

June 21, 2019

Nancy Potok
Chief, Statistical and Science Policy
Office of Information and Regulatory Affairs
Office of Management and Budget

Re: Comments to OMB-2019-0002-0001
Request for Comment on the Consumer Inflation Measures Produced by
Federal Statistical Agencies

Dear Ms. Potok:

Thank you for the opportunity to comment on the Office of Management and Budget's (OMB) notice regarding differences among various consumer price indexes and their influence on the estimation of the Official Poverty Measure.

As members of the U.S. Child Poverty Action Group, a partnership of national organizations dedicated to cutting the U.S. child poverty rate in half within a decade, the signed groups are writing in strong opposition to the proposal to calculate a new poverty threshold that would underestimate the number of children living in poverty and result in millions of children losing access to resources that support their healthy child development.

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. Given our mission, we strongly urge that the Census Bureau's Official Poverty Measure continue to be annually adjusted by the Consumer Price Index for All Urban Consumers (CPI-U).

Children continue to disproportionately experience poverty in the U.S. While they make up 23 percent of the population, they comprise 32 percent of the population living in poverty. A recent landmark study from the National Academy of Sciences¹ confirms that child poverty remains high in the U.S. and there is a direct causal link between poverty and negative outcomes for children's healthy development.

This proposal seeks to change the rate of inflation used to calculate the poverty threshold for the Official Poverty Measure each year. The Official Poverty Measure is already unrealistically low and families living at the poverty line cannot meet their basic needs. A switch from the current measure of inflation to one that measures inflation at a lower level would mean that over time the poverty line, already inadequate, would become even less realistic and our official estimate of the number of children and families living in poverty would become even less accurate.

Children stand to be the biggest losers from this change. Eligibility for many critical anti-poverty programs primarily serving children depend on their income in relationship to the poverty threshold as determined by the Official Poverty Measure. If implemented, over time this proposal would result

¹ "A Roadmap to Reducing Child Poverty," *National Academies of Sciences, Engineering, and Medicine*, The National Academies Press, 2019. <https://doi.org/10.17226/25246>.

in millions of children being denied access to healthcare, nutrition assistance, early childhood education, heating assistance and other resources that have both short- and long-term positive impacts on child well-being.

The U.S. Child Poverty Action Group believes that all children deserve the chance to reach their full potential. Yet as we approach the third decade of the twenty-first century, the inequality gap in our nation continues to grow with children at the forefront. This proposal would only serve to further widen that gap and is the absolute wrong direction for our nation's children.

Thank you for your willingness to consider our comments.

Sincerely,

First Focus on Children

Child Welfare League of America
American Federation of Teachers
National Diaper Bank Network
National WIC Association
Partnership for America's Children
Save the Children Action Network
Share our Strength
ZERO TO THREE