



June 21, 2024

Ms. Sheleen Dumas
Departmental Lead PRA Officer
Office of the Chief Information Officer
U.S. Department of Commerce
14th and Constitution Avenue NW
Washington, DC 20230

Dear Ms. Dumas,

We, the undersigned organizations, are writing to provide comments on the proposed information collection request, "Generic Clearance for Collection of State Administrative Records Data." We commend the Census Bureau's efforts to integrate administrative data with survey data to enhance statistical operations and data quality. However, greater transparency, accuracy, and equity in these endeavors are necessary to maintain public trust and collaboration.

Transparency and Trust

The integration of state administrative records with Census Bureau data promises significant advancements in data quality and operational efficiency. However, these benefits can only be realized if the process is transparent and inclusive. Transparency is not merely about public documentation but involves offering actionable insights into methodologies, data origins, and accuracy metrics. By making these details accessible and subject to public scrutiny, the Census Bureau can foster trust and ensure that the data is used ethically and effectively. Public trust is paramount; without it, the very integrity of the census process may be compromised.

Therefore, we urge the Census Bureau to:

- **Adopt a robust framework for transparency** that includes detailed documentation, regular public updates, and opportunities for stakeholder engagement.
- **Publish data sharing agreements** between states and the Census Bureau. These agreements should be made public and accessible in a centralized repository. Detailed public documentation on the collection process, the specific data elements being collected and the agreed upon uses of the shared data is crucial. This transparency will help the public better understand the necessity of data sharing and how administrative data contributes to the bureau's functions and objectives.
- **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, and how those safeguards will be enforced, should be included in all data sharing agreements.

Data Equity and Accuracy

Furthermore, equity must be the cornerstone of the Census Bureau's approach to administrative data. The Bureau's policies and practices should prioritize the benefits to persistently undercounted populations and mitigate any potential biases in data linkage and utilization. This commitment to equity should be reflected in rigorous evaluations of data sources, proactive stakeholder engagement, and stringent safeguards against data misuse. The historical underrepresentation and over-surveillance of marginalized communities necessitate a cautious and deliberate approach.

Therefore, we urge the Census Bureau to:

- **Conduct rigorous evaluations of administrative data sources** for accuracy, potential biases, and quality, including assessments of underreporting and coverage bias.
- **Work closely with community advocates and civil rights organizations** to ensure their perspectives and expertise are incorporated into decisions around data acquisition and utilization.
- **Uphold the highest standards of confidentiality and accuracy**, ensuring that administrative data is used solely for statistical purposes and never to the detriment of the communities it aims to serve.

Conclusion

In conclusion, we support the Census Bureau's efforts to enhance its operations through the use of state administrative records. However, we stress that this must be accompanied by unwavering commitments to transparency, confidentiality, and equity. These principles are not just ethical imperatives but practical necessities for achieving a fair and accurate census. We look forward to continued dialogue and collaboration to ensure these goals are met.

Sincerely,

Allison Plyer

Co-Chair of the CQR Task Force
Chief Demographer, The Data Center

Cara Brumfield

Co-Chair of the CQR Task Force
Director of Income and Work Supports,
The Center for Law and Social Policy

Coalition on Human Needs

Georgetown Center on Poverty and Inequality