

Response to the FRN seeking research suggestions for the 2030 Census: these comments are submitted on behalf of the undersigned organizations, which advocate for or serve children.

We commend the Bureau for its work in 2020 on improving the count of young children. In particular, we applaud the responsiveness to children's advocates concerns when they provided information and research, commend the decision to include in the advertising campaign information about the need to count everyone in the household, and applaud the Bureau for greatly increasing the focus on young children in its final operational plan.

We were deeply disappointed that despite the significant efforts by the Bureau and the children's community, the count of young children was even worse in 2020 than in prior years. These comments suggest steps that would further the improvements made in 2020 and suggest new approaches that could also help.

Because we include many recommendations, we list the five most important recommendations here.

- 1) Explore using Administrative Records to add young children to 2030 census responses where they are left out.
- 2) The 2030 Census communication campaign should include messages about the need to include young children in the Census returns.
- 3) The Census Bureau should continue to have people on the National Advisory Committee and the Census Scientific Advisory Committee that represent the interests of young children.
- 4) The Census Bureau should use the 2030 Census Barrers and Motivator Study (CBAMS) to get more information about why young children are often left out of the Census.
- 5) The Census Bureau should quickly update studies on young children based on the 2010 Census to include 2020.

As a preface to these comments, we note that important research has been conducted on why young children are missed, and our comments below are intended to help address some of these factors.

These factors include:

- Children under age five living in families with incomes below 100% of the poverty level
- Adults ages 18 to 34 with less than a high school diploma or GED
- Children under age 18 living in female-headed households with no spouse present
- Children under age 6 living with grandparent householders or other nonparents
- Households that are limited English speaking
- Children under age 6 living in immigrant families
- Population living in renter-occupied housing units
- Children who were Hispanic or people of color
- Children living in complex households, defined as all households other than nuclear families, stem families (i.e., single-parent families), and single-person households
- Very young children (those born in the few months prior to the census reference day)
- Children living in the largest and the smallest households
- Children not enumerated by self-response.

Young children were missed because of different types of error, such as the housing unit was missed, the entire household was missed, and part of the household or just the child was missed. Whole-

household errors were more common for biological and adopted children while partial-household errors were more common for grandchildren, other relatives, and nonrelatives of the householder.

As requested, we have addressed the specific topics the Bureau suggested in A through E (omitting D). We also included an additional section, F, which includes other suggestions.

A. *Reaching and motivating everyone.*

1. We recommend the Bureau continue its efforts to make sure not just that every household is reached but also that everyone in the household is counted; the Bureau's own research and research by the Partnership for America's Children both indicate that many young children are left off census forms even when households respond.
2. To better plan for 2030 Census outreach, the Census Bureau should update past studies on young children quickly. Between 2016 and 2019 the Census Bureau Research Task Force released 13 detailed research reports and a summary report on the undercount of young children in the Census. These reports found numerous patterns in the 2010 Census related to the coverage of young children and offered some ideas about how to conduct the 2020 Census to achieve a more accurate count of young children. The Census Bureau should quickly update these studies to include 2020 so the results can be incorporated into early planning for the 2030 Census cycle.
3. We recommend that the Bureau 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.
4. Research conducted by the Partnership for America's Children suggested that the single biggest motivating force for getting families to respond was the impact of accurate data on improving funding for their children. This was also a powerful message for persuading policy leaders and other stakeholders to engage in outreach activities. Therefore, we recommend the following:
 - a. The CBAMS focus groups, survey, and other communications research efforts should test which kinds of funding undercounted communities care about. Partnership research with families with young children showed that in addition to programs that are generally considered to be children's programs, such as schools, families with young children are very concerned about funding for housing and transportation.
 - b. Collect stories that show how improved counts in communities made them eligible for more funding for children's programs.
5. Document how much federal funding for children is allocated using Census data.
6. We recommend that the Bureau research changes in the count of young children between 2010 and 2020. For example, 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.
7. 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 plan, described here <https://countallkids.org/updated-census-2020-operational-plan-counting-kids/> to increase the count of young children and, where research shows they were productive, to include them in the 2030 plan.

8. We recommend that the Census Barriers Attitudes and Motivations (CBAMs) communications research include the following.
 - a. Focus groups just with families with young children
 - b. The focus groups and survey should ask whether families would include their young children, why or why not, and what messages would persuade them to include their young children.
 - c. The communications research should also investigate the barriers to responses with more detail, and what messages overcome these barriers. For example, the Partnership'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.
 - d. Communications research should also investigate what terms to use to make sure babies are included. Partnership for America's Children's research suggested that for many people the term young children did not include babies, and that it might be important to say babies, infants, toddlers, and preschoolers, or from birth on.
 - e. One message to test that advocates found resonated with families, was "your one-year-old child will be 11 years old the next time they are counted in the Census."
 - f. 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.

B. Technology.

1. Avoid excessive reliance on newer technology. Recent research (Robinson et al. 2022) suggests that while self-response rates in census tracts where Non-Hispanic Whites are the majority populations and easy to count groups are prevalent increased in the 2020 Census compared to the 2010 Census, self-response rates in census tracts where historically undercounted groups were the majority population were lower in 2020 than in 2010. It is possible the introduction of the internet led to wider differentials in the 2020 Census than were seen in the 2010 Census. The evidence indicates self-response rates decreased in census tracts where Blacks and Hispanics were the majority population and Black and Hispanic young children have much higher net undercounts in the census. Accordingly, we ask the Bureau to research 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.

C. New data sources.

1. We recommend that administrative records be used as a back-up measure when households cannot be counted, or to complete information on who lives in the household, but they should not replace self-response or NRFU efforts. We know that self-response is generally the most accurate response, and we know that administrative records use a variety of different definitions of household members, so using administrative records instead of self-response and enumerator interviews could result in less accurate results.
2. We 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.

3. 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.
4. We recommend that the Bureau research the following options for administrative data:
 - a. We urge the Bureau to research federal administrative data sources that might include babies born in the first three months of the Census year, since tax returns available in 2030 will not include children born in 2030. We urge the Bureau to investigate the possibility of using social security data for those months.
 - b. We understand that the Bureau is researching the possibility of using state administrative data.
 - i. 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.
 1. 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.
 2. 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.
 3. School enrollment records.
 4. School meal records, and records of the Child and Adult Care food program that provides food for child care programs.

D. *How We Contact Respondents—we are not submitting comments on this question.*

E. *Respondent support services.*

1. The Bureau should partner with child care centers to help them provide census support at drop-off or pick-up.
2. Child advocates used early childhood home visiting programs to reach families with information about the importance of the Census. These programs often reach hard to reach communities and can provide support to respondents.

F. *Additional Considerations*

1. The Census Bureau should make sure the National Advisory Committee and the Census Scientific Advisory Committee have members representing and knowledgeable about the interests of young children throughout the decade. They can provide valuable input into the 2030 Census planning process.
2. The roles of State and Local Complete Count committees were very important in building stakeholder engagement in census outreach in advance of the Census but they were not given sufficient support on how to improve the count of young children.
 - a. The Bureau's recommendations for Complete Count Committees should include information about strategies for reaching undercounted groups specifically including young children.

- b. The Bureau should also encourage states to appoint at least one person familiar with the 0-5 population to each statewide Complete Count Committee. If possible, the Bureau should also provide funding for Complete Count Committee work.
3. 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.
4. In each state, the Census Bureau should have a Partnership Specialist who is specifically dedicated to the population of young children. One state had a Partnership Specialist dedicated to reaching this population, and she put together a very effective toolkit and did a lot of outreach to families with young kids and caretakers of young kids. A neighboring state had great Partnership Specialists, but none were specifically dedicated to young kids, and child advocates struggled to get the same momentum.

Thank you for this opportunity to comment.

Name of Organization:

Advocates for Children of New Jersey
Arkansas Advocates for Children and Families
Children Now
Church World Service
Citizens' Committee for Children of New York
Colorado Children's Campaign
Community Action Partnership of Sonoma County
DC Action
Futures Without Violence
Hispanic Federation
In Reach, Inc.
Island Harvest Food Bank
Let's Grow Kids
Meals on Wheels California
Metropolitan Interfaith Council on Affordable Housing
Michigan Council for Maternal and Child Health
Musikanten
National Association for the Education of Young Children (NAEYC)
National Association of Counsel for Children
National Prevention Science Coalition
National Women's Law Center
nhhc.org (National Health Care For the Homeless)
OrgLearning2 LLC
Parent Possible
Parent Voices Oakland
Parents as Teachers

Partnership for America's Children
Pennsylvania Health Access Network
Pennsylvania Partnerships for Children
Public Justice Center
SELF
The Children's Center of Cicero Berwyn
Think Babies Michigan
Walla Walla Valley Early Learning Coalition
Women Employed
ZERO TO THREE