

Re: Draft ICR request -- Generic Clearance for Collection of State Administrative Records Data (OMB #0607-0995)

Andrew Reamer <areamer@gwu.edu>

Mon 2/26/2024 10:21 AM

To:ADRM PRA (CENSUS/ OTHER) <adrm.pra@census.gov>

Thanks, Jasmine. While Attachment A covers state administrative records for SNAP and TANF, the proposed clearance is open-ended regarding the types of records covered and Census indicates that it obtains other types of state administrative records, as we can see here:

- [Real-Time 2020 Administrative Record Census Simulation](#) (May 2023) -- this mentions SNAP, TANF, WIC, and drivers' licenses (pp. 45-46)
- [Administrative Data Used in the 2020 Census](#) (August 2021) -- also cites Homeless Management Information System and makes clear the programs listed are examples of state and local data sources, suggesting there are others (p. 4)
- [Administrative Records and the 2020 Census](#) (April 2021)
- [Intended Administrative Data Use in the 2020 Census](#) (May 2020) -- this was published in fulfillment of the terms of clearance for the 2019 ICR. Same list (p. 3) as in the August 2021 item.

The Jan 2023 PIA for Census-held administrative records is vague regarding the types of records from state and local governments. [ADRM Center for Optimization and Data Science \(CODS\) Integrated Research Environment \(IRE\)](#) Section 2.2 (p. 5) includes an X for State, Local, Tribal government data sources. Section 2.4 relates the PIA to this ICR. OMB 0607-0995 Generic Clearance for Collection of State Administrative Records Data Specific types of state admin records aren't noted other than an X for driver's license in Section 2.1.

Now that I see that the Census Bureau names five types of state admin records, I'll refine my request for a sources-uses matrix as follows:

- The data sources side of the matrix would include:
 - each of the five sources noted above (SNAP, TANF, WIC, HMIS, DL), plus any other specific sources currently collected, plus any specific sources not now collected but contemplated for collection during the clearance period;
 - for each data source, the number of states that currently have a data-sharing agreement (such as Attachment A) with the Census Bureau.
- The programs side of the matrix would name the specific Census programs that would be making use of the state administrative records.
- For any specific Census program making use of any specific state administrative record source, an X would be placed in the intersecting cell.

Thanks very much for your attention to my request, Jasmine. As before, please consider this email as part of my comment on the FRN for this proposed ICR. I look forward to your response.

Sincerely,

Andrew

On Mon, Feb 26, 2024 at 8:19 AM ADRM PRA (CENSUS/ OTHER) <adrm.pra@census.gov> wrote:
I do believe Attachment A refers to this, attached.

Yes - since this is a draft it's not fully updated yet.

And thanks, I will add that to the comments!

- Jasmine

From: Andrew Reamer <areamer@gwu.edu>

Sent: Thursday, February 22, 2024 10:35 AM

To: ADRM PRA (CENSUS/ OTHER) <adrm.pra@census.gov>

Subject: Re: Draft ICR request -- Generic Clearance for Collection of State Administrative Records Data (OMB #0607-0995)

Thanks very much, Jasmine. This is most helpful and I've posted its availability on EconSpark. The post currently has 56 views.

I do have two additional requests. One, are you able to provide a copy of draft Attachment A? Per the supporting statement Part B, "A draft agreement will be offered for states for use and example tabulations and data visualizations will be shared. An example of this is included in Attachment A."

Two, a request in relation to this paragraph in Part A section 8:

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. Eighteen public comments were received in response to the published notice, all in regards to usage of administrative records to collect citizenship. The Census Bureau produced and published a document outlining our use of administrative records.

The second and third sentences are text, I believe, from the 2019 ICR--the document referenced in the third sentence was produced in May 2020.

My request, which we can consider my initial response to the 60-day FRN:

Under this ICR, would you please include a row-column matrix setting out the specific types of state administrative records intended for collection by the Census Bureau (e.g.,

SNAP, driver's licenses) and the Census Bureau programs for which each type of record would be used (e.g., the ACS) over the requested period of clearance?

Thank you for your consideration and I look forward to your response,

Andrew

Two,

On Thu, Feb 22, 2024 at 8:00 AM ADRM PRA (CENSUS/ OTHER) <adrm.pra@census.gov> wrote:
Good morning Mr. Reamer!

Attached are the drafts of the Supporting Statements A and B. These are not finalized, and modifications may happen prior to the ICR going to OMB for their review/approval.

Please let us know if there are any more questions.

- Jasmine

From: Andrew Reamer <areamer@gwu.edu>

Sent: Saturday, February 17, 2024 01:24 PM

To: ADRM PRA (CENSUS/ OTHER) <adrm.pra@census.gov>

Subject: Draft ICR request -- Generic Clearance for Collection of State Administrative Records Data (OMB #0607-0995)

Dear Ms. Aramony,

On behalf of the American Economic Association (AEA) and the Industry Studies Association (ISA), I request a copy of the draft ICR for the Generic Clearance for Collection of State Administrative Records Data (OMB #0607-0995), as invited by the February 16 [Federal Register](#). In particular, I wish to receive a copy of the draft supporting statement and a row-column matrix setting out the specific types of state administrative records currently collected by the Census Bureau (e.g., SNAP, driver's licenses) and the Census Bureau programs in which each type of record is used (e.g., the ACS).

Thank you. In the meantime, I've posted the following for AEA and ISA members:
<https://www.aeaweb.org/forum/4302/administrative-records-collection-comments-invited-proposal> and will revise on receipt of draft ICR materials.

Sincerely,

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