

Population Association of America Association of Population Centers

Office of Government and Public Affairs

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June 20, 2019

Dr. Nancy Potok
Chief Statistician
Office of Management and Budget
Sent via email: Statistical_Directives@omb.eop.gov

Dear Dr. Potok,

We are writing to express interests that our organizations, the Population Association of America (www.thepopulationassociation.org) and Association of Population Centers (www.popcenters.org), have in Federal Register notice #84FR 19961, "Request for Comment on the Consumer Inflation Measures Produced by Federal Statistical Agencies."

As you may know, PAA and APC are two organizations that together represent over 3,000 population scientists and over 40 federally supported population research centers nationwide. Our members include 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).

We anticipate numerous PAA members will submit individual comments regarding the implications of adjustments to the OPM. These comments may address the strengths and weaknesses of indexes for different applications as well as the value of considering annual adjustments to the OPM. We urge you to consider the perspectives of population scientists as the Administration pursues possible changes to OPM—especially as they relate to research. Population scientists are not universally opposed to adjusting the OPM—in fact, 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 outcome across diverse demographic groups.

Thank you for considering our views as you consider possible changes, and the implication of these changes, to the OPM and other income measures.

Sincerely,

John B. Casterline
2019 PAA President

Kathleen A. Cagney
2019 APC President