey fulfills its mandate to provide credible and high-quality data for decision-making.

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

Author Full Name : Adeline Wilcox

Received Date : 09/17/2025 02:13 PM

Comments Received :

The 2030 Census Planning Survey, appears not only underpowered by design, but designed to elicit positive attitudes towards the 2030 Census. Recommend this survey be redesigned with a frame defined by In-Field Address Canvassing only. Door-knocking only contact mode.

Author Full Name : Deborah Stein

Received Date : 09/17/2025 11:08 AM

Comments Received :

Attached please find the comments of the Coalition on Huma Needs.