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STATE DATA CENTER
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We Bring Value-Added Census Data and Education to the User

January 12, 2018

Jennifer Jessup
Departmental Paperwork Clearance Officer
Department of Commerce, Room 6616
14th and Constitution Avenue NW
Washington, DC 20230

Dear Ms. Jessup—

The Census Bureau has issued a request for comments concerning American Community Survey (ACS) methods panel tests and the use of administrative data as a substitute for survey of data subjects (Docket number USBC-2017-0006).

I am writing on behalf of the National State Data Center (SDC) Steering Committee to offer our comments. The SDC network includes state government statistical agencies, research offices, and data-providing organizations from 56 states and U.S. territories. We partner with the Census Bureau to provide training, technical assistance, and extension of Census products in our states. The Steering Committee represents the interests of these organizations, and coordinates activities with the Census Bureau.

Our members **fully support** Census Bureau's continuous improvement of ACS research design and resulting data products. In our view, the proposed messaging tests and content tests are necessary and practical for the long-term improvement of ACS.

Most of our comments in this letter concern just one aspect of the present Federal Register notice: the re-use of administrative records data as a substitute information resource, or a validation resource, by the ACS Program.

Our SDC network members have deep familiarity with data resources in our respective states. Much of the relevant administrative data that Census Bureau is considering or evaluating is collected and maintained by peer state and local agencies. Some data sources and data elements are highly standardized across the country. Other data sources and data elements are not. Some data sources will be publicly-accessible or discoverable -- and thus obtainable with few or no obstacles. Other data is considered private, confidential and/or protected by state and local statutes.

Our steering committee agrees with the proposition that administrative data can productively substitute for, or provide validation for, data that is currently collected through ACS household surveys and group quarters surveys. We also agree that some administrative data resources will be as reliable as (or possibly more reliable than) data collected through surveys. One example: There is reason to doubt whether all households reliably know the year-built of buildings in which they live. The Bureau may want to prioritize administrative data substitution specifically for topics where the potential for respondent error is highest, and where the substituted administrative records are consistently complete. In this way, the information collected for ACS may be improved, and the burden on participating households may be economized by reducing the length of ACS questionnaires.

In the Federal Register notice, Census Bureau estimates 66,667 hours required to test the use of administrative data. I infer that this is specifically for testing an eventual, revised ACS questionnaire *after* eliminating or modifying some questions. I do suggest, as described below, that the re-use of administrative data introduces some new burdens – specifically for data-steward agencies.

Careful planning and testing is needed before full-scale implementation and change of the ACS research design. From the Federal Register notice, I expect such testing will involve comparing administrative records-derived data with comparable data from households surveys. I assume the comparisons will be accomplished using the main "production" ACS survey data that Census Bureau already collects, on-going. This will economize on respondent time burden.

Administrative records data re-use entails no interaction between Census Bureau and original data subjects – thus zero time burden – but it will take time to identify data steward agencies, request and obtain data from these, and extract, transform, load, and further process the administrative records data. Possibly this is described in a separate Federal Register notice.

I suggest Census Bureau focus inquiry on the workflow necessary to standardize data from a diverse sample of data-providing agencies. In the Federal Register notice, the Bureau identifies initial interest in using administrative records to identify year-built of housing units, condominium status, property values, property taxes, and acreage. Most or all of the five variables could be obtained, in most of the country, from property parcels databases. These databases are often considered publicly-accessible or discoverable data -- which makes property parcels data a good place to begin.

The target number of 100,000 records, mentioned in the Federal Register notice, is not itself important; rather, more important is the variation of data content, completeness and quality across the data-providing agencies. I recommend that a reasonably diverse sample would involve 50 or more data-providing agencies.

Our SDC Steering Committee considers the use of administrative records data as an important new direction for Census Bureau and the ACS Program, and a promising avenue for

economizing on ACS Program costs and reducing respondent burden. At the same time, this new direction could increase the complexity of Census Bureau's back-office data processing, and could increase the burden or responsibility of state and local data steward agencies called on to provide data to Census Bureau. Some of these are external partners or internal peers of our State Data Centers. With that in mind, we may be available to work with Census Bureau in identifying and describing data resources based in our states.

Finally, we encourage Census Bureau to keep State Data Center members informed about the plans and progress of the ACS Program's administrative records data initiative.

Thank you for your attention to our comments. Our steering committee can be reached at todd.graham@metc.state.mn.us, or by US mail: Todd Graham, Metropolitan Council, 390 North Robert Street, St. Paul, MN 55101.

Sincerely,

A handwritten signature in black ink, appearing to read 'Todd Graham', with a stylized, cursive script.

Todd Graham
Chairman, Census SDC Steering Committee

cc: Allen Barnes, Arizona Office of Economic Opportunity
Gregg Bell, University of Alabama
Suzan Reagan, Bureau of Business and Economic Research (New Mexico)
Charles Rynerson, Population Research Center (Oregon)
Pam Schenker, Florida Office of Economic and Demographic Research
Jenn Shultz, Pennsylvania State Data Center
Melissa Stefanini, Tennessee State Data Center
Dan Veroff, Applied Population Lab (Wisconsin)