




I would suggest that the census consider work completed by the Center for Neighborhood Technology on the real cost of housing when transportation costs are added. Their study indicates that the increases in the cost of fuel have had as much impact on foreclosures as too many “drive until they qualify” for a mortgage and then the cost cannot be sustained as fuel costs rise. The study can be found at www.cnt.org.

Terri Blackmore, Executive Director
Washtenaw Area Transportation Study
705 N. Zeeb
Ann Arbor, MI 48103
734-994-3127
734-994-3129 fax
blackmoret@miwats.org

[Subscribe to the WATS Blog](#)



Kimberly Rand
251 Chestnut Ave #1
Jamaica Plain, MA 02130-4413

June 22, 2010

David Johnson
4600 Silver Hill Road
Stop
Washington, DC 20233

Dear David Johnson:

We commend the work of the Census Bureau, BLS, and others who produced the recently released report: Observations from the Interagency Technical Working Group on Developing a Supplemental Poverty Measure. The proposed SPM is vast improvement over the official poverty measure.

Yet, it would be even better if it recognized that a certain level of basic savings and insurance is necessary to help families weather financial shocks and set aside a limited amount of prudent savings for such future needs as their retirement and the education of their children.

Research shows that when confronted with job loss and other adverse events, families with lower levels of liquid assets experience greater hardship and are more likely to resort to public benefits.

The measure could account for these needs by subtracting spending on basic savings, education and health insurance from income (something that is currently done for work-related child care), and adjusting the thresholds upward.

We thank you for your leadership to improve our measures of poverty in the United States.

Sincerely,

Kimberly Rand
6179838712

[REDACTED]

Hello David Johnson,

I forward the attached comments on behalf of San Mateo County, California.

Please advise if we need to do anything further to insure these comments are received for consideration as the Census reviews supplemental poverty measurements.

Regards,

*Judith A. Burrell . SMITH DAWSON & ANDREWS . 1150 Connecticut Avenue NW Suite 1025
. Washington, D.C. 20036 . 202-299-7576-cell . www.sda-inc.com*

[REDACTED]

Hi Bob & Judith:

Can you please deliver to the Census Bureau? Letter is being sent at the request of our Human Services Agency who have long advocated for a change in the way poverty is measured. Please let me know if you hear of any other efforts in this area as it is a big one for us here in high cost San Mateo County.

Thanks,
Connie

Connie Juarez-Diroll
Legislative Coordinator
County Manager's Office
400 County Center
Redwood City, CA 94063-1646
(650) 599-1341 phone
(650) 363-1916 fax

[REDACTED] 4 [REDACTED]

Syreeta Batiste
8710 Independence Ave Unit #104
Canoga Park, CA 91304-2067

June 21, 2010

David Johnson
4600 Silver Hill Road
Stop
Washington, DC 20233

Dear David Johnson:

We commend the work of the Census Bureau, BLS, and others who produced the recently released report: Observations from the Interagency Technical Working Group on Developing a Supplemental Poverty Measure. The proposed SPM is vast improvement over the official poverty measure.

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We thank you for your leadership to improve our measures of poverty in the United States.

Sincerely,

Syreeta Batiste
(818) 701-1552



Dave Sieminski
522 25th Avenue South
Seattle, WA 98144-2327

June 22, 2010

David Johnson
4600 Silver Hill Road
Stop
Washington, DC 20233

Dear David Johnson:

We commend the work of the Census Bureau, BLS, and others who produced the recently released report: Observations from the Interagency Technical Working Group on Developing a Supplemental Poverty Measure. The proposed SPM is vast improvement over the official poverty measure.

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We thank you for your leadership to improve our measures of poverty in the United States.

Sincerely,

Dave Sieminski
2063907338



Michael Allen
340 Orchard Ave.
Somerdale, NJ 08083-2526

June 21, 2010

David Johnson
4600 Silver Hill Road
Stop
Washington, DC 20233

Dear David Johnson:

We commend the work of the Census Bureau, BLS, and others who produced the recently released report: Observations from the Interagency Technical Working Group on Developing a Supplemental Poverty Measure. The proposed SPM is vast improvement over the official poverty measure.

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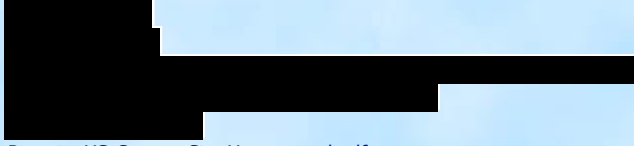
The measure could account for these needs by subtracting spending on basic savings, education and health insurance from income (something that is currently done for work-related child care), and adjusting the thresholds upward.

We thank you for your leadership to improve our measures of poverty in the United States.

This will make your vast improvement even better.

Sincerely,

Michael R. Allen



Attachments:

[Poverty-US_Census-StepUp-scanned.pdf](#)

Good Morning Mr. Johnson,

Mayor Johnson asked that I forward you to you. The original has been placed in the mail. Please confirm receipt.

Thank you,

Sharonte Turner

*Administrative Assistant to Mayor Otis S. Johnson
City of Savannah
PO Box 1027 (31402)
912-651-6444/651-6805 (fax)
sturner@savannahga.gov*



Attachments:

[AAPD Comments to Census re SPM June 2010.doc](#)

Dear Census Bureau,

We hope you will accept our attached comments on the Supplemental Poverty Measure (SPM) although we missed the deadline last week. We experienced a computer virus attack and were unable to email these by the deadline.

Thank you for your consideration.

Jenifer Simpson
Senior Director for Government Affairs
American Association of People with Disabilities
1629 K Street NW
Washington, DC 20006




Attachments:

[AFSCME Comments on Supplemental Poverty Measure 2010.pdf](#)

Please find attached AFSCME's comments on Developing a Supplemental Poverty Measure - Docket No. 100429203-0204-1

Cecilia Perry
Public Policy Analyst
AFSCME
1625 L Street NW
Washington, DC 20036
(202) 429-1095



Good evening, Mr. Johnson,

Below please find comments AARP would like to submit in response to the request for comments on the approach to developing a Supplemental Poverty Measure (SPM) as recommended by the Interagency Technical Working Group.

We will follow up on Monday with a PDF copy.

Thank you for the opportunity to comment.

Cristina Martin Firvida
Director of Economic Security

June 25, 2010

David Johnson
Housing and Household Economics Statistics Division
U.S. Census Bureau
2600 Silver Hill Road, Stop 8500
Washington D.C. 20233-8500

Re: [Docket Number 100429203-0204-01] Developing a Supplemental Poverty Measure - 75 Federal Register, 29513, May 26, 2010

I am writing on behalf of AARP in response to the Census Bureau's request for comments on the approach to developing a Supplemental Poverty Measure (SPM) as recommended by the Interagency Technical Working Group. The recommendations reflect the consensus view of federal agencies responsible for gathering statistical data across a spectrum of activities and programs administered or monitored on behalf of individuals and families in the U.S. for the purpose of establishing the SPM. The purpose of the new approach is to revise the joint Census Bureau and Bureau of Labor Statistics (BLS) statistical release called the Current Population Survey - Annual Social and Economic Supplement (CPS ASEC). The new items proposed are intended to result in a modernized poverty measure as recommended by the National Academy of Sciences (NAS) in 1995. Income poverty is one of the most important economic indicators used to evaluate wellbeing. It is important that we have a measure that is accurate and non-ideological, and that reflects both the current cost of necessities and the financial (cash and near-cash) resources available to people to meet their basic needs. AARP supports efforts to produce a current and more accurate poverty measure consistent with the NAS recommendations and reflected in the Measuring American Poverty Act (S.1625/H.R. 2909), legislation supported by the AARP. A new poverty measure must also give state and federal policymakers a better tool for evaluating the impact of policies designed to alleviate poverty. AARP believes that the SPM meets these goals.

At this time, we are not providing detailed comments on the data sources and methods used by the Census Bureau to arrive at the SPM. The details matter, of course, and AARP policy researchers will be especially concerned with the data and methods used to (1) evaluate out-of-pocket health care expenses and to (2) calculate thresholds for renters and homeowners. We agree that, conceptually, it makes sense to account for out-of-pocket expenses and that homeowners face different costs for housing than renters. We will be interested in evaluating the approach taken by the Census Bureau. In past comments (submitted November 29, 2009), we have encouraged the Census Bureau to define out-of-pocket health care expenses expansively to include expenditures made by frail older people and people with disabilities for long-term services and supports. As estimates are made available, we will be especially interested in evaluating the data and methods used to calculate the full after-tax housing costs of older low-income homeowners.

AARP appreciates the opportunity to comment on the Census Bureau's development of a Supplemental Poverty Measure. We look forward to working with the Department and others in developing a much-needed, modernized poverty measure. If you have any questions about our comments, please contact Larry White, AARP Government Relations and Advocacy, at (202) 434-3813.

Sincerely,

David Sloane
Senior Vice President
AARP Government Relations and Advocacy



Attachments:

[Comment Letter on Poverty Measure Final 6.22.10.doc](#)

Karen Harris
Sargent Shriver National Center on Poverty Law
50 E Washington
Suite 500
Chicago, IL 60602
karenharris@povertylaw.org
General: 312-263-3846
Direct: 312-368-2007
karenharris@povertylaw.org



Comment on Federal Register Notice Docket Number 100429203–0204–01,
“Developing a Supplemental Poverty Measure.”

The Interagency Technical Working Group (ITWG) advises that the Supplemental Poverty Measure (SPM) not follow several of the National Research Council panel’s recommendations. One of these is the NRC recommendation that calculations of new poverty thresholds start with spending on food, clothing, and shelter plus utilities (FCSU) by two-adult, two-child families. Instead, the ITWG recommends starting with spending by a larger group including all families with exactly two children

As the ITWG document notes, “...poverty rate estimates that the SPM will produce do not yet exist...” However, we know what effect the change to the NRC reference family proposal would have on the new poverty thresholds. Compared to the distribution of FCSU spending by two-adult, two-child families that the NRC panel proposed, the 33rd percentile of FCSU spending by all two-child families is around seven percent lower. After multiplication by 1.2 and equivalence scale adjustments, as proposed, all resulting poverty thresholds also would be around seven percent lower than with the NRC reference family group.

The ITWG offers the following rationale for expanding the reference family sample. “In the 15 years since the NAS report, however, the composition of families in the U.S. has continued to change and a growing number of children live in families with only one adult, particularly in lower-income households.” Presumably, then, if the share of children living in families with only one adult had remained unchanged since 1995, the ITWG would have recommended the reference family definition from the NAS report.

Question 1: Why is it reasonable to reduce the threshold amounts that all families are deemed to need for food, clothing, shelter, and other basics just because a growing number of children live in one-adult, lower-income households?

Question 2: If the share of children living in two-child, one-adult, lower-income households continues to grow, would this tend to produce additional downward pressure on future poverty thresholds?

Richard Bavier
2860 Kelly Square
Vienna, VA 22181



Attachments:



[CLASP_SPM_COMMENTS.doc](#)

Hi.

Attached is CLASP's comments on the SPM. Thanks for this opportunity to comment. We are also sending a copy in the regular mail. Thanks again.



Jodie Levin-Epstein

Deputy Director

CLASP | 1200 18th St NW | Suite 200 | Washington, DC 20036

p (202) 906-8003 | **f** (202) 842-2885 | jodie@clasp.org

If you work on poverty and opportunity, you need to know about the work underway to develop a Supplemental Poverty Measure. Click here to get key resources including [two webinars](#) with experts, government officials, and advocates.

From:

F

[REDACTED]

Attachments: [SPM Comments Pearce.pdf](#)

Dear Mr. Johnson,

Please see the attached document for comments from the Center for Women's Welfare on the Interagency Technical Working Group's approach to developing a Supplemental Poverty Measure.

Thank you for your consideration and please let us know if we can be of any assistance.

Sincerely,

Lisa Manzer

LISA MANZER Senior Research Coordinator
Center for Women's Welfare | University of Washington School of Social
Work
TEL (206) 685-5264 FAX (206) 543-1228

..advancing economic justice through research and the Self-Sufficiency
Standard

Visit our website: www.selfsufficiencystandard.org



Attachments:

[poverty letter.doc](#)

The Arc and UCP appreciate the opportunity to submit the attached comments on Docket Number 100429203-0204-01. Thank you Julie

Julie Ward
Director of Employment and Transportation Policy
Disability Policy Collaboration--A Partnership of
The Arc and United Cerebral Palsy
1660 L Street NW Suite 701
Washington DC 20036
(202) 783-2229 phone
(202) 783-8250 fax
jward@ucp.org



Attachments:

[Albelda Comments on Supplemental Poverty Measure.doc](#)

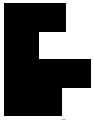
Dear Mr. Johnson,

I respectfully submit the attached comments to the Census Bureau in its deliberations on a supplemental poverty measure.

Sincerely,
Randy Albelda

--

Randy Albelda
Professor of Economics
University of Massachusetts Boston
Boston, MA 02125
617-287-6963
randy.albelda@umb.edu



Attachments:

[SPM Comments from Catholic Charities of Santa Clara County.pdf](#)

Dear Mr Johnson:

Please see the attached comments on the Supplemental Poverty Measure.

Let me know if you have any questions.

Thank you.

Greg

--

Gregory R. Kepferle, CEO

Catholic Charities of Santa Clara County

2625 Zanker Rd., San Jose, CA 95134


Tel: 408-325-5114

Fax: 408-944-0275

email: gkepferle@catholiccharitiesscc.org

www.catholiccharitiesscc.org

Cutting Poverty -- Changing Lives for Good



Dear Mr. Johnson,

At the same time as it publishes the SPM, the Census Bureau should also publish a simple and easily comprehensible gauge of basic income security, one that better reflects post-War-on-Poverty-era concerns about the economic security of working families both below and above the extremely low income-poverty thresholds of the SPM. This measure, which I'll refer to generically as the Low-Income Measure (LIM), should be tied directly to a percentage of median income that reflects the minimum average amount of income needed for a four-person family to achieve a basic "middle-class" budget, such as the 25th percentile budget detailed in Table 2 of the *Middle Class in America* report prepared by the Commerce Department earlier this year.

The LIM would provide a direct, easily comprehensible, and simple gauge of whether the share of Americans within reach of a middle-income standard of living is growing or declining over time. As such, it would complement the median-income, poverty-income, and income-inequality data currently included in the annual Census reports on poverty and income.

Inclusion of the LIM in the annual Census reports would be consistent with the concern that the public, policymakers, and researchers have with the economic well-being of working families who are neither securely middle class nor necessarily stuck below the official poverty line. This concern is reflected in the long-list of federal programs that have income eligibility standards that are considerably higher than the poverty line. Similarly, inclusion of the LIM would reflect a 21st century conception of what FDR called, in his Second Inaugural Address, the "one-third of a nation" who have "too little," including too little of "necessities of life" like "education, recreation, and the opportunity to better their lot and the lot of their children."

The SPM has been described by federal officials and the NAS panel as a "quasi-relative" measure, with the implication being that the percentage change in the thresholds over time would fall somewhere between the percentage changes in thresholds adjusted only for inflation and those adjusted for median income. However, given the unique and experimental nature of the measure, it is impossible to predict whether the measure will actually behave in such a fashion over time, in part because the SPM may be more volatile and sensitive to asset bubbles that distort consumption trends than a measure tied to median income.

Thus, an additional benefit of the LIM is that it would serve as a useful comparison measure for the explicitly experimental SPM. The LIM's usefulness as a comparison measure is strengthened because median-income-based measures are already widely used as measures of poverty or poverty risk by the statistical agencies of other industrial nations, as well as by researchers, and come closest to a consensus measure of poverty (for industrial nations) internationally.

Finally, despite the cost and considerable complexity of the SPM, there is little evidence that it will produce a poverty measure that provides a more accurate estimate of economic deprivation than other less costly, less complex, and more standardized measures of income poverty. Moreover, the substantial weight of the social science evidence that has accumulated since the early 1990s favors the development of a "low-income-plus-hardship" (LIPH) approach to measuring poverty over the income-only (IO) approach taken with the SPM. The LIPH approach uses a material deprivation index in conjunction with relatively simple measures of income poverty, and has been adopted by the United Kingdom and Ireland in recent years.

As Robert Havemann has recently noted, IO measures "ignore many potential sources of well-being that are but weakly tied to cash income. Although people may experience hardship in many dimensions ... only a low level of money income matters in determining who is poor." The LIPH approach is conceptually superior to the IO approach because it explicitly recognizes the multi-dimensional nature of economic deprivation.

For additional comments on the SPM, see my April 2010 paper, [A Modern Framework for Measuring Poverty and Basic Economic Security](#) and my commentary [Three Ways to Improve the SPM](#). Thank you for considering these comments.

Sincerely,

Shawn Fremstad
Director, Inclusive and Sustainable Economy Initiative
Center for Economic and Policy Research
Washington, DC



Attachments:

[Pov Measure Comments 6-10 Final.pdf](#)

To David Johnson, Housing and Household Economic Statistics Division, Census Bureau:

Please find attached comments from the City of Seattle on “Developing Supplemental Poverty Measure”. We appreciate the opportunity to comment. The letter is from Sara Levin, Acting Director, Seattle Human Services Department.

Jerry DeGriek
Seattle Human Services Department
206-684-0684 (office)
206-919-3926 (cell)



Attachments: [SPM Comments Sent_06-25-10.PDF](#)

Mr. Johnson,

Pursuant to the Census Bureau's Request for comments, published May 26, 2010, United Way of the Bay Area submits the attached letter with comments.

Thank you,
Susan

Susan K. Jeong
Community Investment

United Way of the Bay Area
221 Main Street; Suite 300
San Francisco, CA 94105
T: 415-808-4359
F: 415-817-4741
Email: sjeong@uwba.org

Stay up to date on the latest United Way news:
visit the **[LIVE UNITED Bay Area blog](#)**
and enter your email address to subscribe to our feed.



Dear Mr. Johnson,

Thank you for the opportunity to comment on the development of a Supplemental Measure of Poverty (SPM). I'm writing on behalf of the Strategies to Eliminate Poverty (STEP) a grant making initiative of The Seattle Foundation, made possible through a grant from the Northwest Area Foundation. STEP awards policy grants and provides technical assistance regarding policy strategies to expand prosperity and reduce poverty in eight northwest area states: Idaho, Iowa, Minnesota, Montana, North Dakota, Oregon, South Dakota, and Washington.

Measuring family well being is critical to understanding how well or not families are faring and to shaping public debate and informing policy decisions that affect family well being as well as our economy. These comments address general approaches to the value of the SPM in the context of the public dialogue and policy debates as well as specific technical issues.

A primary question for consideration is whether or not families immediately above any poverty threshold should be considered to have achieved a level of adequate well being. Answering this question should inform the type of poverty measures developed and whether or not additional measures are necessary to explain the full the range of family economic circumstances.

Recommendations:

- 1) **Raise the SPM threshold and/or simultaneously develop and publish a higher measure of adequacy.** Fundamentally, while the SPM does address a number of important technical flaws to the current measure of poverty, rather than a new measure that indicates how well families are faring, it remains a significantly low measure of how poorly families are doing. Measures related to well being, often define the boundaries of discussion and related policy options. In a country that strives to excel, establishing a boundary which describes how far we must go to *raise* family well being would be a very useful starting point to policy discussions. Adding a higher boundary of adequacy would both inform policy debates and provide context for the SPM allowing a more transparent understanding of how well families are faring.
- 2) **Add other essential elements of economic security/mobility either to the SPM or a measure of adequacy.** The ability to make ends meet reflects almost double the estimates of the SPM. In addition, elements such as income for education and measuring assets are not included in the SPM even though policy research and precedents show the essential nature of education and assets to helping people moving out of poverty. Either the SPM or a higher measure of adequacy should include these factors.

The issues listed below are described with the understanding that certain technical decisions have not yet been determined but are based on the current recommendations of the Working Group. Specific technical issues include:

- **The SPM is technically complex and may confuse rather than clarify the picture**

and discussion of economic need.

- Such complexity defies poverty data experts and will be difficult to communicate to the public particularly as this statistic will be published along with the current official measure of poverty. Rather than clarifying poverty, such an intricate data point raises further questions about what data is or is not included and how well researchers will understand these issues as well as the legitimacy of conclusions drawn from those decisions. As one example, no reference is made to whether or not sales taxes are considered part of the package of tax calculations or whether these are only income tax related. The confusion among researchers is significant as would be the effect of excluding sales tax from income calculations. Though this effort admirably attempts to address differences among states, technical decisions run the risk of again masking important contributors to poverty. Technical issues related to states are discussed further below.
 - The general public may have trouble understanding the purpose of this number or why two similar numbers exist. In this scenario, rather than elevating a discussion about poverty and well being, the SPM may serve to confuse the public and policy makers with potential consequences for policy decisions based on these numbers.
- **Based on the Working Group's report the SPM does not at this time account for certain important geographical differences between states.**
 - For example a number of states, such as Idaho, North Dakota, and South Dakota, include vast rural spaces require families to travel significant distances for basic needs such as food or school. The SPM only includes transportation as a work expense but these everyday costs are significant for low income rural families.
 - It is unclear whether or not sales taxes are included in the subtraction of resources. This is generally an important issue in estimating a family's total resources given the regressive nature of sales taxes and particularly important for states such as Washington and South Dakota without an income tax.
 - Certain SPM estimates show what are known to be reverse trends in poverty – high poverty states show lower rates of poverty without any type of policy adjustments simply because cost of living is low. Depending on decisions regarding geographic adjustments, states such as North Dakota and South Dakota that do not necessarily have high take up rates of food stamps or established state Earned Income Credits, will show lower rates of poverty under the SPM than under the current measure of poverty. This could be true even though South Dakota several counties with the highest rates of poverty in the country.

Even though the SPM would be published in addition to poverty numbers and would not affect federal funding or program eligibility, new, possibly lower rates of poverty in states with already limited policy frameworks to improve family well being may offer policy makers little incentive to improve policy systems. The additional data complexity and addition of a new but similar statistic could add confusion to what is already a difficult discussion. State policy advocates are challenged to discuss well being when only measures of poverty are available. The SPM continues to be too low to indicate any level of well being above already published estimated thresholds.

Ideally, decision makers in the Census Bureau will consider both the technical implications of the issues described above as well as the larger policy implications of publishing new measures. While no measure will be perfect, as the Census Bureau invests in developing such a technically complex statistic, it will be important to address the shortfalls as described above as well as simultaneously develop an additional measure of adequacy above which we know families are able to make ends meet.

Annette Case
Strategies to Eliminate Poverty
www.expandingprosperity.com



Attachments:

[supplemental poverty measure comments Dept of Commerce June 2010 FINAL.pdf](#)

Attached,

Please find comments on the supplemental poverty measure from Leslye Krutko, Director of the City of San José's Housing Department. We appreciate the opportunity to comment on this important issue.

Thanks,

Alejandra Herrera Chávez

City of San Jose - Housing Department
Policy & Planning
200 East Santa Clara Street, 12th Floor Tower
San Jose, CA 95113
T: 408-975-4424 | F: 408-998-3183
www.sjhousing.org



Attachments:

- [100625 Comments - Developing a Supplemental Poverty Measure.wpd](#)
- [100625 Comments - Developing a Supplemental Poverty Measure.rtf](#)

Dear Mr. Johnson,
I have attached the comments of the National Senior Citizens Law Center on the Working Group report on the development of a Supplemental Poverty Measure.
Sincerely,

Gerald A. McIntyre
National Senior Citizens Law Center
3435 Wilshire Boulevard, Suite 2860
Los Angeles, CA 90010
213-674-2900
213-639-0934 (FAX)
gmcintyre@nscl.org



Attachments:

[Poverty Measure Comments 06-25-10.doc](#)

Comments attached. Thank you.

--

Linda Meric, National Director
9to5, Natl Assn of Working Women
655 Broadway #800
Denver, CO 80203
(303) 628-0925 (ofc)
(303) 520-3177 (cell)
Lindam@9to5.org



Attachments:



[AAUW Poverty Definition comments 6.25.10.pdf](#)

To whom it may concern:

Attached please find comments submitted by the American Association of University Women (AAUW) with respect to the U.S. Department of Commerce's solicitation notice for "Developing a Supplemental Measure of Poverty." Thank you for the opportunity to submit comments.

Best,

Adam Zimmerman

Adam Zimmerman

Regulatory Affairs Manager

American Association of University Women (AAUW)

202-728-7617

zimmermana@aauw.org

<<AAUW Poverty Definition comments 6.25.10.pdf>>



ST. MARY'S CENTER

A COMMUNITY OF CARE FOR SENIORS, CHILDREN AND FAMILIES IN OAKLAND

June 24, 2010

David Johnson
Housing and Household Economic Statistics Division
Census Bureau
via email: spm@census.gov

Re: Comments on the Interagency Technical Working Group's approach to developing a Supplemental Poverty Measure (SPM)

Dear Mr. Johnson,

Pursuant to the Census Bureau's request for comments, published May 26, 2010, St. Mary's Center submits the following comments.

St. Mary's Center, a community service center, serves homeless, at-risk, and homeless seniors; locates permanent housing and health care, facilitates independent living, offers recovery, mental health, community nursing, money management, emergency winter shelter for seniors; senior meals; senior and family emergency food; educational enrichment Preschool.

St. Mary's Center commends the work of the Census Bureau, BLS, and others who produced the recently released report: *Observations from the Interagency Technical Working Group on Developing a Supplemental Poverty Measure*. The proposed SPM is a vast improvement over the Federal Poverty Thresholds. We applaud in particular the addition of shelter, clothing, and utilities to food as part of the basic set of commodities that all families must purchase. We also applaud the thoughtful approach to adjusting for regional differences in the cost of housing and for differences among those who rent, own a home with a mortgage, and own a home without a mortgage.

Despite its improvement over the Federal Poverty Thresholds, the proposed SPM falls short of capturing the full range of financial vulnerability that destabilizes low-income families. A more complete measure of poverty would:

- Include the actual cost of, rather than the amount expended for, the basic set of commodities because many low-income individuals and families do not have adequate income to cover all the commodities that households must purchase for a minimum standard of living. For example, a low-income family may spend a very small amount on housing because they fit two households into a two bed-room apartment. Therefore, considering only expenditures and disregarding actual need results in a substandard measure.
- Include, rather than exclude, the basic commodities of health care, transportation, and child care, since these are very basic needs that people need to live a productive, healthy life.
- Adjust for differences in cost and consumption patterns based on age as the SPM is

designed to identify poverty in families with children and does not include that of older adults. The needs of family units are different than those of older adults, where health care is usually the second highest expense for older adults whereas child care is usually the second highest expense for younger adults.

- Adjust for regional differences in the cost of *all* commodities and not only housing since food, utility, child care, and health care costs vary significantly depending on local costs of living.
- Recognize that a certain level of basic savings and insurance are necessary to help families weather financial shocks and set aside a limited amount of prudent savings for future needs such as the education of one's children and retirement.

St. Mary's Center Published a document titled, "Going Grey in the Golden State" in collaboration with The Oakland Institute, using the work of UCLA and the Elder Economic Security Index. St. Mary's Center Seniors have offered testimony at our state capitol, before Alameda County Board of Supervisors and met with our Congresswoman Barbara Lee advocating for alternatives to the Federal Poverty thresholds produced by Dr. Diana Pearce of the University of Washington and the University of Massachusetts Boston, respectively, the [Self-Sufficiency Standard](#) and [Elder Economic Security Standard™ Index](#) are county-and-family specific measures of the minimum income necessary to purchase the basic commodities that all families need to make ends meet; these measures, and others like them, provide an improved basic threshold of need.

In 2009, Representative Jim McDermott and Senator Chris Dodd introduced the Measuring American Poverty Act ([HR 2909](#) and [S 1625](#)), which would require the development and publication of a "decent living standard threshold", that would not only account for cost differences by geography and family type, but also provide a measure of income adequacy reflecting the resources necessary to meet basic needs and live beyond deprivation.

Representing a coalition of over 500 organizations, the Insight Center recommends that the Interagency Technical Working Group:

Build upon the Self-Sufficiency Standard and Elder Economic Security Standard™ Index, and the legislatively proposed "decent living standard threshold", so that the SPM reflects what it actually costs to pay for basic commodities. We need a measure that reflects a minimum standard of living versus a measure of deprivation.

If it is not possible to review the SPM according to the principles outlined above, we then recommend that the Working Group:


Develop a "decent living standard threshold" **in addition to** the SPM, recognizing that one measure may not fit all needs: in reality, families move along a continuum from poverty to economic stability. For example, the White House Task Force on Middle Class Working Families, chaired by Vice President Joe Biden, recognizes the importance of assessing the impact of new and existing policies across the board to determine if they are helping or hurting the middle class.

Policymakers and the general public need to understand effectiveness of our public policies in not only lifting people out of poverty but also helping Americans reach true economic security in today's economy.

Thank you for taking leadership on this important issue. We would be happy to assist in any way we can as you consider these comments.

Sincerely,

Carol Johnson
Executive Director



“...plus any Federal Government in-kind benefits that families can use to meet their food, clothing, shelter, and utility needs, minus taxes (or plus tax credits), minus work expenses, minus out-of-pocket expenditures for medical expenses.

“The Census Bureau has long experience in estimating in-kind benefits and taxes and they should continue to improve these estimates. Along with taxes, payments for child support should also be included in subtractions to income, to the extent that data are available to do this.”

Comment: Estimating what “in-kind” benefits families can use versus without the reality check of what barriers families face in access is a bit problematic and invites some conversation around the reliability of data collection. Are there going to be caveats to address this on a geographic, implementation level?

“Ideally, for child care expenses this adjustment would be based on actual reported expenses. In the absence of these data, the Census Bureau should make the best imputation possible of actual expenses. Many families find ways to meet their child care needs outside the market, so there is a great deal of variance in actual child care expenses. Any imputation method should take this skewness into account.”

Comment: If the inclusion of child care expenses outside the market is going to be part of the imputation, then the “in-kind” government assistance should be part of the imputation as well—that assistance does not apply when you are outside of the market. To apply a blanket benefit as a cost reduction even for families that are paying \$50 a week to a relative will skew results with an income supplement that is not really there. The self-sufficiency standard for 36 states displays the cost of child care assuming licensed care and that is a consistent, stable methodology that makes sense to parents, service providers and child care assistance advocates.

The level of total work expenses subtracted from any family’s resources should be capped by the earning level of the lowest-earning adult.

Comment: Why, when it has been proven, repeatedly that the cost of working rises exponentially with more work? It has been proven having two jobs cost more than having one (especially if they are both part time with no benefits). These costs will appear in transportation, food and child care. Although the worker may be earning more, the cost is higher—how will that impact be taken into consideration?

Agree that medical is after the fact since many forgo health care expenses to meet the threshold. Health care and access to overall health is still considered a luxury, unfortunately.

Thank you for your continued work in this effort. Please review the self-sufficiency model again as another measure of family economic health and financial stability.

Cheers,

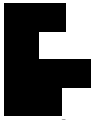
Tracey Stewart

Economic Self-Sufficiency Project Coordinator
Colorado Center on Law and Policy

Tel: 303.573.5669 x314 | Fax: 303.573.4947 | Web: cclponline.org

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If you appreciate our work, please consider a donation to help continue our efforts,
www.cclponline.org/donation.php.



Attachments:



[SPM Comments.doc](#)




Attachments:

[Poverty measure memo.pdf](#)
[Supplemental Poverty Measures062010.pdf](#)

To whom it may concern,

I would like to submit the following comments with respect to the May 26, 2010 Federal Register (Vol.75, No. 101)notice regarding *Developing a Supplemental Poverty Measure* (Docket number 100429203-0204-01).

Casey Campbell
Economic Development Advisor
Office of Economic Development
(907) 465-3812
casey.campbell@alaska.gov

To:  spm@census.gov
Subject: DOC032[1].PDF/Ltr. to David S. Johnson from Mayor Bloomberg
Date: 06/18/2010 02:57 PM
Attachments: [DOC032\[1\].PDF](#)

From Deputy Mayor Linda Gibbs

To: spm@census.gov
Subject: Fw: Dodd & McDermott Supplemental Poverty Measure (SPM) Suggestions to Census Bureau
Date: 06/29/2010 11:10 AM
Attachments: [DoddMcDermott - SPM Comment Letter to Census - 20100624.pdf](#)

Date: 06/24/2010 04:41 PM
Subject: Dodd & McDermott Supplemental Poverty Measure (SPM) Suggestions to Census Bureau

David and All,

Thank you for your work on the SPM and for allowing a public comment period. We have just mailed you the attached letter from Senator Dodd and Representative McDermott. Let us know if you have any questions.

Cheers,

Indi

Indivar Dutta-Gupta | indivar.dutta-gupta@mail.house.gov | Google Voice:
+1.480.INDIVAR (463.4827)
Professional Staff | US House of Representatives, Committee on Ways and Means | Subcommittee on Income Security and Family Support
B-317 Rayburn House Office Building | Washington, DC 20515
T: +1.202.225.5281 | F: +1.202.225.9480 | US C/M: +1.312.479.4676 |
International C/M: +1.312.646.8994
You should subscribe to the committee's eNewsletter here, follow us on Twitter here and join us on Facebook here .
P Consider the environment before printing this email.

NOTE: I will be away from the office from 28 June until 9 July 2010, with intermittent access to email. I may have greater access to my personal email (indivar.duttagupta@gmail.com), and should also be reachable at +1-480-463-4827 during this period.
(See attached file: [DoddMcDermott - SPM Comment Letter to Census - 20100624.pdf](#))

From: david.s.johnson@census.gov
To: spm@census.gov
Subject: Fw: SPM Comment Letter from Senator Dodd and Representative McDermott
Date: 06/29/2010 11:06 AM
Attachments: [SPM_Comment_Letter_Final_Dodd&McDermott.pdf](#)

Hi David,
Please find attached a letter that Senator Dodd and Congressman McDermott are sending to you today to comment on the Working Groups proposed Supplemental Poverty Measure.
Best
Margot

Margot Crandall-Hollick
Professional Staff Member
Subcommittee on Children and Families
Senator Christopher J. Dodd, Chairman
404 Hart Senate Office Building
Phone: (202) 224-2823
Fax: (202) 224-7475
(See attached file: SPM_Comment_Letter_Final_Dodd&McDermott.pdf)

To: ['spm@census.gov'](mailto:spm@census.gov)
Subject: FW: SUPPLEMENTAL POVERTY MEASURE.
Date: 06/25/2010 12:01 PM
Attachments: [hppscan108.pdf](#)

Attached please find a letter from Mayor Julián Castro. We appreciate the opportunity to provide our insight into this very important issue.

Frances A. Gonzalez
Assistant to Mayor Julián Castro

Subject: HAC Comments on Developing a Supplemental Poverty Measure
Date: 06/25/2010 11:37 AM
Attachments: [HAC SPM Comments 6 25 10.pdf](#)

Re: Comments on Developing a Supplemental Poverty Measure [Docket Number 100429203-0204-01]

Dear Mr. Johnson:

The Housing Assistance Council (HAC) respectfully submits the following comments in response to the May 26, 2010 Federal Register Notice for developing a Supplemental Poverty Measure.

HAC is pleased to have this opportunity to comment on the development of the Supplemental Poverty Measure. Please do not hesitate to contact me if you need additional information or clarification of our comments.

(See attached file: HAC_SPM_Comments_6_25_10.pdf)

Sincerely,

Moises Loza
Executive Director

Housing Assistance Council
1025 Vermont Ave., NW
Suite 606
Washington DC 20005
(202) 842-8600
hac@ruralhome.org

=====
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Subject: Heartland Alliance - Comments on the Supplemental Poverty Measure
Date: 06/25/2010 04:44 PM
Attachments: [Supplemental Poverty Measure Comments - 6-25-10 - Heartland Alliance.pdf](#)
[Supplemental Poverty Measure Comments - 6-25-10 - Heartland Alliance.pdf](#)

Thank you for this opportunity to provide comment on the proposed Supplemental Poverty Measure. Heartland Alliance for Human Needs & Human Right's comments are attached. If you have any questions or difficulties with the attachment, do not hesitate to contact me.

Sincerely,

Doug Schenkelberg

Doug Schenkelberg | Associate Director – Policy & Advocacy
Heartland Alliance for Human Needs & Human Rights
33 West Grand Avenue, Suite 500 | Chicago, IL 60654
P. 312.870.4947 | F. 312.870.4950 | C. 312.296.0893
dschenkelberg@heartlandalliance.org | www.heartlandalliance.org



Subject: Insight Center Comments on Supplemental Poverty Measure (SPM)
Date: 06/23/2010 05:09 PM
Importance: High
Attachments: [Insight SPM Comments 6 23 10.pdf](#)

Dear Mr. Johnson,

Please find attached the Insight Center's comments on the approach to developing a Supplemental Poverty Measure (SPM).

Feel free to let me know if you have any questions.

Best,
Jenny

Jenny Chung

Attorney/Program Manager
Insight Center for Community Economic Development (formerly NEDLC)
3701 Wilshire Boulevard, Suite 208 *(please note new contact information)*
Los Angeles, CA 90010
Phone: (213) 235-2614

2201 Broadway, Suite 815
Oakland, CA 94612-3024
Phone: (510) 251-2600 Ext. 124



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Subject: letter of support for Mayor Bloomberg's anti-poverty initiative
Date: 06/25/2010 06:52 PM
Attachments: [City of San Jose VM Chirco support letter.pdf](#)

Attached you will find a letter of support for Mayor Bloomberg's anti-poverty initiative.

Thank you for your consideration.

ADRIANNA MASUKO

Policy Director | Office of Vice Mayor Judy Chirco
200 East Santa Clara Street, 18th floor | San Jose, Ca 95113
direct 408.535.4975 | fax 408.292.6471
adrianna.masuko@sanjoseca.gov



Subject:



Letter

Date:

06/24/2010 04:13 PM

Attachments:

[DOC062410.pdf](#)

(See attached file: DOC062410.pdf)



Subject:

Date: 06/24/2010 09:57 AM

Attachments: [2010 Comment on Federal SPM.pdf](#)
[2009 Economic Modeling Final Report.pdf](#)

Thank you for the opportunity to provide information related to the development of a Supplemental Poverty Measure (SPM).

In Connecticut, a Child Poverty and Prevention Council was established by statute several years ago to develop and promote the implementation of a ten-year plan to reduce the number of children living in poverty in the state by fifty percent. As part of our work in this regard, the Council engaged the Urban Institute last year to estimate the potential effects of the Council's priority recommendations on child poverty in Connecticut. The project modeled the economic impact of implementing council recommendations such as increased adult education and enhanced child care subsidies.

The Urban Institute's final report to the council uses two approaches to measuring poverty. The first approach is based solely on pre-tax cash income sources as defined by the official poverty measure used by the U.S. Census Bureau. The second approach approximates the definition recommended by the National Academy of Sciences, which includes cash income but adds capital gains and in-kind benefits, deducts federal and state income taxes and subtracts nondiscretionary expenses such as the cost of child care and transportation to work. The Council found the broad definition of resources used by the Urban Institute valuable in demonstrating how government tax and benefit policies affect family income and poverty status.

For your information and review, we have attached a copy of the Economic Modeling Report which provides a detailed description of the methodology, data sources, and analysis used by the Urban Institute. We believe these may be useful to you in defining the Supplemental Poverty Measure.

Please feel free to contact us if you have any questions or need additional information.



Subject:
Date:



Need to Subtract Spending on Assets for New SPM
06/23/2010 07:57 PM

Aloha,

I am writing to ask that the Bureau consider subtracting assets such as spending on savings, education, and health insurance for the new SPM. The truth is that families must have asset wealth if they are to sustain a life outside of poverty.

Thank you,

Jeff Gilbreath
Honolulu, HI



Subject:

New England Consortium Supplemental Poverty Measure (SPM) Feedback

Date:

06/25/2010 12:00 PM

Attachments:

[SIPM Feedback with letterhead.doc](#)

Please find feedback on the SIPM attached from the New England Consortium (NEC). Do not hesitate to contact me for clarification or questions on the feedback provided. Thank you for the opportunity to comment on this important effort.

Sarah Chasse, MSW
NEC Regional Coordinator
Connecticut Association for Human Services (CAHS)
110 Bartholomew Avenue, Suite 4030, Hartford, CT 06106
(860) 951-2212 ext. 245 work
(860) 690-3627 cell
(860) 951-6511 fax
schasse@cahs.org
www.cahs.org
www.endpovertynewengland.org



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Subject: Public Comment on Developing a Supplemental Poverty Measure
Date: 06/25/2010 05:05 PM
Attachments: [New America Foundation_SPM Comments.pdf](#)

On behalf of Reid Cramer, please find enclosed public comments in response to the Department of Commerce notice and solicitation of comments on developing a supplemental poverty measure.

Please direct any questions to Program Director, Reid Cramer: cramer@newamerica.net

Thank you.

Alejandra Lopez-Fernandini
New America Foundation
1899 L Street NW, Suite 400
Washington, DC 20036
202-596-3357 (direct line)
lopez@newamerica.net



Subject: Public Comment on Supplemental Poverty Measure
Date: 06/25/2010 04:35 PM
Attachments: [PublicComments_SPM_from_NC Justice Center.pdf](#)

Dear Mr. Johnson,

Please find attached our comments on the Interagency Technical Working Group's approach to developing a supplemental poverty measure.

Sincerely,

Alexandra Forter Sirota

Public Policy Analyst
North Carolina Budget and Tax Center
A Project of the N.C. Justice Center
alexandra@ncjustice.org
919-861-1468



Subject:
Date:



RE: Comment Letter on Supplemental Poverty Measure
06/22/2010 06:01 PM

Thanks for cc'ing me Karen!

From: Karen Harris [mailto:karenharris@povertylaw.org]
Sent: Tuesday, June 22, 2010 1:50 PM
To: spm@census.gov
Cc: Susan Ritacca; Hannah Weinberger-Divack; Jennifer Brooks
Subject: Comment Letter on Supplemental Poverty Measure

Karen Harris
Sargent Shriver National Center on Poverty Law
50 E Washington
Suite 500
Chicago, IL 60602
karenharris@povertylaw.org
General: 312-263-3846
Direct: 312-368-2007
karenharris@povertylaw.org

Subject:

RE: Mayor Otis Johnson

Date:

06/24/2010 12:41 PM

Received, Sharonte.

Thank you again for your effort. We appreciate Mayor Johnson's comments.

Most sincerely,

Suzanne

Subject: Mayor Otis Johnson

Good Morning Mr. Johnson,

Mayor Johnson asked that I forward you to you. The original has been placed in the mail. Please confirm receipt.

Thank you,

Sharonte Turner

Administrative Assistant to Mayor Otis S. Johnson

City of Savannah

PO Box 1027 (31402)

912-651-6444/651-6805 (fax)

sturner@savannahga.gov

To: spm@census.gov
Subject: SPM Comment Letter
Date: 06/21/2010 04:07 PM
Attachments: [FINAL Comment Letter to Census on SPM - 6-21-10.doc](#)

Dear David Johnson,

On behalf of CFED (the Corporation for Enterprise Development), I am pleased to submit the attached letter of comment on the proposed Supplemental Poverty Measure. We appreciate your consideration of these suggestions for treating some level of savings and insurance as “necessary expenses”. We would be happy to provide more detail or to discuss this with you, should you wish.

Sincerely,

Steve

Stephen Crawford, Ph.D.
Vice President for Policy & Research, CFED
Nonresident Senior Fellow, Brookings
CFED – Expanding Economic Opportunity
1200 G Street, NW, Suite 400
Washington, DC 20005
202.595.2691 (direct); scrawford@cfed.org

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To:

[David Johnson](#)

Subject:

SPM Comment

Date:

06/04/2010 06:41 PM

David

I am leaving the country for the rest of the month. So, even though Ive only been through the SPM paper once, I am going to share a couple of impressions. First, I found it odd and incongruous that a poverty level should be conceived of in relative rather than absolute terms i.e. relative to median family income. As with the establishment of the first threshold, a person needs an absolute level of nutrition to survive, not an amount relative to the median income. A relative level, of course, avoids a certain number of political problems. And really, if you read the Orshansky history the idea that Census and BLS are somehow operating in an apolitical environment is absurd.

Second, the whole discussion of medical costs seems out of touch. In 2014 this country is going to start insuring somewhere between 10-14% of the population that has never been insured before. One of the consequences is that employers will dramatically shift the compensation package from direct to indirect compensation and slow the growth of direct compensation substantially. MOOP needs to be treated in terms of both cost and total compensation.

The third thing that struck me is the total absence of substantive purpose for this exercise.

Luck

Tom

Cc: spm@census.gov
Subject: SPM Letter
Date: 06/11/2010 11:47 AM
Attachments: [US Census Bureau David Johnson 061010 Ltr \(HW, DL\).pdf](#)

(Ms.?) Stacey Gillett,
The attached PDF will be forwarded to the US Census Bureau with a hard copy of the letter mailed to David Johnson as addressed.
Hershell Warren
Senior Advisor
Office of the Mayor

From: Goins, Angela (Mayor's Office)
Sent: Friday, June 11, 2010 9:31 AM
To: Warren, Hershell (Mayor's Office)
Cc: Lance, Diane (Mayor's Office)
Subject: Correspondence



Subject: SPM_Census_Bureau_Comments_6_25_10_FINAL
Date: 06/25/2010 10:07 AM
Attachments: [SPM_Census_Bureau_Comments_6_25_10_FINAL.pdf](#)

Please find attached comments on the proposed Supplemental Poverty Measure submitted on behalf of Wider Opportunities for Women.

Susan Rees
Director of Policy and National Projects
Wider Opportunities for Women
1001 Connecticut Ave., NW, Suite 930
Washington, DC 20036
202-464-1596
srees@wowonline.org

██████

To:

██████

spm@census.gov

Subject:

Supplemental Poverty Measure comments from Women's Law Project

Date:

06/25/2010 05:24 PM

June 25, 2010

David Johnson

Housing and Household Economic Statistics Division

Census Bureau

4600 Silver Hill Road, Stop 8500

Washington, DC 20233-8500

Dear Mr. Johnson,

In this letter, the Women's Law Project respectfully submits comments about the Census Bureau's development of a Supplemental Poverty Measure (SPM).

The Women's Law Project is a 501(c)(3) organization with offices in Pittsburgh and Philadelphia, PA. Our mission is to advance and protect the rights of all women throughout their lives through litigation, advocacy, and public education. We have worked on poverty issues throughout our history, with particular emphasis on the intersection of poverty and gender. Our work, individually and through coalitions, has resulted in increased child support payments for Pennsylvania children whose custodial parents receive TANF, eliminating state residency requirements for receiving TANF which had a disproportionate impact on women leaving violent relationships, and restoring TANF eligibility to Pennsylvania residents who had drug felony convictions, which affected many women who had experienced years of domestic and sexual abuse.

Current poverty measures do not adequately capture the reality of the poorest families in the United States. We urge the Census Bureau to develop an SPM that addresses the following:

- **Education-related expenses and basic savings should be treated as essential or non-discretionary expenses.** In Pennsylvania, 93.8% of TANF recipients are women, who are usually caring for one or two children. [\[1\]](#) Education expenses for school-aged children, as well as tuition, books, or other necessary costs for women to advance their education (including child-care expenditures) are essential for these women and should be recognized as such. Not recognizing these costs as necessities included in the SPM blatantly ignores the realities of single mothers struggling to provide for their children's education and their own. Basic savings – for an emergency fund, retirement, or other uses – should also be recognized as essential expenditures. A recent report by the Closing the Gap Initiative of the Insight Center for Community Economic Development found that,

during their prime working years, single African-American women's median net worth was \$5.^[2] This shocking information reinforces the fact that basic savings should be considered essential expenditures in the SPM. Saving for retirement, for emergencies such as car repairs or for an apartment security deposit are not optional for the poorest individuals and families in the United States.

· **Adequate health insurance should be treated as an essential or non-discretionary expense.** We support the proposed SPM's guideline that would subtract out-of-pocket expenditures on health care from family income, but urge the Bureau to adjust SPM thresholds to include the cost of adequate health insurance for those families or individuals who lack it. Some families and individuals who are underinsured or lack health care coverage completely will hopefully find new, affordable coverage under the federal health care reform legislation passed earlier this year, but the Congressional Budget Office projects that roughly 21 million nonelderly Americans will remain uninsured in 2016.^[3] And many low-wage workers will continue to face barriers in obtaining health care coverage – namely affordability and adequacy of coverage – even after the new legislation takes full effect. We have seen, throughout the health care debate, how women's health is affected by health care policies, from denying survivors of domestic violence health insurance because of their "dangerous lifestyle" to the removal of essential reproductive health care services, namely abortion, from state insurance plans. Women tend to have higher health care expenditures than men because of the high monthly cost of effective hormonal contraception and the necessity of visiting a doctor each year to obtain a prescription for this contraception. Women's health care costs are also elevated because they are more likely to see a doctor for preventive health care, for which individual insurance plans penalize women by charging them a higher rate than their male counterparts.^[4] These expenditures are necessary expenses and should be recognized as such by the SPM.

· **The Supplemental Poverty Measure should reflect the amount of income needed to maintain a minimally adequate standard of living.** The financial needs of families and individuals have changed dramatically since the 1960s, when the official poverty measure was adopted. Americans spend proportionally more on housing, transportation and child care, for example, and less on food than they did fifty years ago. The SPM should use the Self-Sufficiency Standard, which "measures how much income a family of a certain composition in a given place needs to adequately meet their basic needs—without public or private assistance."^[5] In Pennsylvania, one adult with two young children needs \$47,857 to live in Pittsburgh – 261% of the federal poverty guidelines. In Philadelphia, that family needs \$54,705 to live, which is 299% of the federal poverty guidelines. Current poverty measures obviously do not accurately portray what is needed to live in the United States, and the SPM should truly reflect what a family or individual needs to make ends meet in the United States in the twenty-first century.

We applaud the Census Bureau's commitment to more accurately describing poverty in the United States. We believe that a properly delineated SPM will present a fuller picture of what it takes to survive in today's society, and has particular applications to the realities faced by all women in making ends meet.

Please contact us if you have any questions or concerns. Thank you for the opportunity to weigh in on developing a Supplemental Poverty Measure.

Sincerely,

Carol E. Tracy
Executive Director
125 South Ninth Street #300
Philadelphia, PA 19107

Susan Frietsche
Senior Staff Attorney
401 Wood Street Suite 1020
Pittsburgh, PA 15222

[1] Pennsylvania Department of Public Welfare Characteristics Report:
<http://www.dpw.state.pa.us/ServicesPrograms/CashAsstEmployment/003673735.htm>

[2] Insight Center for Community Economic Development, "Lifting as We Climb: Women of Color, Wealth, and America's Future."
<http://www.insightccd.org/uploads/CRWG/LiftingAsWeClimb-InsightCenter-Spring2010.pdf>

[3] Congressional Budget Office, "Payments of Penalties for Being Uninsured Under the Patient Protection and Affordable Care Act," Revised April 30, 2010,
http://www.cbo.gov/ftpdocs/113xx/doc11379/Individual_Mandate_Penalties-04-30.pdf

[4] U.S. Department of Health and Human Services, "Roadblocks to Health Care: Why the Current Health Care System Does Not Work for Women,"
<http://www.healthreform.gov/reports/women/women.pdf>

[5] Pathways PA, "The Self-Sufficiency Standard for Pennsylvania 2010-11,"
http://www.pathwayspa.org/10-11_SS_Standard.pdf

--

Susan Frietsche
Senior Staff Attorney
Women's Law Project
Western Pennsylvania Office
401 Wood Street Suite 1020
Pittsburgh, PA 15222
ph. 412.281.2892 || fax 412.281.3054
www.womenslawproject.org

To: [REDACTED] spm@census.gov
Subject: Supplemental Poverty Measure Letter of Support
Date: 06/25/2010 01:39 PM
Attachments: [SPM Comments HSA 6 24 10.doc](#)

Please see the attached letter of support regarding comments on the Interagency Technical Working Group's approach to developing a Supplemental Poverty Measure (SPM).

*Stephanie Perrier
Executive Secretary to the Agency Director
San Mateo County
Human Services Agency
1 Davis Drive
Belmont, CA. 94002
phone: (650) 802-7509
fax: (650) 631-5771
sperrier@smchsa.org
www.smchsa.org*

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To: spm@census.gov
Subject: Supplemental Poverty Measure
Date: 06/21/2010 03:58 PM

Megan Kiesel
1207 Chestnut Street, 5th Floor
Philadelphia, PA 19107

June 21, 2010

David Johnson
4600 Silver Hill Road
Stop
Washington, DC 20233

Dear David Johnson:

We commend the work of the Census Bureau, BLS, and others who produced the recently released report: Observations from the Interagency Technical Working Group on Developing a Supplemental Poverty Measure. The proposed SPM is vast improvement over the official poverty measure.

Yet, it would be even better if it recognized that a certain level of basic savings and insurance is necessary to help families weather financial shocks and set aside a limited amount of prudent savings for such future needs as their retirement and the education of their children.

Research shows that when confronted with job loss and other adverse events, families with lower levels of liquid assets experience greater hardship and are more likely to resort to public benefits.

The measure could account for these needs by subtracting spending on basic savings, education and health insurance from income (something that is currently done for work-related child care), and adjusting the thresholds upward.

We thank you for your leadership to improve our measures of poverty in the United States.

Sincerely,

Megan Kiesel

To: spm@census.gov
Subject: Supplemental Poverty Measure
Date: 06/21/2010 05:53 PM

Kay Hixson
1250 4th St., SW, W-500
Washington, DC 20024-2339

June 21, 2010

David Johnson
4600 Silver Hill Road
Stop
Washington, DC 20233

Dear David Johnson:

We commend the work of the Census Bureau, BLS, and others who produced the recently released report: Observations from the Interagency Technical Working Group on Developing a Supplemental Poverty Measure. The proposed SPM is vast improvement over the official poverty measure.

Yet, it would be even better if it recognized that a certain level of basic savings and insurance is necessary to help families weather financial shocks and set aside a limited amount of prudent savings for such future needs as their retirement and the education of their children.

Research shows that when confronted with job loss and other adverse events, families with lower levels of liquid assets experience greater hardship and are more likely to resort to public benefits.

The measure could account for these needs by subtracting spending on basic savings, education and health insurance from income (something that is currently done for work-related child care), and adjusting the thresholds upward.

We thank you for your leadership to improve our measures of poverty in the United States.

Sincerely,

Kay Hixson

To: spm@census.gov
Subject: Supplemental Poverty Measure
Date: 06/21/2010 06:38 PM

Timothy Cole
157 Whitney St, Apt. 2
Hartford, CT 06105-2268

June 21, 2010

David Johnson
4600 Silver Hill Road
Stop
Washington, DC 20233

Dear David Johnson:

We commend the work of the Census Bureau, BLS, and others who produced the recently released report: Observations from the Interagency Technical Working Group on Developing a Supplemental Poverty Measure. The proposed SPM is vast improvement over the official poverty measure.

Yet, it would be even better if it recognized that a certain level of basic savings and insurance is necessary to help families weather financial shocks and set aside a limited amount of prudent savings for such future needs as their retirement and the education of their children.

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We thank you for your leadership to improve our measures of poverty in the United States.

Sincerely,

Timothy Cole

To: spm@census.gov
Subject: Supplemental Poverty Measure
Date: 06/22/2010 01:23 AM

Richard Tonsing
4742 Bamboo Way
Fair Oaks, CA 95628-6041

June 22, 2010

David Johnson
4600 Silver Hill Road
Stop
Washington, DC 20233

Dear David Johnson:

We commend the work of the Census Bureau, BLS, and others who produced the recently released report: Observations from the Interagency Technical Working Group on Developing a Supplemental Poverty Measure. The proposed SPM is vast improvement over the official poverty measure.

Yet, it would be even better if it recognized that a certain level of basic savings and insurance is necessary to help families weather financial shocks and set aside a limited amount of prudent savings for such future needs as their retirement and the education of their children.

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We thank you for your leadership to improve our measures of poverty in the United States.

Sincerely,

Richard Tonsing
916 436 1403

To: spm@census.gov
Subject: Supplemental Poverty Measure
Date: 06/22/2010 10:08 AM

Ross Yednock
1000 South Washington Avenue, Suite 101
Lansing, MI 48910-1647

June 22, 2010

David Johnson
4600 Silver Hill Road
Stop
Washington, DC 20233

Dear David Johnson:

I am the director of the Asset Building Policy Project at the Community Economic Development Association of Michigan (CEDAM). In this capacity, I coordinate the work of the Michigan Asset Building Coalition, a group of advocates, practitioners and concerned citizens dedicated to helping ensure all Michigan families have access to opportunities that help them achieve financial security through savings and asset building.

CEDAM commends the work of the Census Bureau, BLS, and others who produced the recently released report: Observations from the Interagency Technical Working Group on Developing a Supplemental Poverty Measure. The proposed SPM is vast improvement over the official poverty measure.

Yet, it would be even better if it recognized that a certain level of basic savings and insurance is necessary to help families weather financial shocks and set aside a limited amount of prudent savings for such future needs as their retirement and the education of their children.

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The measure could account for these needs by subtracting spending on basic savings, education and health insurance from income (something that is currently done for work-related child care), and adjusting the thresholds upward. This is critical, as it would make for a more accurate accounting of how best a family can break the reigns of cyclical poverty!

We thank you for your leadership to improve our measures of poverty in the United States. If you have any questions regarding this, please do not hesitate to contact me.

Sincerely, rhy

Ross H. Yednock
5174853588

To: spm@census.gov
Subject: Supplemental Poverty Measure
Date: 06/22/2010 11:53 AM

Joel Larson
301 Industrial Avenue
Lakeport, CA 95453-5643

June 22, 2010

David Johnson
4600 Silver Hill Road
Stop
Washington, DC 20233

Dear David Johnson:

We commend the work of the Census Bureau, BLS, and others who produced the recently released report: Observations from the Interagency Technical Working Group on Developing a Supplemental Poverty Measure. The proposed SPM is vast improvement over the official poverty measure.

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We thank you for your leadership to improve our measures of poverty in the United States.

Sincerely,

Joel Larson

To: spm@census.gov
Subject: Supplemental Poverty Measure
Date: 06/22/2010 12:48 PM

Malgorzata Tomaszewska
20 Linden St.
Allston, MA 02134-1711

June 22, 2010

David Johnson
4600 Silver Hill Road
Stop
Washington, DC 20233

Dear David Johnson:

We commend the work of the Census Bureau, BLS, and others who produced the recently released report: Observations from the Interagency Technical Working Group on Developing a Supplemental Poverty Measure. The proposed SPM is vast improvement over the official poverty measure.

Yet, it would be even better if it recognized that a certain level of basic savings and insurance is necessary to help families weather financial shocks and set aside a limited amount of prudent savings for such future needs as their retirement and the education of their children.

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We thank you for your leadership to improve our measures of poverty in the United States.

Sincerely,

Malgorzata Tomaszewska

To: spm@census.gov
Subject: Supplemental Poverty Measure
Date: 06/22/2010 01:13 PM

Kate Brewster
The Poverty Institute, 600 Mt Pleasant Avenue
Providence, RI 02908

June 22, 2010

David Johnson
4600 Silver Hill Road
Stop
Washington, DC 20233

Dear David Johnson:

We commend the work of the Census Bureau, BLS, and others who produced the recently released report: Observations from the Interagency Technical Working Group on Developing a Supplemental Poverty Measure. The proposed SPM is vast improvement over the official poverty measure.

Yet, it would be even better if it recognized that a certain level of basic savings and insurance is necessary to help families weather financial shocks and set aside a limited amount of prudent savings for such future needs as their retirement and the education of their children.

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We thank you for your leadership to improve our measures of poverty in the United States.

Sincerely,

Kate Brewster, Executive Director, The Poverty Institute
401-456-8239

To: spm@census.gov
Subject: Supplemental Poverty Measure
Date: 06/22/2010 03:03 PM

Colleen Dailey
904 Jackson St. NE
Washington, DC 20017-3412

June 22, 2010

David Johnson
4600 Silver Hill Road
Stop
Washington, DC 20233

Dear David Johnson:

We commend the work of the Census Bureau, BLS, and others who produced the recently released report: Observations from the Interagency Technical Working Group on Developing a Supplemental Poverty Measure. The proposed SPM is vast improvement over the official poverty measure.

Yet, it would be even better if it recognized that a certain level of basic savings and insurance is necessary to help families weather financial shocks and set aside a limited amount of prudent savings for such future needs as their retirement and the education of their children.

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We thank you for your leadership to improve our measures of poverty in the United States.

Sincerely,

Colleen Dailey

To: spm@census.gov
Subject: Supplemental Poverty Measure
Date: 06/22/2010 07:08 PM

Denise Walker
15226 Ingleside
South Holland, IL 60473-1152

June 22, 2010

David Johnson
4600 Silver Hill Road
Stop
Washington, DC 20233

Dear David Johnson:

We commend the work of the Census Bureau, BLS, and others who produced the recently released report: Observations from the Interagency Technical Working Group on Developing a Supplemental Poverty Measure. The proposed SPM is vast improvement over the official poverty measure.

Yet, it would be even better if it recognized that a certain level of basic savings and insurance is necessary to help families weather financial shocks and set aside a limited amount of prudent savings for such future needs as their retirement and the education of their children.

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We thank you for your leadership to improve our measures of poverty in the United States.

Sincerely,

Denise Walker
7732602876

To: spm@census.gov
Subject: Supplemental Poverty Measure
Date: 06/22/2010 09:13 PM

david bohn
1 IhoIho Place, #310A
wahiawa, HI 96786-2388

June 22, 2010

David Johnson
4600 Silver Hill Road
Stop
Washington, DC 20233

Dear David Johnson:

We commend the work of the Census Bureau, BLS, and others who produced the recently released report: Observations from the Interagency Technical Working Group on Developing a Supplemental Poverty Measure. The proposed SPM is vast improvement over the official poverty measure.

Yet, it would be even better if it recognized that a certain level of basic savings and insurance is necessary to help families weather financial shocks and set aside a limited amount of prudent savings for such future needs as their retirement and the education of their children.

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We thank you for your leadership to improve our measures of poverty in the United States.

Sincerely,

david bohn

To: spm@census.gov
Subject: Supplemental Poverty Measure
Date: 06/21/2010 04:03 PM

Kevin Kelly
901 S. Highland St.
Arlington, VA 22204-2400

June 21, 2010

David Johnson
4600 Silver Hill Road
Stop
Washington, DC 20233

Dear David Johnson:

We commend the work of the Census Bureau, BLS, and others who produced the recently released report: Observations from the Interagency Technical Working Group on Developing a Supplemental Poverty Measure. The proposed SPM is vast improvement over the official poverty measure.

Yet, it would be even better if it recognized that a certain level of basic savings and insurance is necessary to help families weather financial shocks and set aside a limited amount of prudent savings for such future needs as their retirement and the education of their children.

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The measure could account for these needs by subtracting spending on basic savings, education and health insurance from income (something that is currently done for work-related child care), and adjusting the thresholds upward.

We thank you for your leadership to improve our measures of poverty in the United States.

Sincerely,

Kevin Kelly
703-685-0510

To: spm@census.gov
Subject: Supplemental Poverty Measure
Date: 06/23/2010 01:08 PM

Laura Paulen
120 Sixth Ave N
Seattle, WA 98109-5002

June 23, 2010

David Johnson
4600 Silver Hill Road
Stop
Washington, DC 20233

Dear David Johnson:

We commend the work of the Census Bureau, BLS, and others who produced the recently released report: Observations from the Interagency Technical Working Group on Developing a Supplemental Poverty Measure. The proposed SPM is vast improvement over the official poverty measure.

Yet, it would be even better if it recognized that a certain level of basic savings and insurance is necessary to help families weather financial shocks and set aside a limited amount of prudent savings for such future needs as their retirement and the education of their children.

Research shows that when confronted with job loss and other adverse events, families with lower levels of liquid assets experience greater hardship and are more likely to resort to public benefits.

In my work with the Seattle Asset Building Initiative at Seattle Housing Authority, I see first hand how a lack of assets (savings, good credit, etc) traps people in the cycle of poverty. While many of the low-income public housing residents that I work with are making a concerted effort to improve their lives, they don't have any assets to weather emergencies so one life event (like getting laid off or receiving a bill for emergency care without health insurance) can set them back, erasing any progress that they had gained. Assets are an integral measure of one's ability to build wealth and move up the economic ladder and a poverty measure should include such an indicator.

The measure could account for these needs by subtracting spending on basic savings, education and health insurance from income (something that is currently done for work-related child care), and adjusting the thresholds upward.

We thank you for your leadership to improve our measures of poverty in the United States.

Sincerely,

Laura Paulen



Subject:



Supplemental Poverty Measure

Date:

06/23/2010 06:31 PM

Assets such as savings health insurance and money for education are vital if families are going to achieve any economic success in the United States. Please let families keep these assets and not punish them for their hard work. Mahalo, Mary Hyslop

Mary Hyslop, Executive Director
Neighborhood Place of Puna
PO Box 2020
Pahoa HI 96778
Phone 965-5550 Fax 965-5109
www.neighborhoodplaceofpuna.org

To Nurture, Strengthen and Celebrate 'Ohana

Confidential: This message is intended for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential and exempt from disclosure. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is prohibited. Thank you.

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To: spm@census.gov
Subject: Supplemental Poverty Measure
Date: 06/24/2010 11:53 AM

Haley Richards
1110 North Reus Street
Pensacola, FL 32501-3021

June 24, 2010

David Johnson
4600 Silver Hill Road
Stop
Washington, DC 20233

Dear David Johnson:

We commend the work of the Census Bureau, BLS, and others who produced the recently released report: Observations from the Interagency Technical Working Group on Developing a Supplemental Poverty Measure. The proposed SPM is vast improvement over the official poverty measure.

Yet, it would be even better if it recognized that a certain level of basic savings and insurance is necessary to help families weather financial shocks and set aside a limited amount of prudent savings for such future needs as their retirement and the education of their children.

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We thank you for your leadership to improve our measures of poverty in the United States.

Sincerely,

Haley Richards
850-438-4214

To: spm@census.gov
Subject: Supplemental Poverty Measure
Date: 06/24/2010 07:01 PM

Amy Fidelis
50 Clarkson St. Apt. 105
Denver, CO 80218-3755

June 24, 2010

David Johnson
4600 Silver Hill Road
Stop
Washington, DC 20233

Dear David Johnson:

We commend the work of the Census Bureau, BLS, and others who produced the recently released report: Observations from the Interagency Technical Working Group on Developing a Supplemental Poverty Measure. The proposed SPM is vast improvement over the official poverty measure.

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We thank you for your leadership to improve our measures of poverty in the United States.

Sincerely,

Amy Fidelis

To: spm@census.gov
Subject: Supplemental Poverty Measure
Date: 06/24/2010 08:56 PM

Sandra Boone
2501 Lowry Ave. NE Lot I-27
St. Anthony Village, MN 55418-0049

June 24, 2010

David Johnson
4600 Silver Hill Road
Stop
Washington, DC 20233

Dear David Johnson:

We commend the work of the Census Bureau, BLS, and others who produced the recently released report: Observations from the Interagency Technical Working Group on Developing a Supplemental Poverty Measure. The proposed SPM is vast improvement over the official poverty measure.

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We thank you for your leadership to improve our measures of poverty in the United States.

Sincerely,

Sandra D. Boone
612-782-6813

To: spm@census.gov
Subject: Supplemental Poverty Measure
Date: 06/25/2010 07:46 AM

Lorraine Brower
1410 asbury ave apt 2w
Asbury Park, NJ 07712-5702

June 25, 2010

David Johnson
4600 Silver Hill Road
Stop
Washington, DC 20233

Dear David Johnson:

We commend the work of the Census Bureau, BLS, and others who produced the recently released report: Observations from the Interagency Technical Working Group on Developing a Supplemental Poverty Measure. The proposed SPM is vast improvement over the official poverty measure.

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We thank you for your leadership to improve our measures of poverty in the United States.

Sincerely,

Lorraine Brower
8484689045



Subject:



Supplemental Poverty Measure

Date:

06/25/2010 05:03 PM

Attachments:

[spm letter.pdf](#)

Please see the attached comments to the Census Bureau from the City of Newark, New Jersey relating to Supplemental Poverty Measure methodology.

Thank you.

To: spm@census.gov
Subject: Supplemental Poverty Measure
Date: 06/26/2010 12:56 AM

Dory Rand
29 E. Madison, Suite 1710
Chicago, IL 60602-4566

June 26, 2010

David Johnson
4600 Silver Hill Road
Stop
Washington, DC 20233

Dear David Johnson:

Woodstock Institute is a leading nonprofit research and policy organization focused on fair lending, wealth creation, and financial systems reform at the state and federal levels on behalf of lower-wealth persons and communities of color.

We commend the work of the Census Bureau, BLS, and others who produced the recently released report: Observations from the Interagency Technical Working Group on Developing a Supplemental Poverty Measure. The proposed SPM is vast improvement over the official poverty measure.

Yet, it would be even better if it recognized that a certain level of basic savings and insurance is necessary to help families weather financial shocks and set aside a limited amount of prudent savings for such future needs as their retirement and the education of their children.

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We thank you for your leadership to improve our measures of poverty in the United States.

Sincerely,

Dory Rand
312-368-0310

To: spm@census.gov
Subject: Supplemental Poverty Measure
Date: 06/28/2010 01:51 PM

Ferol Beer
6440 Hillcroft #411
Houston, TX 77081-3104

June 28, 2010

David Johnson
4600 Silver Hill Road
Stop
Washington, DC 20233

Dear David Johnson:

We commend the work of the Census Bureau, BLS, and others who produced the recently released report: Observations from the Interagency Technical Working Group on Developing a Supplemental Poverty Measure. The proposed SPM is vast improvement over the official poverty measure.

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We thank you for your leadership to improve our measures of poverty in the United States.

Sincerely,

Ferol Beer
713-776-4700

To: spm@census.gov
Subject: Supplemental Poverty Measure
Date: 06/21/2010 04:08 PM

Kathryn Goulding
355 20th Ave., #3
San Francisco, CA 94121-2204

June 21, 2010

David Johnson
4600 Silver Hill Road
Stop
Washington, DC 20233

Dear David Johnson:

We commend the work of the Census Bureau, BLS, and others who produced the recently released report: Observations from the Interagency Technical Working Group on Developing a Supplemental Poverty Measure. The proposed SPM is vast improvement over the official poverty measure.

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We thank you for your leadership to improve our measures of poverty in the United States.

Sincerely,

Kathryn Gwatkin Goulding

To: spm@census.gov
Subject: Supplemental Poverty Measure
Date: 06/21/2010 04:18 PM

Renee Getreu
403 Berry St.
Mt. Shasta, CA 96067-2502

June 21, 2010

David Johnson
4600 Silver Hill Road
Stop
Washington, DC 20233

Dear David Johnson:

We commend the work of the Census Bureau, BLS, and others who produced the recently released report: Observations from the Interagency Technical Working Group on Developing a Supplemental Poverty Measure. The proposed SPM is vast improvement over the official poverty measure.

Yet, it would be even better if it recognized that a certain level of basic savings and insurance is necessary to help families weather financial shocks and set aside a limited amount of prudent savings for such future needs as their retirement and the education of their children.

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We thank you for your leadership to improve our measures of poverty in the United States.

Sincerely,

Renee Getreu
530-926-6670

To: spm@census.gov
Subject: Supplemental Poverty Measure
Date: 06/21/2010 04:48 PM

Robert J. Ransom, Jr. - ChFC
820 Cindy Ln.
Petaluma, CA 94952-2004

June 21, 2010

David Johnson
4600 Silver Hill Road
Stop
Washington, DC 20233

Dear David Johnson:

We commend the work of the Census Bureau, BLS, and others who produced the recently released report: Observations from the Interagency Technical Working Group on Developing a Supplemental Poverty Measure. The proposed SPM is vast improvement over the official poverty measure.

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We thank you for your leadership to improve our measures of poverty in the United States.

Sincerely,

Robert J. Ransom, Jr. - ChFC

To: spm@census.gov
Subject: Supplemental Poverty Measure
Date: 06/21/2010 05:08 PM

Marcia Shobe
4184 W Mossy Rock Drive
Fayetteville, AR 72704-6392

June 21, 2010

David Johnson
4600 Silver Hill Road
Stop
Washington, DC 20233

Dear David Johnson:

We commend the work of the Census Bureau, BLS, and others who produced the recently released report: Observations from the Interagency Technical Working Group on Developing a Supplemental Poverty Measure. The proposed SPM is vast improvement over the official poverty measure.

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We thank you for your leadership to improve our measures of poverty in the United States.

Sincerely,

Marcia Shobe
4798791761

To: spm@census.gov
Subject: Supplemental Poverty Measure
Date: 06/21/2010 05:18 PM

Donna Gallagher
P. O. Box 27386
Raleigh, NC 27611-7386

June 21, 2010

David Johnson
4600 Silver Hill Road
Stop
Washington, DC 20233

Dear David Johnson:

We commend the work of the Census Bureau, BLS, and others who produced the recently released report: Observations from the Interagency Technical Working Group on Developing a Supplemental Poverty Measure. The proposed SPM is vast improvement over the official poverty measure.

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The measure could account for these needs by subtracting spending on basic savings, education and health insurance from income (something that is currently done for work-related child care), and adjusting the thresholds upward.

We thank you for your leadership to improve our measures of poverty in the United States.

Sincerely,

Donna Gallagher
919-341-6418

To: spm@census.gov
Subject: Supplemental Poverty Measure
Date: 06/21/2010 05:23 PM

Lisa Gabbard
P.O. Box 356
Frankfort, KY 40602-0356

June 21, 2010

David Johnson
4600 Silver Hill Road
Stop
Washington, DC 20233

Dear David Johnson:

We commend the work of the Census Bureau, BLS, and others who produced the recently released report: Observations from the Interagency Technical Working Group on Developing a Supplemental Poverty Measure. The proposed SPM is vast improvement over the official poverty measure.

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The measure could account for these needs by subtracting spending on basic savings, education and health insurance from income (something that is currently done for work-related child care), and adjusting the thresholds upward.

We thank you for your leadership to improve our measures of poverty in the United States.

Sincerely,

Lisa Gabbard
502-209-5382

To: spm@census.gov
Subject: Supplemental Poverty Measure
Date: 06/21/2010 05:48 PM

Kristen Zehner
118 Blue Spruce
Marshall, WI 53559-9207

June 21, 2010

David Johnson
4600 Silver Hill Road
Stop
Washington, DC 20233

Dear David Johnson:

We commend the work of the Census Bureau, BLS, and others who produced the recently released report: Observations from the Interagency Technical Working Group on Developing a Supplemental Poverty Measure. The proposed SPM is a vast improvement over the official poverty measure.

Yet, it would be even better if it recognized that a certain level of basic savings and insurance is necessary to help families weather financial shocks and set aside a limited amount of prudent savings for such future needs as their retirement and the education of their children.

Research shows that when confronted with job loss and other adverse events, families with lower levels of liquid assets experience greater hardship and are more likely to resort to public benefits.

The measure could account for these needs by subtracting spending on basic savings, catastrophic rent payments, education and health insurance from income (something that is currently done for work-related child care), and adjusting the thresholds upward.

We thank you for your leadership to improve our measures of poverty relief in the United States.

Sincerely,

Kristen Zehner
6086554573

To: spm@census.gov
Subject: Supplemental Poverty Measure
Date: 06/02/2010 04:27 PM

I would suggest that the census consider work completed by the Center for Neighborhood Technology on the real cost of housing when transportation costs are added. Their study indicates that the increases in the cost of fuel have had as much impact on foreclosures as too many “drive until they qualify” for a mortgage and then the cost cannot be sustained as fuel costs rise. The study can be found at www.cnt.org.

Terri Blackmore, Executive Director
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that say poverty measures should reflect the cost of food, clothing, shelter and utilities, out-of-pocket medical expenses and costs associated with employment. New York City's guidelines have resulted in identifying about twice as many people living in poverty in NYC as the federal measure does, and many of these impoverished are women and children. Unfortunately, these guidelines only address New York City and have no impact on eligibility for many federally generated benefits and entitlements. As a result, the City acknowledges that people are living in poverty, but its hands are tied in actually giving them any relief. It is only through changes in the federal guidelines that this will occur.

Again, we thank you for the opportunity to comment and look forward to your response.

Sincerely,

Barbara Zucker, Vice President for Public Policy

Elizabeth Lubetkin Lipton, Chair, Poverty Task Force

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To: spm@census.gov
Subject: Poverty Measure Letter to Census_ss.doc
Date: 07/20/2010 06:04 PM
Attachments: [Poverty Measure Letter to Census_ss.doc](#)

Mr.. Johnson,

I am submitting comments on the Supplemental Poverty Measures in behalf of the Center for Neighborhood Technology. If you would like further information you can either contact me or our President Scott Bernstein. My number is 773-269-4033 and Scott is 773-269-4035.

Jacky Grimshaw