April 14, 2020

Sent via email to: US_Chief_Statistician@omb.eop.gov

To whom it may concern:

On behalf of the over 3,000 scientists who are members of the Population Association of America (PAA) (www.populationassociation.org) and over 40 population research centers nationwide comprising the Association of Population Centers (www.popcenters.org), we are writing in response to the Office of Management and Budget’s request for comments on considerations for additional measures of poverty developed by the Interagency Technical Working Group on Evaluating Alternative Measures of Poverty.

As you may know, PAA and APC are two organizations that together represent over 3,000 population scientists, including demographers, economists, and sociologists, who study the implications of population change. Many of our members examine how socioeconomic factors, including poverty, affect a wide range of outcomes (i.e., health, education, and well-being) in individuals across the lifespan. As a result, our members have a unique interest in the implications of any changes in the official poverty measure (OPM).

Several prominent population scientists who have unique expertise in poverty related research are submitting comments in response to the Working Group’s proposals, which include extending income-based and consumption-based resource measures and calling for additional research by the Federal statistical agencies. We urge you to consider carefully the comments organized by colleagues at Columbia University and signed by other scientists (Wilmer, Waldfogel, Curran, Johnson, and Smeeding) as well as comments from Dr. Robert Moffitt, Johns Hopkins University. These population scientists are leaders in the area of poverty related research and their views reflect the broad range of interest and concerns shared by other PAA members.

In June, PAA responded to an initial OMB request for comments regarding possible changes to the OPM and other income measures. In that communication, we stated that “our members largely recognize the value of adjusting indexes and measures, including the OPM. However, our members believe the methodology for doing so should be grounded in sound science and enhance, rather than diminish, the ability of population scientists to study changes over time and to interpret the role that poverty plays in outcomes across diverse demographic groups.” We reiterate our organizations’ request that the Working Group continue its work bearing in
mind these views. Further, we urge the Working Group to endorse a proposal to convene a National Academy of Science panel and study that would thoroughly and objectively consider revisions to the nation's measure of poverty and economic wellbeing.

Thank you for the opportunity to review information from the Interagency Technical Working Group on Evaluating Alternative Measures of Poverty and to amplify the views that PAA members are raising regarding any changes to the OPM and other income measures.

Sincerely,

Dr. Eileen Crimmins, President
Population Association of America

Dr. Kate Cagney, President
Association of Population Centers