

SOCIAL IMPACT RESEARCH CENTER

A HEARTLAND ALLIANCE PROGRAM

Karen Battle
Chief, Population Division, U.S. Census Bureau
4600 Silver Hill Road, Room 6H174
Washington, DC 20233

November 8, 2018

Re.: Soliciting Feedback from Users on 2020 Census Data Products (83 FR 34111)

Dear Ms. Battle,

I am writing from the Social IMPACT Research Center at Heartland Alliance in Chicago, Illinois. Heartland Alliance, one of the world's leading anti-poverty organizations, works in communities in the U.S. and abroad to serve those who are experiencing homelessness, living in poverty, or seeking safety. Heartland Alliance provides a comprehensive array of services in the areas of safety, health, housing, education, economic opportunity, and justice—and leads state and national policy efforts which target lasting change for individuals and build towards a society of equity and opportunity for all. The Social IMPACT Research Center is a program of Heartland Alliance. IMPACT conducts research that helps leaders create change. We collaborate with clients to measure and grow their social impact. Our user-friendly work enables nonprofits, foundations, and governments to advance real-world solutions to poverty.

I am writing regarding proposals within this rule to revise the Census Bureau's procedures for ensuring the confidentiality of public use data. I have concerns that the proposed new disclosure avoidance system, which relies on injecting noise with formal privacy rules, would significantly reduce or even eliminate the usability of public use data for the research IMPACT conducts.

As part of our applied research, IMPACT regularly relies upon American Community Survey (ACS) and Census microdata in order to understand phenomena at geographies or aggregations that are not routinely published in Census or ACS summary tables. The flexibility provided by the microdata allows us to be responsive to unique program and policy questions and help decision-makers in Chicago and Illinois understand how to craft policies and distribute resources in a way that meets the needs of particular populations.

IMPACT, in partnership with the Chicago Coalition for the Homeless, used the ACS microdata to estimate the number of individuals in Chicago who are "doubled up"—that is, homeless but living temporarily with friends or family. It is difficult to capture the number of doubled-up individuals through traditional data sources on homelessness, which typically count people living on the streets or in shelter. This is a major gap in the policy debate on homelessness, often resulting in an underestimation of the true housing need in communities. Using the microdata, we were able to develop a methodology to estimate whether a household is doubled-up using particular household and individual characteristics (including income as a percentage of the federal poverty line and relationship to head of household). This methodology would not have been possible using summary tables alone. We found that over 60,000 people in Chicago (or 80% of the total homeless population) are considered doubled up, vastly expanding the understanding of the scope of homelessness in Chicago. This gave CCH a powerful data point to advocate for resources for people experiencing homelessness who are doubled-up.

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IMPACT also used the microdata to understand how many individuals in Illinois were at risk of losing Supplemental Nutrition Assistance Program (SNAP, formerly food stamps) benefits in the event that a federal waiver for Illinois expired at the end of 2017. Without the waiver, certain SNAP recipients would have only been able to receive food assistance for a total of three months within a 36 month period, whether or not they were experiencing hunger, if they were not working at least 20 hours per week. The group of people that was at risk of being impacted by this change was adults without work-limiting disabilities who were not currently responsible for the care of children or other family members.

We used ACS microdata to estimate a sample of people likely impacted based on individual characteristics including the number of dependents, age, hours worked per week, and receipt of SNAP and non-receipt of Supplemental Security Income. We found that over 200,000 people in Illinois who work less than 20 hours per week were in danger of losing food assistance. We looked more deeply at this sample to better understand the barriers they face and found that 1 in 5 lack health insurance coverage (much higher than state or national averages), 1 in 5 had a disability, 64% had only a high school diploma or less, and over 2 in 5 spent more than half of their income on rent. Given the particularities of the people who would be impacted by the loss of the waiver, we would not have been able to understand the needs and barriers faced by this population—or even understand their scale—using ACS summary tables. Heartland Alliance used this information to educate decision-makers about who would be most at risk of losing food assistance as a result of the loss of the federal waiver.

In developing your new privacy procedures, we urge you to consider the value and use of publicly-available microdata in informing key programmatic, policy and resource allocation decisions at the state and local level, as well as for particular high-need populations not portrayed by summary tables. We request that you provide opportunities for researchers to compare data and usability under current methods and proposed methods in order to provide useful feedback. Such a feedback process would help ensure that public microdata can continue to be used to inform research, policy, and practice.

Thank you for your consideration.

Sincerely,



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