CLASP
The Center for Law and Social Policy

United States Census Bureau
United States Department of Commerce
1401 Constitution Ave NW
Washington, DC 20230

RE: Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; Household Pulse Survey

The Center for Law and Social Policy (CLASP) is grateful for the opportunity to comment on the recent notice of "Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; Household Pulse Survey." CLASP is a national, non-partisan, anti-poverty organization that has advocated for policy solutions that support the needs of people with low incomes for over 50 years. We develop practical yet visionary strategies for reducing poverty, promoting economic security, and advancing racial equity. CLASP works at the federal, state, and local levels and has deep expertise in child care and early education, workforce development, job quality policies, and income and work support policies.

CLASP commends the U.S. Census Bureau and the U.S. Department of Commerce for working to ensure that the Household Pulse Survey is meeting evolving information needs over the course of the pandemic. Prior to the pandemic, the child care sector was already unaffordable and inaccessible for many families—who struggled to find care that fully met their needs—and was sustained by low provider wages. This is a direct result of a long history of underinvestment and deeply rooted systemic racial, gender, and economic inequities. These deep inequities and historically insufficient federal and state investments greatly impacted children, families, and their child care providers. Thus, the sector was especially vulnerable to and heavily impacted by the pandemic including through program closures, the health and safety of the workforce, the number of children served, increased operating costs, and more. And, today, the child care sector is still in crisis.

Therefore, we believe that it is crucial to ensure that questions regarding families' child care arrangements remain in the Household Pulse Survey. We believe these questions should remain in the survey for a variety of reasons, listed below, and, in fact, believe that additional questions should be added.

Before the pandemic, the child care sector was extremely fractured, inequitable, and inaccessible for far too many families, especially for those with low incomes. While the sector received relief investments, employment remains 5.1 percent lower than it was prior to the pandemic, with 54,000 fewer early educators in the system. This means there is reduced availability and stability of care for families, on top of the already limited availability families faced prior to the pandemic. While demand for care remains high, the stagnant recovery of the child care workforce is a critical impediment on families' access to care. Especially as there continues to be a struggle to recruit and retain providers due to low wages, lack of quality benefits, and little to no job advancement opportunities.

Further, throughout the pandemic, more than $50 billion in emergency relief funding has been made available to the child care sector, including $24 billion in stabilization funding through the American Rescue Plan. These stabilization funds reached more than 80 percent of licensed providers, helping stabilize child care for as many as 9.6 million children. While these funds helped prevent the collapse of the child care sector through a global health crisis, much of that funding is slated to expire at the end of Fiscal Year 2023. Meaning, the entirety of the ARPA child care stabilization funds will be expiring, resulting in potentially devastating impacts on the broader child care sector. In a survey from November 2022, 43 percent of center directors and 37 percent of family child care providers said they would have to raise tuition for working parents, and 22 percent of centers and 19 percent of family child care providers said they would lose staff – further hampering supply, once stabilization funding expired.

The additional supplemental resources are still being spent and will expire in September of 2024, so we will continue to see fluctuating impacts which will be important to document.

These investments were a direct response to the exacerbated need during the pandemic, yet the widespread impact they had demonstrated the need for continued, large-scale investments in the child care sector. It is imperative to continue collecting data on child care arrangements and costs for families to truly understand the impact of these investments on the ongoing recovery of the child care sector. In addition, collecting these data can help policymakers better understand the continued need for investments beyond stabilization and recovery from the ongoing pandemic and help recognize the need for investments that ensure greater economic stability for millions of people through the creation of a system that truly meets the needs of all children and families, as well as support providers.

Additionally, this loss of critical child care funding does not account for potential across-the-board caps on discretionary spending due to the ongoing debt ceiling negotiations. If these cuts happen, it would further reduce access to child care assistance for families, especially those with low incomes who are supported by state child care systems funding through the Child Care and Development Block Grant.

Therefore, as the child care crisis continues and worsens—with the loss of federal relief funding impending and the looming threat of reduced public investment in the system—the critical need to use data to better understand families' experiences with the system remains. Without the promise of sustained, meaningful investments at the federal level, most families will face little improvement in accessing and affording care that meets their needs. Collecting these data remains vital in supporting families.

Rather than eliminate questions asking about families' child care arrangements, we recommend that the U.S. Census Bureau and the U.S. Department of Commerce add questions to better capture the impact that the ongoing child care crisis has on working families and their economic stability—especially those with young children. Below are a few examples of additional questions we would recommend adding to gain an even deeper understanding of the child care needs of families as the sector continues to work to recover:

1. In the last month did you or anyone in your household not work or work fewer hours because you didn't have child care?
2. In the last month, how many times did disruptions in your child care impact your ability to go to work or work the full number of hours you needed to?
3. Has the price you pay for one or more of your child care arrangements increased in the last month?
4. Have you had to change child care providers in the last month because your provider went out of business or had to take fewer children?

Thank you for the consideration of these recommendations. We would be happy to discuss these comments and related data with you. If you have any further questions, please contact Alyssa Fortner at afortner@clasp.org.