



Diana Hynek
Departmental Paperwork Clearance Officer
Department of Commerce, Room 6616
14th and Constitution Ave., NW
Washington, DC 20230

May 9, 2011

Dear Ms. Hynek:

We are writing on behalf of the Center for Law and Social Policy in response to the Comment Request regarding the American Community Survey published in the Federal Register on March 9, 2011 (Vol. 76, No. 46). CLASP is a non-profit organization that develops and advocates for policies at the federal, state, and local levels to improve the lives of low-income people. We focus on policies that strengthen families and create pathways to education and work. One area of our work focuses on developing policies that support children being raised by grandparents and other relatives when their parents, for a variety of reasons, are unable to care for them. We appreciate the opportunity to provide comments on the American Community Survey. This has been our main source of data regarding children living with grandparents or other relatives since the decennial census long form was discontinued.

Within your request for comments, we will specifically be focusing on your request for “ways to enhance the quality, utility, and clarity of the information collected” regarding data related to children who are living with grandparents and other relatives. These families are often referred to as providing “kinship care”. Kinship care means different things to different people and organizations. Most broadly, it can be used to define any care provided by grandparents or other relatives. More narrowly, in using this term to talk about grandparents and other relatives *raising* children in kinship care, it is often thought of as only those families in which the grandparent or other relative has taken over primary responsibility for most of the basic needs of the child (such as feeding, clothing, providing shelter, and meeting the child’s health, educational, and emotional needs) on a daily basis without either of the child’s parents present in the household.

Kinship families can take many forms when defined broadly: a grandmother caring for her grandson while his parents are deployed overseas, an aunt caring for her sister’s children while her sister is incarcerated, a grandfather caring for his granddaughters because their parents’ substance abuse makes them unable to do so, or a grandmother living with her daughter and son-in-law who work outside the home and caring for her grandchildren while their parents are away during normal business hours or on business trips. There are countless other examples as well.

All these families have very different needs. The grandmother caring for her grandchildren while their parents work may need no supports at all as the parents are also providing for the children's basic needs and are there to give the grandmother time to herself as well. The grandmother caring for her grandson while his parents are out of the country in a combat zone may or may not need financial support depending on whether or not the parents are sending money back, and how much they are able to send back, to provide for his needs. However, she most likely will need respite care, support from others caring for grandchildren without parents, and help accessing any services her grandson needs whether that be special education services, mental health services or any special programs he may be eligible for or need based on his parents being deployed.

On the other hand, the aunt caring for her sister's children while their mother is incarcerated and the grandfather caring for his granddaughters whose parents were dealing with addiction may need much more support. These last two examples represent the group of kinship caregivers who often function as an alternative to foster care and have a unique set of needs. For example, neither the aunt nor the grandfather likely expected or had time to plan to care for the children before they came to live with them and there is likely very little or no financial support coming from the children's parents. In addition to assistance similar to the grandmother caring for her grandson while his parents are overseas in that they may need respite care, help accessing services, and peer support, these caregivers may also need additional financial support and more help accessing services for children who are likely dealing with some level of trauma, beyond separation from their parents.

The Data We Need

Since there are so many variations in how kinship care is defined and how different the various kinship families' needs are, it is important for us to be able to distinguish these various subpopulations of kinship care families: grandparents and other relatives who are simply living with their relative children but are not responsible for them - they do not contribute to meet most of the child's financial needs nor are they primarily responsible for meeting most of the child's basic needs (i.e. grandma and two parents plus children); grandparents and other relatives who find themselves primarily responsible in reality, if not legally, for most of the child's basic needs but who are not financially responsible (i.e. grandma who is caring for her grandson while his parents are deployed but still providing financially for his needs); and grandparents and other relatives who find themselves primarily responsible in reality, if not legally, for their relative children both financially and by providing day-to-day care (i.e. aunt taking care of her sister's children while sister is incarcerated and grandpa caring for granddaughters due to their parents' substance abuse impairing their parenting abilities).

In order to better understand this population and ensure we have an accurate picture of how many people may have these different levels of need, we would like to be able to know 1) how many children are living with grandparents and how many are living with other relatives regardless of who is the householder; 2) whether or not that grandparent or other relative is primarily responsible for meeting the child's basic needs on a daily basis (such as feeding, clothing, and meeting health, educational, and emotional needs); 3) whether or not that grandparent or other relative is contributing most of the financial support to meet the child's needs, either through cash or in-kind assistance, such as housing ; 4) whether

or not the grandchild or other relative child's parents are also living in the home; and 5) how the children and the relative are related.

Children Living with Grandparents and Other Relatives Regardless of Householder Status

We believe the data from the current ACS could provide us the number of children living with grandparents or other relatives (regardless of householder status) fairly easily. Census already releases the number of grandparents living with grandchildren regardless of who is the householder. We believe that the American Community Survey could also provide a similar estimate with regard to other relatives if question 25a was modified to read:

“a. Does this person have any of his/her grandchildren or other related children (excluding this person's own children) under the age of 18 living in this house or apartment?

☐ Yes

☐ No → SKIP to question 26”

In order to better separate children residing with grandparents from children residing with other relatives, it may make sense instead to ask two separate questions, leaving question 25 for grandparents and creating a new 26 that would ask the same questions with regard to other relatives. Please see Appendix A for an example of what the questions we suggest modifying would look like should all of our recommendations be implemented.

Children Living with Grandparents or Other Relatives Primarily Responsible for Meeting Children's Basic and/or Financial Needs

In order to distinguish between those relatives simply living with their grandchildren or other relatives and those who are actually providing for most of the basic and/or financial needs of the children they are living with, we recommend further modifying the existing subparts of question 25. This may also require additional subparts.

Currently, question 25 subparts b and c confuse financial responsibility with responsibility for meeting the child's basic needs. When someone is answering subpart b, they read only that they must be “currently responsible for most of the basic needs of any grandchild under the age of 18 who lives in this house or apartment”. However, when then answering how long they have been “responsible for these grandchildren”, the italicized explanation below refers to being “financially responsible”. As illustrated above, a grandparent or other relative who is responsible for the day-to-day needs of the child, but not for the financial needs, may have very different needs from those who have taken on both financial responsibility for the child and the primary responsibility for meeting the child's most basic needs. It is important for us to know what challenges the relative caregiver has taken on in order to help them better address the needs of the children in their care.

In order to better understand this population and separate these types of responsibility from each other, we recommend that question 25b and c be re-worded to ask:

“b. Is this grandparent or other relative currently responsible for meeting the needs of any grandchild or other relative child under the age of 18 who lives in this house or apartment?

- ☐ Yes, both financially responsible (contributing most of the financial support, either through cash or in-kind assistance, such as housing, for the child) and primarily responsible for meeting most of the basic needs (such as feeding, clothing, and meeting health, educational, and emotional needs) of the child.
- ☐ Yes, primarily responsible for meeting most of the basic needs of the child, but someone else is contributing most of the financial support for the child.
- ☐ Yes, responsible for contributing most of the financial support for the child, but someone else is primarily responsible for meeting most of the basic needs of the child.
- ☐ No →SKIP to question 26

c. How long has this grandparent or other relative been responsible for these grandchildren or other relative children? *If the grandparent or other relative is responsible for more than one grandchild or other relative child, answer the question for the grandchild or other relative child for whom the grandparent or other relative has been responsible for the longest period of time.*

- ☐ Less than 6 months
- ☐ 6 to 11 months
- ☐ 1 or 2 years
- ☐ 3 or 4 years
- ☐ 5 or more years”

If asking about both grandchildren and other relative children in one question is too confusing, an alternative would be to ask question 25 with regard to grandchildren and then insert a new question 26 and ask the same questions with regard to other relative children. It should be noted that any changes we suggest for question 25, would then also apply for any question 26 that is added to address other relative children. Especially if the grandparents and other relatives are asked to respond within one question (25), it will be important to ask how that child is related to the person for whom the question is being answered so that we will still know how many grandparents are taking on these responsibilities as well as how many other relatives are doing so. Inserting another subpart to ask “How is this person related to the child for whom he or she is responsible?” would offer one avenue to obtain this data. If the questions are separated into 25 (for grandparents) and 26 (for other relatives), it may be that the detail provided for each is enough without asking for the specific relationship.

Likewise, if asking about primary financial responsibility and primary responsibility for meeting most of the basic needs of the child in one subpart of a question is too confusing, an alternative would be to separate the two and add a new subpart c. If this alternative was implemented, question 25 subpart b would now include both b and the new c:

“b. Is this grandparent or other relative currently primarily financially responsible (contributing most of the financial support, either through cash or in-kind assistance, such as housing) for a grandchild or other relative child under the age of 18 who lives in this house or apartment?

☐ Yes

☐ No

c. Is this grandparent or other relative currently primarily responsible for meeting most of the basic needs (such as feeding, clothing, and meeting health, educational, and emotional needs) of a grandchild or other relative child under the age of 18 who lives in this house or apartment?”

☐ Yes

☐ No → If no to both b & c, SKIP to question 26”

If separating financial responsibility and continual responsibility for meeting most of the basic needs of a child is too burdensome, we would recommend a slight modification to subpart b to clarify in an explanatory note after subpart b what is meant by “currently responsible for meeting most of the basic needs of a grandchild or other relative child under the age of 18...”. If this recommendation is taken, question 25 subpart b would read:

“b. Is this grandparent or other relative currently primarily responsible for meeting the basic needs of a child? *A grandparent or other relative caregiver should answer yes to this question if he or she is primarily financially responsible (contributing most of the financial support, either through cash or in-kind assistance, such as housing) for this child or is primarily responsible for providing for most of the basic needs of the child (such as feeding, clothing, and meeting health, educational, and emotional needs).*

☐ Yes

☐ No → SKIP to question 26”

Grandparents or Other Relatives *Raising* Children/Responsible for Children with No Parents Present in the Household

As illustrated above, it is especially important to know whether a parent is present in the household with the child in order to help determine how many grandparents and other relatives caring for children have the unique needs that come along with essentially raising that child on their own. We understand that completing a relational matrix for each member, or even each child, of the household, as is currently completed in a supplement of the Survey of Income and Program Participation, can be time-consuming and may discourage survey completion. With that in mind, we recommend that the American Community Survey have a parent pointer for each child under 18. This could be accomplished by adding subpart(s) to question 4 asking for each child whether the child’s mother is present and whether the child’s father is present. Alternatively, the subpart(s) could ask the respondent to note which person(s) (1, 2, 3, etc.) are this child’s parent(s). The latter approach would be preferred if we could reliably obtain data regarding the presence of parents so that we can also identify the parent(s)’ relationship to the householder. This data is critical to understanding and counting the number of families where a grandparent or other relative is actually “raising” the children without a parent present. We are aware that there may be a concern that respondents will not regularly answer questions requiring them to refer back

to another part of the survey, so we defer to your expertise on guarding against non-responses in creating the structure of the questions.

Conclusion

The additional information we recommend you collect and report in the American Community Survey regarding kinship care will provide critical data about how many children are in the various types of “kinship care”. For example, we will know how many grandparents and how many other relatives have stepped in to care for children when their parents are unable to do so for a variety of reasons. This will help us to better understand how many families in each category may have different levels of need and what support they may require based on their needs specific to their situation. The lessons we can learn from this data will help inform child welfare policy, education policy, health policy, child care policy, military family policy and TANF policy, among others.

Thank you again for the opportunity to comment.

Sincerely,



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APPENDIX A

The following details the modifications that would be needed and is an example of what the relevant questions would look like should all of our recommendations be implemented.

Question 4.

- a. What is Person _'s age and what is Person _'s date of birth?
Age (in years):_____ DOB: MM/DD/YYYY
- b. If Person _ is under the age of 18, are this person's parents living in this house or apartment?
- ☐ Yes, both parents are living in this house or apartment
 - ☐ Yes, mother is living in the house or apartment but father is not
 - ☐ Yes, father is living in the house or apartment but mother is not
 - ☐ No

Question 25.

- a. Does this person have any of his/her grandchildren or other related children (excluding this person's own children) under the age of 18 living in this house or apartment?
- ☐ Yes
 - ☐ No → SKIP to question 26
- b. Is this grandparent or other relative currently primarily responsible for meeting the needs of any grandchild or other relative child under the age of 18 who lives in this house or apartment?
- ☐ Yes, both financially responsible (contributing most of the financial support, either through cash or in-kind assistance, such as housing) for the child and primarily responsible for meeting most of the basic needs (such as feeding, clothing, and meeting health, educational, and emotional needs) of the child.
 - ☐ Yes, primarily responsible for meeting most of the basic needs of the child, but someone else is contributing most of the financial support for the child.
 - ☐ Yes, responsible for contributing most of the financial support for the child, but someone else is primarily responsible for meeting most of the basic needs of the child.
 - ☐ No →SKIP to question 26
- c. How long has this grandparent or other relative been responsible for these grandchildren or other relative children? *If the grandparent or other relative is responsible for more than one grandchild or other relative child, answer the question for the grandchild or other relative child for whom the grandparent or other relative has been responsible for the longest period of time.*
- ☐ Less than 6 months
 - ☐ 6 to 11 months
 - ☐ 1 or 2 years
 - ☐ 3 or 4 years
 - ☐ 5 or more years
- d. How is this grandparent or other relative related to the children he or she is primarily responsible for?
- ☐ Grandparent
 - ☐ Other Relative