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April 14, 2020



***SUBMITTED VIA REGULATIONS.GOV***

Office of the Chief Statistician  
Office of Management and Budget  
725 17th St. NW  
Washington, DC 20503

**Re: OMB's Request for Comment on Considerations for Additional Measures of Poverty, OMB-2019-0007-0001**

To the Office of the Chief Statistician, Office of Management and Budget:

On behalf of The Leadership Conference Education Fund, I write in response to the Office of Management and Budget's (OMB) request for comment on considerations for additional measures of poverty to inform the work of the Interagency Technical Working Group on Evaluating Alternative Measures of Poverty (Working Group).<sup>1</sup> Due to the ongoing COVID-19 pandemic, The Education Fund, like many of our partner organizations, has been focused primarily on advocacy related to the immediate health and economic well-being of the most vulnerable communities in America in response to this crisis. Given the urgency of the moment and the response needed at this time, The Education Fund urges OMB to extend the deadline for submitting comments, in order to ensure that stakeholders have a meaningful opportunity to engage on this critical issue.

The Leadership Conference Education Fund (The Education Fund) is the research and education arm of The Leadership Conference on Civil and Human Rights, a coalition charged by its diverse membership of more than 220 national organizations to promote and protect the civil and human rights of all persons in the United States. The measurement of poverty has profound implications for the lives of people in America. We use poverty measures to understand the amount of people who are struggling to make ends meet and who those individuals are. We use these measures to understand how society and public policies have succeeded and failed at helping those counted as experiencing poverty. And we use these measures to guide where resources should be devoted and to whom these resources should be targeted. As such, we urge you to approach the creation of alternative measures of poverty with caution and deliberation.

The goal of the official poverty measure should be to fairly and accurately measure what the

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<sup>1</sup> Office of Information and Regulatory Affairs, Office of Management and Budget, Executive Office of the President. "Request for Comment on Considerations for Additional Measures of Poverty." *Federal Register*. February 14, 2020. Pgs. 8610-8613. [federalregister.gov/documents/2020/02/14/2020-02858/request-for-comment-on-considerations-for-additional-measures-of-poverty](https://www.federalregister.gov/documents/2020/02/14/2020-02858/request-for-comment-on-considerations-for-additional-measures-of-poverty).

poverty line is in order to help the people in our country with the greatest needs. Defining poverty accurately is critical but not easy. The federal government should provide transparent and reasoned justifications for any specific alternative measures it proposes to adopt and for major elements of any measure, including alternative poverty thresholds. The public should then have at least 90 days to review and comment on these specific alternative measures before they are adopted by the federal government for use and publication on a regular basis. The COVID-19 public health crisis has only made the importance of measuring and understanding economic insecurity in America more apparent. Many households not captured under current poverty measures are just one paycheck away from eviction or hunger, and the outbreak is stretching low-income household budgets even thinner.

Existing research shows that the current official poverty measure does not accurately capture the number of people living in poverty. In fact, research by the Urban Institute found that more than 60 percent of non-elderly adults with incomes up to twice the poverty line reported difficulties paying for food, utilities, rent, or medical bills.<sup>2</sup> Right now, as our nation faces a global health pandemic, our focus should be on helping the communities most in need. The Education Fund has grave concerns that, through this process, the Trump administration may develop measurements of poverty that further underestimate levels of need, especially as we continue to see the economic impacts of this crisis in the months and years to come. At this critical time, it is of paramount importance that we avoid any action that may wrongly define even more people out of poverty and leave them vulnerable to economic insecurity.

Given The Education Fund's current focus on responding to the coronavirus outbreak and mitigating its disproportionate effects on vulnerable populations, we urge OMB to extend or reopen this comment period on this notice until at least 30 days after the National Emergency declared by President Trump has ended to ensure experts and advocates can adequately and accurately respond. If the federal government denies or ignores this request, any alternative measures it adopts will be widely viewed as the illegitimate outcome of a process that failed to give interested parties a fair opportunity to be heard.

For the reasons stated above, The Education Fund urges OMB to suspend any activity around evaluating alternative measures of poverty at this time. Moreover, we request that OMB extend the deadline for these comments until at least 30 days after the end of the National Emergency to ensure that all relevant stakeholders have a meaningful opportunity to comment on these considerations, which have critical implications for the most vulnerable individuals in America. If you have any questions, please contact Arielle Atherley, Policy Analyst, at [atherley@civilrights.org](mailto:atherley@civilrights.org).

Sincerely,



Vanita Gupta  
President and CEO

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<sup>2</sup> Karpman, M., Zuckerman, S., & Gonzalez, D. "Material Hardship among Nonelderly Adults and Their Families in 2017." *Urban Institute*, August, 2018.  
[https://www.urban.org/sites/default/files/publication/98918/material\\_hardship\\_among\\_nonelderly\\_adults\\_and\\_their\\_families\\_in\\_2017.pdf](https://www.urban.org/sites/default/files/publication/98918/material_hardship_among_nonelderly_adults_and_their_families_in_2017.pdf)