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RE: February 16, 2024 Federal Register Notice of information collection and request for comments in regard to generic clearance of collection of state administrative records data, Docket Number USBC-2024-0001

The FRN discusses the Census Bureau's intention to continue the collection of administrative records data held by state agencies to improve the efficiency and accuracy of data collections and to enhance measures of the population and economy. This initiative aims to integrate and link Census Bureau data with state administrative records data to improve research and operations. The Census Bureau seeks “administrative records data generally associated with, but not limited to: nutrition and food assistance programs, including the Supplemental Nutrition Assistance Program (SNAP) and the Special Supplemental Nutrition Program for Women, Infants and Children (WIC); and welfare programs, including child care subsidy; household self-sufficiency programs, including low income energy assistance programs and Temporary Assistance for Needy Families (TANF).”

- a) The FRN solicits public comment on “whether the proposed information collection is necessary for the proper functions of the Department, including whether the information will have practical utility.”

This data collection is not only necessary to improving accuracy and efficiency but also to advancing equity—both in terms of reducing demographic gaps in data quality and of generating high-quality data products that help us understand the impact of federal policies on equity outcomes.

However, data sharing agreements between states and the Census Bureau must be made public and accessible. Too often, stakeholders seeking to understand the details of data sharing agreements between states and the Census Bureau are unable to do so because such agreements are frequently withheld from public disclosure or, if accessible, are not systematically gathered in a central location by government agencies. Detailed documentation and transparency regarding the collection process, the specific data elements being collected and their utility will be critical to help the public better understand the necessity of data sharing and how administrative data contributes to the bureau’s functions and objectives.

In addition, it is essential that the Census Bureau safeguard against the misuse of this data. Responsibly collecting and safeguarding data is fundamental to the bureau's proper functioning, ensuring that the data's utility is maximized without compromising privacy. Clear articulation of safeguards should be included in all data sharing agreements.

- b) The FRN solicits public comment on “the accuracy of our estimate of the time and cost burden for this proposed collection, including the validity of the methodology and assumptions used.”

It is not clear whether the time and cost estimates have accounted for the additional effort, expertise, or software required to ensure equity in data collection, such as research on identifying and addressing biases in data sources, linkage methodologies, and governance policies. In addition, the estimated cost burden excludes collection of administrative records data held by U.S. territories. These territories should be included to improve accuracy and efficiency and to advance equity in the generation of high-quality data products.

It is not clear whether the cost estimates account for additional effort, expertise, or software required for robust engagement with stakeholders and public education about the acquisition, management, and use of state administrative data. The cost estimates may not allow for the bureau to improve transparency and public disclosure of operational details related to the acquisition, management, and use of administrative data. It is not clear whether the cost estimates account for additional effort, expertise, or software required for privacy-preserving methods to minimize privacy risks while preserving the utility of information sharing. Stakeholder engagement, transparency, and privacy should all be taken into account when estimating time and cost burden.

- c) The FRN solicits public comment on “ways to enhance the quality, utility, and clarity of the information to be collected.”

The FRN seeks input on improving the linkage of state administrative records with Census data, emphasizing the role of the Protected Identification Key (PIK) for secure and accurate record matching. This effort aims to enhance data accuracy, utility, and accessibility, ensuring the information serves diverse analytical and operational needs effectively.

When and how administrative records are used, as well as which sources of administrative records are used, impact the overall quality of data and gaps in data quality between subpopulations. For example, administrative data sources in the Census Bureau's inventory tend to be more available and more accurate for populations already well-represented in federal surveys. Consequently, these groups—such as households with higher incomes, white populations, and U.S. citizens—are more likely to be accurately linked in the Census Bureau's records. Many uses of administrative records may amplify existing socio-demographic biases in survey data and/or create new biases. The Census Bureau should conduct robust research into methodologies and governance policies that explicitly aim to enhance data quality and equity by improving representation and accuracy for all communities, particularly those historically

underrepresented. These may include, for example, improved data linkage methods for people without Social Security Numbers and Individual Taxpayer Identification Numbers (ITINs). The Census Bureau should incorporate insights from state and local stakeholders to inform use of administrative data, particularly to identify, address, and mitigate any biases.

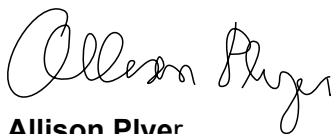
Public trust in a statistical agency (and its products) is an important component of data quality, as recognized by the United Nations' Statistical Division. The bureau should actively involve stakeholder groups in discussions about the acquisition, management, and use of administrative data, such as addressing concern around the collection of certain sensitive data and the potential for privacy disclosures. And the bureau should provide greater transparency around data sharing agreements to enhance public oversight and accountability. For example, the bureau should publish details from data sharing agreements regarding scope, data protection measures, and terms of use.

- d) The FRN solicits public comment on ways to “minimize the reporting burden on those who are to respond, including the use of automated collection techniques or other forms of information technology.”

The Census Bureau will need input from stakeholders, including state groups and community organizations, to identify and implement technology solutions that minimize burden without compromising data quality or security. To maintain transparency, the bureau should actively involve stakeholder groups in discussions about tools and technologies used to reduce the reporting burden—including guidelines on how they work and how individuals' privacy is protected. Automated techniques and technology should incorporate the highest level of privacy-preserving methodologies in the data acquisition and linkage process to ensure that enhancing data quality does not compromise privacy.

Thank you for this opportunity to comment on the Census Bureau's approach to gathering state administrative records data.

Sincerely,



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