As an economic researcher and policy analyst, I am excited to learn of this new data tool. I would like to suggest that another measure of income adequacy be included in place of, or in addition to, 200% of the federal poverty level.

As you are aware, the federal poverty level is an outdated standard that no longer reflects the true cost of living, particularly in high-cost regions. Doubling the federal standard gives a better approximation of income adequacy but does not address the measure's fundamental flaws.

The ideal measure would be one such as the Self-Sufficiency Standard (see See http://www.insightced.org/communities/cfess/ca-sss.html and http://www.selfsufficiencystandard.org) which is based upon the actual current cost of staple goods and services in each county. However, calculating self-sufficiency levels for each ZIP code would be a time-consuming endeavor.

As an alternative, I suggest that you consider including the portion of the population with a high housing cost burden (spending 30% or more of household income on housing costs). Housing cost burden data is available at the ZIP code level through the U.S. Census Bureau’s American Community Survey.

Thank you for the opportunity to comment.

Sincerely,

Louise Auerhahn