



Comment on Considerations for Additional Measures of Poverty

April 14 2020

The American Statistical Association (ASA) is pleased to respond to OMB's [Request for Comment on Considerations for Additional Measures of Poverty](#), as invited in the Federal Register of February 14th, 2020 (85 FR 8610).

We applaud the Interagency Technical Working Group on Evaluating Alternative Measures of Poverty (Working Group) and its thorough, wide-ranging interim report. The ASA appreciates this opportunity to provide comment.

It is well known that the Census Bureau has been reporting the official poverty measure (OPM) since 1964. In 2010, the Census Bureau developed a new poverty measure, called the supplemental poverty measure (SPM), in part by drawing on the recommendations of an influential 1995 National Research Council report. Since this time, the parallel computation of the OPM and SPM has helped the scientific and policy communities compare and understand the relative strengths and weaknesses of each approach. Accordingly, we encourage the Working Group to continue building on the SPM by focusing on key areas for improvement. As stated in the ASA's June 21, 2019 [comment on 84 FR 19961](#), a comprehensive study by an expert panel, such as one from the National Academies, would identify areas and ensure that updates to a statistical series are fully understood and considered prior to implementation.

It is important to have as full an understanding as possible of the anticipated and inadvertent effects of proposed adjustments to a statistical series. Moreover, changes to the inputs of a statistical series, such as indices of inflation used in the computation of poverty, should be congruent with the broader federal efforts to improve measurement. We value OMB's and the Working Group's careful and ongoing work that acknowledges the importance of a federal statistical system that consistently and effectively coordinates its measurement efforts.

The ASA thanks OMB and the Working Group for seeking public comment on this topic and remains ready to provide support as needed. Thank you for your consideration.

Questions on this document can be directed to ASA Science Policy Fellow Daniel Elchert, daniel@amstat.org.