

September 17, 2025

CHN and PAC Comments to the Independent Census Scientific Advisory Committee

The Coalition on Human Needs and Partnership for America's Children are submitting these comments with gratitude for the opportunity to provide advice to the Committee which we understand will be available to Census Bureau staff on critical topics affecting the count of young children. Our organizations are two of the founders and members of the steering committee of [Count All Kids](#).

We have the following comments on the operational plan for 2030.

We appreciate that the Bureau has been working on developing new strategies for improving the count of young children. It is essential to test multiple new strategies since some may not work; therefore, we thank the Bureau for including the 2026 Census test in its operational plan and we urge the Bureau, if it must reduce the number of locations, to make sure that it can still test all the new strategies under consideration.

We are pleased that it includes as part of the effort to improve the count of young children considering "leveraging birth records and other administrative and supplemental data to augment collected response data." We agree that administrative records, particularly birth records, would be very valuable but we also appreciate that this is intended to augment and not replace response data. Wherever possible response data should be used since it will be the most current. It is also most likely to be accurate with respect to race and ethnicity because it will use the new SPD 15 standards while birth certificates will in most states not be updated in time to have accurate race and ethnicity for all young children.

We thank the Bureau for developing "models [that] will help inform the contact strategy for HUs[household units] that potentially have young children," but note that they must also test which contact strategies work.

We are pleased that the Bureau intends to continue its Non-ID response program and is cautious about its security; we remind the Bureau that at many addresses the householder may have left off residents who then file a non-ID response and that any security assessments of non-ID response must include counting legitimate doubled-up household members (especially since many young children live in such households).

We are disturbed that the plan has very limited attention to strategies for reaching people with low literacy skills, and seems to focus on language barriers and community outreach. We note that 20% of residents whose first language is English struggle with literacy at a very basic level¹ and young children are disproportionately missed in households where no adult has graduated from high school.² We believe that reaching these households requires the Bureau to 1) review all aspects of the form (directions and layout as well as questions) with literacy experts 2) test where people with low literacy receive information, such as radio, TV and online music, game, and other sites, and include outreach in English in those venues 3) provide information in those ads about how people can respond by phone in English and 4) make sure that the English language phonelines are adequately staffed.

We thank the Bureau for including demographic analysis of the undercount of young children by state and county in its plan.

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 and Marquita Little Numan at mnuman@foramericaschildren.org.

¹ https://www.thenationalliteracyinstitute.com/2024-2025-literacy-statistics#:~:text=what%20constitutes%20literacy,-%E2%80%8B,%E2%80%8B;https://nces.ed.gov/surveys/piaac/2023/national_results.asp .

² [State and County Net Coverage Error Estimates for Children Aged 0–4](#)