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November 15, 2022

Ms. Shannon Wink
Program Analyst
Policy Coordination Office
U.S. Census Bureau
4600 Silver Hill Road
Washington, DC 20233

RE: Comments on Soliciting Input or Suggestions on 2030 Census Preliminary Research, Docket No: 2202-0004

Submitted via *regulations.gov*

On behalf of First Focus on Children, a bipartisan children's advocacy organization dedicated to making children and families a priority in federal budget and policy decisions, I am writing to offer comments on the 2030 proposed solicitation of input on 2030 Census Preliminary Research in response to the August 17, 2022 *Federal Register* notice.

First Focus on Children is proud to co-lead the Count All Kids Committee, which was formed by national, state, and local children's organizations and allies who joined together to ensure our nation's children were counted in the 2020 Census. The committee continues to work to raise awareness among the public, advocates, allies, and policymakers, and to identify opportunities to improve the count of children in each Decennial Census as well as other data that the Census Bureau provides on children – especially young children.

Implications of the Undercount of Young Children

Mandated by the Constitution, the goal of the census is to count every person, regardless of citizenship status, in all our communities once and only once, and collect basic information about them in a secure, convenient, and confidential manner. Historically and deeply troubling, the Decennial Census has undercounted children, especially young children. In addition, Census Bureau surveys, such as the American Community Survey (ACS), also under-report young children. Children under five are especially likely to be missed if they live in complex or multi-family homes, live with grandparents or other relatives, are poor and/or experiencing homelessness, move frequently, are children of color, or are linguistically isolated. Given the importance and far-reaching impact of the Decennial Census on distribution of federal resources, we strongly urge the Census Bureau to conduct research now to help ensure we can take action to accurately count children in 2030, especially as we know the underinvestment in our children and grandchildren means we will see rising rates of child poverty, increasing numbers of uninsured children, more children left hungry and homeless, and an increase in the number of kids living in high-stress and under-resourced households. Improving the fair and accurate count of children will help to ensure federal resources are allocated more effectively so that every child receives the resources they need to learn, grow, and thrive.

Despite efforts by the Census Bureau to address the challenge of counting kids in 2020, analysis of the agency’s data by Dr. William O’Hare for the Count All Kids committee finds that the 2020 Decennial Census net undercount rate for young children increased between 2010 and 2020: from 4.6% in 2010 to 5.4% in 2020. This is the highest net undercount rate for young children since 1950 when tracking started. Preliminary data from 2020 also suggests the gap between non-Hispanic white children and minority children (Black and Hispanic) is bigger in 2020 than it was in 2010. This raises a question of equity: Many of the children most in need of assistance are the least likely to get their fair share.¹ This undercount of young children is seriously troubling as census data guides the allocation of more than \$1.5 trillion in federal funding to over 300 programs, many of which help to support the healthy development of children and keep our most vulnerable children and families from falling into poverty.² These important federal resources support a broad range of programs and policy objectives, including Children’s Health Insurance Program (CHIP), Medicaid, Preschool Development grants, the Child Care and Development Fund, Foster Care and Adoption, Title I education, Special Education Grants (IDEA), nutrition assistance, clean water, energy assistance, safe and affordable housing, juvenile justice, child abuse and neglect protection, youth training, and more.

The distribution of this sizable amount of federal resources across numerous and diverse government programmatic areas is complicated and varies by agency and program. When the census undercounts children, especially young children and those who would benefit significantly from the federal funding, the allocation of federal resources is misguided, underscoring the importance of fixing the undercount of kids in census data to help ensure the fair distribution of federal funding. Accurate data is essential to ensure that federal funds are reaching all eligible children because we know that investment in childhood development leads to positive near- and long-term outcomes for our kids and grandkids — including better health, higher graduation rates and earning potential, and increased opportunities for parents to participate in the workforce — benefitting society and our economy as well.

The 117th Congress started its session strong by passing the American Rescue Plan Act (ARPA), which included incredible investments for children. As a result, FY 2022 set a record in the share of spending for children in the federal budget: 11.98% percent of federal funding went to children, compared to the historic low of 7.47% in FY2020. Census Bureau data showed that these investments led to the lowest child poverty rate on record for the United States. However, our analysis shows that lawmakers are currently paring back these investments and are on track to reverse the progress made, particularly the gains achieved under the ARPA. For instance, funding inflation-adjusted dollars for children dropped over 17% between FY 2021 and FY 2022.³ Children do not get their fair share of the federal budget, underscoring the importance of a fair, equitable Decennial Census that is successful in all communities and accurately counts our nation’s youngest because it could have a meaningful impact on the effective distribution of federal resources so children in need are not robbed of the support intended to help them thrive and reach their full potential.

Needed Messaging and Outreach

The Count All Kids Committee, through the leadership of the Partnership for America’s Children, worked with Lake Research Partners in 2020 to conduct focus groups with families with children to determine what messages resonated most to convince them to respond to the Census, and then worked with our network to

¹ O’Hare, Bill, “New Census Bureau Data Show Young Children Have a High Net Undercount in the 2020 Census,” 2022. <https://2hj.858.myftpupload.com/wp-content/uploads/2022/03/CAK-Report-on-Release-of-PES-and-DA-data-March-10-2022-FINAL-3-10-2022.pdf>.

² “Counting for Dollars 2020: The Role of the Decennial Census in the Geographic Distribution of Federal Funds,” The George Washington University, Institute of Public Policy, April 29, 2020. <https://gwipp.gwu.edu/counting-dollars-2020-role-decennial-census-geographicdistribution-federal-funds>.

³ “Children’s Budget 2022,” First Focus on Children, October 2022, <https://firstfocus.org/wp-content/uploads/2022/10/ChildrensBudget2022.pdf>.

create outreach materials using this messaging.⁴ We learned that loss of funding, especially regarding local resources, is very motivating to families to fill out the survey. One particular message that resonated with families was “your one-year-old child will be 11 years old the next time they are counted in the Census.”

Along with our Count All Kid Committee partners, the Partnership for America’s Children and the Coalition on Human Needs, we urge the Census Bureau to:

- Conduct focus groups of families with young children to determine the barriers that prevent them from responding and what messages overcome these barriers — for example, the Partnership for America’s Children’s research showed that families were concerned about the release of their data to private actors, particularly landlords. This was particularly true for larger families, which is also a situation where young children are more likely to be missed.
- All quantitative communications research should break out the analysis by families with and without young children to better understand how families with young children vary from other kinds of respondents.
- Increase partnerships with entities serving children — child care centers, home visiting programs, food and diaper banks, WIC clinics, and more. We appreciate efforts made by the Census Bureau in 2020 and hope these efforts expand in 2030, especially since COVID-19 will hopefully no longer prove to be a barrier to reaching these families in-person in these settings.

Data and Research to Address the Undercount of Young Children

Along with our Count All Kid Committee partners, the Partnership for America’s Children and the Coalition on Human Needs, we urge the Census Bureau to:

- Conduct more research on using blended base/administrative records to improve undercount and amend responses, as well as improving the Post Enumeration survey’s accuracy for young children, including by race and ethnicity.
- We recommend that the Bureau research the implications of using administrative data for counting people of color, since young children of color were missed at double the rate of white children in 2010. In particular, we ask the Bureau to research whether each source of administrative data is more or less likely to leave out people of color, and to identify multiple sources of data that get at all demographic groups.
- In preparation for the 2030 Census, the Census Bureau should fully evaluate the new methods used in the 2020 Census to improve the count of young children, to determine whether they should be repeated in the 2030 Census. We ask the Bureau to conduct evaluations of each of the changes in the final operational plan⁵ to increase the count of young children and, where research shows they were productive, to include them in the 2030 plan.
- Document how much federal funding for children is allocated using Census data and indicate the agencies using the data, the funding level associated with each agencies’ allocation process, and how often the data is used to update an agencies’ allocation process. This way, advocates can have better

⁴ “Counting All Kids: What We Learned from Focus Groups About Developing Creative Materials,” Count All Kids Committee, March 2020, <https://countallkids.org/resources/counting-all-kids-what-we-learned-from-focus-groups-about-developing-creative-materials/>; “Census 2020 Messaging Testing Results for Young Children,” Count All Kids Committee, February 2020, <https://countallkids.org/resources/census-2020-messaging-testing-results-for-young-children-2/>.

⁵ Deborah Stein, “Updated Census 2020 Operational Plan Pays More Attention to Counting Kids, Count All Kids Committee, February 2019, <https://countallkids.org/updated-census-2020-operational-plan-counting-kids/>.

data to engage particular communities in Census outreach, such as child care providers or home visiting programs or Head Start staff.

- Continue to have people on the National Advisory Committee and the Census Scientific Advisory Committee that represent the interests of young children.
- The Census Bureau should quickly update studies on young children based on the 2010 Census to include 2020.
- Assess at the substate level of the 2020 Census where young children were missed most often, and what geographic factors correlate with high levels of missing young children. As part of the substate research, the Bureau should research why, in the 2020 Census, response rates in predominantly Black and Hispanic tracts dropped. Recent research suggests that this was a significant problem.
- Conduct research on who used the online response option, who used the written response option, who used the phone option, and who responded during the Nonresponse Follow Up (NRFU) process, broken out by race, ethnicity, and presence of young children. We also remind the Bureau that lower income families (which are often missed in the Census) are less likely to have access to newer technology.

Highlighting Specific Populations of Children and Families

Families who Respond but Leave Babies off the Form

We know that a large reason that very young children are undercounted is because families with young children don't think they need to include their young children on their Census form,⁶ including babies who are born in the few months prior to Census reference day. This is a different problem than households who fail to respond at all, and therefore efforts to mitigate the undercount of young children, including targeted messaging and outreach to these families, needs to look different.

Along with our Count All Kid Committee partners, the Partnership for America's Children and the Coalition on Human Needs, we urge the Census Bureau to:

- Research changes in the count of young children between 2010 and 2020. For example, we ask that the Bureau assess whether the rate at which young children of color were left off even when families respond changed in 2020 compared to 2010, or whether the change in the count of young children of color was primarily due to lessened response rates in those communities.
- We also recommend that the Bureau research the option of using administrative records to identify young children missing from Census responses (as well as other missing family members) and add them to the individual household responses collected during self-response and NRFU. Since many young children are left off when adults self-respond, using administrative data to add children to individual Census records could be a good way to improve the count of young children.
- For children born in the few months before Census response day, we urge the Bureau to investigate the possibility of using social security data for those months since 2030 tax return data will not reflect the birth of children born that year.

⁶ O'Hare, Bill, New Census Bureau Data Shows that Young Children Have a High Net Undercount in the 2020 Census, Count All Kids Committee, March 2022, <https://countallkids.org/resources/new-census-bureau-data-show-young-children-have-a-high-net-undercount-in-the-2020-census/>.

We understand that the Bureau is researching the possibility of using state administrative data. In addition to SNAP, WIC, and TANF, which we understand the Bureau is already researching, we strongly recommend researching the possibility of using other sets of state records, including:

- Medicaid records: Nearly half of all young children are on Medicaid when they are born so these records should be an excellent way to supplement self-responses that leave young children off;
- Individual birth and death records: We know that the Bureau uses compiled birth and death records to assess Census accuracy; if it could use individual birth and death records to append young children to individual census responses it could improve the count of young children;
- School enrollment records;
- School meal records, and records of the Child and Adult Care food program that provides food for child care programs.

Children, especially young children, living in non-nuclear families or living in households where they are not closely related to the householder, or are non-related to the householder, are also more likely to be left off a Census form. This includes children living in multigenerational households, children being cared for by grandparents, children living with foster parents or in licensed kinship care, and children in split custody arrangements.

These caretakers might mistakenly believe that they should not include children in their care as of April 1st, 2023 on their Census form if they are not closely related to the child. It must be made clear to these families through targeted outreach and messaging that any child in their care as of April 1st who will not be counted elsewhere should be included on their household form.

Hard to Reach Families

Families with children who lack the resources for safe and stable housing are often highly transitory and forced to move frequently between living situations. Often these situations mean that a child may be “doubling-up,” or living temporarily in a household where they are not related to the householder or not on the lease. These situations are not rare — during the 2020-2021 school district, the U.S. Department of Education identified over 800,000 homeless public school students who were living in doubled-up situations.⁷

Children and families in these situations are at great risk of being left off by the householder filling out the Census form, either due to the mistaken belief that any non-related people should not be included as part of the household, or out of concern that including any people on the form who are not on the lease could get the householder in trouble with their landlord.

Specific and targeted messaging is needed for these situations that a) clearly communicates that any people staying with you as of April 1st, 2023 who would not be counted elsewhere should be included on the form and b) all information given to the Census Bureau is confidential and will not be shared with a landlord or any other third parties. We appreciate the effort made by the U.S. Census Bureau’s National Partnership Program to reach these households through partnerships with advocates and service providers working directly with children and families experiencing homelessness, and we ask for the Bureau to expand upon these efforts in 2030.

⁷ National Center for Homeless Education, “National Overview,” last accessed November 10, 2022, <https://profiles.nche.seiservices.com/ConsolidatedStateProfile.aspx>.

Families with children with no fixed address warrant special attention and creative outreach approaches to ensure inclusion in the Census, particularly those who are experiencing homelessness or living in motels or in their cars as of April 1st, 2023. These families are not likely to initially receive a form, and then it is very hard for Census enumerators to know their location for follow-up. The best way to identify and reach these children and families is through partnerships with community institutions, such as the school system where homeless student liaisons are working to identify students experiencing homelessness in their district, as well as child care centers.

Families with children in urban settings who are residing in apartment buildings are also at great risk of being missed because in-person enumerators are mistakenly not given access to buildings to follow-up with non-responder residents. There must be stronger guidance communicated to property managers and large corporate landlords that they are legally required to allow Census enumerators access to buildings. There could be opportunity to work with a group like the National Association of Residential Property Managers to help accomplish this goal.

Finally, low-income families with children in rural areas are also at great risk of being missed — it may be difficult for enumerators to cover all of the ground needed to reach all NRFU homes in rural areas, and mail delivery and broadband internet service are often less reliable so it may be difficult for households to receive the form, mail it back easily, or fill it out online. One potential solution could be to engage with other federal agencies with a large footprint in rural communities such as Rural Development at the Department of Agriculture and the Appalachian Regional Commission.

Children in Immigrant Families and Where English is Not the First Language

We know that in 2020, many immigrant households with children hesitated to respond to the Census out of fear of negative consequences for their own immigration status of themselves or the status of other family members. The Census Bureau must increase outreach and messaging efforts to these households and communities, working directly with trusted community partners, to communicate to families that all information on Census forms is completely confidential and will not be shared with any third parties, including immigration offices and officials.

In addition, because many children who are missed live in households where English is not the first language, we encourage the Bureau to expand the number of languages it makes the census form available in, and to also expand the number of resources that are available in each language online. This should include videos (designed to be easily viewable on mobile phones) so that people with limited proficiency in English can use the video to fill out the form and get questions answered. States and localities should be encouraged to disseminate the availability of these resources in languages that are used in their communities. We particularly note that materials in all languages need to explicitly state that babies and young children should be included.

We appreciate your consideration of our recommendations on ways to prioritize children as you plan for the 2030 Decennial Census and thank you for the opportunity to submit a comment. Please do not hesitate to contact Cara Baldari at carab@firstfocus.org or Michelle Dallafior at michelled@firstfocus.org for additional information.

Sincerely,

A handwritten signature in blue ink that reads "Bruce Lesley". The signature is written in a cursive style with a large, prominent "L" in "Lesley".

Bruce Lesley, President
First Focus on Children