

May 11, 2023

The Honorable Robert Santos
Director
U.S. Census Bureau
4600 Silver Hill Road
Washington, D.C. 20233

Dear Director Santos:

I write to express deep concern about a National Academy of Sciences (NAS) “consensus study” that was commissioned by the Census Bureau to improve the supplemental poverty measure (SPM). The report, “An Updated Measure of Poverty: (Re)Drawing the Line,” recommends a sweeping set of changes that would prevent our government from accurately measuring poverty and would instead advance progressive political priorities. The authors of this report have not only overstepped their commission, but have also broken a sacred trust long defining the relationship between research experts and policymakers. I urge you to not elevate the SPM to the government’s “principal” poverty measure, and instead to take immediate corrective action by requiring NAS to assemble a nonpartisan and ideologically balanced panel of experts to author a new report.

Few policy efforts are more important than ensuring all Americans have the opportunity to build a great life for themselves and their families. For this reason, Congress has established many programs to help low-income families chart a path out of poverty and toward dignified work. Accurate poverty measures are crucial tools because they allow policymakers to evaluate whether efforts to increase opportunity for families are working. Recognizing this importance, Congress and the executive branch have frequently solicited advice from academic experts on important technical matters related to the measurement of poverty.

Ever since the development of the official poverty measure (OPM) in 1965, in which policymakers relied heavily on the advice of economist Mollie Orshansky, these partnerships have relied on a mutual understanding that, at the heart of every poverty measure is a list of questions that can only be answered by elected representatives. Poverty measures, in other words, are not purely technical instruments. They signal a national consensus about the goals of our economy and system of government. As the authors of the 1995 NAS report that prompted the current SPM stated: “specifying a poverty line is the most judgmental of all aspects of a poverty measure, and we did not think it appropriate for us to make that final, ultimately political, judgement.”

Unfortunately, the authors of “An Updated Measure of Poverty” have forsaken the wisdom of their predecessors in favor of political activism masquerading as technical expertise. Perhaps worst of all is the group’s recommendation that “the Supplemental Poverty Measure should be elevated to the nation’s headline poverty statistic and renamed accordingly.” This

recommendation clearly exceeds the group's commission from the Census Bureau, which charged the group to "assess the strengths and shortcomings of the current SPM and, if needed, to recommend changes." It is not the place for social scientists to decide which poverty measure the Federal Government should designate as our "principal" measure, nor did the Census Bureau indicate this in its commission.

In addition to this presumptuous recommendation, I am disappointed by the group's proposal to add several complicating variables to the SPM's threshold, including childcare and health insurance. These changes would significantly increase the complexity of a threshold that already yields more than 46,000 different definitions of poverty, reducing transparency and confusing our national consensus on what we mean by "poverty."

It is obvious the panel added these factors to align the definition of poverty with longstanding progressive political priorities. For example, the incorporation of healthcare in the poverty threshold prompted the authors to propose the Affordable Care Act's definition of "health care needs" as the standard. Furthermore, the authors' assertion that "all households with children have a need for childcare" prompted an indefensible attempt to force the treatment of households into a center-based childcare framework and assign arbitrary monetary values to parents' efforts to care for and raise their children, even if they choose a family-centered approach. Most importantly, the authors failed to demonstrate how adding these variables could improve the SPM's ability to identify struggling families. Instead, the report appeals to "expert judgement" as a blanket justification for prioritizing some goods over others.

The obvious bias of these proposals offers sufficient reason for concern. I am most troubled, however, by the NAS's apathy toward the glaring ideological imbalance of the panel it selected to author this report. The NAS claims to maintain strict "institutional standards for quality, objectivity, evidence, and responsiveness." However, a review of Federal Election Commission records revealed that panel members have donated nearly \$110,000 to Democratic candidates and causes and \$0 to Republican candidates and causes. The panel includes several members of President Obama's Council of Economic Advisors, a former Democratic Ways and Means Staffer, and an advisor on President Obama's transition team. None of the panelists had a record of public service for Republican politicians or conservative organizations. In light of these facts, it is hard to see how any individual could reasonably estimate the composition of the panel meets the NAS' purported standard of "objectivity."

If past is prologue, there is no reason to think the NAS will correct the glaring bias of its report without decisive leadership from the Census Bureau. Take, for example, the NAS' response to a letter from renowned poverty scholars Bruce Meyer and Kevin Corinth, who identified an important analysis error in a 2019 report that estimated the potential effects of a child allowance. Rather than directly addressing the numerous substantive academic concerns raised by Meyer and Corinth, NAS simply issued a vague statement on its website stating that "a single working paper does not change the conclusions drawn from extensive published literature, nor does it mean that the estimates in A Roadmap to Reducing Child Poverty are in error."

Given the concerning nature of the NAS report, as well as the NAS' history of willful blindness toward the political bias of its own recommendations, I urge you to take decisive and

immediate corrective action. The Census Bureau should not elevate the SPM to the government's "principal" poverty measure, and should instead require the NAS to assemble a new, politically balanced panel to propose an updated set of recommendations. This new panel must receive clear guidance from the Census Bureau regarding the nature of its role in relation to the political process—with explicit instruction to focus on technical improvements rather than political pronouncements. Anything less would amount to a dereliction of our duty to safeguard a transparent, fair system of governance for American families, especially Americans in poverty.

Thank you for your prompt attention to this important matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "M. Rubio", with a stylized flourish at the end.

Marco Rubio
U.S. Senator