August 24, 2018

Office of Management and Budget
Paperwork Reduction Project
725 17th Street NW
Washington, DC 20503

Attn: Desk Officer for the Administration for Children and Families

Re. DHHS, ACF, Submission for OMB Comment Request on Childhood and Family Experiences Study, 83 Fed. Reg. 35275 et seq., July 25, 2018

As members of the U.S. Child Poverty Action Group, a partnership of national child-focused organizations dedicated to cutting the U.S. child poverty rate in half within a decade, we are writing to offer comments on the Childhood and Family Experiences Study in response to the Federal Register Notice filed on July 24, 2018.

The U.S. Child Poverty Action Group undertakes our work through raising awareness, building political will, and advocating for policies proven to reduce child poverty. We strive to be a resource for dedicated lawmakers, media outlets, and advocates fighting on behalf of children in poverty. In addition to our advocacy work, many of our members conduct research on issues related to child poverty in order to build a foundation of evidence to support our policy recommendations.

Given this mission and our collective experience, in a spirit of collaboration, we are writing to express our concerns and offer recommendations on the Childhood and Family Experiences Study.

While we are supportive of additional data collection to inform policymaking around the experience of families receiving public benefits, we have significant concerns about the methodology of this survey. The small sample size, lack of clear recruitment plan for respondents, and potentially stigmatizing questions in the survey will impede the study’s ability to capture the true experience of families with children who receive these benefits.
**Introduction**

Nearly 1 in 5 children in the U.S. live in households with incomes below the poverty line. Children experience poverty at a rate that is 62.5 percent higher than that of adults. Put another way, children make up 23 percent of the U.S. population but account for 33 percent of the population living in poverty.¹

While child poverty remains high in the U.S., it would be much higher without effective anti-poverty programs. The Supplemental Nutrition Assistance Program (SNAP) combats hunger and lifts 1.5 million children out of poverty annually, while the Earned Income Tax Credit (EITC) and Child Tax Credit (CTC) together also lift nearly 4.5 million children out of poverty.²

Child development research shows that kids benefit from resources provided at an early age – and that those resources create a long-term positive impact on the child’s life, regardless of family’s socioeconomic status. For example, children in families who accessed the EITC and CTC have higher educational attainment and are likelier to earn more as adults.³

In most low-income households with children, there is at least one family member who is working. Yet due to low wages, skyrocketing rents and the high cost of everyday goods, parents still struggle to make ends meet. As a result, they turn to key assistance programs to supplement resources for their families.

As families are working towards upward mobility, we must ensure that they can provide sufficient resources for their children while their brains are undergoing critical stages of development. Strengthening programs such as the Temporary Assistance for Needy Families (TANF) program would ensure every family has access to the cash assistance they need to make ends meet while they strive for economic security.

**Concerns about Study Methodology**

This study has the potential to offer useful insight into the experiences of families with children receiving public benefits, which could inform policymaking efforts to improve the reach and delivery of these programs. However, we have significant concerns about the study’s methodology.

Our primary concern is that the sample size of 30 families across 3 communities is too small to draw any conclusion about the target demographic with any meaningful degree of confidence. A

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sample size this small cannot accurately capture the diverse uses of these programs or the diverse experiences of program participants, including their different geographic, regional, and macro-economic contexts.

In our nation of 326 million people, 46 million live on incomes at or below the federal poverty level. The country’s population spans 50 states and 39,000 municipalities. A survey sample of approximately 95 people from just three communities is simply too small to be representative, limiting the researchers’ ability to draw any sort of meaningful conclusion about the challenges of poverty for the broad population experiencing it. Indeed, the study statement itself acknowledges that “This amount of representatives will provide a diverse, but not representative, sample. . . . One limitation of the qualitative study design and small sample size is that results may be difficult to generalize beyond the parents and children interviewed.” (Supporting Statement A, 5).

The chosen methodology for this study is inappropriate given the scope of its research goal of “A more holistic understanding of children and families’ experiences living in poverty within and outside of the programmatic sphere.” (Supporting Statement A, 4). The analysis plan suggests that there will be sufficient data to “uncover themes across households.” However, the data set is likely too small to uncover any but the most superficial themes, as this sample size would prohibit researchers from drawing statistically significant conclusions about subgroup responses. While the entire sample is sufficient for a 90% confidence rate with a margin of error of 8 for hypotheses about people living in families in poverty generally, any subdivision of the sample into any represented groups (e.g., children, adolescents, and adults; urban, suburban, and rural; or single parent families, dual parent families, and multigenerational families) is too small to make any findings with external validity. As the small sample group is further divided to account for different demographics, family structures, geographic location, and other subdivisions, these subdivided groups become even less representative of the subdivided population they are supposed to represent.

The small number of locations will also make finding any definitive conclusion regarding geographical distinctions difficult. The supporting statement notes that one question the study seeks to answer is whether perceptions of poverty differ by geographic region or metro/non-metro region. But with only three locations, it is impossible to attribute any differences in the perception of poverty to regional differences over other characteristics. The number of locations is too small to include a location in each of the ten federal regions identified by the U.S. Office of Management and Budget (OMB), or even the four regions identified by the U.S. Census Bureau. In short, this study will likely result in the collection of stories of a small number of individuals living in families in poverty, and little else.

There is a real danger of ignoring these limitations in the search for unifying “themes” among the interviews. The small sample raises the possibility that anecdotal information will be cited as evidence of a larger truth applicable to a generalized population by agency officials, without the proper context and necessary caveats regarding the study’s statistical limitations. Although the researchers confess that it may be difficult to generalize beyond the subjects interviewed, that acknowledgment does not prevent others with access to the study from doing just that and applying unscientific conclusions to policy decisions that will affect the entire population, not
just the interview subjects. Indeed, the stated purpose of the study is to “inform future directions for the field,” (Supporting Statement A, 4), and to share such conclusions with “other federal agencies, researchers, policymakers, program operators, and practitioners.” (Supporting Statement A, 4). As the research is shared further and further from the source of the study, the likelihood for misinterpretation of the data increases as well as the substitution of anecdotal perceptions for solid, scientifically collected evidence.

We are also concerned that the study statement does not address the plan for recruitment. The study statement provides the barest of criteria for consideration of families, and relies on vague language rather than outlining a recruitment plan. The study statement stresses the desired diversity of the subjects, if not their representational value, but there is no strategy as to how to obtain that “diversity” or even what “diversity” looks like. The statement provides no recruitment strategy other than “the research team expects to work with local social service agencies to identify and reach out to possible sample participants.” There is no discussion of what type of social service agencies will qualify, how the selection process works, and whether or not researchers will rely on multiple agencies within a given location.

There are few criteria for selecting families beyond the condition of deep poverty (defined as having incomes of less than 50 percent of the federal poverty level). The plan also states that race and ethnicity and languages spoken at home will be considerations in selecting families in order to obtain the desired diversity. Will researchers preselect families or open recruitment to volunteers from the agency? Preselecting families opens the possibility that the researchers will be predisposed (even if unconsciously) to select families who are most likely to support their hypotheses for this research before the first question is asked. Involving social service agencies in the determination of which families to recruit could further lead to selection bias in the development of the survey sample.

The site selection will “consider policy, programmatic, and geographic characteristics along a number of dimensions that may influence those experiences”, but there is no discussion of what are the “characteristics” being considered, nor the “dimensions” that may influence them. Will the three locations represent one each of metro, suburban, and rural areas? And if so, how are those terms defined? Will the three locations represent different regions in the country? How will the three regions be selected? The OMB has established ten standard regions in Circular A-105. How will the researchers select which three are represented and which seven are not?

**Concerns about Survey Questions**

In addition to our concerns about the study’s sample size and recruitment strategies, we also have concerns about the substance of the survey questions. Many of the sample questions provided in Supporting Statement B ask adults and children about their feelings around their economic status and receiving public assistance.

Adults, adolescents and children may be reluctant to answer questions about public benefits based on the stigma often associated with poverty and receiving public benefits in our society.
For example, there have been bipartisan policy efforts\textsuperscript{4} to combat the practice of lunch shaming (punishing a student for school lunch debt) in public schools, and SNAP outreach coordinators still report challenges with enrolling eligible households due to stigma and misconceptions about the program.\textsuperscript{5}

In addition, members of a household may not always be aware of the specific benefits they receive or the source of these benefits, since navigating the public benefit system on the federal, state and local government levels (as well as those available from private non-profit entities) can be confusing. Many states offer a state EITC in addition to the federal credit, and states administering federal benefits often provide their own name for these benefits. The Temporary Assistance for Needy Families Program is called CalWORKS in California, Colorado Works in Colorado, and the Family Investment Program in Iowa. While this makes it difficult for families to often accurately identify the public assistance they are receiving (or eligible for), it doesn’t make these benefits any less effective.

We also remain concerned about potential survey questions that ask household members about their feelings on the economic status of their household. These questions run the risk of making respondents, particularly adolescents and children, feel sad, discouraged and/or stigmatized regarding their household economic status. In addition, family members, especially children, might shape their perception around where they fall on the “economic ladder” by comparing themselves to their surrounding community. This is especially true for adolescents and children, who often directly compare themselves to friends and peers. This dynamic is an important consideration when interpreting the responses of household members about their feelings on their household finances. This dynamic might not be as prevalent in rural areas where there may be fewer households for reference for families.

Another factor that shapes a family’s perception of household finances is that low-income families sometimes have income from sources other than public benefits, such as child support or earnings from employment. This other income is sometimes “disregarded” in setting their public benefits level and may reduce their public benefits. These factors can complicate a family’s understanding of their financial status.

Finally, many household situations are complex. Individuals may be living in the same household as other extended family members or sharing living arrangements and expenses with other non-biological/non-nuclear members. This includes families with children where there is shared parental custody, or children who may be living with other relative caregivers such as grandparents. Complicated household composition makes it tough for people to sort out their financial status, and it may be hard to quantify impact of benefits if questions assume firm boundaries around who is or isn’t in the household.

**Recommendations**


In order to ensure that this study is effective at capturing the true lived experience of families with children who receive these benefits, we make the following recommendations:

- The sample size for this study must grow for researchers to draw conclusions and answer research questions with any external validity. In addition, the recruitment plan must ensure racial and geographic diversity of respondents.

- Questions must avoid making adults and children feel stigmatized based on their household finances and any benefits they may receive.

- Local service providers or other trusted personnel should ask families questions, and the survey should be occur in a familiar location where a family feels comfortable. We encourage the utilization of county officials in this process, who are in a unique position to connect federal partners with local providers administering these programs.

- In addition to survey questions for children, adolescents and adults, there should also be a survey for local service providers. Service providers have valuable information related to what is effective in their community/to program participants.

- Questions must be clear and easy understandable for respondents, and respondents must receive upfront information regarding the data’s intended use.

- The survey should include additional questions in order to collect the following information:
  - Identify how benefit programs affect household financial decisions and the ability of families to meet household members’ basic needs;
  - Determine any barriers and challenges that households face to accessing benefits;
  - Discern any effect that public benefits have on parental/caretaker stress and positive child development.

- There should be at least one open-ended question to provide household members an opportunity to share what they think is needed for their household to reach self-sufficiency.

**Conclusion**

Public benefit programs provide an influx of resources for households that has both short- and long-term effects on child well-being, even when families rely on them for a short time. While we appreciate efforts to collect data in order to better understand the experience of households receiving public benefits, we are concerned that the current methodology will impede the study’s ability to capture the true experience of families with children who receive these benefits.
Thank you for the opportunity to submit these comments and please do not hesitate to reach out with any questions.

Sincerely,

Child Welfare League of America
First Focus
National Diaper Bank Network
Sargent Shriver National Center on Poverty Law
Save the Children Action Network