

SUPPORTING STATEMENT A
U.S. Department of Commerce
U.S. Census Bureau
Generic Clearance for the Collection of State Administrative Records Data
OMB Control No. 0607-0995

Abstract

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 to improve efficiency and accuracy of Census data collections, including 2030 Census Operations, and improve measures of the population and economy. The Census Bureau encourages the District of Columbia and all 50 states, to share administrative records data generally associated with, but not limited to, government assistance programs. 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 copies of reports and tabulations that Census creates for Census research purposes to enhance information about participation in assistance programs.

Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

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 to improve efficiency and accuracy of Census data collections, including 2030 Census Operations, and improve measures of the population and economy.

In 2030, state administrative records could potentially be used to enhance non-ID address processing, imputation, in-office enumeration, contact strategies, and post-processing.

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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 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 TANF data to the Census Bureau under 42 U.S.C. § 1320b-7 and 45 C.F.R. § 205.50

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

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 (CPS), and the American Community Survey (ACS).

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. Active Participant definitions,
- c. Complete monthly case unit address history (residence, mailing),
- d. Benefit month,
- e. Monthly Benefits data (any of the available: benefits received date, benefits amount issued/received, and benefit amount redeemed),
- f. Income reporting requirement (simplified reporting, change reporting, etc.),
- g. Gross income (monthly),
- h. Net income (monthly),
- i. Eligibility and denial information,
- j. Household size,
- k. Identifiers for individuals in case units, and
- l. The following information on individuals in a case unit:
 - i. Name
 - ii. Social Security Number
 - iii. Case unit/main contact phone number
 - iv. Unique individual identifier
 - v. Benefit month

- vi. Case unit identifier
- vii. Program data type
- viii. Active participant definitions
- ix. Relationship to primary recipient
- x. History of membership in case unit
- xi. Race
- xii. Hispanic origin/Ethnicity
- xiii. Sex
- xiv. Date of birth
- xv. Gross income (monthly)
- xvi. Net income (monthly)
- xvii. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)
- xviii. Education
- xix. Employment

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 may provide tabulated data to the participating state agencies that may use these tabulations for research related to and evaluation of state programs, such as rates of enrollment in and demographic characteristics of participants in state assistance programs.

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. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.**

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. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Question 2.**

The Census Bureau is qualified to do this work based on its capacity to assign unique identifiers to files that facilitate linkage across files. As such, the Census Bureau does not believe there is duplication of effort for this particular work either outside the Census Bureau or from other areas within the Census Bureau.

- 5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

Small businesses or other small entities do not provide information.

- 6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

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

- 7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- requiring respondents to report information to the agency more often than quarterly;
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;

- in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

No special circumstances.

- 8. If applicable, provide a copy and identify the date and page number of publications in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The Census Bureau has collaborated with the USDA Economic Research Service (ERS) and the USDA Food and Nutrition Service (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 February 16, 2024, Vol. 89, Document Number 2024-03207, Pages 12305-12306, inviting public comment on our plans to submit this request.

Four public comments were received in response to the published notice. Below is the Census Bureau's summarization of the comments received and responses.

We appreciate the interest in the Census Bureau's work related to the administrative records collection.

As part of routine work, the Census Bureau enters into voluntary data-sharing agreements with many state agencies that maintain administrative records on a variety of programs including the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), and Women, Infants, and Children (WIC) program. Under Title 13, all census data acquired from state agencies can only be used for statistical purposes and is strictly protected under Title

13. By law, the Census Bureau does not share any data protected under Title 13 with the states or share personally identifiable information with any government or law enforcement agencies.

As we move forward with the 2030 Census, we continue to research improvement efforts on how we collect and present information on historically undercounted and hard-to-count populations. We are taking a solid approach across the Census Bureau within the 2030 Census research program on the collection and reporting of data on these populations.

See more on 2030 Census research projects that look to explore five focus enhancement areas that will include the undercounted, administrative records enumeration. In addition, see the Census Bureau's position on transparency and reproducibility as an agency. Please visit: <https://www.census.gov/about/policies/quality/guidelines/transparency.html>.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No gifts will be provided to the participating state agencies. The Census Bureau may provide limited reimbursement to state program agencies per data type for the costs incurred by the state to extract the data. As an example of a data type, SNAP data for this purpose would be considered one data type. A separate data type would be WIC, for example.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

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 and not for purposes of enforcement or individual benefit determinations.

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 during initial discussions.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

No sensitive questions will be asked.

12. Provide estimates of the hour burden of the collection of information.

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under 'Annual Cost to Federal Government' (Item #14).**

There are potentially 51 respondents, each of the 50 U.S. states 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 \$99,450 and total annual burden hours are 3,825 hours.

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

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

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

The annual cost to the U.S. federal government will be approximately \$400,000 to cover staff time involved in developing agreements and communicating with states. This is 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. The government will also spend approximately \$500,000 to otherwise acquire the SNAP and WIC data.

15. Explain the reasons for any program changes or adjustments reported in ROCIS.

There are no changes to the information collection since the last OMB. There are no changes to respondent burden.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Once the Census Bureau has received and successfully processed the state data, table packages and data visualizations will be produced within six (6) months from the date the state administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the American Community Survey annual response data become available, whichever is later.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

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. Explain each exception to the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

"The agency certifies compliance with [5 CFR 1320.9](#) and the related provisions of [5 CFR](#)

1320.8(b)(3)