



COALITION ON HUMAN NEEDS

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March 24, 2026

CHN Comments to the Independent Census Scientific Advisory Committee

The Coalition on Human Needs (CHN) is submitting these comments with gratitude for the opportunity to provide advice to the Census Bureau on critical topics affecting the count of young children.

The Coalition on Human Needs (CHN) is an alliance of national organizations working together to promote public policies which address the needs of low-income and other vulnerable populations. The Coalition's members include civil rights, religious, labor, and professional organizations, service providers and those concerned with the wellbeing of children, women, the elderly, and people with disabilities. The Coalition on Human Needs monitors and tracks data on human needs in the United States, including data on poverty, on policies that reduce poverty, and on hardship. The Coalition uses Census data including the American Community Survey (ACS) in its work. The Coalition is one of four organizations that formed and continues to co-lead the Count All Kids Campaign, a national group of child-serving organizations that is working to improve the count of young children in all Census Bureau demographic products.

As a preface to our comments, we note that the count of young children, from birth through age 4, has grown steadily worse since 1980, even as the count of the general adult population has improved.¹ The 2020 Census produced a national count of young children that was about 1 million lower or 5.46% lower than it should have been.² Some states and some counties had counts that were much worse—for example, Florida and Hawaii had census counts of young children that were nearly 10% lower than they should have been, and Imperial County in CA, and Val Verde County in Texas, both had counts more than 20% lower than they should have

¹ *What Past Research Tells Us about How to Prepare for the 2030 US Census Count of Young Children*, Dr William O'Hare, <https://countallkids.org/resources/what-past-research-tells-us-about-how-to-prepare-for-the-2030-u-s-census-count-of-young-children/>

² *Census Bureau Releases Experimental Estimates of State and County Undercounts and Overcounts of Young Children in the 2020 Census*, April, 2024. <https://www.census.gov/newsroom/press-releases/2024/undercounts-overcounts-children-2020-census.html>

been. (We commend the Bureau for developing a statistical measure of the young child count for states and counties.) Given the sustained high net undercount of young children and the increasing net undercount of young children since 1980, it is urgent that the Bureau take any and all steps possible to improve the count of young children in the 2030 Census.

With that in mind, we draw the Committee’s attention to some research on administrative data for young children that raises questions about its accuracy of that data for young children, and ask the I-CSAC to provide advice to the Census Bureau on what research might illuminate this problem.

We also ask the Committee to make recommendations for the Bureau to look beyond the 2026 test and find other ways to test new strategies to improve the count of young children given that the revised plans for the 2026 census test remove all tests of such new strategies.

Administrative Records on Young Children

This recent report by Jae June Lee, [Can Administrative Records Improve Young Child Undercounts in the Census?](#) examined whether administrative records could improve the count of young children in the Decennial Census. The analysis looked at the count of young children from four different sources of data; Demographic Analysis (DA), the Post Enumeration Survey (PES), the Population Estimates Program (PEP) and the 2020 Administrative Record Census Simulation (AR).

Perhaps the most important point is that all four sources showed a significant undercount of young children. However, the AR data showed a different result than the other three sources of data —between children from birth to age two and ages three to five. With DA and with PEP, the undercount got smaller (the count improved) as children get older. But with AR, the count remains flat, with an undercount of nearly 6% for both age groups.

There are also some puzzling results by age, sex and race/ ethnicity. For young Black children, AR Census reports a far larger census undercount than DA does—undercounts of 36.9% versus 14.3% for Black males ages 3 to 5 (note that there is no PEP data for race available). For Hispanic children, the opposite occurs. AR Census shows no undercount at all for Hispanic males ages 0 to 2 while DA and PEP both show roughly 10 to 11 percent undercounts. For Hispanic children ages 3 to 5, AR Census even indicates census overcounts while DA and PEP continue to show undercounts. The author concludes “Administrative records appear to have systematic coverage gaps or classification mismatches that vary by sex, age and race and ethnicity, undermining AR Census’s reliability as an independent validator or primary source of household

characteristics.” That is, either the administrative records are missing some children, and overcounting other children, or they are misclassifying children by race and ethnicity. However, it is unclear in either case why the pattern would change between the two age groups. If the Bureau intends to rely more heavily on administrative records, it needs to research and understand this discrepancy and determine whether it can be corrected to improve accuracy.

A Lost Opportunity to Improve the Count of Young Children: the 2026 Census Test

Young children are typically missed for different reasons than adults are missed.³ A number of research projects have shown that there is very little correlation between the accuracy of the count of adults and the accuracy of the count of young children. Research looking at the factors correlate with the count of young children has found many factors that correlate with the count of young children but not adults, and only one factor (low levels of education) that correlate with the count of adults. In 2019, Count All Kids conducted public opinion research which showed that one in 10 families would not count their young children and another 8% were not sure if they should. In other words, nearly one in five families is at risk of not counting their young child.⁴

The temporal trends in the coverage of young children and older population groups (school age children and adults) since 1980 are quite different and the correlation of state coverage rates for young children and the total population in the 2020 census is negative and not statistically significant. For a set of 30 potential explanatory factor correlations measuring relationships across states for total population coverage and young children, only 3 of the 30 agree with each other.

This means that the Bureau must develop special strategies for counting young children. It cannot assume that if it counts all adults in a household it will automatically also count the young children.

Because young children are missed for different reasons, child advocates have urged the Bureau for several years to test new strategies for counting young children. In response to these recommendations, former Director Santos advised us of some of the changes the Bureau was planning to test.⁵ Most of these changes were included in the 2026 census test plans that were

³*Data Show Young Children Are Missed In The Census For Different Reasons Than Adults Are Missed*, Dr. William P. O’Hare, April 2025. <https://countallkids.org/resources/data-show-young-children-are-missed-in-the-census-for-different-reasons-than-adults-are-missed>

⁴ *Webinar: Census 2020 Messaging Testing Results For Young Children*, September 2019, <https://countallkids.org/resources/webinar-census-2020-messaging-testing-results-for-young-children-2/>

⁵ *Project Update: Advancing Strategies for An Accurate Count of Young Children in the 2030 Census*, August, 2024 (note this includes a link to the letter as well as a summary of his response indicating what they planned

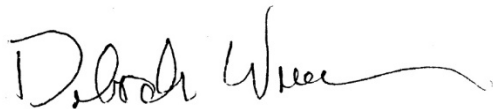
released in 2025. However, they were completely removed from the 2026 census test in the recent [federal register notice](#) describing the final plans.

In response, a number of child advocacy and child serving organizations filed this [comment](#), insisting that the Bureau must test these strategies. Specifically, they urged the Bureau to return to the original plan for the 2026 Census test. If that means conducting the test later, perhaps in 2027, that would be better than conducting this unscientific test that may produce misleading results and that fails to test any new strategies for count young children. They also urge the Bureau to find other opportunities to test new strategies for counting young children, including the 2028 “dress rehearsal” test and smaller scale tests.

We ask the Committee to also recommend that the Bureau test these strategies, and to offer as many possible avenues for such tests as possible.

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 .

Sincerely,

A handwritten signature in black ink that reads "Deborah Weinstein". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Deborah Weinstein,
Executive Director
Coalition on Human Needs