June 20, 2019

Nancy Potok, Chief Statistician
Office of Management and Budget
Statistical_Directives@omb.eop.gov
Re: Directive No. 14

Comments to OMB 2019-0002-0001
Request for Comment on the Consumer Inflation Measures Produced by Federal Statistical Agencies

Dear Ms. Potok:

We are writing to express our concerns about potentially replacing the Consumer Price Index for All Urban Consumers (CPI-U) with another measure of inflation such as the Chained Consumer Price Index for All Urban Consumers (C-CPI-U), or the Personal Consumption Expenditures Price Index (PCEPI). Over time, the proposed use of a lower measure of inflation would reduce or eliminate critical services including health, mental health, early education, legal aid, child welfare and nutrition services for thousands of Missourians.

While we appreciate the desire to update the mechanisms used to calculate the Census Bureau’s Official Poverty Measure to make it more meaningful, neither the C-CPI-U nor the PCEPI would adequately assess the status and well-being of lower-income Missourians.

Recent studies indicate that inflation is increasing at a faster rate for low-income households than for households overall. In particular, inflation measures such as the CPI-U do not adequately account for the fact that low-income households pay a higher proportion of their incomes on necessities such as housing and child care. The costs of these expenses have risen dramatically the past several decades — much faster than wages - making it extremely difficult for working families to get ahead and be financially self-sufficient. Lowering the calculation of poverty further, using the C-CPI-U or the PCEPI, would make the assessment of need even less accurate.

We recognize that OMB has not requested comments on the impact the proposed measures could have on the official Federal Poverty Guidelines (often referred to as the Federal Poverty Level) developed by the U.S Department of Health & Human Services (HHS). However, the poverty guidelines developed by HHS take their lead from the OMB threshold and would impact numerous federal, state and local government programs including access for Medicaid, CHIP, Child Care and Early Education, SNAP, WIC, and School Meals. By using a lower measure of inflation, the calculation of need used to determine

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eligibility for these programs would significantly reduce over time, impacting tens of thousands of Missourians.

Any proposed change to how poverty is calculated should undergo thorough research and analysis, and solicit public comments regarding the policy’s potential impact on low- and moderate-income households. We oppose any change that would worsen the economic and health conditions of Missourians.

Please contact Amy Blouin, Missouri Budget Project at ablouin@mobudget.org with any questions.

Respectfully submitted on behalf of the following organizations:

Lisa Knoll, CEO
Aging Ahead

Lauri Massey, MSW LCSW
Director of Quality & Compliance
AIDS Project of the Ozarks

Tamara Kenny, JD, MSW
Director of Advocacy and Community Engagement
Catholic Charities of St. Louis

Maxine Clark, Chief Inspirator
The Delmar DivinNe

Jill Ainsworth, Attorney and Counselor at Law
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Bruce A. Eddy PhD, Executive Director
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Jeanette Mott Oxford, Executive Director
Empower Missouri

Shelby Butler, Community Outreach Coordinator
empower: abilities

Abby Buckhouse, Manager, Policy and Advocacy
Generate Health

Michael Meehan, Executive Director
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Casey Hanson, Director of Outreach and Engagement
Kids Win Missouri

Nancy J Miller & Louise T Wilkerson, Co-Presidents; and Jean Dugan, Executive Director
League of Women Voters of Metro St. Louis

Evelyn Maddox, President
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Kaitee Brown, Director, Attorney
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Alice Kitchen
Loretto Community Kansas City

Margo Smith
Missouri Association for Infant and Early Childhood Mental Health (MOAIMH-EC)

Scott Kimble, Director of Legislative Advocacy
Missouri Association of School Administrators
Amy Blouin, President & CEO  
Missouri Budget Project

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Public Policy Director  
Missouri Coalition Against Domestic and Sexual Violence (MOCADSV)

Jessica Hoey, Director of Public Affairs and Community Engagement  
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Caitlyn Adams, Executive Director  
Missouri Jobs with Justice

Jessica Seitz, Director of Public Policy  
Missouri Kids First

Heidi Lucas, State Director  
Missouri Nurses Association

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Missouri PTA

Dianna Fine, State Policy Advocacy Chair and Ellen Alper, Executive Director  
National Council of Jewish Women-St. Louis

Kari Rinker, MPA, Senior Manager, Advocacy Kansas, Missouri and Oklahoma  
National Multiple Sclerosis Society

Sister Quincy Howard, OP  
Network

Sarah Swearer, Manager of Public Policy  
Operation Food Search

Kim Lackey, Director of Public Policy and Advocacy  
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Mark Sanford, Executive Administrator  
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Brenda R. Sharpe, President & CEO  
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Tom Duff, Executive Director  
Saint Louis Counseling

Karen Wallensak, Executive Director  
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Jessica Adams, Executive Director  
St. Louis Area Diaper Bank

Colleen Polak  
St. Louis Child Abuse and Neglect Network

Michelle Schiller-Baker, Executive Director  
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Laurie Phillips, Chief Executive Officer  
St. Patrick Center

Ruth Ehresman, Advocacy Coordinator  
Vision for Children at Risk

Linda Zazove, Co-President  
Women's Voices Raised for Social Justice

cc:  
The Honorable Roy Blunt  
The Honorable Josh Hawley