

September 18, 2023



Ms. Sheleen Dumas
Department PRA Clearance Officer
Office of the Under Secretary for Economic Affairs
U.S. Department of Commerce
1401 Constitution Ave., NW
Washington, DC 20230

Submitted via <http://www.regulations.gov>

Re: U.S. Census Bureau request for OMB clearance for the collection of data concerning the Survey of Income and Program Participation (SIPP) (FR Doc. 2023–15442, OMB Control No. 0607-1000)

Dear Ms. Dumas:

On behalf of The Leadership Conference on Civil and Human Rights, a coalition charged by its diverse membership of more than 240 national organizations to promote and protect the civil and human rights of all persons in the United States, and the undersigned organizations, we appreciate this opportunity to provide comments in response to the Census Bureau’s request for review and approval of changes to the U.S. Census Bureau’s Survey of Income and Program Participation (SIPP), published in the Federal Register on July 20, 2023 (the “notice”). **We urge the Census Bureau to reconsider its recommendation to reduce the SIPP sample size and urge the Bureau to instead identify adequate fiscal resources to preserve the future of this vital measure of household economic health and stability.**

The Leadership Conference is the nation’s oldest, largest, and most diverse civil and human rights coalition and provides a powerful unified voice for the many constituencies we represent. Our coalition views the collection of useful, objective data about our nation’s people, housing, economy, and communities to be among the most important civil rights issues of our day. Our longstanding role as a Census Information Center has allowed us to lift up within our broad civil rights coalition the fundamental importance of comprehensive, high-quality data about our population, communities, and economy.

SIPP is a critical benchmark of economic well-being in American households. As the Census Bureau noted in its congressional budget justification for Fiscal Year 2024, “SIPP is crucial to the measurement of the effectiveness of existing federal, state and local programs. The data are used to estimate eligibility, use, future costs, and coverage for government programs such as food stamps, and to provide improved statistics on the distribution of income in the country.”

In addition to being “the best source for the information needed to determine eligibility for and receipt of transfers”, SIPP is the leading and often only federal source of survey data on key topics such as the interplay between household economics and marriage or divorce; what happens to family members who

move away from one another; households' cumulative material hardships such as food insecurity and inability to pay rent, mortgage, or utility bills; Americans' economic experiences over periods of three or four years; month-to-month household income dynamics including extreme "\$2-a-day" poverty; and detailed family relationships within multi-family households.¹

Equally important, the longitudinal data SIPP provides are essential to understanding how life's situations are interconnected, cumulative, and affect economic stability. Census Director Robert Santos, in remarks at the SIPP Virtual User's Conference in April 2023,² gave a more complete picture of SIPP's importance, based on his 40 years of distinguished research, and we cannot improve on his observations:

What patterns lead folks in need to overcome life's obstacles? Whether it's shelter, food, employment, or even the justice system. Well, to understand that, to gain real insight, you need ... longitudinal data. You need to look at the trajectories over time of the situations people in need find themselves how they attempted to navigate them, and the extent to which problems were mitigated. You need to be able to see that problems are not siloed: Life's situations are necessarily interconnected. Unemployment is associated with education, which is associated with hunger, and health, and housing, and safety net eligibility, and so on. So, we not only need to see trajectories over time but also the interconnectivity of all the things that allow us to live a life. And guess what: SIPP provides the longitudinal data that can help us understand people's and families' trajectories, as well as the interconnectivity of various life aspects, which we call policy areas. Hey, it took me the better part of my career to develop this perspective and to appreciate the ability of a program like SIPP to help us understand this landscape and find ways to improve society.

The Census Bureau's proposal to implement a permanent 34 percent cut to the survey's sample size raises serious concerns. Such a cut would likely reduce data quality, and coupled with the steep decline in the SIPP response rate — from 68 percent for the 2017 panel to just 37 percent in 2022 — could increase nonresponse bias. Moreover making permanent the 2023 reduction in SIPP's sample size — from 53,000 housing units to just 35,000 — would noticeably decrease the reliability and usefulness of SIPP data, with a substantial impact on the survey's ability to produce meaningful comparisons and to distinguish between demographic or geographic subgroups such as Hispanic, Asian, same-sex couples, or non-metropolitan (rural) households.

While we are painfully mindful of both falling survey response rates and fiscal constraints on all Census Bureau programs, SIPP is too valuable a measurement of household economic health and challenges to sacrifice with such a significant cut to the sample size, especially without an alternative source for comparable, reliable data. Therefore, we urge the Census Bureau to reconsider the reduction in the SIPP

¹ Bruce D. Meyer, Wallace K. C. Mok, and James X. Sullivan, "Household Surveys in Crisis," *Journal of Economic Perspectives*, Volume 29, Number 4 (Fall 2015), pages 1–29.

² <https://www.youtube.com/watch?v=8hCq78YyapY>.

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panel size and, instead, to take steps to secure the future of this crucial measure of economic well-being and source of information to guide policy decisions affecting vital economic support programs.

Thank you for your consideration of our concerns and views. Please direct any questions about these comments to Meeta Anand, Senior Director, Census and Data Equity at The Leadership Conference (anand@civilrights.org).

Sincerely,

The Leadership Conference on Civil and Human Rights
Alliance for Retired Americans
Arab American Institute (AAI)
Asian Americans Advancing Justice | AAJC
Association of Population Centers
Center for Law and Social Policy (CLASP)
Coalition on Human Needs
Equality California
Georgetown Center on Poverty and Inequality
Government Information Watch
Health Care for America Now (HCAN)
Japanese American Citizens League
Lawyers for Good Government
League of Women Voters of the United States
Movement Advancement Project
Nation LGBTQ Task Force Action Fund
National Association of Latino Elected and Appointed Officials (NALEO)
Educational Fund
National Association of Social Workers
National Disability Rights Network (NDRN)
National LGBTQ Task Force
National Organization of Social Security Claimants' Representatives
(NOSSCR)
National Partnership for Women & Families
National Urban League
NETWORK Lobby for Catholic Social Justice

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PFLAG National

Population Association of America

Project On Government Oversight

Service Employees International Union (SEIU)

Silver State Equality

Tzedek DC

Union of Concerned Scientists

Whitman-Walker Institute

Women Employed

ZERO TO THREE