

SUPPORTING STATEMENT A
Department of Commerce
U.S. Census Bureau
Paperwork Reduction Act Program
Information Collection Request
Collection of State Administrative Records Data
OMB Control Number 0607-XXXX

1. Necessity of the Information Collection

Under 13 U.S.C. § 6, the Census Bureau is authorized to acquire and use administrative records from state governments and the government of the District of Columbia when that information is pertinent to the Census Bureau's work; required for efficiently and economically conducting census and surveys; or in lieu of conducting direct inquiries when permissible.

The Census Bureau efforts to collect state administrative records data include integrating and linking the data with Census Bureau data from current surveys and censuses in order to improve efficiency and accuracy of Census data collections, including 2020 Census Operations, and improve measures of the population and economy. The Census Bureau benefits from these efforts by improving data quality, survey frames, developing model-based edits and allocations, and studies of program participation and data quality over time. Collaborating agencies have benefited through access to reports and tabulations to enhance information about participation in assistance programs.

The authority for the Census Bureau to acquire state administrative records data on nutrition assistance is 13 U.S.C. § 6. Additionally, the state agencies may provide Supplemental Nutrition Assistance Program (SNAP) and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) data to the Census Bureau under 7 U.S.C. § 2026 and 42 U.S.C. § 1786, respectively. Further, state agencies may provide Temporary Assistance for Needy Families (TANF) data to the Census Bureau under 42 U.S.C. § 613.

2. Needs and Uses

The Census Bureau will link State administrative records data with data from censuses and surveys at the Census Bureau, including but not limited to data from the Survey of Income and Program Participation (SIPP), Current Population Survey, and the American Community Survey.

Linking records across programs, across states, or over time is accomplished using a unique linkage identifier called a Protected Identification Key (PIK). Processing to assign a PIK to each person record involves matching based on combinations of name, address, sex, date of birth, and Social Security Number (SSN) data, as available. The Census Bureau requests the following data elements from the state agencies:

- a. Case unit identifiers,
- b. Complete monthly case unit address history (residence, mailing),
- c. History of benefit amounts received (monthly),
- d. Income reporting requirement (simplified reporting, change reporting, etc.),
- e. Gross income (monthly),
- f. Net income (monthly),
- g. Eligibility and denial information,
- h. Identifiers for individuals in case units, and
- i. The following information on individuals in a case unit:
 - i. Name
 - ii. Social Security Number
 - iii. Case unit/main contact phone number
 - iv. Relationship to primary recipient
 - v. Race
 - vi. Hispanic origin/Ethnicity
 - vii. Sex
 - viii. Date of birth
 - ix. Education
 - x. Employment
 - xi. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)
 - xii. History of membership in case unit

The Census Bureau will use nutrition assistance data to improve surveys and census authorized by Title 13 of the United States Code. The Census Bureau will evaluate the quality of the linked data to: improve efficiency and accuracy in our data collections; improve measures of population and economy; evaluate and improve data linking software and techniques; improve data quality and estimates; improve Census Bureau household survey coverage and gain a greater understanding of data quality collected in Census Bureau household surveys on program participation, household composition and income; and provide a basis for improving Census Bureau demographic survey program participation questions.

The Census Bureau will return tabulated data to the participating state agencies. This information will help the state agencies develop better measures of poverty, analyze the demographic characteristics of participants, review enrollment rates for those eligible for assistance, and analyze the effects of state programs on a variety of outcomes.

Data sharing and analysis of linked files are solely for statistical purposes, not for program enforcement or the determination of individual benefits. All State administrative records data are and will remain confidential, whether in their original form or when comingled or linked. Information quality is an integral part of the pre-dissemination review of the information disseminated by the Census Bureau (fully described in the Census Bureau's Information Quality Guidelines). Information quality is also integral to the information collections conducted by the

Census Bureau and is incorporated into the clearance process required by the Paperwork Reduction Act.

3. Use of Information Technology

The state agency will transfer state administrative records to the Census Bureau via secure File Transfer Protocol or appropriately encrypted CD-ROM or DVD-ROM.

4. Efforts to Identify Duplication

The Census Bureau is uniquely qualified to do this work based on its capacity to assign unique identifiers to files that facilitate linkage across files. As such, there is no duplication of effort for this approach either outside the Census Bureau or from other areas within the Census Bureau.

5. Minimizing Burden

Small businesses or other small entities do not provide information.

6. Consequences of Less Frequent Collection

Collection of the state administrative records data will occur annually. Any less frequent collection may result in less accurate data coverage and estimates, and lack of data to manage programs and surveys.

7. Special Circumstances

No special circumstances.

8. Consultations Outside of Agency

The Census Bureau has collaborated with the USDA ERS and the USDA FNS to gain their insight into the availability and utility of administrative records from state programs.

A notice was published in the *Federal Register* on May 11, 2016, Vol. 81, Document Number 2016-11059, Pages 29250 – 29251, inviting public comment on our plans to submit this request. No public comments were received in response to the published notice.

Additionally, the Census has hired a Senior Research Fellow in the Center for Administrative Records Research and Applications (CARRA), within the Research and Methodology (R&M) Directorate of the US Census Bureau. This person has worked collaboratively with Census Bureau staff furthering Census Bureau objectives such as research into the use of administrative records for the 2020 Decennial Census. This Research Fellow has shared knowledge and experience identifying and acquiring state administrative records with R&M, 2020 Decennial Census and other Census Bureau staff as necessary.

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9. Paying Respondents

No gifts will be provided to the participating state agencies. The Census Bureau offers state program agencies \$10,000.00 per data type for reimbursement of the costs incurred by the state to extract the data.

10. Assurance of Confidentiality

Once the Census Bureau acquires the data, these data are confidential under 13 U.S.C., Section 9. The Census Bureau agrees that any information will remain confidential, will not be disclosed in individually-identifiable form, and will be used solely for statistical purposes.

State administrative records data transmitted to the Census Bureau become a part of the Census Bureau's Census-8 Statistical Administrative Records System (StARS) and is covered in the Census-8 System of Records Notice. As such, these records are subject to all requirements and conditions of the Privacy Act of 1974.

When the Census Bureau publicly releases information or results pursuant to this agreement, it shall not identify any individual or business entity. All results shall meet the Census Bureau disclosure avoidance guidelines. Title 13 confidentiality protects the identities of individuals in all items provided in and derived from program data. Once the Census Bureau no longer needs the data, the Census Bureau destroys the data in accordance with strict protocols. The Census Bureau agrees to allow data providers the opportunity to verify that findings, listings, information derived, or any combination of data extracted or derived from program records properly protects the identities of individuals according to the standards applicable to Title 13 data. We inform respondents of this fact and that their responses are voluntary in an introductory email and formal letter (Attachment B and C).

11. Justification for Sensitive Questions

No sensitive questions will be asked.

12. Estimation of Hour Burden

There are potentially 51 respondents, each state and the District of Columbia. The Census Bureau and the state agency will discuss the research proposal, set up data sharing agreements, and arrange for the annual transfer of the data to the Census Bureau. This work is estimated to take approximately 75 hours based on previous experience obtaining these types of state agreements. Based on median earnings for state government employees, the estimated total annual cost is approximately \$80,325 and total annual burden hours are 3,825 hours.

13. Estimation of Cost Burden

There are no costs to respondents other than that of their time to respond, as estimated in item 12.

14. Cost to the Federal government

The annual cost to the U.S. federal government will be approximately \$400,000 based on the mean earnings of staff members to set up the data sharing agreements as well as to receive, process, and tabulate the data.

15. Reason for Change in Burden

The federal government burden is attributable to the information collection being submitted as new and the staff task assignments.

16. Project Schedule

Once the Census Bureau has received and successfully processed the state data, table packages and data visualizations will be produced within six (6) months.

17. Request to not display expiration date

The Census Bureau is seeking approval to not display the expiration date for OMB approval of the information collection. The information does not use collection forms to acquire these state administrative records data. Instead, the Census Bureau negotiates the terms of acquisition with each responsible state agency in the form of a voluntary data sharing agreement. Therefore, the acquisition of these records does not lend itself to the display of the OMB approval information.

18. Exceptions to the certification

No exceptions.