UNITED STATES DEPARTMENT OF COMMERCE
U.S. Census Bureau
Washington, DC 20233-0001

February 12, 2021

Mr. Austin R. Evers
American Oversight
1030 15th Street, NW, Suite B255
Washington, DC 20005
foia@americanoversight.org

Dear Mr Evers:

This letter is in response to your Freedom of Information Act (FOIA), Title 5, United States Code, Section 552, request dated July 9, 2019, to the U.S. Census Bureau's FOIA Office. We received your request in this office on July 9, 2019. We have assigned to it tracking number DOC-CEN-2019-001731 and are responding under the FOIA to your request for:

> All e-mail communications (including email messages, email attachments, and calendar invitations) between (1) the Census Bureau officials and employees specified below and (2) Thomas "Tom" Hofeller (including *but not limited to* the email addresses celticheal@aol.com and thofeller@rnchq.org) or A. Mark Neuman.
>
> i. Director Steven Dillingham
> ii. Deputy Director Ron Jarmin
> iii. Former Deputy Director Enrique Lamas
> iv. Chief of Staff Christa Jones
> v. Senior Advisor, Kevin Quinley
>
> In light of recent press reporting that Christa Jones communicated with Thomas Hofeller using both official government email as well as a personal email account (xtadjones@hotmail.com), American Oversight requests that the Census Bureau search both Jones' official and personal e-mail accounts—and any others that Jones may have used—for responsive records.

AMERICAN OVERSIGHT

Records regarding citizenship are publicly available in the FOIA Library at

https://www2.census.gov/foia/records/citizenship-communications.pdf
https://www2.census.gov/foia/records/federal-mou-agreements.pdf
https://www2.census.gov/foia/records/state-mou-agreements.pdf

Please let us know if this fulfills your request and indicate your continued interest, in writing, in pursuing any potentially responsive records within 30 business days from the date of this letter or we will assume you are no longer interested in this FOIA request and the case will be administratively closed.

Please contact Sarabeth Rodriguez or Deloris Reed by telephone at 301-763-2127 or by e-mail at census.efoia@census.gov if you have any questions regarding your request.

Sincerely,

Deloris Reed
signed for

Vernon E. Curry, PMP, CIPP/G
Freedom of Information Act/Privacy Act Officer
Chief, Freedom of Information Act Office

AMERICAN OVERSIGHT

From: Kimberly L Leonard (CENSUS/PPSI FED)
To: (b) (6) ; (b) (6)
Cc: Enid Santanaortiz(CENSUS/ADDC FED); Antonio Ellis (CENSUS/FLD FED)
Subject: 2019 Census Test Preliminary Results (rescheduled)
Date: Wednesday, October 30, 2019 12:20:10 PM

Dear Advisory Committee Members,

The 2019 Census Test Preliminary Results webinar has been rescheduled for **Monday, November 4 at 3:00 pm.** As a reminder, the Census Bureau conducted a nationally representative self-response test to measure the operational effect of including a citizenship question on self-response rates. The 2019 Census Test Preliminary Results webinar will provide a short overview of the 2019 Census Test as well as preliminary results from the test.

Below are the login details:

WebEx (b) (5) (b) (5)
(b) (5)
Audio: To hear the webinar, you must call by TELEPHONE to (b) (5)

Attendees must call by *telephone* in order to hear the webinar.

Kim Leonard
External Stakeholder Program Manager
Office of Program, Performance and Stakeholder Integration (PPSI)
301-763-7281 (office)
(b) (6) *(mobile)*

AMERICAN OVERSIGHT

From: Kimberly L Leonard (CENSUS/PPSI FED)
To: (b) (6) ; (b) (6)
Cc: Enid Santanaortiz(CENSUS/ADDC FED); Antonio Ellis (CENSUS/FLD FED)
Subject: 2019 Census Test Preliminary Results webinar will be rescheduled
Date: Monday, October 28, 2019 12:21:22 PM

Dear Advisory Committee Members,

I regret to inform you that the webinar on the "2019 Census Test Preliminary Results" will be rescheduled to a later date. We will inform you as soon as the new date is confirmed. I apologize for any inconveniences this may have caused.

Have a great day.

Kim Leonard
External Stakeholder Program Manager
Office of Program, Performance and Stakeholder Integration (PPSI)
301-763-7281 (office)
(b) (6) *(mobile)*

From: Kimberly L Leonard (CENSUS/PPSI FED) <kimberly.l.leonard@census.gov>
Sent: Monday, October 21, 2019 9:48 AM
To: DIR ACB NAC Members List <dir.acb.nac.members.list@census.gov>; DIR ACB CSAC Members List <dir.acb.csac.members.list@census.gov>
Cc: Enid Santanaortiz(CENSUS/ADDC FED) <Enid.Santanaortiz@census.gov>
Subject: 2019 Census Test Preliminary Results

Dear Advisory Committee Members,

You are invited to participate in a webinar on 2019 Census Test Preliminary Results. The Census Bureau conducted a nationally representative self-response test to measure the operational effect of including a citizenship question on self-response rates. The 2019 Census Test Preliminary Results webinar will provide a short overview of the 2019 Census Test as well as preliminary results from the test.

Please note that the preliminary results from the test are being shared with the Committee prior to the public release scheduled for October 31. We appreciate your discretion until then.

- **Date of webinar**: October 30, 2019

AMERICAN OVERSIGHT

- **Time start and (expected) end:** 2:00 pm - 3:00 pm (Eastern)

Below are the WebEx login details, and the Verizon audio conference call in details.

WebEx: (b) (5) [redacted]

Audio: (b) (5) [redacted] (Attendees must call in by telephone to hear the audio)

Kim Leonard
External Stakeholder Program Manager
Office of Program, Performance and Stakeholder Integration (PPSI)
301-763-7281 (office)
(b) (6) [redacted] *(mobile)*

AMERICAN OVERSIGHT

From: John Maron Abowd (CENSUS/ADRM FED)
To: (b) (6) ; Lisa B Stewart (CENSUS/ADRM FED); (b) (6)
Cc: John L Eltinge (CENSUS/ADRM FED)
Subject: Action Items from OpCom
Date: Tuesday, June 05, 2018 4:52:25 PM

(b) (5)

. Here are the action items from today's OpCom.

1. The administrative record of the Secretary of Commerce's decision to instruct the Census Bureau to put a question on citizenship onto the 2020 Census has been FOIAed. *Tomorrow, June 6th, the administrative record will be released to the Hill and as a FOIA response on www.census.gov.* This record contains hundreds of emails and internal memos. Everyone in your Centers should be explicitly reminded that all inquries about the citizenship question and this administrative record should be directed to the Office of Public Affairs in the Department of Commerce https://www.commerce.gov/doc/os/office-public-affairs. You may also direct inquiries to our own PIO.
2. The IRS Safeguard Review will run from Tuesday, July 17th through Thursday, July 19th. Even though R&M is an old-hand at Safeguard Reviews, please ensure that any staff invited to pre-Safeguard meetings or Safeguard events accepts those invitations and attends those meetings. Please ask your staffs to look around and make sure that all work and open spaces have been sanitized appropriately.
3. In case you missed the announcement, Karen Dunn Kelley has been nominated as Deputy Secretary of Commerce. Confirmation hearings have not yet been scheduled.

Thanks,

John M. Abowd, PhD
Associate Director and Chief Scientist
Research and Methodology
U.S. Census Bureau

Office 301.763.5880 (simulring on cell) Room (b) (6)
john.maron.abowd@census.gov

census.gov
Connect with us on Social Media

AMERICAN OVERSIGHT

From: Yang Cheng (CENSUS/DSMD FED)
To: Joseph Engmark (CENSUS/CSRM FED)
Cc: Tommy Wright (CENSUS/CSRM FED)
Subject: Fw: Dr. Dongchu Sun"s disclosure avoidance talk
Date: Thursday, October 18, 2018 9:54:06 AM
Attachments: (b) (5) [redacted] x

Good morning Joe,

I need ask you for a favor. I think you know the procedure to send out summer at Census seminar. Can you help me to send out this seminar announcement (add WebEx information)? Let me know if you have any question. Thanks in advance!

Yang

Yang Cheng, Ph.D.
Lead Scientist, CPS, DSMD, US Census Bureau
Office: 301-763-3287 Room (b) (6) [redacted] yang.cheng@census.gov
census.gov Connect with us on Social Media

From: John Maron Abowd (CENSUS/ADRM FED)
Sent: Wednesday, October 17, 2018 11:09 PM
To: Yang Cheng (CENSUS/DSMD FED)
Cc: Robert Sienkiewicz (CENSUS/CDAR FED); Anthony G Tersine Jr(CENSUS/DSMD FED)
Subject: Re: Dr. Dongchu Sun's disclosure avoidance talk

Approved.

John M. Abowd, PhD, Associate Director and Chief Scientist
U .S . Census Bureau
Research and Methodology
O: (b) (6) [redacted] (simulring on cell)
census.gov | @uscensusbureau

On Oct 16, 2018, at 5:11 PM, Yang Cheng (CENSUS/DSMD FED) <Yang.Cheng@census.gov> wrote:

AMERICAN OVERSIGHT

Dear John & Rob,

I drafted an announcement for joint seminar. Please provide comments/suggestions before I send out. Thanks!

Yang

Yang Cheng, Ph.D.
Lead Scientist, CPS, DSMD, US Census Bureau
Office: 301-763-3287 Room (b) (6) yang.cheng@census.gov
census.gov Connect with us on Social Media

From: John Maron Abowd (CENSUS/ADRM FED)
Sent: Saturday, October 13, 2018 6:22 PM
To: Yang Cheng (CENSUS/DSMD FED)
Cc: Robert Sienkiewicz (CENSUS/CDAR FED)
Subject: Re: Dr. Dongchu Sun's disclosure avoidance talk

Yang, please do arrange a seminar. Ask Rob Sienkiewicz to jointly sponsor it in the new Center for Enterprise Dissemination. I can't promise that I will be there. My role in the ongoing litigation surrounding the citizenship question (I am the sole testifying internal expert for the Census Bureau) has made it difficult to make firm calendar commitments.

Thanks,

John M. Abowd, PhD, Associate Director and Chief Scientist
Research and Methodology
U .S . Census Bureau
O: 301-763-5880 (simulring on cell)
census.gov | @uscensusbureau

From: Yang Cheng (CENSUS/DSMD FED)
Sent: Tuesday, October 9, 2018 5:18 PM
To: John Maron Abowd (CENSUS/ADRM FED)
Subject: Dr. Dongchu Sun's disclosure avoidance talk

AMERICAN OVERSIGHT

Dear John,

I am sending you slides, which Professor Dongchu Sun gave at Data Fusion working group in SAMSI/Duke University on October 2, 2018. Professor Sun visited the Census last week because he was invited a talk at University of Maryland Medical School last Thursday (10/4) and a WSS seminar at BLS last Friday (10/5). For attached slides, he uses a new spatial model for misaligning regions from different aggregation to avoid confidentiality.

Professor Dongchu (b) (6) University of Missouri at Columbia. He is visiting SAMSI/Duke University from August 2018 to May 2019 and lead the Data Fusion Working group of Model Uncertainty: Mathematical and Statistical (MUMS), see the website: https://www.samsi.info/programs-and-activities/year-long-research-programs/model-uncertainty-mathematical-statistical-mums/. There are 40 participates for the working groups consist of 17 SAMSI faculty fellows (faculty from other university spent their sabbatical/research leave at SAMSI), 4 SAMSI postdocs, and 20 doctoral students (mostly coming with their advisors at SAMSI).

Prof. Sun plans to visit DC area again at beginning of November. If you are available, I can arrange a talk at the Census on Tuesday 11/6. In addition, he likes to have you talk with his working group in SAMSI regarding Census disclosure avoidance modernization and other research issues. Thanks very much!

Best regards!

Yang

Yang Cheng, Ph.D.
Lead Scientist, CPS, DSMD, US Census Bureau
Office: 301-763-3287 Room (b) (6) yang.cheng@census.gov
census.gov Connect with us on Social Media

(b) (5)

AMERICAN OVERSIGHT

new Center for Enterprise Dissemination. I can't promise that I will be there. My role in the ongoing litigation surrounding the citizenship question (I am the sole testifying internal expert for the Census Bureau) has made it difficult to make firm calendar commitments.

Thanks,

John M. Abowd, PhD, Associate Director and Chief Scientist
Research and Methodology
U .S . Census Bureau
O: 301-763-5880 (simulring on cell)
census.gov | @uscensusbureau

From: Yang Cheng (CENSUS/DSMD FED)
Sent: Tuesday, October 9, 2018 5:18 PM
To: John Maron Abowd (CENSUS/ADRM FED)
Subject: Dr. Dongchu Sun's disclosure avoidance talk

Dear John,

I am sending you slides, which Professor Dongchu Sun gave at Data Fusion working group in SAMSI/Duke University on October 2, 2018. Professor Sun visited the Census last week because he was invited a talk at University of Maryland Medical School last Thursday (10/4) and a WSS seminar at BLS last Friday (10/5). For attached slides, he uses a new spatial model for misaligning regions from different aggregation to avoid confidentiality.

Professor Dongchu (b) (6) University of Missouri at Columbia. He is visiting SAMSI/Duke University from August 2018 to May 2019 and lead the Data Fusion Working group of Model Uncertainty: Mathematical and Statistical (MUMS), see the website: https://www.samsi.info/programs-and-activities/year-long-research-programs/model-uncertainty-mathematical-statistical-mums/. There are 40 participates for the working groups consist of 17 SAMSI faculty fellows (faculty from other university spent their sabbatical/research leave at SAMSI), 4 SAMSI postdocs, and 20 doctoral students (mostly coming with their advisors at SAMSI).

Prof. Sun plans to visit DC area again at beginning of November. If you are available, I can arrange a talk at the Census on Tuesday 11/6. In addition, he likes

AMERICAN OVERSIGHT

to have you talk with his working group in SAMSI regarding Census disclosure avoidance modernization and other research issues. Thanks very much!

Best regards!

Yang

Yang Cheng, Ph.D.
Lead Scientist, CPS, DSMD, US Census Bureau
Office: 301-763-3287 Room (b) (6) yang.cheng@census.gov
census.gov Connect with us on Social Media

(b) (5)

AMERICAN OVERSIGHT

Please forward to interested managers and let me know if there are any questions. Note that there are 68 applicants in the database today, but the number will increase closer to the JSM conference in August. Also, the US Citizenship question is no longer on this database as well.
Thanks!
Jonah

Jonah L. Wong
Mathematical Statistician
Methodology and Standards Council
U.S. Census Bureau

Office 301.763.3366
Room (b) (6)
jonah.l.wong@census.gov

census.gov | @uscensusbureau
Shape your future. **START HERE** > 2020census.gov

From: Farris, Amy <AMY@(b) (6)
Sent: Wednesday, May 27, 2020 5:55 PM
To: Career Service <careerservice@amstat.org>
Subject: JSM 2020 Virtual Career Service - Registration is Open

Hello JSM Employers,

I am happy to announce that we will be hosting a virtual JSM Career Service this year. Registration is open! If you pre-registered for JSM Career Service, you should have already heard from me, and if you elected to convert your registration you should have received your confirmation and credentials today. If you did not, please let me know.

If you haven't registered, but want to know more please visit the VIRTUAL Career Service page. This summer's JSM Career Service will offer our online, searchable database of candidates' profiles and resumes, and our online message service. **In addition, all General Employer registrations will include a video chat feature to schedule and conduct virtual interviews**. Vendor support is included as needed. The chat feature will utilize webex. It is not required that you use this feature, if you have an organizational alternative that works well for you. There is also an optional add-on available that would allow you to embed a video about your organization to your employer profile page.

Register as an employer.

The JSM EXPO will be going virtual this summer as well. Visit the VIRTUAL EXPO page to learn more about EXPO options.

If you have any questions or need additional information, please let me know.

AMERICAN OVERSIGHT

Thank you,
Amy

Amy Farris
Director of Membership Development and Marketing

American Statistical Association
Promoting the Practice and Profession of Statistics®
732 North Washington Street
Alexandria, VA 22314-1943
(703) 684-1221, (b) (6)
www.amstat.org

AMERICAN OVERSIGHT

From: Tommy Wright (CENSUS/CSRM FED)
To: Marsha Wright
Subject: Fw: JSM 2020 Virtual Career Service - Registration is Open
Date: Sunday, July 05, 2020 9:43:46 PM

From: Jonah L Wong (CENSUS/ADRM FED) <Jonah.L.Wong@census.gov>
Sent: Thursday, June 18, 2020 3:13 PM
To: John Maron Abowd (CENSUS/ADRM FED) <john.maron.abowd@census.gov>; John L Eltinge (CENSUS/ADRM FED) <john.l.eltinge@census.gov>; Tommy Wright (CENSUS/CSRM FED) <Tommy.Wright@census.gov>; Patrick J Cantwell (CENSUS/DSSD FED) <Patrick.J.Cantwell@census.gov>; Anthony G Tersine Jr(CENSUS/DSMD FED) <Anthony.G.Tersine.Jr@census.gov>; Carol V Caldwell (CENSUS/ESMD FED) <Carol.V.Caldwell@census.gov>
Cc: Jerry J Maples (CENSUS/CSRM FED) <Jerry.J.Maples@census.gov>; Michael Bentley (CENSUS/DSSD FED) <Michael.Bentley@census.gov>; Jimmie Scott (CENSUS/DSMD FED) <Jimmie.B.Scott@census.gov>; Xijian Liu (CENSUS/ESMD FED) <Xijian.Liu@census.gov>; Richard A Denby (CENSUS/ADFO FED) <Richard.A.Denby@census.gov>; Steven S Klement (CENSUS/ADRM FED) <Steven.S.Klement@census.gov>; James Farber (CENSUS/DSMD FED) <James.Farber@census.gov>; Amy M Newman Smith (CENSUS/ESMD FED) <Amy.M.Newman.Smith@census.gov>; Mattie Jones (CENSUS/ADRM FED) <mattie.jones@census.gov>; William C Davie Jr (CENSUS/ESMD FED) <William.C.Davie.Jr@census.gov>; Julie B Vesely (CENSUS/ESMD FED) <Julie.B.Vesely@census.gov>; Tim Trudell (CENSUS/DSMD FED) <tim.trudell@census.gov>; Colt S Viehdorfer (CENSUS/ESMD FED) <Colt.S.Viehdorfer@census.gov>
Subject: Fw: JSM 2020 Virtual Career Service - Registration is Open

Hi all,
Our JSM Virtual Career Service is ready to use. Log In to your employer profile

(b) (6)
[redacted]

The participant database is a great resource to find great candidates for recruitment efforts at all levels. For career ladder math stat candidates, remember to reserve the name in CRS.

I have posted the following 5 positions, that we generally recruit at this conference:

1. Mathematical Statistician - Entry level
2. Mathematical Statistician - Mid level
3. Survey Statistician
4. Statistician - Analyst Social Science Demography
5. Social and Behavioral Survey Methodologist

AMERICAN OVERSIGHT

Please forward to interested managers and let me know if there are any questions. Note that there are 68 applicants in the database today, but the number will increase closer to the JSM conference in August. Also, the US Citizenship question is no longer on this database as well.
Thanks!
Jonah

Jonah L. Wong
Mathematical Statistician
Methodology and Standards Council
U.S. Census Bureau

Office 301.763.3366
Room (b) (6)
jonah.l.wong@census.gov

census.gov | @uscensusbureau
Shape your future. **START HERE** > 2020census.gov

From: Farris, Amy <AMY@(b) (6)
Sent: Wednesday, May 27, 2020 5:55 PM
To: Career Service <careerservice@amstat.org>
Subject: JSM 2020 Virtual Career Service - Registration is Open

Hello JSM Employers,

I am happy to announce that we will be hosting a virtual JSM Career Service this year. Registration is open! If you pre-registered for JSM Career Service, you should have already heard from me, and if you elected to convert your registration you should have received your confirmation and credentials today. If you did not, please let me know.

If you haven't registered, but want to know more please visit the VIRTUAL Career Service page. This summer's JSM Career Service will offer our online, searchable database of candidates' profiles and resumes, and our online message service. **In addition, all General Employer registrations will include a video chat feature to schedule and conduct virtual interviews**. Vendor support is included as needed. The chat feature will utilize webex. It is not required that you use this feature, if you have an organizational alternative that works well for you. There is also an optional add-on available that would allow you to embed a video about your organization to your employer profile page.

Register as an employer.

The JSM EXPO will be going virtual this summer as well. Visit the VIRTUAL EXPO page to learn more about EXPO options.

If you have any questions or need additional information, please let me know.

AMERICAN OVERSIGHT

Thank you,
Amy

Amy Farris
Director of Membership Development and Marketing

American Statistical Association
Promoting the Practice and Profession of Statistics®
732 North Washington Street
Alexandria, VA 22314-1943
(703) 684-1221, (b) (6)
www.amstat.org

AMERICAN OVERSIGHT

From: John Maron Abowd (CENSUS/ADRM FED)
To: (b) (6) (b) (6)
Subject: Fw: Requesting ADRM topics for CSAC Fall Meeting (Needed by July 3)
Date: Tuesday, June 26, 2018 3:37:05 PM

Any suggestions beyond the requested sessions below?

Thanks,

John M. Abowd, PhD, Associate Director and Chief Scientist
Research and Methodology
U .S . Census Bureau
O: 301-763-5880 (simulring on cell)
census.gov | @uscensusbureau

From: Tara Dunlop Jackson (CENSUS/CLMSO FED)
Sent: Tuesday, June 26, 2018 2:08 PM
To: John Maron Abowd (CENSUS/ADRM FED); John L Eltinge (CENSUS/ADRM FED)
Cc: Enid Santanaortiz(CENSUS/ADDC FED); Misty L Reed (CENSUS/CLMSO FED); Census Scientific Advisory Committee (CENSUS)
Subject: Requesting ADRM topics for CSAC Fall Meeting (Needed by July 3)

Good afternoon John,

(b) (5)

AMERICAN OVERSIGHT

- (b) (5) [redacted]

(b) (5) [redacted]

We hope to provide you with a final agenda by mid-July. For your reference, the CSAC Spring 2018 meeting agenda is linked here. In the meantime, please reach out if you have any questions. Thanks for your support.

Best,

Tara Dunlop Jackson, MPA
Chief, Advisory Committee Branch
Customer Liaison and Marketing Services Office
U.S. Census Bureau
301.763.5222 (office)
tara.dunlop.jackson@census.gov

Connect with us on census.gov and Social Media

AMERICAN OVERSIGHT

Following up with you. Attached and below are the 2020 CPEX projects that need assistance with power calculations and sample designs. Please let me know who from your area is available to assist. Thanks so much!

Misty

From: Renee Ellis (CENSUS/CSM FED)
Sent: Thursday, July 26, 2018 5:21 PM
To: Misty L Heggeness (CENSUS/ADRM FED)
Cc: Joanne Pascale (CENSUS/CSM FED)
Subject: Re: Summary statements

I did not hear back from everyone but here are the summaries I did for decennial for all projects except the experiment. Attached is the experiment write up. I will catch back up with you when I get back from JSM.

Subgroup 1

(b) (5)

Project 1A

Observations with follow up interviews

(b) (5)

AMERICAN OVERSIGHT

Project 1B

Interviews with community partners

1. (b) (5) [redacted]

Project 1C

Race/Ethnicity follow up interviews

(b) (5) [redacted]

Project 1D

Language and mode re-interviews

(b) (5) [redacted]

AMERICAN OVERSIGHT

Project 1E
Training experiment- see attached

Renee Ellis, PhD
Center for Survey Measurement
U.S. Census Bureau
301-763-5122

AMERICAN OVERSIGHT

From: Tommy Wright (CENSUS/CSRM FED)
To: Misty L Heggeness (CENSUS/ADRM FED)
Cc: Tommy Wright (CENSUS/CSRM FED)
Subject: Fw: Summary statements (CSM 2020 REX
Date: Thursday, August 02, 2018 9:01:39 AM
Attachments: (b) (5) [redacted]

Thanks, misty.

Is Renee Ellis (CSM) the main contact?

Also, is there someone from DSSD working on this as well?

Sincerely,

Tommy

From: Misty L Heggeness (CENSUS/ADRM FED)
Sent: Wednesday, August 1, 2018 9:35 AM
To: Tommy Wright (CENSUS/CSRM FED)
Subject: Fw: Summary statements

Hi Tommy,

Following up with you. Attached and below are the 2020 CPEX projects that need assistance with power calculations and sample designs. Please let me know who from your area is available to assist. Thanks so much!

Misty

From: Renee Ellis (CENSUS/CSM FED)
Sent: Thursday, July 26, 2018 5:21 PM
To: Misty L Heggeness (CENSUS/ADRM FED)
Cc: Joanne Pascale (CENSUS/CSM FED)
Subject: Re: Summary statements

I did not hear back from everyone but here are the summaries I did for decennial for all projects except the experiment. Attached is the experiment write up. I will catch back up with you when I get back from JSM.

Subgroup 1

(b) (5) [redacted]

AMERICAN OVERSIGHT

(b) (5)

Project 1A

Observations with follow up interviews

(b) (5)

Project 1B

Interviews with community partners

1. (b) (5)

Project 1C

Race/Ethnicity follow up interviews

(b) (5)

AMERICAN OVERSIGHT

(b) (5)

[redacted]

Project 1D

Language and mode re-interviews

(b) (5)

[redacted]

Project 1E

Training experiment- see attached

Renee Ellis, PhD
Center for Survey Measurement
U.S. Census Bureau
301-763-5122

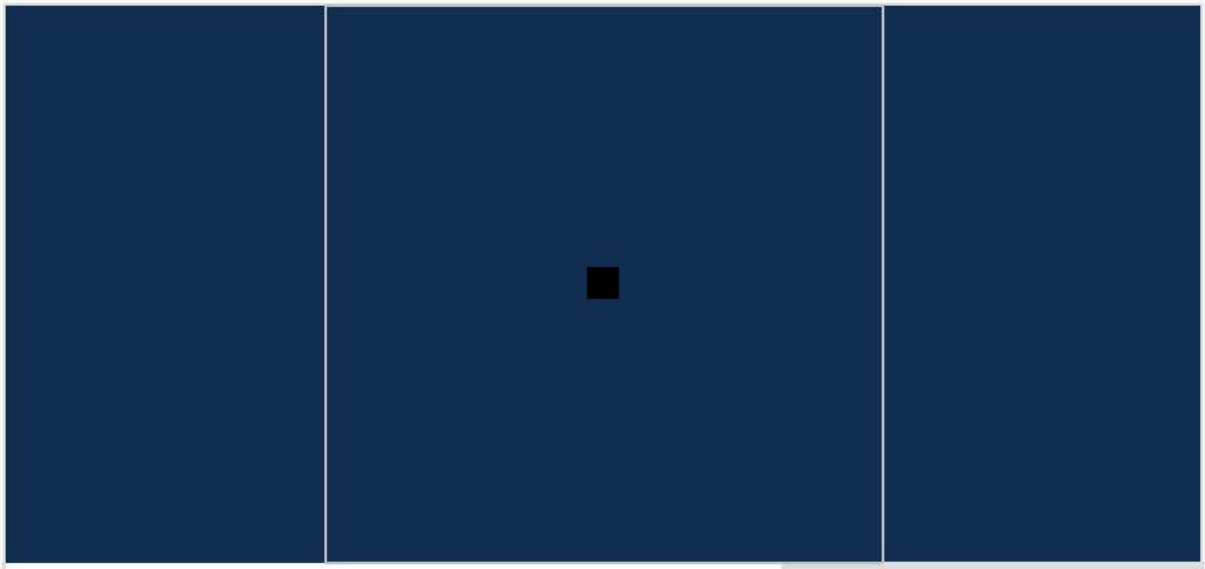
AMERICAN OVERSIGHT

From: Tommy Wright (CENSUS/CSRM FED)
To: Michael C Cook (CENSUS/PIO FED)
Subject: Fw: U.S. Census Bureau Daily News - Monday, August 3, 2020
Date: Monday, August 03, 2020 10:50:18 AM

Hang in there, Michael.

-Tommy

From: U.S. Census Bureau <census@subscriptions.census.gov>
Sent: Monday, August 3, 2020 10:30 AM
To: Tommy Wright (CENSUS/CSRM FED) <Tommy.Wright@census.gov>
Subject: U.S. Census Bureau Daily News - Monday, August 3, 2020



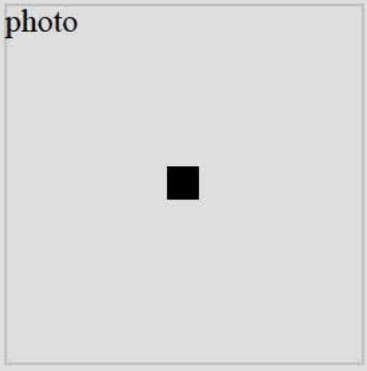
Census Daily News Digest

August 3, 2020

Full Daily Digest

Click Here

photo



2020 Census Spotlight

The Chicago Tribune Editorial Board encouraged readers to respond to the 2020

2020 Census in the News

Summary

Spectrum News in New York reported that the Census Bureau's "push week" has been responsible for an increase in the response rate

AMERICAN OVERSIGHT

in the city. The Associated Press, The Washington Post, The Hill, Newser, Staten Island Advance, and MassLive reported on potential changes to the operational timeline for the 2020 Census, focusing on the nonresponse follow-up operation and the deadline for the delivery of apportionment counts to the President and Congress. The Chicago Sun-Times Editorial Board published a piece on the same topic. The Washington Post article quoted Michael Cook who said the Census Bureau is still evaluating operations and will make an announcement when plans are final.

National & Top-Tier News

View today's national broadcast report.

Trump's push to spoil the census — and make Democrats disappear

The Washington Post – Editorial Board, August 2

President Trump cannot make the coronavirus disappear by curtailing testing, despite his bizarre suggestions otherwise. But he can make Democrats disappear, politically speaking, by spoiling the decennial census — the all-important and heretofore nonpartisan tally of the U.S. population that determines which states get how much political representation and where billions in federal money flow. The Supreme Court blocked his first effort to skew the count.

With time extension stalled, Census speeds up count schedule

Census, writing that a visit from census workers might occur during a "cliffhanger moment during your favorite Netflix series" for those that don't respond.

Census Bureau Spokespeople in the News

Cleveland's ABC affiliate (WEWS-TV) interviewed Michael Cook for an article about how response rates in the city are below the national average. North Carolina's The Daily Reflector quoted Marilyn Stephens who encouraged Greenville residents concerned about interacting with census workers to respond online, by phone, and by mail. Baltimore's CBS affiliate (WJZ-TV) reported on a statement released by Gov. Hogan who provided an update on Maryland's response rates and encouraged residents to 'fulfil their

AMERICAN OVERSIGHT

The Associated Press – Mike Schneider, July 31

The U.S. Census Bureau sped up the timetable for crunching 2020 census numbers on Friday after an earlier request for an extension stalled in the Senate and as pressure mounts to turn in data used to determine congressional districts by year's end, when President Donald Trump is still in office.

Census Bureau could halt count a month earlier than planned, officials say

The Washington Post – Fredrick Kunkle and Tara Bahrampour, July 31

Census Bureau officials appear to be moving toward wrapping up the process of counting all inhabitants of the United States a month earlier than planned as a result of direction from the Trump administration and Congress' failure to agree on an extension, current and former bureau officials said.

Native Americans Feel Devastated by the Virus Yet Overlooked in the Data

The New York Times – Kate Conger, Robert Gebeloff and Richard A. Oppel Jr., July 31

Statistical gaps can make it difficult to properly allocate public resources to Native Americans. When that's the case, one leader said, "tribal nations have an effective death sentence." As the coronavirus outbreak in Washington State's Yakima County worsened last month, Tashina Nunez recognized more and more of the patients who arrived in her hospital.

Census Data in the News

civic duty' and respond to the census. Kentucky's Owensboro Messenger reported that the state surpassed its final response rate for the 2010 Census, quoting a media specialist who explained that Owensboro is also "on its way" to surpassing its 2010 total. New York City's Gothamist quoted Jeff Behler who provided an analogy of a school, saying that if 20 percent of the students don't respond, the school will only get "80% of the funding it deserves" and this will affect all students "because they have to deal with less funding."

Beltway & Other Online News

Puerto Rico and the Census: Our Campaign to Address Anti-Black Racism

Teen Vogue – Gloriann Sacha Antonetty & Alexandra-Marie

AMERICAN OVERSIGHT

12 People in a 3-Bedroom House, Then the Virus Entered the Equation New York Times

U.S. economy contracted at fastest quarterly rate on record from April to June as coronavirus walloped workers, businesses Washington Post

As vaccines move into phase 3 trials, diversity must be at top of agenda ABC News Online

Regional 2020 Census News

Atlanta Region

View today's broadcast report for the Atlanta Region.

U.S. Census will soon begin home visits

The Daily Reflector [NC] – Ginger Livingstone, August 2

U.S. Census workers will start home visits Aug. 11 to ensure all Americans are counted in the second census of the 21st Century.

Outside voter signup, Census drive set Saturday in Huntsville

AL.com [AL] – Lee Roop, July 31

More than a dozen organizations active in Huntsville's Black community plan a socially distanced outdoor event Saturday to register voters and complete Census 2020 forms. All are welcome at the event at 4710 University Drive Plaza from 11 a.m. to 3 p.m., organizers say. Volunteers will help residents verify voter registration material and do their Census forms. Masks are required.

Huntsville coalition members hosting event to engage voter and census participation in the

Figueroa Miranda, August 3

In Puerto Rico, our "Island of Enchantment," you rarely see dark-skinned girls onscreen. You don't really see them in ads or in novelas, but on the off chance, you might see one on the local news every once in a while.

Experts cast doubt on Trump census order: 'It's not possible to do it accurately'

The Washington Times – Stephen Dinan, August 2

The man who designed the method Homeland Security uses to estimate the number of illegal immigrants says there's just too much margin for error to use it to carry out President Trump's new executive order to strip illegal immigrants out of the census count used to apportion congressional seats.

Census to end counting

AMERICAN OVERSIGHT

city

WHNT-TV [AL] - Staff, July 31

The Coalition For Justice Through Civic Engagement and coalition members Lift Our Vote and No More Dirty, Inc. are sponsoring an event to help Huntsville community members verify voter registration material and complete forms for the 2020 Census.

Augusta census participation lags

The Augusta Chronicle [GA] – Susan McCord, July 31

Augusta residents continue to trail the national average in responding to the 2020 Census. As of July 29, 56.5% of Augusta-Richmond County households had replied since the surveys went out in March. The national average was 62.8%, and the state average was 58.6%.

Chicago Region

View today's broadcast report for the Chicago Region.

Bella Vista leads state's cities in census response

Arkansas Democrat Gazette [AR] – Doug Thompson, August 3

Bella Vista has the highest response rate to the U.S. Census of any city in Arkansas, the most recent federal figures show. Both Benton and Washington counties have rates above the state and national averages, the figures show. The federal Census Bureau posts a self-response rate based on the number of households in a town, county or state. The rate is the

efforts a month early: report

The Hill – Mary Johnson, July 31

The Census Bureau has decided to cut the amount of time that it will spend knocking on doors across the country by a month, NPR reports. In April, the agency indicated that it would need until Halloween to accurately count all of the people in the country due to delays incurred by coronavirus pandemic.

Trump Admin Moves To Speed Up 2020 Census Count, Raising Alarms About Accuracy

Talking Points Memo – Tierney Sneed, July 31

The Census Bureau is preparing to wind down certain decennial census operations a month earlier than planned, NPR reported Thursday, amid growing signs that the White House is pushing for a rushed count at the risk of undermining the

AMERICAN OVERSIGHT

percentage of those dwellings where someone has responded to the census survey.

Editorial: Preserve your serenity. Fill our your census form.

Chicago Tribune – Editorial Board, August 2

But if you want to keep annoying intruders off your lawn and porch, here's some advice: Fill out your census form ASAP. Otherwise, you can expect a personal visit from someone dispatched by the federal government to find out who's living in your home. And it may come at a cliffhanger moment during your favorite Netflix series. The Census Bureau mailed reminder cards in July, and don't think you can get away with tossing them.

Trump's damaging attack on the census

Minneapolis Star-Tribune [MN] – Editorial Board, August 2

President Donald Trump's attempts to manipulate the census have taken an even more disturbing turn. Thwarted by the courts in an earlier move to add a citizenship question, Trump now is making a last-ditch effort to exclude undocumented immigrants from the count outright.

#BeCounted in the 2020 Census

Wisconsin Gazette [WI] – Staff Writer, August 2

The NAACP wants you to #BeCounted. It's your chance to be a hero! Join activists from across America, and make your voice heard! You'll help make sure your family and community are represented for the next 10 years.

decennial census' accuracy.

Census Cuts Itself Short, Many Fear 'Massive Undercount'

Newser – Jenn Gidman, July 31

About 40% of US homes haven't responded to census questionnaires for this year's mandated count, so the Census Bureau has started sending out door knockers. But those efforts may be cut short, amid an apparent push by the bureau to wrap things up much earlier than expected—a move that congressional Democrats fear is due to pressure from the White House.

AMERICAN OVERSIGHT

Opinion: Kenosha's 'Be Counted 2020 Census Week'

Kenosha News [WI] – Katherine Marks, August 2

The 2020 Census Complete Count Committees for the City of Kenosha and Kenosha County will launch Kenosha's "Be Counted 2020 Census Week" during August 16–22.

Trump memo boosts census fears among undocumented residents

Chicago Sun-Times [IL] – Manny Ramos, July 31

This past week, the census workers spent a day knocking on doors in Chicago and Cook County. Thursday's one-day test sets the stage for when door-knockers return in force, everywhere, starting Aug. 11.

Democracy is under siege by efforts to keep you from being counted in the Census

Chicago Sun-Times [IL] – Editorial Board, July 31

In normal times, the Census Bureau might be entirely capable of counting every person living in the United States, fully and accurately, and presenting the final tally to the president by the last day of the year, as required by law.

Census 2020 extends deadline

Areawide Media [MO] - Renee Janes, July 31

Census 2020 marks the 24th time since 1790 the United States has counted its population and the data collected is used to determine how federal funding is spent, voting district boundaries and Congressional seats for each state. Due to COVID-19, the timeline for the census has been changed including household

AMERICAN OVERSIGHT

visits for those that have not responded will being Aug. 11 and responses may be made by mail, phone or online through Oct. 31.

Denver Region

View today's broadcast report for the Denver Region.

Opinion: Census 2020: Now is not the time to be complacent in filling out data

Abilene Reporter News [TX] – Jay Hardaway, August 2

In my talks, columns, social media posts, random conversations with people, etc., I often cite apathy as our greatest enemy. I think I am being unfair. A better word is complacency.

2020 Census Campaign visits San Antonio's West Side

KSAT-TV [TX] – Alicia Barrera and Steven Chavez, August 1

The 2020 Census campaign, along with the League of United Latin American Citizens, city and county leaders led a caravan of cars through San Antonio's West Side on Saturday morning to increase community participation in the census. City Census Administrator Berta Rodriguez said less than 50% of the population has responded to the census.

EDITORIAL: Who counts: Valley, state big losers under census command

The Brownsville Herald [TX] – Staff Writer, July 31

President Trump last week ordered the director of the U.S. Census Bureau to subtract

AMERICAN OVERSIGHT

undocumented immigrants from the 2020 enumeration. Doing so would significantly affect the Rio Grande Valley, the state of Texas and other areas where immigrants are a large part of the population. It would weaken our voice in Congress.

Los Angeles Region

View today's broadcast report for the Los Angeles Region.

East LA District Has State's Lowest Census Response Rates

Spectrum News 1 [CA] – Catalina Villegas, August 2

Edeny Casey is working with the nonprofit, We Count LA, to help Boyle Heights residents fill out the 2020 census. She's been doing outreach for campaigns for half a decade, so by now she knows, it's a numbers game: "If you get lucky you'll get a house here or there. So that's why the more houses we hit, the more opportunities we have to fill the census," said Casey.

Living On A Razor's Edge During The Pandemic, Community Clinics Are Urging Census Turnout

LAist [CA] – Caitlin Hernandez, July 31

It's hard to miss the pop-up canopy outside the AltaMed clinic in East L.A. It's an outdoor waiting space where patients often line up. With a large banner reminding folks to get counted in the 2020 Census, it doubles as an active place for civic engagement.

San Mateo County's Census Response Rate Leads State

AMERICAN OVERSIGHT

Patch [CA] – Gideon Rubin, July 31

San Mateo County is being counted at a rate like no other in the state. As of Wednesday, San Mateo County led the state with a 73.9 percent self-response rate, the county announced in a news release Friday.

Editorial: California has a lot riding on the Census

Orange County Register [CA] – Editorial Board, July 31

The 2020 Census has challenges, especially in California. In March 2019, Public Policy Institute of California estimated that about three-quarters of California's population belong to one or more groups that the Census has historically undercounted. These include renters, young men, children, African Americans, Latinos and people who live in nonstandard housing.

Monterey County joins lawsuit against President Trump

Salinas Californian [CA] – Angelica Cabral, July 31

Monterey County joined a growing list of governmental bodies suing President Donald Trump for his attempt to leave undocumented immigrants out of congressional apportionment. Although the 2020 Census is meant to include all people, including those who are living in the United States without papers or who are not citizens, Trump said they shouldn't be counted when determining congressional seats.

AMERICAN OVERSIGHT

County Leads State In Census Response

Bay City News Service [CA] – Staff Writer, July 31

As of Wednesday, San Mateo County had the highest census self-response rate in California at 73.9 percent, officials said Friday. The county's response rate exceeds the national rate of 62.8 percent and the California rate of 64 percent, according to the San Mateo County Office of Community Affairs.

New York Region

View today's broadcast report for the New York Region.

'We need our community to step up': Advocates push for New Yorkers to fill out census

WPIX-TV [NY] – Cristian Benavides, August 3

Advocates and elected officials in New York pushed Sunday for residents to fill out the census after the Census Bureau sped up the timetable on its website for crunching 2020 census numbers.

NYC Census Response Rate Continues To Lag As City Grapples With Pandemic Fears And Reduced Door-Knocking

Gothamist [NY] – Megan Zerez, August 2

Despite the potential loss of millions of dollars in federal aid that would result from an undercount in the 2020 U.S. Census, there's been an alarming lack of participation by New Yorkers, for a myriad of reasons. This follows a national trend, though New York's participation average remains far lower.

AMERICAN OVERSIGHT

[Increase in Self-Responses for Syracuse Census Push Week]

Spectrum News [NY] – Staff Writer, August 2

There are more encouraging census numbers for the city of Syracuse, but there is still more to be done. Thanks in part to Census Push Week, the city saw the self-response rate jump to 50.1 percent. That's in line, if not above, most cities across the state.

[Editorial: There's a lot at stake with the census]

The Daily Gazette [NY] – Editorial Board, August 2

Ever play the game, “Hungry Hungry Hippos” when you were a kid? You roll a bunch of marbles around a bowl in the middle, and each kid frantically pounds on the tail of his or her hippo trying to gobble up as many marbles as they can. The one who gets the most marbles wins. That’s how the census game is played.

[Door-to-door census visits in NY state begin Aug. 6]

Daily Freeman [NY] – Patricia Doxsey, August 1

Thousands of people are set to hit the streets in the coming week as the U.S. Census Bureau begins its door-to-door effort to collect data from households that didn't respond to the 2020 Census. "They're going to go to every address that hasn't responded yet," Behler said.

[Federal Workers Pushing To Get Granite Staters To Fill Out Census]

NHPR [NH] – Rick Ganley and Sarah Gibson, July 31

AMERICAN OVERSIGHT

Federal workers and local volunteers are trying to get as many people as possible in New Hampshire to fill out to 2020 U.S. census. Time is running out for the first part of that process, which is focused on getting people to fill out the survey themselves before a census worker shows up at their door in August.

Why New York City's Census Director Says Ending Door Knocking Early Will Be "Disastrous"

WNYC-FM [NY] – Staff Writer, July 31

The Trump Administration has decided to shorten the deadline for the Census count by one month. That means door-knocking efforts are now slated to stop by September 30th.

Governor Cuomo Asks Residents For Census Help As Responses Stagnate

The Evening Sun [NY]— Zachary Meseck, July 31

Governor Andrew Cuomo is asking that New York State residents reach out to 10 people and remind them to fill out their census, as census week comes to an end and areas like Chenango County fall behind in response rates. According to Chenango County Planning Department Director Shane Butler, as of Wednesday, Chenango's response rate has fallen to the 41st ranked county out of the 62 counties in New York State. Butler said Chenango County is at approximately 54 percent for overall response for the census, and that the area could miss out on vital funding if that number doesn't increase.

Census Workers Begin Door-To-Door Count In Massachusetts

WBZ-TV [MA] – Staff Writer, July 31

AMERICAN OVERSIGHT

Massachusetts residents who haven't responded to the 2020 U.S. Census yet may be getting a knock on their door soon. Census workers started their door-to-door visits Thursday across much of the state. The door-knocking has started in Berkshire, Hampshire, Franklin, Hampden, Worcester Norfolk and Middlesex Counties. The on-the-ground effort will come to the rest of Massachusetts in mid-August.

Door-To-Door Census Count Begins In Massachusetts As Trump Moves To Stop In-Person Count Early

WAMC-FM [NY]— Paul Tuthill, July 31

People in Massachusetts who have not yet responded to the 2020 U.S. Census could soon get a knock on their door. A third of Massachusetts households have not responded to the census, so they will get a visit from a census-taker as the final push begins to count all of the state's 6.8 million residents. " This is crunch time," said Secretary of the Commonwealth William Galvin, the state's top census official, who visited Springfield Thursday for the kickoff of the door-to-door headcount and the start of the final 10 weeks of the 2020 U.S. Census.

Report: Door knocking for Census to end one month earlier than expected

SI Live [NY] – Erik Bascome, July 31

The Census Bureau is reducing the amount of time it will spend door knocking, raising concerns of a potential undercount, according to a new report. On Thursday, NPR reported

AMERICAN OVERSIGHT

that door knocking and in-person interviews for the 2020 Census, originally scheduled to run through Oct. 31, will now end a month earlier, on Sept. 30.

Philadelphia Region

View today's broadcast report for the Philadelphia Region.

Harford County above state, U.S. average in census response; door-to-door count begins Aug. 11

The Aegis [MD] – James Whitlow, August 3

The messaging has been all around Harford County — social media blasts, smiling faces on billboards and workers standing at meal distribution sites — all representing the decennial census as one of the most important and simple things Harford County residents can do.

Opinion: Census will show it's time to redraw Carroll County districts

Carroll County Times [MD] – Christopher Tomlinson, August 3

With the 2020 United States Census underway, Carroll County wants to ensure that every resident is counted. Not only does the data obtained by the Census help the federal government allocate $675 billion to local governments, but the information gathered helps the Maryland General Assembly and Carroll's Board of County Commissioners assess whether congressional, state legislative and commissioner district lines need to be redrawn.

AMERICAN OVERSIGHT

Census Week of Action kicks off in Dauphin County

WHTM-TV [PA] – Karla Urland, August 3

Census Week of Action kicks off today in Dauphin County. The 2020 Census deadline is October 31 and Dauphin County leaders say a lot is riding on the completion of those forms.

New data released on 2020 Census response rates

WPMT-TV [PA] – Harri Leigh, August 2

The countdown is on to complete the 2020 Census, but many Pennsylvanians still haven't been counted. Only 65.9 percent of Pennsylvania households have filled out the Census. Though higher than the national average of 62.8 percent, county officials are working to raise that number despite challenges presented by the pandemic.

Opinion: Don't count out Cleveland neighborhoods in this year's census:

Cleveland Plain-Dealer [OH] – Emily Campbell, August 2

Ensuring that Cleveland's neighborhoods get all the resources they deserve requires a complete count in the U.S. Census. But after three months of self-responding, Cleveland is behind. Particularly concerning, response rates mirror all-too-familiar geographic patterns in which communities of color are left out. A complete census count would give us the opportunity to undo some of the racial inequity issues of the past -- but only if everyone is counted.

AMERICAN OVERSIGHT

Cleveland, other major cities fall below national census completion rate; officials urge participation

WEWS-TV [OH] – Jade Jarvis, August 2

New data from the U.S. Census Bureau shows Cleveland's self-response rates for the 2020 census have fallen far behind the national average. The agency said nationwide the self-response rate for the census is 62.1%. Ohio's rate surpasses the national rate at 66.6%.

Baltimore City lagging behind rest of the state & country when it comes to 2020 census

WBBF-TV [MD] – Micarie Kemp, August 2

New data shows Baltimore City is lagging behind the rest of the state and country when it comes to filling out the 2020 census. Filling out the census is beneficial for everyone because it helps bring federal funding to your community. Across Baltimore City, nearly half of residents still have not filled out their census.

Census countdown is on, but a lot of Pennsylvanians haven't been counted

The Patriot-News [PA] – Jordan Wolman, July 31

Even as Pennsylvania's census response rate ticks 3 percentage points above the national rate of 62.8%, many counties across the Keystone State are lagging way behind. As of Thursday, the U.S. Census Bureau reports less than a third of Forest and Sullivan counties' residents have responded while counties like Chester, Franklin and Lancaster are seeing response rates near 70 or 75%. In the Capital region, Dauphin and Cumberland counties are

AMERICAN OVERSIGHT

seeing response rates better than the state's 65.8% average.

Census Takers Begin Visits For Unfinished 2020 Census In Vienna

Patch [VA] – Emily Leayman, July 31

Census takers are following up at Vienna households that have not completed the 2020 U.S. Census starting on Friday. Census takers are visiting homes to ensure all residents are counted in the 2020 Census. Households began receiving invitations in the spring to complete the Census online, by phone or by mail.

Hamilton County Residents Urged To Complete The 2020 Census

The Pulse [TN]— Staff Writer, July 31

Hamilton County residents are being urged to complete the 2020 Census so the area does not miss out on federal funding. The county's self-response rate of 63.3% (as of 7/22) shows that many still need to complete their census.

California sues Trump over omitting undocumented immigrants from census apportionment count

Jurist [PA] – Erin Napoleon, July 31

California has sued US President Donald Trump over his order prohibiting undocumented immigrants from being included in Census apportionment counts. The complaint, filed Tuesday, argues that Trump's order disturbs and undermines the historical precedent of the US counting "all of its residents, including for the purpose of apportioning the U.S. House of

AMERICAN OVERSIGHT

representatives, regardless of residents' citizenship or immigration status.

Governor Hogan On 2020 Census: 'I Urge Every Single Maryland Resident To Fulfill Their Civic Duty And Help Shape Our Future'

WJZ-TV [MD]— Staff Writer, July 31

Governor Larry Hogan provided an update on the state's progress in the 2020 United State Census on Friday. Maryland ranks 13th among the 50 states with a response rate of 66.7%, which is close to four points above the national average of 62.8%. The state ranks fifth in Internet response and Carroll County leads the state in response rate at 78.4% which ranks 25th of the 3,200 United States counties.

Earlier census deadline could cause W.Pa. officials to accelerate counts

TribLive [PA] – Megan Tomasic, July 31

In an unprecedented move, leaders with the Census Bureau are cutting short in-person counting efforts for the 2020 census, efforts that largely impact hard-to-count populations. The decision, reported by NPR, moves the deadline for in-person census surveys from Oct. 31 to Sept. 30, potentially leaving some communities with uncounted residents — often those who are disproportionately poor, young or people of color.

About Census Daily News Digest

Census media monitoring is a daily compendium of articles about the Census

AMERICAN OVERSIGHT

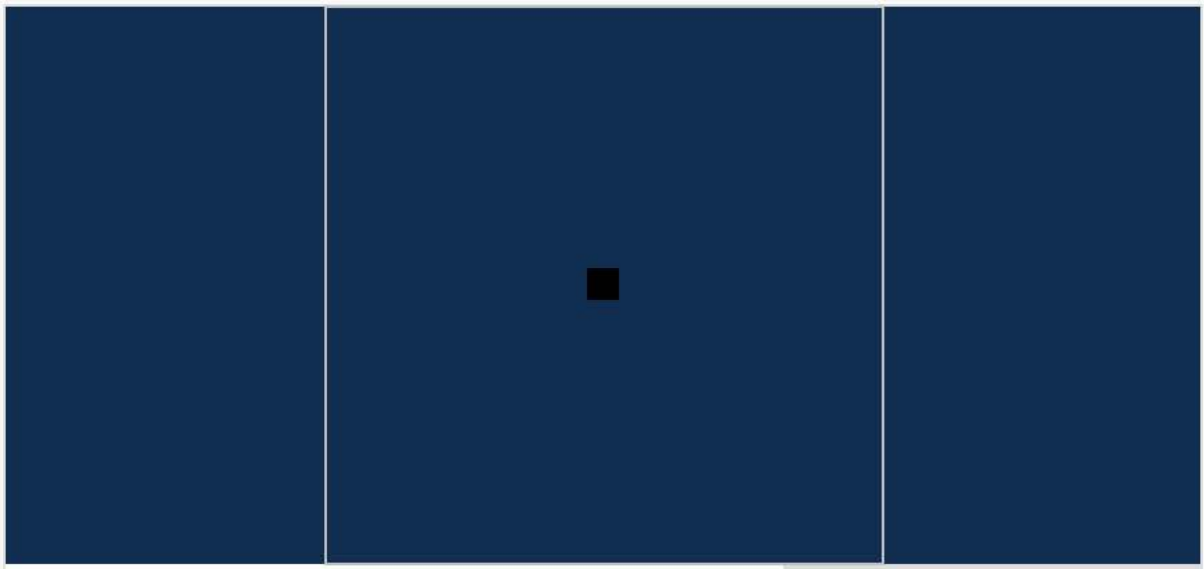
Bureau and a representative sampling of the most important and relevant news coverage and commentary. Opinions expressed above do not belong to the Census Bureau, or its staff. English translations, in summary form, have been provided for all in-language articles included in this report.

This is an official email from the U.S. Census Bureau. If you have any questions or comments, please contact us (http://www.census.gov/about/contact-us.html).

AMERICAN OVERSIGHT

From: Tommy Wright (CENSUS/CSRM FED)
To: Marsha Wright
Subject: Fw: U.S. Census Bureau Daily News - Tuesday, June 23, 2020
Date: Tuesday, June 23, 2020 12:46:30 PM

From: U.S. Census Bureau <census@subscriptions.census.gov>
Sent: Tuesday, June 23, 2020 9:48 AM
To: Tommy Wright (CENSUS/CSRM FED) <Tommy.Wright@census.gov>
Subject: U.S. Census Bureau Daily News - Tuesday, June 23, 2020



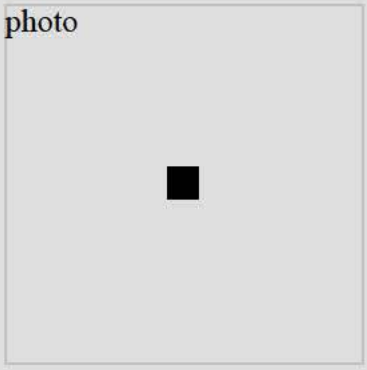
Census Daily News Digest

June 23, 2020

Full Daily Digest

Click Here

photo



2020 Census in the News

Summary

Los Angeles Times reported that 63 percent of California households have responded to the census and examined the importance of increasing response rates in rural areas of the state. Public News Service reported on the

2020 Census Spotlight

NBC Montana reported that Gov. Steve Bullock has directed $530,000 of CARES Act money towards outreach efforts to ensure

AMERICAN OVERSIGHT

resumption of field operations in Arkansas, quoting Michael Cook who emphasized that census workers will not be in contact with the public when dropping off packets at households. Indiana's The Statehouse File explained how the Internet Self Response tool has bolstered response rates, allow people to respond from the safety of their homes during the COVID-19 pandemic.

National & Top-Tier News

View today's national broadcast report.

House Democrats file bill nixing citizenship data-gathering

The Associated Press – Mike Schneider, June 22

President Donald Trump's administration would be barred from gathering citizenship data through administrative records under a bill introduced Monday in the House, marking the latest challenge to an order Trump issued after the Supreme Court nixed his plan to put a citizenship question on the 2020 census.

Census Data in the News

New York, Kentucky among 6 states bracing for voting on Tuesday ABC News

DC is closer to becoming a state now than it has ever been Vox

A Moratorium on Evictions Ends, Leaving Thousands of Tenants Fearful New York Times

Regional 2020 Census News

Atlanta Region

Montanans respond to the 2020 Census. The articles quotes Gov. Bullock who explained at length why responding to the census is so important. Several local outlets in California, including Sacramento's FOX affiliate (KTXL-TV), Fresno's ABC affiliate (KFSN-TV), and San Luis Obispo's NBC affiliate (KSBY-TV) covered a statewide "Census Action Week" to generate more awareness about the 2020 Census. Connecticut's CT Post reported that the state's lieutenant governor was knocking on doors in Bridgeport to increase response rates and raise awareness about the 2020 Census.

Census Bureau Spokespeople in the News

Honolulu Star-Advertiser reported on the Census Bureau's plans to count Hawaii's homeless

AMERICAN OVERSIGHT

View today's broadcast report for the Atlanta Region.

Martha Roby: Complete your 2020 Census today

Montgomery Advertiser – Rep. Martha Roby, June 22

Although these times are unprecedented and the future is uncertain, life continues to carry on. In the midst of the pandemic, the U.S. Census Bureau is conducting the 2020 Census, marking the twenty-fourth time the country has counted the population since 1790.

Gaston leaders discuss 2020 Census

Gaston Gazette [NC] – Gavin Stewart, June 22

A panel of Gaston County leaders held a virtual town hall last week to discuss the 2020 Census, census updates and how it affects county residents. In response to COVID-19, the U.S. Census Bureau extended the census survey competition deadlines from July 31 to Oct. 31.

Where does your city or town rank in the latest U.S. Census participation rates?

Cherokee Tribune and News Ledger [GA] – Dan Carden, June 22

Hoosiers are doing a better job responding to the 2020 U.S. Census than residents of most other states, but tens of thousands of Indiana residents, including many in the Region, still have yet to participate in the once-a-decade count of the nation's population.

Chicago Region

View today's broadcast report for the Chicago

population in September, quoting a local Census Bureau spokesperson. sPuerto Rico's Radio Loíza interviewed a Census Bureau spokesperson who emphasized the importance of the 2020 Census, and explained types of questions that are asked on the questionnaire.

Multicultural News

HARNESS' LATEST MISSION IS MAKING SURE YOU KNOW YOU COUNT

HOLA! – Tionah Lee, June 22

Together, with the help of more of their celebrity friends and grassroots leaders, they have created an organization that most recently caters to lending a hand when it comes to completing the 2020 Census with their new #BeCounted campaign and continue to raise awareness

AMERICAN OVERSIGHT

Region.

Michigan becomes first state to surpass 2010 census response rate

The Oakland Press [MI] – Natalie Broda, June 23

Michigan is the first state in the nation to surpass its 2010 response rate for the 2020 decennial census. The state hit a 67.8% response rate on Thursday, June 18. In 2010, Michigan's total census response rate was 67.7% percent. Michigan is tied for the third-highest response rate nationwide.

Census Workers to Begin Visiting Households

Public News Service [AR] – Nadia Ramaglan, June 23

Census workers will hit the ground in person next month, gearing up efforts to contact households that have not yet responded to the national survey. Door-to-door visits will continue through the end of October, as the agency recently extended the response deadline to account for delays brought on by the novel coronavirus pandemic.

Online surveys help data collection for 2020 census during COVID-19 pandemic

The Statehouse File [IN] – Hope Shrum, June 22

While the COVID-19 pandemic has forced the 2020 U.S. Census to stop much of its in-person data collecting, the use of the internet has helped the bureau to collect millions of responses so far.

Where does your city or town rank in the latest

about communities that were disproportionately affected by the coronavirus.

Doubts when filling the census

Primera Hora [PR] – June 18, 2020

Filling out the 2020 Census questionnaire is something simple that takes a few minutes, but at the same time it is essential so that all the people who live in the archipelago of Puerto Rico can be counted and taken into account when distributing the resources assigned to a diversity of socio-economic development and social assistance programs. It was a multimedia platform interview (digital, print and video).

Radio Interview with Giselle Laffitte

Radio Loíza [PR] – June 17, 2020

In an one-hour interview with digital Radio Loíza outlet, the local

AMERICAN OVERSIGHT

U.S. Census participation rates?

KPC Media Group [IN] – Dan Carden, June 22

Hoosiers are doing a better job responding to the 2020 U.S. Census than residents of most other states, but tens of thousands of Indiana residents, including many in the Region, still have yet to participate in the once-a-decade count of the nation's population.

Census Response Rates Down In Area Counties When Compared To 2010

The Gazette Democrat [IL] – Staff Writer, June 22

Southern Seven Health Department continues to work to promote participation by area residents in the 2020 national census. The health department, which serves Union County and six other area counties, reported that the U.S. Census Bureau planned to resume the Enumerate Operation on June 14.

2020 Census operational adjustments due to COVID-19

Kenosha News [WI] – Katherine Marks, June 22

The 2020 Census is underway — more than half the households across America have responded — and more are responding every day. Online, phone and mailed self-responses will continue throughout the data collection process.

Denver Region

View today's broadcast report for the Denver Region.

Amarillo residents given opportunity to win prizes by completing 2020 Census

spokesperson Giselle Laffitte explained the importance of the 2020 Census and the discussion or explanation of all the questions asked on the questionnaire.

AMERICAN OVERSIGHT

questionnaire

KFDA-TV [TX] – Vanessa Garcia, June 23

Amarillo residents have a chance to win a prize by completing the 2020 Census questionnaire during the month of June. The 2020 Census Neighborhood Project, sponsored by the North Heights Advisory Association, the San Jacinto, Neighborhood Association and the Barrio Neighborhood Planning Committee, can be attended at various locations.

Bullock directs coronavirus relief funds toward census efforts

NBC Montana [MT] – McKayla Haack, June 22

Gov. Steve Bullock is putting $530,000 of CARES Act money toward getting more Montanans to fill out the U.S. Census. Montana is lagging in census response, and Bullock says we need to pick it up -- there is a lot on the line for our rural state.

Horsford introduces measure to nullify Trump order to determine immigration status of the U.S. population

The Nevada Independent [NV] – Humberto Sanchez, June 22

A White House executive order issued last year requiring the sharing of federal citizenship data with the Commerce Department would be repealed under legislation introduced by Rep. Steven Horsford Monday.

One In Three Kansas Households Has Yet To Fill Out Census

KBIA-FM [KS] – Celia Llopis-Jepsen, June 22

AMERICAN OVERSIGHT

Amid a pandemic that has slowed efforts to count Americans, more than a third of Kansas households haven't yet responded to the U.S. Census. In some counties, especially in rural areas, less than half of the population has filled out the forms that help steer billions in federal dollars and resources to the state each year.

Citizens encouraged to respond to Census

The Duncan Banner [OK] – Tamara Gregor, June 22

Every person counts and every person matters, according to Julie Sanders with Southwestern Oklahoma Development Authority (SWODA) and representative for the 2020 Census, who encouraged those in the area to fill out the questionnaire as soon as possible.

We should all stand up and be counted in the census

The Daily News [TX] – Jack Evins, June 22

Apparently, many of our state and national leaders are willing to discount or devalue significant portions of the populations they purport to govern. Indeed, for certain purposes, they'd prefer that many be uncounted, their lives ignored.

Los Angeles Region

View today's broadcast report for the Los Angeles Region.

Federal census of isle homeless is rescheduled for September

Honolulu Star-Advetiser [HI] – Dan Nakaso, June 23

AMERICAN OVERSIGHT

The once-every-decade federal census of Hawaii's homeless population — which has been pushed to late September because of the COVID-19 pandemic — has the potential to affect Hawaii's share of $800 billion in federal spending over the next 10 years, according to federal officials.

Newsletter: Coronavirus puts California's census effort at risk

Los Angeles Times [CA] – John Myers, June 22

Much has been written about the high stakes involved in this year's census and rightly so: The once-a-decade national population tally is a key building block for drawing political maps and for fairly allocating billions of dollars in federal aid.

Census workers urge Valley to send in their responses

KFSN-TV [CA] - Dale Young, June 22

Census caravans fanned out into valley neighborhoods to stress the importance of being counted.

SLO, Santa Barbara County residents U.S. Census response rates higher than state, national average

KSBY-TV [CA] – Aja Goare, June 22

Residents of San Luis Obispo and Santa Barbara Counties have been completing the U.S. Census survey at a higher rate than the state and national average but the return rate is still lower than the last Census.

Push to complete census count

KTXL-TV [CA] – Staff Writer, June 22

AMERICAN OVERSIGHT

California is launching a major push to reach hundreds of thousands of people who haven't filled out their 2020 Census form yet. Richard spoke to California Senator Richard Pan about why California is a challenging state to count and what's being done to support a complete count.

New York Region

View today's broadcast report for the New York Region.

Bysiewicz takes to the street to try to lift Bridgeport census numbers

CT Post [CT] – Michael Mayko, June 22

It's all about the money. Municipalities across the state stand to lose $2,900 per household a year in federal funding for each resident whose family fails to complete the census form, $29,000 per household over the 10 years of the census.

Philadelphia Region

View today's broadcast report for the Philadelphia Region.

Ottawa County last in state for census response at 47.2%

Fremont News Messenger [OH] – Craig Shoup, June 22

Local counties are in danger of losing out on millions of federal tax dollars distributed each year based on census data. Ottawa County could see the biggest loss, as the county ranks last in Ohio in self-response rate with 47.2% of the estimated population returning census

AMERICAN OVERSIGHT

data.

[Census offices reopen from COVID-19 shutdown; 'Update Leave' operation begins]

The Bryan Times [OH] – Ron Osburn, June 22

If you get your mail form a post office box, or for any reason do not get mail delivered to your physical address, you may be receiving a packet left at your door from the U.S. Census Bureau.

[66 percent of county residents have responded to census]

Record Herald [OH] – Jennifer Woods, June 22

As the 2020 Census continues, 66.2 percent of Fayette County residents have reportedly responded to the census so far. The last reported total in early June was 65.4 percent.

About Census Daily News Digest

Census media monitoring is a daily compendium of articles about the Census Bureau and a representative sampling of the most important and relevant news coverage and commentary. Opinions expressed above do not belong to the Census Bureau, or its staff. English translations, in summary form, have been provided for all in-language articles included in this report.

This is an official email from the U.S. Census Bureau. If you have any questions or comments, please contact us (http://www.census.gov/about/contact-us.html).

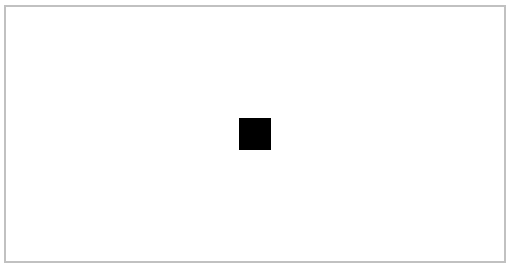
AMERICAN OVERSIGHT

(b) (6)

AMERICAN OVERSIGHT

From: Chad Eric Russell (CENSUS/CSRM FED)
To: Tommy Wright (CENSUS/CSRM FED)
Subject: Judge bars citizenship question from 2020 Census
Date: Tuesday, January 15, 2019 11:33:41 AM

https://apnews.com/c39334f65f99465582b49489c5077781



Judge bars citizenship question from 2020 Census

apnews.com

NEW YORK (AP) — A federal judge in New York has barred the Trump administration from adding a question about citizenship to the 2020 census. U.S. District Judge Jesse Furman said Tuesday that while such

---

Chad Eric Russell, IT Specialist, Center for Statistical Research and Methodology, U.S. Census Bureau
Office 301.763.3215 Chad.Eric.Russell@census.gov
census.gov Connect with us on Social Media

AMERICAN OVERSIGHT

From: Nancy A Bates (CENSUS/ADRM FED)
To: John Maron Abowd (CENSUS/ADRM FED); Tommy Wright (CENSUS/CSRM FED)
Cc: Gina K Walejko (CENSUS/DSSD FED)
Subject: need statistical reviewer for AAPOR paper
Date: Monday, February 25, 2019 11:04:58 AM

John/Tommy:

(b) (5) [redacted]

Nancy A. Bates
Senior Researcher for Survey Methodology
Research and Methodology Directorate
U.S. Census Bureau

Office 301.763.5248 Room (b) (6) [redacted]
cell: (b) (6) [redacted]
nancy.a.bates@census.gov

census.gov
Connect with us on Social Media

AMERICAN OVERSIGHT

Begin forwarded message:

From: Andy Beveridge <(b) (6)
Date: April 24, 2019 at 06:25:29 EDT
To: "AAPORnet" <aapor-net@groups.aapor.org>
Subject: [aapor-net] Fwd: Census Citizenship and Social Explorer
Reply-To: Andy Beveridge (b) (6)

Dear All:

As you must know the Supreme Court heard arguments on the citizenship question, and a decision is expected by the end of June. We created a tool, which we are updating and making more general to track the effect of using citizenship for redistricting, and we will soon add using it for apportioning Congress.

We put up a blog about it, which include interactive maps so you can see what would happen anywhere in the US to Congressional and State Legislative districts, if they were drawn on the basis of citizens and not everyone. The first couple graphs are below. Here is the link:
https://www.socialexplorer.com/blog/post/social-explorer-tool-demonstrates-the-potential-impact-of-the-census-citizenship-question-9546

"The Trump administration seeks to add a new question to the 2020 Census asking the citizenship of all people in the country. The current U.S. Census asks 10 demographic questions, such as age, race, gender and who lives in the household. Responses to the new question could radically change redistricting in America. The fate of the proposed citizenship question is up to the Supreme Court, which heard oral arguments in the case of Department of Commerce v. New York on April 23rd with a ruling expected by June.

Social Explorer developed an interactive tool to explore the potential impact of such a question. The online tool uses population data from the 2010 Census and citizenship data from the 2013-2017 American Community Survey to demonstrate the way districts would need to be redrawn for Congress and State Legislatures. Currently, all congressional districts are drawn based upon total population and are equal in size, but legislators in Texas, Arizona, Missouri and Nebraska would like to change that and use either the number of citizens or the number of eligible voters (called Citizens of Voting Age)."

AMERICAN OVERSIGHT

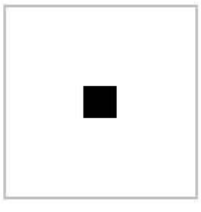
The New York Times used this in a article on the opinion, which includes Social Explorer maps:
https://www.nytimes.com/2019/04/23/us/noncitizens-census-political-maps.html

How the Supreme Court's Decision on the Census Could Alter American Politics
By Michael Wines
April 23, 2019

HOUSTON — Studded with taquerias and Catholic churches on street after street, the 29th Congressional District of Texas has among the highest proportions of Hispanics in the country.
But the fact that the district — which traces a jagged semicircle around Houston's east side — is three-quarters Hispanic may not be its most defining statistic.
These days, the most important number may be the estimated share of its residents who are not American citizens: one in four.
A battle is brewing over the way the nation tallies its population, especially in immigrant-dense places like Texas's 29th District, that could permanently alter the American political landscape. On Tuesday, the Supreme Court's conservative majority appeared ready to allow the next census in 2020 to ask respondents if they are American citizens — a question that has never been asked of all the nation's residents in the census's 230-year history.

Hope to see you soon. Ahmed is in next week, but I think you are in San Francisco.

Andy



Andrew A. Beveridge
President and Co-Founder
Social Explorer | Explore your world, share your insights
(b) (6)
www.socialexplorer.com

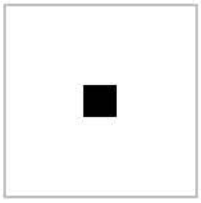
Become a fan on Facebook! http://www.facebook.com/pages/Social-Explorer/110325499019530
Follow us on Twitter @socialexplorer

Prof of Sociology Queens College and Grad Ctr CUNY

AMERICAN OVERSIGHT

Office: (b) (6)
Email: (b) (6)
233D Powdermaker Hall
65-30 Kissena Blvd
Queens, NY 11367-1597

--



Andrew A. Beveridge
President and Co-Founder
Social Explorer | Explore your world, share your insights
(b) (6)
www.socialexplorer.com

Become a fan on Facebook! http://www.facebook.com/pages/Social-Explorer/110325499019530
Follow us on Twitter @socialexplorer

Prof of Sociology Queens College and Grad Ctr CUNY
Office (b) (6)
Email: (b) (6)
233D Powdermaker Hall
65-30 Kissena Blvd
Queens, NY 11367-1597

Too many emails from AAPORnet?
Change your settings here: https://www.aapor.org/My-AAPOR/AAPORnet-Listserv.aspx

AMERICAN OVERSIGHT

You are invited to participate in a webinar on 2019 Census Test Preliminary Results. The Census Bureau conducted a nationally representative self-response test to measure the operational effect of including a citizenship question on self-response rates. The 2019 Census Test Preliminary Results webinar will provide a short overview of the 2019 Census Test as well as preliminary results from the test.

Please note that the preliminary results from the test are being shared with the Committee prior to the public release scheduled for October 31. We appreciate your discretion until then.

- **Date of webinar**: October 30, 2019
- **Time start and (expected) end:** 2:00 pm - 3:00 pm (Eastern)

Below are the WebEx login details, and the Verizon audio conference call in details.

WebEx (b) (5) [redacted]

Audio (b) (5) [redacted] Attendees must call in by telephone to hear the audio)

Kim Leonard
External Stakeholder Program Manager
Office of Program, Performance and Stakeholder Integration (PPSI)
301-763-7281 (office)
(b) (6) [redacted] *(mobile)*

AMERICAN OVERSIGHT

From: Tommy Wright (CENSUS/CSRM FED)
To: Kimberly L Leonard (CENSUS/PPSI FED)
Subject: Re: 2019 Census Test Preliminary Results
Date: Monday, October 21, 2019 10:03:27 AM

Thanks, Kim.

By the way, I am (b) (6) and will miss the webinar.

Sincerely,

Tommy

From: Kimberly L Leonard (CENSUS/PPSI FED) <kimberly.l.leonard@census.gov>
Sent: Monday, October 21, 2019 9:48 AM
To: (b) (6) <(b) (6) ;(b) (6)
Cc: Enid Santanaortiz(CENSUS/ADDC FED) <Enid.Santanaortiz@census.gov>
Subject: 2019 Census Test Preliminary Results

Dear Advisory Committee Members,

You are invited to participate in a webinar on 2019 Census Test Preliminary Results. The Census Bureau conducted a nationally representative self-response test to measure the operational effect of including a citizenship question on self-response rates. The 2019 Census Test Preliminary Results webinar will provide a short overview of the 2019 Census Test as well as preliminary results from the test.

Please note that the preliminary results from the test are being shared with the Committee prior to the public release scheduled for October 31. We appreciate your discretion until then.

- **Date of webinar**: October 30, 2019
- **Time start and (expected) end:** 2:00 pm - 3:00 pm (Eastern)

Below are the WebEx login details, and the Verizon audio conference call in details.

WebEx: (b) (5)
Audio: (b) (6) (Attendees must call in by telephone to hear the

AMERICAN OVERSIGHT

audio)

Kim Leonard
External Stakeholder Program Manager
Office of Program, Performance and Stakeholder Integration (PPSI)
301-763-7281 (office)
(b) (6) *(mobile)*

AMERICAN OVERSIGHT

From:	(b) (6)
To:	Kimberly L Leonard (CENSUS/PPSI FED); (b) (6) ; (b) (6)
Cc:	Enid Santanaortiz(CENSUS/ADDC FED)
Subject:	RE: 2019 Census Test Preliminary Results
Date:	Monday, October 21, 2019 10:17:56 AM
Attachments:	image001.png

Thanks.
I plan to attend.

Inderdeep Chatrath, Ph.D.
Assistant Vice President
Office for Institutional Equity
Smith Warehouse | Bay 8, 1st Floor | B 111
(O) (b) (6) | (E) (b) (6)

Duke | Office for INSTITUTIONAL EQUITY
Building an inclusive community

From: Kimberly L Leonard (CENSUS/PPSI FED) <kimberly.l.leonard@census.gov>
Sent: Monday, October 21, 2019 9:49 AM
To: (b) (6) (b) (6) >; (b) (6)
Cc: Enid Santanaortiz(CENSUS/ADDC FED) <Enid.Santanaortiz@census.gov>
Subject: 2019 Census Test Preliminary Results

Dear Advisory Committee Members,

You are invited to participate in a webinar on 2019 Census Test Preliminary Results. The Census Bureau conducted a nationally representative self-response test to measure the operational effect of including a citizenship question on self-response rates. The 2019 Census Test Preliminary Results webinar will provide a short overview of the 2019 Census Test as well as preliminary results from the test.

Please note that the preliminary results from the test are being shared with the Committee prior to the public release scheduled for October 31. We appreciate your discretion until then.

- **Date of webinar**: October 30, 2019
- **Time start and (expected) end:** 2:00 pm - 3:00 pm (Eastern)

AMERICAN OVERSIGHT

Below are the WebEx login details, and the Verizon audio conference call in details.

WebEx: (b) (5) [redacted]
(b) (5) [redacted] (Attendees must call in by telephone to hear the audio)

Kim Leonard
External Stakeholder Program Manager
Office of Program, Performance and Stakeholder Integration (PPSI)
301-763-7281 (office)
(b) (6) [redacted] *(mobile)*

AMERICAN OVERSIGHT

From: Kristin Moore
To: Enid Santanaortiz(CENSUS/ADDC FED); allisonp@(b) (6) (CENSUS/ OTHER); Andrew.A.Samwick@(b) (6) (CENSUS/ OTHER); Deborah.(b) (6) FJay.Breidt@(b) (6) levisjackd@(b) (6) jeff.lower@(b) (6) (CENSUS/ OTHER); juanpablo-hourcade@(b) (6) (CENSUS/ OTHER); krishnar@(b) (6) (CENSUS/ OTHER); kunal@(b) (6) ; llewellynfischer@(b) ; marazzi.m@(b) (6) ; glynn@(b) (6) (CENSUS/ OTHER); jwhitley@(b) (6) ; rwinkler@(b) (6) ; jczajka@(b) (6) KPettit@(b) (6) (CENSUS/ OTHER); simonsonk@(b) (CENSUS/ OTHER)
Cc: Kimberly L Leonard (CENSUS/PPSI FED); Tommy Wright (CENSUS/CSRM FED)
Subject: RE: 2019 CSAC Fall Meeting Recommendations submitted
Date: Wednesday, September 18, 2019 2:51:39 PM

(b) (5)

I am pleased that references to the undercount of children and data about children appear in multiple sections of the document.

Regards to All - Kris

Kristin Anderson Moore, Ph.D. | Senior Scholar
7315 Wisconsin Ave, Ste 1200W | Bethesda, MD 20814
(b) (6)

Research to improve children's lives

From: Enid Santanaortiz(CENSUS/ADDC FED) <Enid.Santanaortiz@census.gov>
Sent: Wednesday, September 18, 2019 12:34 PM
To: allisonp@(b) (6) (CENSUS/ OTHER) <allisonp@(b) (6) Andrew.A.Samwick@(b) (6) (CENSUS/ OTHER) <Andrew.A.Samwick@(b) (6) Deborah.Balk@(b) (6) FJay.Breidt@(b) (6) levisjackd@(b) (6) jeff.lower@(b) (6) (CENSUS/ OTHER) <jeff.lower@(b) (6) juanpablo-hourcade@(b) (6) (CENSUS/ OTHER) <juanpablo-hourcade@(b) (6) krishnar@(b) (6) (CENSUS/ OTHER) <krishnar@(b) (6) kunal@(b) (6) llewellynfischer@(b) (6) marazzi.m@(b) (6) glynn@(b) (6) (CENSUS/ OTHER) <glynn@s(b) (6) jwhitley@(b) (6) rwinkler@(b) (6) jczajka@(b) (6) KPettit@(b) (6) (CENSUS/ OTHER) <KPettit@(b) (6) simonsonk@(b) (6) (CENSUS/ OTHER) <simonsonk@(b) (6) Kristin Moore <kmoore@(b) (6)
Cc: Kimberly L Leonard (CENSUS/PPSI FED) <kimberly.l.leonard@census.gov>; Tommy Wright (CENSUS/CSRM FED) <Tommy.Wright@census.gov>
Subject: 2019 CSAC Fall Meeting Recommendations submitted

Good afternoon dear CSAC members,

AMERICAN OVERSIGHT

Attached is the formatted document with the recommendations you all submitted on Friday, September 13.

Please review and let me know if any change is needed by COB tomorrow Thursday, September 19 as this document is going out to the Director's office to start the process of requesting responses from SME areas.

Let me know if you have any question.

Thanks,

Enid Santana

Program Coordinator

Advisory Committee Management Branch

Office of Program, Performance and Stakeholder Integrations (PPSI)

U.S. Census Bureau

Office: 301.763.1781 Room (b) (6)

enid.santanaortiz@census.gov

Connect with us on census.gov and Social Media

AMERICAN OVERSIGHT

From: John Czajka
To: kmoore@(b) (6) Enid Santanaortiz(CENSUS/ADDC FED); allisonp@(b) (6) (CENSUS/ OTHER); Andrew.A.Samwick@(b) (6) (CENSUS/ OTHER); Deborah.Balk@(b) (6) FJay.Breidt@(b) (6) levisjackd@(b) (6) jeff.lower@(b) (6) (CENSUS/ OTHER); juanpablo-hourcade@(b) (6) (CENSUS/ OTHER); krishnar@(b) (6) (CENSUS/ OTHER); kunal@(b) (6) llewellynfischer@(b) (6) marazzi.m@(b) (6) glynn@(b) (6) (CENSUS/ OTHER); jwhitley@(b) (6) rwinkler@(b) (6) KPettit@(b) (6) (CENSUS/ OTHER); simonsonk@(b) (CENSUS/ OTHER)
Cc: Kimberly L Leonard (CENSUS/PPSI FED); Tommy Wright (CENSUS/CSRM FED)
Subject: RE: 2019 CSAC Fall Meeting Recommendations submitted
Date: Wednesday, September 18, 2019 2:58:40 PM

The citizenship data referenced in that paragraph are the administrative data-based "best" estimate of citizenship that John Abowd described in his presentation. While Allison's email indicates that we cannot change the text, the Bureau will certainly know what we mean.

From: Kristin Moore [mailto:kmoore(b) (6)
Sent: Wednesday, September 18, 2019 2:51 PM
To: Enid Santanaortiz(CENSUS/ADDC FED) <Enid.Santanaortiz@census.gov>; allisonp@(b) (6) (CENSUS/ OTHER) <allisonp@(b) (6) Andrew.A.Samwick@(b) (6) (CENSUS/ OTHER) <Andrew.A.Samwick@(b) (6) Deborah.Balk@(b) (6) FJay.Breidt@(b) (6) levisjackd@(b) (6) jeff.lower@(b) (6) (CENSUS/ OTHER) <jeff.lower@(b) (6) juanpablo-hourcade@(b) (6) (CENSUS/ OTHER) <juanpablo-hourcade@(b) (6) krishnar@(b) (6) (CENSUS/ OTHER) <krishnar@(b) (6) kunal@(b) (6) llewellynfischer(b) (6) marazzi.m@(b) (6) glynn@(b) (6) (CENSUS/ OTHER) <glynn@(b) (6) jwhitley@(b) (6) rwinkler@(b) (6) John Czajka <JCzajka@(b) (6) KPettit@(b) (6) (CENSUS/ OTHER) <KPettit@(b) (6) simonsonk@(b) (6) (CENSUS/ OTHER) <simonsonk@(b) (6)
Cc: Kimberly L Leonard (CENSUS/PPSI FED) <kimberly.l.leonard@census.gov>; Tommy Wright (CENSUS/CSRM FED) <Tommy.Wright@census.gov>
Subject: RE: 2019 CSAC Fall Meeting Recommendations submitted

(b) (5)

I am pleased that references to the undercount of children and data about children appear in multiple sections of the document.

Regards to All - Kris

Kristin Anderson Moore, Ph.D. | Senior Scholar
7315 Wisconsin Ave, Ste 1200W | Bethesda, MD 20814
(b) (6)

AMERICAN OVERSIGHT

Research to improve children's lives

From: Enid Santanaortiz(CENSUS/ADDC FED) <Enid.Santanaortiz@census.gov>
Sent: Wednesday, September 18, 2019 12:34 PM
To: allisonp@(b) (6) (CENSUS/ OTHER) <allisonp@(b) (6) >; Andrew.A.Samwick@(b) (6) (CENSUS/ OTHER) <Andrew.A.Samwick@(b) (6) >; Deborah.Balk@(b) (6) ; FJay.Breidt@(b) (6) ; levisjackd@(b) (6) ; jeff.lower@(b) (6) (CENSUS/ OTHER) <jeff.lower@(b) (6) ; juanpablo-hourcade@(b) (6) (CENSUS/ OTHER) <juanpablo-hourcade@(b) (6) ; krishnar@(b) (6) (CENSUS/ OTHER) <krishnar@(b) (6) >; kunal@(b) (6) ; llewellynfischer@(b) (6) marazzi.m@(b) (6) ; glynn@(b) (6) (CENSUS/ OTHER) <glynn@(b) (6) >; jwhitley@(b) (6) ; rwinkler@(b) (6) ; jczajka@(b) (6) ; KPettit@(b) (6) (CENSUS/ OTHER) <KPettit@(b) (6) >; simonsonk@(b) (6) (CENSUS/ OTHER) <simonsonk@(b) (6) >; Kristin Moore <kmoore@(b) (6) >
Cc: Kimberly L Leonard (CENSUS/PPSI FED) <kimberly.l.leonard@census.gov>; Tommy Wright (CENSUS/CSRM FED) <Tommy.Wright@census.gov>
Subject: 2019 CSAC Fall Meeting Recommendations submitted

Good afternoon dear CSAC members,

Attached is the formatted document with the recommendations you all submitted on Friday, September 13.

Please review and let me know if any change is needed by COB tomorrow Thursday, September 19 as this document is going out to the Director's office to start the process of requesting responses from SME areas.

Let me know if you have any question.

Thanks,

Enid Santana

Program Coordinator

Advisory Committee Management Branch

Office of Program, Performance and Stakeholder Integrations (PPSI)

AMERICAN OVERSIGHT

U.S. Census Bureau

Office: 301.763.1781 Room (b) (6)

enid.santanaortiz@census.gov

Connect with us on census.gov and Social Media

AMERICAN OVERSIGHT

From: (b) (6)
To: iczajka@(b) (6)
Cc: Andrew.A.Samwick@(b) (6) (CENSUS/ OTHER); Deborah.Balk@(b) (6); Enid Santanaortiz(CENSUS/ADDC FED); FJay.Breidt@(b) (6) u; KPettit@(b) (6) (CENSUS/ OTHER); Kimberly L Leonard (CENSUS/PPSI FED); kmoore@(b) (6); Tommy Wright (CENSUS/CSRM FED); glynn@(b) (6) (CENSUS/ OTHER); jeff.lower@(b) (6) (CENSUS/ OTHER); juanpablo-hourcade@(b) (6) (CENSUS/ OTHER); jwhitley@(b) (6) krishnar@(b) (6) (CENSUS/ OTHER); kunal@(b) (6); levisjackd@(b) (6); llewellynfischer@(b); marazzi.m@(b) (6) rwinkler@(b) (6); simonsonk@(b) (6) (CENSUS/ OTHER)
Subject: Re: 2019 CSAC Fall Meeting Recommendations submitted
Date: Thursday, September 19, 2019 5:36:57 PM

The reference to "citizenship data" is correct as John pointed out

And you Lou for catching a few typos.

On Wed, Sep 18, 2019 at 11:57 AM John Czajka <JCzajka@(b) (6)> wrote:

> The citizenship data referenced in that paragraph are the administrative data-based "best" estimate of citizenship that John Abowd described in his presentation. While Allison's email indicates that we cannot change the text, the Bureau will certainly know what we mean.
>
> ---
>
> **From:** Kristin Moore [mailto:kmoore@(b) (6)]
> **Sent:** Wednesday, September 18, 2019 2:51 PM
> **To:** Enid Santanaortiz(CENSUS/ADDC FED) <Enid.Santanaortiz@census.gov>; allisonp@(b) (6) (CENSUS/ OTHER) <allisonp@(b) (6)>; Andrew.A.Samwick@(b) (6) (CENSUS/ OTHER) <Andrew.A.Samwick@(b) (6)>; Deborah.Balk@(b) (6); FJay (b) (6); levisjackd@(b) (6); jeff.lower@(b) (6) (CENSUS/ OTHER) <jeff.lower@(b) (6)>; juanpablo-hourcade@(b) (6) (CENSUS/ OTHER) <juanpablo-hourcade@(b) (6)>; krishnar@(b) (6) (CENSUS/ OTHER) <krishnar@(b) (6)>; kunal@(b) (6); llewellynfischer@(b) (6) marazzi.m@(b) (6); glynn@(b) (6) (CENSUS/ OTHER) <glynn@(b) (6)>; jwhitley@(b) (6); rwinkler@(b) (6); John Czajka <JCzajka@(b) (6) KPettit@(b) (6) (CENSUS/ OTHER) <KPettit@(b) (6)>; simonsonk@(b) (6) (CENSUS/ OTHER) <simonsonk@(b) (6)>
> **Cc:** Kimberly L Leonard (CENSUS/PPSI FED) <kimberly.l.leonard@census.gov>; Tommy Wright (CENSUS/CSRM FED) <Tommy.Wright@census.gov>
> **Subject:** RE: 2019 CSAC Fall Meeting Recommendations submitted
>
> (b) (5)

AMERICAN OVERSIGHT

(b) (5) [redacted]

Regards to All - Kris

Kristin Anderson Moore, Ph.D. | Senior Scholar

7315 Wisconsin Ave, Ste 1200W | Bethesda, MD 20814

(b) (6) [redacted]

Research to improve children's lives

From: Enid Santanaortiz(CENSUS/ADDC FED) <Enid.Santanaortiz@census.gov>
Sent: Wednesday, September 18, 2019 12:34 PM
To: allisonp@(b) (6) [redacted] (CENSUS/ OTHER) <allisonp@(b) (6) [redacted]>; Andrew.A.Samwick@(b) (6) [redacted] (CENSUS/ OTHER) <Andrew.A.Samwick@(b) (6) [redacted]>; Deborah.Balk@(b) (6) [redacted]; FJay.Breidt@(b) (6) [redacted]; levisjackd@(b) (6) [redacted]; jeff.lower@(b) (6) [redacted] (CENSUS/ OTHER) <jeff.lower@(b) (6) [redacted]m>; juanpablo-hourcade@(b) (6) [redacted] (CENSUS/ OTHER) <juanpablo-hourcade@(b) (6) [redacted]>; krishnar@(b) (6) [redacted] (CENSUS/ OTHER) <krishnar@(b) (6) [redacted]>; kunal@(b) (6) [redacted]; llewellynfischer(b) (6) [redacted]; marazzi.m@(b) (6) [redacted]; glynn@(b) (6) [redacted] (CENSUS/ OTHER) <glynn@(b) (6) [redacted]; jwhitley@(b) (6) [redacted]; rwinkler@(b) (6) [redacted] jczajka@(b) (6) [redacted]; KPettit@(b) (6) [redacted] (CENSUS/ OTHER) <KPettit@(b) (6) [redacted]>; simonsonk@(b) (6) [redacted] (CENSUS/ OTHER) <simonsonk@(b) (6) [redacted]>; Kristin Moore <kmoore@(b) (6) [redacted]>
Cc: Kimberly L Leonard (CENSUS/PPSI FED) <kimberly.l.leonard@census.gov>; Tommy Wright (CENSUS/CSRM FED) <Tommy.Wright@census.gov>
Subject: 2019 CSAC Fall Meeting Recommendations submitted

Good afternoon dear CSAC members,

AMERICAN OVERSIGHT

Attached is the formatted document with the recommendations you all submitted on Friday, September 13.

Please review and let me know if any change is needed by COB tomorrow Thursday, September 19 as this document is going out to the Director's office to start the process of requesting responses from SME areas.

Let me know if you have any question.

Thanks,

Enid Santana

Program Coordinator

Advisory Committee Management Branch

Office of Program, Performance and Stakeholder Integrations (PPSI)

U.S. Census Bureau

Office: 301.763.1781 Room (b) (6)

enid.santanaortiz@census.gov

Connect with us on census.gov and Social Media

--

Dr. Allison Plyer, MBA, ScD
Chief Demographer
The Data Center
"Independent Analysis for Informed Decisions in Southeast Louisiana"
www.datacenterresearch.org
Follow me on Twitter @allisonplyer

AMERICAN OVERSIGHT

From: John Maron Abowd (CENSUS/ADRM FED)
To: (b) (6) ; Lisa B Stewart (CENSUS/ADRM FED); (b) (6)
Cc: John L Eltinge (CENSUS/ADRM FED)
Subject: Re: Action Items from OpCom
Date: Tuesday, June 05, 2018 5:11:05 PM

The timeline for item 1 has been revised to Friday, June 8th.

John M. Abowd, PhD
Associate Director and Chief Scientist
Research and Methodology
U.S. Census Bureau

Office 301.763.5880 (simulring on cell) Room (b) (6)
john.maron.abowd@census.gov

census.gov
Connect with us on Social Media

From: John Maron Abowd (CENSUS/ADRM FED)
Sent: Tuesday, June 5, 2018 4:52:23 PM
To: (b) (6) ; Lisa B Stewart (CENSUS/ADRM FED); (b) (6)
Cc: John L Eltinge (CENSUS/ADRM FED)
Subject: Action Items from OpCom

I did double duty since John E was giving his Herriot lecture and enjoying the well-deserved reception. Here are the action items from today's OpCom.

1. The administrative record of the Secretary of Commerce's decision to instruct the Census Bureau to put a question on citizenship onto the 2020 Census has been FOIAed. *Tomorrow, June 6th, the administrative record will be released to the Hill and as a FOIA response on www.census.gov.* This record contains hundreds of emails and internal memos. Everyone in your Centers should be explicitly reminded that all inquries about the citizenship question and this administrative record should be directed to the Office of Public Affairs in the Department of Commerce https://www.commerce.gov/doc/os/office-public-affairs. You may also direct inquiries to our own PIO.
2. The IRS Safeguard Review will run from Tuesday, July 17th through Thursday, July 19th. Even though R&M is an old-hand at Safeguard Reviews, please ensure that any staff invited to pre-Safeguard meetings or Safeguard events accepts those invitations and attends those meetings. Please ask your staffs to look around and make sure that all work and open spaces have been sanitized appropriately.
3. In case you missed the announcement, Karen Dunn Kelley has been nominated as Deputy Secretary of Commerce. Confirmation hearings have not yet been scheduled.

AMERICAN OVERSIGHT

Thanks,

John M. Abowd, PhD
Associate Director and Chief Scientist
Research and Methodology
U.S. Census Bureau

Office 301.763.5880 (simulring on cell) Room (b) (6)
john.maron.abowd@census.gov

census.gov
Connect with us on Social Media

AMERICAN OVERSIGHT

From: Tommy Wright (CENSUS/CSRM FED)
To: (b) (6)
Cc: Andrew Raim (CENSUS/CSRM FED)
Subject: Re: Agenda for the December 4, 2018 DROM Special Session
Date: Tuesday, December 04, 2018 8:21:54 AM

Thanks very much, Thomas.

Sincerely,

Tommy

From: mathew@(b) (6)
Sent: Tuesday, December 4, 2018 7:16:29 AM
To: Tommy Wright (CENSUS/CSRM FED)
Cc: Andrew Raim (CENSUS/CSRM FED)
Subject: Re: Agenda for the December 4, 2018 DROM Special Session

(b) (5)

My comments are given below.

Thomas

(b) (5)

AMERICAN OVERSIGHT

(b) (5)

[redacted]

(b) (5)

[redacted]

AMERICAN OVERSIGHT

From: Andrew Raim (CENSUS/CSRM FED)
To: Tommy Wright (CENSUS/CSRM FED)
Cc: mathew@(b) (6)
Subject: Re: Agenda for the December 4, 2018 DROM Special Session
Date: Tuesday, December 04, 2018 1:26:14 PM

Hi Tommy,

(b) (5)

(b) (5)

Thanks,
Andrew

From: Tommy Wright (CENSUS/CSRM FED)
Sent: Tuesday, December 4, 2018 8:21 AM
To: mathew@(b) (6)

AMERICAN OVERSIGHT

Cc: Andrew Raim (CENSUS/CSRM FED)
Subject: Re: Agenda for the December 4, 2018 DROM Special Session

Thanks very much, Thomas.

Sincerely,

Tommy

From: mathew@(b) (6)
Sent: Tuesday, December 4, 2018 7:16:29 AM
To: Tommy Wright (CENSUS/CSRM FED)
Cc: Andrew Raim (CENSUS/CSRM FED)
Subject: Re: Agenda for the December 4, 2018 DROM Special Session

(b) (5)

My comments are given below.

Thomas

(b) (5)

AMERICAN OVERSIGHT

(b) (5)
[redacted]

[redacted]

[redacted]

AMERICAN OVERSIGHT

From: Tommy Wright (CENSUS/CSRM FED)
To: Andrew Raim (CENSUS/CSRM FED)
Cc: mathew(b) (6)
Subject: Re: Agenda for the December 4, 2018 DROM Special Session
Date: Tuesday, December 04, 2018 5:35:51 PM

Thanks, Andrew. It's not too late. I will take a look.

Sincerely,

Tommy

From: Andrew Raim (CENSUS/CSRM FED)
Sent: Tuesday, December 4, 2018 1:26:13 PM
To: Tommy Wright (CENSUS/CSRM FED)
Cc: mathew@(b) (6)
Subject: Re: Agenda for the December 4, 2018 DROM Special Session

Hi Tommy,

Hopefully this isn't coming too late, but here are my impressions after looking over the report.

(b) (5)

AMERICAN OVERSIGHT

(b) (5) [redacted]

Thanks,
Andrew

From: Tommy Wright (CENSUS/CSRM FED)
Sent: Tuesday, December 4, 2018 8:21 AM
To: mathew@(b) (6) [redacted]
Cc: Andrew Raim (CENSUS/CSRM FED)
Subject: Re: Agenda for the December 4, 2018 DROM Special Session

Thanks very much, Thomas.

Sincerely,

Tommy

From: mathew@(b) (6) [redacted]
Sent: Tuesday, December 4, 2018 7:16:29 AM
To: Tommy Wright (CENSUS/CSRM FED)
Cc: Andrew Raim (CENSUS/CSRM FED)
Subject: Re: Agenda for the December 4, 2018 DROM Special Session

(b) (5) [redacted]

My comments are given below.

Thomas

(b) (5) [redacted]

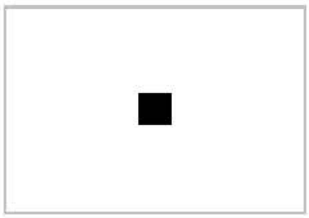
AMERICAN OVERSIGHT

(b) (5)

(b) (5)

(b) (5)

AMERICAN OVERSIGHT



moving the USDA's research units to Kansas City as a "strategic long-term decision," but it appears to be an attempt to undermine the integrity of USDA science and evidence-based policymaking. As ASA Executive Director Ron Wasserstein responded, "Secretary Perdue is well on his way to dismantling a federal statistical agency that is one of the best agricultural economics research institutions in the world, having yet to provide a single justifiable reason for doing so." Pressure from the ASA and other key stakeholders did force the USDA to abandon plans that could have politicized its research, but the ASA will also continue to advocate for keeping these statistical agencies near the national capital.

Read More

EVENTS

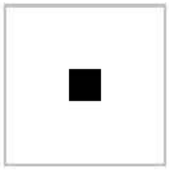
2019 Joint Statistical Meetings
Denver, Colorado
July 27–August 1

Regular registration deadline: July 1

Register

Housing is still available! The Doubletree by Hilton Denver even has room rates as low as $159/night.
Housing deadline: July 3

Book a Room



2019 ASA Biopharmaceutical Section Regulatory-Industry Statistics Workshop
Washington, DC
September 23–25
Advance registration deadline: August 12
Hotel reservation deadline:

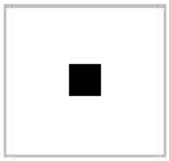
SCIENCE POLICY

BREAKING: The Supreme Court rules to leave the citizenship question blocked for now from the 2020 census, citing the government's explanation for its addition. Read the ASA press release here.
Commerce Department requests comment on newly released draft 2019-2020 Federal Data Strategy Action Plan
ASA urges maintenance of one-hour embargo time for executive branch employee comment after release of Principal Federal Economic Indicators to avoid blurring the distinction between the data and policy comments
ASA recommends Department of Education address understaffing and stringent rules on staffing at the National Center for Education Statistics
After reports of economists leaving USDA in droves, USDA chief scientists from the previous two administrations publish an op-ed expressing deep concern "about the harm being done to scientific integrity at the department"

AMERICAN OVERSIGHT

September 1

Register



2019 Women in Statistics and Data Science Conference
Bellevue, Washington
October 3–5
Early registration deadline: August 15
Housing deadline: September 9

Register

13th International Conference on Health Policy Statistics
San Diego, California
January 6–8, 2020
Contributed and poster abstract submission deadline: June 28

Submit an Abstract

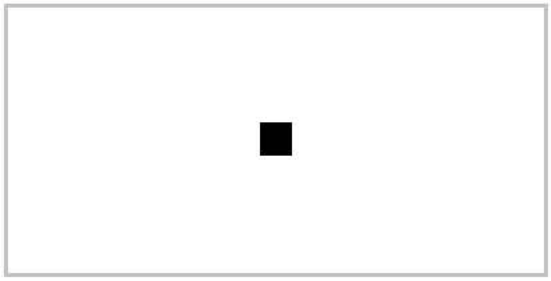
Sixth International Conference on Establishment Statistics
New Orleans, Louisiana
June 15–18, 2020
Topic-contributed session proposal submission opens July 16

More Events

Attending JSM and want to know more about ASA science policy and advocacy? Attend the information and listening session on Thursday, August 1.
Want to know about funding opportunities? Attend this annual panel at JSM with representatives from NIH, NSF, and elsewhere Sunday, July 28, hosted by the Committee on Funded Research
New open-access book by William P. O'Hare: *Differential Undercounts in the U.S. Census: Who Is Missed?*
Want to be more involved in the Count on Stats campaign to boost public confidence and trust in government statistics? Join the Count on Stats LinkedIn group. For more information, contact ASA Science Policy Fellow Daniel Elchert.
Submit your work: NIH is seeking examples of public health and health care accomplishments made possible by behavioral and social science research (not limited to NIH-funded research). Comments and voting close July 31.
ASA urges further consideration and input of a broad expert panel before changing inflation measure used for the official poverty measure and other statistical measures

More Science Policy

ASA NEWS



OTHER NEWS

Check out the latest Stats + Stories episode, "How Do You Measure Frailty," with ASA fellow Karen Bandeen-Roche of Johns Hopkins University. New episodes appear every other Thursday.

AMERICAN OVERSIGHT

K-12 Statistical Ambassador continues to make positive changes for statistics education

How much are you getting paid? Read the results of the ASA's 2018–2019 Academic Salary Survey in the latest issue of *Amstat News*.
ASA Committee on Funded Research webinar recordings online:

- Building Undergraduate Programs in Statistics and Data Science, Mark Daniel Ward, Purdue University: slides | recording
- Behavioral & Social Sciences Research in Health, Elizabeth Ginexi, National Institutes of Health: slides | recording
- Preparing an NSF CAREER proposal, Ana-Maria Staicu, North Carolina State University: slides | recording

Upcoming ASA Webinar:

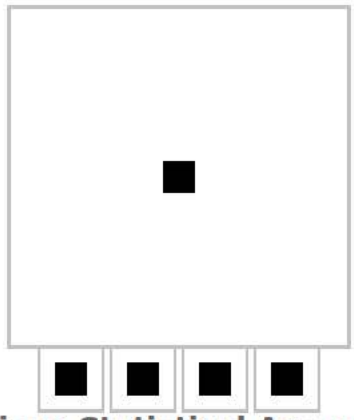
- September 13: Graduate Training Fellowships and Grants: Opportunities and Advice (free!)

More ASA Webinars

2019 Internship Opportunities
Does your organization have an internship available? Post your openings in our annual online listing.

Have you moved in the last few years? Please log in to your ASA account and update your contact information.

AMERICAN OVERSIGHT



American Statistical Association
732 North Washington Street
Alexandria, VA 22314
asainfo@amstat.org | (703)-684-1221 | Visit our website
Having trouble viewing this email? Click here to view in your browser.
Click here to unsubscribe.

AMERICAN OVERSIGHT

From: Julia Coombs (CENSUS/DSSD FED)
To: Misty L Heggeness (CENSUS/ADRM FED)
Cc: Tommy Wright (CENSUS/CSRM FED)
Subject: Re: Citizenship question experiment sample size
Date: Tuesday, March 19, 2019 5:12:34 PM

Hi Misty,

(b) (5)
[redacted]

[redacted]

Julia Coombs, Chief, Census Experiments Branch, Decennial Statistical Studies Division, U.S. Census Bureau
Office 301.763.5747 Cell (b) (6) [redacted] Room (b) (6) [redacted] julia.coombs@census.gov
census.gov Connect with us on Social Media

From: Misty L Heggeness (CENSUS/ADRM FED)
Sent: Tuesday, March 19, 2019 5:02:26 PM
To: Julia Coombs (CENSUS/DSSD FED)
Cc: Tommy Wright (CENSUS/CSRM FED)
Subject: Re: Citizenship question experiment sample size

(b) (5) [redacted]

[redacted]

[redacted]

Best wishes,

Misty

AMERICAN OVERSIGHT

From: Julia Coombs (CENSUS/DSSD FED)
Sent: Monday, March 11, 2019 5:05:03 PM
To: Misty L Heggeness (CENSUS/ADRM FED)
Subject: Citizenship question experiment sample size

Misty,

A sample of 94,652 housing units would allow us to detect a 1.5 percentage point difference in self-response rates and a 2.3 percentage point difference in the match rate of NRFU responses to administrative records. Based on 2010 Census data, the standard error on a 0.14 net undercount rate would be 0.02 for such a sample size.

Let me know if you have questions or if you would like to discuss any of this. Thanks!

Julia Coombs, Chief, Census Experiments Branch, Decennial Statistical Studies Division, U.S. Census Bureau
Office 301.763.5747 Cel (b) (6) Room (b) (6) julia.coombs@census.gov
census.gov Connect with us on Social Media

AMERICAN OVERSIGHT

From: Misty L Heggeness (CENSUS/ADRM FED)
To: Julia Coombs (CENSUS/DSSD FED)
Cc: Tommy Wright (CENSUS/CSRM FED)
Subject: Re: Citizenship question experiment sample size
Date: Tuesday, March 19, 2019 5:21:09 PM

Thanks, Julia, for all you do!

m.

From: Julia Coombs (CENSUS/DSSD FED)
Sent: Tuesday, March 19, 2019 5:12:33 PM
To: Misty L Heggeness (CENSUS/ADRM FED)
Cc: Tommy Wright (CENSUS/CSRM FED)
Subject: Re: Citizenship question experiment sample size

Hi Misty,

(b) (5)
[redacted]

Julia Coombs, Chief, Census Experiments Branch, Decennial Statistical Studies Division, U.S. Census Bureau
Office 301.763.5747 Cell (b) (6) [redacted] Room (b) (6) [redacted] julia.coombs@census.gov
census.gov Connect with us on Social Media

From: Misty L Heggeness (CENSUS/ADRM FED)
Sent: Tuesday, March 19, 2019 5:02:26 PM
To: Julia Coombs (CENSUS/DSSD FED)
Cc: Tommy Wright (CENSUS/CSRM FED)
Subject: Re: Citizenship question experiment sample size

(b) (5) [redacted]

[redacted]

AMERICAN OVERSIGHT

(b) (5) [redacted]

Best wishes,

Misty

From: Julia Coombs (CENSUS/DSSD FED)
Sent: Monday, March 11, 2019 5:05:03 PM
To: Misty L Heggeness (CENSUS/ADRM FED)
Subject: Citizenship question experiment sample size

Misty,

A sample of 94,652 housing units would allow us to detect a 1.5 percentage point difference in self-response rates and a 2.3 percentage point difference in the match rate of NRFU responses to administrative records. Based on 2010 Census data, the standard error on a 0.14 net undercount rate would be 0.02 for such a sample size.

Let me know if you have questions or if you would like to discuss any of this. Thanks!

Julia Coombs, Chief, Census Experiments Branch, Decennial Statistical Studies Division, U.S. Census Bureau
Office 301.763.5747 Cell (b) (6) [redacted] Room (b) (6) [redacted] julia.coombs@census.gov
census.gov Connect with us on Social Media

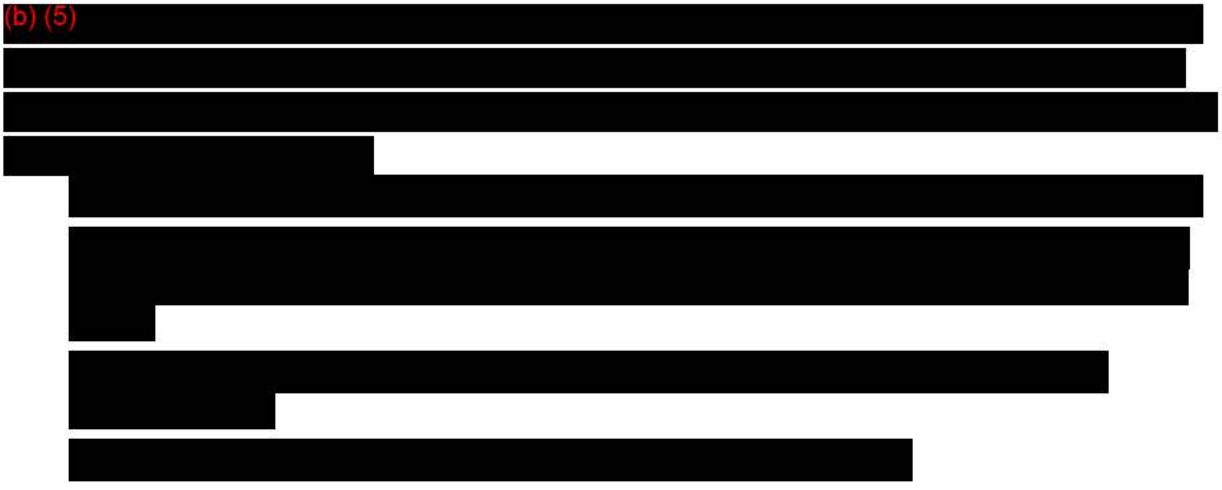
AMERICAN OVERSIGHT

From:	Tara Dunlop Jackson (CENSUS/CLMSO FED)
To:	Burton H Reist (CENSUS/ADDC FED); Erika H Becker Medina (CENSUS/ADDC FED); Farrah Garcia (CENSUS/ADDC FED); Jennifer Shopkorn (CENSUS/ADCOM FED); Misty L Reed (CENSUS/CLMSO FED); Enid Santanaortiz(CENSUS/ADDC FED); Josephine Ocheni (CENSUS/ADDC FED); Tommy Wright (CENSUS/CSRM FED)
Subject:	Re: CSAC Input on CSAC Fall Meeting Agenda
Date:	Tuesday, July 31, 2018 5:09:38 PM

+ DFO Tommy Wright

- **Good afternoon,**
-
- **We received the following excerpt from the new CSAC Chair Allison Plyer. You will soon receive a meeting invitation from Burton so we can sort through what can be possible on the agenda (Highlights added)**
-
- **********
- Thank you for including a report from Administrative Records Data Working Group. The work of this group has come to a conclusion. We will have one final conference call, thus, a short report-out at the Fall CSAC meeting is appropriate. 30 minutes will be more than sufficient for this report out and discussion.
- I know there is discussion about forming a Working Group on using administrative records in the ACS. As such the presentation on Using Administrative Records for Nonemployer Statistics and the American Community Survey will be useful and pertinent.
-

(b) (5)



Thank you for arranging for **John Abowd** to present about Disclosure Protection of Block Level Data and Public Confidentiality. This is an issue of great interest and concern to CSAC. Appreciate your ensuring this is on the agenda.

Given that the Census Bureau is relying on CSAC and NAC to provide needed technical advise about the 2020 Census (in lieu of a dedicated 2020 Census Advisory Committee), more of the

AMERICAN OVERSIGHT

agenda for the CSAC Fall meeting should be dedicated to the 2020 Census. We have only three meetings remaining before Census day, and we must take advantage of each to provide as much technical advise as we can to Census for this ultimately important endeavor.

- (b) (5) [redacted]
- [redacted]

(b) (5) [redacted]

Given this, there are a number of other issues that are of concern to CSAC that CSAC will want to see addressed at the Fall meeting. Specifically, at our Spring meeting we requested information on these topics related to the 2020 Census and the Citizenship Question. These should appear as items on the Fall agenda.

(b) (5) [redacted]

Tara, the CSAC will not understand why so many topics not related to the 2020 Census are on this agenda. Items that could be cut to make way for more discussion of the 2020 Census are:

AMERICAN OVERSIGHT

From: Tommy Wright (CENSUS/CSRM FED)
To: Tara Dunlop Jackson - M1AK
Subject: Re: Hard to Believe...
Date: Tuesday, July 02, 2019 3:45:25 PM

Tara,

How very nice to hear from you and to know that things are going well.

Please keep in mind that we will work through the current matters relating to the 2020 Census. Democracy is a messy thing, and we are seeing it first hand.

Thanks for writing and continued best wishes.

Sincerely,

Tommy

From: Tara Dunlop Jackson - M1AK <tara.dunlop@gsa.gov>
Sent: Tuesday, July 2, 2019 3:01:16 PM
To: Tommy Wright (CENSUS/CSRM FED)
Subject: Hard to Believe...

Dear Tommy,

(b) (6) [redacted]

(b) (6) [redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Tara

--

AMERICAN OVERSIGHT

U.S. General Services Administration

Tara Dunlop Jackson
Committee Management Secretariat
Office of Asset and Transportation Management
Office of Government-wide Policy
Office 202.341.4042
www.gsa.gov

AMERICAN OVERSIGHT

From: Tommy Wright (CENSUS/CSRM FED)
To: Chad Eric Russell (CENSUS/CSRM FED)
Subject: Re: Judge bars citizenship question from 2020 Census
Date: Tuesday, January 15, 2019 12:08:25 PM

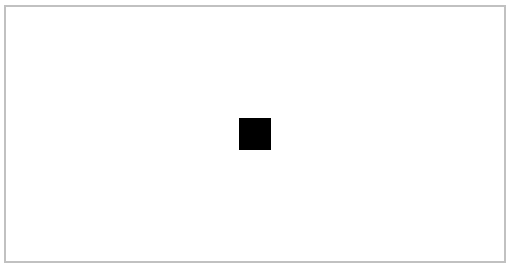
Thanks, Chad.

Sincerely,

Tommy

From: Chad Eric Russell (CENSUS/CSRM FED)
Sent: Tuesday, January 15, 2019 11:33:41 AM
To: Tommy Wright (CENSUS/CSRM FED)
Subject: Judge bars citizenship question from 2020 Census

https://apnews.com/c39334f65f99465582b49489c5077781



Judge bars citizenship question from 2020 Census

apnews.com

NEW YORK (AP) — A federal judge in New York has barred the Trump administration from adding a question about citizenship to the 2020 census. U.S. District Judge Jesse Furman said Tuesday that while such

---

Chad Eric Russell, IT Specialist, Center for Statistical Research and Methodology, U.S. Census Bureau
Office 301.763.3215 Chad.Eric.Russell@census.gov
census.gov Connect with us on Social Media

AMERICAN OVERSIGHT

From:	Nancy A Bates (CENSUS/ADRM FED)
To:	John Maron Abowd (CENSUS/ADRM FED); Tommy Wright (CENSUS/CSRM FED)
Cc:	Gina K Walejko (CENSUS/DSSD FED)
Subject:	Re: need statistical reviewer for AAPOR paper
Date:	Monday, February 25, 2019 12:41:13 PM

They already agreed to by our subject matter reviewers. According to the standards, we must also get a statistical reviewer.

Nancy A. Bates
Senior Researcher for Survey Methodology
Research and Methodology Directorate
U.S. Census Bureau

Office 301.763.5248 Room (b) (6)
cell: (b) (6)
nancy.a.bates@census.gov

census.gov
Connect with us on Social Media

From: John Maron Abowd (CENSUS/ADRM FED)
Sent: Monday, February 25, 2019 12:39:56 PM
To: Nancy A Bates (CENSUS/ADRM FED); Tommy Wright (CENSUS/CSRM FED)
Cc: Gina K Walejko (CENSUS/DSSD FED)
Subject: Re: need statistical reviewer for AAPOR paper

I suggest David Brown or Misty Heggeness--neither is a math stat, but both have extensive experience with natural experiments, and their technical review would be fine.

Thanks,

John M. Abowd, PhD, Associate Director and Chief Scientist
Research and Methodology
U.S. Census Bureau
O: 301-763-5880 (simulring on cell)
census.gov | @uscensusbureau

From: Nancy A Bates (CENSUS/ADRM FED)
Sent: Monday, February 25, 2019 11:04:57 AM
To: John Maron Abowd (CENSUS/ADRM FED); Tommy Wright (CENSUS/CSRM FED)
Cc: Gina K Walejko (CENSUS/DSSD FED)
Subject: need statistical reviewer for AAPOR paper

AMERICAN OVERSIGHT

John/Tommy:

(b) (5) [redacted]

Nancy A. Bates
Senior Researcher for Survey Methodology
Research and Methodology Directorate
U.S. Census Bureau

Office 301.763.5248 Room (b) (6)
cell: (b) (6)
nancy.a.bates@census.gov

census.gov
Connect with us on Social Media

AMERICAN OVERSIGHT

From: John Maron Abowd (CENSUS/ADRM FED)
To: Nancy A Bates (CENSUS/ADRM FED); Tommy Wright (CENSUS/CSRM FED)
Cc: Gina K Walejko (CENSUS/DSSD FED)
Subject: Re: need statistical reviewer for AAPOR paper
Date: Monday, February 25, 2019 1:58:32 PM

Use Suzanne Dorinski, then. She was the math stat on their citizenship work.

Thanks,

John M. Abowd, PhD, Associate Director and Chief Scientist
Research and Methodology
U.S. Census Bureau
O: 301-763-5880 (simulring on cell)
census.gov | @uscensusbureau

From: Nancy A Bates (CENSUS/ADRM FED)
Sent: Monday, February 25, 2019 12:41:11 PM
To: John Maron Abowd (CENSUS/ADRM FED); Tommy Wright (CENSUS/CSRM FED)
Cc: Gina K Walejko (CENSUS/DSSD FED)
Subject: Re: need statistical reviewer for AAPOR paper

They already agreed to by our subject matter reviewers. According to the standards, we must also get a statistical reviewer.

Nancy A. Bates
Senior Researcher for Survey Methodology
Research and Methodology Directorate
U.S. Census Bureau

Office 301.763.5248 Room (b) (6)
cell: (b) (6)
nancy.a.bates@census.gov

census.gov
Connect with us on Social Media

From: John Maron Abowd (CENSUS/ADRM FED)
Sent: Monday, February 25, 2019 12:39:56 PM
To: Nancy A Bates (CENSUS/ADRM FED); Tommy Wright (CENSUS/CSRM FED)
Cc: Gina K Walejko (CENSUS/DSSD FED)
Subject: Re: need statistical reviewer for AAPOR paper

I suggest David Brown or Misty Heggeness--neither is a math stat, but both have extensive

AMERICAN OVERSIGHT

experience with natural experiments, and their technical review would be fine.

Thanks,

John M. Abowd, PhD, Associate Director and Chief Scientist
Research and Methodology
U.S. Census Bureau
O: 301-763-5880 (simulring on cell)
census.gov | @uscensusbureau

From: Nancy A Bates (CENSUS/ADRM FED)
Sent: Monday, February 25, 2019 11:04:57 AM
To: John Maron Abowd (CENSUS/ADRM FED); Tommy Wright (CENSUS/CSRM FED)
Cc: Gina K Walejko (CENSUS/DSSD FED)
Subject: need statistical reviewer for AAPOR paper

John/Tommy:

(b) (5) [redacted]

[redacted]

[redacted]

Nancy A. Bates
Senior Researcher for Survey Methodology
Research and Methodology Directorate
U.S. Census Bureau

Office 301.763.5248 Room (b) (6)
cell: (b) (6) [redacted]
nancy.a.bates@census.gov

census.gov
Connect with us on Social Media

AMERICAN OVERSIGHT

From:	John Maron Abowd (CENSUS/ADRM FED)
To:	Nancy A Bates (CENSUS/ADRM FED); Tommy Wright (CENSUS/CSRM FED)
Cc:	Gina K Walejko (CENSUS/DSSD FED)
Subject:	Re: need statistical reviewer for AAPOR paper
Date:	Monday, February 25, 2019 12:39:59 PM

I suggest David Brown or Misty Heggeness--neither is a math stat, but both have extensive experience with natural experiments, and their technical review would be fine.

Thanks,

John M. Abowd, PhD, Associate Director and Chief Scientist
Research and Methodology
U.S. Census Bureau
O: 301-763-5880 (simulring on cell)
census.gov | @uscensusbureau

From: Nancy A Bates (CENSUS/ADRM FED)
Sent: Monday, February 25, 2019 11:04:57 AM
To: John Maron Abowd (CENSUS/ADRM FED); Tommy Wright (CENSUS/CSRM FED)
Cc: Gina K Walejko (CENSUS/DSSD FED)
Subject: need statistical reviewer for AAPOR paper

John/Tommy:

We need to identify a stat reviewer for our AAPOR paper using CBAMS survey data to examine attitudes pre and post the Citizenship question announcement. Because the survey was already in the field when the announcement was made, we only have a natural experiment, not a randomize controlled experiment.

As a result, we are using nonparametric matching for causal inferences using observational data (Gary King's work).

Do you have someone in mind who could be our statistical reviewer for this paper? thx!

Nancy A. Bates
Senior Researcher for Survey Methodology
Research and Methodology Directorate
U.S. Census Bureau

Office 301.763.5248 Room (b) (6)
cell: (b) (6)
nancy.a.bates@census.gov

AMERICAN OVERSIGHT

census.gov
Connect with us on Social Media

AMERICAN OVERSIGHT

From: Tommy Wright (CENSUS/CSRM FED)
To: Andrew Raim (CENSUS/CSRM FED)
Subject: Re: Request to Review a Decennial Proposed Evaluation
Date: Monday, March 25, 2019 4:12:53 PM

Thanks very much, Andrew.

Sincerely,

Tommy

From: Andrew Raim (CENSUS/CSRM FED)
Sent: Saturday, March 23, 2019 5:41 PM
To: Tommy Wright (CENSUS/CSRM FED)
Subject: Re: Request to Review a Decennial Proposed Evaluation

Hi Tommy,

Here is my feedback, if it's not too late.

(b) (5)

[redacted]

[redacted]

[redacted]

AMERICAN OVERSIGHT

(b) (5) [redacted]

[redacted]

Andrew

--
Andrew M. Raim
Center for Statistical Research & Methodology
U.S. Census Bureau
Office: 301-763-7894

From: Tommy Wright (CENSUS/CSRM FED)
Sent: Tuesday, March 19, 2019 8:28:34 PM
To: Andrew Raim (CENSUS/CSRM FED)
Subject: Request to Review a Decennial Proposed Evaluation

Dear Andrew,

Please review and provide any comments to me by COB Friday 22, 2019.

Sincerely,

Tommy

AMERICAN OVERSIGHT

From: Isaac Dompreh (CENSUS/CSRM FED)
To: Tommy Wright (CENSUS/CSRM FED)
Cc: Martin Klein (CENSUS/CSRM FED)
Subject: Re: Request to Review a Decennial Proposed Evaluation
Date: Friday, March 22, 2019 9:36:41 PM
Attachments: (b) (5) [redacted]

Good evening Tommy,

Please, I have attached here with the summary of notes for including the Citizenship question on the 2020 Decennial Census. This is a major issue that can affect the overall 2020 Decennial Census and can have a long term effect on the credibility of how the U.S. Census Bureau conducts the 2020 Decennial Census and future censuses. The U.S. Census Bureau is an independent government statistical agency that always seek to conduct surveys, censuses and produce good reports.
The issue of including the citizenship question to the 2020 Decennial Census will need a major field test similar to the 2016 test that the agency conducted in Harris County, Texas and Los Angeles County, California in preparation for the 2020 Decennial Census in order to assess the severe impacts that the citizenship question included in the 2020 Decennial Census can have on the agency ability to conduct independent surveys and censuses.

The study plan proposal is a good first step to provide what needs to be done to address the major problems that will be associated with including the citizenship question on the 2020 Decennial Census. Although this is a good study plan but it does not adequately address the cost and significant impact on the data quality that will be associated with including the citizenship question on the 2020 Decennial Census.(b) (5) [redacted]

Thank you.
Sincerely,

Isaac Dompreh,
Research Mathematical Statistician
Statistical Computing Area
Center for Statistical Research and Methodology (CSRM)
Associate Directorate for Research and Methodology (ADRM)
U.S. Census Bureau, Department of Commerce
isaac.dompreh@census.gov
(301)763-6801

From: Tommy Wright (CENSUS/CSRM FED)
Sent: Tuesday, March 19, 2019 8:30:57 PM
To: Isaac Dompreh (CENSUS/CSRM FED)
Cc: Martin Klein (CENSUS/CSRM FED)
Subject: Request to Review a Decennial Proposed Evaluation

AMERICAN OVERSIGHT

Dear Isaac,

Please review and provide any comments to me by COB Friday 22, 2019.

Sincerely,

Tommy

AMERICAN OVERSIGHT

From: Andrew Raim (CENSUS/CSRM FED)
To: Tommy Wright (CENSUS/CSRM FED)
Subject: Re: Request to Review a Decennial Proposed Evaluation
Date: Saturday, March 23, 2019 5:41:05 PM

Hi Tommy,

Here is my feedback, if it's not too late.

(b) (5)

[redacted]

Andrew

AMERICAN OVERSIGHT

--
Andrew M. Raim
Center for Statistical Research & Methodology
U.S. Census Bureau
Office: 301-763-7894

From: Tommy Wright (CENSUS/CSRM FED)
Sent: Tuesday, March 19, 2019 8:28:34 PM
To: Andrew Raim (CENSUS/CSRM FED)
Subject: Request to Review a Decennial Proposed Evaluation

Dear Andrew,

Please review and provide any comments to me by COB Friday 22, 2019.

Sincerely,

Tommy

AMERICAN OVERSIGHT

From: Tommy Wright (CENSUS/CSRM FED)
To: Isaac Dompreh (CENSUS/CSRM FED)
Cc: Martin Klein (CENSUS/CSRM FED)
Subject: Re: Request to Review a Decennial Proposed Evaluation
Date: Monday, March 25, 2019 4:08:13 PM

Thanks very much, Isaac.

Sincerely,

Tommy

From: Isaac Dompreh (CENSUS/CSRM FED)
Sent: Friday, March 22, 2019 9:36:38 PM
To: Tommy Wright (CENSUS/CSRM FED)
Cc: Martin Klein (CENSUS/CSRM FED)
Subject: Re: Request to Review a Decennial Proposed Evaluation

Good evening Tommy,

Please, I have attached here with the summary of notes for including the Citizenship question on the 2020 Decennial Census. This is a major issue that can affect the overall 2020 Decennial Census and can have a long term effect on the credibility of how the U.S. Census Bureau conducts the 2020 Decennial Census and future censuses. The U.S. Census Bureau is an independent government statistical agency that always seek to conduct surveys, censuses and produce good reports.
The issue of including the citizenship question to the 2020 Decennial Census will need a major field test similar to the 2016 test that the agency conducted in Harris County, Texas and Los Angeles County, California in preparation for the 2020 Decennial Census in order to assess the severe impacts that the citizenship question included in the 2020 Decennial Census can have on the agency ability to conduct independent surveys and censuses.

The study plan proposal is a good first step to provide what needs to be done to address the major problems that will be associated with including the citizenship question on the 2020 Decennial Census. Although this is a good study plan but it does not adequately address the cost and significant impact on the data quality that will be associated with including the citizenship question on the 2020 Decennial Census. (b) (5)
[redacted]

Thank you.
Sincerely,

Isaac Dompreh,
Research Mathematical Statistician

AMERICAN OVERSIGHT

Statistical Computing Area
Center for Statistical Research and Methodology (CSRM)
Associate Directorate for Research and Methodology (ADRM)
U.S. Census Bureau, Department of Commerce
isaac.dompreh@census.gov
(301)763-6801

From: Tommy Wright (CENSUS/CSRM FED)
Sent: Tuesday, March 19, 2019 8:30:57 PM
To: Isaac Dompreh (CENSUS/CSRM FED)
Cc: Martin Klein (CENSUS/CSRM FED)
Subject: Request to Review a Decennial Proposed Evaluation

Dear Isaac,

Please review and provide any comments to me by COB Friday 22, 2019.

Sincerely,

Tommy

AMERICAN OVERSIGHT

From: Tommy Wright (CENSUS/CSRM FED)
To: mathew(b) (6)
Subject: Re: Request to Review a Decennial Proposed Evaluation
Date: Friday, March 22, 2019 4:55:32 PM

Thanks very much, Thomas. I will take a look.

Sincerely,

Tommy

From: mathew(b) (6) <mathew(b) (6)>
Sent: Friday, March 22, 2019 1:35:55 PM
To: Tommy Wright (CENSUS/CSRM FED)
Subject: Re: Request to Review a Decennial Proposed Evaluation

(b) (5)

Best,

Thomas

(b) (5)

(b) (5)

AMERICAN OVERSIGHT

(b) (5)
[redacted]

AMERICAN OVERSIGHT

From: Tommy Wright (CENSUS/CSRM FED)
To: Isaac Dompreh (CENSUS/CSRM FED)
Cc: Martin Klein (CENSUS/CSRM FED)
Subject: Re: Request to Review a Decennial Proposed Evaluation
Date: Monday, March 25, 2019 4:14:30 PM

Thanks very much, Isaac.

Do you have any specific suggestions to strengthen the proposal?

Sincerely,

Tommy

From: Isaac Dompreh (CENSUS/CSRM FED)
Sent: Friday, March 22, 2019 9:36 PM
To: Tommy Wright (CENSUS/CSRM FED)
Cc: Martin Klein (CENSUS/CSRM FED)
Subject: Re: Request to Review a Decennial Proposed Evaluation

Good evening Tommy,

Please, I have attached here with the summary of notes for including the Citizenship question on the 2020 Decennial Census. This is a major issue that can affect the overall 2020 Decennial Census and can have a long term effect on the credibility of how the U.S. Census Bureau conducts the 2020 Decennial Census and future censuses. The U.S. Census Bureau is an independent government statistical agency that always seek to conduct surveys, censuses and produce good reports.
The issue of including the citizenship question to the 2020 Decennial Census will need a major field test similar to the 2016 test that the agency conducted in Harris County, Texas and Los Angeles County, California in preparation for the 2020 Decennial Census in order to assess the severe impacts that the citizenship question included in the 2020 Decennial Census can have on the agency ability to conduct independent surveys and censuses.

The study plan proposal is a good first step to provide what needs to be done to address the major problems that will be associated with including the citizenship question on the 2020 Decennial Census. Although this is a good study plan but it does not adequately address the cost and significant impact on the data quality that will be associated with including the citizenship question on the 2020 Decennial Census. (b) (5) [redacted]

AMERICAN OVERSIGHT

Thank you.
Sincerely,

Isaac Dompreh,
Research Mathematical Statistician
Statistical Computing Area
Center for Statistical Research and Methodology (CSRM)
Associate Directorate for Research and Methodology (ADRM)
U.S. Census Bureau, Department of Commerce
isaac.dompreh@census.gov
(301)763-6801

From: Tommy Wright (CENSUS/CSRM FED)
Sent: Tuesday, March 19, 2019 8:30:57 PM
To: Isaac Dompreh (CENSUS/CSRM FED)
Cc: Martin Klein (CENSUS/CSRM FED)
Subject: Request to Review a Decennial Proposed Evaluation

Dear Isaac,

Please review and provide any comments to me by COB Friday 22, 2019.

Sincerely,

Tommy

AMERICAN OVERSIGHT

From:	Kimberly Sellers
To:	Andrew Raim (CENSUS/CSRM FED)
Cc:	Tommy Wright (CENSUS/CSRM FED); Thomas Mathew (CENSUS/CSRM FED)
Subject:	Re: Summary statements (CSM 2020 Research and Experiments)
Date:	Wednesday, August 08, 2018 12:17:10 PM

10am tomorrow (or anytime tomorrow before 1pm, recognizing your and Thomas's restriction) works for me. --Kim

On Wed, Aug 8, 2018 at 12:13 PM, Andrew Raim (CENSUS/CSRM FED) <andrew.raim@census.gov> wrote:

> Hi all,
>
> (b) (5) [redacted]
>
> Andrew

From: Tommy Wright (CENSUS/CSRM FED)
Sent: Wednesday, August 8, 2018 9:16:07 AM
To: Andrew Raim (CENSUS/CSRM FED); Thomas Mathew (CENSUS/CSRM FED); Kimberly Sellers
Subject: Fw: Summary statements (CSM 2020 Research and Experiments)

Dear Andrew, Thomas, and Kim,

Please take a look at the 5 requests for help below from folks in CSM relating to 2020 Experiments.

We should get together soon among ourselves to discuss how we might proceed.

Sincerely,

Tommy

From: Tommy Wright (CENSUS/CSRM FED)
Sent: Thursday, August 2, 2018 9:01 AM
To: Misty L Heggeness (CENSUS/ADRM FED)
Cc: Tommy Wright (CENSUS/CSRM FED)
Subject: Fw: Summary statements (CSM 2020 REX

Thanks, misty.

AMERICAN OVERSIGHT

Is Renee Ellis (CSM) the main contact?

Also, is there someone from DSSD working on this as well?

Sincerely,

Tommy

From: Misty L Heggeness (CENSUS/ADRM FED)
Sent: Wednesday, August 1, 2018 9:35 AM
To: Tommy Wright (CENSUS/CSRM FED)
Subject: Fw: Summary statements

Hi Tommy,

Following up with you. Attached and below are the 2020 CPEX projects that need assistance with power calculations and sample designs. Please let me know who from your area is available to assist. Thanks so much!

Misty

From: Renee Ellis (CENSUS/CSM FED)
Sent: Thursday, July 26, 2018 5:21 PM
To: Misty L Heggeness (CENSUS/ADRM FED)
Cc: Joanne Pascale (CENSUS/CSM FED)
Subject: Re: Summary statements

I did not hear back from everyone but here are the summaries I did for decennial for all projects except the experiment. Attached is the experiment write up. I will catch back up with you when I get back from JSM.

Subgroup 1

(b) (5) [redacted]

AMERICAN OVERSIGHT

(b) (5)

Project 1A

Observations with follow up interviews

(b) (5)

Project 1B

Interviews with community partners

(b) (5)

Project 1C

Race/Ethnicity follow up interviews

AMERICAN OVERSIGHT

(b) (5)

[redacted]

Project 1D

Language and mode re-interviews

(b) (5)

[redacted]

Project 1E

Training experiment- see attached

Renee Ellis, PhD

Center for Survey Measurement

U.S. Census Bureau

AMERICAN OVERSIGHT

301-763-5122

--
Kimberly F. Sellers, PhD
Associate Professor of Statistics
Department of Mathematics and Statistics
Georgetown University
306 St. Mary's Hall
Washington, DC 20057
Phone: 202-687-8829
Fax: 202-687-6067
Email: kfs7@(b) (6)
Web: faculty.georgetown.edu/kfs7

AMERICAN OVERSIGHT

From: Tommy Wright (CENSUS/CSRM FED)
To: Thomas Mathew (CENSUS/CSRM FED); Kimberly Sellers; Andrew Raim (CENSUS/CSRM FED)
Subject: Re: Summary statements (CSM 2020 Research and Experiments)
Date: Wednesday, August 08, 2018 1:38:10 PM

Thanks, Andrew.

(b) (5) [redacted]

Sincerely,

Tommy

From: Thomas Mathew (CENSUS/CSRM FED)
Sent: Wednesday, August 8, 2018 1:33:46 PM
To: Kimberly Sellers; Andrew Raim (CENSUS/CSRM FED)
Cc: Tommy Wright (CENSUS/CSRM FED)
Subject: Re: Summary statements (CSM 2020 Research and Experiments)

10 AM is good for me -- Thomas

From: Kimberly Sellers <Kimberly.Sellers(b) (6) [redacted]
Sent: Wednesday, August 8, 2018 12:16:52 PM
To: Andrew Raim (CENSUS/CSRM FED)
Cc: Tommy Wright (CENSUS/CSRM FED); Thomas Mathew (CENSUS/CSRM FED)
Subject: Re: Summary statements (CSM 2020 Research and Experiments)

10am tomorrow (or anytime tomorrow before 1pm, recognizing your
and Thomas's restriction) works for me. --Kim

On Wed, Aug 8, 2018 at 12:13 PM, Andrew Raim (CENSUS/CSRM FED)
<andrew.raim@census.gov> wrote:

> Hi all,
>
> (b) (5) [redacted]
>
> Andrew
>
> ---
>
> **From:** Tommy Wright (CENSUS/CSRM FED)
> **Sent:** Wednesday, August 8, 2018 9:16:07 AM
> **To:** Andrew Raim (CENSUS/CSRM FED); Thomas Mathew (CENSUS/CSRM FED); Kimberly Sellers

AMERICAN OVERSIGHT

Subject: Fw: Summary statements (CSM 2020 Research and Experiments)

Dear Andrew, Thomas, and Kim,

Please take a look at the 5 requests for help below from folks in CSM relating to 2020 Experiments.

We should get together soon among ourselves to discuss how we might proceed.

Sincerely,

Tommy

From: Tommy Wright (CENSUS/CSRM FED)
Sent: Thursday, August 2, 2018 9:01 AM
To: Misty L Heggeness (CENSUS/ADRM FED)
Cc: Tommy Wright (CENSUS/CSRM FED)
Subject: Fw: Summary statements (CSM 2020 REX

Thanks, misty.

Is Renee Ellis (CSM) the main contact?

Also, is there someone from DSSD working on this as well?

Sincerely,

Tommy

From: Misty L Heggeness (CENSUS/ADRM FED)
Sent: Wednesday, August 1, 2018 9:35 AM
To: Tommy Wright (CENSUS/CSRM FED)
Subject: Fw: Summary statements

Hi Tommy,

Following up with you. Attached and below are the 2020 CPEX projects that need assistance with power calculations and sample designs. Please let me know who from your area is available to assist. Thanks so much!

AMERICAN OVERSIGHT

Misty

From: Renee Ellis (CENSUS/CSM FED)
Sent: Thursday, July 26, 2018 5:21 PM
To: Misty L Heggeness (CENSUS/ADRM FED)
Cc: Joanne Pascale (CENSUS/CSM FED)
Subject: Re: Summary statements

I did not hear back from everyone but here are the summaries I did for decennial for all projects except the experiment. Attached is the experiment write up. I will catch back up with you when I get back from JSM.

Subgroup 1

(b) (5)

[redacted]

Project 1A

Observations with follow up interviews

(b) (5)

[redacted]

Project 1B

Interviews with community partners

AMERICAN OVERSIGHT

1 (b) (5) [redacted]

Project 1C

Race/Ethnicity follow up interviews

(b) (5) [redacted]

Project 1D

Language and mode re-interviews

(b) (5) [redacted]

Project 1E

Training experiment- see attached

AMERICAN OVERSIGHT

Renee Ellis, PhD
Center for Survey Measurement
U.S. Census Bureau
301-763-5122

--
Kimberly F. Sellers, PhD
Associate Professor of Statistics
Department of Mathematics and Statistics
Georgetown University
306 St. Mary's Hall
Washington, DC 20057
Phone: 202-687-8829
Fax: 202-687-6067
Email: kfs7@(b) (6)
Web: faculty.georgetown.edu/kfs7

AMERICAN OVERSIGHT

From: Misty L Heggeness (CENSUS/ADRM FED)
To: Tommy Wright (CENSUS/CSRM FED)
Cc: Renee Ellis (CENSUS/CSM FED)
Subject: Re: Summary statements (CSM 2020 REX
Date: Thursday, August 02, 2018 9:05:58 AM

Hi Tommy,

Yes, I would use Renee as the main contact (ccing her here to close the loop). Not sure if anyone from DSSD is involved, but Renee did mention they might have also found some alternative resources to help out.

Misty

Misty L. Heggeness, PhD, MPP, MSW
Senior Advisor for Evaluations & Experiments
Research and Methodology
US Census Bureau

Office 301.763.7251
Cell (b) (6) [redacted]
misty.l.heggeness@census.gov

On Aug 2, 2018, at 9:01 AM, Tommy Wright (CENSUS/CSRM FED) <Tommy.Wright@census.gov> wrote:

> Thanks, misty.
>
> Is Renee Ellis (CSM) the main contact?
>
> Also, is there someone from DSSD working on this as well?
>
> Sincerely,
>
> Tommy

From: Misty L Heggeness (CENSUS/ADRM FED)
Sent: Wednesday, August 1, 2018 9:35 AM
To: Tommy Wright (CENSUS/CSRM FED)
Subject: Fw: Summary statements

Hi Tommy,

Following up with you. Attached and below are the 2020 CPEX projects that need assistance with power calculations and sample designs. Please let me

AMERICAN OVERSIGHT

know who from your area is available to assist. Thanks so much!

Misty

From: Renee Ellis (CENSUS/CSM FED)
Sent: Thursday, July 26, 2018 5:21 PM
To: Misty L Heggeness (CENSUS/ADRM FED)
Cc: Joanne Pascale (CENSUS/CSM FED)
Subject: Re: Summary statements

I did not hear back from everyone but here are the summaries I did for decennial for all projects except the experiment. Attached is the experiment write up. I will catch back up with you when I get back from JSM.

Subgroup 1

(b) (5)

[redacted]

Project 1A

Observations with follow up interviews

(b) (5)

[redacted]

AMERICAN OVERSIGHT

(b) (5) [redacted]

Project 1B

Interviews with community partners

1 (b) (5) [redacted]

Project 1C

Race/Ethnicity follow up interviews

(b) (5) [redacted]

AMERICAN OVERSIGHT

(b) (5) .

Project 1D

Language and mode re-interviews

(b) (5)

Project 1E

Training experiment- see attached

Renee Ellis, PhD

Center for Survey Measurement

U.S. Census Bureau

301-763-5122

<Training Experiment Short Write-Up for power analysis-1.docx>

AMERICAN OVERSIGHT

From: Isaac Dompreh (CENSUS/CSRM FED)
To: Tommy Wright (CENSUS/CSRM FED)
Subject: Re: Supreme Court to hear citizenship question to 2020 Census
Date: Friday, November 16, 2018 2:51:35 PM

You are welcome Tommy.

Isaac Dompreh,
Research Mathematical Statistician
Statistical Computing Area
Center for Statistical Research and Methodology (CSRM)
Associate Directorate for Research and Methodology (ADRM)
U.S. Census Bureau, Department of Commerce
isaac.dompreh@census.gov
(301)763-6801

From: Tommy Wright (CENSUS/CSRM FED)
Sent: Friday, November 16, 2018 2:44:03 PM
To: Isaac Dompreh (CENSUS/CSRM FED)
Cc: Martin Klein (CENSUS/CSRM FED); CSRM All Staff List
Subject: Supreme Court to hear citizenship question to 2020 Census

Thanks for sharing, Isaac.

Sincerely,

Tommy

From: Isaac Dompreh (CENSUS/CSRM FED)
Sent: Friday, November 16, 2018 2:40 PM
To: Tommy Wright (CENSUS/CSRM FED)
Cc: Martin Klein (CENSUS/CSRM FED)
Subject: Supreme Court to hear citizenship question to 2020 Census

https://www.usatoday.com/story/news/politics/2018/11/16/census-2020-supreme-court-hear-case-adding-citizenship-question/2026725002/

Supreme Court to hear case on Trump administration plan to add citizenship question to 2020 Census

AMERICAN OVERSIGHT

www.usatoday.com

The Supreme Court agreed Friday to weigh in on the dispute over the Trump administration's plan to add a question about citizenship to the 2020 Census.

Isaac Dompreh,
Research Mathematical Statistician
Statistical Computing Area
Center for Statistical Research and Methodology (CSRM)
Associate Directorate for Research and Methodology (ADRM)
U.S. Census Bureau, Department of Commerce
isaac.dompreh@census.gov
(301)763-6801

AMERICAN OVERSIGHT

From: Michael C Cook (CENSUS/PIO FED)
To: Tommy Wright (CENSUS/CSRM FED)
Subject: Re: U.S. Census Bureau Daily News - Monday, August 3, 2020
Date: Monday, August 03, 2020 10:55:24 AM

Thanks, Tommy.

Michael C. Cook Sr., Division Chief
Public Information Office
U.S. Census Bureau
O: 301-763-4083 | M: (b) (6) [redacted]
census.gov | @uscensusbureau

> On Aug 3, 2020, at 10:50 AM, Tommy Wright (CENSUS/CSRM FED) <Tommy.Wright@census.gov> wrote:
>
> Hang in there, Michael.
>
> -Tommy
>
> ---
>
> **From:** U.S. Census Bureau <census@subscriptions.census.gov>
> **Sent:** Monday, August 3, 2020 10:30 AM
> **To:** Tommy Wright (CENSUS/CSRM FED) <Tommy.Wright@census.gov>
> **Subject:** U.S. Census Bureau Daily News - Monday, August 3, 2020

AMERICAN OVERSIGHT

Click Here

2020 Census in the News

Summary

Spectrum News in New York reported that the Census Bureau's "push week" has been responsible for an increase in the response rate in the city. The Associated Press, The Washington Post, The Hill, Newser, Staten Island Advance, and MassLive reported on potential changes to the operational timeline for the 2020 Census, focusing on the nonresponse follow-up operation and the deadline for the delivery of apportionment counts to the President and Congress. The Chicago Sun-Times Editorial Board published a piece on the same topic. The Washington Post article quoted Michael Cook who said the Census Bureau is still evaluating operations and will make an announcement when plans are final.

National & Top-Tier News

View today's national broadcast report.

Trump's push to spoil the census — and make Democrats disappear

The Washington Post – Editorial Board, August 2

President Trump cannot make the coronavirus disappear by curtailing testing, despite his

photo

2020 Census Spotlight

The Chicago Tribune Editorial Board encouraged readers to respond to the 2020 Census, writing that a visit from census workers might occur during a "cliffhanger moment during your favorite Netflix series" for those that don't respond.

Census Bureau Spokespeople in the News

Cleveland's ABC affiliate (WEWS-TV) interviewed Michael Cook for an article about how response rates in the city are below the national average. North Carolina's The Daily Reflector quoted Marilyn Stephens who encouraged Greenville residents concerned about interacting with

AMERICAN OVERSIGHT

bizarre suggestions otherwise. But he can make Democrats disappear, politically speaking, by spoiling the decennial census — the all-important and heretofore nonpartisan tally of the U.S. population that determines which states get how much political representation and where billions in federal money flow. The Supreme Court blocked his first effort to skew the count.

With time extension stalled, Census speeds up count schedule

The Associated Press – Mike Schneider, July 31

The U.S. Census Bureau sped up the timetable for crunching 2020 census numbers on Friday after an earlier request for an extension stalled in the Senate and as pressure mounts to turn in data used to determine congressional districts by year's end, when President Donald Trump is still in office.

Census Bureau could halt count a month earlier than planned, officials say

The Washington Post – Fredrick Kunkle and Tara Bahrampour, July 31

Census Bureau officials appear to be moving toward wrapping up the process of counting all inhabitants of the United States a month earlier than planned as a result of direction from the Trump administration and Congress' failure to agree on an extension, current and former bureau officials said.

Native Americans Feel Devastated by the Virus Yet Overlooked in the Data

The New York Times – Kate Conger, Robert Gebeloff and Richard A. Oppel Jr., July 31

census workers to respond online, by phone, and by mail. Baltimore's CBS affiliate (WJZ-TV) reported on a statement released by Gov. Hogan who provided an update on Maryland's response rates and encouraged residents to 'fulfil their civic duty' and respond to the census. Kentucky's Owensboro Messenger reported that the state surpassed its final response rate for the 2010 Census, quoting a media specialist who explained that Owensboro is also "on its way" to surpassing its 2010 total. New York City's Gothamist quoted Jeff Behler who provided an analogy of a school, saying that if 20 percent of the students don't respond, the school will only get "80% of the funding it deserves" and this will affect all students "because they have to deal with less funding."

AMERICAN OVERSIGHT

Statistical gaps can make it difficult to properly allocate public resources to Native Americans. When that's the case, one leader said, "tribal nations have an effective death sentence." As the coronavirus outbreak in Washington State's Yakima County worsened last month, Tashina Nunez recognized more and more of the patients who arrived in her hospital.

Census Data in the News

12 People in a 3-Bedroom House, Then the Virus Entered the Equation New York Times

U.S. economy contracted at fastest quarterly rate on record from April to June as coronavirus walloped workers, businesses Washington Post

As vaccines move into phase 3 trials, diversity must be at top of agenda ABC News Online

Regional 2020 Census News

Atlanta Region

View today's broadcast report for the Atlanta Region.

U.S. Census will soon begin home visits

The Daily Reflector [NC] – Ginger Livingstone, August 2

U.S. Census workers will start home visits Aug. 11 to ensure all Americans are counted in the second census of the 21st Century.

Outside voter signup, Census drive set Saturday in Huntsville

AL.com [AL] – Lee Roop, July 31

More than a dozen organizations active in Huntsville's Black community plan a socially distanced outdoor event Saturday to register

Beltway & Other Online News

Puerto Rico and the Census: Our Campaign to Address Anti-Black Racism
Teen Vogue – Gloriann Sacha Antonetty & Alexandra-Marie Figueroa Miranda, August 3

In Puerto Rico, our "Island of Enchantment," you rarely see dark-skinned girls onscreen. You don't really see them in ads or in novelas, but on the off chance, you might see one on the local news every once in a while.

Experts cast doubt on Trump census order: 'It's not possible to do it accurately'

The Washington Times – Stephen Dinan, August 2

The man who designed the method Homeland Security uses to estimate the number of illegal immigrants says there's just too much margin for error to use

AMERICAN OVERSIGHT

voters and complete Census 2020 forms. All are welcome at the event at 4710 University Drive Plaza from 11 a.m. to 3 p.m., organizers say. Volunteers will help residents verify voter registration material and do their Census forms. Masks are required.

Huntsville coalition members hosting event to engage voter and census participation in the city

WHNT-TV [AL] - Staff, July 31

The Coalition For Justice Through Civic Engagement and coalition members Lift Our Vote and No More Dirty, Inc. are sponsoring an event to help Huntsville community members verify voter registration material and complete forms for the 2020 Census.

Augusta census participation lags

The Augusta Chronicle [GA] – Susan McCord, July 31

Augusta residents continue to trail the national average in responding to the 2020 Census. As of July 29, 56.5% of Augusta-Richmond County households had replied since the surveys went out in March. The national average was 62.8%, and the state average was 58.6%.

Chicago Region

View today's broadcast report for the Chicago Region.

Bella Vista leads state's cities in census response

Arkansas Democrat Gazette [AR] – Doug Thompson, August 3

Bella Vista has the highest response rate to the

it to carry out President Trump's new executive order to strip illegal immigrants out of the census count used to apportion congressional seats.

Census to end counting efforts a month early: report

The Hill – Mary Johnson, July 31

The Census Bureau has decided to cut the amount of time that it will spend knocking on doors across the country by a month, NPR reports. In April, the agency indicated that it would need until Halloween to accurately count all of the people in the country due to delays incurred by coronavirus pandemic.

Trump Admin Moves To Speed Up 2020 Census Count, Raising Alarms About Accuracy

Talking Points Memo – Tierney Sneed, July 31

The Census Bureau is preparing to wind down certain decennial census operations a month

AMERICAN OVERSIGHT

U.S. Census of any city in Arkansas, the most recent federal figures show. Both Benton and Washington counties have rates above the state and national averages, the figures show. The federal Census Bureau posts a self-response rate based on the number of households in a town, county or state. The rate is the percentage of those dwellings where someone has responded to the census survey.

Editorial: Preserve your serenity. Fill our your census form.

Chicago Tribune – Editorial Board, August 2

But if you want to keep annoying intruders off your lawn and porch, here's some advice: Fill out your census form ASAP. Otherwise, you can expect a personal visit from someone dispatched by the federal government to find out who's living in your home. And it may come at a cliffhanger moment during your favorite Netflix series. The Census Bureau mailed reminder cards in July, and don't think you can get away with tossing them.

Trump's damaging attack on the census

Minneapolis Star-Tribune [MN] – Editorial Board, August 2

President Donald Trump's attempts to manipulate the census have taken an even more disturbing turn. Thwarted by the courts in an earlier move to add a citizenship question, Trump now is making a last-ditch effort to exclude undocumented immigrants from the count outright.

#BeCounted in the 2020 Census

Wisconsin Gazette [WI] – Staff Writer, August 2

earlier than planned, NPR reported Thursday, amid growing signs that the White House is pushing for a rushed count at the risk of undermining the decennial census' accuracy.

Census Cuts Itself Short, Many Fear 'Massive Undercount'

Newser – Jenn Gidman, July 31

About 40% of US homes haven't responded to census questionnaires for this year's mandated count, so the Census Bureau has started sending out door knockers. But those efforts may be cut short, amid an apparent push by the bureau to wrap things up much earlier than expected—a move that congressional Democrats fear is due to pressure from the White House.

AMERICAN OVERSIGHT

The NAACP wants you to #BeCounted. It's your chance to be a hero! Join activists from across America, and make your voice heard! You'll help make sure your family and community are represented for the next 10 years.

Opinion: Kenosha's 'Be Counted 2020 Census Week'

Kenosha News [WI] – Katherine Marks, August 2

The 2020 Census Complete Count Committees for the City of Kenosha and Kenosha County will launch Kenosha's "Be Counted 2020 Census Week" during August 16–22.

Trump memo boosts census fears among undocumented residents

Chicago Sun-Times [IL] – Manny Ramos, July 31

This past week, the census workers spent a day knocking on doors in Chicago and Cook County. Thursday's one-day test sets the stage for when door-knockers return in force, everywhere, starting Aug. 11.

Democracy is under siege by efforts to keep you from being counted in the Census

Chicago Sun-Times [IL] – Editorial Board, July 31

In normal times, the Census Bureau might be entirely capable of counting every person living in the United States, fully and accurately, and presenting the final tally to the president by the last day of the year, as required by law.

Census 2020 extends deadline

Areawide Media [MO] - Renee Janes, July 31

Census 2020 marks the 24th time since 1790 the United States has counted its population and the data collected is used to determine

AMERICAN OVERSIGHT

how federal funding is spent, voting district boundaries and Congressional seats for each state. Due to COVID-19, the timeline for the census has been changed including household visits for those that have not responded will being Aug. 11 and responses may be made by mail, phone or online through Oct. 31.

Denver Region

View today's broadcast report for the Denver Region.

Opinion: Census 2020: Now is not the time to be complacent in filling out data

Abilene Reporter News [TX] – Jay Hardaway, August 2

In my talks, columns, social media posts, random conversations with people, etc., I often cite apathy as our greatest enemy. I think I am being unfair. A better word is complacency.

2020 Census Campaign visits San Antonio's West Side

KSAT-TV [TX] – Alicia Barrera and Steven Chavez, August 1

The 2020 Census campaign, along with the League of United Latin American Citizens, city and county leaders led a caravan of cars through San Antonio's West Side on Saturday morning to increase community participation in the census. City Census Administrator Berta Rodriguez said less than 50% of the population has responded to the census.

EDITORIAL: Who counts: Valley, state big losers under census command

The Brownsville Herald [TX] – Staff Writer, July

AMERICAN OVERSIGHT

President Trump last week ordered the director of the U.S. Census Bureau to subtract undocumented immigrants from the 2020 enumeration. Doing so would significantly affect the Rio Grande Valley, the state of Texas and other areas where immigrants are a large part of the population. It would weaken our voice in Congress.

Los Angeles Region

View today's broadcast report for the Los Angeles Region.

East LA District Has State's Lowest Census Response Rates

Spectrum News 1 [CA] – Catalina Villegas, August 2

Edeny Casey is working with the nonprofit, We Count LA, to help Boyle Heights residents fill out the 2020 census. She's been doing outreach for campaigns for half a decade, so by now she knows, it's a numbers game: "If you get lucky you'll get a house here or there. So that's why the more houses we hit, the more opportunities we have to fill the census," said Casey.

Living On A Razor's Edge During The Pandemic, Community Clinics Are Urging Census Turnout

LAist [CA] – Caitlin Hernandez, July 31

It's hard to miss the pop-up canopy outside the AltaMed clinic in East L.A. It's an outdoor waiting space where patients often line up. With a large banner reminding folks to get counted in the 2020 Census, it doubles as an active place for civic engagement.

AMERICAN OVERSIGHT

San Mateo County's Census Response Rate Leads State

Patch [CA] – Gideon Rubin, July 31

San Mateo County is being counted at a rate like no other in the state. As of Wednesday, San Mateo County led the state with a 73.9 percent self-response rate, the county announced in a news release Friday.

Editorial: California has a lot riding on the Census

Orange County Register [CA] – Editorial Board, July 31

The 2020 Census has challenges, especially in California. In March 2019, Public Policy Institute of California estimated that about three-quarters of California's population belong to one or more groups that the Census has historically undercounted. These include renters, young men, children, African Americans, Latinos and people who live in nonstandard housing.

Monterey County joins lawsuit against President Trump

Salinas Californian [CA] – Angelica Cabral, July 31

Monterey County joined a growing list of governmental bodies suing President Donald Trump for his attempt to leave undocumented immigrants out of congressional apportionment. Although the 2020 Census is meant to include all people, including those who are living in the United States without papers or who are not citizens, Trump said they shouldn't be counted when determining

AMERICAN OVERSIGHT

congressional seats.

County Leads State In Census Response

Bay City News Service [CA] – Staff Writer, July 31

As of Wednesday, San Mateo County had the highest census self-response rate in California at 73.9 percent, officials said Friday. The county's response rate exceeds the national rate of 62.8 percent and the California rate of 64 percent, according to the San Mateo County Office of Community Affairs.

New York Region

View today's broadcast report for the New York Region.

'We need our community to step up': Advocates push for New Yorkers to fill out census

WPIX-TV [NY] – Cristian Benavides, August 3

Advocates and elected officials in New York pushed Sunday for residents to fill out the census after the Census Bureau sped up the timetable on its website for crunching 2020 census numbers.

NYC Census Response Rate Continues To Lag As City Grapples With Pandemic Fears And Reduced Door-Knocking

Gothamist [NY] – Megan Zerez, August 2

Despite the potential loss of millions of dollars in federal aid that would result from an undercount in the 2020 U.S. Census, there's been an alarming lack of participation by New Yorkers, for a myriad of reasons. This follows a national trend, though New York's participation average remains far lower.

AMERICAN OVERSIGHT

[Increase in Self-Responses for Syracuse Census Push Week]

Spectrum News [NY] – Staff Writer, August 2

There are more encouraging census numbers for the city of Syracuse, but there is still more to be done. Thanks in part to Census Push Week, the city saw the self-response rate jump to 50.1 percent. That's in line, if not above, most cities across the state.

[Editorial: There's a lot at stake with the census]

The Daily Gazette [NY] – Editorial Board, August 2

Ever play the game, “Hungry Hungry Hippos” when you were a kid? You roll a bunch of marbles around a bowl in the middle, and each kid frantically pounds on the tail of his or her hippo trying to gobble up as many marbles as they can. The one who gets the most marbles wins. That’s how the census game is played.

[Door-to-door census visits in NY state begin Aug. 6]

Daily Freeman [NY] – Patricia Doxsey, August 1

Thousands of people are set to hit the streets in the coming week as the U.S. Census Bureau begins its door-to-door effort to collect data from households that didn't respond to the 2020 Census. "They're going to go to every address that hasn't responded yet," Behler said.

[Federal Workers Pushing To Get Granite Staters To Fill Out Census]

NHPR [NH] – Rick Ganley and Sarah Gibson, July 31

Federal workers and local volunteers are trying

AMERICAN OVERSIGHT

to get as many people as possible in New Hampshire to fill out to 2020 U.S. census. Time is running out for the first part of that process, which is focused on getting people to fill out the survey themselves before a census worker shows up at their door in August.

Why New York City's Census Director Says Ending Door Knocking Early Will Be "Disastrous"

WNYC-FM [NY] – Staff Writer, July 31

The Trump Administration has decided to shorten the deadline for the Census count by one month. That means door-knocking efforts are now slated to stop by September 30th.

Governor Cuomo Asks Residents For Census Help As Responses Stagnate

The Evening Sun [NY]— Zachary Meseck, July 31

Governor Andrew Cuomo is asking that New York State residents reach out to 10 people and remind them to fill out their census, as census week comes to an end and areas like Chenango County fall behind in response rates. According to Chenango County Planning Department Director Shane Butler, as of Wednesday, Chenango's response rate has fallen to the 41st ranked county out of the 62 counties in New York State. Butler said Chenango County is at approximately 54 percent for overall response for the census, and that the area could miss out on vital funding if that number doesn't increase.

Census Workers Begin Door-To-Door Count In Massachusetts

WBZ-TV [MA] – Staff Writer, July 31

Massachusetts residents who haven't responded to the 2020 U.S. Census yet may be

AMERICAN OVERSIGHT

getting a knock on their door soon. Census workers started their door-to-door visits Thursday across much of the state. The door-knocking has started in Berkshire, Hampshire, Franklin, Hampden, Worcester Norfolk and Middlesex Counties. The on-the-ground effort will come to the rest of Massachusetts in mid-August.

Door-To-Door Census Count Begins In Massachusetts As Trump Moves To Stop In-Person Count Early

WAMC-FM [NY]— Paul Tuthill, July 31

People in Massachusetts who have not yet responded to the 2020 U.S. Census could soon get a knock on their door. A third of Massachusetts households have not responded to the census, so they will get a visit from a census-taker as the final push begins to count all of the state's 6.8 million residents. " This is crunch time," said Secretary of the Commonwealth William Galvin, the state's top census official, who visited Springfield Thursday for the kickoff of the door-to-door headcount and the start of the final 10 weeks of the 2020 U.S. Census.

Report: Door knocking for Census to end one month earlier than expected

SI Live [NY] – Erik Bascome, July 31

The Census Bureau is reducing the amount of time it will spend door knocking, raising concerns of a potential undercount, according to a new report. On Thursday, NPR reported that door knocking and in-person interviews for the 2020 Census, originally scheduled to run through Oct. 31, will now end a month earlier,

AMERICAN OVERSIGHT

on Sept. 30.

Philadelphia Region

View today's broadcast report for the Philadelphia Region.

Harford County above state, U.S. average in census response; door-to-door count begins Aug. 11

The Aegis [MD] – James Whitlow, August 3

The messaging has been all around Harford County — social media blasts, smiling faces on billboards and workers standing at meal distribution sites — all representing the decennial census as one of the most important and simple things Harford County residents can do.

Opinion: Census will show it's time to redraw Carroll County districts

Carroll County Times [MD] – Christopher Tomlinson, August 3

With the 2020 United States Census underway, Carroll County wants to ensure that every resident is counted. Not only does the data obtained by the Census help the federal government allocate $675 billion to local governments, but the information gathered helps the Maryland General Assembly and Carroll's Board of County Commissioners assess whether congressional, state legislative and commissioner district lines need to be redrawn.

Census Week of Action kicks off in Dauphin County

WHTM-TV [PA] – Karla Urland, August 3

Census Week of Action kicks off today in

AMERICAN OVERSIGHT

Dauphin County. The 2020 Census deadline is October 31 and Dauphin County leaders say a lot is riding on the completion of those forms.

New data released on 2020 Census response rates

WPMT-TV [PA] – Harri Leigh, August 2

The countdown is on to complete the 2020 Census, but many Pennsylvanians still haven't been counted. Only 65.9 percent of Pennsylvania households have filled out the Census. Though higher than the national average of 62.8 percent, county officials are working to raise that number despite challenges presented by the pandemic.

Opinion: Don't count out Cleveland neighborhoods in this year's census:

Cleveland Plain-Dealer [OH] – Emily Campbell, August 2

Ensuring that Cleveland's neighborhoods get all the resources they deserve requires a complete count in the U.S. Census. But after three months of self-responding, Cleveland is behind. Particularly concerning, response rates mirror all-too-familiar geographic patterns in which communities of color are left out. A complete census count would give us the opportunity to undo some of the racial inequity issues of the past -- but only if everyone is counted.

Cleveland, other major cities fall below national census completion rate; officials urge participation

WEWS-TV [OH] – Jade Jarvis, August 2

New data from the U.S. Census Bureau shows Cleveland's self-response rates for the 2020

AMERICAN OVERSIGHT

census have fallen far behind the national average. The agency said nationwide the self-response rate for the census is 62.1%. Ohio's rate surpasses the national rate at 66.6%.

Baltimore City lagging behind rest of the state & country when it comes to 2020 census

WBBF-TV [MD] – Micarie Kemp, August 2

New data shows Baltimore City is lagging behind the rest of the state and country when it comes to filling out the 2020 census. Filling out the census is beneficial for everyone because it helps bring federal funding to your community. Across Baltimore City, nearly half of residents still have not filled out their census.

Census countdown is on, but a lot of Pennsylvanians haven't been counted

The Patriot-News [PA] – Jordan Wolman, July 31

Even as Pennsylvania's census response rate ticks 3 percentage points above the national rate of 62.8%, many counties across the Keystone State are lagging way behind. As of Thursday, the U.S. Census Bureau reports less than a third of Forest and Sullivan counties' residents have responded while counties like Chester, Franklin and Lancaster are seeing response rates near 70 or 75%. In the Capital region, Dauphin and Cumberland counties are seeing response rates better than the state's 65.8% average.

Census Takers Begin Visits For Unfinished 2020 Census In Vienna

Patch [VA] – Emily Leayman, July 31

Census takers are following up at Vienna households that have not completed the 2020

AMERICAN OVERSIGHT

U.S. Census starting on Friday. Census takers are visiting homes to ensure all residents are counted in the 2020 Census. Households began receiving invitations in the spring to complete the Census online, by phone or by mail.

Hamilton County Residents Urged To Complete The 2020 Census

The Pulse [TN]— Staff Writer, July 31

Hamilton County residents are being urged to complete the 2020 Census so the area does not miss out on federal funding. The county's self-response rate of 63.3% (as of 7/22) shows that many still need to complete their census.

California sues Trump over omitting undocumented immigrants from census apportionment count

Jurist [PA] – Erin Napoleon, July 31

California has sued US President Donald Trump over his order prohibiting undocumented immigrants from being included in Census apportionment counts. The complaint, filed Tuesday, argues that Trump's order disturbs and undermines the historical precedent of the US counting "all of its residents, including for the purpose of apportioning the U.S. House of representatives, regardless of residents' citizenship or immigration status.

Governor Hogan On 2020 Census: 'I Urge Every Single Maryland Resident To Fulfill Their Civic Duty And Help Shape Our Future'

WJZ-TV [MD]— Staff Writer, July 31

Governor Larry Hogan provided an update on the state's progress in the 2020 United State Census on Friday. Maryland ranks 13th among

AMERICAN OVERSIGHT

the 50 states with a response rate of 66.7%, which is close to four points above the national average of 62.8%. The state ranks fifth in Internet response and Carroll County leads the state in response rate at 78.4% which ranks 25th of the 3,200 United States counties.

Earlier census deadline could cause W.Pa. officials to accelerate counts

TribLive [PA] – Megan Tomasic, July 31

In an unprecedented move, leaders with the Census Bureau are cutting short in-person counting efforts for the 2020 census, efforts that largely impact hard-to-count populations. The decision, reported by NPR, moves the deadline for in-person census surveys from Oct. 31 to Sept. 30, potentially leaving some communities with uncounted residents — often those who are disproportionately poor, young or people of color.

About Census Daily News Digest

Census media monitoring is a daily compendium of articles about the Census Bureau and a representative sampling of the most important and relevant news coverage and commentary. Opinions expressed above do not belong to the Census Bureau, or its staff. English translations, in summary form, have been provided for all in-language articles included in this report.

This is an official email from the U.S. Census Bureau. If you have any questions or comments, please contact us (http://www.census.gov/about/contact-us.html).

AMERICAN OVERSIGHT

From: John Maron Abowd (CENSUS/ADRM FED)
To: (b) (6)
Cc: Ali Mohammad Ahmad (CENSUS/ADCOM FED); Michael C Cook (CENSUS/PIO FED)
Subject: SCOTUS ruling
Date: Thursday, June 27, 2019 12:06:36 PM

Please continue to refer all inquiries about the citizenship question to the Public Information Office.

The current public statement is that "The decision is currently being reviewed."

Thanks,

John M. Abowd, PhD, Associate Director and Chief Scientist
Research and Methodology
U.S. Census Bureau
O: 301-763-5880 (simulring on cell)
census.gov | @uscensusbureau

AMERICAN OVERSIGHT

From: Tommy Wright (CENSUS/CSRM FED)
To: (b) (6)
Subject: SPECIAL: Action Items from OpCom
Date: Tuesday, June 05, 2018 11:57:37 PM

From: John Maron Abowd (CENSUS/ADRM FED)
Sent: Tuesday, June 5, 2018 5:11 PM
To: (b) (6); Lisa B Stewart (CENSUS/ADRM FED); (b) (6)
Cc: John L Eltinge (CENSUS/ADRM FED)
Subject: Re: Action Items from OpCom

The timeline for item 1 has been revised to Friday, June 8th.

John M. Abowd, PhD
Associate Director and Chief Scientist
Research and Methodology
U.S. Census Bureau

Office 301.763.5880 (simulring on cell) Room (b) (6)
john.maron.abowd@census.gov

census.gov
Connect with us on Social Media

From: John Maron Abowd (CENSUS/ADRM FED)
Sent: Tuesday, June 5, 2018 4:52:23 PM
To: (b) (6); Lisa B Stewart (CENSUS/ADRM FED); (b) (6)
Cc: John L Eltinge (CENSUS/ADRM FED)
Subject: Action Items from OpCom

I did double duty since John E was giving his Herriot lecture and enjoying the well-deserved reception. Here are the action items from today's OpCom.

1. The administrative record of the Secretary of Commerce's decision to instruct the Census Bureau to put a question on citizenship onto the 2020 Census has been FOIAed. *Tomorrow, June 6th, the administrative record will be released to the Hill and as a FOIA response on www.census.gov.* This record contains hundreds of emails and internal memos. Everyone in your Centers should be explicitly reminded that all inquries about the citizenship question and this administrative record should be directed to the Office of Public Affairs in the Department of Commerce https://www.commerce.gov/doc/os/office-public-affairs. You may also

AMERICAN OVERSIGHT

direct inquiries to our own PIO.

2. The IRS Safeguard Review will run from Tuesday, July 17th through Thursday, July 19th. Even though R&M is an old-hand at Safeguard Reviews, please ensure that any staff invited to pre-Safeguard meetings or Safeguard events accepts those invitations and attends those meetings. Please ask your staffs to look around and make sure that all work and open spaces have been sanitized appropriately.
3. In case you missed the announcement, Karen Dunn Kelley has been nominated as Deputy Secretary of Commerce. Confirmation hearings have not yet been scheduled.

Thanks,

John M. Abowd, PhD
Associate Director and Chief Scientist
Research and Methodology
U.S. Census Bureau

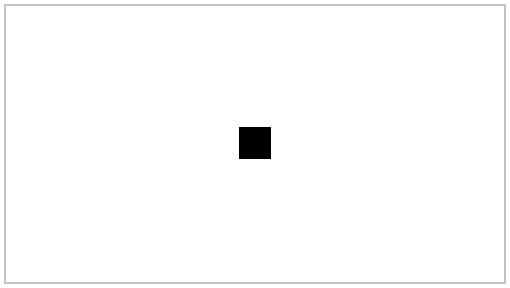
Office 301.763.5880 (simulring on cell) Room (b) (6)
john.maron.abowd@census.gov

census.gov
Connect with us on Social Media

AMERICAN OVERSIGHT

From: Isaac Dompreh (CENSUS/CSRM FED)
To: Tommy Wright (CENSUS/CSRM FED)
Cc: Martin Klein (CENSUS/CSRM FED)
Subject: Supreme Court to hear citizenship question to 2020 Census
Date: Friday, November 16, 2018 2:40:18 PM

https://www.usatoday.com/story/news/politics/2018/11/16/census-2020-supreme-court-hear-case-adding-citizenship-question/2026725002/



Supreme Court to hear case on Trump administration plan to add citizenship question to 2020 Census

www.usatoday.com

The Supreme Court agreed Friday to weigh in on the dispute over the Trump administration's plan to add a question about citizenship to the 2020 Census.

Isaac Dompreh,
Research Mathematical Statistician
Statistical Computing Area
Center for Statistical Research and Methodology (CSRM)
Associate Directorate for Research and Methodology (ADRM)
U.S. Census Bureau, Department of Commerce
isaac.dompreh@census.gov
(301)763-6801

AMERICAN OVERSIGHT

From: Tommy Wright (CENSUS/CSRM FED)
To: Isaac Dompreh (CENSUS/CSRM FED)
Cc: Martin Klein (CENSUS/CSRM FED); (b) (6)
Subject: Supreme Court to hear citizenship question to 2020 Census
Date: Friday, November 16, 2018 2:44:04 PM

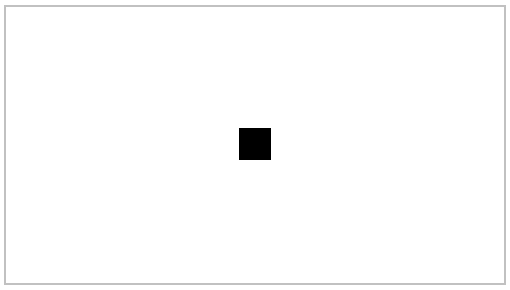
Thanks for sharing, Isaac.

Sincerely,

Tommy

From: Isaac Dompreh (CENSUS/CSRM FED)
Sent: Friday, November 16, 2018 2:40 PM
To: Tommy Wright (CENSUS/CSRM FED)
Cc: Martin Klein (CENSUS/CSRM FED)
Subject: Supreme Court to hear citizenship question to 2020 Census

https://www.usatoday.com/story/news/politics/2018/11/16/census-2020-supreme-court-hear-case-adding-citizenship-question/2026725002/



Supreme Court to hear case on Trump administration plan to add citizenship question to 2020 Census

www.usatoday.com

The Supreme Court agreed Friday to weigh in on the dispute over the Trump administration's plan to add a question about citizenship to the 2020 Census.

Isaac Dompreh,
Research Mathematical Statistician
Statistical Computing Area
Center for Statistical Research and Methodology (CSRM)
Associate Directorate for Research and Methodology (ADRM)
U.S. Census Bureau, Department of Commerce

AMERICAN OVERSIGHT

isaac.dompreh@census.gov
(301)763-6801

AMERICAN OVERSIGHT

From:	BOC BROADCAST (CENSUS/DIR)
Subject:	The Executive Order and the 2020 Census
Date:	Monday, July 15, 2019 8:09:15 AM

To: All Staff

From the Desk of Steven Dillingham, Director...

On July 2, the U.S. Census Bureau initiated printing of the 2020 questionnaires without a citizenship question and continues to do so in accordance with the "Executive Order on Collecting Information about Citizenship Status in Connection with the Decennial Census" issued July 11, 2019. We are currently reviewing the executive order, beginning to implement it, and evaluating next steps to ensure we fully comply.

We will continue our work to ensure the unparalleled quality of our censuses and surveys. This includes the work many of you are engaged in to conduct a complete and accurate 2020 Census. Throughout the decade, you have remained focused on the purpose of the census: to count everyone once and only once, and in the right place.

The 2020 Census is important to everyone living in this country.

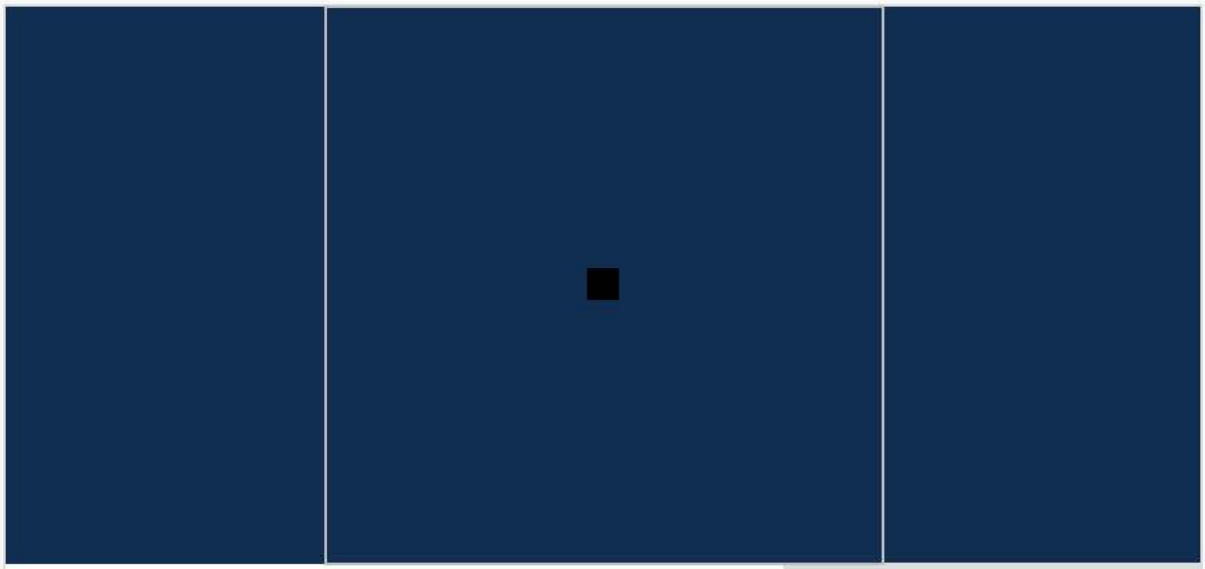
As you know, responses to the 2020 Census are safe, secure and required by federal law to be kept strictly confidential. Responses can only be aggregated with other data to produce statistics. Individuals' responses cannot be used for law enforcement purposes. By law, all responses to Census Bureau household and business surveys are kept completely confidential. We, as Census Bureau employees, take an oath to protect this personal information for life.

We appreciate your continued dedication and work to support the mission of the Census Bureau. Keep up the good work!

AMERICAN OVERSIGHT

From: Tommy Wright (CENSUS/CSRM FED)
To: (b) (6)
Subject: U.S. Census Bureau Daily News - Friday, July 31, 2020
Date: Friday, July 31, 2020 12:22:48 PM

From: U.S. Census Bureau <census@subscriptions.census.gov>
Sent: Friday, July 31, 2020 11:43 AM
To: Tommy Wright (CENSUS/CSRM FED) <Tommy.Wright@census.gov>
Subject: U.S. Census Bureau Daily News - Friday, July 31, 2020



Census Daily News Digest

July 31, 2020

Full Daily Digest

Click Here

photo

2020 Census Spotlight

Topeka, KS' CBS affiliate [WIBW-TV] highlighted comments from Reps. Roger Marshall [R-KS], Ron Estes [R-KS], Steve Watkins [R-KS] and

2020 Census in the News

Summary

NPR, Science Magazine, and New York Daily News covered Director Dillingham's testimony on Wednesday before the House Committee on Oversight and Reform's hearing regarding the 2020 Census. Axios reported on how the Census

AMERICAN OVERSIGHT

Bureau successfully revamped its digital outreach efforts for the 2020 Census, quoting Stephen Buckner, who noted that online response rates are higher than expected. Colorado Politics quoted Director Dillingham from the Census Bureau's America Counts story about the 27J School District in suburban Denver to highlight how responding to the census can help a locality determine whether they need to build a new school. World Journal reported on community efforts to help raise participation rates in Chinatown, New York, through the use of fortune cookies. Vien Dong Daily reported on community efforts in Orange County, California, to raise awareness of the 2020 Census by holding a parade through communities with low response rates.

National & Top-Tier News

View today's national broadcast report.

When Does Census Counting End? Bureau Sends 'Alarming' Mixed Signals

NPR – Hansi Lo Wang, July 30

The Census Bureau is sending mixed signals about when it plans to finish efforts to count every person living in the U.S. for the 2020 census amid growing concerns among Democrats in Congress that the White House is pressuring the bureau to stop counting soon for political gain.

The social media census

Axios – Kim Hart, July 30

The Census Bureau has placed a big bet on

Sharice Davids [D-KS] urging their constituents to respond to the census. Cincinnati, OH's City Beat reported that households in Covington, KY can stop by the Census Grill Out & Ice Cream Event on Friday, to complete their 2020 Census, will receive hot dogs, hamburgers, chips and soda to go. Sing Tao USA reported on the launch of the Mobile Questionnaire Assistance program and how it will help participation rates. The Korea Times reported on Preside Trump's memorandum regarding congressional apportionment. Nguoi Viet reported that the U.S. Census Bureau is sending out reminder postcards for the last time before enumerator visits begin in August.

Census Bureau Spokespeople in the News

Rochester, NY's CBS

AMERICAN OVERSIGHT

digital outreach, especially on social media networks, as it enters the last big push to get people to respond to the 2020 count.

The big picture: Not only is this year the first online census count, it's also a giant experiment in how to reach people virtually in a fragmented media environment during a public health crisis that sidelined in-person field operations.

Census Data in the News

As Schools Shut Down, a New Federal Program Eased Child Hunger, Study Finds New York Times

Initial jobless claims soar for second week, GDP falls by record 33 percent NBC News Online

More than 50% of US adults live in households that lost income in pandemic CNN

Regional 2020 Census News

Atlanta Region

View today's broadcast report for the Atlanta Region.

County's 2020 census response rate among lowest in the state

Donalsonville News [GA] – Staff Writer, July 30

Seminole County and most counties in Georgia are lagging in the count of the 2020 U.S. Census as outreach workers struggle to reach communities in isolated areas for counting amid the Coronavirus pandemic.

Opinion: Be counted in Census 2020, Alabama

WVTM-TV [AL] – Susana Schuler, July 30

affiliate (WROC-TV) interviewed Michael Cook about the upcoming NRFU operation. The Philadelphia Inquirer noted that census takers are going door-to-door to increase response rates in Philadelphia, quoting Fernando Armstrong who said the Census Bureau will look for all ways to reach households who have not yet responded. Rock Island, IL's NPR affiliate (WVIK-FM) quoted Marilyn Sanders who said census takers are working to close the gap in 2020 Census response rates, highlighting the impact on federal funding that is distributed to local communities based on census data. Denver's CBS affiliate (KCNC-TV) quoted Dennis Johnson emphasizing the importance of responding to the census now so a census taker doesn't have to visit your household

AMERICAN OVERSIGHT

Here's something everyone can do to have a significant impact that will last 10 years if not more: Complete the 2020 Census. Participating is required by law in all 50 states and the five US Territories. The data you provide will be used over the next decade to allocate federal funds for hospitals, schools, fire, police, roads and other critical infrastructure. Lack of participation could cost Alabama one of its seven US House of Representative seats.

Opinion: Fill out your Census, for Florida's sake

South Florida Sun Sentinel [FL] – Mark Adler, July 30

The Census gives a voice to every individual for federal funding of their communities and for fair civic representation. Florida Counts Census 2020 is a coalition of Florida nonprofit organizations, and we are alarmed at the weak self-response rates in Florida for the 2020 Census. We ask our national, state and local government officials to use your influence to help improve census response in your community.

Less than half county residents have responded to Census

The Augusta Chronicle [GA]— Carol McLeod, July 30

Jefferson County's response to Census 2020 is just less than 50 percent. The Census, which is good for 10 years, is the basis for much federal and state funding. Julianne Harper, the chair of the Census committee, said Georgia receives more than $2,000 per person per year until the Census is taken again, which will be in 2030.

during NRFU. Buffalo, NY's NBC affiliate (WGRZ-TV) interviewed Jeff Behler who talked about Buffalo's self-response rate (49.9%) and noted that this is the first decennial census where people are able to respond online or by phone. Sing Tao USA, U.S. China Press, Radio Korea, SinoVision, ZW TV, and an additional Sing Tao USA article quoted Census Bureau partnership specialists who spoke at separate press briefings to provide operational updates and provide reminders about the importance of the 2020 Census. Other Census Bureau spokespeople were quoted in the following regions: Chicago (Chicago), Los Angeles (Hawaii), Denver (Texas, Texas), and New York (New York, New York, New York).

Beltway & Other Online

AMERICAN OVERSIGHT

Monies received from federal and state sources include funding for services like hospitals and schools.

Chicago Region

View today's broadcast report for the Chicago Region.

Editorial: It's critical that everyone stand up and be counted

South Bend Tribune [IN] – Editorial Board, July 31

The coronavirus pandemic has forced adjustments in the way the census has been conducted. But one thing hasn't changed: the importance of getting an accurate count. Even in normal times, getting people to respond to the once-in-a-decade census is a challenge. The new normal has created additional complications, as noted in a recent Tribune report. The pandemic has delayed the census, which ordinarily would be wrapped up. Instead, it has been extended through Oct. 31.

Minnesota census workers reassure the undocumented as Trump memo renews fears

MinnPost [MN]— Tiffany Bui, July 30

Before Mónica Hurtado could persuade anyone to volunteer personal information for the 2020 census, she had to be persuaded herself. And three years ago, she was a big skeptic. "We know how deep is the distrust of BIPOC [Black, Indigenous and people of color] communities of big systems," said Hurtado, the racial justice and health equity organizer at Voices for Racial

News

Beltway & Other Online News Census director dodges legislators' questions about Trump memo on undocumented residents

Science Magazine – Jeffrey Mervis, July 30

Census Bureau Director Steven Dillingham spent 2 hours yesterday trying not to take sides in a fiercely partisan debate over how the 2020 U.S. census will be used to determine representation in the U.S. House of Representatives. He largely succeeded, but some Democrats worried the nation's largest statistical agency might pay a high price for his neutrality.

Multicultural News

3 Months to Census Deadline... Visits Begin Next Month

The Korea Times [CA] – Seok Han Hyung, July 29

AMERICAN OVERSIGHT

Justice.

Quad City Census Response Reaches over 60%

WVIK-FM [IL] – Marianna Bacallao, July 30

While over 60% of Illinois and Iowa residents have filled out the 2020 Census, there's still thousands who have not. Marilyn Sanders from the Regional Census Bureau says she's trying to close that gap by mailing reminders and knocking on doors.

Census Workers Starting to Canvas in Peoria

WCBU-FM [IL] – Joe Deacon, July 30

U.S. Census Bureau workers have started going door-to-door in the Peoria area to boost participation in the nationwide population count.

City Reveals Project to Boost Census Numbers

Lawndale News [IL] – Ashmar Mandou, July 30

The City unveiled a new civic engagement program designed to boost Census participation on Wednesday afternoon. Entitled “Boards of Change,” the project will host an array of events citywide, such as registering to vote, going to the polls, and engaging in public dialogue.

Mayors make bet on Census response rates

Texarkana Gazette [AR] – Karl Richter, July 30

The mayors of both Texarkanas challenged each other Tuesday to boost U.S. Census response rates, wagering a week's worth of wardrobe. Arkansas-side Mayor Allen Brown, Texas-side Mayor Bob Bruggeman and teams comprising members of the local Joint Census Committee

The 2020 Census response deadline is approaching and the U.S. Census Bureau will begin sending census enumerators to unresponsive households next month. This is an effort to collect accurate data which has been impeded by COVID-19 and is being now further impeded by President Trump's controversial order to exclude undocumented immigrants from being counted in redistricting. This is likely to cause more fear and avoidance to participate among the immigrant community. California has a large immigrant population, especially in the Los Angeles area, and with an already low participation rate, it is important to reach out to the immigrant population and increase their participation. California has also filed a lawsuit over this unconstitutional order.

AMERICAN OVERSIGHT

plan to push for more Census responses from residents.

Still time to complete 2020 census

WSAW-TV [WI] – Tony Langfellow, July 30

If you haven't completed the 2020 U.S. Census, the Census Bureau wants to remind everyone to complete it as soon as possible. On Thursday, July 30, the Census Bureau was stationed at Wausau City Hall for its "Wausau Count" event. The event helped provide those in Wausau an opportunity to get questions answered and to complete the survey.

Census workers begin door knocks Thursday

WRTV-TV [IN] – Kelsey Anderson, July 30

Just like everything else in 2020, the 2020 Census deadline was pushed back. Starting Thursday, census enumerators will be going door-to-door to reach out if you didn't mail back the form.

Denver Region

View today's broadcast report for the Denver Region.

Not Too Late to Avoid In-Person Census Visits

Public News Service [NE] – Eric Galatas, July 31

Census workers soon will be heading into Nebraska neighborhoods to ensure that people who have not yet responded to the 2020 census are counted in the once-a-decade tally mandated by the U.S. Constitution. Households can avoid in-person visits and save taxpayer dollars by filling out their form online at my2020census.gov.

The citizenship question is not included in the survey and how the Trump administration plans to move forward with their plan are unclear since questions about immigration status are not included in the census survey. The U.S. Census Bureau emphasizes the safety and security of personal information and encourages everyone to participate in order to achieve a full and accurate count.

Census is Postponed to End of October, New York's Response Rate Only Over 50%, Census Takers will Visit Unresponsive Starting from 8/11

SinoVision [NY] – Ruobing Li, July 28

A telephone press conference was held on Jul. 28, and an update of the next phase of the 2020 Census was announced, including the upcoming field operations of census

AMERICAN OVERSIGHT

2020 Census: The Effort To Reach The FLDS Community

KUER-FM [UT]– Lexi Peery, July 30

Almost 60% of Iron County residents have completed the U.S. Census, but according to census tract data, less than a quarter of the people in the eastern part of the county have done it. And that's where many Fundamentalist Church of Jesus Christ of Latter-day Saints now live, according to Iron County Commissioner Mike Bleak.

Census Bureau highlights Brighton-area school district in reminder to respond to census

Colorado Politics [CO] - Michael Karlik, July 30

The U.S. Census Bureau has pointed to 27J Schools in Brighton to illustrate how census response can affect planning for new K-12 facilities.

Want To Keep Census Workers From Knocking On Your Door? Fill Out The 2020 Census Now

KCNC-TV [CO] - Jennifer McRae, July 30

Census workers started going door-to-door in Denver, Arvada and other parts of the Denver metro area on Thursday. They're trying to ensure that everyone has filled out their 2020 Census.

Opinion: Want racial justice? Start with filing out your Census

Alamogordo Daily News [NM] - Suzanne McCormick, July 30

Those living in our nation's poor and minority takers in the local community. Chinese Partnership Specialist Robyn Yang emphasized the importance and urgency of responding to the 2020 Census. Ms. Yang emphasized that the 2020 Census data include citizens and non-citizens. From Aug. 11 to Oct. 31, census takers will knock on doors of households who have not completed the form. She added, "Personal information of the 2020 Census is confidential and protected by federal law. Your personal information can only be used to generate statistical data and cannot be used against you. Your census data is safe and reliable." Finally, she urged people to complete the form online, by phone or by mail. Language support includes Mandarin and Cantonese.

Census Takers Will Come in August. Have

AMERICAN OVERSIGHT

communities have historically gone undercounted in the U.S. Census. For instance, nearly one million Black Americans went uncounted nationwide in the 2010 Census. Fortunately, there's an easy step you can take that will go a long way towards ensuring everyone in our communities gets the representation and resources they deserve.

Marshall urges Kansans to complete Census

WIBW-TV [KS] – Sarah Motter, July 30

Congressman Roger Marshall is urging Kansans to complete the 2020 Census. Congressman Roger Marshall says the Census impacts the number of funding communities receive, how they plan and how representation is determined at State and Federal Levels. "The Census is a small way for Kansans, no matter where they live, to have a big impact in their community," said U.S. Congressman Roger Marshall, M.D.

Crews hit the streets in Loveland to fill gaps in 2020 census

Loveland Reporter-Herald [TX] - Max Levy, July 30

Census workers started field operations on Thursday, visiting Loveland households that had not yet shared information for the nation's 2020 census.

Deadline to fill out U.S. Census extended to October 31

Tyler Morning Telegraph [TX] – Taylor Miller, July 30

You Responded to the Questionnaire?

ZW TV [CA] – N/A, July 28

Due to the impact of the epidemic, the 2020 Census was extended through October. Census takers will also visit households who have not yet filled out the questionnaire beginning August. The U.S. Constitution stipulates a decennial census held every ten years in the country. The data will affect the distribution of federal funds, public facilities, etc. Anyone living in the United States must fill it out! Partnership Specialist April Kuan also gave operational updates and urged people to complete the 2020 Census online, by phone or by mail. She emphasized that the 2020 Census data includes citizens and non-citizens.

The Response Rate of

AMERICAN OVERSIGHT

The city of Tyler has reached a 57.5% response rate to the 2020 Census, compared to 2010's 66.1% response rate. Tyler residents however are in luck, as the deadline to complete the census has been extended to October 31 due to the COVID-19 pandemic.

Dodge County sees strong census self-response rate

Fremont Tribune [NE] – Noah Johnson, July 30

Dodge County continues to put up strong self-response numbers as the 2020 Census nears the end of its self-response period. The county has experienced a 66.8% self-response rate throughout the period, according to David Drozd, research coordinator for the Center for Public Affairs Research at the University of Nebraska Omaha.

Los Angeles Region

View today's broadcast report for the Los Angeles Region.

Census Bureau visiting non-responding households in Whatcom County this week

The Bellingham Herald [WA] – Mack Ervin, July 30

If you haven't filled out the 2020 Census yet, you may be visited very soon.

Census takers will start doing follow-up visits with non-responding households on Thursday, July 30, according to the U.S. Census Bureau. The response rate for houses in Whatcom County is 69%, higher than the average response rate for Washington state, at 67.7%,

the Chinese Community is Low, the Census Bureau Urges to Fill out the Form as Soon as Possible

Sing Tao USA [NY] – Jingran Zhou, July 28

The U.S. Census Bureau shared the latest 2020 Census updates to the Chinese media yesterday. The response rate of the Chinese communities in New York City, New Jersey and Boston is low. It is hoped that the Chinese community will fill out their forms as soon as possible, and the Census Bureau is currently recruiting Chinese bilingual part-time jobs in preparation for home visits beginning Aug. 11. Due to the impact of COVID-19, the 2020 Census has been delayed. The original deadline of Jul. 31 was extended to Oct. 31. The Census Bureau is making the best effort to ensure a complete count of the U.S.

AMERICAN OVERSIGHT

and the country, at 62.3%.

Santa Clara County To Place Census Kiosks At COVID-19 Testing Sites

KPIX-TV [CA] – Staff Writer, July 30

Santa Clara County announced on Wednesday that it will set up Census 2020 kiosks at pop-up COVID-19 testing sites to mitigate the effects of President Donald Trump's claim that he will exclude undocumented immigrants from the counts used in congressional redistricting. The kiosks are part of a larger effort to ensure that all county residents are counted and will provide tablets for people waiting to get tested to fill out the census on the spot.

65.2% of Pasadenans Have Responded to the 2020 Census

Pasadena Now [CA] – Brian Day, June 30

With the 2020 census season more than halfway through, Pasadena officials are urging local residents to make sure they are counted in order to make sure the city and state get their fair share of tax revenue, as well as prevent the state from losing one or more congressional seats for the first time in history.

Hawaii below national average when it comes to participation in the US Census

KITV-TV [HI] – Nicole Tam, July 30

The state of Hawaii is below the national average when it comes to participation in the U.S. Census. On Oahu, it's above average. To help raise the numbers on all islands, the Hawaii Census Team wants low-response areas better

population. During the conference call, Lewis Liu, a partnership specialist with the Census Bureau, said that the law requires the Census Bureau to protect the census data and keep them strictly confidential. The data will be used to allocate the federal funding and the congressional redistricting. He urges people to complete online or by phone as soon as possible.

How the Census Bureau is reaching historically hard-to-count communities for the 2020 Census

La Raza – Staff Writer, July 28

The Census Bureau has been making extraordinary efforts to reach people who are historically undercounted such as immigrants, children under the age of five, black/African American, American Indians, and

AMERICAN OVERSIGHT

educated in-person and online. Results of the census determines how much money the state receives from $675 billion of federal funding over the next 10 years.

New York Region

View today's broadcast report for the New York Region.

Door to door census to begin

WROC-TV [NY] – Staff Writer, July 31

Census data collectors could be coming to your home this summer. More money has been given to the census bureau to help them spread the word about the nationwide survey. Originally, data collectors would have been knocking on your door by April, but field collection was halted because of the pandemic. But now things are picking back up. At a press conference outside the Rebecca Johnson Elementary School, Galvin and Mayor Domenic J. Sarno were among officials urging all residents to be counted in the census, saying it is necessary for the city to receive its full and fair allotment of federal funds and representation.

Springfield launches door-to-door campaign to boost census response

MassLive [MA] – Peter Goonan, July 30

City and state officials, including Secretary of the Commonwealth William F. Galvin, launched a door-to-door campaign on Thursday aimed at the "critical" task of boosting the response to the 2020 census.

Alaska Natives.

Lag in census participation in Hispanic areas generates concerns

La Raza – Araceli Martinez Ortega, July 27

The difficulties brought by the coronavirus pandemic, coupled with the interference of the Trump administration, have caused a lag in filling out the 2020 Census questionnaire in Latino areas across the country.

Census Week of Action kicks off to boost New Yorkers' participation in the 2020 Census

Univision [NY], July 27

The New York Census Bureau hired 35,000 people to visit households that have not completed the questionnaire, as only 53% of habitants have responded. Different activities will be held this week to motivate participation and inform

AMERICAN OVERSIGHT

'Let me be clear: The president's directive is unconstitutional': Maloney denounces Trump's memo to redraw congressional districts

New York Daily News [NY] – Michael McAuliff, July 30

The director of the U.S. Census did little to reassure Democrats that President Trump is not trying to manipulate America's population count for political benefit. Oversight Committee Chairwoman Rep. Carolyn Maloney (D-N.Y.) called an emergency hearing on the decennial count after Trump released a memo saying he would exclude undocumented immigrants when the numbers are crunched to carve out new congressional districts.

Jersey City ramps up 2020 census efforts

WPIX-TV [NY] – Andrew Ramos, July 30

In the 2010 census, Jersey City was among the most under-counted cities in the nation. In an effort to avoid that from happening again. officials there hit the ground running Thursday, urging residents to get counted.

Buffalo has 49.9% self-response rate so far in 2020 Census

WGRZ-TV [NY] – Kelly Dudzik, July 30

The 2020 Census is going on right now, and there are many ways you can respond if you haven't already. On Thursday, 2 On Your Side's Kelly Dudzik spoke with the New York Regional Director of the U.S. Census Bureau, Jeff Behler, to get answers to some common questions about the census.

the community about the process.

2020 Census: Not Too Late to Reply! U.S. Census Bureau Encourages Local Communities to Actively Respond

U.S. China Press [CO] – N/A, July 27

A telephone press conference was held on Jul. 24. An update of the next phase of the 2020 Census was announced, including upcoming field operations regarding census takers in the local community. The Census Bureau also highlighted the response rates in the Denver region, which spans Texas, Arizona, Colorado, New Mexico, Utah, Oklahoma, Kansas, Nebraska, South Dakota, North Dakota, Montana, and Wyoming. Partnership Specialist Debbie Lee emphasized the importance and urgency of responding to the 2020 Census. "Everyone

AMERICAN OVERSIGHT

Albany falls behind on 2020 census reporting, Mayor Sheehan pushes for complete count

WTEN-TV [NY] – Mikhaela Singleton, July 30

Albany is trailing behind the nation on filling out the census. There's about 100,000 people living in Albany, but around half of households haven't yet been counted in this year's census.

Reminder: respond and be counted in 2020 Census

WWNY-TV [NY] – Katie Benoit, July 30

Officials are reminding north country residents to respond and be counted in the 2020 U.S. Census. Whether it's on paper, online, or on the phone, U.S. Census officials want you to fill out the 2020 Census.

Brooklyn Trails Other Boroughs In 2020 U.S. Census Response: Data

Patch [NY] – Anna Quinn, July 30

Officials are urging Brooklynites to complete the 2020 U.S. Census as the borough trails the rest of New York City in filling out the essential form. Only 51.4 percent of households in Kings County had filled out the Census as of Thursday, compared to 58.3 percent of households across New York State and nearly 63 percent nationally, according to data from the U.S. Census Bureau.

Officials share census message for military families: 'You count here'

The Day [CT] – Kimberly Drelich, July 30

Lt. Gov. Susan Bysiewicz said census workers are beginning to knock on doors of homes that

knows that the 2020 census is still in progress. We must count everyone living in the United States. This includes citizens and non-citizens, infants, adults, the elderly, and everyone living in the same household. The 2020 Census responses are important for our community." Ms. Lee also said, "A very important point: If you do not respond to the 2020 Census as soon as possible, your community may miss out on annual federal funding for the next 10 years. Your response is very important. Every uncounted person will make the community lose important funding every year." In addition to providing important field operation announcements, Ms. Lee also answered various common questions about who should be counted, census takers, and

AMERICAN OVERSIGHT

have not yet responded to the census. At the end of last week, census enumerators, wearing badges, messenger bags with the census logo, and personal protective equipment started in Hartford, Tolland, Windham, and New London counties.

Minorities risk being underrepresented in the 2020 census

NJTV-TV [NJ] – Raven Santana, July 30

After a 4-month delay, census workers started knocking on doors to remind Jersey City residents to fill out the form that comes every 10-years so New Jersey can get its fair share of federal funding. While most people in New Jersey are filling out their census, state leaders say the people who need it the most aren't.

Reminder: respond and be counted in 2020 Census

WWNY-TV [NY] – Katie Benoit, July 30

Officials are reminding north country residents to respond and be counted in the 2020 U.S. Census.

Whether it's on paper, online, or on the phone, U.S. Census officials want you to fill out the 2020 Census. "There's still time to self respond. It's not to late," said Lisa Moore, assistant regional Census manager.

Philadelphia Region

View today's broadcast report for the Philadelphia Region.

2020 Census efforts are targeting Philadelphia COVID-19 safety measures.

Encouraging Census Participation, 13 Million Fortune Cookies Sent to Merchants in Chinatown

World Journal [NY] – Cheng Zhang, July 27

Thirteen million fortune cookies containing a message to encourage 2020 Census participation were sent to Chinese restaurants in Chinatown on Jul. 27. The slogan, "Don't be left out, you matter" was printed in each fortune cookie. These days, the hot food delivery industry and outdoor restaurants are stimulating the Chinese food industry and sending information to more New Yorkers throughout this industry. Within 100 days before the end of the 2020 Census, everyone can take five minutes to receive a funding of $1,000.

Caravan of Vehicles to

AMERICAN OVERSIGHT

area households that haven't responded

The Philadelphia Inquirer [PA] – Michaelle Bond, July 30

On Saturday, a caravan of about 20 cars and some bikes will travel through North and West Philadelphia — specifically Strawberry Mansion, Mantua, and Belmont — playing music and encouraging participation in the 2020 Census in neighborhoods that the Census Bureau has historically undercounted and that are trailing in responses.

Richmond census response rate falls behind National average

WTVR-TV [VA] – Vernon Freeman Jr., July 30

The Virginia Census response rate has surpassed the National rate, but the numbers in the City of Richmond tell a different story. As of July 19, Richmond has a current self-response rate of 57.2%, falling below the state rate at 66.9% and the national rate of 62.1%, according to the U.S. Census Bureau.

Worester County Census Participation On Target

The Dispatch [MD] - Charlene Sharpe, July 30

Local participation in the 2020 Census is expected to be on target with response rates from previous years. Officials said this week Worcester County's response rates were near what they were in 2010. Kelly Henry, coordinator of Worcester County's Complete Count Committee, said people have until Oct. 31, 2020, to complete their survey.

Encourage People to Respond to 2020 Census

Vien Dong Daily [CA] – Thanh Phong, July 27

Every 10 years the Census Bureau will conduct a census count of the population in the U.S. and five U.S. territories. Due to COVID 19, 2020 Census operations and efforts to collect census data have been difficult. So local officials, community leaders, and volunteers came together to coordinate a parade to drive through the City of Garden Grove and Stanton to encourage everyone to respond to the 2020 Census. The parade started at 1 p.m. on Jun. 24 in the City of Stanton. The parade drove through the areas with low response rates with speakers with a message to encourage everyone to respond to the 2020 Census questionnaire in three languages, English,

AMERICAN OVERSIGHT

Northern Kentucky's Dari-Crest Giving Away Foot-Longs and Ice Cream to Anyone Who Fills Out the Census

City Beat [OH] – Staff Writer, July 30

A Northern Kentucky city is once again bribing its citizens to fill out their Census form. Last time, Newport was giving away $50 gift cards to anyone who could prove they completed their Census. This time, the Covington Census Committee is heading to Dari-Crest Ice Cream in Latonia to give away swag bags and tasty treats to those who fill out their Census form on Friday night.

Vietnamese and Spanish. Everyone can still respond to the census online at www.2020census.gov or call the Vietnamese helpline at 844-461-2020.

Trump's order affects census in California, Florida, and Texas

Azteca – Ju Carpy, July 26

If President Donald Trump succeeds in excluding undocumented immigrants living in the United States from being counted to redefine the districts of the U.S. House of Representatives, California, Florida, and Texas will end up with one less congressional seat each if not every resident is counted, according to an analysis performed by a group of experts.

Trump sued for memorandum excluding undocumented from

AMERICAN OVERSIGHT

census

Telemundo 47 [NY] – Staff Writer, July 24

On Friday, a coalition of states, counties, and cities filed a federal lawsuit against President Donald Trump for his memorandum that bans undocumented immigrants from the process of drawing congressional districts.

Households will receive a final reminder to respond to the census before the rollout of census takers visits begins

La Raza – Staff Writer, July 24

The United States Census Bureau will send reminder postcards this week to about 34.3 million households. This will be the final reminder before census takers begin visiting homes that have not responded by mid-August. Responding now minimizes the need for

AMERICAN OVERSIGHT

census takers to visit households to collect responses in person.

Census Bureau Sending Out the Last Reminder

Nguoi Viet [DC] – N/A, July 24

The Census Bureau is sending the last reminder to about 34.3 million households this coming week. The letter is to remind everyone to respond to the 2020 Census to avoid a census enumerator visit and conserve everyone's time. According to 2020 Census response rates, more than 92 households, equivalent to 62.3% have responded online, by phone or mail. The Census Bureau strongly encourages everyone to respond on the census website www.2020census.gov, by phone offered in 12 different languages, or just submit questionnaires sent out to households in March.

AMERICAN OVERSIGHT

[2020 Census Launches MQA Project]

Sing Tao USA [MA] – N/A, July 24

Between Jul. 13 and Sept. 18, more than 3,000 Census Bureau employees will begin to visit communities with the lowest 2020 Census response rates to encourage and assist residents to complete the 2020 Census on their own. This operation, called the Mobile Questionnaire Assistance program (MQA), is different from the census takers who will visit families that have not responded. The Census Bureau will conduct a nationwide Non-Response Follow Up (NRFU) beginning Aug. 11. Before this follow-up operation, MQA is the last effort to encourage residents to complete the 2020 Census questionnaire.

[2020 Census Needs Korean Participation]

AMERICAN OVERSIGHT

Radio Korea [PHL] – Hwang Lee, July 23

In a telephone media conference on Jul. 23, the U.S. Census Bureau encouraged the Korean community to participate in the 2020 Census. Partnership Specialist Jiyun Back emphasized the safety and security of participating in the 2020 Census and reminded Koreans of the importance of participation to directly impact the Korean community. Language support services in Korean can also be found for those in need. The 2020 Census deadline has been extended to Oct. 31 and census enumerators will begin visiting homes Aug. 11. They will follow all health guidelines and practice social distancing.

Census Media Conference Call: 10 Minutes Can Bring $18,000 Funding

AMERICAN OVERSIGHT

Sing Tao USA [MA] – Qiang Li, July 23

On Jul. 23, a 2020 Census Chinese media conference call was successfully held. Officials of the Census Bureau shared the progress of the 2020 Census and Chinese media representatives shared the various measures taken to encourage the Chinese community in the eastern U.S. to participate in the 2020 Census. Huichun Chang, a Chinese Partnership Specialist of the U.S. Census Bureau, gave detailed operational updates in Mandarin during the conference call. (Note: This story was also reported by Washington Chinese Daily News in Simplified in Traditional Mandarin, Bostonese, and Southern Chinese Daily.)

Census Bureau Announcement: Today U.S. Population has

AMERICAN OVERSIGHT

Reached 330 Million

World Journal [CA] – N/A, July 23

The U.S. Census Bureau today provided population estimates and predicted that as of 8:02 a.m. Eastern Daylight Time on Jul. 23, the U.S. population has reached a new milestone: 330 million people. The clock shows a net increase of one person every 16 seconds.

The 2020 Census Chicago Response Rate 54.8%; U.S. Census Bureau Encourages Local Communities to Respond

Chicago Chinese Times [IL] – N/A, July 22

The U.S. Census Bureau held a Chinese media phone briefing on Jul. 17. At the meeting, a Chinese representative of the Census Bureau provided operational updates for the next phase of the 2020 Census and encouraged

AMERICAN OVERSIGHT

completion of the 2020 Census form online or by phone before Aug. 11. Wendy Yang, a Mandarin spokesperson with the Census Bureau, said that the U.S. federal government allocates 675 billion U.S. dollars each year according to the population. Wendy Yang also emphasized that the Census Bureau will send census takers to each community from Aug. 11 to Oct. 31 to knock on doors of households who have not yet completed the 2020 Census questionnaire. All Americans need to be counted in the census. This Chinese media briefing was hosted by the Y&R team. Edward Chang, the managing director of TDW+Co, the official 2020 Census advertising partner of the Asian American community, said at the meeting that, "Oct. 31 will be the last day that our community can be counted. This statistic is

AMERICAN OVERSIGHT

very important, because the data will determine the funding in your community for the next 10 years and the number of public representatives. Whether the community can receive a fair distribution depends on the census data."

[USA: Uncertainty after order to exclude undocumented immigrants from the 2020 Census]

VOA Noticias – Celia Mendoza, July 22

The 2020 Census will determine the new redistribution of the congressional districts of the United States, which are representative of the population. However, President Donald Trump's most recent action around those who should not be counted is creating controversy.

[A public effort begins to boost 2020 Census participation]

AMERICAN OVERSIGHT

Minnesota de Hoy [MN] – Staff Writer, July 22

More than 3,000 U.S. Census Bureau staff members will start visiting the communities with the lowest response rates to encourage and assist people to respond to the 2020 Census.

Census takers begin home visits today in select areas that have not yet responded to the census

La Raza – Staff Writer, July 22

The United States Census Bureau announced that it will start to follow up with households in selected areas that have not yet responded to the 2020 Census.

About Census Daily News Digest

Census media monitoring is a daily compendium of articles about the Census Bureau and a representative sampling of the most important and relevant news coverage and commentary. Opinions expressed above do not belong to the Census Bureau, or its staff. English translations, in summary form, have

AMERICAN OVERSIGHT

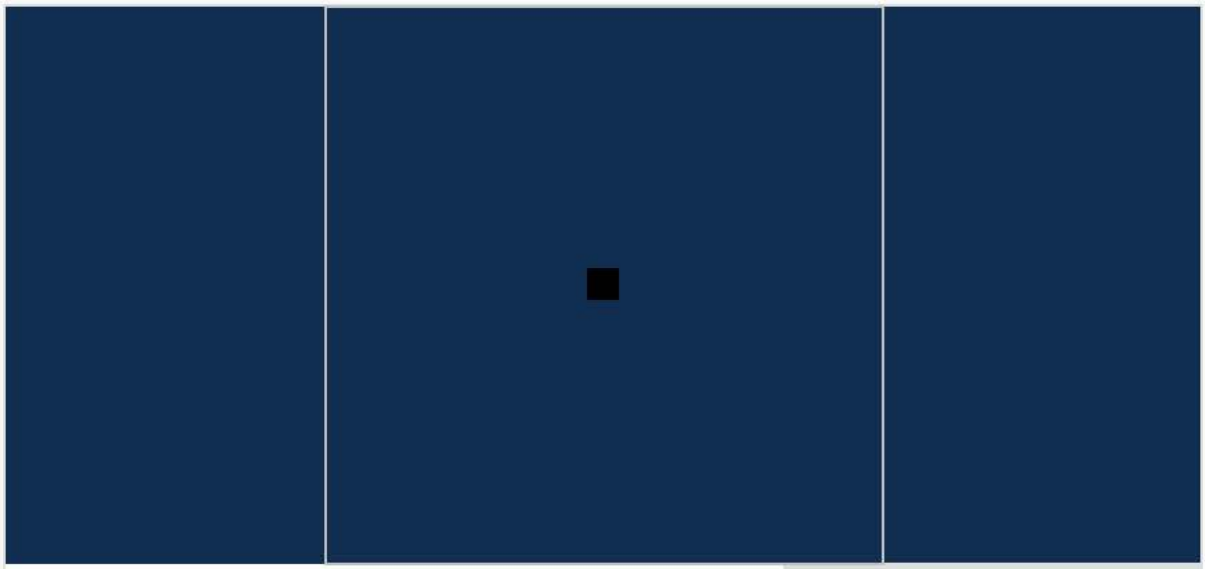
been provided for all in-language articles included in this report.

This is an official email from the U.S. Census Bureau. If you have any questions or comments, please contact us (http://www.census.gov/about/contact-us.html).

AMERICAN OVERSIGHT

From: Tommy Wright (CENSUS/CSRM FED)
To: (b) (6)
Subject: U.S. Census Bureau Daily News - Friday, July 31, 2020
Date: Friday, July 31, 2020 12:22:47 PM

From: U.S. Census Bureau <census@subscriptions.census.gov>
Sent: Friday, July 31, 2020 11:43 AM
To: Tommy Wright (CENSUS/CSRM FED) <Tommy.Wright@census.gov>
Subject: U.S. Census Bureau Daily News - Friday, July 31, 2020



Census Daily News Digest

July 31, 2020

Full Daily Digest

Click Here

photo

2020 Census Spotlight

Topeka, KS' CBS affiliate [WIBW-TV] highlighted comments from Reps. Roger Marshall [R-KS], Ron Estes [R-KS], Steve Watkins [R-KS] and

2020 Census in the News

Summary

NPR, Science Magazine, and New York Daily News covered Director Dillingham's testimony on Wednesday before the House Committee on Oversight and Reform's hearing regarding the 2020 Census. Axios reported on how the Census

AMERICAN OVERSIGHT

Bureau successfully revamped its digital outreach efforts for the 2020 Census, quoting Stephen Buckner, who noted that online response rates are higher than expected. Colorado Politics quoted Director Dillingham from the Census Bureau's America Counts story about the 27J School District in suburban Denver to highlight how responding to the census can help a locality determine whether they need to build a new school. World Journal reported on community efforts to help raise participation rates in Chinatown, New York, through the use of fortune cookies. Vien Dong Daily reported on community efforts in Orange County, California, to raise awareness of the 2020 Census by holding a parade through communities with low response rates.

National & Top-Tier News

View today's national broadcast report.

When Does Census Counting End? Bureau Sends 'Alarming' Mixed Signals

NPR – Hansi Lo Wang, July 30

The Census Bureau is sending mixed signals about when it plans to finish efforts to count every person living in the U.S. for the 2020 census amid growing concerns among Democrats in Congress that the White House is pressuring the bureau to stop counting soon for political gain.

The social media census

Axios – Kim Hart, July 30

The Census Bureau has placed a big bet on

Sharice Davids [D-KS] urging their constituents to respond to the census. Cincinnati, OH's City Beat reported that households in Covington, KY can stop by the Census Grill Out & Ice Cream Event on Friday, to complete their 2020 Census, will receive hot dogs, hamburgers, chips and soda to go. Sing Tao USA reported on the launch of the Mobile Questionnaire Assistance program and how it will help participation rates. The Korea Times reported on Preside Trump's memorandum regarding congressional apportionment. Nguoi Viet reported that the U.S. Census Bureau is sending out reminder postcards for the last time before enumerator visits begin in August.

Census Bureau Spokespeople in the News

Rochester, NY's CBS

AMERICAN OVERSIGHT

digital outreach, especially on social media networks, as it enters the last big push to get people to respond to the 2020 count.

The big picture: Not only is this year the first online census count, it's also a giant experiment in how to reach people virtually in a fragmented media environment during a public health crisis that sidelined in-person field operations.

Census Data in the News

As Schools Shut Down, a New Federal Program Eased Child Hunger, Study Finds New York Times

Initial jobless claims soar for second week, GDP falls by record 33 percent NBC News Online

More than 50% of US adults live in households that lost income in pandemic CNN

Regional 2020 Census News

Atlanta Region

View today's broadcast report for the Atlanta Region.

County's 2020 census response rate among lowest in the state

Donalsonville News [GA] – Staff Writer, July 30

Seminole County and most counties in Georgia are lagging in the count of the 2020 U.S. Census as outreach workers struggle to reach communities in isolated areas for counting amid the Coronavirus pandemic.

Opinion: Be counted in Census 2020, Alabama

WVTM-TV [AL] – Susana Schuler, July 30

affiliate (WROC-TV) interviewed Michael Cook about the upcoming NRFU operation. The Philadelphia Inquirer noted that census takers are going door-to-door to increase response rates in Philadelphia, quoting Fernando Armstrong who said the Census Bureau will look for all ways to reach households who have not yet responded. Rock Island, IL's NPR affiliate (WVIK-FM) quoted Marilyn Sanders who said census takers are working to close the gap in 2020 Census response rates, highlighting the impact on federal funding that is distributed to local communities based on census data. Denver's CBS affiliate (KCNC-TV) quoted Dennis Johnson emphasizing the importance of responding to the census now so a census taker doesn't have to visit your household

AMERICAN OVERSIGHT

Here's something everyone can do to have a significant impact that will last 10 years if not more: Complete the 2020 Census. Participating is required by law in all 50 states and the five US Territories. The data you provide will be used over the next decade to allocate federal funds for hospitals, schools, fire, police, roads and other critical infrastructure. Lack of participation could cost Alabama one of its seven US House of Representative seats.

Opinion: Fill out your Census, for Florida's sake

South Florida Sun Sentinel [FL] – Mark Adler, July 30

The Census gives a voice to every individual for federal funding of their communities and for fair civic representation. Florida Counts Census 2020 is a coalition of Florida nonprofit organizations, and we are alarmed at the weak self-response rates in Florida for the 2020 Census. We ask our national, state and local government officials to use your influence to help improve census response in your community.

Less than half county residents have responded to Census

The Augusta Chronicle [GA]— Carol McLeod, July 30

Jefferson County's response to Census 2020 is just less than 50 percent. The Census, which is good for 10 years, is the basis for much federal and state funding. Julianne Harper, the chair of the Census committee, said Georgia receives more than $2,000 per person per year until the Census is taken again, which will be in 2030.

during NRFU. Buffalo, NY's NBC affiliate (WGRZ-TV) interviewed Jeff Behler who talked about Buffalo's self-response rate (49.9%) and noted that this is the first decennial census where people are able to respond online or by phone. Sing Tao USA, U.S. China Press, Radio Korea, SinoVision, ZW TV, and an additional Sing Tao USA article quoted Census Bureau partnership specialists who spoke at separate press briefings to provide operational updates and provide reminders about the importance of the 2020 Census. Other Census Bureau spokespeople were quoted in the following regions: Chicago (Chicago), Los Angeles (Hawaii), Denver (Texas, Texas), and New York (New York, New York, New York).

Beltway & Other Online

AMERICAN OVERSIGHT

Monies received from federal and state sources include funding for services like hospitals and schools.

Chicago Region

View today's broadcast report for the Chicago Region.

Editorial: It's critical that everyone stand up and be counted

South Bend Tribune [IN] – Editorial Board, July 31

The coronavirus pandemic has forced adjustments in the way the census has been conducted. But one thing hasn't changed: the importance of getting an accurate count. Even in normal times, getting people to respond to the once-in-a-decade census is a challenge. The new normal has created additional complications, as noted in a recent Tribune report. The pandemic has delayed the census, which ordinarily would be wrapped up. Instead, it has been extended through Oct. 31.

Minnesota census workers reassure the undocumented as Trump memo renews fears

MinnPost [MN]— Tiffany Bui, July 30

Before Mónica Hurtado could persuade anyone to volunteer personal information for the 2020 census, she had to be persuaded herself. And three years ago, she was a big skeptic. "We know how deep is the distrust of BIPOC [Black, Indigenous and people of color] communities of big systems," said Hurtado, the racial justice and health equity organizer at Voices for Racial

News

Beltway & Other Online News Census director dodges legislators' questions about Trump memo on undocumented residents

Science Magazine – Jeffrey Mervis, July 30

Census Bureau Director Steven Dillingham spent 2 hours yesterday trying not to take sides in a fiercely partisan debate over how the 2020 U.S. census will be used to determine representation in the U.S. House of Representatives. He largely succeeded, but some Democrats worried the nation's largest statistical agency might pay a high price for his neutrality.

Multicultural News

3 Months to Census Deadline... Visits Begin Next Month

The Korea Times [CA] – Seok Han Hyung, July 29

AMERICAN OVERSIGHT

Justice.

Quad City Census Response Reaches over 60%

WVIK-FM [IL] – Marianna Bacallao, July 30

While over 60% of Illinois and Iowa residents have filled out the 2020 Census, there's still thousands who have not. Marilyn Sanders from the Regional Census Bureau says she's trying to close that gap by mailing reminders and knocking on doors.

Census Workers Starting to Canvas in Peoria

WCBU-FM [IL] – Joe Deacon, July 30

U.S. Census Bureau workers have started going door-to-door in the Peoria area to boost participation in the nationwide population count.

City Reveals Project to Boost Census Numbers

Lawndale News [IL] – Ashmar Mandou, July 30

The City unveiled a new civic engagement program designed to boost Census participation on Wednesday afternoon. Entitled “Boards of Change,” the project will host an array of events citywide, such as registering to vote, going to the polls, and engaging in public dialogue.

Mayors make bet on Census response rates

Texarkana Gazette [AR] – Karl Richter, July 30

The mayors of both Texarkanas challenged each other Tuesday to boost U.S. Census response rates, wagering a week's worth of wardrobe. Arkansas-side Mayor Allen Brown, Texas-side Mayor Bob Bruggeman and teams comprising members of the local Joint Census Committee

The 2020 Census response deadline is approaching and the U.S. Census Bureau will begin sending census enumerators to unresponsive households next month. This is an effort to collect accurate data which has been impeded by COVID-19 and is being now further impeded by President Trump's controversial order to exclude undocumented immigrants from being counted in redistricting. This is likely to cause more fear and avoidance to participate among the immigrant community. California has a large immigrant population, especially in the Los Angeles area, and with an already low participation rate, it is important to reach out to the immigrant population and increase their participation. California has also filed a lawsuit over this unconstitutional order.

AMERICAN OVERSIGHT

plan to push for more Census responses from residents.

Still time to complete 2020 census

WSAW-TV [WI] – Tony Langfellow, July 30

If you haven't completed the 2020 U.S. Census, the Census Bureau wants to remind everyone to complete it as soon as possible. On Thursday, July 30, the Census Bureau was stationed at Wausau City Hall for its "Wausau Count" event. The event helped provide those in Wausau an opportunity to get questions answered and to complete the survey.

Census workers begin door knocks Thursday

WRTV-TV [IN] – Kelsey Anderson, July 30

Just like everything else in 2020, the 2020 Census deadline was pushed back. Starting Thursday, census enumerators will be going door-to-door to reach out if you didn't mail back the form.

Denver Region

View today's broadcast report for the Denver Region.

Not Too Late to Avoid In-Person Census Visits

Public News Service [NE] – Eric Galatas, July 31

Census workers soon will be heading into Nebraska neighborhoods to ensure that people who have not yet responded to the 2020 census are counted in the once-a-decade tally mandated by the U.S. Constitution. Households can avoid in-person visits and save taxpayer dollars by filling out their form online at my2020census.gov.

The citizenship question is not included in the survey and how the Trump administration plans to move forward with their plan are unclear since questions about immigration status are not included in the census survey. The U.S. Census Bureau emphasizes the safety and security of personal information and encourages everyone to participate in order to achieve a full and accurate count.

Census is Postponed to End of October, New York's Response Rate Only Over 50%, Census Takers will Visit Unresponsive Starting from 8/11

SinoVision [NY] – Ruobing Li, July 28

A telephone press conference was held on Jul. 28, and an update of the next phase of the 2020 Census was announced, including the upcoming field operations of census

AMERICAN OVERSIGHT

2020 Census: The Effort To Reach The FLDS Community

KUER-FM [UT]– Lexi Peery, July 30

Almost 60% of Iron County residents have completed the U.S. Census, but according to census tract data, less than a quarter of the people in the eastern part of the county have done it. And that's where many Fundamentalist Church of Jesus Christ of Latter-day Saints now live, according to Iron County Commissioner Mike Bleak.

Census Bureau highlights Brighton-area school district in reminder to respond to census

Colorado Politics [CO] - Michael Karlik, July 30

The U.S. Census Bureau has pointed to 27J Schools in Brighton to illustrate how census response can affect planning for new K-12 facilities.

Want To Keep Census Workers From Knocking On Your Door? Fill Out The 2020 Census Now

KCNC-TV [CO] - Jennifer McRae, July 30

Census workers started going door-to-door in Denver, Arvada and other parts of the Denver metro area on Thursday. They're trying to ensure that everyone has filled out their 2020 Census.

Opinion: Want racial justice? Start with filing out your Census

Alamogordo Daily News [NM] - Suzanne McCormick, July 30

Those living in our nation's poor and minority takers in the local community. Chinese Partnership Specialist Robyn Yang emphasized the importance and urgency of responding to the 2020 Census. Ms. Yang emphasized that the 2020 Census data include citizens and non-citizens. From Aug. 11 to Oct. 31, census takers will knock on doors of households who have not completed the form. She added, "Personal information of the 2020 Census is confidential and protected by federal law. Your personal information can only be used to generate statistical data and cannot be used against you. Your census data is safe and reliable." Finally, she urged people to complete the form online, by phone or by mail. Language support includes Mandarin and Cantonese.

Census Takers Will Come in August. Have

AMERICAN OVERSIGHT

communities have historically gone undercounted in the U.S. Census. For instance, nearly one million Black Americans went uncounted nationwide in the 2010 Census. Fortunately, there's an easy step you can take that will go a long way towards ensuring everyone in our communities gets the representation and resources they deserve.

Marshall urges Kansans to complete Census

WIBW-TV [KS] – Sarah Motter, July 30

Congressman Roger Marshall is urging Kansans to complete the 2020 Census. Congressman Roger Marshall says the Census impacts the number of funding communities receive, how they plan and how representation is determined at State and Federal Levels. "The Census is a small way for Kansans, no matter where they live, to have a big impact in their community," said U.S. Congressman Roger Marshall, M.D.

Crews hit the streets in Loveland to fill gaps in 2020 census

Loveland Reporter-Herald [TX] - Max Levy, July 30

Census workers started field operations on Thursday, visiting Loveland households that had not yet shared information for the nation's 2020 census.

Deadline to fill out U.S. Census extended to October 31

Tyler Morning Telegraph [TX] – Taylor Miller, July 30

You Responded to the Questionnaire?

ZW TV [CA] – N/A, July 28

Due to the impact of the epidemic, the 2020 Census was extended through October. Census takers will also visit households who have not yet filled out the questionnaire beginning August. The U.S. Constitution stipulates a decennial census held every ten years in the country. The data will affect the distribution of federal funds, public facilities, etc. Anyone living in the United States must fill it out! Partnership Specialist April Kuan also gave operational updates and urged people to complete the 2020 Census online, by phone or by mail. She emphasized that the 2020 Census data includes citizens and non-citizens.

The Response Rate of

AMERICAN OVERSIGHT

The city of Tyler has reached a 57.5% response rate to the 2020 Census, compared to 2010's 66.1% response rate. Tyler residents however are in luck, as the deadline to complete the census has been extended to October 31 due to the COVID-19 pandemic.

Dodge County sees strong census self-response rate

Fremont Tribune [NE] – Noah Johnson, July 30

Dodge County continues to put up strong self-response numbers as the 2020 Census nears the end of its self-response period. The county has experienced a 66.8% self-response rate throughout the period, according to David Drozd, research coordinator for the Center for Public Affairs Research at the University of Nebraska Omaha.

Los Angeles Region

View today's broadcast report for the Los Angeles Region.

Census Bureau visiting non-responding households in Whatcom County this week

The Bellingham Herald [WA] – Mack Ervin, July 30

If you haven't filled out the 2020 Census yet, you may be visited very soon.

Census takers will start doing follow-up visits with non-responding households on Thursday, July 30, according to the U.S. Census Bureau. The response rate for houses in Whatcom County is 69%, higher than the average response rate for Washington state, at 67.7%,

the Chinese Community is Low, the Census Bureau Urges to Fill out the Form as Soon as Possible

Sing Tao USA [NY] – Jingran Zhou, July 28

The U.S. Census Bureau shared the latest 2020 Census updates to the Chinese media yesterday. The response rate of the Chinese communities in New York City, New Jersey and Boston is low. It is hoped that the Chinese community will fill out their forms as soon as possible, and the Census Bureau is currently recruiting Chinese bilingual part-time jobs in preparation for home visits beginning Aug. 11. Due to the impact of COVID-19, the 2020 Census has been delayed. The original deadline of Jul. 31 was extended to Oct. 31. The Census Bureau is making the best effort to ensure a complete count of the U.S.

AMERICAN OVERSIGHT

and the country, at 62.3%.

Santa Clara County To Place Census Kiosks At COVID-19 Testing Sites

KPIX-TV [CA] – Staff Writer, July 30

Santa Clara County announced on Wednesday that it will set up Census 2020 kiosks at pop-up COVID-19 testing sites to mitigate the effects of President Donald Trump's claim that he will exclude undocumented immigrants from the counts used in congressional redistricting. The kiosks are part of a larger effort to ensure that all county residents are counted and will provide tablets for people waiting to get tested to fill out the census on the spot.

65.2% of Pasadenans Have Responded to the 2020 Census

Pasadena Now [CA] – Brian Day, June 30

With the 2020 census season more than halfway through, Pasadena officials are urging local residents to make sure they are counted in order to make sure the city and state get their fair share of tax revenue, as well as prevent the state from losing one or more congressional seats for the first time in history.

Hawaii below national average when it comes to participation in the US Census

KITV-TV [HI] – Nicole Tam, July 30

The state of Hawaii is below the national average when it comes to participation in the U.S. Census. On Oahu, it's above average. To help raise the numbers on all islands, the Hawaii Census Team wants low-response areas better

population. During the conference call, Lewis Liu, a partnership specialist with the Census Bureau, said that the law requires the Census Bureau to protect the census data and keep them strictly confidential. The data will be used to allocate the federal funding and the congressional redistricting. He urges people to complete online or by phone as soon as possible.

How the Census Bureau is reaching historically hard-to-count communities for the 2020 Census

La Raza – Staff Writer, July 28

The Census Bureau has been making extraordinary efforts to reach people who are historically undercounted such as immigrants, children under the age of five, black/African American, American Indians, and

AMERICAN OVERSIGHT

educated in-person and online. Results of the census determines how much money the state receives from $675 billion of federal funding over the next 10 years.

New York Region

View today's broadcast report for the New York Region.

Door to door census to begin

WROC-TV [NY] – Staff Writer, July 31

Census data collectors could be coming to your home this summer. More money has been given to the census bureau to help them spread the word about the nationwide survey. Originally, data collectors would have been knocking on your door by April, but field collection was halted because of the pandemic. But now things are picking back up. At a press conference outside the Rebecca Johnson Elementary School, Galvin and Mayor Domenic J. Sarno were among officials urging all residents to be counted in the census, saying it is necessary for the city to receive its full and fair allotment of federal funds and representation.

Springfield launches door-to-door campaign to boost census response

MassLive [MA] – Peter Goonan, July 30

City and state officials, including Secretary of the Commonwealth William F. Galvin, launched a door-to-door campaign on Thursday aimed at the "critical" task of boosting the response to the 2020 census.

Alaska Natives.

Lag in census participation in Hispanic areas generates concerns

La Raza – Araceli Martinez Ortega, July 27

The difficulties brought by the coronavirus pandemic, coupled with the interference of the Trump administration, have caused a lag in filling out the 2020 Census questionnaire in Latino areas across the country.

Census Week of Action kicks off to boost New Yorkers' participation in the 2020 Census

Univision [NY], July 27

The New York Census Bureau hired 35,000 people to visit households that have not completed the questionnaire, as only 53% of habitants have responded. Different activities will be held this week to motivate participation and inform

AMERICAN OVERSIGHT

'Let me be clear: The president's directive is unconstitutional': Maloney denounces Trump's memo to redraw congressional districts

New York Daily News [NY] – Michael McAuliff, July 30

The director of the U.S. Census did little to reassure Democrats that President Trump is not trying to manipulate America's population count for political benefit. Oversight Committee Chairwoman Rep. Carolyn Maloney (D-N.Y.) called an emergency hearing on the decennial count after Trump released a memo saying he would exclude undocumented immigrants when the numbers are crunched to carve out new congressional districts.

Jersey City ramps up 2020 census efforts

WPIX-TV [NY] – Andrew Ramos, July 30

In the 2010 census, Jersey City was among the most under-counted cities in the nation. In an effort to avoid that from happening again. officials there hit the ground running Thursday, urging residents to get counted.

Buffalo has 49.9% self-response rate so far in 2020 Census

WGRZ-TV [NY] – Kelly Dudzik, July 30

The 2020 Census is going on right now, and there are many ways you can respond if you haven't already. On Thursday, 2 On Your Side's Kelly Dudzik spoke with the New York Regional Director of the U.S. Census Bureau, Jeff Behler, to get answers to some common questions about the census.

the community about the process.

2020 Census: Not Too Late to Reply! U.S. Census Bureau Encourages Local Communities to Actively Respond

U.S. China Press [CO] – N/A, July 27

A telephone press conference was held on Jul. 24. An update of the next phase of the 2020 Census was announced, including upcoming field operations regarding census takers in the local community. The Census Bureau also highlighted the response rates in the Denver region, which spans Texas, Arizona, Colorado, New Mexico, Utah, Oklahoma, Kansas, Nebraska, South Dakota, North Dakota, Montana, and Wyoming. Partnership Specialist Debbie Lee emphasized the importance and urgency of responding to the 2020 Census. "Everyone

AMERICAN OVERSIGHT

Albany falls behind on 2020 census reporting, Mayor Sheehan pushes for complete count

WTEN-TV [NY] – Mikhaela Singleton, July 30

Albany is trailing behind the nation on filling out the census. There's about 100,000 people living in Albany, but around half of households haven't yet been counted in this year's census.

Reminder: respond and be counted in 2020 Census

WWNY-TV [NY] – Katie Benoit, July 30

Officials are reminding north country residents to respond and be counted in the 2020 U.S. Census. Whether it's on paper, online, or on the phone, U.S. Census officials want you to fill out the 2020 Census.

Brooklyn Trails Other Boroughs In 2020 U.S. Census Response: Data

Patch [NY] – Anna Quinn, July 30

Officials are urging Brooklynites to complete the 2020 U.S. Census as the borough trails the rest of New York City in filling out the essential form. Only 51.4 percent of households in Kings County had filled out the Census as of Thursday, compared to 58.3 percent of households across New York State and nearly 63 percent nationally, according to data from the U.S. Census Bureau.

Officials share census message for military families: 'You count here'

The Day [CT] – Kimberly Drelich, July 30

Lt. Gov. Susan Bysiewicz said census workers are beginning to knock on doors of homes that

knows that the 2020 census is still in progress. We must count everyone living in the United States. This includes citizens and non-citizens, infants, adults, the elderly, and everyone living in the same household. The 2020 Census responses are important for our community." Ms. Lee also said, "A very important point: If you do not respond to the 2020 Census as soon as possible, your community may miss out on annual federal funding for the next 10 years. Your response is very important. Every uncounted person will make the community lose important funding every year." In addition to providing important field operation announcements, Ms. Lee also answered various common questions about who should be counted, census takers, and

AMERICAN OVERSIGHT

have not yet responded to the census. At the end of last week, census enumerators, wearing badges, messenger bags with the census logo, and personal protective equipment started in Hartford, Tolland, Windham, and New London counties.

Minorities risk being underrepresented in the 2020 census

NJTV-TV [NJ] – Raven Santana, July 30

After a 4-month delay, census workers started knocking on doors to remind Jersey City residents to fill out the form that comes every 10-years so New Jersey can get its fair share of federal funding. While most people in New Jersey are filling out their census, state leaders say the people who need it the most aren't.

Reminder: respond and be counted in 2020 Census

WWNY-TV [NY] – Katie Benoit, July 30

Officials are reminding north country residents to respond and be counted in the 2020 U.S. Census.

Whether it's on paper, online, or on the phone, U.S. Census officials want you to fill out the 2020 Census. "There's still time to self respond. It's not to late," said Lisa Moore, assistant regional Census manager.

Philadelphia Region

View today's broadcast report for the Philadelphia Region.

2020 Census efforts are targeting Philadelphia COVID-19 safety measures.

Encouraging Census Participation, 13 Million Fortune Cookies Sent to Merchants in Chinatown

World Journal [NY] – Cheng Zhang, July 27

Thirteen million fortune cookies containing a message to encourage 2020 Census participation were sent to Chinese restaurants in Chinatown on Jul. 27. The slogan, "Don't be left out, you matter" was printed in each fortune cookie. These days, the hot food delivery industry and outdoor restaurants are stimulating the Chinese food industry and sending information to more New Yorkers throughout this industry. Within 100 days before the end of the 2020 Census, everyone can take five minutes to receive a funding of $1,000.

Caravan of Vehicles to

AMERICAN OVERSIGHT

area households that haven't responded

The Philadelphia Inquirer [PA] – Michaelle Bond, July 30

On Saturday, a caravan of about 20 cars and some bikes will travel through North and West Philadelphia — specifically Strawberry Mansion, Mantua, and Belmont — playing music and encouraging participation in the 2020 Census in neighborhoods that the Census Bureau has historically undercounted and that are trailing in responses.

Richmond census response rate falls behind National average

WTVR-TV [VA] – Vernon Freeman Jr., July 30

The Virginia Census response rate has surpassed the National rate, but the numbers in the City of Richmond tell a different story. As of July 19, Richmond has a current self-response rate of 57.2%, falling below the state rate at 66.9% and the national rate of 62.1%, according to the U.S. Census Bureau.

Worester County Census Participation On Target

The Dispatch [MD] - Charlene Sharpe, July 30

Local participation in the 2020 Census is expected to be on target with response rates from previous years. Officials said this week Worcester County's response rates were near what they were in 2010. Kelly Henry, coordinator of Worcester County's Complete Count Committee, said people have until Oct. 31, 2020, to complete their survey.

Encourage People to Respond to 2020 Census

Vien Dong Daily [CA] – Thanh Phong, July 27

Every 10 years the Census Bureau will conduct a census count of the population in the U.S. and five U.S. territories. Due to COVID 19, 2020 Census operations and efforts to collect census data have been difficult. So local officials, community leaders, and volunteers came together to coordinate a parade to drive through the City of Garden Grove and Stanton to encourage everyone to respond to the 2020 Census. The parade started at 1 p.m. on Jun. 24 in the City of Stanton. The parade drove through the areas with low response rates with speakers with a message to encourage everyone to respond to the 2020 Census questionnaire in three languages, English,

AMERICAN OVERSIGHT

Northern Kentucky's Dari-Crest Giving Away Foot-Longs and Ice Cream to Anyone Who Fills Out the Census

City Beat [OH] – Staff Writer, July 30

A Northern Kentucky city is once again bribing its citizens to fill out their Census form. Last time, Newport was giving away $50 gift cards to anyone who could prove they completed their Census. This time, the Covington Census Committee is heading to Dari-Crest Ice Cream in Latonia to give away swag bags and tasty treats to those who fill out their Census form on Friday night.

Vietnamese and Spanish. Everyone can still respond to the census online at www.2020census.gov or call the Vietnamese helpline at 844-461-2020.

Trump's order affects census in California, Florida, and Texas

Azteca – Ju Carpy, July 26

If President Donald Trump succeeds in excluding undocumented immigrants living in the United States from being counted to redefine the districts of the U.S. House of Representatives, California, Florida, and Texas will end up with one less congressional seat each if not every resident is counted, according to an analysis performed by a group of experts.

Trump sued for memorandum excluding undocumented from

AMERICAN OVERSIGHT

census

Telemundo 47 [NY] – Staff Writer, July 24

On Friday, a coalition of states, counties, and cities filed a federal lawsuit against President Donald Trump for his memorandum that bans undocumented immigrants from the process of drawing congressional districts.

Households will receive a final reminder to respond to the census before the rollout of census takers visits begins

La Raza – Staff Writer, July 24

The United States Census Bureau will send reminder postcards this week to about 34.3 million households. This will be the final reminder before census takers begin visiting homes that have not responded by mid-August. Responding now minimizes the need for

AMERICAN OVERSIGHT

census takers to visit households to collect responses in person.

Census Bureau Sending Out the Last Reminder

Nguoi Viet [DC] – N/A, July 24

The Census Bureau is sending the last reminder to about 34.3 million households this coming week. The letter is to remind everyone to respond to the 2020 Census to avoid a census enumerator visit and conserve everyone's time. According to 2020 Census response rates, more than 92 households, equivalent to 62.3% have responded online, by phone or mail. The Census Bureau strongly encourages everyone to respond on the census website www.2020census.gov, by phone offered in 12 different languages, or just submit questionnaires sent out to households in March.

AMERICAN OVERSIGHT

[2020 Census Launches MQA Project]

Sing Tao USA [MA] – N/A, July 24

Between Jul. 13 and Sept. 18, more than 3,000 Census Bureau employees will begin to visit communities with the lowest 2020 Census response rates to encourage and assist residents to complete the 2020 Census on their own. This operation, called the Mobile Questionnaire Assistance program (MQA), is different from the census takers who will visit families that have not responded. The Census Bureau will conduct a nationwide Non-Response Follow Up (NRFU) beginning Aug. 11. Before this follow-up operation, MQA is the last effort to encourage residents to complete the 2020 Census questionnaire.

[2020 Census Needs Korean Participation]

AMERICAN OVERSIGHT

Radio Korea [PHL] – Hwang Lee, July 23

In a telephone media conference on Jul. 23, the U.S. Census Bureau encouraged the Korean community to participate in the 2020 Census. Partnership Specialist Jiyun Back emphasized the safety and security of participating in the 2020 Census and reminded Koreans of the importance of participation to directly impact the Korean community. Language support services in Korean can also be found for those in need. The 2020 Census deadline has been extended to Oct. 31 and census enumerators will begin visiting homes Aug. 11. They will follow all health guidelines and practice social distancing.

Census Media Conference Call: 10 Minutes Can Bring $18,000 Funding

AMERICAN OVERSIGHT

Sing Tao USA [MA] – Qiang Li, July 23

On Jul. 23, a 2020 Census Chinese media conference call was successfully held. Officials of the Census Bureau shared the progress of the 2020 Census and Chinese media representatives shared the various measures taken to encourage the Chinese community in the eastern U.S. to participate in the 2020 Census. Huichun Chang, a Chinese Partnership Specialist of the U.S. Census Bureau, gave detailed operational updates in Mandarin during the conference call. (Note: This story was also reported by Washington Chinese Daily News in Simplified in Traditional Mandarin, Bostonese, and Southern Chinese Daily.)

Census Bureau Announcement: Today U.S. Population has

AMERICAN OVERSIGHT

Reached 330 Million

World Journal [CA] – N/A, July 23

The U.S. Census Bureau today provided population estimates and predicted that as of 8:02 a.m. Eastern Daylight Time on Jul. 23, the U.S. population has reached a new milestone: 330 million people. The clock shows a net increase of one person every 16 seconds.

The 2020 Census Chicago Response Rate 54.8%; U.S. Census Bureau Encourages Local Communities to Respond

Chicago Chinese Times [IL] – N/A, July 22

The U.S. Census Bureau held a Chinese media phone briefing on Jul. 17. At the meeting, a Chinese representative of the Census Bureau provided operational updates for the next phase of the 2020 Census and encouraged

AMERICAN OVERSIGHT

completion of the 2020 Census form online or by phone before Aug. 11. Wendy Yang, a Mandarin spokesperson with the Census Bureau, said that the U.S. federal government allocates 675 billion U.S. dollars each year according to the population. Wendy Yang also emphasized that the Census Bureau will send census takers to each community from Aug. 11 to Oct. 31 to knock on doors of households who have not yet completed the 2020 Census questionnaire. All Americans need to be counted in the census. This Chinese media briefing was hosted by the Y&R team. Edward Chang, the managing director of TDW+Co, the official 2020 Census advertising partner of the Asian American community, said at the meeting that, "Oct. 31 will be the last day that our community can be counted. This statistic is

AMERICAN OVERSIGHT

very important, because the data will determine the funding in your community for the next 10 years and the number of public representatives. Whether the community can receive a fair distribution depends on the census data."

USA: Uncertainty after order to exclude undocumented immigrants from the 2020 Census

VOA Noticias – Celia Mendoza, July 22

The 2020 Census will determine the new redistribution of the congressional districts of the United States, which are representative of the population. However, President Donald Trump's most recent action around those who should not be counted is creating controversy.

A public effort begins to boost 2020 Census participation

AMERICAN OVERSIGHT

Minnesota de Hoy [MN] – Staff Writer, July 22

More than 3,000 U.S. Census Bureau staff members will start visiting the communities with the lowest response rates to encourage and assist people to respond to the 2020 Census.

Census takers begin home visits today in select areas that have not yet responded to the census

La Raza – Staff Writer, July 22

The United States Census Bureau announced that it will start to follow up with households in selected areas that have not yet responded to the 2020 Census.

About Census Daily News Digest

Census media monitoring is a daily compendium of articles about the Census Bureau and a representative sampling of the most important and relevant news coverage and commentary. Opinions expressed above do not belong to the Census Bureau, or its staff. English translations, in summary form, have

AMERICAN OVERSIGHT

been provided for all in-language articles included in this report.

This is an official email from the U.S. Census Bureau. If you have any questions or comments, please contact us (http://www.census.gov/about/contact-us.html).

AMERICAN OVERSIGHT

MEMORANDUM OF AGREEMENT

BETWEEN

THE U.S. CENSUS BUREAU

AND

THE SOCIAL SECURITY ADMINISTRATION (SSA)

ESTABLISHING A JOINT STATISTICAL PROJECT

CONCERNING LINKAGES OF HOUSEHOLD SURVEY DATA

AND SSA PROGRAM DATA

I. PURPOSE

This agreement sets forth the terms and conditions between the Department of Commerce, U.S. Census Bureau (Census Bureau) and SSA, under which SSA program data will be linked to survey respondents' data to support research of mutual benefit for SSA and the Census Bureau.

II. PROPOSED RESEARCH

Under this agreement, the Census Bureau and SSA will link survey files to SSA program data. The linked files will be used by the agencies to conduct research that will benefit both agencies. Attachment 1 provides additional information on the approved research projects. Linking SSA and Census data combines the completeness and accuracy of SSA program records with the range and scope of survey results, maximizing the strengths and minimizing the limitations associated with each.

Linking Census survey data and SSA program records also significantly expands research opportunities beyond those provided by either source alone. Census survey information provides detailed background information on demographic, income, self-reported health status, and other characteristics of Social Security program participants and nonparticipants. SSA program records supplement this information by providing individuals' lifetime work and earnings histories, as well as accurate Social Security program participation histories. Researchers at both agencies will use matched data to study work and earnings dynamics of survey respondents before, during, and after their

AMERICAN OVERSIGHT

interviews. Furthermore, the linked survey data allow for the construction of detailed profiles of individual and family characteristics at the time of program participation, as well as detailed information related to program dynamics.

III. BACKGROUND

One of the most successful undertakings between SSA and the Census Bureau has been the frequent linkage of the Census Bureau's household survey data from the Survey of Income and Program Participation (SIPP) and the Current Population Survey Annual Social and Economic Supplement (CPS ASEC) with extracts from various SSA program files. Both agencies recognize that research, to date, linking the SIPP and CPS ASEC data with SSA program data has been of exceptional value in meeting their respective agency goals. The Census Bureau's American Community Survey (ACS) has also been linked to SSA program file extracts on a sporadic basis. This agreement (1) describes the terms by which the agencies will share data and create linked survey-program records files, (2) explains how the linked files will be used for approved research projects, and (3) states the terms and conditions for approval and execution of new projects.

This project is necessary and essential to further the mission of Census in that it will use these linked data to improve the quality of demographic surveys that it conducts. SSA will benefit from the joint research through greater understanding of its programs and beneficiaries. Census has determined that this project cannot be done without the participation of the Social Security Administration because without the information on program participation and benefits from SSA program records, analysts at both agencies would be unable to correct misreported values in survey files, a necessity that yields more accurate underlying data and improves statistical estimates.

IV. LEGAL AUTHORITY

SSA's legal authority for this agreement is 42 U.S.C. §§ 405(r)(5) and 1306, 5 U.S.C. § 552a(b)(4), and 20 C.F.R. § 401.185(a).

SSA is further authorized to disclose federal tax information (FTI) under 26 U.S.C. §§ 6103(j)(1), 6103(p)(2)(B); 26 C.F.R. §§ 301.6103(j)(1)-1, 301.6103(p)(2)(B)-1; and two letters dated January 16, 2008, and June 13, 2013, from the Internal Revenue Service (IRS) authorizing SSA to disclose limited FTI to the Census Bureau (see Attachments 2 and 3) for the purposes described in 26 C.F.R. § 301.6103(j)(1)-1(b)(5).

The Census Bureau's legal authority for this agreement is 13 U.S.C. §§ 6 and 8(b).

V. DESCRIPTION OF DATA INVOLVED

AMERICAN OVERSIGHT

1. For purposes of this linking project, SSA will provide the Census Bureau with access to and use of certain individual-level records from or derived from the following Systems of Records:

   - Earnings Record and Self-Employment Income System (also known as the Master Earnings File (MEF)), (System Number 60-0059). This file contains Federal Tax Information (FTI) maintained by SSA, both summary and detailed parts. SSA will only disclose MEF data as authorized by the IRS (see Attachments 2 and 3);
   - Master Beneficiary Record (MBR) (System Number 60-0090);
   - Supplemental Security Income Record and Special Veterans Benefits (SSR) (System Number 60-0103);
   - National Disability Determination Services (NDDSS) File (System Number 60-0044);
   - Master Files of Social Security Number (SSN) Holders and SSN Applications (also known as the NUMIDENT), (System Number 60-0058);
   - Completed Determination Record – Continuing Disability Determinations (System Number 60-0050);
   - Vocational Rehabilitation Reimbursement Case Processing System, SSA (System Number 60-0221); and
   - Ticket-to-Work and Self-Sufficiency Program Payment Database (System Number 60-0295).

   SSA will only release the minimum amount of data that is relevant and necessary for the work described under this agreement. Further, SSA will not disclose drug and alcohol records or other data that is legally restricted, or data that SSA determines to be sensitive or proprietary in nature, from any system of records.

   The matched files created under this agreement, to the extent they are maintained by SSA, are covered by SSA System of Records Notice Number 60-0148, Matches of Internal Revenue Service and SSA Data with Census Survey Data (Joint SSA/Census Statistics Development Project).

2. The Census Bureau will match the following surveys to SSA data:

   - SIPP panels from 1984, 1990-1996, 2001-2008, 2014 (Waves 1-4 and SSA supplement), 2018 (waves 1-2) and field tests for the redesigned SIPP
   - CPS ASEC 1973, 1991, 1994, 1996-2018

AMERICAN OVERSIGHT

- ACS 2001

The Census Bureau survey data from the SIPP and CPS ASEC are covered by System Number Commerce/Census-3, Special Censuses, Surveys, and Other Studies. Data from the ACS are covered by System Number Commerce/Census-5, Decennial Census Program. Once SSA data are transmitted to the Census Bureau, these data become part of the Privacy Act System, Commerce/Census-8, Statistical Administrative Records System, and, as such, are subject to all requirements and conditions of the Privacy Act. SSA retains no Census Bureau data under this agreement.

VI. SCOPE OF WORK

This agreement covers four activities: (1) constructing linked research data files; (2) conducting approved research projects using the linked files; (3) proposing and reviewing new projects using the linked research data files; and (4) reporting responsibilities.

1. Activities to construct linked research data files for approved projects, to be repeated on roughly an annual basis:

   a. The Census Bureau will process household survey person records through the Person Identification Validation System (PVS) to search for and append validated SSNs.

   b. The Census Bureau will provide SSA with the master list of SSNs and the matching public use survey identifiers (PUIDs), through a secure connection, for SSA's use in extracting data from its program databases and linking to survey public use files by SSA researchers.

   c. Subject to the limitations in Section V.1 of this agreement, SSA will append program data described in Attachment 4 to Census-provided finder files. The finder files may contain SSNs for two types of records: (1) new survey records that have never been provided to SSA before, and (2) historical records from previously-conducted surveys that were already provided to SSA in earlier exchanges. SSA will append program data regardless of the type of finder file records. The SSA-appended file will be returned to the Census Bureau by secure connection.

   d. The Census Bureau will replace SSNs with Protected Identification Keys (PIK). The Census Bureau will ensure that the resulting data files will contain only SSA program data described in Attachment 4, survey household and person identifiers, and PIKs.

   e. Subject to the restrictions in this agreement, the Census Bureau will provide PIK versions of the survey data and associated SSA program records to employees, agents, and researchers who have obtained Special Sworn Status (SSS) under

AMERICAN OVERSIGHT

13 U.S.C. § 23(c) and are supporting approved research projects listed in Attachment 1.

2. Conducting approved joint research projects using the linked files:

   a. Data provided under this agreement are to be used only for Census Bureau and SSA-approved statistical purposes. Approved uses of these data are described in Attachment 1. Additional uses of these data may be proposed through written requests as set forth in Section VI.3 below. Additional approved uses of the data will be considered approved projects under Attachment 1, and subject to all terms of this agreement.

   b. Approved joint research projects using the Census Bureau survey-SSA linked data may be conducted using approved methods to access sensitive data at the work locations listed below. Census Bureau employees will not come to SSA locations.

      i. Census Bureau (Headquarters and Research Data Center (RDC) locations)

      ii. SSA E. Street

      iii. SSA Baltimore

      iv. SSA Virginia Avenue

   c. All research output (for example, statistical estimates) produced from the Census Bureau and SSA joint projects must be reviewed by a Disclosure Review Board (Attachment 5).

   d. Unless required by law, release of any data derived from or based on data from the linked survey-SSA data to anyone not authorized access to such data under this agreement is subject to the written approval of the Associate Commissioner of the Office of Research, Evaluation, and Statistics (ORES). All requests for approval must be sent in writing to SSA's Project Coordinator. If release of data derived from or based on data from the linked survey-SSA data is required by law, the Census Bureau must notify SSA of the data to be disclosed and legal requirement for the disclosure at least 24 hours before the data is disclosed.

3. Activities to propose new projects using research data files:

   In addition to the projects listed in Attachment 1, the parties anticipate the need to conduct additional research projects using the linked files.

   a. The Census Bureau will propose new internal (projects by Census employees) or joint (Census-SSA projects with an approved Title 13 purpose) research projects

AMERICAN OVERSIGHT

using the linked data through the Data Management System (DMS). DMS is the Census Bureau's tool for tracking and reporting on all research projects.

b. SSA will propose new joint research projects using the linked data through the SSA Project Coordinator listed in this agreement. Projects will be requested through the Census Bureau's DMS, and will only be approved if the work provides Title 13 benefits. For each joint project, SSA's Project Coordinator will be responsible for providing required updates to the Census Project Coordinator. These updates include, at minimum, project staffing, progress, and findings.

c. Written requests by the Census Bureau or SSA for additional uses of the survey-SSA linked data must include:

   i. a description of the proposed use,

   ii. the Title 13 benefits to the Census Bureau,

   iii. the location of work,

   iv. the files to be linked,

   v. the specific individuals who will be involved in the research and their relationship to the Census Bureau (e.g., employee),

   vi. the name and expiration of SSS for each researcher, if applicable,

   vii. the timeline for the proposed research, and

   viii. intended project outputs.

d. For all new projects proposed by the Census Bureau or SSA, the Census Bureau Project Coordinator listed in this agreement must obtain approvals from the following Census Bureau officials/offices: Division Chief, Data Owners (including, at minimum, the survey Data Owner and SSA), Information Technology (IT) Security, and the Policy Office.

e. If a proposed new project is approved by both parties, the Census Bureau and SSA will modify this agreement to add the new projects. The only officials who may approve a modification to this agreement to add projects, subsequent to a determination by each agency that the newly proposed projects are appropriately beneficial to both agencies and legally permissible, are those officials with proper authority to sign this agreement pursuant to each agency's delegations of authority and policy. Each new project is subject to the terms and conditions of this agreement and must be added to the agreement under Attachment 1 through a signed modification.

AMERICAN OVERSIGHT

f. No work will begin on new projects until both parties have signed a modification to this agreement adding the new project.

g. All researchers on approved projects who are not Census Bureau employees must obtain SSS and complete all required training before the researcher begins work on the project.

4. Reporting responsibilities for SSA and Census Bureau:

a. Real-time Reporting: Each agency must communicate to the other's agreement Project Coordinator updates or changes of any approved researchers as they occur. Researchers who separate from the project or agency will have their computer access to linked data terminated within 24 hours of the separation notice.

b. Quarterly Reporting: Each agency must communicate to the other's agreement Project Coordinator, on a quarterly basis, updates to project scope, including new research outputs produced through existing, approved projects. Each agency will provide a list of abstracts, conference papers or presentations, and reports or manuscripts using the linked data to the SSA and Census Bureau agreement Project Coordinators, respectively, each quarter.

c. Annual Reporting: A project status report, confirming that work within the scope of the project needs to continue and that researchers engaged in the project are accurate, will be communicated between the SSA and Census Bureau agreement Project Coordinators by September 30 each year this agreement is in effect.

A. <u>SSA Responsibilities</u>

1. For the purpose of constructing linked research data files for approved projects, subject to the limitations in Section V.1 of this agreement, SSA will provide to the Census Bureau the data fields listed in Attachment 4 for survey records submitted by the Census Bureau.

2. When projects are added to this agreement, SSA will provide additional data as described in the new project description added to Attachment 1.

3. With each data delivery, SSA will send record count, file contents/layout, and data dictionaries for the data being delivered to the Census Bureau Project Coordinator. Any questions concerning the documentation will be addressed by the SSA Project Coordinator of this agreement.

4. SSA will submit written requests to the Census Bureau for additional projects or data file linkages not specified in this agreement that SSA wishes to undertake as described in Section VI.3 of this agreement.

5. SSA will comply with reporting requirements described in Section VI.4 of this agreement.

AMERICAN OVERSIGHT

6. SSA will review and respond to, in writing, any written requests submitted by the Census Bureau for additional projects or data file linkages not specified in this agreement that the Census Bureau wishes to undertake within 30 days of receipt of the Census Bureau's request. The 30-day period applies only to SSA review of new projects for approval purposes, and does not apply to formally modifying the agreement, which is expected to take longer than 30 days. Written requests must be submitted to SSA in accordance with Section VI.3 of this agreement. SSA will only approve such additional data file linkages to the extent the data file linkage provides a benefit to SSA.

7. SSA will complete an agreement modification for each new project added under this agreement as described in Section VI.3 of this agreement.

B. Census Bureau Responsibilities

1. The Census Bureau will transmit finder files of survey SSNs and the matching PUIDs to SSA for data matching and, upon matched data returning to the Census Bureau, replace SSNs with PIKs to facilitate matching to survey content and other administrative records (as approved).

2. The Census Bureau will ensure all survey-SSA matched data acquired under this agreement may only be accessed and used at the Census Bureau's Headquarters and RDCs, by Census Bureau employees, agents, and SSS researchers, for projects approved under this agreement, as described in Sections V and VI of this agreement. A list of approved projects is incorporated herein as Attachment 1 to this agreement.

3. The Census Bureau will submit written requests to SSA for additional projects or data file linkages not specified in this agreement that the Census Bureau wishes to undertake as described in Section VI.3 of this agreement.

4. The Census Bureau will comply with reporting requirements described in Section VI.4.

5. The Census Bureau will review and respond to, in writing, any written requests submitted by SSA for additional projects or data file linkages not specified in this agreement that SSA wishes to undertake within 30 days of receipt of SSA's request. The 30-day period applies only to Census Bureau review of new projects for approval purposes, and does not apply to formally modifying the agreement, which is expected to take longer than 30 days. Written requests must be submitted to the Census Bureau in accordance with Section VI.3 of this agreement.

6. The Census Bureau will complete an agreement modification under this agreement as described in Section VI.3 of this agreement.

AMERICAN OVERSIGHT

VII. DATA SECURITY & SAFEGUARDS

The parties will comply with limitations on use, treatment, and safeguarding of data under the Privacy Act of 1974 (5 U.S.C. § 552a), related Office of Management and Budget guidelines, the Federal Information Security Management Act of 2002 (44 U.S.C. § 3541, et seq.), and related National Institute of Standards and Technology guidelines.

A. Data Management and Authorization for Access and Use

The Census Bureau will restrict access to and use of all information obtained from SSA under this agreement, and any records derived from SSA's information, to only those authorized employees, agents, and SSS researchers who need it in connection with the approved research described in this agreement.

B. Records Transport/Electronic Transmission

Because the transport of Census Bureau data to SSA, and SSA data to the Census Bureau, involves a connection between the parties, an Interconnection Security Agreement, which details the technical solution on how the interconnection will be established, is required prior to the transport of data.

C. Ownership of Data

Title to and ownership of all SSA data transferred under this agreement will reside with SSA. Title to and ownership of all Census Bureau survey data will reside with the Census Bureau.

D. Data Custodian

The Census Bureau's Data Custodian for this agreement is Trent Alexander, Assistant Center Chief for Research Support, (301) 763-9810.

SSA's Data Custodian for this agreement is Sirisha Anne, Office of Retirement and Disability Policy, Office of Research, Evaluation, and Statistics, Office of Data Development, (410) 966-1785.

The data custodians are responsible for safeguarding all data provided and information derived under this agreement (including verification results), ensuring that the Census Bureau and SSA observe all conditions of use set forth under this agreement, and establishing and maintaining security arrangements that will safeguard Census Bureau and SSA information from loss and unauthorized use. If, for any reason, the Census Bureau or SSA finds it necessary to change custodians, then it must give the other agency written notification within 30 days of the change, including the effective date of such change. In addition, upon either agency's written request, the Census

AMERICAN OVERSIGHT

Bureau or SSA must take the following actions: (1) make a complete accounting of all projects and individuals with access to data provided under the terms of this agreement; and (2) provide this accounting to the requesting agency within 30 days of the written request.

E. Disclosure

1. The parties acknowledge that an unauthorized disclosure of the information provided under this agreement may violate 13 U.S.C. § 9; 42 U.S.C. § 1306; 5 U.S.C. § 552a; and other applicable law. In the event of inconsistency, the parties agree that the most restrictive provisions of these statutes will apply in determining what constitutes an unauthorized disclosure.

2. The penalties stipulated for wrongful disclosure in 13 U.S.C. § 214, 42 U.S.C. § 1306, 5 U.S.C. § 552a, and other applicable law may include imprisonment for up to 5 years, a fine, or both.

3. SSA and the Census Bureau will inform all of its employees or agents granted access to this information that the release and disclosure of the information may subject the individual who released the information to civil and criminal penalties under 5 U.S.C. § 552a and 42 U.S.C. § 1306.

F. Destruction or Retention of Data

When the parties have no further need of the other party's data provided under this agreement or upon expiration or termination of this agreement, whichever occurs first, the parties must return the data or destroy the data, unless the parties are required to retain the data in accordance with federal records retention requirements or other applicable law. If the data is destroyed, the parties must prepare a letter to the other party within 15 business days of the date of destruction, certifying that all information has been destroyed using appropriate methods of disposal.

If any party is required to retain the data in accordance with federal records retention requirements or other applicable law, the party must notify the other party of the retention requirements prior to expiration or termination of this agreement.

G. Census Bureau Confidentiality

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence and to use the data for statistical purposes only in accordance with the provisions of Title 13, United States Code. Upon receipt, all data acquired as a result of this memorandum of agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60.

AMERICAN OVERSIGHT

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (P.L. 107-347). All systems are fully assessed against NIST Special Publication 800-53r3 "Recommended Security Controls for Federal Information Systems and Organizations," as well as Special Publication 800-37rl "Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce, Office of the CIO, as well as the Department of Commerce, Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "Standards for Security Categorization of Federal Information and Information Systems" and NIST Special Publication 800-60 "Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) – Volume 1: Guide Volume 2: Appendices." Security controls and subsequent assessments are done based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are reported within one hour to the U.S. Computer Emergency Readiness Team (U.S. CERT). Once the Census Bureau becomes aware of a known breach of SSA data, the Census Bureau will contact the identified SSA contacts to discuss the actions and potential remedies in regards to the incident.

H. Handling of Tax Return Information

The Census Bureau will comply with all Federal Safeguards Requirements pursuant to IRC § 6103(p)(4) and as required by the IRS, including those described in IRS Publication 1075, Tax Information Security Guidelines for Federal, State and Local Agencies and Entities, available at http://www.irs.gov.

If the Census Bureau does not have a currently approved Safeguard Procedures Report (SPR), the Census Bureau will submit a new SPR to IRS' Office of Safeguards detailing how all data received from SSA is processed and protected from unauthorized disclosure within 45 days of the execution of this agreement.

Prior to initial access to FTI, and annually thereafter, the Census Bureau will ensure that employees and officers that will have access to FTI receive awareness training regarding confidentiality restrictions applicable to the FTI and certify acknowledgement in writing that they are informed of the criminal penalties and civil liabilities provided by Internal Revenue Code (IRC) sections 7213, 7213A, and 7431 for any willful disclosure or inspection of returns and return information that is unauthorized by the IRC.

AMERICAN OVERSIGHT

The Census Bureau agrees to report suspected unauthorized inspection or disclosure of FTI within 24 hours of discovery to the appropriate Agent-in-Charge, Treasury Inspector General for Tax Administration, and to the IRS Office of Safeguards as specified in Publication 1075, section 10.0.

VIII. REPORTING THEFT OR LOSS OF PERSONALLY IDENTIFIABLE INFORMATION (PII)

Federal agencies are required to report cyber-related incidents involving the loss of PII to the Department of Homeland Security's United States Computer Emergency Readiness Team (US-CERT) and paper PII incidents to the agency privacy office within 1 hour of discovering the loss. SSA, in compliance with the OMB directive, requires the Census Bureau Data Custodian and all other Census Bureau authorized users of the PII described in this agreement to follow the procedures below for reporting a loss or suspected loss of said PII to SSA: (1) Immediately notify the SSA Data Custodian; (2) Read the guidelines in Attachment 6 on SSA's policy and procedures for reporting the loss or potential loss of PII; (3) Complete the Worksheet in Attachment 6 for reporting the loss or potential loss of PII as soon as possible and send it to the SSA Data Custodian; and (4) Provide updates to the SSA Data Custodian as they become available.

The Census Bureau will implement its policies and procedures for responding to the breach of PII as described below and in accordance with the OMB Directive, OMB-M-07-16, "Safeguarding Against and Responding to the Breach of Personally Identifiable Information," as amended by OMB-M-15-01. In the event of a breach, theft, loss, or potential loss of PII at the Census Bureau, the Census Bureau must also provide the SSA Project Coordinator a detailed report of the incident, in accordance with SSA's loss reporting procedures. In the event of a breach, theft, loss, or potential loss of PII at SSA (Title 13 SSNs during processing and matching), SSA must immediately contact the Census Bureau Project Coordinator and Census IT Security at 301-763-3333. In addition, a breach at either agency would need to comply with SSA's loss reporting procedures.

IX. DURATION OF AGREEMENT

A. Performance

This agreement is effective September 28, 2015 for a period of 5 years, and will expire on September 27, 2020.

B. Data Security and Safeguards

Notwithstanding Paragraph A immediately above, all provisions in this agreement as to security and safeguards, including data usage and access provisions, shall remain in effect for all information SSA provides to the Census Bureau under this agreement for as long as the Census Bureau retains such information.

AMERICAN OVERSIGHT

X. MODIFICATION AND TERMINATION

Modifications to this agreement must be in writing and agreed to by the parties. Any additional approved projects require modification of this agreement and Attachment 1.

This agreement may be terminated by either party upon 30 days advance written notice.

XI. AUDITS

SSA retains the right to conduct security reviews and onsite inspections to ensure that the Census Bureau maintains adequate safeguards and security measures. SSA will notify the Census Bureau with at least 24 hours advance notice of an onsite inspection in order to cause minimal disruption to the Census Bureau's operations.

The Census Bureau retains the right to conduct security reviews and onsite inspections to ensure that the SSA maintains adequate safeguards and security measures. The Census Bureau will notify SSA with at least 24 hours advance notice of an onsite inspection in order to cause minimal disruption to SSA's operations.

XII. DISCLAIMERS

A. SSA is not liable for any damages or loss resulting from errors in information provided to the Census Bureau under this agreement. Furthermore, SSA is not liable for damages or loss resulting from the destruction of any materials or data provided by the Census Bureau. All information furnished to the Census Bureau will be subject to the limitations and qualifications, if any, transmitted with such information. If, because of any such error, loss or destruction attributable to SSA, the services must be re-performed by SSA, the additional cost thereof will be treated as a part of the full costs incurred in compiling and furnishing such information and will be paid by the Census Bureau. Should this situation arise, the parties will execute a modification to this agreement to specify and cover any such additional work and costs.

B. The delivery by SSA of the goods and/or services described herein and the timeliness of said delivery are authorized only to the extent that they are consistent with proper performance of the official duties and obligations of SSA and the relative importance of this request to others. If for any reason SSA delays or fails to provide services, or discontinues the services or any part thereof, SSA is not liable for any damages or loss resulting from such delay or for any such failure or discontinuance.

XIII. FUNDING

SSA and the Census Bureau agree that the information exchange under this agreement is mutually beneficial; therefore, the expenses involved in this information exchange will be

AMERICAN OVERSIGHT

deemed reciprocal and each agency will pay its own expenses. In the event material changes to this information exchange require a cost adjustment, SSA and Census may enter into a reimbursable agreement so that neither party bears a disproportionate share of the costs.

XIV. CONTACTS

SSA Project Coordinator
Paul Davies
ODEPP
500 E Street SW, Room 922
Washington, DC 20254
(202) 358-6277
Paul.Davies@ssa.gov

Census Bureau Project Coordinator
Amy O'Hara, Chief
CARRA
Room 6H128
4600 Silver Hill Road
Washington, DC 20233
(301) 763-5757
Amy.b.ohara@census.gov

XV. DISPUTE RESOLUTION

Should disagreements arise on the interpretation of the provisions of this agreement or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement or interpretation is not reached within 30 days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

If a dispute related to funding remains unresolved for more than 30 calendar days after the parties have engaged in an escalation of the dispute, it will be resolved in accordance with instructions provided in the Treasury Financial Manual (TFM) Volume I, Part 2, Chapter 4700, Appendix 10, available at http://www.fms.treas.gov/tfm/index.html.

XVI. INTEGRATION

This Memorandum of Agreement, including Attachments 1 through 6, constitutes the entire agreement of the parties with respect to its subject matter. There have been no representations, warranties, or promises made outside of this agreement. This agreement shall take precedence over any other documents that may be in conflict with it.

XVII. CONFLICTS

Nothing herein is intended to conflict with current U.S. Census Bureau, Department of Commerce or SSA directives. If the terms of this agreement are inconsistent with existing directives of either of the agencies entering into this agreement, then the agency with conflict must immediately notify the other party so this agreement may be amended or terminated, if necessary.

AMERICAN OVERSIGHT

XVIII. AUTHORIZING SIGNATURES AND DATES

The signatories below warrant and represent that they have the competent authority on behalf of their respective agencies to enter into the obligations set forth in this agreement.

SOCIAL SECURITY ADMINISTRATION:

Date: 9/24/15

Thomas Hungerford
Acting Associate Commissioner
Office of Research, Evaluation, and Statistics

U. S. CENSUS BUREAU:

Date: 9/30/2015

John H. Thompson
Director
U.S. Census Bureau

XIX. ATTACHMENTS

1. List of Approved/Active Projects That Use the Survey-SSA Linked Data
2. IRS approval for SSA to release limited tax information to the Census Bureau for linkage to SIPP
3. IRS approval for SSA to release limited tax information to the Census Bureau for linkage to CPS
4. File Layouts for SSA Program Data Extracts
5. Disclosure Review Board Memo
6. SSA Policy and Procedures for Reporting the Loss or Suspected Loss of Personally Identifiable Information

AMERICAN OVERSIGHT

AMERICAN OVERSIGHT

SEE: IAA 731-16

MEMORANDUM OF AGREEMENT
ESTABLISHING A JOINT STATISTICAL PROJECT
BETWEEN
THE U.S. CENSUS BUREAU
AND
THE U.S. DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF PRISONS
0094-FY15-NFE-0018

1. PARTIES AND PURPOSE

This document constitutes an agreement between the Bureau of the Census (Census Bureau) and Bureau of Prisons (BOP) for the linking and joint statistical analysis of Census and BOP datasets. Both the Census Bureau and BOP have an interest in expanding the use of administrative records and improving the quality of the data obtained from these records. This MOA establishes a working relationship to produce statistical products providing stakeholders and the public with additional and timelier information. Linkages will result in the improvement of both Census Bureau and BOP correctional facilities frames, answering questions about pre- and post-incarceration economic and social environments, assessing information across datasets measuring similar events, and examining incongruences between survey and administrative data.

2. AUTHORITY

The Census Bureau is authorized to enter into this MOA pursuant to 13 U.S. C. Section 8(b), authorizing the Census Bureau to engage in joint statistical projects with non-profit agencies and organizations on matters of mutual interest, upon equitable apportionment of costs.

BOP employees who will be working on matters associated with this agreement will need to access confidential Census information. Such BOP staff are required to obtain Special Sworn Status pursuant to 13 U.S. C. 23(c). Such staff must demonstrate that they have suitable background clearance and must take Title 13 awareness training. Any access to Title 13 confidential data at BOP's facility is subject to prior approval by the Census Bureau's Data Stewardship Executive Policy Committee upon assurance that the facility and information technology security meets Census Bureau requirements.

The BOP is authorized to enter into this MOA pursuant to the Omnibus Crime Control and Safe Street Act of 1968, as amended, 42 U.S.C. § 3732 (c)(1) and (d)(1), which allows BOP to enter into agreements with other public agencies for the purpose of data collection and analysis.

AMERICAN OVERSIGHT

3. CONFIDENTIALITY OF DATA AND PROTECTION OF HUMAN RESEARCH SUBJECTS

BOP: All data analyzed under this MOA are subject to the privacy and confidentiality requirements of section 812 of the Omnibus Crime Control and Safe Streets Act of 1968 as amended ("Omnibus"), codified at 42 U.S.C. § 3789g. The federal regulations implementing the privacy and confidentiality requirements of section 812 of Omnibus are found at 28 C.F.R. Part 22. The collection and use of data by BOP (and its agents) are governed in part by Section 304 of Omnibus, codified at 42 U.S.C. § 3735.

All provisions of this agreement are subject to the requirements of 28 C.F.R. Part 46 regarding the protection of human subjects.

Census Bureau: The continued confidentiality of data once acquired by the Census Bureau is guaranteed under 13 U.S.C., Section 9. The Census Bureau does not permit anyone other than sworn Census Bureau employees and Special Sworn Status (SSS) individuals to examine these data. The Census Bureau and BOP agree that any information shared under this MOA will remain confidential, that no data under this MOA will be disclosed in an individually-identifiable form, and that all uses will be solely for statistical purposes and not for the purposes of enforcement.
Data transmitted to the Census Bureau will become a part of the Census Bureau's Statistical Administrative Records System (StARS) and is covered under the Census Bureau's System of Records Notice COMMERCE/CENSUS-8, StARS. As such, these records are subject to all of the requirements and conditions of the Privacy Act of 1974.

To the extent authorized by federal law, when the Census Bureau publicly releases information pursuant to this MOA, it shall not identify any individual, business, or government entity and all results will have met the Census Bureau's disclosure avoidance guidelines. Full Title 13 confidentiality is provided to protect the identities of individuals in all items derived from program data until the data are destroyed.
Both parties acknowledge that substantial penalties exist for wrongful disclosure of BOP data provided under this MOA:

- Unauthorized disclosure of the information provided under this MOA may violate the terms of 13 U.S.C., Section 9; 42 U.S.C., Section 1306; 5 U.S.C., Section 552a; and 44 U.S.C., Section 3501. In the event of inconsistency, the most restrictive provisions of these statutes will apply in determining what constitutes an unauthorized disclosure.
- The penalties stipulated for wrongful disclosure in 13 U.S.C., Section 214; 42 U.S.C., Section 1306; 5 U.S.C., Section 552a; and 44 U.S.C., Section 3501 may include imprisonment for up to five years, a fine, or both.
- Knowingly and willfully disclosing or obtaining record(s) under false pretenses may also violate provisions of 5 U.S.C., Section 552a, resulting in penalty. Taking or converting record(s) to one's own use or receiving the file(s) knowing they were stolen or converted may violate 18 U.S.C., Section 641, resulting in penalty.

AMERICAN OVERSIGHT

By signing this MOA, the Census Bureau and BOP agree to abide by all provisions set out in the MOA for the protection of all information contained in the data file(s) transferred from BOP to Census, and acknowledges having received notice of potential criminal, administrative, or civil penalties for violation of the applicable laws supporting the terms of the MOA.

The Census Bureau will notify the BOP within 24 hours if the Census Bureau becomes aware that any data may be lost or disclosed to any unauthorized persons, and cooperate fully in the federal security incident process. This requirement may include notifying affected individuals and covering the cost of specified remedial action if the BOP, in consultation with the Department of Justice Core Management Team, determines that the risk of harm requires notification to affected individual persons of the security breach and /or other remedies. The Census Bureau shall bear the costs of any breaches of privacy from the information entrusted to them, and carry out any remedial action without cost to DOJ or BOP.

4. MUTUAL INTEREST OF THE PARTIES

Under this agreement, the Census Bureau will link administrative and survey data obtained through BOP with other records at the Census Bureau, including, but not limited to, the American Community Survey (ACS), Current Population Survey (CPS), Master Address File (MAF), Census of Population and Housing, and Longitudinal Employer Household Dynamics (LEHD) database. The Census Bureau will also link the data disclosed through BOP to administrative records from public and private sources.

The Census Bureau benefits in that it will use these linked data to improve the quality of the demographic and economic censuses and surveys that it conducts. Attachment I provides additional information on these uses and benefits. The data in the linked files are to be used only for the approved projects described in Attachment I. New projects may be initiated in writing to the Points of Contact for review and written approval by both agencies throughout the term of this agreement. New projects must include a description of the project, Title 13 benefits to the Census Bureau, and the specific individuals who will be involved in the research. All new projects and any modifications, expansions, or enhancements to existing projects that are approved will be subject to all of the terms and conditions of this agreement.

BOP will benefit from the joint research linking survey and administrative data from its Corrections Statistics Program to various data sources that the Census Bureau maintains to study pre- and post-prison earnings, housing, mobility, Medicaid usage, Social Security Administration benefits, and also post-prison mortality outcomes. In addition, BOP is interested in understanding more about its prison and jail facility frames, and in particular potential coverage error in these frames.

This project can be construed as a design, test, and build project, wherein the design aspects will cover the specific statistical products that BOP would like the Census Bureau to produce, assuming that reliable linkages of records can be made; the test phase will consist of efforts by the Census Bureau to link records and assess the quality of the record linkages for the statistical

AMERICAN OVERSIGHT

purposes outlined in the design phase; and the build phase would consist of (a) the Census Bureau producing a set of statistical indicators that BOP can use in its statistical publications and (b) conducting joint research with BOP staff or its visiting fellows or IPA researchers after they have obtained Special Sworn Status (SSS) using the linked data.

5. RESPONSIBILITIES OF THE PARTIES

A. Census Bureau Responsibilities:

1. Provide BOP a list of approved Census Bureau projects, included in Attachment I, which will use BOP-provided data for statistical purposes.
2. Provide progress reports on these projects annually. New project proposals or extensions of current research will be provided to BOP in these progress reports. BOP concurrence is required prior to the use of linked data for new projects.
3. Ensure that data may be accessed in the Census Bureau's Research Data Center Network (RDCs) under approved projects that meet all review criteria and are approved by BOP and the Census Bureau using the Census Bureau's standard data protection processes. Access will include 13 U.S.C., Section 23(c) Special Sworn Status (SSS) researchers participating in the project.
4. The Census Bureau will assist BOP staff in obtaining SSS to conduct the joint research, as necessary.

B. BOP Responsibilities:

1. Provide subject matter expertise to link survey and administrative data from its Corrections Statistics Program to various data sources that the Center for Administrative Records Research and Applications (CARRA) maintains to study topics including, but not limited to, pre- and post-prison earnings, housing, mobility, Medicaid usage, Social Security Administration benefits, and also post-prison mortality outcomes, and the completeness of prison and jail facility frames.

6. EQUITABLE APPORTIONMENT OF COSTS

The costs associated with this agreement are equitably apportioned. Census will provide 1.25 FTE to analyze the linked survey and administrative data and manage the joint statistical project including security, data stewardship, and disclosure avoidance reviews. BOP will provide 1.5 FTE to analyze the linked survey-administrative records data.

7. POINTS OF CONTACT

The points of contact from each party to this agreement are:

Miles D. Harer, Ph.D.
Bureau of Prisons
320 First Street, NW
Washington DC 20534
202-514-9654
mharer@bop.gov

Amy O'Hara, Ph.D.
U.S. Census Bureau
4600 Silver Hill Road
Washington DC 20233
301-763-5757
amy.b.ohara@census.gov

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000228

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

8. DURATION OF AGREEMENT

This agreement will become effective when signed by all parties. The agreement will terminate on September 1, 2020 but may be amended at any time by mutual consent of the parties. The parties will review this agreement at least once every three years to determine whether it should be revised, renewed, or cancelled. Any party may terminate the agreement by providing 30 days written notice to the other party.

9. SEVERABILITY

In the event that any provision of this Agreement is held to be invalid or unenforceable, for any reason, the remainder of the Agreement shall remain in full force and effect.

10. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

9/15/2015

John H. Thompson
Director
U.S. Census Bureau

Digitally signed by SONYA THOMPSON
DN: c=US, o=U.S. Government, ou=Dept of Justice, ou=BOP, cn=SONYA THOMPSON, 0.9.2342.19200300.100.1.1=15001000140305
Date: 2015.09.25 09:39:37 -04'00'

Sonya D. Thompson
Sr. Deputy Assistant Director/CIO
Information, Policy and Public Affairs Division
Federal Bureau of Prisons

10-9-15

Matthew D. Nace
Procurement Executive
Federal Bureau of Prisons

AMERICAN OVERSIGHT

Attachment I: Proposed Projects Using Data Disclosed by BOP

All projects below provide the benefit to the Census Bureau in the areas of Demographic Survey Improvement and Record Linkage Methods.

Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records. The U.S. Census Bureau administers multiple household surveys that collect data related to residence in group quarters, including correctional institutions. This project will evaluate the accuracy of such survey data and explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to group quarters residence. The project will also use the BOP data to investigate survey frame coverage, survey effects and survey non-response.

Improve Census Bureau Record Linkage Methods. The Census Bureau's Person Identification Validation System (PVS) uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the BOP data will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations residing in correctional facilities.

1. Feasibility Study of Linking NCRP Data

The Census Bureau will acquire federal prison data (FPD) from 2009 through the present. Approximately 1 million records will be transmitted in the form of prison admissions records, prison release records, and stock population records. Because the same person may appear in each these three files, the transmission of the multiple files provides for opportunities to test linkages. For example, if the record of person A from the prison admission file is PIKed, that PIK should match the PIK of person A from the prison release file, and so on.

The Census Bureau will explore the completeness and quality of identification variables in the NCRP data, including: First and last name of inmate, date of birth, sex, race, state where the inmate is being held, federal jurisdiction that has legal authority over the inmate, and county of sentencing (which may or may not correspond to county of residence). Some records may include social security numbers.

The FPD also includes the FBI number.

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000230

2. Analysis of SIFCF Data

The Census Bureau will assess how data from the 1997 Survey of Inmates in Federal Correctional Facilities (SIFCF) can be used in linkage projects. BOP will not actually transmit this file, but as the Census Bureau was the data collection agent for this project, asks that CARRA locate the original study files that contain the names and facilities of sampled inmates. The sample size for the 1997 SIFCF was 4,041 inmates.

The Census Bureau will explore the completeness and quality of identification variables in the SIFCF data, including: First and last name of inmate, date of birth, sex, race, and state of residence when arrest occurred.

3. FPD and pre-post prison experiences

If reliable linkages between the FPD and CARRA data sources can be made (following Census Bureau Data Management System procedures to obtain data owner approval for all files), BOP is interested in developing statistical products that address issues such as the following:

1. Routine (perhaps annual) statistics on persons released from prison:
a. What are the post-prison employment outcomes of ex-prisoners, including the types and duration of employment, number of jobs, sectors employed, and earnings, and how do these vary by subgroups of prisoners as well as over time? How do these outcomes vary with the pre-prison admission employment experiences of prisoners?
b. What are the incomes of ex-prisoners, by source of income (e.g., earned, interest, EITC, etc.), and how do they vary by subgroup and over time? How do these vary with pre-prison admission incomes?
c. How much do ex-prisoners use social welfare benefits, such as Medicare TANF, SNAP, and WIC, and how does the consumption of these benefits vary by subgroup and over time? How do these vary with pre-prison admission consumption of benefits?
d. What are the patterns of post-prison release mortality, including the timing of death and survival rates, and how do they vary by subgroup and across release cohorts?
e. How do social welfare benefits use patterns and incomes differ by type of prison release (unconditional versus conditional)?
f. What is the timing of access to social welfare benefits and employment post-prison release?
2. Routine (perhaps annual) statistics on persons admitted into prison:
a. To what extent are persons admitted into prison connected to mainstream institutions of social integration such as labor markets (e.g., employment and income), housing markets (did they buy homes), the military (selective service enrollment)?
b. How many persons admitted into prison received social welfare benefits prior to their admission, and how did this vary by subgroup? Overtime and across admissions' cohorts, are there differences in the consumption of social welfare benefits?

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000231

3. Routine (perhaps annual) statistics on persons released from parole:
a. What social welfare benefits are utilized most often by persons under post-custody community supervision compared to when they are ultimately released from all state supervision?
b. What is the level of geographic movement of ex-parolees from the state where they served their parole sentence?
4. For all NCRP data, race and ethnicity: This would compare the recording of race and ethnicity in the NCRP administrative records with self-report measures of race and ethnicity from the 2010 Decennial Census and possibly other sources, such as the American Community Survey, after completing Census Bureau Data Management System procedures to obtain data owner approval for all files. This effort is critical to BOP to understand how its administrative data on race and ethnicity may misclassify these attributes as compared to self-report data.
5. Routine (perhaps annual) statistics on prisoners who participated in various prison programs during incarceration:
a. What are the post-prison employment outcomes of prison program participants, including the types and duration of employment, number of jobs, sectors employed, and earnings, and how do these vary by subgroups of prisoners as well as over time? How do these outcomes vary with the pre-prison admission employment experiences of prisoners? How do these outcomes differ from inmates not participating in prison programs?
b. What are the incomes of prison program participants, by source of income (e.g., earned, interest, EITC, etc.), and how do they vary in comparison to inmates who did not take prison programs and over time? How do pre-prison admission incomes affect this comparison?
c. How much do prison program participants use social welfare benefits, such as Medicare TANF, SNAP, and WIC, and how does the consumption of these benefits vary in comparison to inmates who did not take prison programs and over time? How do these comparisons vary with pre-prison admission consumption of benefits?
d. What are the patterns of post-prison release mortality, including the timing of death and survival rates, and how do they vary prison program participation status and across release cohorts?
f. What is the timing of access to social welfare benefits and employment post-prison release?

4. Survey of Inmates in Federal Correctional Facilities (SIFCF) 1997

The purpose of a study of the SIFCF 1997 sample is to develop a 17-year retrospective look at what happened to the persons who were incarcerated in federal prisons in 1997. A tentative title for the study would be: "Federal Prisoners Incarcerated in 1997: A 17-Year Look at Custody, Release, and Return to Federal Prison."

Presuming that Census has the original SIFCF 1997 data with names of sampled inmates and can PIK and link the records reliably, this study would track prisoners' outcomes from 1997 through 2014 (or the most recent year of data for available data files). Outcomes of interest to be measured include:

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000232

Mortality: How many died, when did they die, and what was the hazard rate and survival rate?
Incarceration: How many remained incarcerated or were reincarcerated?
Employment: What were the employment patterns, by subgroup, throughout the 10-year period?

Income and earnings: What were the earnings profiles and income (by source) of inmates?
Social welfare benefit consumption: What were the patterns of use of TANF, WIC, SNAP?
Medicare coverage: How many used Medicare and how much did they consume?

Other outcomes may be desirable to measure also, and if so, they would be discussed and described during meetings between CARRA and BOP.

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000233

AMERICAN OVERSIGHT

Social Security Administration

AGREEMENT COVERING REIMBURSABLE SERVICES

JOB NUMBER				
RAFDOC200005	CAN:	4008048	SOC:	6163
	SSA DUNS/BPN:	927645598	SSA TAS:	028 2020 2020 8704
	SSA BETC:	COLL	SSA ALC:	28040001
	SSA EIN:	526004813		

REQUESTING ORGANIZATION

PROGRAM CONTACT NAME/ADDRESS/PHONE#
DEPARTMENT OF COMMERCE
CENSUS BUREAU

Michael A. Berning
4600 Silver Hill Road
Room 5H151
Suitland, MD 20746
(301) 763-2028

FINANCIAL CONTACT NAME/ADDRESS/PHONE#
Darrell Blyden
4600 Silver Hill Road
Room 2K415
Suitland, MD 20746
301 763-4390

SUBJECT TO THE AVAILABILITY OF FUNDS - DSAC

ACCOUNTING DATA (for Federal Government Agencies)

Appropriation/TAS:	013 2020 2022 0450 000
ALC:	13040001
BETC:	DISB
DUNS/BPN:	927645598

EMPLOYER IDENTIFICATION NUMBER (EIN)
526004813

BEGINNING AND ENDING DATES
10/01/2019 through 09/30/2020

TYPE OF SERVICE REQUESTED

PROJECT TITLE OR KIND OF SERVICE
Census Agreement SSA Master Beneficiary and Supplemental Security Income Record files

DESCRIPTION OF SERVICES
Census MBR SSR PVRS data

REFERENCES TO CORRESPONDENCE ON THIS MATTER (copies attached)
Refer to accompanying legal agreement.

SSA PROJECT COORDINATOR

NAME
Sheron M. Matthews

OFFICE
ORDP DEP COMMISSIONER/ORDP ODEPP OAC/ORDP ODEPP ODX DIV

SSA CONTACT FOR INFORMATION PERTAINING TO THIS AGREEMENT

NAME
Stephen DeClue

OFFICE
DEP COMM BFQM

ESTIMATED COST AND FINANCING OF SERVICES

ESTIMATED COST OF SERVICES $ 758,015.87
Project: 6750F01
Org Code: 11-26-2064-00-00-01
Object Class: 25-30-07-00
Census agreement #: 2064-20-PAY-02

FINANCING (Check one):

ADVANCE PAYMENT	(In Full)	N/A
	(Quarterly)	N/A
IPAC		X

SSA AUTHORIZATION

PRINTED NAME Nancy Morales Gonzalez
TITLE Acting Deputy Chief of Staff
SIGNATURE [signature]
DATE 12/11/19

ACCEPTANCE FOR USE OF REQUESTING ORGANIZATION

Please provide the services requested above. We agree to pay you the full cost of such services in the amount estimated above prior to any work being performed, and we also agree to all of the terms and conditions stated in the accompanying Memorandum of Agreement.

NAME OF ORGANIZATION'S PROJECT COORDINATOR Ashley Landreth	TITLE Policy Analyst	
NAME & SIGNATURE OF AUTHORIZING OFFICIAL Nick Orsini [signature]	TITLE Associate Director for Economic Programs	DATE 12-16-19

Form SSA-1235 (11-2014) Destroy Prior Editions

AMERICAN OVERSIGHT

RAFDOC200005

MEMORANDUM OF UNDERSTANDING
BETWEEN
THE SOCIAL SECURITY ADMINISTRATION
AND
THE UNITED STATES CENSUS BUREAU
The SSA Master Beneficiary and Supplemental Security Income Record files

Effective Date: when signed by both parties
Expiration Date: September 30, 2024
SSA Agreement Number: 100034-2019
Census Agreement Number: 2064-20-PAY-02

I. PURPOSE

This Memorandum of Understanding (MOU) between the Department of Commerce, U.S. Census Bureau (Census) and the Social Security Administration (SSA), sets forth the terms, conditions, and safeguards under which SSA will disclose personally identifiable information (PII) to Census for purposes of planning or carrying out a census or survey or related activity pursuant to the provisions of Title13 of the United States Code (Title XIII). Under this MOU, SSA will disclose this PII to Census from the Supplemental Security Income Record and Special Veterans Benefits (SSR) and the Master Beneficiary Record (MBR) for research and statistical purposes only. This MOU also authorizes Census's continued retention and use of MBR and SSR data obtained under past agreements under which SSA disclosed MBR and SSR file and quarterly update information to Census for the same purposes.

II. LEGAL AUTHORITIES

SSA's authorities to disclose extracts from the SSR and the MBR systems of records to Census are 5 U.S.C. § 552a(b)(4), 20 C.F.R. § 401.185(a), and 42 U.S.C. § 1306 which also serves as transfer authority.

Census's authority for access and use of the information under this MOU is 13 U.S.C. §§ 6 and 8(b). Census has legal authority to appoint Special Sworn Status staff, who may access SSA information under this MOU pursuant to 13 U.S.C. § 23(c).

Census will use the records obtained under this MOU and earlier MOUs for authorized research and statistical purposes only and will not use such records to make decisions concerning the rights, benefits, or privileges of specific individuals. As such, this MOU is exempt from the computer matching requirements in the Privacy Act of 1974, as amended by the Computer Matching and Privacy Protection Act of 1988. 5 U.S.C. § 552a(a)(8)(B)(ii).

When fully executed, this MOU constitutes a binding Agreement in accordance with Title 31 U.S.C. § 1501(a)(1) and is subject to the same provisions of appropriation law applicable to MOUs entered into with private contractors.

AMERICAN OVERSIGHT

RAFDOC200005

III. DESCRIPTION OF DATA INVOLVED

SSA will disclose PII from the following Systems of Records

A. Supplemental Security Income Record and Special Veterans Benefits (SSR) (System Number 60-0103) – SSA will disclose the individual-level identifiable SSR data described in Attachment A.

B. Master Beneficiary Record (MBR) (System Number 60-0090) – SSA will disclose the individual-level identifiable MBR data described in Attachment A, which includes Payment History Update System (PHUS) data.

C. SSA will exclude from the extracts and will not disclose Federal Tax Information or other data that is restricted by law, contract, or MOU; or data SSA determines to be sensitive or proprietary in nature.

Data elements within the SSR and MBR have varying degrees of accuracy. SSA will advise on the degree of accuracy for individual data elements, as requested by Census.

Census will maintain the PII received from under this MOU in the following Privacy Act system of record: Commerce/Census 8, "Statistical Administrative Records System" (System). Census use of the System is for statistical purposes only. This System of Records Notice does not have any routine use disclosure provisions.

IV. RESPONSIBILITIES OF THE PARTIES

The responsibilities of the parties to this MOU are as follows:

A. SSA's Responsibilities

1. SSA will prepare the SSR and MBR documentation, which will contain a copy of the record layouts, record lengths, and data dictionaries. SSA will send the SSR and MBR File documentation to Census's Project Coordinator for this MOU. The Project Coordinator will respond to any questions concerning the SSR and MBR File documentation.

2. SSA will provide an extract of all fields in the SSR and MBR record layouts to Census on a quarterly basis. SSA will exclude any data elements it determines are legally restricted or not relevant and necessary for the Census research described in this agreement.

AMERICAN OVERSIGHT

RAFDOC200005

B. Census Responsibilities

1. Census will pay SSA for the annual extracts of the SSR and the MBR in the amount specified on the accompanying Form SSA-1235.

2. Prior to internal dissemination of information from the SSR and the MBR for authorized research and statistical purposes, Census will replace all SSNs with unique non-identifying codes. Census will limit access to SSNs from the SSR and the MBR files to Census employees and those working for Census under Title 13 Special Sworn Status (SSS) (collectively, "Census staff") who work within a secure restricted-access environment and have a need for the identifying information for an authorized research or statistical project.

3. Census will maintain a list of all Census staff that have access to, or are responsible for managing Census staff that will have access to, the SSR and MBR. As needed, Census will provide this list to SSA's Project Officer for auditing purposes.

4. Census will ensure all SSR and MBR data acquired under this MOU may only be accessed and used at Census Headquarters and Census controlled and operated Federal Statistical Research Data Centers (FSRDCs), by Census staff, for projects authorized under this MOU. Census must obtain SSA prior written approval to transmit SSR and MBR data to any other location. Before requesting SSA written approval for offsite transmission, Census must obtain explicit permission from its Data Stewardship Executive Policy Committee approving the transfer (which requires adherence to a Census-approved security protocol).

5. Census will restrict access to the SSA SSR and MBR data to a minimal number of Census staff who need the information for authorized research (as described in Section V of this MOU). Census is responsible for the compliance of its staff, including those working for Census under SSS, with the terms of this MOU.

6. Census must provide quarterly project reports to SSA of all research and statistical projects using SSR and MBR data. Census will submit its quarterly reports to SSA on the first day of each quarter (January 1, April 1, July 1, and October 1) of each year for the life of this MOU. Census written quarterly reports will contain a list of all projects using SSR and MBR information for the life of this MOU, including newly added or modified projects from the quarterly period that is the subject of the report. Such quarterly project reports must include the following information: project name; description of new project or modification; project being modified, where applicable; specific SSR and MBR data involved; data sets to be linked to SSR and MBR data; staff involved in the linkage and project; where data will be accessed. In addition, to staff reported to be involved with a specific linkage and project,

AMERICAN OVERSIGHT

Census must report any other staff that have access to, or are responsible for managing Census staff that will have access to MBR or SSR data.

If SSA has a concern about a specific project, the Office of Research, Evaluation and Statistics (ORES) will notify the Census project officer in writing what its concerns are and that work on the project cannot begin until SSA's concerns have been appropriately addressed. If SSA's concerns have been appropriately addressed, SSA will notify Census in writing that work on the project may begin or resume. If Census cannot address SSA's concerns or SSA determines the project involves inappropriate use of SSA's SSR and or MBR data, SSA will notify Census in writing that is has not approved the project and the project must not use SSR and MBR data.

7. Census will comply with the disclosure avoidance reporting requirements in Section V. C. of this MOU.

8. Census will provide a copy of the Certification and Accreditation to SSA Agreement Project Officer. Census's Authority to Operate (ATO) letter must be signed and dated by the authorizing official of the system housing the SSR and MBR data, and delivered to SSA's Chief Information Security Officer.

V. AUTHORIZED CENSUS USES AND RESTRICTIONS OF THE SSR AND THE MBR

A. Authorized Uses of the SSR and the MBR

Census may use SSR and MBR data for the below SSA-authorized research and statistical purposes only:

1. The research and statistical projects described in Attachment B. All projects in Attachment B must conform to all requirements and limitations in the MOU (including but not limited to those in § V.B); changes to such requirements and limitations require an MOU modification and cannot be modified through written project approval.

2. Person Identification Validation System (PVS): Census developed software to standardize and validate incoming person records to assign a unique Census linkage identifier. The software relies on SSR and MBR data to conduct validation. Census retains this identifier, called the Protected Identification Key (PIK), on files so that SSNs can be removed. This process occurs through the Person Identification Validation System (PVS). The PVS software processes direct identifiers from input files. Census may use PVS only in internal research and statistics projects authorized under this MOU. The PVS system does not append additional identifying information, only a unique identifier to facilitate record linkage.

AMERICAN OVERSIGHT

3. As part of its internal decennial census research and statistical work, the Census may use demographic characteristics from the SSR and MBR (such as name, date of birth, age, sex, race/Hispanic origin, citizenship information as recorded in SSA records, and country of origin) for the direct substitution or replacement of information missing from the Census's decennial censuses. Census may also use such demographic characteristics in its internal efforts to test and improve the decennial censuses and demographic and economic surveys. Such authorized uses include the unduplication of public, private, and census lists; and modeling to design and assign resources to carry out the census or surveys.

4. In addition to authorized purposes 1 through 3 listed above, Census may modify or add new projects to the list of authorized research and statistical projects that may use SSR and MBR data, without SSA's Agreement Project Officer approval, if Census determines the modified or new project meets the following criteria:
    a. The project is a research and statistical activity that is for purpose of planning or carrying out a census or survey or related activity pursuant to the provisions of Title 13.
    b. The project otherwise meets all requirements and limitations of this MOU, including but not limited to:
        i. There is no re-dislosure or publication of SSR and MBR data in a manner not authorized access under this MOU.
        ii. The data will be maintained, accessed, and otherwise used in authorized locations and under the other security requirements in this MOU.
        iii. The SSR and MBR data will not be used to make decisions concerning the rights, benefits, or privileges of specific individuals.

    New or modified projects that do not meet the above criteria require SSA written approval prior to use of SSR and MBR data and being considered an authorized project under this MOU. To request SSA written approval for a project, Census must file a written request that includes the information requested in quarterly project reports. The written request must include the same information as provided in the quarterly reports. See section IV.B.6 above. All projects are subject to the reporting requirements in Section IV.B.6. above.

B. Restrictions on Use and Release of the SSR and the MBR

Census will follow the below restrictions on its use and release of SSR and MBR data:

1. Census will limit its use of SSR and MBR data to authorized research and statistical projects as described in this MOU.

AMERICAN OVERSIGHT

2. Census may not use the SSR or MBR data to validate SSNs for purposes other than those described in this MOU. All validation results must be safeguarded under the terms of this MOU (i.e., results must be treated like SSR and MBR data and PII). Census will not use SSR or MBR data or PVS to validate SSNs or other information for other agencies or entities.

3. All person-level MBR and SSR data, including that used in direct substitution and replacement, must remain internal at Census and must not be publicly released in any form (including through release with decennial census data after 72 years).

4. Census will not re-disclose PII they receive under this MOU to any third party, unless required by law. If release of data derived from or based on data from the MBR or SSR is required by law, as permitted by law, Census must notify SSA of the data to be disclosed and legal requirement for the disclosure at least twenty-four hours before the data is disclosed.

5. Census is authorized to use the disclosure review process described in Section V. C. of this MOU to publish statistical products resulting from authorized research and statistical projects under this MOU.

C. Disclosure Avoidance

Disclosure avoidance is the process for protecting the confidentiality of data when preparing statistical products (e.g., tabulations, regression estimates) for release to the general public. A prohibited disclosure of data occurs when published information can be used to reliably identify an individual whose information was used in compiling the product or sub-portions thereof. Disclosure avoidance procedures modify or remove the characteristics that put individual information at risk for prohibited disclosure. Although a published table may appear to show information about a specific individual, disclosure avoidance steps may disguise or suppress the accurate individual data, to protect privacy while ensuring that the results are still useful. The techniques used disclosure avoidance may vary, depending on the type of data.

Census may publicly release statistical products derived from SSA and Census linked data, resulting from authorized research and statistical projects under this MOU, without advance SSA review and approval, under the following disclosure avoidance conditions:

1. All statistical products must be approved through the Census Disclosure Review Board (DRB), subject to the standard disclosure avoidance and procedural requirements of that process, prior to public release.

AMERICAN OVERSIGHT

2. Census DRB will use agreed upon rigorous and scientifically-sound disclosure avoidance processes and will follow the procedures and techniques described in the Statistical Policy Working Paper 22 (second version, 2005) Report on Statistical Disclosure Limitation Methodology, Federal Committee on Statistical Methodology available at https://www.hhs.gov/sites/default/files/spwp22.pdf.
Noise infusion is Census's preferred disclosure avoidance technique. Census applies noise infusion to all data products that are reported with geographies smaller than a state. Census may require noise infusion for DRB microdata releases, depending on the characteristics of the microdata and the specific variables that are to be released.

3. Upon request and prior to substantive changes, Census must brief SSA on Census's DRB standard requirements and procedures and techniques used to conduct disclosure avoidance.

4. Census will provide SSA with advance notice of any disclosure-proofed statistical products using the data covered by this MOU. The advance notice may be as short as twenty-four hours before public release, unless the parties have developed a standard reporting process to provide regular, advance notice of upcoming public releases under a different timeframe. SSA reserves the right to request a copy of the publication prior to release to account for disclosures of SSR and MBR data.

5. Census will provide SSA with written quarterly reports on all statistical products released by Census that included or were derived from SSR and MBR data. The report will include the project name and number, names of files containing SSR and MBR data used for the project, list of data products reviewed by the DRB, and date the DRB approved the products for publication.

6. If SSA identifies disclosure or privacy concerns with the release of SSA data in Census publications, Census will work with SSA to resolve those concerns (e.g., modifying the concerning portions of publications not yet released, removing concerning portions of already released publications from Census's website or other means of public distribution under Census control).

VI. PROCEDURES FOR RETENTION AND DESTRUCTION OF DATA

When Census has no further need of information SSA provided to it under this MOU or upon termination of this MOU, whichever occurs first, Census must return all SSA information to the SSA Data Custodian, or securely destroy such information. If Census destroys such information, then it must provide a letter within 15 days of the date of destruction to the SSA Data Custodian certifying that all SSA information has been destroyed.

AMERICAN OVERSIGHT

If Census is required to retain the information in accordance with federal records retention requirements or other applicable law, Census must notify SSA of the retention requirements prior to expiration of this MOU and retain the information solely for this purpose.

Census is authorized to retain and continue to use statistical products approved for public release by SSA or the Census DRB under the disclosure avoidance conditions in this MOU.

VII. DATA SECURITY & SAFEGUARDS

SSA and Census will comply with the requirements of the Federal Information Security Management Act (FISMA), 44 U.S.C. Chapter 35, Subchapter II, as amended by the Federal Information Security Modernization Act of 2014 (Pub. L. 113-283); related Office of Management and Budget (OMB) circulars and memoranda, such as Circular A-130, *Managing Information as a Strategic Resource* (July 28, 2016) and Memorandum M-17-12 *Preparing for and Responding to a Breach of Personally Identifiable Information* (January 3, 2017); National Institute of Standards and Technology (NIST) directives; and the Federal Acquisition Regulations, including any applicable amendments published after the effective date of this MOU. These laws, directives, and regulations include requirements for safeguarding Federal information systems and PII used in Federal agency business processes, as well as related reporting requirements. Both agencies recognize, and will implement, the laws, regulations, NIST standards, and OMB directives including those published subsequent to the effective date of this MOU.

FISMA requirements apply to all Federal contractors, organizations, or entities that possess or use Federal information, or that operate, use, or have access to Federal information systems on behalf of an agency. Both agencies are responsible for oversight and compliance of their contractors and agents.

A. Reporting Loss or Theft of PII

If Census experiences a loss of PII obtained from SSA under the terms of this MOU, it will also follow the loss reporting guidelines issued by OMB. In the event of an incident involving the confirmed loss of PII, Census will follow its established procedures, including notification to the proper organizations (e.g., United States Computer Emergency Readiness Team, the agency's privacy office).

In addition, in the event of an actual or suspected breach involving the loss or potential loss of PII disclosed by SSA under this MOU, Census will immediately notify Census' Data Custodian named in this MOU and Census' Privacy Office to report the breach.

Census will also immediately notify SSA's Data Custodian named in this MOU. If Census is unable to speak with the SSA's Data Custodian within one hour or if for

AMERICAN OVERSIGHT

some other reason notifying the SSA Data Custodian is not practicable (e.g., it is outside of the normal business hours), Census will call SSA's National Network Service Center toll free at 1-877-697-4889.

B. Breach Notification

Census will follow PII breach notification policies and related procedures issued by OMB. If Census experiences a breach and determines that the risk of harm requires notification to affected individuals or other remedies, Census will carry out these remedies without cost to SSA.

C. Administrative Safeguards

Census will restrict access to and use of all information obtained from SSA, and any records derived from SSA information, to only those authorized Census staff who need it in connection with the authorized research and statistical projects and activities under this MOU.

D. Cloud Storage

Census will adopt policies and procedures to ensure that the data provided by SSA under this MOU and any data derived from the SSA-provided data that is maintained in a Managed Service Provider or Cloud Service Provider is encrypted at rest and in transit. Census will also ensure that the data are accessed, transferred, stored, or processed within the jurisdiction of United States (i.e., within the continental United States, Hawaii, Alaska, Puerto Rico, Guam, American Samoa, the Northern Mariana Islands and the U.S. Virgin Islands). Census will ensure that policies and procedures protect the security and confidentiality of the information in accordance with Federal law. Only Census employees or individuals with 13 U.S.C. Section 23(c) special sworn status who have a need to know will have the ability to decrypt the data.

E. Physical Safeguards

Census will store the data obtained under this MOU and any data derived therefrom that is not approved for public release in an area that is physically and technologically secure from access by unauthorized persons at all times (e.g., door locks, card keys, biometric identifiers, etc.). Only authorized Census staff will transport such data. Census will establish appropriate safeguards for such data, as determined by a risk-based assessment of the circumstances involved.

F. Technical Safeguards

Census will process the data obtained under this MOU and any data derived therefrom that is not approved for public release under the immediate supervision and control of authorized personnel in a manner that will protect the

AMERICAN OVERSIGHT

confidentiality of the data, so that unauthorized persons cannot retrieve any data by computer, remote terminal, or other means. Systems personnel must enter personal identification numbers when accessing data on the agency's systems. Census will strictly limit authorization to those electronic data areas necessary for the authorized staff to perform his or her official duties.

G. Application of Policy and Procedures

Census will adopt policies and procedures to ensure that it uses the information obtained under this MOU and any data derived therefrom that is not approved for public release solely as provided in this MOU. Census will comply with these guidelines and any subsequent revisions.

H. Security Assessments

The National Institute of Standards and Technology (NIST) Special Publication 800-37, as revised, encourages agencies to accept each other's security assessments in order to reuse information system resources and/or to accept each other's assessed security posture in order to share information. NIST 800-37 further encourages that this type of reciprocity is best achieved when agencies are transparent and make available sufficient evidence regarding the security state of an information system so that an authorizing official from another organization can use that evidence to make credible, risk-based decisions regarding the operation and use of that system or the information it processes, stores, or transmits. Consistent with that guidance, the parties agree to make available to each other upon request system security evidence for the purpose of making risk-based decisions. Requests for this information may be made by either party at any time throughout the duration or any extension of this MOU.

I. Disclosure

Census acknowledges that an unauthorized release or disclosure of information provided by SSA under this MOU may violate the terms of the Privacy Act and 42 U.S.C. § 1306 and subject the individual who disclosed the information to both criminal and civil sanctions. Census will inform all of its employees or agents granted access to this information that the release and disclosure of the information may subject the individual who released the information to civil and criminal penalties under 5 U.S.C. § 552a and other applicable laws.

J. Use of Contractors

Census is authorized to use contractors to fulfill its obligations under this MOU. Prior to disclosing any information obtained from SSA or records derived from SSA information to its contractor(s), Census must:

AMERICAN OVERSIGHT

1. Provide a list of Census current contractor(s) to SSA's Data Custodian. The list must contain: contractor name and address, description of the work that is performed with the information, and the location of where work is performed with the information.

2. Obtain written permission from its contractor(s) to abide by all applicable terms and conditions of this MOU, including but not limited to all terms related to retention and destruction, security and safeguards, and PII loss reporting.

3. Provide SSA's Data Custodian with any updates to Census's contractor list within 48 hours of any change.

VIII. DATA CUSTODIANS

Census Data Custodian for this MOU is Lori Fox (301-763-3404). The Census Data Custodian is responsible for ensuring that Census observes all conditions of use set forth under this MOU and establishes and maintains security arrangements that will safeguard SSA information from loss and unauthorized use. Census will notify SSA within 15 days of any change in Data Custodian.

IX. CONTACTS

SSA Agreement Project Officer
Sheron Matthews, Policy Analyst
ORDP, ODEPPIN, ODXIA, RAIAPB
Annex Building
6401 Security Boulevard
Baltimore, MD 21235
410-966-4750
Sheron.Matthews@ssa.gov

Census Bureau Agreement Project Officer
Michael A. Berning
Assistant Division Chief for Data Aquisition and Curation
Economic Reimbursable Surveys Division
U.S. Census Bureau
301-763-2028
Michael.A.Berning@census.gov

SSA Project Coordinator
Terry Bosak
DEDA, OEEAS
Operations Building
6401 Security Boulevard
Baltimore, MD 21235
(410) 966-5102
Terry.bosak@ssa.gov

Census Bureau Project Coordinator
Ashley Landreth, Policy Analyst
Administrative Records Coordination Branch, Policy Coordination Office
Room HQ8H026A
4600 Silver Hill Road
Washington, DC 20233
(301) 763-8457
Ashley.denele.landreth@census.gov

AMERICAN OVERSIGHT

SSA Billing Contact
Stephen Declue
Office of Finance
Social Security Administration
P.O. Box 47
Baltimore, MD 21235-0047
(410) 966-5919
Stephen.DeClue@ssa.gov

Census Bureau Billing Contact
Darrell Blyden
Financial Services Branch
U.S. Census Bureau
4600 Silver Hill Road, Room 2K415
Washington, DC 20233
(301) 763-4390
darrell.b.blyden@census.gov

X. FUNDING OR REIMBURSEMENT

SSA will collect funds as set forth in the Form SSA-1235 executed between the parties at the beginning of each Fiscal Year (FY) from Census through the Intra-Governmental Payment and Collection (IPAC) system on a quarterly basis, sufficient to reimburse SSA for the costs it has incurred for performing services through the date of billing. A copy of the IPAC billing and all original supporting documentation shall be mailed to Census to Darrell Blyden (see section IX) no later than five (5) calendar days following the processing of the IPAC transaction.

At least quarterly, but no later than 30 days after an accountable event, SSA shall provide Census with a performance report (e.g. a billing statement) that details all work performed to date. Additionally, at least quarterly, the parties will reconcile balances related to revenue and expenses for work performed under the Agreement.

XI. DURATION OF MOU

This MOU will become effective when signed by both parties, and terminates September 30, 2024. Performance will start no earlier than October 1, 2019 and extend through September 30, 2024.

However, this MOU does not authorize SSA to incur obligations through the performance of the services described herein. Performance of such services is authorized only by execution of Form SSA-1235. Moreover, SSA may incur obligations by performing services under a reimbursable agreement only on a fiscal year basis. As part of this Agreement, both parties will execute a Form SSA-1235 that provides the authorization for SSA to perform services under this Agreement in FY 2020. Prior to any performance by SSA of activities under this MOU, both parties will execute a new Form SSA-1235 for each FY that SSA will perform activities under this MOU. The Form SSA-1235 for each FY will identify reimbursable cost estimates for that fiscal year. SSA's ability to perform work for fiscal years beyond FY 2020 is subject to the availability of funds.

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000247

Notwithstanding the foregoing paragraphs, all provisions as to data security and safeguards shall remain in effect for all information SSA provides to Census under this MOU for as long as Census retains such information.

XII. DISPUTE RESOLUTION

Disputes related to this MOU shall be resolved in accordance with instructions provided in the Treasury Financial Manual (TFM) Volume I, Part 2, Chapter 4700, Appendix 10, Intragovernmental Transaction Guide (May 2013).

XIII. MODIFICATION AND TERMINATION OR CANCELLATION

Modifications to this MOU must be in writing and agreed to by the parties. This MOU may be terminated by either party upon 30 days' advance written notice. If Census cancels the order, SSA is authorized to collect costs incurred prior to cancellation of the order plus any termination costs.

XIV. INTEGRATION CLAUSE

This MOU, Attachments A, B, C, and the accompanying Form SSA-1235 constitute the entire Agreement of the parties with respect to its subject matter. There have been no representations, warranties or promises made outside of this MOU. This MOU shall take precedence over any other documents that may be in conflict with it.

XV. DISCLAIMERS

SSA is not liable for any damages or loss resulting from errors in information provided to Census under this MOU. Furthermore, SSA is not liable for damages or loss resulting from the destruction of any materials or data provided by Census. All information furnished to Census will be subject to the limitations and qualifications, if any, transmitted with such information. If, because of any such error, loss or destruction attributable to SSA, the services must be re-performed by SSA, the additional cost thereof will be treated as a part of the full costs incurred in compiling and furnishing such information and will be paid by Census. SSA will obtain Census approval in advance of re-performing any such work that will result in additional cost to Census.

The delivery by SSA of the goods and/or services described herein and the timeliness of said delivery are authorized only to the extent that they are consistent with proper performance of the official duties and obligations of SSA and the relative importance of this request to others. If for any reason SSA delays or fails to provide services, or discontinues the services or any part thereof, SSA is not liable for any damages or loss resulting from such delay or for any such failure or discontinuance.

AMERICAN OVERSIGHT

Title to and ownership of any property purchased from funds transferred under this MOU will reside with SSA. Title to and ownership of any data SSA provides to Census under this MOU will reside with SSA.

XVI. AUTHORIZING SIGNATURES & DATES

The signatories may sign this document electronically by using an approved electronic signature process. Each signatory electronically signing this document agrees that his/her electronic signature has the same legal validity and effect as his/her handwritten signature on the document, and that it has the same meaning as his/her handwritten signature.

Social Security Administration

Nancy Morales Gonzalez
Acting Deputy Chief of Staff

12/11/19
Date

U.S. Census Bureau

FOR:
Kevin Deardoff
Chief, Economic Reimbursable Surveys Division

12/12/19
Date

LIST OF ATTACHMENTS

Attachment A: Individual-level data elements from the Supplemental Security Income Record and Special Veterans Benefits (SSR) (System Number 60-0103) and the Master Beneficiary Record and Payment History Update System (MBR) (System Number 60-0090).

Attachment B: The names of all Census individuals that have access to, or are responsible for managing Census individuals that will have access to, Census's extracts of the SSR and the MBR; and a list of current Census projects that are linked to the SSR and the MBR extracts.

Attachment C: PII Loss Reporting

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000249

Attachment A

Record Layout of SSR Extract Data for Census SSR/MBR/PHUS Agreement

Position number	Variable Acronym	Format
1	HUN	$9.
10	PAN	$9.
19	MFT	$2.
21	T8VET	$1.
22	RCD_EST_JD	YYMMDDN8.
30	BIRTH_JD	YYMMDDN8.
38	CURR_PD_CTRL	$1.
39	PDSCC	$6.
45	PDZIP	$5.
50	PDZIP6_9	$4.
54	PDZIP10_14	$5.
59	ADDR_CHG_JD	YYMMDDN8.
67	DO	$3.
70	PD_CITY	$22.
92	PD_FRN_CNTRY	$35.
127	PDNUM	$1.
128	PDNAMADR1	$35.
163	PDNAMADR2	$35.
198	PDNAMADR3	$35.
233	PDNAMADR4	$35.
268	PDNAMADR5	$35.
303	PDNAMADR6	$35.
338	APPL_ADDR_CTL	$1.
339	AAZIP	$5.
344	AAZIP6_9	$4.
348	AAZIP10_14	$5.
353	AA_CITY	$22.
375	AA_STNAME	$2.
377	AALNG	$1.
378	LNGCTL	$1.
379	AA_ADDR1	$35.
414	AA_ADDR2	$35.
449	AA_ADDR3	$35.
484	AA_ADDR4	$35.
519	AA_ADDR5	$35.
554	FEDPMT	6.
560	STATPMT	6.
566	PSTAT_CUR	$3.
	NAME	
569-600	FILLER	

AMERICAN OVERSIGHT

Record Layout of MBR Extract Data for Census SSR/MBR/PHUS Agreement

Name	Type	Length	Format	Label
SEL_DATE	Date	8	MMDDYY10.	Date of File Selection
CAN	Character	9		Claim Account Number (SSN)
BOAN	Character	9		Beneficiary's Own Account No. (CAN if E
SEXB	Character	1		Beneficiary Sex Code
DOB	Date	8	MMDDYY10.	Date of Birth
AGE	Numeric	8		Age
AGE65	Numeric	8		Indicator ("0" < age 65; "1" > age 65)
LAF	Character	2		Ledger Account File
TAC_CD	Character	1		Type of Award Code
BIC1	Character	2		Beneficiary Identification Code
BIC_TOC	Character	4		Beneficiary Identification Code Type of Cl
TOC_1	Character	1		Type of Claim (Most Recent)
ANSI_SC	Character	2		Mailing Address State Code
ADDR_SCC	Character	5		Mailing Address State and County Code
ANSI_DC	Character	2		Mailing Address District Code
ADDR_ZIP	Character	5		Mailing Address ZIP Code
ADDR_ZIP_ADD_ON	Character	4		Mailing Address ZIP+4
ADDR_CITY	Character	19		Mailing Address City Name
ADDR_STATE	Character	2		Mailing Address State Name
ADDR_FGN_GEO_CODE	Character	5		Mailing Address Foreign Geographic Code
ADDR_COUNTRY	Character	22		Mailing Address Country Name
ADDR_CON_CODE	Character	3		Mailing Address Country Consular Code
ADDR_CON_GEO	Character	8		Mailing Address Foreign Postal Zone
ADDR_FGN_ZONE	Character	15		Mailing Address Foreign Postal Zone
ADDR_UPDDT	Date	8	MMDDYY10.	Mailing Address Update Date
ADDR_NUM_ADDRLN	Character	1		Mailing Address Number of Mailing Addr
ADDR_ADRLN1	Character	22		Mailing Address Line 1
ADDR_ADRLN2	Character	22		Mailing Address Line 2
ADDR_ADRLN3	Character	22		Mailing Address Line 3
ADDR_ADRLN4	Character	22		Mailing Address Line 4
ADDR_ZDPC	Character	3		Mailing Address Zip Delivery Point Code
ADDR_SRCE	Character	1		Mailing Address Input Source of Address
NAME				

AMERICAN OVERSIGHT

Record Layout of MBR Extract Data for Census SSR/MBR/PHUS Agreement

Start Position	End Position	Field Size	Program Mnemonic	Field *Description*
1	19	19	REC-ID	LINKING-ID NUMBER
20	21	2	YEAR	Panel Year
22	27	6	EXTRACT-DATE	Date Record extracted from master files (MMCCYY)
28	2967	2940	DIRECT-PAY	MONTHLY BENEFITS PAID (01/84 – 12/18) (EACH ENTRY 7 POSITIONS - $$$$$$C, there are 420 entries.) (Signed Pos or Neg.)

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000252

Attachment B

List of Census Bureau Projects and Users That May Use SSA's SSR, MBR and PHUS Extracts Data

Modeling Eligibility-Application for Disability Benefits under DI and SSI using the SIPP and Administrative Data (Project ID: 282)
The disability components of the social security and supplemental security income programs have experienced periods of rapid growth since the late 1980's. The basis for this growth in the rolls is little understood. It has long been accepted that the standard set of health and disability measures available from household surveys is not adequate for estimating program eligibility status. An attempt is being made to estimate a structural model to describe and predict the application and eligibility determination process for both programs. Disability applicants and application outcomes are identified by an exact match of the SIPP data to SSA administrative records. In addition we hope to use the panel aspects of the SIPP to address the endogeneity and measurement error problems in self-reported health and work disability measures and their relationship to the decision to apply and the application outcome. This work will include both econometric estimation and policy simulation.

Socioeconomic Differentials in the Returns to Social Security (Project ID: 320)
The purpose of this project is to measure the relationship between differential mortality and the net receipt of Social Security benefits. Often referred to as "the money's worth issue," a number of studies have attempted to get at these effects. The most promising of these studies have attempted to use historical sample data for actual workers to identify the lifetime earnings, for example, of "low" versus "high" wage workers. A problem with previous efforts has been the absence of information on relevant factors such as marital status. The matched SIPP data overcomes previous data deficiencies. The analysis of these data would help us to accurately depict the complex interactions among age, income, marital status, program experience, and mortality. This would extend our understanding of the lifetime redistributional effects of the Social Security program and would provide reliable indicators of the extent to which the progressivity of the Old Age and Survivor's Disability Insurance (OASDI) program is affected by mortality differentials.

Understanding and Increasing Utility of SIPP SSA Data (Project ID: 136)
This project will support and inform the development of an enhanced Census Bureau SIPP Public Use File. On a periodic basis, CBO will also provide technical memoranda to the Census Bureau with recommendations for improved methodology for collecting SIPP data. Those memoranda will compare tabulations of SIPP data for things like beneficiary status and benefit amount with comparable administrative measures, so that the Census Bureau will be better informed about how their estimates compare with known values. CBO will also report to the Census Bureau its findings with regard to misreporting of Social Security

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000253

benefits on the SIPP and other issues. Census, SSA, and CBO will collaborate on the testing of analytic validity of the new public use data products.

Immigration and Social Security (Project ID: 308)
The purpose of this project is to increase our knowledge of the labor force behavior and emigration of immigrants. Little is known about these aspects of immigrant behavior, despite their relevance to projections of the financial status of Social Security. Among the specific areas addressed by this project, and highlighted by the Technical Panel to the 1991 Advisory Council on Social Security as requiring research, are the earnings profiles, labor force participation, and emigration of immigrants. The resulting information will aid in projecting the revenues and costs of the Old Age and Survivor's Disability Insurance (OASDI) system, which are sensitive to assumptions about immigrant employment, earnings, and the number of net immigrants. The SIPP matched to SSA's administrative files will permit tracking individuals (as opposed to cohorts of individuals) over time with a wide array of important explanatory variables. This work will complement other ongoing research on immigrants using decennial census data and the Social Security's Continuous Work History Sample. This project may also address issues related to the current or future economic status of the aged immigrant population.

Analysis of Social Security Reforms that Affect Women's Benefits (Project ID: 238)
The project examines the economic consequences for women of proposed changes in the Social Security program. These changes include (1) a reduction in spouse benefits combined with an increase in survivor benefits; (2) the re-institution of a minimum benefit; (3) modification of AIME and PIA computation formulas; and (4) private retirement accounts. The analysis will assess the costs, distributional consequences, and antipoverty effectiveness of these proposals.

Modeling the Distributional Impact of Alternative Policies under the SSI Program (Project ID: 437)
The purpose of the project is to develop a model for eligibility and participation in the SSI program based on the survey-reported income sources, wealth holdings, and health. Administrative data on program application, benefit receipt, and medical eligibility will be analyzed. The project will identify discrepancies between survey-modeled and administrative eligibility for benefits and the possible survey measurement errors contributing to the discrepancies. The project will also analyze the distributional impact of alternative SSI policies.

Disability Receipt for Older Workers (Project ID: 420)
The proposed project consists of three parts. First would be to undertake descriptive, exploratory work on Disability Income (DI) applicants first receiving their benefits in their fifties and early sixties. Detailed Survey of Income and Program Participation (SIPP) data matched to the Master Beneficiary Record (MBR), the 831 file, and Summary Earnings Record (SER) would be used to identify the demographic and economic characteristics of these workers. The second part examines the validity and usefulness of several of the variables related to disability receipt on the MBR. These variables include, among others, the disability award code, disability adjudication date, hearing decision date, and appeals

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000254

definition. If it is discovered that the MBR data would permit it, the researcher would examine correlates of an acceptance or denial of a DI application at various stages in the application process and at different points in the life course. The third use of these data would be to estimate a function quite similar to Gary Burtless's disability hazard function employed in the Model of Income in the Near Term (MINT). In addition to incorporating information about an individual's age, earnings, histories, and education into this function, the research would also consider whether marriage histories, and/or differences in expected Social Security benefits levels (particularly, their relationship to potential wages) are associated with likelihood of DI benefit receipt. If the MBR data permit, the researcher will compare models that use multiple stages in this process (e.g., application, award, appeal, and award on appeal), as Benitez-Silva and colleagues (1998) employ, with simpler models of the combined hazard of application, acceptance, and receipt (the Burtless model).

Anti-poverty Effects, Distributional Differences and Costs under Current & Modified Law for OASDI and SSI (Project ID: 436)
The Survey of Income and Program Participation (SIPP) matched files are being used to evaluate the distributional differences and anti-poverty effects and costs of current law Social Security benefits and various proposals for modifying the structure and/or level of the benefits received by various types of current and future beneficiaries. The matched data permit marital status and family identification and the modification of benefits under proposals. The effects of modified benefits can be examined by the impact on benefits and the impact on retirement income. Some analysis applies the changes to current beneficiaries, such as aged widows. Some analysis applies the changes to future beneficiaries such as the baby boomers. The survey data are necessary to characterize the poverty effects of the alternative benefit schemes and to determine the targeting of proposed changes to determine the proportion of gross change which accrues to beneficiaries at various income levels.

Developing a Current-period Distributional Model of the Old Age and Survivor's Disability Insurance (OASDI) Program (Project ID: 429)
This model will allow the SSA to consider how a broad range of changes to program structure relating to SSA programs would affect the economic well-being of its beneficiaries in a current period framework. It will put in place a capability to deal with issues such as changes in disability benefits, changes in retirement ages, poverty among aged women, or child care dropout years in a more effective, and timely fashion. The model will allow the SSA to evaluate policy alternatives in terms of outcomes such as the total family income, poverty status, and the household composition of those affected. Also, the model can be used in conjunction with the SIPP-based Supplemental Security Income (SSI) model to compare the target efficiency of Social Security and SSI in achieving a given policy objective. The administrative data are required in order to distinguish types of beneficiaries, to credibly represent alternative benefit levels, and to identify the beneficiaries who would be affected by hypothetical modifications to the current benefit structure; survey data are essential in order to evaluate such benefit provisions in terms of conventional measures of economic well-being.

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000255

Economic Status of Old Age & Survivor's Disability Insurance & Supplemental Security Income Beneficiaries (Project ID: 357)
The purpose of this project is to measure the economic status of various OASDI and SSI beneficiary populations and to model the effects on the economic status of these populations from possible changes in the OASDI and SSI programs and from trends in economic, social and demographic characteristics. The Master Beneficiary Record (MBR), Supplemental Security Income Record (SSR), Summary Earnings Record (SER), NUMIDENT, and Disability Benefits Applications files will be used to model changes in the programs and in economic, social, and demographic trends. They will also be used to improve upon survey reports of economic and demographic characteristics.

"Policy Evaluation of Factors Affecting the Dynamics of Disability Program Participation (Project ID: 367)
Project Description: The project will attempt, subject to confidentiality restrictions, to produce statistics and conduct analyses relating to retirement, disability, and Social Security program issues. Studies under this project may make use of the CPS, SIPP, and/or ACS matched to SSA administrative records (Numident, MBR including PHUS, SSR, 831, and/or MEF (SER and DER)) to address

- Production of descriptive statistics on OASDI beneficiaries, SSI recipients, OASDI tax base, and relevant comparison groups in the general population;
- Trends in eligibility, application for, and receipt of OASDI or SSI benefits, including but not limited to studies of socioeconomic status, demographics, geographic variation, health, functional capacity, work limitations, and changes to program policy;
- Adequacy of OASDI and SSI benefits, including poverty effects;
- Interactions with employment, earnings, and wealth/debt accumulation;
- Interactions with other programs (e.g. SNAP, TANF, VADC, Medicare, Medicaid, state and local assistance programs, etc.);
- Distributional effects of actual or potential policy;
- Behavioral/psychological factors influencing the nature and timing of retirement and the claiming of retirement and/or disability benefits;
- Factors influencing benefit receipt, including labor market behavior, marital history, etc.;
- Factors influencing program solvency, including mortality and fertility;
- Broader community effects of OASDI and SSI."

LEHD Data Infrastructure Project (Project ID: 445)
The LEHD Data Infrastructure Projects goal is to create LEHD Infrastructure File System to support other LEHD projects. Create a linked database of administrative, census, and survey records for individuals and businesses. This linked data LEHD Infrastructure File will be the basis for all LEHD program work and other related projects.

Projecting the Economic Vulnerability of Future Beneficiary Cohorts (Project ID: 369)
This study develops a model to project the retirement income of future cohorts of retirees using the Survey of Income and Program Participation (SIPP) matched data. It specifically focuses on whether later cohorts will be more economically vulnerable at retirement than

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000256

persons born in earlier cohorts. The administrative data on earnings matched to the SIPP permit cohort-specific estimates on the retirement income of future retirees including Social Security benefits from the covered earnings history of men and women (both individually and relative to husbands), pension benefits (both individually and held by husbands), asset income, and earnings while retired under Social Security. Analysis focuses upon distributional differences and economically vulnerable subpopulations such as minorities, low-wage earners, divorced women, and never-married women as well as married couples. Expansions of the model are planned. These will include improving projections of some sources of retirement income, adding sources, projecting the disabled as well as the retired, and projecting some demographic statuses, such as marital status and mortality.

Projected Lifetime Social Security Earnings (Project ID: 459)
This study projects covered earnings for five-year cohorts of women in a way that will be useful for projecting benefits and economic well-being. It uses lifetime Social Security earnings records along with demographic information from the Survey of Income and Program Participation (SIPP). The number of years of covered earnings and the average earnings until retirement age provide important information on future benefit trends. The project also develops models estimating the covered Social Security earnings until retirement for future retirees based on the SIPP characteristics and past observed earnings. The models developed with the older SIPP panels will be applied to estimate projected earnings for later SIPP panels. Analyses will be conducted on the pattern and level of earnings and their relationship to social characteristics, such as marital histories and eligibility of divorcees for spouse and survivor benefits.

Demonstration of Administrative Records Improving Surveys (Project ID: 707)
Objective: To demonstrate methods of integrating data from surveys and administrative records, assess the quality of survey and administrative data, produce data sets that more accurately represent the target population's characteristics, conduct experiments in disclosure-proofing hybrid data sets, and document feasibility. Methodology: We will link administrative records such as TANF, Food Stamps, MSIS, MEDB, HUD, and PCF data to Census Bureau surveys such as the ACS, CPS, and SIPP. First, we will assess the quality of these administrative records independent of the survey data. Then we will integrate the administrative data and assess the quality of the match and the quality of the data items in the survey such as enrollment, receipt, timing, type of benefit, and dollar amounts. We will include an assessment of quality across dimensions such as question wording and questionnaire modality. Based on the relationship between the administrative and survey information, we will develop adjustments to improve the accuracy of the survey data. We will create models to predict values of items needed but not available in the survey. Finally, we will create disclosure-proofed synthetic data sets from the hybrid data and determine their analytic validity and level of confidentiality protection provided. We will include documentation of technical feasibility at each stage.

Person Identification Validation System (PVS) (Project ID: 189)
Objective: This program provides a fully automated on-site production capability for Social Security Number (SSN) verification, housed within the Planning, Research and Evaluation Division (PRED) Administrative Records Research area. This program replaces the existing

AMERICAN OVERSIGHT

arrangement of sending demographic files to the Social Security Administration (SSA) for a comparable procedure. Known as the PRED SSN Verification System (PVS), this new capability enables SSN verification for regularly-repeating demographic surveys such as the CPS and SIPP, as well as for other demographic or administrative files. The PVS also expands data linkage capabilities for merging survey and administrative data sets. Methodology: The PVS uses probabilistic matching to verify SSNs contained within an incoming file against those contained within the Census Numident. The processing consists of a verification phase followed by a two-step search phase. For the verification phase, SSNs are matched using several types of demographic data, including names, dates of birth and gender. Specific weights are set to define acceptable matches. Any records not verified through this phase -- or without an incoming SSN -- are sent forward to the search phase of the system. (Note: In conformance with Census Bureau privacy policy, the PVS does not process any record for which the respondent has refused to provide his or her SSN. Also, due to technical constraints, the PVS does not process records where the respondent withholds both his or her first name and surname.)

"SSA - Income and Poverty Status of the Population 65 and Older: A Comparison of the CPS and the SIPP (Project ID: 746)
The Social Security Administration, Office of Research, Evaluation, and Statistics, publishes Income of the Population 55 or Older, which provides a broad income picture of the population aged 55 or older, with special emphasis on income of the population aged 65 or older. The data source for the series is the March supplement of the Current Population Survey (CPS). For a current research project, which is part of the SIPP-Match MOU, certain measures from this publication for persons aged 65 or older using a calendar year 1998 data file from the 1996 SIPP panel have been calculated. The measures examined include percentage receiving various income sources, aggregate share of various income sources, the importance of Social Security relative to total income, and poverty status. Because Social Security is such a widely received source for the aged population and self-reported receipt status and/or amounts may be inaccurate, the SIPP data to Social Security administrative records will be matched and substitute the Social Security benefit amount from the Master Beneficiary Record (MBR). The Supplemental Security Income (SSI) amount from the Supplemental Security Record (SSR) will also be substituted.

Applicants for Federal Payments and Their Use of Transaction Accounts (Project ID: 832)
The Census Bureau and the Social Security Administration have long standing interests in the biases of reported income in household surveys. In response, the two agencies have a long collaborative history of using Census Bureau demographic survey data matched to SSA's administrative record data to address relevant research questions. This project is concerned with two specific aspects of income, including biases in reporting of:
1. Asset income from bank accounts; and
2. Income from Government payments, particularly disability benefit payments.

There is substantial evidence that certain groups underreport income in the CPS and SIPP. Further, there is evidence of systematic biases in the reporting of asset holdings. Thus, the reporting of income from assets is a particular concern. One theme in the research is that

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000258

the reporting of the existence of an asset holding is perhaps more of a concern than the reporting of the holding's value.

These issues apply to measures of income in the CPS. In addition, although the CPS content does not include asset holdings, some prominent government microsimulation models use the CPS to estimate eligibility for means-tested programs that include an asset test. For these purposes, reported income from the asset is used as an indication of the existence of the asset.

Similarly, there is substantial evidence about certain groups underreporting disability benefit income. Again, an important theme is that reporting of the existence of a payment may be more of a concern than the reporting of the amount.

Potential linkages involving a recent supplement to the CPS would allow us to evaluate biases in the reporting of income in several new ways. First, the FDIC National Survey of Unbanked and Underbanked Households, a supplement to the January 2009 CPS, contains questionnaire items that ask directly about the existence of bank accounts. Second, links to administrative records allow for identification of people who have been awarded disability benefits with very little measurement error. While survey-administrative links have been used for similar purposes before, we wish to link to specific CPS samples that are not covered in previously approved projects.

Using these survey-administrative links, we will produce the following comparisons.
1. Bank accounts. We will compare estimates of the existence of asset accounts based on reporting of asset income versus directly reporting on the existence of an account. Further, we will report breakdowns by different categories of receipt of government payments (defined by the administrative records), including retirement and disability benefits. These comparisons will use the January 2009 FDIC supplement to the CPS as well as the March 2009 CPS.
2. Disability payments. We will compare estimates of the existence of disability payments based on reports of disabling and work-preventing conditions versus administrative records of the receipt of payments. These comparisons will use the March CPS samples for 2007, 2008, 2009 and 2010 as well as the January 2009 sample. These dates were chosen in order to cover different parts of the business cycle during the recent recession.
The methodology for these comparisons will be use of measures of central tendency and dispersion as well as multivariate analysis. Measures of dispersion will employ the Fay method using replicate weights.

Data linkages will be accomplished using the same procedures as have been used for other CPS samples. First, a finder file containing the identifiers for the CPS samples to be linked is created by Census. Individual observations in CPS samples are identified by PH-SEQ and PPPOS. Then, Census creates a crosswalk file containing the identifiers in all the samples combined and adds Social Security Numbers as identified in Census' version of SSA's NUMIDENT files. In this case, the crosswalk file will contain identifiers for the March 2007, March 2008, January 2009, March 2009, and March 2010 samples. The crosswalk file is then sent to SSA via the secure data transmission line. At this point, staff in SSA's Division of

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000259

Earnings Statistics and Analysis create anonymous versions of the administrative files to be linked, including the Master Beneficiary Record, Supplemental Security Record, Disability extracts of the Determination Service Processing Files (NDDSS), NUMIDENT and Master Earnings File (MEF) administrative data files. The anonymous versions of these files contain the CPS identifiers but are stripped of SSNs as well as other identifying information such as name and address. Researchers have access only to the anonymous versions of the administrative data files and the public-use versions of the CPS files. The crosswalk file is securely stored and can only be accessed by the staff responsible for creating the linked administrative files.

The comparisons will be for analytical purposes and may result in publications if trends can be identified. A Research and Statistics Note is a likely publication outlet. The comparisons will add an increment of evidence to what is known about the biases in the reporting of income from these sources.

In addition, we wish to describe economic and demographic trends that are related to asset income from bank accounts and disability benefits income during the recent recession. Preliminary evidence from the public-use CPS and SSA's administrative records indicates that changes occurred that are related to these issues. First, according to the January 2009 CPS supplement, the number of households who lost access to transaction accounts at banks during 2008 exceeded the number of households who gained access to transaction accounts by more than a multiple of two. Second, according to SSA's administrative records, the recent recession was associated with an unprecedented increase in applications for disability benefits. Thus, there is reason to believe that these two important trends have had far-reaching consequences in society. Correspondingly, they may have affected the ability of the Census Bureau to measure well-being - and more importantly, changes in well-being - for specific subgroups in the population. We wish to write analytical reports about these two important trends. Because job loss and declines in income are common elements to both trends, we wish to link to the Master Earnings File to obtain measures of changes in employment and income.

Reports provided by SSA will provide important evidence about whether these economic and demographic trends exacerbate the known biases in the reporting of income. On a direct level, an increase in disability awards leads to a potentially larger impact of underreporting of disability payments. Similarly, if more households are without bank accounts, this creates more potential confusion between respondents who correctly report the absence of asset income and respondents who incorrectly produce a similar result through cognitive biases (like rounding) or item non-response."

SSA - Earnings Record Check Study (Project ID: 749)
The Census Bureau is concerned about the quality of survey responses in the CPS on wage and salary income and self-employment earnings. One reason for the concern is the percentage amount by which income reported in the March CPS differs from aggregate income estimated in the Bureau of Economic Analysis' (BEA's) National Income and Product Accounts (NIPA). The CPS aggregate income from earnings was 96 percent of the comparable amount in the NIPA in 1996. The CPS exceeded the NIPA benchmark on wages

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000260

and salaries by 2 percent in 1996 but underreported self-employment by close to 50 percent. Not only is self-employment income one of the most difficult sources of income to measure, but also the quality of reporting of this source has declined from about two-thirds of the NIPA benchmark in 1990 to about half in 1996. To evaluate the degree of misreporting (or no reporting) of wages and salary and of self-employment in the March CPS, the Bureau needs good data. The best data available are that on SSA's Detailed Earnings Record (DER) in its Master Earnings File (MEF), because it provides breakouts of earnings by each employer. The Census Bureau will compare the survey response to the total earnings of the respondent in the survey income year and the detailed earnings (for each employer) to determine whether the respondent is misunderstanding the question.

SSA - Improved Population Projections (Project ID: 751)
Because the 1973 Exact CPS/SSA/IRS Match captures longitudinal information on a cohort of individuals alive in 1973, it is an increasingly valuable file for analysis of mortality and the characteristics of aging. The new update will serve similar Bureau purposes as previous requests, but with several more years of mortality experience, to assess mortality in relation to the most up-to-date demographic and economic characteristics. There is repeated evidence that low income persons tend to have higher mortality rates and that the gradient of mortality decreases as income increases. A better understanding of socioeconomic, demographic, and occupational differentials in mortality in the United States will assist the Census Bureau in making its population projections (see Population Projections of the United States by Age, Sex, Race, Hispanic Origin, and Nativity: 1999 to 2100).

Imputation of Missing Data in SIPP Using Administrative Records (Project ID: 892)
This project seeks to employ administrative records from the Social Security Administration (SSA) and from the Internal Revenue Service (IRS) to model responses to questions from the Survey of Income and Program Participation (SIPP) in order to impute missing data. Specifically, the Census Bureau Form will use data from W-2 tax forms, as authorized for conducting demographic, economic, and agricultural statistics programs and censuses and related program evaluation. (See 26 CFR, Part 301, 6013(j), 2691-2695).

Administrative Records Research in Support of Decennial Operations, Survey Operations, and Population Estimates (Project ID: 249)
Project 249 evaluates how data can be used to produce statistical census counts and for measuring the population and person characteristics. Under the project, analyses range from single-source/single-year studies to multi-source/multi-year studies to develop methods to obtain the best coverage and data quality combinations. The project involves matching files by person identifier or name, basic street address, and housing unit. We assess whether an administrative records or third party data source is correct relative to survey or census data collected under Title 13, and whether the Title 13 data looks correct relative to single or multiple reports from external sources. We determine which source(s) offer the best information, and which methods or models help achieve the best information. LEHD in Project 249 is being used to better understand coverage in the 1099s and 1040s for decennial census purposes.

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000261

Business Owner Diversity, Area Demographics and Business Performance (Project ID: 994)
Using data from the Survey of Business Owners (SBO) and Annual Survey of Entrepreneurs (ASE) linked to the Longitudinal Business Database (LBD) and the Integrated Longitudinal Business Database (ILBD) as well as census data, and other administrative records data, the project will examine the characteristics and performance of firms by the demographics of the business owners, including the relationship between business owner and the local-area demographics. Some of the analyses will specifically look into potential associations between the performance of firms with multiple owners of diverse racial backgrounds (diverse-owners firms) and the demographics of the local area where the business is located.

NSSRN Internal / Sponsor Data Review and Evaluation Project (Project ID: 1146)
This project is a reimbursable survey that has been established to collect self-administered survey data from nursing professionals. State boards of nursing provide the universe files for the frame. Race data from the T-13 best race data are linked to provide sampling evaluation. The survey collects workforce evaluation data for the HRSA/NCHWA.

2020 Decennial Census Production (Project ID: 987)
DMS987 is the administrative records project within the U.S. Census Bureau that covers administrative data use during testing and production of the 2020 Census. For the 2020 Census, we will use administrative data, third-party data, and internal data to reduce costs, plan efficient operations, and improve data quality. Administrative data will be used during the frame development, respondent motivation, response collection, and post-processing phases. 2020 Census evaluation and experiments activities are covered under DMS1252.

More specifically, data will be used in three broad ways during the response collection and post-processing phases: 1) as an input into statistical modeling; 2) to develop a robust composite data repository for use in various production operations; and 3) to determine citizenship status for final products. Statistical models will be used to help design and assign resources to carry out the census. The composite data will be used to validate response data, enumerate non-responding addresses, and impute missing data. Although the citizenship question was removed from the 2020 Census questionnaire, the Census Bureau will still produce Citizen Voting Age Population (CVAP) estimates for the 2020 Census population.

SSA data is not used during frame development or respondent motivation; it is used during response collection and post-processing. Only data that has be properly processed through the Census Bureau's PVS/PIK system to remove SSN's is used for DMS987 activities. The Numident is a core data source for all three of the activities listed above. SSA data linking children under 18 years of age with their parents is also used in these activities. The Master Beneficiary Record (MBR) will only be used during citizenship determination. Administrative data used for enumeration and response will not be archived, and all data products will go through disclosure avoidance processing so that confidentiality is maintained.

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000262

Health at birth and later life outcomes: Evaluating the returns to policy-driven early health investments (Project ID: 1272)
This study will document the relationship between health at birth and later life outcomes, while evaluating the returns to policy-driven early health investments. First, the project will use within family variation in birth weight to estimate the effect of health at birth on adult health and productivity. Second, the study will analyze specific public health investments that target the prenatal and neonatal periods. The project will evaluate health investments at birth provided to very low birthweight infants. It will evaluate the Comprehensive Perinatal Services Program (CPSP), a landmark program providing enhanced pregnancy-related care for low-income pregnant women in California. In a similar analysis, the study will explore the impact of the Women, Infant, and Child (WIC) program on later outcomes using variation in geographic access to the WIC program.

This project is one of six projects conducted under the Chapin Hall 2016 RFP, and is part of CARRA's Evidence-Building Pilot studies (#2016-001), which will demonstrate the utility of the Census Bureau Data Linkage Infrastructure to support evidence-based research and program evaluations. Studies link local, state, and national administrative data in combination with data available at the Census Bureau to produce statistical analyses and products that provide policy-relevant insights on public programs. Studies range across policy areas, geographic coverage, populations of interest, and methods.

Objective: This project aims to demonstrate the utility of constructing and using linked datasets for reliable measurement of important outcomes of program participants. The linked administrative datasets will provide richer information on outcomes across domains and give researchers and government officials a single access point to relevant data from different data providers. This project will assess and document the quality of national, state, and local administrative data, create record linkages with administrative and census and survey data held at the Census Bureau, and create analyses and statistical products that provide insights into program participants and their outcomes, as well as improve methodology and statistical products.

Methodology: Under the Evidence-Building Pilots, the Census Bureau and delegated qualified researchers will study the outcomes of participants of state, local, and national-level programs. These pilots link local, state, and national administrative records with data held at the Census Bureau, including administrative records, such as Medicare and Medicaid participation, as well as surveys such as the Decennial Census and the American Community Survey (ACS). First, the pilots will assess the quality of the local, state, and national administrative records, as well as the quality of the linkage and the content variables, such as enrollment, benefits, and outcomes. The pilots will create models to predict values of items needed but not available in the administrative dataset alone. Finally, the pilots will create disclosure-proofed, statistical products, such as aggregated tables and model parameters, showing estimates of population and program outcomes. Linking these data sets to various administrative and survey datasets held at the Census Bureau will allow the Census Bureau to produce timely research that will strengthen Census estimates,

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000263

Specifically, the project will bring in data from California Birth Records to be linked with Census Bureau-held survey and administrative data. The project will use a fixed effects estimator that compares the listed outcomes among siblings and twins, employ a regression discontinuity design to study newborns above and below the very low birth weight diagnosis threshold, and use difference-in-differences regression analyses to study the impact of the California Comprehensive Perinatal Services Program (CPSP) and WIC.

This project may be amended to include Internal Revenue Service (IRS) data at a later time.

Improving Measurement of U.S. Health Care Workforce and Institutions (Project ID: 1246)
The intended goal of this project is to improve measurement of the U.S. health care workforce and institutions by evaluating the quality and adequacy of existing data and by producing new estimates about this population. Additionally, to assess the quality of the newly acquired administrative records dataset from the CMS and its value for future research and production purposes, we will examine income, employment, industry, business ownership, and geographic mobility of health care workforce and factors affecting these characteristics. To accomplish our goals, we will link the Census Bureau survey data such as ACS, CPS, SIPP, and Decennial Census and IRS information from Form 1040, Form 1099, Form 1099R, W-2, DER, Form K1, BR, and LBD to the CMS's NPPES dataset which will allow us to identify all health care providers in the U.S. We intend to focus on various health care providers, such as physicians, nurse practitioners, registered nurses, physician assistants, pharmacists, and dentists, and on various health care institutions, such as ambulatory care, hospitals, residential settings and nursing homes, and pharmacies, to address the project's broad questions described below. In this project, we will perform analyses to support five main methodological innovations, each with strong benefits to the Census Bureau. These methodological innovations include validating survey data responses, producing new estimates related to characteristics of health care workforce and institutions, assessing factors and circumstances influencing the accuracy of existing measurement, examining predictors of individual's geographic mobility, and investigating factors affecting economic well-being of the population. As this is a new alternative data source which has not been previously used for statistical research purposes, we acknowledge the uncertainty associated with these new external data and that the quality of the data may limit our ability to conduct some of the work we intend to do.

Developing and Validating New Statistics on Intergenerational Inequality, Poverty, Mobility, and Opportunity (Project ID: 1255)
We will be using these data to evaluate the role that retirement, disability, and supplemental security income play in income inequality, mobility, and opportunity trends and patterns. We will also be using any address or tract information on these files, to help understand residential patterns over time. These data will help the Census Bureau develop and validate new statistics on inequality and mobility.

Income Analysis Using Surveys (Project ID: 867)
We will be using the MBR and PHUS data to validate retirement and disability income in surveys and to track these incomes over time. We will use the SSR to validate supplemental

AMERICAN OVERSIGHT

security income in surveys and to track this income source over time. These data will help the Census Bureau understand income reporting and measurement error in our surveys.

Adult labor market outcomes of Chicago Public School students: Pathways from K-12 to work (Project ID: 7502442)
Under the Evidence-Building Pilots, the Census Bureau and delegated qualified researchers will study the outcomes of participants of state, local, and national-level programs. These pilots link local, state, and national administrative records with data held at the Census Bureau, including administrative records, such as Medicare and Medicaid participation, as well as surveys such as the Decennial Census and the American Community Survey (ACS). First, the pilots will assess the quality of the local, state, and national administrative records, as well as the quality of the linkage and the content variables, such as enrollment, benefits, and outcomes. The pilots will create models to predict values of items needed but not available in the administrative dataset alone. Finally, the pilots will create disclosure-proofed, statistical products, such as aggregated tables and model parameters, showing estimates of population and program outcomes. Linking these data sets to various administrative and survey datasets held at the Census Bureau will allow the Census Bureau to produce timely research that will strengthen Census estimates, products, and activities and inform policies and programs.
Note: This project is "In preparation"

Evaluating the Potential to Improve Income and Well-Being Measurement and Statistics through Administrative Records (Project ID: 1170)
The main goal of DMS project 1170 is to use administrative records from a variety of state and federal government sources, such as the Internal Revenue Service (IRS) and the Social Security Administration (SSA), linked to household surveys, including the Current Population Survey (CPS) including its Annual Social and Economic Supplement (ASEC), the Survey of Income and Program Participation (SIPP), and the American Community Survey (ACS), to examine the potential for improvement in the accuracy and reporting of income statistics, measures of economic status, and income dynamics within the U.S.

Staff from the U.S. Census Bureau and Special Sworn Status (SSS) researchers will work on evaluations and studies that examine the benefits and mechanics of using earnings and income administrative records to improve imputation methodologies, measurement error, and other measurement issues as well as to better understand the relationships between income sources and income and other demographic and labor force characteristics.

This project is a continuation and update of an existing project, #213.

Project #213, as well as its predecessor projects, has been used extensively to study the relationship between administrative and survey income reports.

Subsequent research using the SSA administrative records will proceed along a number of lines:

- Comparing administrative values to survey values allows identification of various forms of reporting error.

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000265

- Comparing administrative values among sampled units, such as non-respondents and ineligible addresses, allows measurement of unit non-response bias and survey field operations.
- Comparing values among a variety of other admin records allows validation of the various data sources and synthesis of preferred values.
- Studying the relationships between various income sources and other characteristics of households and individuals to better understand the determinants of household material well-being and how those relationships may differ between survey income reports and administrative records.

Each of these data uses allows the development and testing of improved sampling, weighting, questionnaire, editing, and imputation, with the ultimate goal of producing data products that blend administrative data sources and surveys in varying degrees.

Some of these data products include unconditional measures of income distribution, while others include estimates of conditional program impacts on the income distribution, over time and across geographic areas.

2020 Census Program for Evaluations and Experiments (CPEX) (Project ID: 1252)
DMS 1252 is the administrative records project within the U.S. Census Bureau that covers the 2020 Census Program for Evaluations and Experiments (CPEX). CPEX documents and evaluates the 2020 Decennial Census programs and operations, as well as tests new methods suggested from previous evaluation work. Results from the 2020 CPEX will serve as the background or basis from which the 2030 Decennial Census is designed, tested, and implemented. Two projects within the 2020 CPEX program expect to use administrative records. One will conduct a real-time administrative record census simulation and the other will explore the possibility of using administrative records to produce net coverage estimates without having field or clerical operations.

SSA data, specifically the Numident, SSA data linking children under 18 years of age with their parents, MBR, Supplemental Security Record (SSR) and the Disability Application File will be used as sources for both of these efforts. These projects will generate output in the form of internal data products and memos, and external working papers, reports for the CPEX memorandum series, publications and presentations at external meetings and conferences. All released output will adhere to strict Title 13 and Title 26 disclosure review guidelines.

Demographic Survey Improvement Project (Project ID: 782)
The core activity of this project is to link administrative data to the SIPP and CPS internal and public use files and conduct analysis of these linked data in order to improve the Census Bureau's census and survey operations. Survey improvement using administrative data has been underway at the Census Bureau for some time. The LEHD program began this effort in 2001 after changes to the Treasury Regulation authorized the use of W-2 data for survey improvement. That work proceeded under ARTS project 458. However changes in the LEHD program, including the re-location of the program to the Economic Directorate at the Census Bureau, necessitated a change in responsibility for survey improvement. The

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000266

division of Housing, Household, and Economic Statistics (HHES) in the Demographic Directorate has now taken on this responsibility and this new project outlines the administrative data to be linked and the specific survey improvement tasks that the division will perform.

2010 and 2020 Census Match Study (Project ID: 249 Subproject P-7508990)
This analysis is reliant on record linkage. The same people and addresses are present in many of the same administrative records data sources. The administrative records files must be unduplicated in order to evaluate them relative to the 2010 Census. Thus, unique person identifiers called protected identification keys (PIKs) are assigned to administrative records through the Person Identification Validation System (PVS). To match administrative records data to the 2010 Census, PIKs must be on these data sources. PIKs are assigned to the 2010 Census through PVS. For the assignment of PIKs, the matching software compared personally identifiable information (PII) from administrative data and the 2010 Census to PII on person reference files. The software has two primary components, and one or both of those components can be utilized depending on the characteristics available in the administrative records and 2010 Census files. The two components are "verification" and "search." The verification module was used when the source file contained a SSN. Count and match ratios are used to determine the quality and coverage of administrative records and the quality and coverage of demographic information in administrative records.

Demographic Survey Improvement Project: Expanded Data Infrastructure and Statistical Modeling Initiative (Project ID: 782 Subproject P-7507389)
The core activity of this project is to link administrative data to the SIPP and CPS internal and public use files and conduct analysis of these linked data in order to improve the Census Bureau's census and survey operations. Survey improvement using administrative data has been underway at the Census Bureau for some time. The LEHD program began this effort in 2001 after changes to the Treasury Regulation authorized the use of W-2 data for survey improvement. That work proceeded under ARTS project 458. However changes in the LEHD program, including the re-location of the program to the Economic Directorate at the Census Bureau, necessitated a change in responsibility for survey improvement. The division of Housing, Household, and Economic Statistics (HHES) in the Demographic Directorate has now taken on this responsibility and this new project outlines the administrative data to be linked and the specific survey improvement tasks that the division will perform.

The linking of survey and administrative data is done using the master SIPP-SSN-PIK and CPS-SSN-PIK crosswalks. These files are created and maintained by the joint efforts of the Demographic Surveys Division (DSD), HHES, and the Data Integration Division (DID). Address and demographic information collected by the CPS and SIPP are provided by DSD to DID. DID uses the PVS system to search administrative databases for SSNs that match survey respondents on the basis of these demographic and geography characteristics. HHES does quality assurance on the output of the PVS system and maintains the final product in its official form. This work is explicitly covered under the CPS and SIPP SSN Validation Projects.

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000267

The Use of Administrative Records and the American Community Survey to Study the Characteristics of Undercounted Young Children in the 2010 Census (Project ID: 249 Subproject P7508790)

Children under age five are historically one of the most difficult segments of the population to enumerate in the U.S. decennial census. The persistent undercount of young children is highest among disadvantaged populations. This study links 2010 Census data and the American Community Survey data to administrative records from the Internal Revenue Service, Housing and Urban Development, Centers for Medicare and Medicaid, Indian Health Service, the National Change of Address File, Temporary Assistance to Needy Families, and the Social Security Administration Numerical Identification System to identify differences between children reported and not reported in the 2010 Census compared to administrative records. Results show that children from racial/ethnic minority groups, those living in multi-family or complex households, and those in households where adults have low educational attainment or limited English proficiency are more likely to be undercounted. One of the subtasks in this project is to develop a census tract hard-to-count score for children under age five using administrative records, the 2010 Census and the Census Planning Database, which would help identify and promote outreach in census tracts with high concentration of young children at risk of under-enumeration in the next decennial census.

"New Subproject #1: Administrative Record Dual System Estimation (Project ID: 1252 Subproject P-7506669)

This 2020 CPEX subproject proposes to use Census Bureau data and administrative data, including Federal Tax Information (FTI) to conduct an evaluation to see if dual system estimates could be generated without conducting an independent post-enumeration survey. This analysis would use administrative records as the second source of data instead of the survey. The census would continue to serve as the first source for comparison. This evaluation would be able to assess if population coverage estimates of similar quality can be generated without having to conduct costly independent listing and independent interviews. This evaluation will start by researching and prototyping approaches on the 2010 Census. Our evaluation will continue by applying and continuing to research approaches on the 2020 Census. The Census Bureau has conducted post-enumeration surveys to measure coverage since the 1950s. Since 1980, the Census Bureau has used dual system estimation to be able to provide alternative measures of coverage. Dual system estimation is a capture-recapture approach to estimate the true population.

AMERICAN OVERSIGHT

Attachment C

SSA Policy and Procedures for Reporting the Loss or Suspected Loss of Personally Identifiable Information (PII)

Social Security's goal is to safeguard and protect the personally identifiable information (PII) entrusted to the agency by reporting immediately the loss or suspected loss of PII to the Department of Homeland Security's United States Computer Emergency Readiness Team (US-CERT). Loss of PII could involve theft, malicious/deliberate breach or accidental mishandling of personally identifiable information in electronic or in paper form.

To accomplish our goal of safeguarding PII, SSA requires that the custodian and all other authorized users of the PII described in this Agreement follow the SSA procedures for reporting a loss or suspected loss of PII to SSA as outlined below. Examples of PII include a person's name, date of birth, Social Security number, bank account information, address, health records and Social Security benefit data.

Procedures for the Custodian and all Other Authorized Users of PII

1. When you lose or suspect you have lost PII, you must notify SSA immediately. Time is of the essence. Provide updates to your supervisor/manager as they become available, but do not delay your initial report to SSA. Please provide SSA with complete and accurate information about the details of the loss or possible PII loss. Use the attached Worksheet to document the following information about the incident.

   a. Staff personnel and area involved in the incident.
   b. SSA custodian/contact information.
   c. A description of the loss or suspected loss (e.g., nature of loss, scope, number of files or records and type of equipment or media) including the approximate time and location of the loss.
   d. How was the data physically stored, packaged and/or contained (e.g., password protected, encrypted, locked briefcase, redacted personal information, etc.)?
   e. Have any individuals or external organizations (e.g., other agencies, law enforcement or the press) been contacted or contacted you?
   f. Have any other reports (e.g., FPS, local police, report to SSA) been filed?
   g. Any other pertinent information.

2. Send the completed Worksheet to SSA and any other parties described in the Agreement or directly involved as soon as possible.
3. The information and details about an incident are sensitive and you should share them only with those who have a need to know.
4. Provide updates to the SSA custodian as they become available.

Worksheet

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000269

Reporting Loss or Potential Loss of Personally Identifiable Information

1. **Information about the individual making the report:**

Name:					
Position:					
Organization:					
Phone Numbers:					
Work:		Cell:		Home/Other:	
E-mail Address:					
Check one of the following:					
Management Official		Security Officer		Non-Management	

2. **Information about the micro data that was lost/stolen:**

Which element(s) of PII did the data contain?

Name		Bank Account Info	
SSN		Medical/Health Information	
Date of Birth		Benefit Payment Info	
Place of Birth		Mother's Maiden Name	
Address		Other (describe):	

Estimated volume of records involved:

3. **How was the data physically stored, packaged and/or contained? Paper or Electronic? (circle one):**

If Electronic, what type of device?

Laptop		Tablet		Backup Tape		Blackberry	
Workstation		Server		CD/DVD		Blackberry Phone #	
Hard Drive		Floppy Disk		USB Drive			
Other (describe):							

Additional Questions if Electronic:

	Yes	No	Not Sure
a. Was the device encrypted?			
b. Was the device password protected?			
c. If a laptop or tablet, was a VPN SmartCard lost?			
Cardholder's Name:			
Cardholder's SSA logon PIN:			
Hardware Make/Model:			
Hardware Serial Number:			

Worksheet – continued

Additional Questions if Paper:

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000270

	Yes	No	Not Sure
a. Was the information in a locked briefcase?			
b. Was the information in a locked cabinet or drawer?			
c. Was the information in a locked vehicle trunk?			
d. Was the information redacted?			
e. Other circumstances:			

4. **If the employee/contractor who was in possession of the data or to whom the data was assigned is not the person making the report (as listed in #1), information about this employee/contractor:**

Name:					
Position:					
Organization:					
Phone Numbers:					
Work:		Cell:		Home/Other:	
E-mail Address:					

5. **Circumstances of the loss:**

   a. **When was it lost/stolen?**

   b. **Brief description of how the loss/theft occurred:**

   c. **When was it reported to the SSA custodian (time/date, SSA custodian name/title/component)?**

6. **Which reports have been filed? (include FPS, local police, and report to SSA)**

Report Filed	Yes	No	Report Number
Federal Protective Service			
Local Police			

	Yes	No
Report to SSA		
Other (describe)		

7. **Other pertinent information (include actions under way, as well as any contacts with other agencies, law enforcement or the press):**

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000271

AGREEMENT TOOLKIT CHECKLIST

As part of the *IOSA Review and Approval Process in SharePoint*, the following checklist will provide guidance on whether or not an agreement or memorandum of understanding needs to be reviewed and cleared by the DRB (and whether the agreement should include the standard DRB language). Should you need to bring your item in front of the DRB, please contact your DAO for assistance with your submission to the weekly agenda.

1. The agreement produces any type of statistical product or microdata OR allows for the acquisition of data.
   a. Yes, **GO TO Q2.**
   b. No, this agreement does not need DRB review (*upload this checklist to IOSA w/division chief's signature*).

2. The agreement intends to release the product(s) outside the Census Bureau.
   a. Yes, **GO TO Q3.**
   b. No, this agreement does not need DRB review (*upload this checklist to IOSA w/division chief's signature*).

3. The work under the agreement collects or makes use of statistical product(s) or microdata that are subject to the confidentiality protections of Title 5, 13, or 26.
   a. Yes, **GO TO Q4.**
   b. No, this agreement does not need DRB review (upload this checklist to IOSA w/division chief's signature). Those working on the agreement will work exclusively with data that are not confidential, and that are not otherwise protected (*e.g., certain Foreign Trade Data*).

4. This is a:
   a. new agreement,[1] **GO TO Q5.**
   b. solely an option year renewal/extension of an existing agreement[2]. This agreement does not need DRB review (*upload this checklist to IOSA w/division chief's signature*)[3].
   c. modification of an existing, signed agreement that DOES NOT alter the statistical product that is produced/released.[4] This agreement does not need DRB review (*upload this checklist to IOSA w/division chief's signature*).

---

[1] "**New agreement**" definition: A written arrangement, outlining a set of tasks and agreed to by the parties, with a start and end date in the future. A new agreement merely refers to the contract vehicle; the work undertaken under a new agreement might be work that the Census Bureau has done before but requires a new (fresh) agreement for the work to continue.

[2] "**Option year renewal**" or "**extension**" definition: An option year renewal of work (usually for an additional year) that was already agreed upon in a current "umbrella" (larger) agreement. Umbrella agreements spell out work to be done, for example, over the next five years; the option year renewal refers back to the umbrella agreement to allow the work to continue from year to year until the option years run out (the total number of years is spelled out in the umbrella agreement). An extension is a type of agreement modification that allows the work currently under an agreement to go on for a few more months (usually to allow for completion of the work).

[3] Bring the agreement to DRB once the umbrella agreement expires and a new one is being drafted (even if it is for substantially the same work). You will need to work with DRB to create a new plan for injecting noise into the resulting statistical products. You will also need to communicate the new disclosure requirements to the sponsor before signing any new agreements.

[4] "**Modification**" definition: (e.g., extending the period of performance, adding funds, adding additional work, or clarifying/changing the terms of the agreement).

AMERICAN OVERSIGHT

d. modification of an existing, signed agreement that DOES alter the statistical product that is produced/released, **GO TO Q5**.

5. This agreement uses a template listed in Appendix A.
   a. No, **GO TO Q6**.
   b. Yes, this agreement does not need DRB review (*upload this checklist to IOSA w/division chief's signature*).

6. This agreement represents statistical work/effort from efforts listed in Appendix B and does not combine with any other confidential data. Appendix B lists products exempt from formal privacy protection below the sub-state level until September 30, 2019. The exemption does not extend to the combination of these products with other products (*whether or not they are on the list*).
   a. No, **GO TO Q7**.
   b. Yes, this agreement does not need DRB review (*upload this checklist to IOSA w/division chief's signature*).

7. The agreement cites an exemption from the Census Bureau's disclosure protection mandate (e.g., authority to provide unprotected microdata to another entity by law, DSEP ruling, etc.)
   a. No, **GO TO THE DRB**. (*Also, incorporate the DRB's standard noise injection language into the agreement, see Appendix C.*)
   b. Yes, this agreement does not need DRB review (*upload this checklist to IOSA w/division chief's signature*).

SIGNATURES

If the checklist above indicates you do not have to bring your agreement to the DRB for review, then your agreement does NOT need to be reviewed and cleared by the DRB. However, your division chief must sign and date this checklist (below) to certify your agreement is exempt from DRB review and clearance. Upload this signed Toolkit Checklist to the *IOSA Review and Approval System in SharePoint*.

As the Division Chief, I certify that... 2064-20-PAY-02 SSA MBR
(*Print Agreement Name / Number*)
does NOT require the DRB's review and approval.

FOR: [signature]
(*Signature*)

12/12/2019
(*Date*)

APPENDICIES

Appendix A

The following agreements are pre-approved and do not require approval by the DRB:

- State SNAP/WIC template (approved by Commerce's OGC)
- Longitudinal Employer-Household Dynamics (LEHD) Program Data Acquisition Template

AMERICAN OVERSIGHT

AMERICAN OVERSIGHT

MEMORANDUM OF AGREEMENT
ESTABLISHING A JOINT STATISTICAL PROJECT
BETWEEN
THE U.S. CENSUS BUREAU
AND
THE U.S. DEPARMENT OF THE ARMY
0094-FY16-JSP-00xx

1. **Parties**

This document constitutes an agreement between the Bureau of the Census (Census) and the Department of the Army Office of Economic and Manpower Analysis (Army) for the acquisition of Army administrative records data. The agreement also establishes a joint statistical research project between the Census and Army that is based on the acquisition and linkage of those data. The research will study the labor market outcomes and socio-economic well-being of Army applicants, servicemembers (includes officers, warrant officers, non-commissioned officers, and soldiers) and their families during and after military service.

2. **Purpose**

This Memorandum of Agreement (MOA) establishes a data acquisition agreement and a joint statistical research relationship between the Census Bureau and the Army to conduct studies related to the labor market outcomes and socio-economic well-being of service members and their families. Research questions to be addressed under this MOA will include, but not be limited to:

A. For selected Army Military Occupational Specialties (MOS) what is the comparison of those service members' earnings to the earnings of the demographically similar persons in the non-Army, civilian workforce?
B. For those service members with spouses, what is the comparison of those spouses' earnings to the earnings of demographically similar persons in the non-Army workforce?
C. For children of service members, what is the comparison of educational attainment, income and other socio-economic factors compared to the children of non-army, civilian parents?
D. For service members, what is the comparison of marital stability factors compared to those of non-Army civilians?
E. For service members, are there labor market indicators/risks of suicide compared to those of non-Army civilians?
F. For service members, how do the post-service labor market outcomes differ for individuals by their participation in the Transition Assistance Program (TAP) and its components?
G. For service members, how do Army programs and services provided during terms of service (e.g., education assistance, pilot transition programs, Army Community Service programs) affect post-service labor market outcomes?
H. For service members, what are the post-service labor market effects of military service experiences including deployments, overseas assignments, and relocations.
I. How do the labor market outcomes differ between service members and military applicants?

AMERICAN OVERSIGHT

All new projects beyond the list above and any modifications, expansions, or enhancements to existing projects that are approved will be subject to all of the terms and conditions of this MOA.

3. Authorities

A. The Census Bureau is authorized to enter into this MOA pursuant to Title 13, U.S.C. Section 8(b) which authorizes the Census Bureau to engage in joint statistical projects with nonprofit agencies or organizations on matters of mutual interest, upon equitable apportionment of costs and Title 13 U.S.C. Section 6 which authorizes the Census Bureau to access by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13 of the U.S. Code.

B. Title 13, United States Code (U.S.C.), authorizes the Census Bureau to utilize the services of researchers, providing access to confidential Census Bureau microdata for specific purposes and subject to the following restrictions:

   i. Section 9 of Title 13 states that Census data are confidential and may only be used for statistical purposes and cannot be disclosed or published in any way that permits identification of the respondent. To delineate "statistical purposes" as it relates to using outside expertise, a July 12, 1983, notice in the Federal Register gives conditions under which the Census Bureau may grant access to confidential data to an individual with expertise or specialized knowledge that will contribute to Census Bureau projects or activities. In particular, the individual researcher may be employed by an organization for which the Census Bureau is performing a service or engaging in a joint project.

   ii. Section 23(c) permits the Census Bureau to use temporary staff to assist the Bureau in carrying out work authorized by Title 13, U.S.C., if such persons are sworn to observe the limitations of Section 9.

   iii. No data or research results may be published that permit identification of a respondent. Section 214 of Title 13, U.S.C. (as amended) imposes a fine of up to $250,000 or a prison term of up to five years (or both) for wrongful disclosure of confidential information.

C. Army (OEMA) is authorized to provide the services described herein under the OEMA Database System Notice, A0680-31 DSC G-1, dated 16 December 2010, FR 78685, as well as 5 U.S.C. 301, Departmental Regulations; 10 U.S.C. 3013, Secretary of the Army; 10 U.S.C. 2358, Research and Development Projects; and E.O. 9397 (SSN). OEMA may disclose administrative data according to provisions of the Privacy Act of 1974, 5 U.S.C. § 552a.

4. Mutual Interest of the Parties

Under this MOA, the Census Bureau will link administrative data obtained from the Army to census, survey, LEHD and administrative records data. These linked data will form the basis for research projects designed to add to the mutual benefit of the Census and Army in understanding more about factors affecting the labor market outcomes and socio-economic well being of Army officers, soldiers and their families:

AMERICAN OVERSIGHT

The Census benefits from this project in that it will use these linked data to improve the quality of the demographic and economic censuses and surveys that it conducts. Additionally, the outcome of this research will improve the quality and understanding of the Longitudinal Employer Household Dynamics data by providing a more granular analysis of the Army population.

The Army will benefit from the joint research linking survey and administrative data from its Army-Experiences-Data to various data sources that the Census Bureau maintains to conduct research that could lead to program improvements to enhance the well-being of Army members and veterans.

5. Responsibilities of the Parties

A. Census Bureau Responsibilities:

1. Acquire, process and provision the 1990 – 2016 (and future years as available) Army-Experience Dataset from the Army.

2. Ensure that data may be accessed in the Census Bureau's Research Data Center Network (RDCs) under approved projects that meet all review criteria and are approved by Army and the Census Bureau using the Census Bureau's standard data protection processes. Access will include 13 U.S.C., Section 23(c) Special Sworn Status (SSS) researchers participating in the project. In addition, approved joint research projects using linked data provided by Census and Army may be conducted using the Census Bureau's Virtual Desktop Infrastructure (VDI) and at the Census Bureau Headquarters, 4600 Silver Hill Road, Suitland, MD and Research Data Center (RDC) locations.

3. Participate in joint research with Army to address the research questions listed in paragraph 2 of this MOA.

4. Assist Army staff in obtaining SSS to conduct the joint research, as necessary.

B. Army Responsibilities:

1. Provide the Census Bureau with the 1990 – 2016 (and future years as available) Army Experience Dataset set that contains, but is not limited to, the variables shown in Attachment 1 of this MOA.

2. Provide metadata for the Army-Experience Dataset that includes a data dictionary and record counts.

3. Participate in joint research with the Census to address the research questions listed in paragraph 2 of this MOA.

6. Equitable Apportionment of Costs

The costs associated with this project are equitably apportioned. Census will provide appropriate staff to analyze the linked survey and administrative data and manage the joint

AMERICAN OVERSIGHT

statistical project including security, data stewardship, and disclosure avoidance reviews. Army will provide the core dataset as shown in Attachment 1 and an appropriate number of researchers to analyze the linked survey-administrative records data.

7. Confidentiality

The Census Bureau assumes an obligation to keep all data received from other agencies in confidence and to use the data for statistical purposes only in accordance with the provisions of Title 13 United States Code. All data analyzed as a result of this interagency MOA will be treated as if they have, at a minimum, Title 13 protection.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r3 "Recommended Security Controls for Federal Information Systems and Organizations," as well as Special Publication 800-37rl "Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO as well as the Department of Commerce Office of Inspector General as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "Standards for Security Categorization of Federal Information and Information Systems" and NIST Special Publication 800-60 "Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) – Volume 1: Guide Volume 2: Appendices." Security controls and subsequent assessments are done based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are reported within one hour to the US CERT. Once the Census Bureau becomes aware of a known breach of Army data, the Census Bureau will contact the identified Army contacts to discuss the actions and potential remedies in regards to the incident.

The Census will retain the original Army-Experience data for two (2) years from the date of receipt. The Census will have unlimited use and ownership of the Army-Experience data after it is commingled with other Census data.

8. Contacts

The contacts for each party to this MOA are as follows:

Amy O'Hara, Ph.D.
Chief, Center for Administrative Records Research & Applications
U.S. Census Bureau
4600 Silver Hill Road
Washington, D.C. 20233
(301) 763-5757
Amy.b.ohara@census.gov

COL David Lyle, Ph.D.
Director, Office of Economic and Manpower Analysis

AMERICAN OVERSIGHT

United States Military Academy
607 Cullum Road
West Point, N.Y. 10996
(845) 938-3329
david.lyle@usma.edu

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

9. Duration of Agreement, Amendments and Modifications

This MOA will become effective when signed by all parties. The Effective Date will be the date of the last signature below. The MOA will terminate on September 30, 2021, but may be amended annually by mutual consent of the parties. The parties will review this MOA at least once every three years to determine whether it should be revised, renewed, or canceled. Any party may terminate this MOA by providing 30 days written notice to the other party.

In the event that any provision of this MOA is held to be invalid or unenforceable, for any reason, the remainder of the MOA shall remain in full force and effect.

10. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this MOA, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

John Thompson
Director, U.S. Census Bureau

9/12/2016
Date

David S. Lyle
COL, U.S. Army
Director, Office of Economic and Manpower Analysis

9/15/2016
Date

AMERICAN OVERSIGHT

Attachment 1

1990 – 2016 Army-Experience Dataset

Variable Name	Variable Description
ssn	Social Security Number
name	Name
dob_s	Date of Birth
filedt_s	File Date
fileyr	File Year
entry_filedt_s	Entry File Date
entry_fileyr	Entry File Fiscal Year
entry_afqsc	Entry AFQT Score
entry_afqtgrp	Entry AFQT Group
entry_basdt_s	Entry Basic Active Service Date
entry_bpedt_s	Entry Basic Entry Pay Date
entry_civedcatd	Entry Civilian Education Level, Recoded, Detailed
entry_civedcatg	Entry Civilian Education Level, Recoded, General
entry_datia_s	Entry Date of Entry onto Active Duty
entry_entrydt_s	Entry Entry Date
entry_etsdt_s	Entry Expiration of Term of Service Date
entry_svcgrp	Entry Service Group
entry_terms	Entry Term of Service
entry_terms1	Entry Term of Service, Recoded
entry_typia	Entry Type of Last Accessions
addrcity	Mailing Address City
addrstate	Mailing Address State
addrzipcd	Mailing Address Zip Code
afqsc	AFQT Percentile Score (1-99)
afqtgrp	Armed Forces Qualification Test (AFQT) Score Category (1, 2, 3A, 3B, 4, 5)
afqtgrpcat1	AFQT Group = CAT 5 (0/1)
afqtgrpcat2	AFQT Group = CAT 4 (0/1)
afqtgrpcat3a	AFQT Group = CAT 3B (0/1)
afqtgrpcat3b	AFQT Group = CAT 3A (0/1)
afqtgrpcat4	AFQT Group = CAT 2 (0/1)
afqtgrpcat5	AFQT Group = CAT 1 (0/1)
ap_filedt_s	AD Pay, Monthly Pay File Date
ap_m_bah	AD Pay, Monthly Pay BAH
ap_m_bahbas	AD Pay, Monthly Pay BAH+BAS
ap_m_baspay	AD Pay, Monthly Pay Base Pay
ap_m_baspay_prev	AD Pay, Monthly Pay Base Pay, Previous Month
ap_m_totalcash	AD Pay, Monthly Pay Total Cash
ap_mgibillstat	AD Pay, MGIB Contribution Status Code
arloc	Army Location Code

AMERICAN OVERSIGHT

Attachment 1

asvabap	ASVAB Test Score, Audio Perception (1-160)
asvabcl	ASVAB Test Score, Clerical Aptitude (1-160)
asvabco	ASVAB Test Score, Combat Aptitude (1-160)
asvabdt_s	ASVAB Test Date
asvabel	ASVAB Test Score, Electronics Aptitude (1-160)
asvabfa	ASBAB Test Score, Field Artillery Aptitude (1-160)
asvabgm	ASVAB Test Score, General Maintenance Apptitude (1-160)
asvabgt	ASVAB Test Score, General Technical Aptitude (1-160)
asvabmm	ASVAB Test Score, Motor Mechanical Aptitude (1-160)
asvabof	ASVAB Test Score, Food Operations Aptitude (1-160)
asvabsc	ASVAB Test Score, Surveillance & Communications Aptitude (1-160)
asvabst	ASVAB Test Score, Skilled Technical Aptitude (1-160)
asvabtest	ASVAB Test Type
bar	Bar to Reenlistment (0/1)
basdt_s	Basic Active Service Date
black	Race = Black (1=Black)
bpedt_s	Basic Pay Entry Date
branch	Branch
choice	Choice at ETS (0/1)
choice_ct	Number of Reenlistment Decisions
choice_sum	Number of Reenlistment Decisions with Choice to Reenlist
chrsvc	Character of Service
citiz	Citizenship Status
civedcatd	Civilian Education Level, Recoded, Detailed
civedcatg	Civilian Education Level, Recoded, General
clg	Civilian Education = College Graduate (0/1)
cmbtfit	Combat Fit or Ready (0/1)
cmf	Career Management Field
cohsat	SAT Cohort
compt	Service Component
compt1	Service Component, Recoded (AC=Active, NG=National Guard,

AMERICAN OVERSIGHT

Attachment 1

	RC=Reserves)
ctzn	Citizenship Status, Recoded (C=Citizen, N=Naturalized, X=Non-Citizen)
datla_s	Date of Entry onto Active Duty
death	Death (0/1)
depend	Dependents (0/1)
deploy_last_filedt_s	Last Deployment End Date
dml	Distibution Management Level
dmsl	Distibution Management Sub-Level
entrydt_s	Entry Date of Entry onto Active Duty
ereupp	Reenlistment Eligibility
etsdt_s	Expiration of Term of Service Date
evermarried	Ever Married (0/1)
female	Gender =Female (0/1)
ged	Civilian Education = General Education Degree (0/1)
goarmyed_total_army_cost	Army Tuition Assistance, Total Cost to Army
goarmyed_total_courses	Army Tuition Assistance, Total Courses
goarmyed_total_credits	Army Tuition Assistance, Total Credits
goarmyed_total_soldier_cost	Army Tuition Assistance, Total Cost to Soldier
grade	Pay Grade (E01-E09)
grd	Civilian Education = Graduate Level Degree (0/1)
grtit	Pay Grade Abbreviation
hisp	Race = Hispanic (1=Hispanic)
hsd	Civilian Education = High School Dropout (0/1)
hsg	Civilian Education = High School Graduate (0/1)
loc	Army Location Name, Country or Army Area + State
lossdt_s	Separation Date
male	Gender =Male (0/1)
marst	Marital Status
mep_afqt_dt	MEPCOM, AFQT Date
mep_afqt_dt_s	MEPCOM, AFQT Date
mep_afqt_pctl	MEPCOM, AFQT Percentile
mep_afqt_test_version	MEPCOM, AFQT Test Version
mep_asvab_raw_ao	MEPCOM, ASVAB Raw Assembing Objects (AO)
mep_asvab_raw_ar	MEPCOM, ASVAB Raw Arithmetic Reasoning (AR)
mep_asvab_raw_as	MEPCOM, ASVAB Raw Auto and Shop Information (AS)

AMERICAN OVERSIGHT

Attachment 1

mep_asvab_raw_cs	MEPCOM, ASVAB Raw Coding Speed (CS)
mep_asvab_raw_ei	MEPCOM, ASVAB Raw Electronics Information (EI)
mep_asvab_raw_gs	MEPCOM, ASVAB Raw General Science (GS)
mep_asvab_raw_mc	MEPCOM, ASVAB Raw Mechanical Comprehension (MC)
mep_asvab_raw_mk	MEPCOM, ASVAB Raw Mathematics Knowledge (MK)
mep_asvab_raw_no	MEPCOM, ASVAB Raw Numerical Operations (NO)
mep_asvab_raw_pc	MEPCOM, ASVAB Raw Paragraph Comprehension (PC)
mep_asvab_raw_ve	MEPCOM, ASVAB Raw Verbal Expression (VE)
mep_asvab_raw_wk	MEPCOM, ASVAB Raw Word Knowledge (WK)
mep_civedcatd	MEPCOM, Civilian Education Level, Recoded, Detailed
mep_civedcatg	MEPCOM,Civilian Education Level, Recoded, General
mep_hor_city	MEPCOM, Home of Record City
mep_hor_county	MEPCOM, Home of Record County
mep_hor_state	MEPCOM, Home of Record State
mep_hor_zip	MEPCOM, Home of Record Zip Code
mep_init_afqt_dt	MEPCOM, Initial AFQT Date
mep_init_afqt_dt_s	MEPCOM, Initial AFQT Date
mep_init_afqt_pctl	MEPCOM, Initial AFQT Percentile
mgib_elig	VA-MGIB, MGIB Eligibility (0/1)
mgib_enroll	VA-MGIB, MGIB Enroll (0/1)
mgib_use	VA-MGIB, MGIB Use (0/1)
ngibdt_s	Date Accepted or Declined GI Bill Enrollment
ngibstat	GI Eligibility Status
nmbr_chld	DEERS, Number of Children
nmbr_chld_0004	DEERS, Number of Children, Age 0 - 4
nmbr_chld_0018	DEERS, Number of Children, Age 0 - 18
nmbr_chld_0507	DEERS, Number of Children, Age 5 - 7
nmbr_chld_0810	DEERS, Number of Children, Age 8 - 10
nmbr_chld_1113	DEERS, Number of Children, Age 11 - 13
nmbr_chld_1417	DEERS, Number of Children, Age 14 - 17
nrdep	TAPDB, Number of Dependents
nrdepa	TAPDB, Number of Dependent Adults
nrdepc	TAPDB, Number of Dependent Children
orace	Race = Other Race (1=Other Race)

AMERICAN OVERSIGHT

Attachment 1

p2002_hfpdur	Months Deployed, Since FY2002
phyca	Physical Category
phypr	Physical Profile (PULHES)
pmos	Primary Military Occupation Specialty
promodt_e4	First File Date in Rank of E4
promodt_e5	First File Date in Rank of E5
promodt_e6	First File Date in Rank of E6
promodt_e7	First File Date in Rank of E7
psicdt_s	Security Investigation Initiated Date
psicstat	Security Investigation Completed Date
psiidt_s	Security Investigation Initiated Status
psiistat	Security Investigation Completed Status
psitype	Security Investigation Type
race	Race / Ethnic Group, General (B=Black, H=Hispanic, W=White, X=Other)
race9	Race / Ethnic Group, Detailed
reup	Reenlisted (0/1)
reup_sum	Number of Reenlistment
reupelig	Reenlistment Eligible (0/1)
satmrecn	SAT Math Recentered
sattotrecn	SAT Total Recentered
satvrecn	SAT Verbal Recentered
sep_addrcity	Separation Mailing Address City
sep_addrstate	Separation Mailing Address State
sep_addrzipcd	Separation Mailing Address Zip Code
sep_chrsvc	Separation Character of Service
sep_grade	Separation Pay Grade (E01-E09)
sep_sepdt_s	Separation Separation Date
sep_spd	Separation Separation Program Designator
sepndoc	Separation Document
sex	Gender (M=Male, F=Female)
smc	Civilian Education = Some College (0/1)
spd	Separation Program Designator
spdgrp	Separation Program Designator Group
stanam	Army Location Name, Installation Name
statebrth	State of Birth
statehor	State of Home of Record
strength_cat_cd	Strengtth Category Code
svcgrp	Service Group
terms	Term of Service
terms1	Term of Service, Recoded
ths_status_cd	THS Status Code
total_hfpdur	Months Deployed, Total
typla	Type of Last Accessions
ucx_elig	UCX Eligibility (0/1)

AMERICAN OVERSIGHT

Attachment 1

ucx_elig_dt_s_1	UCX Eligibility Date 1
ucx_elig_dt_s_2	UCX Eligibility Date 2
ucx_elig_dt_s_3	UCX Eligibility Date 3
ucx_elig_dt_s_4	UCX Eligibility Date 4
ucx_elig_state_1	UCS Eligibility State 1
ucx_elig_state_2	UCS Eligibility State 2
ucx_elig_state_3	UCS Eligibility State 3
ucx_elig_state_4	UCS Eligibility State 4
ucx_inelig_dt_s_1	UCX Ineligibility Date 1
ucx_inelig_dt_s_2	UCX Ineligibility Date 2
ucx_inelig_dt_s_3	UCX Ineligibility Date 3
ucx_inelig_state_1	UCS Ineligibility State 1
ucx_inelig_state_2	UCS Ineligibility State 2
ucx_inelig_state_3	UCS Ineligibility State 3
unitstat	Unit Status
usapda_combined_rating	USAPDA Medical Board, Combined Disability Rating
usapda_final_result_cd	USAPDA Medical Board, Final Result Code
usapda_final_result_dt_s	USAPDA Medical Board, Final Result Date
usapda_ptsd	USAPDA Medical Board, PTSD (0/1)
usapda_tbi	USAPDA Medical Board, TBI (0/1)
usapda_type_case_cd	USAPDA Medical Board, Case Type Code
va_bnf_pt_mn_qy	VA-MGIB, VA Basic Benefit Payment Months Quantity
va_edu_entl_qy	VA-MGIB, MGIB Program Entitlement Months Quantity
va_ki_mth_qy	VA-MGIB, VA Kicker Payment Months Quantity
vadc_cmbrtg	VA-DC, Combined Rating
vadc_comptype	VA-DC, Compensation Type
vadc_deathcomp	VA-DC, Death Compensation (0/1)
vadc_deathpension	VA-DC, Death Pension (0/1)
vadc_diagptsd	VA-DC, PTSD (0/1)
vadc_diagtbi	VA-DC, TBI (0/1)
vadc_dic	VA-DC, Dependent Indemnity Compensation (0/1)
vadc_disablecomp	VA-DC, Disability Compensation (0/1)
vadc_disablepension	VA-DC, Disability Pension (0/1)
vadc_effctvdt_s	VA-DC, Effective Date (0/1)
vadc_entcd	VA-DC, Entitlement Code
vadc_era	VA-DC, Era of Service
vadc_grossawd	VA-DC, Monthly Gross Award
vadc_iu	VA-DC, Unemployability (0/1)
white	Race = Black (1=White)

AMERICAN OVERSIGHT

Attachment 1

yos	Years of Service
dobyr	Birth Year
entryfy	Entry Fiscal Year
mths_deploy_loss	Months Between Last Deployment and Separation
mil_sep_fy	ACAP, Military Separation Fiscal Year
presep_frm_cmpl_dt	ACAP, Preseparation Form Completion Date
acap_depl_cd	ACAP, Deployment Code
acap_ret_cd	ACAP, Retirenent Code
acap_site_cd	ACAP, Location Site Code
acap_spc_pgm_cd	ACAP, Special Program Code
alt_email_addr_tx	ACAP, Alternative Email Address
application_dt	ACAP, Completed an Application for Federal Job Benchmark Date
cell_phone_nr	ACAP, Cell Phone Number
cnsl_cmpl_dt	ACAP, Couseling Completed Date
desired_location_cd	ACAP, Desired Location, State
email_addr_tx	ACAP, Email Address
fed_resume_cmpl_dt	ACAP, Federal Resume Training Completion Date
fed_resume_sent_dt	ACAP, Federal Resume Sent Date
form_version_cd	
hor_phone_nr	ACAP, Home of Record Phone Number
init_cnsl_cmpl_dtm	ACAP, Initial Counseling Completion Date
install_dprt_dt	ACAP, Military Installation Depart Date
intvw_rdy_dt	ACAP, Interview Ready Date
itp_cmpl_dt	ACAP, Individual Transition Plan (ITP) Completion Date
itp_nr	ACAP, Individual Transition Plan (ITP) Type or Number
itp_salary_range_cd	ACAP, Individual Transition Plan (ITP) Salary Range
mil_sep_dt	ACAP, Military Separation Date
mil_sep_ym	ACAP, Military Separation Year-Month
obtained_job_dt	ACAP, Obtained a Job Benchmark Date
phone_nr	ACAP, Phone Number
post_mil_goal_tx	ACAP, Post Military Service Goal Other Text
presep_cmpl_dtm	ACAP, Preseparation Counseling Completion Date
svc_accpt_cd	ACAP, Transition Service Acceptance Code
trnstnr_reg_dt	ACAP, Transition Assistance Program Registration Date

AMERICAN OVERSIGHT

Attachment 1

va_bene_cmpl_dtm	ACAP, VA Benefits I Briefing Completion Date
va_beneii_cmpl_dt	ACAP, VA Benefits II Briefing Completion Date
va_dtap_cmpl_dtm	ACAP, VA Benefits DTAP Briefing Completion Date
wksp_cmpl_dt	ACAP, DOL Workshop Completion Date
presep_frm_cmpl	ACAP, Preseparation Form Completion (0/1)
presep_cmpl	ACAP, Preseparation Counseling Completion (0/1)
va_bene_cmpl	ACAP, VA Benefits Briefing Completion (0/1)
itp_cmpl	ACAP, Individual Transition Plan Completion (0/1)
dd_form_2648	ACAP, Service Usage DD2648 Completion
non_dd_form_2648	ACAP, Service Usage Not DD2648 Completion
acap_svc_use_cat	ACAP, Service Usage Category, Computed
u_fed_job_application_oeat_ct	ACAP, Service Usage, Federal Job Application OEAT Count
u_fed_job_application_oeat_dt	ACAP, Service Usage, Federal Job Application OEAT Date
u_govt_job_application_ct	ACAP, Service Usage, Government Job Application Count
u_govt_job_application_dt	ACAP, Service Usage, Government Job Application Date
u_tap_workshop_attendance_ct	ACAP, Service Usage, TAP Workshop Attendance Count
u_tap_workshop_attendance_dt	ACAP, Service Usage, TAP Workshop Attendance Date
cnsl_any_ct	ACAP, Any Counseling Requested
cnsl_career_change_ct	ACAP, Counseling Requested, Career Change
cnsl_disabled_vet_benefits_ct	ACAP, Counseling Requested, Disabled Veteran Benefits
cnsl_education_training_ct	ACAP, Counseling Requested, Education and Training
cnsl_employment_ct	ACAP, Counseling Requested, Employment
cnsl_finances_ct	ACAP, Counseling Requested, Finances
cnsl_health_life_insurance_ct	ACAP, Counseling Requested, Health or Life Insurance
cnsl_itp_ct	ACAP, Counseling Requested, ITP
cnsl_relocation_ct	ACAP, Counseling Requested,

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000287

Attachment 1

	Relocation
cnsl_reserve_ct	ACAP, Counseling Requested, Reserve Component
cnsl_vet_benefits_brief_ct	ACAP, Counseling Requested, Veteran Benefits
b_cert_tech_schl_accept_ltr_ct	ACAP, Benchmark, Certification/Technical School Acceptance Letter Count
b_cert_tech_schl_accept_ltr_dt	ACAP, Benchmark, Certification/Technical School Acceptance Letter Date
b_cert_tech_schl_apply_ct	ACAP, Benchmark, Certification/Technical School Application Count
b_cert_tech_schl_apply_dt	ACAP, Benchmark, Certification/Technical School Application Date
b_college_accept_ltr_ct	ACAP, Benchmark, College Acceptance Letter Count
b_college_accept_ltr_dt	ACAP, Benchmark, College Acceptance Letter Date
b_college_apply_ct	ACAP, Benchmark, College Application Count
b_college_apply_dt	ACAP, Benchmark, College Application Date
b_dd2958_ct	ACAP, Benchmark, Individual Transition Plan Checklist (DD2958) Count
b_dd2958_dt	ACAP, Benchmark, Individual Transition Plan Checklist (DD2958) Date
b_dol_employ_wrkshp_jko_ct	ACAP, Benchmark, DOL Employment Workshop (JKO) Count
b_dol_employ_wrkshp_jko_dt	ACAP, Benchmark, DOL Employment Workshop (JKO) Date
b_dol_gold_card_ct	ACAP, Benchmark, DOL Gold Card Count
b_dol_gold_card_dt	ACAP, Benchmark, DOL Gold Card Date
b_education_track_ct	ACAP, Benchmark, Education Track Count
b_education_track_dt	ACAP, Benchmark, Education Track Date
b_entrepreneur_track_ct	ACAP, Benchmark, Entrepeneur Track Count
b_entrepreneur_track_dt	ACAP, Benchmark, Entrepeneur Track Date
b_gap_analysis_ct	ACAP, Benchmark, Gap Analysis Count
b_gap_analysis_dt	ACAP, Benchmark, Gap Analysis Date
b_higher_education_jko_ct	ACAP, Benchmark, Higher Education (JKO) Count

AMERICAN OVERSIGHT

Attachment 1

b_higher_education_jko_dt	ACAP, Benchmark, Higher Education (JKO) Date
b_moc_xwalk_jko_ct	ACAP, Benchmark, MOS XWalk (JKO) Count
b_moc_xwalk_jko_dt	ACAP, Benchmark, MOS XWalk (JKO) Date
b_obtain_job_ct	ACAP, Benchmark, Obtained Job Count
b_obtain_job_dt	ACAP, Benchmark, Obtained Job Date
b_personal_finance_jko_ct	ACAP, Benchmark, Personal Finance (JKO) Count
b_personal_finance_jko_dt	ACAP, Benchmark, Personal Finance (JKO) Date
b_post_service_budget_ct	ACAP, Benchmark, Post Service Budget Count
b_post_service_budget_dt	ACAP, Benchmark, Post Service Budget Date
b_technical_track_ct	ACAP, Benchmark, Technical Track Count
b_technical_track_dt	ACAP, Benchmark, Technical Track Date
b_transition_overview_jko_ct	ACAP, Benchmark, Transition Overview (JKO) Count
b_transition_overview_jko_dt	ACAP, Benchmark, Transition Overview (JKO) Date
b_va_benefits_i_jko_ct	ACAP, Benchmark, VA Benefits Briefing I (JKO) Count
b_va_benefits_i_jko_dt	ACAP, Benchmark, VA Benefits Briefing I (JKO) Date
b_va_benefits_ii_jko_ct	ACAP, Benchmark, VA Benefits Briefing II (JKO) Count
b_va_benefits_ii_jko_dt	ACAP, Benchmark, VA Benefits Briefing II (JKO) Date
b_education_track	ACAP, Benchmark, Education Track
b_entrepreneur_track	ACAP, Benchmark, Entrepeneur Track
b_technical_track	ACAP, Benchmark, Technical Track
b_any_gps_track	ACAP, Benchmark, Any GPS Track
n_capstone_ct	ACAP, Notes-Benchmark, Capstone Count
n_capstone_dt	ACAP, Notes-Benchmark, Capstone Date
n_dd2958_ct	ACAP, Notes-Benchmark, Individual Transition Plan Checklist (DD2958) Count
n_dd2958_dt	ACAP, Notes-Benchmark, Individual Transition Plan Checklist (DD2958) Date
n_gap_analysis_ct	ACAP, Notes-Benchmark, Gap Analysis Count

AMERICAN OVERSIGHT

Attachment 1

n_gap_analysis_dt	ACAP, Notes-Benchmark, Gap Analysis Date
n_post_service_budget_ct	ACAP, Notes-Benchmark, Post Service Budget Count
n_post_service_budget_dt	ACAP, Notes-Benchmark, Post Service Budget Date
n_transition_overview_jko_ct	ACAP, Notes-Benchmark, Transition Overview (JKO) Count
n_transition_overview_jko_dt	ACAP, Notes-Benchmark, Transition Overview (JKO) Date
n_va_benefits_i_jko_ct	ACAP, Notes-Benchmark, VA Benefits Briefing I (JKO) Count
n_va_benefits_i_jko_dt	ACAP, Notes-Benchmark, VA Benefits Briefing I (JKO) Date
n_va_benefits_ii_jko_ct	ACAP, Notes-Benchmark, VA Benefits Briefing II (JKO) Count
n_va_benefits_ii_jko_dt	ACAP, Notes-Benchmark, VA Benefits Briefing II (JKO) Date
dd2648_10	ACAP, DD2648, Block 10
dd2648_11	ACAP, DD2648, Block 11
dd2648_11a	ACAP, DD2648, Block 11a
dd2648_11b	ACAP, DD2648, Block 11b
dd2648_11c	ACAP, DD2648, Block 11c
dd2648_11c1	ACAP, DD2648, Block 11c1
dd2648_11c1a	ACAP, DD2648, Block 11c1a
dd2648_11c1b	ACAP, DD2648, Block 11c1b
dd2648_11c1c	ACAP, DD2648, Block 11c1c
dd2648_11c1d	ACAP, DD2648, Block 11c1d
dd2648_11c1e	ACAP, DD2648, Block 11c1e
dd2648_11d	ACAP, DD2648, Block 11d
dd2648_11d1	ACAP, DD2648, Block 11d1
dd2648_11d2	ACAP, DD2648, Block 11d2
dd2648_11d3	ACAP, DD2648, Block 11d3
dd2648_11d4	ACAP, DD2648, Block 11d4
dd2648_11e	ACAP, DD2648, Block 11e
dd2648_11f	ACAP, DD2648, Block 11f
dd2648_11g	ACAP, DD2648, Block 11g
dd2648_11g1	ACAP, DD2648, Block 11g1
dd2648_11g3	ACAP, DD2648, Block 11g3
dd2648_11g4	ACAP, DD2648, Block 11g4
dd2648_11g5	ACAP, DD2648, Block 11g5
dd2648_11h	ACAP, DD2648, Block 11h
dd2648_11i	ACAP, DD2648, Block 11i
dd2648_11i1	ACAP, DD2648, Block 11i1
dd2648_11i2	ACAP, DD2648, Block 11i2
dd2648_11j	ACAP, DD2648, Block 11j

AMERICAN OVERSIGHT

Attachment 1

dd2648_11j1	ACAP, DD2648, Block 11j1
dd2648_11j2	ACAP, DD2648, Block 11j2
dd2648_11k	ACAP, DD2648, Block 11k
dd2648_11l	ACAP, DD2648, Block 11l
dd2648_12a	ACAP, DD2648, Block 12a
dd2648_12b	ACAP, DD2648, Block 12b
dd2648_13	ACAP, DD2648, Block 13
dd2648_14a	ACAP, DD2648, Block 14a
dd2648_14b	ACAP, DD2648, Block 14b
dd2648_14c	ACAP, DD2648, Block 14c
dd2648_15a	ACAP, DD2648, Block 15a
dd2648_15a1	ACAP, DD2648, Block 15a1
dd2648_15a2	ACAP, DD2648, Block 15a2
dd2648_15a3	ACAP, DD2648, Block 15a3
dd2648_15a4	ACAP, DD2648, Block 15a4
dd2648_15b	ACAP, DD2648, Block 15b
dd2648_15b1	ACAP, DD2648, Block 15b1
dd2648_15b2	ACAP, DD2648, Block 15b2
dd2648_16a	ACAP, DD2648, Block 16a
dd2648_16b	ACAP, DD2648, Block 16b
dd2648_16c	ACAP, DD2648, Block 16c
dd2648_16d	ACAP, DD2648, Block 16d
dd2648_16e	ACAP, DD2648, Block 16e
dd2648_16f	ACAP, DD2648, Block 16f
dd2648_16g	ACAP, DD2648, Block 16g
dd2648_16h	ACAP, DD2648, Block 16h
dd2648_16i	ACAP, DD2648, Block 16i
dd2648_17a	ACAP, DD2648, Block 17a
dd2648_17b	ACAP, DD2648, Block 17b
dd2648_17c	ACAP, DD2648, Block 17c
dd2648_17d	ACAP, DD2648, Block 17d
dd2648_17e	ACAP, DD2648, Block 17e
dd2648_18	ACAP, DD2648, Block 18
dd2648_19	ACAP, DD2648, Block 19
dd2648_20a	ACAP, DD2648, Block 20a
dd2648_20b	ACAP, DD2648, Block 20b
dd2648_20c	ACAP, DD2648, Block 20c
dd2648_21	ACAP, DD2648, Block 21
dd2648_22	ACAP, DD2648, Block 22
dd2648_23	ACAP, DD2648, Block 23
dd2648_25a	ACAP, DD2648, Block 25a
dd2648_25b	ACAP, DD2648, Block 25b
dd2648_25b1	ACAP, DD2648, Block 25b1
dd2648_25b2	ACAP, DD2648, Block 25b2
dd2648_25b3	ACAP, DD2648, Block 25b3
dd2648_25b4	ACAP, DD2648, Block 25b4

AMERICAN OVERSIGHT

Attachment 1

dd2648_26a	ACAP, DD2648, Block 26a
dd2648_26b	ACAP, DD2648, Block 26b
dd2648_27	ACAP, DD2648, Block 27
dd2958_1	ACAP, DD2958, Block 1
dd2958_10	ACAP, DD2958, Block 10
dd2958_11	ACAP, DD2958, Block 11
dd2958_12	ACAP, DD2958, Block 12
dd2958_13	ACAP, DD2958, Block 13
dd2958_14	ACAP, DD2958, Block 14
dd2958_15	ACAP, DD2958, Block 15
dd2958_16A	ACAP, DD2958, Block 16A
dd2958_16B	ACAP, DD2958, Block 16B
dd2958_16C	ACAP, DD2958, Block 16C
dd2958_16D	ACAP, DD2958, Block 16D
dd2958_17	ACAP, DD2958, Block 17
dd2958_18	ACAP, DD2958, Block 18
dd2958_19	ACAP, DD2958, Block 19
dd2958_2	ACAP, DD2958, Block 2
dd2958_20	ACAP, DD2958, Block 20
dd2958_21	ACAP, DD2958, Block 21
dd2958_22	ACAP, DD2958, Block 22
dd2958_23	ACAP, DD2958, Block 23
dd2958_24A1	ACAP, DD2958, Block 24A1
dd2958_24A2	ACAP, DD2958, Block 24A2
dd2958_24B	ACAP, DD2958, Block 24B
dd2958_24C	ACAP, DD2958, Block 24C
dd2958_24D	ACAP, DD2958, Block 24D
dd2958_25A1	ACAP, DD2958, Block 25A1
dd2958_25A2	ACAP, DD2958, Block 25A2
dd2958_25B	ACAP, DD2958, Block 25B
dd2958_25C	ACAP, DD2958, Block 25C
dd2958_25D	ACAP, DD2958, Block 25D
dd2958_26A1	ACAP, DD2958, Block 26A1
dd2958_26A2	ACAP, DD2958, Block 26A2
dd2958_26B	ACAP, DD2958, Block 26B
dd2958_28A	ACAP, DD2958, Block 28A
dd2958_28B	ACAP, DD2958, Block 28B
dd2958_29A	ACAP, DD2958, Block 29A
dd2958_29B	ACAP, DD2958, Block 29B
dd2958_29C	ACAP, DD2958, Block 29C
dd2958_30A	ACAP, DD2958, Block 30A
dd2958_30B	ACAP, DD2958, Block 30B
dd2958_30C	ACAP, DD2958, Block 30C
dd2958_4	ACAP, DD2958, Block 4
dd2958_5	ACAP, DD2958, Block 5
dd2958_6	ACAP, DD2958, Block 6

AMERICAN OVERSIGHT

Attachment 1

dd2958_7	ACAP, DD2958, Block 7
dd2958_8	ACAP, DD2958, Block 8
dd2958_9	ACAP, DD2958, Block 9
acap_site_nm	ACAP, Location Site Name
acap_mainsite_cd	ACAP, Locaton Main Site Code
_merge_acap	ACAP, _MERGE (1=Non-Match, 3=Matched)

AMERICAN OVERSIGHT

AMERICAN OVERSIGHT

MEMORANDUM OF UNDERSTANDING
BETWEEN
THE U.S. OFFICE OF PERSONNEL MANAGEMENT
AND
THE U.S. CENSUS BUREAU

1. Purpose.

This Memorandum of Understanding (MOU) sets forth the terms and conditions of an agreement between the U.S. Census Bureau (Census Bureau), a component of the U.S. Department of Commerce, and the U.S. Office of Personnel Management (OPM) for the acquisition of data from the Enterprise Human Resources Integration (EHRI) – Statistical Data Mart (SDM). This agreement represents a commitment to protect the privacy of Federal employees whose records are entrusted to the undersigned, and a mutual commitment to provide statistics that accurately reflect the Federal civilian workforce.

2. Authority.

CENSUS AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

OPM AUTHORITY

The records that OPM is providing to Census Bureau are covered by the Privacy Act. OPM is permitted to disclose the records pursuant to (b)(4) of the Privacy Act of 1974, 5 U.S. Code § 552a.

Further authority for OPM entering into this agreement is based on the following:

- Federal Information Security Management Act (FISMA) as part of the E-Government Act of 2002
- Privacy Act of 1974, 5 U.S.C. § 552a
- Office of Management and Budget (OMB) Circular A-130, Managing Information as a Strategic Resource
- NIST Special Publication 800-47, Security Guide for Interconnecting Information Technology Systems
- Electronic Code of Federal Regulation (e-CFR) - Title 39 → Chapter I → Subchapter D → Part 267 (AUTHORITY: 39 U.S.C. 401; Pub. L. 93-579, 88 Stat. 1896)
- U.S. Office of Personnel Management, Information Security and Privacy Policy,
- U.S. Office of Personnel Management, IT Security Policy and Procedures,

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000295

3. Overview.

The OPM Data Analysis Group is responsible for the oversight of the use and dissemination of EHRI / SDM, which consist of data pertaining to each Federal employee. The Census Bureau is continuing its research program to explore the potential for using administrative records to improve economic and demographic censuses, surveys, and intercensal population estimates. As part of the research, various administrative record files will be included in a research data system called the Longitudinal Employer Household Dynamics (LEHD) system. The goal is to develop optimal combinations of administrative record file information based on data accuracy, timeliness, and availability, as well as to produce statistical products.

The broad objective of this agreement is to improve the Census Bureau data infrastructure and prepare products for better understanding of the dynamics of the U.S. labor market. To this end, the data specified in Attachment 1 will be used by the Census Bureau for the following:

a. Exploring the potential for using administrative records to improve Census Bureau programs, including economic and demographic censuses and surveys and intercensal population estimates, that may be reasonably expected to benefit the LEHD program;
b. Researching, integrating, maintaining, improving, and expanding the LEHD data infrastructure, also referenced as the LEHD System in Section II, Paragraph 5;
c. Researching, developing, implementing, producing, and enhancing LEHD data and products, including the Quarterly Workforce Indicators (QWI), LEHD Origin-Destination Employment Statistics (LODES), Job-to-Job Flows (J2J);
d. Researching, developing, evaluating, implementing, and enhancing economic, statistical, and technical theories, methodologies, analyses, and procedures to improve data quality, timeliness, availability, and applicability of the LEHD data infrastructure and products; and
e. Other LEHD-related purposes agreed to under this agreement in consultation with LED partner states.

This research will provide important data to support Census Bureau programs, including the Master Address File, current demographic and economic survey and census operations, the Intercensal Estimates Program's population and housing estimates, and related census and survey program evaluations.

4. Conditions of Agreement.

Census agrees that:

a. No data exchanged under this MOU may be transferred via email. Encrypted disks that OPM uses to provide the data will be kept in a safe and secure location. All related passwords needed to access the disks will be kept separately.

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000296

b. All data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the moderate risk level in accordance with the National Institute of Standards and Technology (NIST) Federal Information Processing Standards (FIPS) 200 and Special Publication 800-60r1.

c. 13 U.S.C. Section 9 requires the Census Bureau to maintain the confidentiality of the information it receives from OPM. No one except Census Bureau employees and individuals with special sworn status may access the information.

   i. Data can only be used for statistics

   ii. No publication can identify or make identifiable any particular establishment or individual

   iii. Cannot permit anyone to examine individual reports.

d. Prior to the handling of the OPM data, the Census Bureau agrees that each Census Bureau employee and each individual with Census Bureau Special Sworn Status that may have access to the OPM data, shall have signed a standard Census Bureau Affidavit of Nondisclosure, e.g BC1759. Only those individuals with a need to know will access the information for the purpose for which it is provided under this MOU. Only individuals who have undergone a background investigation at the appropriate level and received a favorable adjudication will be allowed access to the data.

e. The Census Bureau will restrict access to the OPM information to authorized employees and officials who need it to perform their official duties in connection with the uses of the data authorized in this agreement. Further, the Census Bureau will advise all personnel who have access to the data of the safeguards required to protect the data, and the civil and criminal sanctions for noncompliance contained in the applicable Federal laws. The Census Bureau will store the information in an area that is physically and technologically secure from access by unauthorized persons at all times (e.g., door locks, card keys, biometric identifiers, etc.).

f. The Census Bureau understands and agrees not to extend the scope (Census Bureau's analytic and statistical activities, including the production of reports, estimates, and published material) of use of the original data files beyond the uses described herein without prior written approval from the OPM. OPM acknowledges that derivative products that no longer contain OPM data items are not covered by this prohibition.

g. To the extent permitted by federal law, the original data received from the program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years. Upon receiving a confirmed written notice to destroy original data files, the Census Bureau will notify OPM of its intentions to destroy or retain the files. Federal law may require the retention of files for a set period before destruction. Any

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000297

destruction of files shall occur at the Census Bureau's expense, and the Census Bureau agrees to send a statement certifying their destruction to OPM within 30 days of their destruction. The Census Bureau agrees that no data from the OPM's original records, or any parts thereof, shall be retained when the aforementioned files are destroyed unless written authorization for the retention of such files has been received and confirmed to the extent permitted by Federal law. OPM understands that while original data files may be destroyed, in accordance with Federal law, the public-use data created by the Census Bureau will not be destroyed.

h. Disclosure Avoidance Review of Statistical Products:

Title 13, Section 9 of the United States Code (U.S.C.) requires the Census Bureau to keep confidential and the information collected from the public under the authority of Title 13. Section 214 of Title 13, U.S.C., and Sections 3551, 3559 and 3571 of Title 18, U.S.C., provide for the imposition of penalties of up to five years in prison and/or up to $250,000.00 in fines for wrongful disclosure of confidential census information.

Disclosure avoidance is the process for protecting the confidentiality of data, as required under Title 13 U.S.C. A disclosure of data occurs when someone can use published statistical information to identify and individual who has provided confidential information under a pledge of confidentiality. For data tabulations, the Census Bureau uses disclosure avoidance procedures to modify or remove the characteristics that put confidential information at risk for disclosure. Although a published table may appear to show information about a specific individual, the Census Bureau has taken steps to disguise or suppress the original data, while making sure the results are still useful. The techniques used by the Census Bureau to protect confidentiality in tabulations vary, depending on the type of data.

Noise infusion is the Census Bureau's preferred disclosure avoidance technique. By policy, noise infusion is applied to all data products that are reported with geographies smaller than a state. Noise infusion may be required for microdata releases, depending on the characteristics of the microdata and the specific variables that are to be released. Data that cannot be publicly released may still be analyzed within the Federal Statistical Research Data Centers (FSRDCs) by individuals who have Special Sworn Status; the results of such analyses must still go through a disclosure avoidance process prior to being publicly released.

The parties understand that Title 13 confidentiality protection and disclosure avoidance techniques apply to all work described in this agreement. The disclosure avoidance disclosure methods are defined by the Census Bureau who has the responsibility of carrying out that work. Accordingly, upon completion of the tabulation, the data produced must be reviewed by the Census Bureau to ensure that no identifiable Title 13 data are or may be disclosed. Should the Census Bureau's Disclosure Review Board (DRB) determine that the requested statistical product does or reasonably could result in such disclosure, then the data product will be modified prior to approval for release to the party(ies) of this agreement. The DRB must approve before a research product can be released to an individual who does not have Special

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000298

Sworn Status (SSS) and a need to know, or moved to a computer not approved for controlled data according to Census' existing policies and procedures.

No attempt will be made to identify an individual employee for any purpose, and tabulations drawn from 4 or fewer individuals will be suppressed to protect against inadvertent statistical disclosure of such information. The Census Bureau in producing statistical reports must adhere to the above guideline or an equivalent alternative disclosure avoidance protocol that has been approved by both the Census Disclosure Review Board and OPM.

I. The Census Bureau will comply with the requirements of the Federal Information Security Management Act (FISMA), 44 U.S.C. Chapter 35, Subchapter II, as amended by the Federal Information Security Modernization Act of 2014 (Pub. L. 113-283); related Office of Management and Budget (OMB) circulars and memoranda, such as Circular A 130, Managing Information as a Strategic Resource (July 28, 2016), and Memorandum M-17-12, Preparing for and Responding to a Breach of Personally Identifiable Information (January 3, 2017); National Institute of Standards and Technology (NIST) directives; and the Federal Acquisition Regulations, including any applicable amendments published after the effective date of this agreement. These laws, directives, and regulations include requirements for safeguarding Federal information systems and personally identifiable information (PII) used in Federal agency business processes, as well as related reporting requirements. FISMA requirements apply to all Federal contractors, organizations, or entities that possess or use Federal information, or that operate, use, or have access to Federal information systems on behalf of an agency.

The National Institute of Standards and Technology (NIST) Special Publication 800 37, as revised, encourages agencies to accept each other's security assessments in order to reuse information system resources and/or to accept each other's assessed security posture in order to share information. NIST 800-37 further encourages that this type of reciprocity is best achieved when agencies are transparent and make available sufficient evidence regarding the security state of an information system so that an authorizing official from another organization can use that evidence to make credible, risk-based decisions regarding the operation and use of that system or the information it processes, stores, or transmits. Consistent with that guidance, the Census Bureau agrees to make available to OPM upon request system security evidence for the purpose of making risk-based decisions. Requests for this information may be made at any time throughout the duration or any extension of this agreement.

J. Cloud providers must be approved for at least moderate level information through the GSA FedRAMP process prior to acquiring any services. Census Bureau identifies, assesses and authorizes use based on the published FedRAMP results and an assessment of any Census Bureau (customer provided) controls implemented to protect the infrastructure and data. Security reporting on cloud providers is reported to the Department of Commerce on a regular basis under FISMA.

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000299

k. The Census Bureau maintains a policy regarding the reporting of and response to losses of protected data in accordance with OMB Memorandum M-17-12. Known or suspected losses of protected data must be reported within one hour of its discovery to the Bureau of the Census Computer Incident Response Team (BOC CIRT) who will report as required to the United States Computer Emergency Readiness Team (US CERT).

Census Bureau must report information security incidents where the confidentiality, integrity, or availability of a federal information system is potentially compromised to US-CERT within one hour of being identified. Census Bureau shall also immediately thereafter follow Census Bureau's incident reporting procedures and Census Bureau shall immediately notify the OPM Security Operations Center at 844-377-6109 or CyberSolutions@opm.gov of all information security incidents and breaches. In addition, Census Bureau will notify OPM's Points of Contact named in this agreement.

Census Bureau will provide OPM all information and status updates discovered during the investigation of the cyber incident. Census Bureau will follow its Cyber Incident Response Plan, as required by OMB M-16-04 and M-17-12. Census Bureau may request assistance from or turn over the cyber incident investigation to DHS and FBI in accordance with the applicable Cyber Incident Response Plan.

When reporting a breach or incident to the OPM Security Operations Center by email:

1. Do not include any PII or sensitive information in the subject or body of the email;
2. Use FIPS 140-2 compliant encryption methods to protect PII or sensitive information to be included as an email attachment, and do not include passwords in the same email as the encrypted attachment; and
3. Provide any supplementary information or reports related to a previously reported incident directly to the OPM Security Operations Center with the following text in the subject line of the email: "Supplementary Information/Report related to previously report incident #[insert number]."

Census Bureau and OPM will follow PII breach notification policies and related procedures of OMB M-17-12, as appropriate. Appropriate notice, remediation efforts, and responsibility for related costs will be determined based on the circumstances of the incident.

l. Requests by private interests for any information provided to Census Bureau under this MOU will be forwarded to the OPM's Data Analysis Group for review and response. Nothing in this MOU shall prevent a party from complying with an order of a court of the United States or, if compliance is deemed compulsory, a request or demand from a duly authorized committee of the United States Senate or House of Representatives. In the event that Census Bureau receives a congressional request or a court order for access to data contained in the files, Census Bureau will provide the Data Analysis Group written notice of the request in advance of disclosure.

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000300

m. The Census Bureau will notify the Data Analysis Group of any apparent errors or discrepancies in the information provided to Census Bureau under this MOU.

n. Published material resulting from the provision of information to Census Bureau under this MOU will identify the source of the information as: OPM, Enterprise Human Resources Integration Data Warehouse Statistical Data Mart. Information/Data that can be combined with other public data sources to re-identify individuals cannot be published.

o. All of the conditions pertaining to security and privacy will apply if information provided to Census Bureau under this MOU is co-mingled with other system/data elements. Census Bureau will make no effort to merge the requested data with any further data in an attempt to re-identify individuals represented in EHRI/SDM data.

p. Census will destroy the Social Security Number (SSN)-laden files once the protected identification key (PIK) is applied.

OPM agrees that:

q. Upon a request from Census Bureau for data as described in this MOU, it will provide such data to Census Bureau within 30 days of availability.

r. The Data Analysis Group, in coordination with Data Management of OCIO, will consult with relevant Census Bureau personnel on appropriate EHRI/SDM data structures and data use, qualifying data quality factors concerning agency submissions to EHRI/SDM, and consistency of population coverage with other OPM data releases.

s. OPM will provide Census Bureau with the requested data on a quarterly basis for the next three years following execution of this agreement.

t. The Data Analysis Group will provide advice to relevant Census Bureau personnel on data quality assurance and on data interpretations and analysis upon Census Bureau request.

u. OPM will put the encrypted/password protected data on disks and mail it via UPS to a designated Census Bureau point of contact. Census Bureau will contact OPM to obtain the password for unlocking the data files.

5. General Provisions.

a. Period of Agreement: This MOU will become effective upon the signature of both parties and will remain in effect for a period of three years from the date of this Agreement or until either party terminates the Agreement by giving 60 days' notice of intent to terminate. The parties may renew this Agreement in increments of three years. This MOU explicitly

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000301

supersedes the five-year DUA signed between Census Bureau and OPM in 2014 that covered data files for years 1990-2005.

b. Amendments: Amendments, including additions, deletions, or modifications to this MOU, may be proposed in writing by either party for the other party's consideration. If both parties agree to the revision, OPM will amend the existing MOU and forward it to Census for signature. Any agreed-upon revisions will be considered part of this MOU prior to their formal incorporation.

6. Points of Contact (POC).

The OPM POC for this agreement is Kareen Currey, telephone number (202) 606-0047, and e-mail: Kareen.Currey@opm.gov. The Census Bureau POC for this agreement is Kimberly M. Jones-Ruiz, Ph.D., telephone number (301) 763-8689, and e-mail Kimberly.M.Jones@census.gov.

11/26/19

Lance Harris — Date
Manager, Data Analysis Group
Office of Strategy and Innovation
U.S. Office of Personnel Management

11/19/19

Kevin Deardorff — Date
Chief, Economic Reimbursable Surveys Acting
Assistant Center Chief and Lead Division, ERD
U.S. Census Bureau

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000302

Attachment 1

Enterprise Human Resources Integration
(EHRI) – Statistical I Data Elements

A complete listing of all data elements contained in the Status and Dynamics files can be found at https://www.opm.gov/policy-data-oversight/data-analysis-documentation/data-policy-guidance/#url=Data-Standards.

DESCRIPTION OF THE DATA

EHRI – DW is the OPM source system for the OPM subsystem – Enterprise Human Resources Integration (EHRI) – Statistical Data Mart (SDM), which contains the following four file types for Calendar Years 2006-2017:

- Status File
- Dynamics File
- Personnel Office Identifier (POI)
- File Standard Code Table (SCT) File

The Census Bureau will be requesting this data on a quarterly basis. The Foreign Keys of the data elements will also be sent to the Census, so they can be used to match with the translation tables.

The below represents the most frequently used items and the U.S. Census Bureau's requested data elements. The column "Confidentiality" status identifies the current status of a Data Element with respect to existing OPM data products and as per OPM Data Release Policy, identified elsewhere in this document.

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000303

Data Element	Confidentiality
Agency Sub-element	Public-use
Agency	Public-use
Sub-element	Public-use
Date of Birth (yyyymm)	Protected
Duty Station	Maybe based on OPM data redaction policy.
Occupation	Public-use
Occupational Category	Public-use
Pay Basis	Public-use
Grade	Public-use
Pay Plan	Public-use
Race/National Origin	Protected
Basic Pay	Public-use
Service Comp Date (yyyymm)	Protected
Sex	Protected
Supervisory Status	Public-use
Tenure	Public-use
Type Appointment	Public-use
Veterans Preference	Protected
Work Schedule	Public-use

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000304

Attachment 2

Enterprise Human Resources Integration (EHRI) – Statistical Data Mart (SDM) Data Elements.

Instructional Program	Protected
Annuitant Indicator	Protected
As Of Date (yyyymm)	Protected
Bargaining Unit	Protected
Creditable Military Service	Protected
Current Appt Auth 1	Protected
Current Appt Auth 2	Protected
Education Level	Public-use
FLSA	Protected
Frozen Service	Protected
Functional Class	Protected
GS-Related Grade	Public-use
Handicap	Protected
FEGLI	Protected
Health Plan ,	Protected
Organizational Component	Protected
Pay Rate Determinant	Protected
Pay Status	Protected
Rating of Record Level	Protected
Personnel Office Id	Protected
Position Occupied	Public-use
Retained Grade	Protected
Retained Pay Plan	Protected
Retained Step	Protected
Retirement Plan	Protected
Social Security Number	Protected, PII
Step/Rate	Protected
US Citizenship	Protected
Veteran Status	Protected
Yr Degree Cert Attained	Protected

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000305

Attachment 2

Enterprise Human Resources Integration (EHRI) – Statistical Data Mart (SDM) Data Elements.

Adjusted Basic Pay	Public-use
Total Pay	Protected
FERS Coverage	Protected
CSA	Protected
Locality Adjustment	Protected
Locality Pay Area	Protected
CBSA	Public-use
Supervisory Differential	Protected
Retention Allowance	Protected
COLA	Protected
Special Pay Table Id	Protected
Consolidated MSA Retro	Public-use
Senior Pay Levels Ind	Protected
Leo Geo Retro	Protected
Rating of Record Pattern	Protected
Rating of Record Period	Protected
ERI (Ethnicity/Race Indicator)	Protected
ERI Bridge	Protected

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000306

Attachment #3

THE U.S. OFFICE OF PERSONNEL MANAGEMENT

DATA RELEASE POLICY

November 2018

The U.S. Office of Personnel Management (OPM) endeavors to make a wide range of workforce information and reports readily available to the public. This document outlines OPM policy governing the release of information concerning Federal civilian employees. The policy is consistent with 5 C.F.R. part 293, OPM's regulation concerning Personnel Records. OPM continues to comply with the Freedom of Information Act and the Privacy Act when releasing information.

Data at the individual record level with employee name:

Pursuant to 5 C.F.R. § 293.311, certain information collected in the Statistical Data Mart (SDM), formerly the Central Personnel Data File (CPDF), or Enterprise Human Resources Integration (EHRI) database concerning Federal employees and former employees will be released to the public at the individual record level with respect to most employees. The categories of information which may generally be released are: name, job title, grade level, position description, duty station, and salary. Although the referenced information regarding most present and former Federal employees is available to the public, certain information will be withheld under Exemption 6, as constituting a clearly unwarranted invasion of privacy.

Pursuant to this policy, the Federal Bureau of Investigation, the Drug Enforcement Administration, the Bureau of Alcohol, Tobacco, Firearms and Explosives, the Alcohol and Tobacco Tax and Trade Bureau, the United States Mint, United States Secret Service, and all U.S. Attorneys' Offices are collectively referred to as security/sensitive agencies. Responses to requests for record level data of employees in security/sensitive agencies will have identities and organizational components codes redacted.[1] Duty stations for employees of those agencies working in the Washington Core Based Statistical Area (CBSA) will be recoded as "Washington, D.C." Duty stations for employees of those agencies working outside of the Washington CBSA will be redacted. For employees of these agencies working in sensitive occupations, identities, duty stations and organizational component codes will be redacted. For any employee whose duty station is redacted, the related location data ELEMENTS (CBSA, Combined Statistical Area, adjusted basic pay, and locality pay area) will also be redacted. Within the Department of Homeland Security is an organizational component, "HS 0504 Under Secretary for Intelligence and Analysis & Chief Intelligence Officer," for which OPM releases employee record level data in the same manner as a security/sensitive agency.

[1] As of September 2008, all names of employees in sensitive/security agencies, except U.S. Attorneys' Offices, are withheld by HR service provider, not by OPM.

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000307

The United States Department of Defense (DoD) has implemented a security based policy for release of individual level data on DoD employees. A request to OPM for information concerning DoD employees that requests data at the individual record level will be forwarded to DoD for an appropriate response in accordance with DoD's policy.

The Internal Revenue Service (IRS) has adopted a Registered Pseudonym Program. In light of that program, OPM will refer requests for names of IRS employees to the IRS for a direct response. Requests for other information concerning IRS employees will be processed by OPM.

OPM does not release information about whether positions are coded for cybersecurity category/specialty area.

Whenever an employee's name is released, information collected concerning the following data elements will be withheld: social security number; date of birth; disability status; race and national origin, ethnicity and race indicator (ERI), and the OPM ERI bridge (a code used to translate previous race and national origin reporting to the new format of race and ethnicity); gender; United States citizenship status; annuitant status; Federal Employees Health Benefits Program data; Federal Employees Group Life Insurance data; Federal Employees Retirement System coverage; frozen Civil Service Retirement System service; retirement plan; veterans' preference; year degree attained; performance rating level; current appointment authority; legal authority; dynamics category (broad categories of accessions, separations, and terminations); and previous retirement coverage.

The preceding data elements may also be withheld from release in de-identified (record level with name removed) datasets in order to mitigate the risk of re-identification.

Nature of Action codes describing adverse actions are not released (Nature of Action codes 330, 385, 450, 452, 713, 888, and 897). Releasable award actions are limited to Nature of Action codes 841-844, 849, 878, 887, and 889 only. Performance rating-based awards (Nature of Action codes 840, 871, 879, 885, and 886) are not included. OPM withholds the foregoing Nature of Action codes under Exemption 6 of FOIA as a clearly unwarranted invasion of personal privacy.

Release of names, duty stations, CBSA codes, CSA codes, locality pay areas, adjusted basic pay, and/or organizational components will be withheld when employees are in the following occupations, deemed sensitive:

- 0007 – Correctional Officer
- 0082 – United States Marshal
- 0083 – Police
- 0084 – Nuclear Materials Courier
- 0132 – Intelligence
- 0134 – Intelligence Clerk/Aide
- 0401 – General National Resources and Biological Science (United States Department of Homeland Security only)

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000308

- 0436 – Plant Protection and Quarantine (although this series has been discontinued, it remains on this list to prevent disclosure of data from the period in which it applied)
- 0512 – Internal Revenue Agent
- 0840 – Nuclear Engineering
- 0930 – Hearings and Appeals
- 1169 – Internal Revenue Officer
- 1171 – Appraising (Property Appraisal and Liquidation Specialist – Internal Revenue Service only)
- 1801 – General Inspection, Investigation, Enforcement and Compliance
- 1802 – Compliance Inspection and Support
- 1805 – Investigative Analysis
- 1810 – General Investigating
- 1811 – Criminal Investigating
- 1812 – Game Law Enforcement (cancelled March 2009 and employees reclassified to 1801 and 1811 – although this series has been discontinued, it remains on this list to prevent disclosure of data from the period in which it applied)
- 1816 – Immigration Inspection (cancelled March 2009 and employees reclassified to 1895 – although this series has been discontinued, it remains on this list to prevent disclosure of data from the period in which it applied)
- 1854 – Alcohol, Tobacco, and Firearms Inspection (cancelled March 2009 and employees reclassified to other appropriate but undesignated series – although this series has been discontinued, it remains on this list to prevent disclosure of data from the period in which it applied)
- 1881 – Customs and Border Protection Interdiction
- 1884 – Customs Patrol Officer (cancelled March 2009 and employees reclassified to 1801 – although this series has been discontinued, it remains on this list to prevent disclosure of data from the period in which it applied)
- 1890 – Customs Inspection (cancelled March 2009 and employees reclassified to 1895 – although this series has been discontinued, it remains on this list to prevent disclosure of data from the period in which it applied)
- 1895 – Customs and Border Protection
- 1896 – Border Patrol Enforcement

In an effort to provide transparency regarding monetary compensation for employees in security/sensitive agencies or sensitive occupations, OPM will provide base pay and a separate total compensation field. The total compensation field will be the sum of adjusted basic pay and all award data elements, including those not otherwise releasable. Due to this change, OPM will no longer provide a separate awards data field for these employees. In addition, OPM may withhold salary, bonus or other related information for any employee (whether or not in a security/sensitive agency or occupation) whose performance rating(s) may be reverse engineered from release of such records.

Summary level data

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000309

Pursuant to the statutes, Executive Orders, and regulations that govern OPM's authorities and responsibilities, OPM periodically issues reports concerning the Federal workforce. OPM will release summary level data unless it appears that the presentation of that data will permit the identification of individual employees.

OPM makes a version of a tool called FedScope available to the public. The public version of that tool currently permits the user to "drill down" through the data only to the level of statewide information. References to Metropolitan Statistical Areas were removed as of March 2004.

Although OPM will release summary level data for all agencies, data for sensitive occupations will not be released for any level below statewide.

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000310

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
IHS PATIENT REGISTRATION DATA
FROM THE INDIAN HEALTH SERVICE (IHS)

Agreement No. 2064-FY20-NFE-0339

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Indian Health Service (IHS), a component of the U.S. Department of Health and Human Services (HHS), for the acquisition of IHS Patient Registration data file(s). In order to ensure the integrity, security, and confidentiality of information maintained by the IHS, and to permit appropriate disclosure and use of such data as permitted by law, IHS and the Census Bureau, hereinafter collectively termed the "Parties," enter into this Agreement. This Agreement addresses the conditions under which IHS will disclose and the Census Bureau will obtain, use, reuse, and disclose the IHS data file specified in Attachment B (Data File(s)) and/or any derivative file(s) that contain direct individual identifiers or elements that can be used in concert with other information to identify individuals.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The Census Bureau's Health Insurance Portability and Accountability Act (HIPAA) Privacy Board approved the research protocols specified in Attachment C and also issued a Waiver of the HIPAA Privacy Rule's Authorization Requirements on November 13, 2019 (See Attachment A).

Disclosure of the Data File(s) is made pursuant to:

a. HIPAA: 45 C.F.R. § 164.512(i)(1) – disclosures for research purposes

b. Privacy Act: 5 U.S.C. § 552a(b)(3); IHS Medical, Health, and Billing Records, System No. 09–17–0001, System of Records Notice, Routine Use #9.

3. TERMS AND CONDITIONS

Pursuant to this agreement, the IHS will transfer the Data File(s) to the Census Bureau and the Census Bureau agrees to protect the Data File(s) as confidential in accordance with applicable law. To the extent provided by law, only Census Bureau staff and those Special Sworn Status ("SSS") researchers participating in the research will have access to the data. Access shall be limited to the minimum number of individuals necessary. Any data, records, or other

AMERICAN OVERSIGHT

information shared through this research agreement are protected from unauthorized disclosure. The Census Bureau represents, and in furnishing the Data File, IHS relies upon such representation, that the Data File(s) will be used solely for the research purposes set forth in Attachment C and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it may not be disclosed in individually-identifiable form that permits the identification of any individual or contains any combination of data elements that might allow the deduction of an individual's identity.

The Census Bureau will link the IHS Patient registration data to census data, survey data and administrative records data. To the extent provided by law, the Census Bureau will recognize the program agency as the owner of the original data in the form that it is delivered to the Census Bureau, prior to its integration with confidential Census data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the Patient registration data to provide new and improved estimates of population characteristics related to citizenship.

The Parties mutually understand and agree that in performing their respective duties and obligations under this Agreement, the Parties are at all times acting as separate entities with respect to each other. Nothing in this Agreement shall constitute or be construed to create a business associate arrangement, partnership, joint venture, an agency relationship, or any form of organized health care arrangement between the Parties. Neither Party shall use the name of the other Party in any publicity, advertising, or news release without the prior written approval of the authorized representative of the other Party. Furthermore, nothing expressed or implied in this Agreement is intended or shall be deemed to confer upon any individual or entity other than the Parties, any rights, obligations, remedies, or liabilities. User does not have the right to assign or transfer its rights to any third party, including agents or subcontractors, under this Agreement.

This Agreement supersedes any and all agreements between the Parties with respect to the use of the Data File(s) described herein, and preempts and overrides any unwritten or preceding instructions, directions, agreements, or other understanding in or pertaining to any grant award or other prior communication from DHHS or any of its components with respect to the data specified herein.

a. IHS agrees:

   i. To transfer to the Census Bureau via secure method such as the IHS Secure Data Transfer Service (SDTS) or appropriately encrypted CD-ROM or DVD-ROM, the first delivery of data as described in the Variable List in Attachment B as soon as possible after this MOU is signed by both parties. A second delivery of data will be made with a cut date of April 1, 2020, to arrive at the Census Bureau prior to July 31, 2020. Beginning in 2021 and for the remainder of the period of performance, annual deliveries with an April 1 cut date will arrive at the Census Bureau by July 31 for each of those years.

   ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this

AMERICAN OVERSIGHT

agreement; including a record layout, record count, record length and data dictionary.

iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the Data File(s). Record linkage identifiers may not contain any IHS Patient registration data or direct identifiers.

iv. To allow the Census Bureau staff and SSS researchers to use the Data File(s) for the projects listed in Attachment C or those approved in writing by both parties.

b. The Census Bureau agrees:

i. To the extent provided by law, to grant access to the Data File(s) only to Census Bureau staff and SSS researchers only for the research projects listed in Attachment C or those approved in writing by both parties. The Census Bureau agrees to ensure that access by such individuals complies with the terms of this Agreement and shall be limited to the minimum amount of data and minimum number of individuals necessary to achieve the purpose(s) stated in this Agreement (i.e., individual's access to the data will be on a need-to-know role-dependent basis).

ii. The Census Bureau affirms that the requested data is the minimum necessary to achieve the research purposes listed in Attachment C.

iii. The Census Bureau agrees to ensure the integrity, security, and confidentiality of the data files by complying with the terms of this Agreement and applicable law.

iv. The Census Bureau represents that, except as specified in this Agreement or except as IHS shall authorize in writing, the Census Bureau shall not disclose, release, reveal, show, sell, rent, lease, loan, or otherwise grant access to the data files covered by this Agreement to any person(s) except as required by law. The Census Bureau agrees to notify IHS if it feels it is legally obliged to release the Data File(s), thereby affording IHS an opportunity to assert that such release is not legally required.

v. The Census Bureau acknowledges that the use of unsecured telecommunications, including the Internet, to transmit individually identifiable, or deducible information derived from the Data File(s) is prohibited. Further, the Census Bureau agrees that the data must not be physically moved, transmitted or disclosed in any way from or by the Custodian in this Agreement without written approval from IHS, unless such movement, transmission or disclosure is required by a law.

vi. Without limiting any other provision of this Agreement, the Census Bureau agrees to be responsible for all of its actions taken or not taken from or related to use of the Data Files(s), including inaccurate or incomplete Data.

vii. The Census Bureau agrees that the information received through this agreement shall not be used for any purposes that would qualify as a "matching program" under 5 U.S.C. 552a.

AMERICAN OVERSIGHT

viii. The Census Bureau agrees that, absent express written authorization through this Agreement or the appropriate IHS POC to do so, the Census Bureau shall not attempt to link records included in the Data File(s) to any other individually identifiable source of information. This includes attempts to link to other IHS data files.

ix. The Census Bureau agrees that in the event IHS determines or has a reasonable belief that the Census Bureau has made or may have made a use, reuse or disclosure of the aforesaid file(s) that is not authorized by this Agreement, IHS, at its sole discretion, may require the Census Bureau to: (a) promptly investigate and report to IHS the Census Bureau's determinations regarding any alleged or actual unauthorized use, reuse or disclosure, (b) promptly resolve any problems identified by the investigation; (c) if requested by IHS, submit a formal response to an allegation of unauthorized use, reuse or disclosure; (d) if requested by IHS, submit a corrective action plan with steps designed to prevent any future unauthorized uses, reuses or disclosures; and (e) if requested by IHS, return data files to IHS or destroy the data files it received from IHS under this agreement. The Census Bureau understands that if IHS determines or has a reasonable belief that any unauthorized uses, reuses or disclosures have taken place, IHS may refuse to release further IHS data to the Census Bureau for a period of time to be determined by IHS.

x. The Census Bureau understands and agrees that they may not reuse original or derivative data file(s) without prior written approval from the appropriate IHS POC, unless otherwise permitted by this agreement.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the Data File(s), who will in a representative capacity, comply with all of the designated provisions of this agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the agreement to prevent unauthorized use. The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the IHS and the Census Bureau, respectively:

IHS POC:

RADM Francis Frazier
Director
Office of Public Health Support
5600 Fishers Lane, 9E10D
Rockville, MD 20857
301-443-9531
Francis.frazier@ihs.gov

Census Bureau POC:

Michael Berning
Assistant Division Chief
Economic Reimbursable Surveys Division (ERD)

AMERICAN OVERSIGHT

U.S. Census Bureau
4600 Silver Hill Rd
Suitland MD 20746
301-763-2028
michael.a.berning@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement shall terminate three (3) years following the date on which it becomes effective. If, at the end of three (3) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this agreement whenever a Federal statute is enacted that materially affects the substance of the agreement, **in order to determine whether it should be revised, renewed or canceled.** The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the IHS.

Notwithstanding all other provisions of this agreement, the Parties agree that:

a. This agreement may be amended at any time by written mutual consent of both parties.

b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

6. DATA RETENTION

The original data received from the IHS will be retained by the Census Bureau for a maximum of two (2) years, after which Census will expunge the original data from its systems, so long as expungement is not inconsistent with Federal law. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the Data File(s) will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of records with linkage identifiers and IHS Patient Registration data linked to other data as part of the projects described in Attachment C will not be discontinued due to expiration or termination of this agreement.

To promote organizational transparency, and in support of data discovery for current and future research projects, the U.S. Census Bureau posts non-sensitive data documentation to public-facing websites. This documentation, such as a record layout or data dictionary, can include file descriptions, variable lists, variable labels and valid values for each variable.

7. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s)

AMERICAN OVERSIGHT

of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

The Census Bureau will promptly consider and adjudicate, in accordance with Federal law, claims which may arise for damages of any nature arising out of a Census Bureau act under this agreement. Such adjudication will be pursued under the Federal Tort Claims Act, 28 U.S.C. Section 2671 et seq., the Federal Employees Compensation Act, 5 U.S.C. Section 8101 et seq., or such other legal authority as may be pertinent. The U.S. Department of Justice shall determine the appropriate venues for any litigation arising under this agreement.

8. CONFIDENTIALITY

A. IT Security Language

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence and to use the Data File(s) solely for the research protocols listed in Attachment C. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with the National Institute of Standards and Technology (NIST) Federal Information Processing Standards (FIPS) 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "Recommended Security Controls for Federal Information Systems and Organizations," as well as Special Publication 800-37r1 "Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO as well as the Department of Commerce Office of Inspector General as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "Standards for Security Categorization of Federal Information and Information Systems" and NIST Special Publication 800-60r1 "Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices." Security controls and subsequent assessments are done based on the final categorization.

Cloud providers must be approved for at least moderate level information through the GSA FedRAMP process prior to acquiring any services. Census Bureau identifies, assesses and authorizes use based on the published FedRAMP results and an assessment of any Census Bureau (customer provided) controls implemented to protect the infrastructure and data. Security reporting on cloud providers is reported to the Department of Commerce on a regular basis under FISMA.

The Census Bureau maintains a policy regarding the reporting of and response to losses of protected data in accordance with OMB Memorandum M-17-12. Known or suspected losses of protected data must be reported within one hour of its discovery to the Bureau of the Census

AMERICAN OVERSIGHT

Computer Incident Response Team (BOC CIRT) who will report as required to the United States Computer Emergency Readiness Team (US CERT).

The Census Bureau agrees to report any breach of personally identifiable information (PII) or protected health information (PHI) (as defined in 45 C.F.R. § 160.103) from the IHS data file(s), loss of this data or disclosure to any unauthorized persons to the IHS POC identified in this Agreement within one hour. The parties agree to cooperate fully in the federal security incident process.

B. Disclosure Language

Title 13, Section 9 of the United States Code (U.S.C.) requires the Census Bureau to keep confidential and the information collected from the public under the authority of Title 13. Section 214 of Title 13, U.S.C., and Sections 3551, 3559 and 3571 of Title 18, U.S.C., provide for the imposition of penalties of up to five years in prison and/or up to $250,000.00 in fines for wrongful disclosure of confidential census information.

Disclosure avoidance is the process for protecting the confidentiality of data, as required under Title 13 U.S.C. A disclosure of data occurs when someone can use published statistical information to identify an individual who has provided confidential information under a pledge of confidentiality. For data tabulations, the Census Bureau uses disclosure avoidance procedures to modify or remove the characteristics that put confidential information at risk for disclosure. Although a published table may appear to show information about a specific individual, the Census Bureau has taken steps to disguise or suppress the original data, while making sure the results are still useful. The techniques used by the Census Bureau to protect confidentiality in tabulations vary, depending on the type of data.

Noise injection is the Census Bureau's preferred disclosure avoidance technique. By policy, noise injection is to be applied to all data products that are reported with geographies smaller than a state. In cases when it is not feasible to fully implement noise injection within the period of the contract, a transition plan for implementing noise injection or other provable privacy methods must be developed in coordination with the Census Bureau. Noise injection may be required for microdata releases, depending on the characteristics of the microdata and the specific variables that are to be released. Data that cannot be publicly released may still be analyzed within the Federal Statistical Research Data Centers (FSRDCs) by individuals who have Special Sworn Status; the results of such analyses must still go through a disclosure avoidance process prior to being publicly released.

The parties understand that Title 13 confidentiality protection and disclosure avoidance techniques apply to all work described in this agreement, in addition to any other applicable privacy laws. The disclosure avoidance disclosure methods are defined by the Census Bureau who has the responsibility of carrying out that work. Accordingly, upon completion of the tabulation, the data produced must be reviewed by the Census Bureau to ensure that no identifiable Title 13 data are or may be disclosed. Should the Census Bureau's Disclosure Review Board (DRB) determine that the requested statistical product does or reasonably could result in such disclosure, then the data product will be modified prior to approval for release to the party(ies) of this agreement. The DRB must approve before a research product can be

AMERICAN OVERSIGHT

released to an individual who does not have SSS and a need to know, or moved to a computer not approved for controlled data according to Census' existing policies and procedures.

9. APPROVALS

(Date) 2/10/2020

Kevin Deardorff
Chief, Economic Reimbursable Surveys Division
U.S. Census Bureau

(Date) 07FEB2020

RADM Michael D. Weahkee, MBA, MHSA
Assistant Surgeon General, U.S. Public Health Service
Principal Deputy Director
Indian Health Service

AMERICAN OVERSIGHT

Attachment A HIPAA Waiver Approval

UNITED STATES DEPARTMENT OF COMMERCE
U.S. Census Bureau
Washington, DC 20233-0001

November 13, 2019

MEMORANDUM FOR: Michael Berning
Assistant Division Chief for Data Acquisition and Curation
Economic Reimbursable Surveys Division
U.S. Census Bureau

From: Christa D. Jones
Chair, HIPAA Privacy Board
U S Census Bureau

Subject: Waiver of the Authorization Requirement for the U.S. Census Bureau's Acquisition and Use of the Indian Health Service's Patient Registration File

I am pleased to inform you that on November 13, 2019 the U.S. Census Bureau's Health Insurance Portability and Accountability Act (HIPAA) Privacy Board reviewed request CEN-HPB-005 for a full waiver of the HIPAA Privacy Rule's Authorization Requirement so that the agency may acquire patient registration data from the Indian Health Service (IHS) and use these data in its statistical programs. This waiver applies to a one-time delivery in 2019 of records covering the years 2017-2019, and then regularly scheduled single-year deliveries from 2020 through 2023. Specific terms that apply to this transfer and use of Protected Health Information (PHI) will be addressed in a data acquisition agreement between the Census Bureau and IHS.

The Privacy Board reviewed your request under normal procedures and determined that all of the specified criteria for issuing a full waiver of authorization have been met. The disclosure of protected health information from IHS to the Census Bureau for these research uses involves no more than minimal risk to the privacy of individuals, and they could not be practically conducted without the requested Waiver or access to and use of the PHI.

As authorized under 45 CFR Section 164.512(i)(1)(i)(B), on behalf of the Census Bureau's HIPAA Privacy Board I hereby waive the requirement for individual authorization to disclose these patient registration data maintained by IHS to the U.S. Census Bureau for use in their statistical programs.

If you have any questions or concerns please contact Michael Castro, Chief, Policy and Data Stewardship Branch at (301) 763-6280 or at michael.castro@census.gov.

Christa D. Jones

11.13.19
Date

United States Census Bureau

census.gov

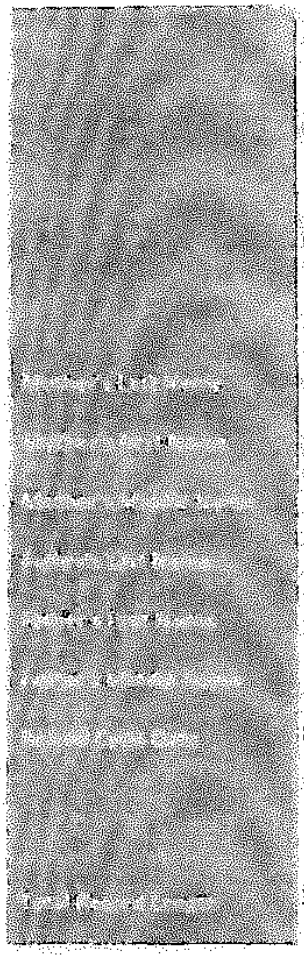
AMERICAN OVERSIGHT

Attachment B: Variable List Record Layout for the Indian Health Service (IHS) Patient Registration File

Field Name	Length	Comment
[illegible]	30	
[illegible]	30	
[illegible]	30	
[illegible]	50	
[illegible]	30	
[illegible]	2	Standard Postal Abbreviation
[illegible]	5	
[illegible]	4	
[illegible]	8	(MMDDCCYY)
[illegible]	1	M or F
[illegible]	3	3-digit Indian Health Service (IHS) code to indicate tribal affiliation.
[illegible]	9	
[illegible]	1	May contain various codes, but only "V" indicates SSN was verified by the Social Security Administration as belonging to the person described by name, sex, and date of birth.
[illegible]	1	Y or N. Whether the person is considered by standard HIS rules to be "Indian"
[illegible]	7	SSCCCOM

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000320



[redacted]	30	Maiden Name
[redacted]	30	
[redacted]	30	
[redacted]	30	
[redacted]	30	
[redacted]	30	
[redacted]	8	MMDDCCYY – Indicates when the information for the person was known to be last reviewed/updated at the registering medical facility.
[redacted]	399	

State = 2-digit IHS code

County = 2-digit IHS code

Community = 3-digit IHS code

(Note: IHS communities do not necessarily equate to the CITY indicated in the mailing address above)

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000321

Attachment C: Description of Approved Research Projects

1. Project to use Administrative Records Data to Support Executive Order 13880

The Census Bureau plans to use several administrative data sources of citizenship status in a statistical model that will produce a probability of being a U.S. citizen on April 1, 2020 for each person in the 2020 Census. The citizenship probability will be used together with age, race, ethnicity, and location information from the 2020 Census to produce Citizen Voting Age Population (CVAP) statistics. The objective of the project is to determine the number of citizens and non-citizens in the country.

Person records in each administrative and survey data source, including the 2020 Census, will be validated and assigned a unique person identifier, called a Protected Identification Key (PIK). The PIKs will be used to link each person's citizenship information to their 2020 Census record. The citizenship probability for persons in the 2020 Census without PIKs will be estimated based on local area information and the person's demographic characteristics, but not the person's citizenship, which makes the estimate much less accurate than if the person's citizenship information were available. The validation process (called the Person Identification Validation System (PVS)) involves comparing records to high-quality federal government sources (called reference files) using fields such as Social Security Number (SSN), name, date of birth, sex, and residential address. Currently, the reference files are limited to the Social Security Administration's (SSA's) Numident file and the Internal Revenue Service's (IRS's) Individual Taxpayer Identification Number (ITIN) file. Several million U.S. residents have neither an SSN nor an ITIN, however. Thus, even if such a person's information in an administrative or survey source is accurate, it will not be found in the reference files, no PIK will be assigned, and the person's citizenship probability will be estimated without the benefit of information about her/his citizenship status. Just because a person doesn't have a PIK does not necessarily mean the person doesn't have an SSN or ITIN, however. Records often contain errors in personally identifiable information (PII), missing information, or variants not seen in the reference files (e.g., a name or address change), leading to a failure to validate. Thus, imposing an assumption that all persons without PIKs are not U.S. citizens would lead to a significant underestimate of the number of citizens.

Once citizenship data sources and the 2020 Census person file have been assigned PIKs, the citizenship data will be linked to the 2020 Census person file. A model will be estimated for each person with a PIK, using the most current citizenship status from each available citizenship source for the person, as well as the person's other demographic, household, and location information as explanatory variables. The model will produce a citizenship probability for each person, which will then be combined with age, race, ethnicity, and location information from the 2020 Census to produce the Citizen Voting Age Population (CVAP) statistics.

Having more than one source of citizenship information is necessary, because no one source is complete and up-to-date. The SSA Numident contains citizenship status for most of the population. But the information is not always up-to-date for foreign-born persons. Prior to the 1970's people were not required to provide evidence of citizenship status when applying for an SSN. Thus, the citizenship status is blank for many older people in the Numident. Also,

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000322

naturalized citizens are not required to notify SSA about their naturalization. Thus, a naturalized citizen's SSA record may incorrectly say the person is not a citizen.

Having information about not only whether a person is a U.S. citizen or not at a point in time, but also their country of origin, visa status, and how long they have been in that status, could help predict naturalization at a later date, because naturalization rates vary across countries of origin, visa statuses, and lengths of time in status. This would be useful for estimating the current citizenship status for persons with citizenship information sometime in the past, but who lack current information.

Prior to producing citizenship statistics in the fall/winter of 2020-2021, the Census Bureau will do extensive testing of the citizenship models. Researchers will use past censuses and the American Community Survey (ACS) as person frames (in place of the 2020 Census), together with citizenship information from administrative sources in the same time periods. The testing will require historical data.

The administrative records data will both expand the coverage of persons with citizenship information in the 2020 Census and provide more up-to-date citizenship information for those already covered by other sources, resulting in more accurate statistics about the U.S. citizen population.

2. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the IHS data file(s) specified in Attachment B will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

3. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

A. validating and enhancing the Master Address File (MAF);[1]
B. designing and assigning resources to carry out the 2020 Census;[2]
C. unduplicating public, private, and census lists; and
D. imputing missing data.[3]

1 Census Bureau uses include updating and evaluating the Master Address File.
2 Data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.
3 Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000323

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000324

Execution Copy

MEMORANDUM OF UNDERSTANDING AND INTER-AGENCY AGREEMENT BETWEEN U.S. CENSUS BUREAU AND U.S. POSTAL SERVICE

This Memorandum of Understanding and Inter-Agency Agreement (the "MOU") is entered into by and between the U.S. Census Bureau (the "Census Bureau") and the U.S. Postal Service (the "Postal Service" or "USPS"). Capitalized terms used herein and in any exhibit hereto shall have the meanings ascribed to them in this MOU, unless otherwise noted.

I. General Terms

A. General Purpose

The Census Bureau has requested that the Postal Service supply it with certain change-of-address information received from the public for mail forwarding services. The Census Bureau needs this information for use in the administration of its responsibilities associated with its conduct of decennial census and survey programs.

In exchange, and within the legal restrictions governing the Census Bureau's release of data, the Census Bureau proposes to provide the Postal Service with information the Census Bureau has collected that is useful to the Postal Service's administration of the change-of-address data.

Therefore, the Postal Service and the Census Bureau have decided to enter into this MOU to document this agreement for the ongoing provision by USPS to the Census Bureau of change-of-address data.

B. Background and Legal Authority

The legal authority for entering into this MOU is contained in 39 U.S.C. § 412(b), also known as the Census Address List Improvement Act of 1994, which states that the "Postal Service shall provide to the Secretary of Commerce for use by the Bureau of the Census such address information, address-related information, and point of postal delivery information, including postal delivery codes, as may be determined by the Secretary to be appropriate for any census or survey being conduced by the Bureau of the Census."

AMERICAN OVERSIGHT

The Census Bureau's access to these data is also authorized under 13 U.S.C. § 6. This section of U.S.C. states that the Secretary of Commerce may request information from Federal Government establishments for the purposes of assisting the Census Bureau in the conduct of its work, including, but not limited to the decennial census.

The Census Bureau's authority to provide the requested data to the USPS is found in 13 U.S.C. § 8(b). 15 U.S.C. § 1525 and 13 U.S.C. §8(b) provide authority for the Census Bureau to engage in joint statistical projects with public and private entities. Further, the confidentiality of the USPS data is guaranteed under 13 U.S.C. § 9. Title 13 also provides for strong penalties for wrongful disclosure.

In a letter dated February 14, 2005 to the USPS, the Census Bureau stated its need of change-of-address data as being "for use in its intercensal estimate program, the development of the Master Address File, the Statistical Administrative Records System, and other products that support the Census Bureau's decennial census and survey programs."

C. USPS Change-of-Address System

Pursuant to 39 U.S.C. §§ 401 and 404, the USPS collects change-of-address information from the public for the purpose of providing mail forwarding services to customers who have moved. The change-of-address data is a system of records within the meaning of the Privacy Act, 5 U.S.C. § 552a. Accordingly, the USPS is prohibited from disclosing any information from that system of records except as provided in the Privacy Act and implementing USPS regulations.

D. Privacy Act of 1974

The Privacy Act of 1974, 5 U.S.C. § 552a establishes that Executive Branch agencies, as defined by 5 U.S.C. § 552(f), who maintain a "system of records" are subject to conditions of disclosure of any records contained in the system of records. Specifically, 5 U.S.C § 552a (b) states:

(b) Conditions of disclosure

> No agency shall disclose any record which is contained in a system of records by any means of communication to any person, or to another agency, except pursuant to a written request by, or with prior consent of, the individual to whom the record pertains, unless disclosure of the record would be – * * *

AMERICAN OVERSIGHT

(4) to the Bureau of the Census for purposes of planning or carrying out a census or survey or related activity pursuant to the provisions of Title 13;

II. Specific Terms And Conditions

A. Definitions

1. **"The Census Bureau Programs"** means the Census Bureau's intercensal estimate program, the Master Address File, the Statistical Administration Records System, and other products that support the decennial census and survey programs conducted by the Census Bureau.
2. **"Change-of-Address Data"** and **"COA Data"** mean the compilation of new mailing addresses for individuals or entities collected by USPS over the past four years. The information regarding new addresses typically consists of the information supplied by a user of USPS PS Form 3575, Change-of-Address Form. The current count of records is approximately one hundred sixty (160) million records.
   a. "COA Data" shall include
      i. both the Permanent and the Temporary change-of-address records the USPS possesses for the most recent four (4) years.
      ii. Deleted Records (defined below) as well as new or added records
   b. "COA Data" shall not include records received from Individuals who are classified as Court Ordered Protected Individuals.
3. **"COA Update(s)"** means the COA Data collected and prepared for distribution since the previous distribution of COA Data that is provided by USPS to the Census Bureau;
4. **"COA Original Information"** means the COA Data and/or the COA Updates supplied by USPS to the Census Bureau, except when the COA Data and/or the COA Updates (or portions thereof) are commingled with the Census Bureau's data systems for the Stated Purposes.
5. **"Deleted Records"** has the meaning ascribed to it in Section II, subsection D.
6. **"Format"** means a standard text format consisting of fixed length fields; USPS shall provide a file description that defines the organizational structure and the definition of specific fields; the media type shall be mutually agreed to by both parties.
7. **"Stated Purposes"** has the meaning set forth in Section II, Subsection B.

AMERICAN OVERSIGHT

Execution Copy

8. **"Territory"** means the United States of America, its territories, military bases and embassies.

B. Grant

USPS grants to the Census Bureau a non-exclusive, revocable license to the COA Original Information during the Term of this MOU in the Territory for use in the Census Bureau Programs to:

1. determine if a person or persons resides at an address currently maintained by the Census Bureau;
2. determine a new address of any person or persons for whom the Census Bureau already is in possession of that person's name and old address;
3. improve the quality and completeness of an address for which the Census Bureau already possesses the person's name and partially complete address;
4. perform statistical analysis as it relates to the conduct or survey of census; and
5. identify any addresses with the change-of-address data that the Census Bureau does not maintain currently within their Master Address File.

The foregoing enumerated uses of the COA Original Information are herein referred to as the "Stated Purposes."

C. The Scope of this Agreement

1. The scope of this MOU does not include a right to sublicense, assign, or transfer any part or all rights granted under it; any sublicense, assignment, or other transfer or attempt to do the foregoing shall be void.
2. The scope of this MOU does not include any right to develop or use the COA Original Information to artificially compile or maintain lists or histories of new movers.
3. The scope of this MOU does not include any expressed or implied right to display or distribute the COA Original Information. The scope of this MOU does not include any expressed or implied right to outsource the COA Original Information, except as provided for in Section IV Subsection B.

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000328

4. The scope of this MOU does not include any expressed or implied right to export the COA Original Information out of the Territory.

D. Fulfillment Frequency and Data Retention Terms

Within thirty days of the effective date hereof, the USPS shall provide to the Census Bureau a master copy of the COA Data.

At intervals agreed upon by the parties hereto, the USPS shall provide the Census Bureau with a COA Update. Each COA Update will include, in addition to change-of-address information that is new since the last delivery by USPS of data, a compilation of records for which either the 4-year retention period has elapsed or for which a subsequent transaction has been received that cancels or deletes an active record (herein "Deleted Records"). Upon receipt of a COA Update, the Census Bureau shall apply the transactions in the following manner: The Census Bureau shall remove all COA Original Information Deleted Records prior to the insertion of the new or added records and the Census Bureau shall not retain COA Original Information Deleted Records in any manner or form without prior notification and authorization in writing by the USPS Chief Privacy Officer and the USPS Senior VP Intelligent Mail & Address Quality or their authorized designees.

All fulfillment of COA Data shall be provided via USPS Express Mail. The USPS will provide all releases of the COA Data in a format encrypted using the Advanced Encryption Standard protocol. The Census Bureau shall be responsible for developing all software necessary to decrypt the COA Data based on the AES protocol. The encryption key necessary to perform decryption shall be transmitted separately from the COA Data for security purposes. The Census Bureau shall expect and be prepared to accommodate changes to the AES encryption/decryption key on a month-to-month basis.

III. USPS' Intellectual Property Rights

A. To the extent permitted by law, the Census Bureau agrees and acknowledges that USPS owns and retains all rights, title and interest in the intellectual property rights (including the right to create derivative works, modifications, and new compilations) in the COA Original Information, regardless of its form, format, or media.

B. The Census Bureau agrees and acknowledges that the COA Original Information is confidential, securely-protected proprietary property of USPS.

AMERICAN OVERSIGHT

Execution Copy

IV. Restrictions on the Census Bureau's Use and Disclosure of COA Original Information

A. The Census Bureau shall not use the COA Original Information outside the scope of this MOU for any purpose, including, without limitation, for the purpose of obtaining postage discounts for First-Class Mail entered into the USPS mail delivery system, or what is commonly known in the mailing industry as the Move Update Requirement, without the prior written approval of the Postal Service.

B. The Census Bureau shall employ the same protections it would for its own systems of records to safeguard from disclosure the COA Original Information in its possession. This includes restricting access to the COA Original Information to only those employees, contractors, or agents within the Census Bureau employ or service who have a compelling and legitimate business need to access the COA Original Information. The Census Bureau shall maintain an up-to-date and current accounting of all such authorized individuals and shall make such accounting available to USPS upon request. Such individuals shall maintain an appropriate level of security clearance as the Census Bureau routinely uses for its other sensitive and privacy-related data systems. The Census Bureau shall not disclose to any other person or external organization or other government agency the COA Original Information provided to it hereunder or any version or element of such COA Original Information. Upon termination of this MOU for any reason, the Census Bureau must completely erase and destroy any and all COA Data that is in the form of COA Original Information in its possession.

C. The Census Bureau shall not state, suggest, or infer publicly or to a third party that the Census Bureau's methodology to apply COA Data to Census Bureau data systems has been "endorsed by the United States Postal Service" or words to that effect or intended to have that meaning. While the Census Bureau may share with the statistical community the fact that COA Data has been provided to the Census Bureau by USPS, open disclosure of this fact to the general public will be limited to direct inquiries, and materials authored or presented by professional staff of the Census Bureau.

V. No Representations or Warranties

The Postal Service makes no representation or warranty as to the accuracy of the COA Data provided herein or as to its fitness for a particular purpose. Notwithstanding anything contained herein to the

AMERICAN OVERSIGHT

contrary, and to the extent permitted by Federal Law, nothing herein shall be construed to prevent USPS from pursuing, restrict USPS's right to pursue, or limit USPS's ability to recover with respect to, any and all claims it may have against the Census Bureau for breach of this Agreement and for any and all damages, losses, liabilities and expenses incurred by USPS, its employees, agents, representatives and members of the Board of Governors in connection therewith or related thereto.

VI. The Census Bureau's Provision of Data to USPS

A. The Census Bureau shall compensate USPS for the COA Data through the provision of information, as outlined below in this Section IV B and C. If, at a later date, USPS determines in its sole discretion that this exchange of information and services proves to be an unsatisfactory method of reimbursement, then USPS may require that the Census Bureau make payments in cash for some or all of the USPS' costs in providing the COA Original Information hereunder. Should the data exchanges cease, any subsequent release of the COA Data to the Census Bureau will be at a cost not-to-exceed $25,000.00 within a given calendar year.

B. In exchange for the COA Data, the Census Bureau shall supply to USPS information related to the administration of name and address data for the sole USPS purpose of improving and enhancing USPS administration of the change-of-address data. All Census Bureau information transmitted to USPS under this agreement shall be in aggregated form, i.e. non-individually-identifiable, in accordance with all legal restrictions governing the Census Bureau's release of data. The Census Bureau maintains a publicly available list of all custom tabulations that includes the names of the requesters and a brief description of the products. Once produced, custom tabulations also will be available upon request for the cost of reproduction.

Examples of the type of data sought by USPS include, but are not limited to:

1. Name Frequency Distribution Tables
2. Name Ethnicity Patterns and Variations
3. Name Gender Indicators
4. Geographic-Specific Name
5. Geographic Mobility Characteristics, Analyses, and Reports
6. Change-of-Address Data Quality Control Analysis Feedback

AMERICAN OVERSIGHT

C. To the extent permitted by Federal Law regarding the release/publication of the data, the Census Bureau shall share to the maximum extent possible other information, as it would relate to the USPS administration of the change-of-address data, within the legal restrictions governing the release of such information. The Census Bureau shall advise and inform the USPS of other such additional value in kind that the Census Bureau may offer from time to time.

D. The Census Bureau and USPS shall meet at the commencement of this MOU, and on or about each anniversary date thereafter to set the schedule on which such information will be supplied to USPS by the Census Bureau.

VII. Termination; Survival

A. Term

This MOU shall continue in effect until terminated by either party as provided herein the (the period during which this MOU is in effect being herein referred to as the "Term").

Either party may terminate this MOU at any time for any reason upon written notice from its designated representative to the designated representative of the other party. Termination will be effective within 90 days of the receipt of the notice or at such later date as is specified within the written notice.

B. Effect of Termination

Following receipt of a termination notice, both parties agree to fulfill, as reasonably practical and prior to the effective date of any such termination notice, all service commitments that are in process. Any project or service commitment hereunder which cannot reasonably be fulfilled prior to such effective date shall be terminated at the date of termination, unless the parties mutually agree otherwise in writing. The Census Bureau shall completely erase and destroy all COA Original Information in its possession upon any such termination.

Notwithstanding anything else contained herein to the contrary, USPS or the Census Bureau may terminate this MOU immediately, without obligation of any kind to fulfill service commitments or otherwise, in the event of a breach by USPS or the Census Bureau of the terms of this MOU.

AMERICAN OVERSIGHT

C. Survival

Section III "USPS' Intellectual Property Rights"; Section IV "Restrictions on the Census Bureau's Uses and Disclosures"; Section V "No Representation or Warranties"; and this Section VII "Termination; Survival" will survive any termination of this MOU.

VIII. Designated Representatives

For purposes of this MOU, the designated representative of the Postal Service shall be:

Janice E. Caldwell (or any successor)
janice.caldwell@usps.gov
Manager, Address Management
US Postal Service — (901) 331-4600 / Office
6060 Primacy Pkwy Ste 201 — (901) 767-8853 / FAX
Memphis TN 38188-0001

For purposes of this MOU, the designated representative of the Census Bureau shall be:

Sally M. Obenski (or any successor)
sally.m.obenski@census.gov
Assistant Division Chief, Administrative Records Research
U.S. Census Bureau — (301) 763-4044 / Office
4700 Silver Hill Rd Stop 9200 — (301) 457-3401 / FAX
Washington DC 20233-9200

IX. Modification

Performance of this MOU will be reviewed on an annual or more frequent basis by the parties hereto. This MOU may only be modified by a written agreement executed by duly authorized officer of each party hereto.

AMERICAN OVERSIGHT

Execution Copy

X. Signatures And Effective Date

The parties hereto hereby execute this MOU, which shall become effective on the later date of the two dates (if different) shown below.

US Postal Service

CHARLES E. BRAVO

SR VP Intelligent Mail & Address Quality

Date: 11-2-05

US Department of Commerce
US Census Bureau

CHARLES LOUIS KINCANNON

Director, U.S. Census Bureau

Date: 11-2-05

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000334

Modification 1
Interagency Agreement (Agreement No. 0094-2012-NFE-001) between the U.S. Census Bureau and the U.S. Department of Housing and Urban Development

THROUGH WHICH

THE U.S. CENSUS BUREAU WAS ACQUIRING

Calendar Year (CY) 2012-2017 Tenant Rental Assistance Certification System (TRACS) and the Public and Indian Housing Information Center (PIC) data

FROM

The U.S. Department of Housing and Urban Development

The purpose of the modification to the CY 2012-2017 Interagency Agreement (Agreement No. 0094-2012-NFE-001) between the U.S. Census Bureau (Census Bureau) and the U.S. Department of Housing and Urban Development (HUD) is to extend the data acquisition period and to acquire additional data files.

Therefore, replace Paragraph I in the original agreement with:

I. PARTIES AND PURPOSE

This Interagency Agreement (IAA) establishes an agreement between the U.S. Census Bureau (Census Bureau) and the U.S. Department of Housing and Urban Development (HUD) for the acquisition of Calendar Year (CY) 2015-2020 Tenant Rental Assistance Certification System (TRACS), the Public and Indian Housing Information Center (PIC), Computerized Homes Underwriting Management System (CHUMS), Low-Income Housing Tax Credit (LIHTC), and Federal Housing Authority (FHA) data for use in its intercensal estimates program, the Statistical Administrative Records System, and other activities that support the Census Bureau's decennial census and survey programs.

Replace Paragraph III in the original agreement with:

III. TERMS AND CONDITIONS

The information provided by HUD under this agreement is confidential under the Privacy Act of 1974, 5 U.S.C. § 552a, as amended. Title 13 U.S.C., Section 9, guarantees the continued confidentiality of data once acquired by the Census Bureau. The Census Bureau agrees that any information received under this agreement will remain confidential, that no data under this agreement will be disclosed in personally-identifiable form, and that all uses will be solely for statistical purposes.

Data transmitted to the Census Bureau will become a part of the Census Bureau's Statistical Administrative Records System (StARS) and is covered under the Census Bureau's System of Records Notice COM MERCE/CENSUS-8, StARS. As such, these records are subject to all requirements and

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000335

conditions of the Privacy Act of 1974.

To the extent authorized by federal law: When the Census Bureau publicly releases information pursuant to this agreement, it shall not identify any individual or business entity and all results will have met the Census Bureau disclosure avoidance guidelines. Full Title 13 confidentiality is provided to protect the identities of individuals in all items derived from program data until the data are destroyed. The Census Bureau agrees to allow HUD the ability to verify that findings, listings, information derived, or any combination of data extracted or derived from the HUD program data properly protects the identities of individuals.

Both parties acknowledge that substantial penalties exist for wrongful disclosure of HUD information provided under this agreement:

A. Unauthorized disclosure of the information provided under this agreement may violate the terms of 13 U.S.C., Section 9; 5 U.S.C., Section 552a; and 44 U.S.C., Section 3501. In the event of inconsistency, the parties agree that the most restrictive provisions of these statutes will apply in determining what constitutes an unauthorized disclosure.

B. The penalties stipulated for wrongful disclosure in l3 U.S.C., Section 214; 5 U.S.C., Section 552a; and 44 U.S.C., Section 3501 may include imprisonment for up to five years, a fine, or both.

C. Knowingly and willfully disclosing or obtaining records(s) under false pretenses may also violate provisions of 5 U.S.C., Section 552a, resulting in penalty. Taking or converting records(s) to one's own use or receiving the file(s) knowing they were stolen or converted may violate 18 U.S.C., Section 641, resulting in penalty.

By signing this agreement, the Census Bureau agrees to abide by all provisions set out in this agreement for protection of all information contained in the data file(s) and acknowledges having received notice of potential criminal, administrative, or civil penalties for violation of the applicable laws supporting the terms of the agreement.

Detailed file specifications and requirements of the Census Bureau's CY 2015-2020 request for the PIC, TRACS, CHUMS, LIHTC, and FHA data are provided in Enclosures A, B, C, D, and E. The Census Bureau will retain the original CY 2015-2020 PIC, TRACS, CHUMS, LIHTC, and FHA data for two (2) years from the date of receipt. The Census Bureau will have unlimited use and ownership of the PIC, TRACS, CHUMS, LIHTC, and FHA data after it is commingled with Title 13 data.

Replace Paragraph IV in the original agreement with:

IV. CONTACTS

The contacts of each party to this agreement are:

Agreement

Shawn J. Bucholtz
Director, Housing and Demographic Analysis Division
Office of Policy Development and Research

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000336

U.S. Department of Housing and Urban Development
451 Seventh Street, SW, Room 8222
Washington, DC 20410
202-402- 5538 Phone
shawn.j.bucholtz@hud.gov Email

Michael A. Berning, Supervisory Survey Statistician
Center for Administrative Records Research and Applications
U.S. Census Bureau
HQ-6H105
4600 Silver Hill Road
Suitland, MD 20746
301-763-2028 Phone
301-763-4310 Fax
Michael.A.Berning@census.gov Email

Data Custodian

Lydia B. Taghavi
Social Science Analyst,
Division of Program Monitoring and Research Office of Policy Development and Research
U.S. Department of Housing and Urban Development
451 Seventh Street S.W. Room 1826
Washington, DC 20410
202-402-5741 Phone
Lydia.b.taghavi@hud.gov Email

J. Trent Alexander
Center for Economic Studies
U.S. Census Bureau
HQ-2K133
4600 Silver Hill Road
Suitland, MD 20746
301-763-9810 Phone
301-763-4310 Fax
J.Trent.Alexander@census.gov Email

Technical

Lydia B. Taghavi
Social Science Analyst,
Division of Program Monitoring and Research Office of
Policy Development and Research
U.S. Department of Housing and Urban Development
451 Seventh Street S.W. Room 1826
Washington, DC 20410
202-402-5741 Phone
Lydia.b.taghavi@hud.gov Email

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000337

Vickie Kee
Center for Economic Studies
U.S. Census Bureau
HQ-6H117
4600 Silver Hill Road
Suitland, MD 20746
301-763-3071 Phone
301-763-6234 Fax
vickie.lynn.kee@census.gov Email

Sponsor
Amy OHara, Chief
Center for Administrative Records Research and Applications
U.S. Census Bureau
HQ-6H106B
4600 Silver Hill Road
Suitland, MD 20746
301-763-5757 Phone
301-763-4310 Fax
Amy.B.Ohara@census.gov Email

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

Replace Paragraph V in the original agreement with:

V. DURATION OF AGREEMENT, AMMENDMENTS, AND MODIFICATIONS

This agreement will become effective when signed by all parties. The agreement will terminate on September 30, 2020, but may be amended at any time by mutual consent of the parties. The parties will review this agreement at least once every three years to determine whether it should be revised, renewed, or canceled.

Any party may terminate this agreement by providing 30 days' written notice to the other party. If the agreement is terminated, neither party shall be responsible for any costs incurred by the other party prior to the termination.

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000338

Replace Paragraph VIII in the original agreement with:

VIII. APPROVALS

Ron S. Jarmin — Date
Assistant Director for Research and Methodology
U. S. Census Bureau

Katherine M. O'Regan — Date
Assistant Secretary for Policy Development and Research
Department of Housing and Urban Development

Enclosures:
Enclosure A: Census Bureau File Specifications and Requirements for the TRACS files
Enclosure B: Census Bureau File Specifications and Requirements for the PIC files
Enclosure C: Census Bureau File Specifications and Requirements for the CHUMS files
Enclosure D: Census Bureau File Specifications and Requirements for the LIHTC files
Enclosure E: Census Bureau File Specifications and Requirements for the FHA files

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000339

Replace Paragraph VIII in the original agreement with:

VIII. APPROVALS

Ron S. Jarmin
Assistant Director for Research and Methodology
U. S. Census Bureau

4/20/18
Date

Katherine M. O'Regan
Assistant Secretary for Policy Development and Research
Department of Housing and Urban Development

05/13/18
Date

Enclosures:
Enclosure A: Census Bureau File Specifications and Requirements for the TRACS files
Enclosure B: Census Bureau File Specifications and Requirements for the PIC files
Enclosure C: Census Bureau File Specifications and Requirements for the CHUMS files
Enclosure D: Census Bureau File Specifications and Requirements for the LIHTC files
Enclosure E: Census Bureau File Specifications and Requirements for the FHA files

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000340

Enclosure A
CY 2015-2020 Census Bureau File Specifications and Requirements for the Housing and Urban Development (HUD) Tenant Rental Assistance Certification System (TRACS) files

[redacted]	
Geography:	National File
Reference Period:	All records entered or updated between: CY April 1, 2014 and April 1, 2015 CY April 1, 2015 and April 1, 2016 CY April 1, 2016 and April 1, 2017 CY April 1, 2017 and April 1, 2018 CY April 1, 2018 and April 1, 2019 CY April 1, 2019 and April 1, 2020
Delivery Date:	May 30, 2015 May 30, 2016 May 30, 2017 May 30, 2018 May 30, 2019 May 30, 2020
Data Sort:	Sort by most current ZIP Code
Data Variables:	For Head of Household and All Other Members of the Household; all records including move outs and incomplete addresses: LAST_NAME MIDDLE_I FIRST_NAME MEM_SSN HEAD_SSN BIRTH_DATE SEX_CODE RELATIONSHIP RACE ETHNICITY CONTRACT_NUMBER MOVING_DATE PROJECT_NAME PROJECT_NUMBER CERTIFICATION_DATE CERTIFICATION_TYPE TRANSACTION_DATE TRANSACTION_TYPE TERMINATION_REASON ACTIVE_IND CURRENT_IND TOTAL_INCOME SUBSIDY_TYPE TOT_TENANT_PMT

AMERICAN OVERSIGHT

	CONTRACT_RENT GROSS_RENT STD_ADDRESS STD_CITY STD_STCD STD_ZIP FLAG RACE_AMRIND_ALKNTV RACE_ASIAN RACE_BLCK_AFR_AMR RACE_HAWAIIAN_PL RACE_WHITE RACE_OTHER
Special Instructions:	Please verify if Social Security Numbers were validated and describe validation process in accompanying documentation.
Transfer Media:	DVD (encrypted) **(Please e-mail Census Bureau Technical Contact Person with password)**
Format:	ASCII
Documentation:	1. Please include a record layout, record count, block size, BPI, the latest data dictionary, and the name and telephone number of a technical advisor, if we should have questions. 2. Include responses required in special instructions.
Delivery Method:	Traceable Delivery Service (Federal Express, UPS, etc.)
Mark Shipment:	**HUD – TRACS File** **DVD – DO NOT X-RAY** Please e-mail at the time of shipment.
Mailing Address for Shipments:	Ms. Vickie Kee U.S. Census Bureau CES/Research Support Area CES HQ-6H117 4600 Silver Hill Road Suitland, MD 20746 Vickie.lynn.kee@census.gov Ces.dpg.list@census.gov
Census Bureau Technical Contact Person:	Ms. Vickie Kee 301-763-3071 301-763-3072 (staff)

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000342

Enclosure B
CY 2015-2020 Census Bureau File Specifications and Requirements for the Housing and Urban Development (HUD) Public and Indian Housing Information Center (PIC) files

Geography:	**National File**
Reference Period:	All records entered or updated between: CY April 1, 2014 and April 1, 2015 CY April 1, 2015 and April 1, 2016 CY April 1, 2016 and April 1, 2017 CY April 1, 2017 and April 1, 2018 CY April 1, 2018 and April 1, 2019 CY April 1, 2019 and April 1, 2020
Delivery Date:	May 30, 2015 May 30, 2016 May 30, 2017 May 30, 2018 May 30, 2019 May 30, 2020
Data Sort:	Sort by most current ZIP Code
Data Variables:	For Head of Household and All Other Members of the Household; all records including move outs and incomplete addresses. See attached lists of variables: 1. Member File Data Variable List 2. Vacant File Data Variable List 3. Not-Reported File Data Variable List
Special Instructions:	Please verify if Social Security Numbers were validated and describe validation process in accompanying documentation.
Transfer Media:	DVD (encrypted) **(Please e-mail Census Bureau Technical Contact Person with password)**
Format:	ASCII
Documentation:	Please include a record layout, record count, block size, BPI, the latest data dictionary, and the name and telephone number of a technical advisor, if we should have questions.
Delivery Method:	Traceable Delivery Service (Federal Express, UPS, etc.)
Mark Shipment:	**HUD – PIC File** **DVD – DO NOT X-RAY** Please e-mail at the time of shipment.
Mailing Address for Shipments:	Ms. Vickie Kee U.S. Census Bureau

AMERICAN OVERSIGHT

[redacted]	CES/Research Support Area CES HQ-6H117 4600 Silver Hill Road Suitland, MD 20746 Vickie.lynn.kee@census.gov Ces.dpg.list@census.gov
Census Bureau Technical Contact Person:	Ms. Vickie Kee 301-763-3071 301-763-3072 (staff)

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000344

1. Member File Data Variable List
(For HUD/PIC)

MBR_LAST_NAME
MBR_M_INITIAL
MBR_FIRST_NAME
SSN_HEAD
SSN_MBR
BIRTH_DATE
MBR_AGE
MBR_SEX
MBR_ETHNICITY
RELATIONSHIP
WHITE_IND
BLACK_IND
A_INDIAN_ALASKAN_IND
ASIAN_IND
HAWAIIAN_PACIFIC_IND
PROGRAM_TYPE
DEVELOPMENT_CODE
PROJECT_NAME
TYPE_OF_ACTION
PARTICIPANT_CODE
CERTIFICATION_DATE
MOVING_DATE
TOT_A_INCOME
TTP(TOTAL_TENANT_PAYMENT)
GROSS_RENT
CONTRACT_RENT
STD_ADDRESS
STD_CITY
STD_STCD
STD_ZIP9
ZIP_CODE_OLD
FLAG
VOUCHER_TYPE
VOUCHER_SPL_PROGRAM_CODE
BUILDING_NUMBER
BUILDING_NUMBER_ENTRANCE
OLD_DEVELOPMENT_CODE
OLD_BUILDING_NUMBER

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000345

2. Vacant File Data Variable List (For HUD/PIC)

DEVELOPMENT_CODE
BUILDING_NUMBER
BUILDING_NUMBER_ENTRANCE
OLD_DEVELOPMENT_CODE
OLD_BUILDING_NUMBER
STD_ADDRESS
STD_CITY
STD_STCD
STD_ZIP9
ZIP_CODE_OLD
PROGRAM_TYPE
FLAG
PROJECT_NAME
MTW_FALG

3. Not-Reported File Data Variable List

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000346

(For HUD/PIC)

DEVELOPMENT_CODE
BUILDING_NUMBER
BUILDING_NUMBER_ENTRANCE
OLD_DEVELOPMENT_CODE
OLD_BUILDING_NUMBER
STD_ADDRESS
STD_CITY
STD_STCD
STD_ZIP9
ZIP_CODE_OLD
PROGRAM_TYPE
FLAG
PROJECT_NAME
SSN_HEAD
MTW_FALG

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000347

Enclosure C
CY 2015-2020 Census Bureau File Specifications and Requirements for the Housing and Urban Development (HUD) Computerized Homes Underwriting Management System (CHUMS) files

Geography:	**National File**
Reference Period:	All records entered or updated between: CY April 1, 2014 and April 1, 2015 CY April 1, 2015 and April 1, 2016 CY April 1, 2016 and April 1, 2017 CY April 1, 2017 and April 1, 2018 CY April 1, 2018 and April 1, 2019 CY April 1, 2019 and April 1, 2020
Delivery Date:	May 30, 2015 May 30, 2016 May 30, 2017 May 30, 2018 May 30, 2019 May 30, 2020
Data Sort:	Sort by most current ZIP Code
Data Variables:	Provide CHUMS data as follows: 1. Borrower Detail – including date of birth, employment status, gender, marital status, name, social security number, race, borrower type, case number, closing date, construction status, endorsement date, and other variables as will be specified at the time of data sharing. 2. Case Detail variables including those related to property address and loan term and type details. 3. Co-Borrower Detail - variables similar to those provided for borrower detail. 4. Other CHUMS variable as will be identified by both parties at the time of data sharing.
Special Instructions:	Please verify if Social Security Numbers were validated and describe validation process in accompanying documentation.
Transfer Media:	DVD (encrypted) **(Please e-mail Census Bureau Technical Contact Person with password)**
Format:	ASCII
Documentation:	Please include a record layout, record count, block size, BPI,

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000348

	the latest data dictionary, and the name and telephone number of a technical advisor, if we should have questions.
Delivery Method:	Traceable Delivery Service (Federal Express, UPS, etc.)
Mark Shipment:	**HUD – CHUMS File** **DVD – DO NOT X-RAY**
	Please e-mail at the time of shipment.
Mailing Address for Shipments:	Ms. Vickie Kee U.S. Census Bureau CES/Research Support Area CES HQ-6H117 4600 Silver Hill Road Suitland, MD 20746 Vickie.lynn.kee@census.gov Ces.dpg.list@census.gov
Census Bureau Technical Contact Person:	Ms. Vickie Kee 301-763-3071 301-763-3072 (staff)

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000349

Enclosure D
CY 2015-2020 Census Bureau File Specifications and Requirements for the Housing and Urban Development (HUD) Low-Income Housing Tax Credit (LIHTC) files

Geography:	**National File**
Reference Period:	All records for CY 2012 (collected during Aug. 1, 2013-July 31, 2014) CY 2013 (collected during Aug. 1, 2014-July 31, 2015) CY 2014 (collected during Aug. 1, 2015-July 31, 2016) CY 2015 (collected during Aug. 1, 2016-July 31, 2017) CY 2016 (collected during Aug. 1, 2017-July 31, 2018) CY 2017 (collected during Aug. 1, 2018-July 31, 2019)
Delivery Date:	May 30, 2015 May 30, 2016 May 30, 2017 May 30, 2018 May 30, 2019 May 30, 2020
Data Sort:	Sort by most current ZIP Code
Data:	Provide Low-Income Housing Tax Credit (LIHTC) files at the following levels: 1. Property-level data sets 2. Unit-level data sets 3. Person-level data sets (includes only the last 4 digits of SSN)
Special Instructions:	Please verify if Social Security Numbers were validated and describe validation process in accompanying documentation
Transfer Media:	DVD (encrypted) **(Please e-mail Census Bureau Technical Contact Person with password)**
Format:	ASCII
Documentation:	Please include a record layout, record count, block size, BPI, the latest data dictionary, and the name and telephone number of a technical advisor, if we should have questions.
Delivery Method:	Traceable Delivery Service (Federal Express, UPS, etc.)
Mark Shipment:	**HUD – LIHTC File** **DVD – DO NOT X-RAY**

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000350

	Please e-mail at the time of shipment.
Mailing Address for Shipments:	Ms. Vickie Kee U.S. Census Bureau CES/Research Support Area CES HQ-8H117 4600 Silver Hill Road Suitland, MD 20746 Vickie.lynn.kee@census.gov Ces.dpg.list@census.gov
Census Bureau Technical Contact Person:	Ms. Vickie Kee 301-763-3071 301-763-3072 (staff)

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000351

Enclosure E
CY 2015-2020 Census Bureau File Specifications and Requirements for the Housing and Urban Development (HUD) Federal Housing Authority (FHA) files

Geography:	**National File**
Reference Period:	All records entered or updated between: CY April 1, 2014 and April 1, 2015 CY April 1, 2015 and April 1, 2016 CY April 1, 2016 and April 1, 2017 CY April 1, 2017 and April 1, 2018 CY April 1, 2018 and April 1, 2019 CY April 1, 2019 and April 1, 2020
Delivery Date:	May 30, 2015 May 30, 2016 May 30, 2017 May 30, 2018 May 30, 2019 May 30, 2020
Data Sort:	Sort by most current ZIP Code
Data:	Provide Federal Housing Authority (FHA) data as follows: 1. Claim Detail 2. Case Detail 3. Co-Borrower Detail 4. FICO Detail 5. Lender Detail 6. Lender Name 7. Underwriter Detail
Special Instructions:	Please verify if Social Security Numbers were validated and describe validation process in accompanying documentation
Transfer Media:	DVD (encrypted) **(Please e-mail Census Bureau Technical Contact Person with password)**
Format:	ASCII
Documentation:	Please include a record layout, record count, block size, BPI, the latest data dictionary, and the name and telephone number of a technical advisor, if we should have questions.
Delivery Method:	Traceable Delivery Service (Federal Express, UPS, etc.)

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000352

Mark Shipment:	**HUD – FHA File** **DVD – DO NOT X-RAY** Please e-mail at the time of shipment.
Mailing Address for Shipments:	Ms. Vickie Kee U.S. Census Bureau CES/Research Support Area CES HQ 6H117 4600 Silver Hill Road Suitland, MD 20746 Vickie.lynn.kee@census.gov Ces.dpg.list@census.gov
Census Bureau Technical Contact Person:	Ms. Vickie Kee 301-763-3071 301-763-3072 (staff)

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000353

AMERICAN OVERSIGHT

MODIFICATION 1 TO THE

MEMORANDUM OF UNDERSTANDING

THROUGH WHICH THE U.S. CENSUS BUREAU IS ACQUIRING

PRISONERS DATA

FROM THE DEPARTMENT OF JUSTICE, UNITED STATES MARSHALS SERVICE

0071-FY18-NFE-0010.001/M0001

This document constitutes a modification to Agreement No. 0071-FY18-NFE-0010, an agreement between the Department of Justice, US Marshals Service (USMS) and the U.S. Census Bureau (Census Bureau) dated May 31, 2018. The purpose of this amendment to allow for the transfer of additional data to the Census Bureau and to document necessary updates to security language.

The purpose of the amendment is to:

1. Add the following paragraph to the end of the BACKGROUND section:

   The Census Bureau requests additional data requested in Modification 1 in order to incorporate information the USMS collects on citizenship for the Census Bureau's Decennial program.

2. Add the following paragraph to the end of the USMS RESPONSIBILITIES section:

   i. To transfer to the Census Bureau via secure method such as Secure File Transfer Protocol (SFTP) or appropriately encrypted, FIPS 140-2 compliant CD-ROM or DVD-ROM, administrative data on prisoners held. Records will be transferred as soon as possible after signing of the MOU but no later than December 31, 2019. A second transfer with any records pertinent to the MOU will be created with a vintage of April 1, 2020 and sent to the Census Bureau as soon as possible but no later than July 31, 2020. Variables required:
      1. Name
      2. Date of Birth
      3. Sex
      4. Social Security Number
      5. Pre-incarceration Address
      6. Citizenship Status

   ii. To provide adequate documentation and support of transferred files for the

AMERICAN OVERSIGHT

Census Bureau to be able to interpret the data for the uses permitted in this agreement, including a record layout, record count, record length and data dictionary.

iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the educational administrative data. Record linkage identifiers may not contain any personally identifiable information.

iv. To allow the Census Bureau staff and Special Sworn Status (SSS) researchers, sworn individuals with the same requirements to protect data security and confidentiality standards as Census Bureau staff, to use the administrative data for the projects listed in Attachment A, and any additional projects approved in writing by both parties.

3. Add the following name to the Census CONTACTS Section:

Data Acquistion and Curation
Michael Berning
Economics Reimbursable Surveys Division
U.S. Census Bureau
Phone: (301) 763-2028
Fax: (301) 763-4310
Email: michael.a.berning @census.gov

Information Security
Jean Marie McKenzie
Office of Information Security
U.S. Census Bureau
Phone: (301) 763-6886
Email: jean.marie.mckenzie@census.gov

4. Add the following sections after the CONTACTS Section:

IT Security:

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence and to use the data for statistical purposes only in accordance with the provisions of Title 13, United States Code. Upon receipt, all data acquired as a result of this interagency agreement will be provided protection in accordance with its defined categorization of risk severity (i.e. National Institute of Standards and Technology (NIST) Federal Information Processing Standards (FIPS) 199 and Special Publication (SP) 800-60r1) and in compliance with the applicable federal regulations for protection of systems and data.

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000356

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "Recommended Security Controls for Federal Information Systems and Organizations," as well as Special Publication 800-37r1 "Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO as well as the Department of Commerce Office of Inspector General as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "Standards for Security Categorization of Federal Information and Information Systems" and NIST Special Publication 800-60r1 "Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices." Security controls and subsequent assessments are done based on the final categorization.

Cloud providers must be approved for at least moderate level information through the GSA FedRAMP process prior to acquiring any services. Census Bureau identifies, assesses and authorizes use based on the published FedRAMP results and an assessment of any Census Bureau (customer provided) controls implemented to protect the infrastructure and data. Security reporting on cloud providers is reported to the Department of Commerce on a regular basis under FISMA.

The Census Bureau maintains a policy regarding the reporting of and response to losses of protected data in accordance with OMB Memorandum M-17-12. Known or suspected losses of protected data must be reported within one hour of its discovery to the Bureau of the Census Computer Incident Response Team (BOC CIRT) at boc.cirt@census.gov or 301-763-3333 who will report as required to the United States Computer Emergency Readiness Team (US CERT). "

Once the Census Bureau becomes aware of a known breach of USMS data, the Census Bureau will contact the identified USMS contacts to discuss the actions and potential remedies in regards to the incident.

Disclosure:

Title 13, Section 9 of the United States Code (U.S.C.) requires the Census Bureau to keep confidential and the information collected from the public under the authority of Title 13. Section 214 of Title 13, U.S.C., and Sections 3551, 3559 and 3571 of Title 18, U.S.C., provide for the imposition of penalties of up to five years in prison and/or up to $250,000.00 in fines for wrongful disclosure of confidential census information.

AMERICAN OVERSIGHT

Disclosure avoidance is the process for protecting the confidentiality of data, as required under Title 13 U.S.C. A disclosure of data occurs when someone can use published statistical information to identify and individual who has provided confidential information under a pledge of confidentiality. For data tabulations, the Census Bureau uses disclosure avoidance procedures to modify or remove the characteristics that put confidential information at risk for disclosure. Although a published table may appear to show information about a specific individual, the Census Bureau has taken steps to disguise or suppress the original data, while making sure the results are still useful. The techniques used by the Census Bureau to protect confidentiality in tabulations vary, depending on the type of data.

Noise injection is the Census Bureau's preferred disclosure avoidance technique. By policy, noise injection is to be applied to all data products that are reported with geographies smaller than a state. In cases when it is not feasible to fully implement noise injection within the period of the contract, a transition plan for implementing noise injection or other provable privacy methods must be developed in coordination with the Census Bureau. Noise injection may be required for microdata releases, depending on the characteristics of the microdata and the specific variables that are to be released. Data that cannot be publicly released may still be analyzed within the Federal Statistical Research Data Centers (FSRDCs) by individuals who have Special Sworn Status; the results of such analyses must still go through a disclosure avoidance process prior to being publicly released.

The parties understand that Title 13 confidentiality protection and disclosure avoidance techniques apply to all work described in this agreement. The disclosure avoidance disclosure methods are defined by the Census Bureau who has the responsibility of carrying out that work. Accordingly, upon completion of the tabulation, the data produced must be reviewed by the Census Bureau to ensure that no identifiable Title 13 data are or may be disclosed. Should the Census Bureau's Disclosure Review Board (DRB) determine that the requested statistical product does or reasonably could result in such disclosure, then the data product will be modified prior to approval for release to the party(ies) of this agreement. The DRB must approve before a research product can be released to an individual who does not have SSS and a need to know, or moved to a computer not approved for controlled data according to Census' existing policies and procedures.

5. Add Attachment A.

All other terms and conditions contained in the original Census Bureau/USMS Interagency Agreement 0071-FY18-NFE-0010 shall remain the same.

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000358

APPROVALS

9/16/19

Kevin Deardorff (Date)
Chief, Economic Reimbursable Survey Division
U.S. Census Bureau

8/26/19

John P. Sheehan (Date)
Acting Assistant Director
Prisoner Operations Division
United States Marshals Service

8/9/19

Karl Mathias, Ph.D (Date)
Assistant Director
Information Technology Division
United States Marshals Service

AMERICAN OVERSIGHT

Attachment A: Description of Approved Research Projects

1. **Evaluation and Improvement of Citizenship Information in Demographic Surveys and Censuses**

   The Census Bureau is developing the capability to measure the citizen voting age population by race and ethnicity at the block level via linking citizenship information from administrative records to Census microdata files. The Census Bureau hosts SSA Numident and IRS ITIN files containing citizenship information that could potentially be used for this purpose. It is unknown how quickly the SSA Numident is updated when persons are naturalized, however. The Census Bureau would like to investigate the timeliness of the Numident and IRS data by comparing them to other sources covering naturalized U.S. citizens and noncitizen U.S. residents. These other sources can also fill coverage gaps in the SSA (which does not contain citizenship status for those individuals applying for an SSN prior to 1972) and IRS data (which does not contain citizenship status information for noncitizens who do not need to file an IRS tax return). The Census Bureau will conduct research and evaluations of data quality of our own household survey responses to the citizenship question with naturalization and noncitizen resident administrative records. We will also conduct research that informs the Bureau's understanding of the relationship between citizenship and other core demographic and socioeconomic aspects of migration, labor markets, and household wellbeing using the enhanced citizenship categorizations developed under this project.

2. **Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records**

   The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey and decennial data related to citizenship and permanent resident status. The project will also use USCIS data to investigate survey frame coverage, survey effects and survey non-response.

   This project will focus on evaluating and improving the measurement of citizenship, migration, and legal residency status in the 2020 Decennial Census, the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP").

AMERICAN OVERSIGHT

This project will include additional studies that use administrative records from state and federal programs (including USCIS data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

3. **Improve Census Bureau Record Linkage Methods**

The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the naturalization and noncitizen administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS.

4. **Research, Testing and Operations for the 2020 Census**

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

A. validating and enhancing the Master Address File (MAF);[1]
B. designing and assigning resources to carry out the 2020 Census;[2]
C. unduplicating public, private, and census lists; and
D. imputing missing data.[3]

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data, intercensal test data, and other Census household survey data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across

[1] Examples of possible Census Bureau uses include updating and evaluating the Master Address File.
[2] Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.
[3] Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

AMERICAN OVERSIGHT

sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census, intercensal test data, and other Census household survey data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data, operational site test data, and other Census household survey data with the end goal of eventually incorporating the data into decennial census operations.

5. **Annual Business Survey Research**

In an effort to address respondent burden, declining response rates and rising operational costs while improving data quality, timeliness and efficiency, three business surveys have been consolidated into one new survey, the Annual Business Survey or ABS. The consolidated surveys are the five-year Survey of Business Owners (SBO), the Annual Survey of Entrepreneur (ASE) and the Business R&D and Innovation Survey for Microbusinesses (BRDI-M). The ABS is designed to serve as the continuation of the annual collection of information on the characteristics of United States (U.S.) businesses and provide estimates by demographics of the business owner for survey reference years 2017-2021.

While the ABS will survey employer firms, it will not cover non-employers. The continuation of estimates of demographics for non-employer businesses (previously undertaken by the SBO) will now be accomplished through the nonemployer component of the ABS program. This component will consist of leveraging existing individual-level administrative (AR) and census records to assign demographic characteristics to the universe of nonemployers and hence, make possible the production of annual non-employer business statistics by the demographics of the business owner. Demographic characteristics include citizenship at birth, gender, race, Hispanic origin, veteran status, and age. One of the main advantages of this nonemployer work is that it will reduce respondent burden on approximately 24 million nonemployer businesses while, at the same time, creating a replacement annual data product for nonemployers. Without this nonemployer component, the official estimates of the demographics of U.S. nonemployer businesses previously provided by the SBO would cease to exist.

Specifically, the data in question will be used to impute (whenever replacement is not possible) the 'citizenship at birth' of the business owner. This characteristic of the business owner is an increasingly important factor in business outcomes and the U.S. economy overall, as the foreign-born entrepreneurial activity has been increasing and contributing in important ways to innovation while, at the same time, business start-ups have generally been declining in the U.S.

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000362

MEMORANDUM OF UNDERSTANDING

THROUGH WHICH

THE U.S. CENSUS BUREAU IS ACQUIRING

US VETERANS DATA

FROM

U.S. DEPARTMENT OF VETERANS AFFAIRS

Agreement No. 2064-FY18-NFE-0186

1. PARTIES AND PURPOSE

This Memorandum of Understanding (MOU) establishes an agreement between the U.S. Census Bureau (Census Bureau) and the U.S. Department of Veterans Affairs' (VA) for the acquisition of USVETS data. The parties have executed a separate agreement (#0094-FY16-NFE-0078.000) which established a joint statistical research project under which both agencies may conduct research projects that benefit both agencies. Under this agreement, the VA will transfer data to support Census Bureau statistical and data production projects.

2. AUTHORITY

The Census Bureau's authorities to participate in this agreement with VA are (1) 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The Secretary of VA is authorized to enter this memorandum of understanding under 38 U.S.C. § 5722-23. The 5 U.S.C. section 552a(b)(4) also authorizes sharing of data between VA and the Census Bureau.

3. TERMS AND CONDITIONS

Pursuant to this agreement, the VA will transfer records to the Census Bureau from the USVETS data. All data that the VA agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and those Special Sworn Status ("SSS") researchers participating in the projects will have access to the data. Access shall be limited to the minimum number of individuals necessary. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it may not be disclosed in individually-identifiable form that permits the identification of any individual respondents, businesses, organizations, or institutions, and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the

AMERICAN OVERSIGHT

USVETS data to census data, survey data and administrative records data. To the extent provided by law, the Census Bureau will recognize the VA as the owner of the original data in the form that it is delivered to the Census Bureau, prior to its integration with confidential Census data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and censuses.

a. The VA agrees:

   i. To transfer to the Census Bureau on an annual basis via a secure transfer method such as a Secure File Transfer Protocol (SFTP) or appropriately encrypted CD-ROM or DVD-ROM, data from the program agency.

   ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, record length and data dictionary.

   iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the program agency data.

   iv. To allow the Census Bureau staff and SSS researchers to use the USVETS data for the projects listed in Attachment I.

b. The Census Bureau agrees:

   i. To the extent provided by law, to grant access to the USVETS data only to Census Bureau staff and SSS researchers only for the projects approved in writing by both parties.

   ii. To the extent permitted by law, to dispose of the restricted VA data within two (2) years after the data have been transferred to the Census Bureau. The Census Bureau will provide VA with written verification that Census Bureau has destroyed the restricted VA data.

   iii. To provide VA's Office of Data Governance and Analytics (DGA) an opportunity to review and comment on the findings from any report or analysis associated with the projects approved under this agreement, thirty (30) days prior to the report or analysis, in whole or in part, being published. Pre-publication review does not apply to production data tables where production statistics are derived from multiple sources and the contribution of the restricted VA data is unknown, or to production data and statistical tables without analysis.

   iv. To provide copies of all publicly released Census Bureau research reports made possible using data from this agreement to VA's DGA. At the completion of the project, the Census Bureau will deliver a summary of project outputs including

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000364

reports, articles, and conference presentations to VA's DGA.

4. CONTACTS

The contacts of each party to this agreement are:

Michael Berning
Assistant Division Chief
Economic Reimbursable Surveys Division
U.S. Census Bureau
4600 Silver Hill Road, 5K123
Washington, DC 20253
301-763-9810
Michael.A.Berning@census.gov

Melissa Chiu
Director in Charge, Office of Data Governance and Analytics
Office of Enterprise Integration
Department of Veterans Affairs
810 Vermont Ave. NW, Washington DC 20420
202-461-5901
Melissa.Chiu@va.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement will become effective when signed by all parties. The agreement will terminate five (5) years from the date of signature by all parties, but may be amended at any time by mutual consent of the parties. The parties may review this agreement annually to determine whether it should be revised, renewed, or canceled.

Any party may terminate this agreement by providing 30 days' written notice to the other party. If the agreement is terminated, neither party shall be responsible for any costs incurred by the other party prior to the termination.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

AMERICAN OVERSIGHT

7. CONFIDENTIALITY

A. IT Security

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence and to use the data for statistical purposes only in accordance with the provisions of Title 13, United States Code. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with the National Institute of Standards and Technology (NIST), Federal Information Processing Standards (FIPS) 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "Recommended Security Controls for Federal Information Systems and Organizations," as well as Special Publication 800-37r1 "Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO as well as the Department of Commerce Office of Inspector General as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "Standards for Security Categorization of Federal Information and Information Systems" and NIST Special Publication 800-60r1 "Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices." Security controls and subsequent assessments are done based on the final categorization.

Cloud providers must be approved for at least moderate level information through the GSA FedRAMP process prior to acquiring any services. Census Bureau identifies, assesses and authorizes use based on the published FedRAMP results and an assessment of any Census Bureau (customer provided) controls implemented to protect the infrastructure and data. Security reporting on cloud providers is reported to the Department of Commerce on a regular basis under FISMA.

The Census Bureau maintains a policy regarding the reporting of and response to losses of protected data in accordance with OMB Memorandum M-17-12. Known or suspected losses of protected data must be reported within one hour of its discovery to the Bureau of the Census Computer Incident Response Team (BOC CIRT) who will report as required to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau becomes aware of a known breach of data, the Census Bureau will contact the identified contacts to discuss the actions and potential remedies in regards to the incident. Census can only agree to confidentiality/disclosure provisions to the "extent permitted by law."

B. Disclosure Avoidance Review of Statistical Products

Title 13, Section 9 of the United States Code (U.S.C.) requires the Census Bureau to keep confidential the information collected from the public under the authority of Title 13. Section 214 of Title 13, U.S.C., and

AMERICAN OVERSIGHT

Sections 3551, 3559 and 3571 of Title 18, U.S.C., provide for the imposition of penalties of up to five years in prison and/or up to $250,000.00 in fines for wrongful disclosure of confidential census information.

Disclosure avoidance is the process for protecting the confidentiality of data, as required under Title 13 U.S.C. A disclosure of data occurs when someone can use published statistical information to identify an individual who has provided confidential information. For data tabulations, the Census Bureau uses disclosure avoidance procedures to modify or remove the characteristics that put confidential information at risk for disclosure. Although a published table may appear to show information about a specific individual, the Census Bureau has taken steps to disguise or suppress the original data, while making sure the results are still useful. The techniques used by the Census Bureau to protect confidentiality in tabulations vary, depending on the type of data.

Noise infusion is the Census Bureau's preferred disclosure avoidance technique. By policy, noise infusion is applied to all data products that are reported with geographies smaller than a state. Noise infusion may be required for microdata releases, depending on the characteristics of the microdata and the specific variables that are to be released. Data that cannot be publicly released may still be analyzed within the Federal Statistical Research Data Centers (FSRDCs) by individuals who have Special Sworn Status; the results of such analyses must still go through a disclosure avoidance process prior to being publicly released.

The parties understand that Title 13 confidentiality protection and disclosure avoidance techniques apply to all work described in this agreement. The disclosure avoidance methods are defined by the Census Bureau who has the responsibility of carrying out that work. Accordingly, upon completion of the tabulation, the data produced must be reviewed by the Census Bureau to ensure that no identifiable Title 13 data are or may be disclosed. Should the Census Bureau's Disclosure Review Board (DRB) determine that the requested statistical product does or reasonably could result in such disclosure, then the data product will be modified prior to approval for release to the party(ies) of this agreement. The DRB must approve before a research product can be released to an individual who does not have SSS and a need to know, or moved to a computer not approved for controlled data according to Census' existing policies and procedures.

AMERICAN OVERSIGHT

8. **APPROVALS**

FOR: [signature]

7/30/19

Kevin Deardorff
Chief, Economic Reimbursable Surveys Division
U.S. Census Bureau

Date

[signature]

8/01/2019

Melissa Chiu
Director in Charge, Office of Data Governance and Analytics
Office of Enterprise Integration
Department of Veterans Affairs

Date

AMERICAN OVERSIGHT

ATTACHMENT I: Proposed Projects Using Data Disclosed by VA

1. **Nonemployer Statistics by Demographics (NES-D)**

The quinquennial Survey of Business Owners or SBO provided the only comprehensive source of information in the United States on employer and nonemployer businesses by the sex, race, ethnicity and veteran status of the business owners. With the cessation of the SBO, the Nonemployer Statistics by Demographics series (NES-D) represents the continuation of demographics estimates for nonemployer businesses and their owners. The nonemployer universe is comprised of businesses with no paid employment or payroll, with annual receipts of $1,000 or more ($1 or more in the construction industries), and filing tax forms for sole proprietorships, partnerships, or corporations. There were approximately 25 million nonemployer businesses in the United States in 2016.

NES-D will consist of aggregate tabulations of number of establishments, business owners, and receipts of U.S. nonemployer businesses by the demographic characteristics of the business owner as well as by the legal form of organization and receipts-size class of the business at detailed industry and geography levels. NES-D will leverage existing tax, administrative and census records to obtain demographic characteristics for the universe of nonemployer business owners, as well as obtain receipts, legal form of organization, industry and geography of nonemployer firms. Demographic characteristics include key demographics measured by the SBO (sex, race, Hispanic origin and veteran status) as well as other demographics (age, place of birth and citizenship status) collected but not imputed by the SBO if missing.

Without added respondent burden, and at lower imputation rates and costs, NES-D will meet the needs of stakeholders (including Veteran Affairs and the Small Business Administration) and the economy as a whole by providing reliable estimates at a higher frequency (annual vs. every 5 years) and with more timely dissemination schedule than the survey it replaces. Without NES-D, the official estimates of the demographics of U.S. nonemployer businesses previously provided by the SBO would cease to exist.

As the background discussion above shows, VA's USVETS data would be of great value by annually providing veteran status information for nonemployer businesses owners. The data would be used to directly assign (or impute whenever direct assignment is not possible) veteran status to the universe of nonemployers. This would make possible the production of reliable annual estimates of veteran-owned nonemployer businesses, yielding a better understanding of the veteran-owned businesses population and its evolution over time.

2. **Demonstration of Administrative Records Improving Survey (DARIS) (ARTS 707)**

The DARIS Project analyzes direct and indirect uses of administrative data to enhance survey data collection, processing, and analysis. DARIS builds upon over a decade of administrative data research projects benefitting State and Federal Agencies. The goal of the DARIS Project is to improve survey frames, develop model-based edits and allocations, and evaluate data quality over time. Through the DARIS Project, the Census Bureau will evaluate military-related questions in survey data. The USVETS data disclosed by VA will be linked to the Current Population Survey (CPS), American Community Survey (ACS), and Survey of Income and Program Participation (SIPP). The first survey that we will link is the ACS to evaluate questions concerning veteran status, period of service (enlisted and separation date), disability status (any disability and service connected disability), the percent disabled (service connected disability rating). The first item of research is to evaluate the numbers of veterans as reported in the ACS

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000369

questionnaire as opposed to the number in the VA administrative records. After the validity of the veteran's status question is established, the Census Bureau will evaluate other military-related survey questions. This type of evaluation may help inform improvements to model-based edits and allocations in these surveys.

Through this research, other joint project goals can be achieved: Research partners from VA will assist Census in interpreting in-depth demographic and social-economic statistical analysis, as well as personal finance and insurance-related statistics. The wealth of data in the demographic surveys will enable evaluations of a) Economic Characteristics; b) Financial Characteristics; c) Social Characteristics; and d) Health Insurance. Matching USVETS data to the ACS will also support analyses of veterans' migration patterns. The advent of direct deposit and electronic funds transfers has reduced the completeness and accuracy of addresses in VA data systems. Matching the USVETS data to ACS will increase the reliability of general analyses and Geographic Information System (GIS) based analyses of the persons in VA benefits and healthcare-related data.

3. **Longitudinal Employer-Household Dynamics Data Infrastructure Project (LEHD) (ARTS 445)**

The core insight of the LEHD program is that a major way in which the Census Bureau can meet its Title 13 mandate is to combine data from the Economic Directorate with that of the Demographic Directorate by means of linking administrative, census, and survey records for individuals and businesses. Doing so allows LEHD to create a national frame of jobs. This is neither a household nor a business frame but is essential to the creation and maintenance of integrated household and business statistics. That is, the job frame links the person and the business together through the job. Matching the USVETS data to the longitudinal national frame of jobs which links firms and workers longitudinally over time would allow a study of the employment paths of veterans.

4. **Research, Testing and Operations for the 2020 Census**

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau will use VA program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

A. validating and enhancing the Master Address File (MAF);
B. designing and assigning resources to carry out the 2020 Census;
C. unduplicating public, private, and census lists; and
D. imputing missing data.

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000370

aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

AMERICAN OVERSIGHT

Attachment II: VA Core File Record Layout

Data elements needed to support approved projects shall include but not be limited to:

Record Location	NCVAS Variable Name	Field Description	Field Size	Field Type
1-9	SSN	SOCIAL SECURITY NUMBER	9	N
11-36	LNAME	LAST NAME	26	A
38-57	FNAME	FIRST NAME	20	A
59-78	MNAME	MIDDLE NAME/INITIAL	20	A
80-87	DOB	DATE OF BIRTH (YYYYMMDD)	8	N
89	SEX	SEX CODE (M=MAKE, F=FEMALE, U=UNKNOWN	1	A
91-130	ADDRL1	ADDRESS LINE 1	40	A
132-171	ADDRL2	ADDRESS LINE 2	40	A
173-174	STATE	ADDRESS LINE 3 - STATE ABBREVIATION	2	A
176-180	ZIP_CODE	ADDRESS LINE 4 - ZIP CODE	5	N
181-184	ZIP_EXT	ADDRESS LINE 5 - – ZIP CODE EXTENTION	4	N

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000372

FORM **BC-1797(ef)** (7-21-2003)

U.S. DEPARTMENT OF COMMERCE
Economics and Statistics Administration
U.S. CENSUS BUREAU

PAYABLE INTERAGENCY AND OTHER SPECIAL AGREEMENTS (IOSA) TRANSMITTAL

1. Date prepared: 02/04/2020

2. Identification Information

a. Type of agreement: Payable	**b.** Reference number: 2064-20-PAY-03	**c.** Project number: 6750F01
d. Other Organization's name: CMS	**e.** Sponsoring Division name: ERD	
f. Project title: CMS MEDB	**g.** Census Administrative contact: Tynell Johnson	Telephone number: (301) 763-2709

3. Legal Authority

Specify what authority	*Specify other*
Data Access 13 U.S.C. 6	

4. Total obligation		**5.** Period covered	**6.** Payment schedule
a. Fiscal year(s)	**b.** Amount	**a.** From: Upon Signature	*Mark (X) one box.*
2020	$10,500	**b.** To: 9/30/2020	☒ Total Annual
			☐ Other – *Provide details in Comments section or in the IOSA*

7. Principal Contacts

a. Other organization name: Alisha Williams	**c.** Census name: Kevin E. Deardorff
b. Telephone number: (410) 786-7507	**d.** Telephone number: (301) 763-6033

8. Internal Routing

Name (a)	Office/ Room number (b)	Take action below (c)	Initials/ Date (d)
Finance via IOSA SharePoint			

Action Items

1 – Approval/Signature and Date	2 – Clearance/Initials and Date

Comments

Org Code:11-26-2064-00-00-01
Project #: 6750F01
Project: $10,500
Obj Class :25-30-07-00

AMERICAN OVERSIGHT

UNITED STATES GOVERNMENT
GENERAL TERMS & CONDITIONS (GT&C)
FS Form 7600A

BUREAU OF THE Fiscal Service
U.S. DEPARTMENT OF THE TREASURY

Agreement Between Federal Program Agencies for Intragovernmental Reimbursable, Buy/Sell Activity. In Accordance with TFM Volume 1, Part 2, Chapter 4700, Appendix 6, Section 9.

https://www.fiscal.treasury.gov/fsservices/gov/acctg/g_invoice/g_invoice_home.htm

G-Invoicing Required Fields have an (*)

NEW OR MODIFIED GT&C			
*General Terms and Conditions (GT&C) Number		GT&C Number:	
		Modification Number: 0	
AGENCY INFORMATION			
1.		Requesting Agency (Buyer)	Servicing Agency (Seller)
	*Agency Identifier (AID)	013	075
	*Agency Location Code (ALC)	13040001	75050080
	*Agency Name	Department of Commerce U.S. Census Bureau (Census Bureau)	Centers for Medicare & Medicaid Services (CMS)
	*Agency Address	4600 Silver Hill Road Suitland, MD 20746	7500 Security Boulevard, Baltimore, MD 21244
	Cost Center	Economic Reimbursable Surveys Division (ERD)	Office of Enterprise Data & Analytics (OEDA)
	Business Unit		
	Department ID		
GT&C INFORMATION			
2.	GT&C Title	Reimbursement for CMS data	
3.	Agency Agreement Tracking Number	2084-20-PAY-03	IA20-48
4.	*Agreement Period	Start Date (mm/dd/yyyy): Upon final signa	End Date (mm/dd/yyyy): 09/30/2020
5.	Termination Days	30	
6.	*Agreement Type	(•) Single Order ( ) Multiple Order	
7.	*Advance Payment Indicator	Are Advance Payments allowed for this GT&C? ( ) Yes (•) No *If "Yes", the Requesting Agency Advance Payment Authority Title and Citation are required upon creation of an Order against this GT&C.	
8.	*Assisted Acquisition Indicator	Will this GT&C accommodate Assisted Acquisitions? ( ) Yes (•) No *If "Yes", the Servicing Agency provides acquisition support in awarding and managing contracts on behalf of the Requesting Agency's requirements for products or services. Lines 17 & 18 below for additional detail.	
ESTIMATED AGREEMENT AMOUNT			
9.	Total Direct Cost Amount	$10,500.00	
	Total Overhead Fees and Charges Amount	$0.00	
	*Total Estimated Amount	$10,500.00	

AMERICAN OVERSIGHT

	Enforce Total Remaining Amount	Should G-Invoicing enforce the total value of orders to remain below the Total Amount on the GT&C? (•) Yes ( ) No If "Yes", G-Invoicing will not allow Order total to exceed the GT&C total.
ADDITIONAL AGREEMENT INFORMATION		
10.	Explanation of Overhead Fees and Charges	
11.	Requesting Scope	Under this Interagency Agreement (IAA), CMS will provide the Census Bureau with certain Medicare Enrollment Data from the Medicare Enrollment Database (MEDB) for 2018, 2019, and 2020 from the Chronic Condition Warehouse/Virtual Research Data Center (CCW/VRDC). The requesting organization will conform with all of CMS's data release policies and procedures and has executed Data Use Agreement (DUA) RSCH-2008-18931 (Attachment I) to that effect, which is hereby incorporated into, and is part of, this agreement, and which is attached as an addendum hereto. CMS will make the appropriate minimally necessary data available to approved users once all CMS data requirements are met. Census Bureau will use the data with information from census and survey respondents, information from federal and state agencies, and information from third party vendors for statistical purposes only. The Census Bureau intends to use data acquired under this agreement at Census Bureau Headquarters in Suitland, Maryland, and in the Research Data Center (RDC) Network. Only Census Bureau employees and Title 13, U.S.C. Section 23(c) Special Sworn Status researchers working on approved projects will access data acquired under this agreement. Under this IAA, CMS will provide the Census Bureau with the requested data as permitted or required by applicable law. Census Bureau, in turn, agrees to never disclose CMS' data outside Census Bureau except as required by applicable law or as permitted by this agreement and the DUA RSCH-2008-18931 (Attachment I). Furthermore, Census Bureau agrees to limit use of CMS' data to what is permitted under applicable law, this agreement and the attached DUA. In addition, refer to the CCW Cost Invoice (Attachment II), MEDICARE Enrollment Database General File Requirements (Attachment III), MEDB File Layout (Attachment IV), and the Census Bureau System(s) of Records (SORs) Commerce/Census-8 and Commerce/Census-3 (Attachment V).
12.	Requesting Roles	To identify the individuals and the Census Bureau's desired data elements about those individuals, Census Bureau will submit a data request annually to the Research Data Assistance Center (ResDAC). In providing such requests, Census Bureau should allow sufficient time for the review and approval of the data request, and time for processing of the data.
13.	Servicing Roles	CMS will provide the Census Bureau with the requested data from the CCW/ VRDC. In response to Census Bureau's data requests, CMS will provide 2018, 2019, and 2020 MEDB User View Files, 2018, 2019, and 2020 Identifier Crosswalk Beneficiary Identification (BENE ID) to Health Insurance Claim (HIC) files, and 2018, 2019, and 2020 Identifier Crosswalk BENE ID to Social Security Number (SSN) files for the individuals covered by the data request.
14.	Restrictions	Refer to the IAA Addendum.
15.	Assisted Acquisition Small Business Credit Clause	The Servicing Agency will allocate the socio-economic credit to the Requesting Agency for any contract actions it has executed on behalf of the Requesting Agency.
16.	Disputes	Disputes related to this GT&C and any related Orders shall be resolved in accordance with instructions provided in the Treasury Financial Manual (TFM) Volume I, Part 2, Chapter 4700, Appendix 6; Intragovernmental Transaction (IGT) Guide, at http://tfm.fiscal.treasury.gov/content/tfm/v1/p2/c470.html

AMERICAN OVERSIGHT

17.	Requesting Assisted Acquisitions	
18.	Servicing Assisted Acquisitions	
19.	Requesting Clauses	
20.	Servicing Clauses	CMS does not allow pen and ink changes or altering to this agreement after any signatures have been obtained. Changes that occur in any section from the approved version to the final signed version will not be accepted by CMS. If changes are required to this agreement, please contact the CMS Contracting Officer Representative (COR) to have the agreement changes routed for the Office of Acquisition and Grants Management (OAGM) re-approval. In addition, refer to the IAA Addendum.
CLOSE GT&C		
21.	Closing Date (mm/dd/yyyy):	
	Brief explanation required for closing this GT&C prior to the original End Date resulting in early termination:	
PREPARER INFORMATION		
22.	*Prepared Name	G. Patricia de la Cruz
	*Prepared Phone	+1 (301) 763-2377
	*Prepared E-mail	g.patricia.de.la.cruz@census.gov

AMERICAN OVERSIGHT

General Terms and Conditions (GT&C) Number: _____

AGREEMENT APPROVALS			
By signing this agreement, you authorize the General Terms and Conditions as stated, and that the scope of the work can be fulfilled. By signing, you agree to periodically review the terms and conditions of the agreement and make any necessary modifications to the GT&C and any affected Order(s).			
		Requesting Initial Approval (required)	Servicing Initial Approval (required)
23.	*Date (mm/dd/yyyy)	See Section 24 for Census	See Section 24 for CMS
	*Approver's Name		
	*Signature:		
	Title		
	*E-mail		
	*Phone		
	Fax		
		Requesting Final Approval (required)	Servicing Final Approval (required)
24.	*Date (mm/dd/yyyy)	01/30/2020	
	*Approver's Name	Kevin Deardorff	Andy Shatto
	*Signature:	KE Deardorff	Andrew E. Shatto -S Digitally signed by Andrew E. Shatto -S Date: 2020.01.30 15:39:55 -05'00'
	Title	Division Chief, ERD	Deputy Director, Office of Enterprise Data & Analytics
	*E-mail	kevin.e.deardorff@census.gov	Andrew.Shatto@cms.hhs.gov
	*Phone	+1 (301) 763-6033	+1 (410) 786-6384
	Fax		

AMERICAN OVERSIGHT

UNITED STATES GOVERNMENT
ORDER FORM
FS FORM 7600B

BUREAU OF THE Fiscal Service
U.S. DEPARTMENT OF THE TREASURY

Agreement Between Federal Program Agencies for Intragovernmental Reimbursable, Buy/Sell Activity.
In Accordance with TFM Volume 1, Part 2, Chapter 4700, Appendix 6, Section 9.
https://www.fiscal.treasury.gov/g-invoice/

G-Invoicing Required Fields have an (*)

NEW OR MODIFIED ORDER			
1.	*Order Number	Order Number:	
		Modification Number:	
2.	*General Terms & Conditions (GT&C) Number (Associated with this Order):		
3.	*Order Date (YYYY-MM-DD):	01/15/2020	
PARTNER INFORMATION			
4.	*Assisted Acquisition Indicator	( ) Yes (•) No	
5.	*Period of Performance	Start Date: Upon Final Signature	End Date: 2020-09-30
		Requesting Agency (Buyer)	Servicing Agency (Seller)
6.	*Agency Location Code (ALC)	13040001	75050080
7.	*Agency Name	Department of Commerce U.S. Census Bureau (Census Bureau)	Centers for Medicare & Medicaid Services (CMS)
8.	Cost Center	Economic Reimbursable Surveys Division (ERD)	Office of Enterprise Data & Analytics (OEDA)
9.	Business Unit		
10.	Department ID		
11.	Order Tracking Number	2084-20-PAY-03	IA20-48
12.	Agency Business Partner Network (BPN)	929955383	927645622
AUTHORITY INFORMATION			
13.	*Statutory Authority Fund Type Code	Requesting Agency (Buyer) ( ) Franchise Fund ( ) Revolving Fund ( ) Economy Act (•) Other Authority ( ) Working Capital Fund	Servicing Agency (Seller) ( ) Franchise Fund ( ) Revolving Fund ( ) Economy Act (•) Other Authority ( ) Working Capital Fund
14.	Statutory Authority Fund Type Title	Section 1108(b) of the Social Security Act	Section 1108(b) of the Social Security Act
15.	Statutory Authority Fund Type Citation		
16.	Program Authority Title	Refer to the IAA Addendum	Records maintained on individuals
17.	Program Authority Citation	Refer to the IAA Addendum	5 U.S.C 552a(b)(4)
ADVANCE INFORMATION (Required by Serving Agency if there is an advance.)			
18.	Advance Revenue Recognition Methodology	( ) Straight Line ( ) Accrual per Work Completed ( ) Monthly ( ) Other	
19.	Advance Revenue Recognition Description (required if "Other")		
20.	Advance Payment Authority Title		

AMERICAN OVERSIGHT

Order Number: _____

21.	Advance Payment Authority Citation	
22.	Total Advance Amount	
DELIVERY INFORMATION (Requesting Agency completes this section.)		
23.	*FOB Point	○ Source/Origin ◉ Destination ○ Other
24.	Constructive Receipt Days	30 (Calendar Days) *Required if Destination/Other is checked on line 23.
25.	Acceptance Point	○ Source/Origin ◉ Destination ○ Other
26.	Place of Acceptance	
27.	Inspection Point	○ Source/Origin ◉ Destination ○ Other
28.	Place of Inspection	
ORDER BILLING (Servicing Agency completes.)		
29.	*Billing Frequency	Please Select One: OTHER
30.	Billing Frequency Explanation	This is a one time billing. CMS will invoice when the DUA and data request are approved by September 30, 2020.
ORDER BILLING (Requesting Agency completes.)		
31.	Priority Order Indicator	○ Yes ◉ No
32.	Capital Planning and Investment Control (CPIC)	○ Yes ◉ No

LINE ITEMS (Additional Lines/Schedules may be added using the + button after Block 93)		
33.	*Line Number	0001
34.	Order Line Status	ACTIVE
35.	*Item Code	9999
36.	*Item Description	Miscellaneous Item - CMS Data
37.	*Line Costs Unit of Measure (UOM)	DOL
38.	*Unit of Measure (UOM) Description	USD Dollars
39.	Total Line Costs	$10,500.00
40.	Order Line Advance Amount	
41.	Product/Service Identifier	
42.	*Capitalized Asset Indicator	NO
43.	Item UID Required Indicator	
44.	*Type of Service Requirements	SEVERABLE
SCHEDULE SUMMARY (Additional Lines/Schedules may be added using the + button after Block 93)		
45.	*Schedule Number	0001
46.	Advance Pay Indicator	No
47.	*Cancel Status (schedule)	ACTIVE
48.	*Schedule Unit Cost/Price	DOL
49.	*Order Schedule Quantity	1
50.	Order Schedule Amount	$10,500

SCHEDULE FUNDING INFORMATION			
		Requesting Agency (Buyer)	Servicing Agency (Seller)

AMERICAN OVERSIGHT

Order Number: _____

51.	*Agency TAS	SP	ATA	AID	BPOA	EPOA	A	MAIN	SUB	SP	ATA	AID	BPOA	EPOA	A	MAIN	SUB
				013	2020	2022		0450	000			075	2020	2020		0511	000
52.	*Agency Business Event Type Code (BETC)	DISB								COLL							
53.	Agency Business Partner Network (BPN) + 4	5383								5622							
54.	Object Class Code	2530								2538							
55.	Additional Accounting Classification	EIN: 53-0204537 CAN: 5995932 BPN: 929955383 25-30-07-00 Object Class Code 6750F01 Project Code								CAN: 5991341 CMS Internal Object Class Code: 25308 BAP: 2200320000 PAC: 0440 EIN: 52-0883104							
56.	*Description of Products and/or Services, including Bona Fide Need for this order. (Buyer only)	Funding to acquire MEDB data from CMS. Refer to the IAA Addendum and DUA. $10,500 for FY20.															

	SLOA INFORMATION (*To capture Agency Internal Accounting)		
57.	Accounting Classification Reference Number		
58.	Reimbursable Flag	○ Yes ○ No	
		Requesting Agency (Buyer)	Servicing Agency (Seller)
59.	Federal Award Identifier Number (FAIN)		
60.	Unique Record Identifier (URI)		
61.	Activity Address (AAC)		
62.	Budget Line Item		
63.	Budget Fiscal Year		
64.	Security Cooperation (FMS)		
65.	Security Cooperation Implementing Agency Code		
66.	Sub-Allocation		
67.	Agency Accounting Identifier		
68.	Funding Center Identifier		
69.	Cost Center Identifier		
70.	Project Identifier		
71.	Activity Identifier		
72.	Cost Element Code		
73.	Work Order Number		
74.	Functional Area		
75.	Agency Security Cooperation Case Designator		
76.	Parent Award Identifier (PAID)		

AMERICAN OVERSIGHT

Order Number: _____

77.	Procurement Instrument Identifier (PIID)		
SCHEDULE SHIPPING INFORMATION			
78.	Ship To Address Identifier		
79.	Ship To Agency Title		
80.	Address 1		
81.	Address 2		
82.	Address 3		
83.	Ship To City		
84.	Ship To Postal Code		
85.	Ship To State	Maryland	
86.	Ship To Country Code		
87.	Ship To Location Description		
88.	Delivery/Shipping Information for Product Special Shipping Information		
89.	Delivery/Shipping POC Name		
90.	Delivery/Shipping Information for Product POC Title		
91.	Delivery/Shipping Information for Product POC E-mail Address		
92.	Delivery/Shipping Information for Product POC Telephone Number		
93.	Agency Additional Information		

AMERICAN OVERSIGHT

Order Number: _____

AGENCY POINT OF CONTACTS (POC)

		Requesting Agency (Buyer)	Servicing Agency (Seller)
94.	*Agency POC Name	Michael Berning	Cara Petroski
	*Agency POC E-mail	michael.a.berning@census.gov	cara.petroski@cms.hhs.gov
	*Agency POC Phone No.	+1 (301) 763-2028	+1 (410) 786-0305
	Agency POC Fax No.		

AGREEMENT APROVALS

FUNDING OFFICIAL

The Funds Approving Officials, as identified by the Requesting Agency and Servicing Agency, certify that the funds are accurately cited and can be properly accounted for per the purposes set forth in the Order. The Requesting Agency Funding Official signs to obligate funds. The Servicing Agency Funding Official signs to start the work, and to bill, collect, and properly account for funds from the Requesting Agency, in accordance with the agreement.

		Requesting Agency (Buyer)	Servicing Agency (Seller)
95.	*Funding Official Name	Kevin Deardorff	Alisha Williams
	*Signature	K Deardorff 1/30/2020	Alisha Williams -S Digitally signed by Alisha Williams -S Date: 2020.01.17 11:38:03 -05'00'
	Funding Official Title	Division Chief, ERD	Funding Official
	*Funding Official E-mail	kevin.e.deardorff@census.gov	Alisha.Williams@cms.hhs.gov
	*Funding Official Phone No.	+1 (301) 763-6033	+1 (410) 786-7507
	Funding Official Fax No.		
	*Funding Official Date Signed		

PROGRAM OFFICIAL

The Program Officials, as identified by the Requesting Agency and Servicing Agency, must ensure that the scope of work is properly defined and can be fulfilled for this Order. The Program Official may or may not be the Contracting Officer depending on each agency's IAA business process.

		Requesting Agency (Buyer)	Servicing Agency (Seller)
96.	*Program Official Name	Kevin Deardorff	Andy Shatto
	*Signature	K Deardorff 1/30/2020	Andrew E. Shatto -S Digitally signed by Andrew E. Shatto -S Date: 2020.01.30 15:40:52 -05'00'
	Program Official Title	Division Chief, ERD	Deputy Director, OEDA
	*Program Official E-mail	kevin.e.deardorff@census.gov	Andrew.Shatto@cms.hhs.gov
	*Program Official Phone No.	+1 (301) 763-6033	+1 (410) 786-6384
	Program Official Fax No.		
	*Program Official Date Signed		

AGENCY PREPARER INFORMATION

		Requesting Agency (Buyer)
97.	*Name	G. Patricia De la Cruz
	*Phone No.	+1 (301) 763-2377
	*E-mail Address	g.patricia.de.la.cruz@census.gov

AMERICAN OVERSIGHT

ADDENDUM TO THE FS 7600A & 7600B
INTERAGENCY AGREEMENT
between
The Department of Commerce
United States Census Bureau
And
The U.S. Department of Health and Human Services
The Centers for Medicare & Medicaid Services (CMS)

Census Bureau IAA Number: 2064-20-PAY-03
CMS IAA Number: IA20-48

I. PURPOSE

The purpose of this Interagency Agreement (IAA) is to delineate the terms and conditions by which the Centers for Medicare & Medicaid Services (CMS) agrees to provide certain Medicare Enrollment Data from the Medicare Enrollment Database (MEDB) for 2018, 2019, and 2020 to the Department of Commerce, U.S. Census Bureau (Census Bureau) in support of Census Bureau research.

II. INTEGRATION

The signed 7600A, 7600B, this Addendum, Data Use Agreement (DUA) RSCH-2008-18931 (Attachment I), the CCW Cost Invoice (Attachment II), MEDICARE Enrollment Database General File Requirements (Attachment III), MEDB File Layout (Attachment IV), and the Census Bureau System(s) of Records (SORs) Commerce/Census-8 and Commerce/Census-3 (Attachment V) constitute the entire agreement of Census Bureau and CMS with respect to its subject matter. There have been no representations, warranties, or promises made outside of this agreement. This agreement does not imply approval of any data requests and the requesting agency must still submit a data request package, which will include the appropriate DUA, to CMS for approval. This agreement will take precedence over any other documents that may be in conflict with it.

III. AUTHORITY

Census Programmatic Authority:
This agreement is made under the authority of 13, U.S.C., Section 6; Title 13, U.S.C., Section 141, 181, 182; The Privacy Act of 1974; Title 5, U.S.C., Section 552a(b)(4), which permits disclosure of records for purposes of planning or carrying out a census, survey or related activity pursuant to Title 13.

AMERICAN OVERSIGHT

IV. BACKGROUND

The Census Bureau is exploring the use of administrative records in surveys and censuses to reduce costs, reduce respondent burden, and improve data quality. Administrative records also enable the development and production of new data products that rely on data integration and modeling. The MEDB data are valuable to multiple program areas within the Census Bureau. Examples of uses in the program areas are listed below.

In the Demographic Directorate, staff use the data to produce intercensal population estimates and domestic migration statistics, and to assess the quality of health insurance coverage information collected in household surveys. MEDB provide additional information to enhance survey frames for health insurance coverage studies. In the Decennial Directorate, staff are exploring how MEDB data along with other federal, state, and private data sources to plan a complete and efficient 2020 Census. MEDB data have been used in multiple census field tests, particularly those testing advances in adaptive design survey methods. Staff in the Research and Methodology Directorate analyze the quality, coverage, and consistency of MEDB data, and also link the data to other survey and administrative records sources to explore the characteristics of enrollees and their participation in other government and state programs.

In all of these research and production uses, only aggregate statistical information released that meets Census Bureau Disclosure Avoidance Review standards.

V. DELIVERABLES

The CMS data delivery should follow the requested data pull dates and delivery schedule as well as include a record layout, SAS Procedure (PROC) Contents file, record count, and data dictionary, as listed in the General File Requirements. Also, please see the MEDB File Layout (Attachment IV).

VI. DURATION OF AGREEMENT

This agreement is effective on the date it is signed by the responsible parties and end on September 30, 2020.

VII. CONTACTS

CMS IAA Coordinator's:
Tyra C. Jeffries
CMS IAA Coordinator

CMS Office of Financial Management:
When CMS is the Requesting Agency:
Kevin Robey

AMERICAN OVERSIGHT

Phone: (410) 786-5156
tyra.jeffries@cms.hhs.gov

Accountant
410-786-9045
Kevin.Robey@cms.hhs.gov

Camille M. Henley
CMS IAA Coordinator
Phone: (410) 786-1492
Camille.Henley@cms.hhs.gov

When CMS is the Servicing Agency:
CMS RIA Collections
DAOReimbursableIA@cms.hhs.gov

Census Financial Contact:
Michael Berning
Assistant Division Chief, ERD
(301) 763-2028
Michael.a.berning@census.gov

VIII. **FUNDS**

Funds for this agreement will not exceed $10,500 for fiscal year (FY) 2020. The Census Bureau shall reimburse CMS for all services provided under the terms of this agreement.

CMS cannot begin work or bill Census Bureau through the Intra-governmental Payment and Collection (IPAC) system until receipt of the IAA signed by all parties.

The Census Bureau will be billed in full via IPAC when the DUA and data request are approved by September 30, 2020 for actual costs incurred.

Prior to the IPAC submission, CMS shall submit payment documentation in the form of an invoice which supports actual expenditures to justify the IPAC billing that will be submitted to the Census Bureau. Send this documentation to the Census Bureau's Contracting Officer Representative (COR) identified below:

Joey Morales (COR)
U.S. Census Bureau
301 763-6947
Joey.morales@census.gov

Please include the following CMS control number on the IPAC submission IA20-48.

IX. **DUPLICATION**

Full implementation of this agreement will not duplicate any existing agreements. The CMS, Office of Enterprise Data & Analytics confirms that there is no duplication or

AMERICAN OVERSIGHT

conflict with any existing agreements.

X. MODIFICATION AND TERMINATION

Any modification or amendment of this agreement must be agreed to by both parties in writing. This agreement may be modified to incorporate new sections or language as required to insure compliance with the respective agency's legislative mandates and internal policies and processes. If the Census Bureau cancels the order, CMS is authorized to collect costs incurred prior to cancellation of the order plus any termination cost.

XI. PRIVACY ACT

This agreement is associated with personally identifiable information (PII) subject to the Privacy Act of 1974.

The CMS system(s) of records from which PII will be released is: the Chronic Condition Warehouse, System No. 09-70-0573 and the Enrollment Data Base, System of record notice. 09-70-0502.

There is an underlying agreement with terms and conditions for disclosing PII, DUA 18931.

XII. INFORMATION SECURITY

This agreement is associated with CMS information and access to the following information systems(s) subject to the Federal Information Security Modernization Act of 2014 (FISMA): Chronic Condition Data Warehouse.

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence and to use the data for statistical purposes only in accordance with the provisions of Title 13, United States Code. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with the National Institute of Standards and Technology (NIST) Federal Information Processing Standards (FIPS) 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "Recommended Security Controls for Federal Information Systems and Organizations," as well as Special Publication 800-37r1 "Guide for Applying the Risk Management Framework to Federal

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000386

Information Systems: A Security Life Cycle Approach." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the Chief Information Officer (CIO) as well as the Department of Commerce Office of Inspector General as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "Standards for Security Categorization of Federal Information and Information Systems" and NIST Special Publication 800-60r1 "Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices." Security controls and subsequent assessments are done based on the final categorization.

Cloud providers must be approved for at least moderate level information through the General Services Administration (GSA) Federal Risk and Authorization Management Program (FedRAMP) process prior to acquiring any services. Census Bureau identifies, assesses and authorizes use based on the published FedRAMP results and an assessment of any Census Bureau (customer provided) controls implemented to protect the infrastructure and data. Security reporting on cloud providers is reported to the Department of Commerce on a regular basis under Federal Information Security Management Act of 2002 (FISMA).

The Census Bureau maintains a policy regarding the reporting of and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are reported within one hour to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau becomes aware of a known breach of CMS data, the Census Bureau will contact the identified CMS contacts to discuss the actions and potential remedies in regards to the incident.

Census Disclosure Avoidance Review of Statistical Products

Title 13, Section 9 of the United States Code (U.S.C.) requires the Census Bureau to keep confidential the information collected from the public under the authority of Title 13. Section 214 of Title 13, U.S.C., and Sections 3551, 3559 and 3571 of Title 18, U.S.C., provide for the imposition of penalties of up to five years in prison and/or up to $250,000.00 in fines for wrongful disclosure of confidential census information. Disclosure avoidance is the process for protecting the confidentiality of data, as required under Title 13 U.S.C. A disclosure of data occurs when someone can use published statistical information to identify an individual who has provided confidential information. For data tabulations, the Census Bureau uses disclosure avoidance procedures to modify or remove the characteristics that put confidential information at risk for disclosure. Although a published table may appear to show information about a specific individual, the Census Bureau has taken steps to disguise or suppress the

AMERICAN OVERSIGHT

original data, while making sure the results are still useful. The techniques used by the Census Bureau to protect confidentiality in tabulations vary, depending on the type of data.

Noise injection is the Census Bureau's preferred disclosure avoidance technique. By policy, noise injection is to be applied to all data products that are reported with geographies smaller than a state. In cases when it is not feasible to fully implement noise injection within the period of the contract, a transition plan for implementing noise injection or other provable privacy methods must be developed in coordination with the Census Bureau. Noise injection may be required for microdata releases, depending on the characteristics of the microdata and the specific variables that are to be released. Data that cannot be publicly released may still be analyzed within the Federal Statistical Research Data Centers (FSRDCs) by individuals who have Special Sworn Status; the results of such analyses must still go through a disclosure avoidance process prior to being publicly released.

The parties understand that Title 13 confidentiality protection and disclosure avoidance techniques apply to all work described in this agreement. The disclosure avoidance methods are defined by the Census Bureau who has the responsibility of carrying out that work. Accordingly, upon completion of the tabulation, the data produced must be reviewed by the Census Bureau to ensure that no identifiable Title 13 data are or may be disclosed. Should the Census Bureau's Disclosure Review Board (DRB) determine that the requested statistical product does or reasonably could result in such disclosure, then the data product will be modified prior to approval for release to the party(ies) of this agreement. The DRB must approve before a research product can be released to an individual who does not have Special Sworn Status (SSS) and a need to know, or moved to a computer not approved for controlled data according to Census' existing policies and procedures. All data releases will conform to both Census and CMS disclosure requirements as described here and in the DUA.

XIII. SECTION 508

Section 508 of the Rehabilitation Act of 1973 as amended is a federal law that requires Federal agencies (29 U.S.C § 794 (d)) to make Information and Communications Technologies (ICT) accessible to employees and members of the public who have disabilities in a manner comparable to ICT made available to CMS employees and members of the public without disabilities. Complying with these amendments will ensure individuals who have disabilities have the same level of access experienced by employees and members of the public without disabilities. This includes creating documents that are accessible to people using assistive technologies, such as screen readers, magnifiers, and other devices such as hearing aids or Text Telephone (TTY).

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000388

Final Rule
On January 18, 2017, the Access Board published a final rule in the Federal Register (82 FR 5790) (hereafter, "ICT Final Rule"), which revised and updated the standards for Section 508. The revised standards applies to the ICT developed, procured, maintained, or used by Federal agencies (hereafter, "508 Standards"), as well as the guidelines for telecommunications equipment and customer premises equipment covered by Section 255 ("255 Guidelines") and the 21st Century Communications and Video Accessibility Act of 2010 (CVAA) ("CVAA Guidelines").

All electronic materials provided under this agreement must meet all applicable Section 508 requirements to the best extent possible. CMS reserves the right to request proof of accessibility for electronic content provided under this IAA and may conduct Section 508 evaluation to assure compliance and usability standards are met.
>>

This concludes the 7600 A & B Addendum

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000389

DUA: RSCH-2008-18931

MAIN INFORMATION

DUA Number: RSCH-2008-18931
DUA Customer Type: Researcher
DUA Category : 55 - NON DHHS AGENCIES - CENSUS, DOD, EPA, SSA, VA ...
DUA Status: Submitted-Waiting for Payment Confirmation
Request entered by: Cheryl Sample
Requested Date: 8/27/2019
Expiration Date: 9/1/2020
Requester: Michael Berning
Requester Organization Name: United States Census Bureau
Requester Email Address: michael.a.berning@census.gov
Requester Phone Number: (301) 763-2028

Project Name: STATISTICAL ADMINISTRATIVE RECORDS SYSTEM
Privacy Act Authorization Code: FEDERAL AGENCY RU
HIPAA Authorization Code: Research

ResDAC Information

ResDAC TicketID : EOP-213-47956

ResDAC Executive Advisor(EA)

Name: Jen Reese
Email: ResDAC@umn.edu
Phone Number: (888) 973-7322
Phone Number Ext :

ResDAC Technical Adviser(TA)

Name: Sammy Sayako
Email: ResDAC@umn.edu
Phone Number: (888) 973-7322
Phone Number Ext :

Principal Investigator

Primary Principal Investigator

Name: Michael Berning
Email: michael.a.berning@census.gov
Phone Number: 3017632028
Phone Number Ext :

CMS Contact (COR)

AMERICAN OVERSIGHT

COR PROXY

First Name	Last Name	Organization Name	Email Address	Phone Number

Collaborating Organization

1. United States Census Bureau
2. United States Census Bureau
3. UNIVERSITY OF NEBRASKA
4. UNIVERSITY OF CHICAGO
5. YALE UNIVERSITY
6. RAND CORPORATION

FUNDING

Funding Source: Federal (DHHS/non-DHHS)
Funding Type: Grant
Funding Organization Name: U.S. Census Bureau
Grant Number: *This is not a grant* IA 08-141/IAA 13-276/IAA 15-201/IAA#16-187/IA 18-89
Grant End Date : 11/23/2016

Contact Details

Contact Type	First Name	Last Name	Email	Phone	Phone Ext
Federal Project Officer	Michael	Berning	michael.a.berning@census.gov	(301) 763-2028	

DOCUMENTS

ID	Document	Date and Time
1	05a_AMEND_FED_CAHPS_No_Fee_Cost_Inv_JZX-856-31351.docx	May 18, 2017 05:12:29 PM
2	05_FEDERAL_AMEND_Spec_Wrksht_Cost-Inv_JIM-986-69318.xlsx	Sep 12, 2017 09:18:52 AM
3	04a_FEDERAL_AMEND_No_Fee_Cost_Inv_IZP-532-67235.docx	Nov 15, 2017 01:17:27 PM
4	05a_FED_AMEND_No_Fee_Cost_Inv_MMA-887-54262.docx	Feb 15, 2018 10:14:29 AM
5	05_Fed_Amend_Spec_Wrksht_Cost_Inv_EOP-213-47956.xlsx	Feb 15, 2018 11:59:02 AM
6	02_AMEND_FED_CAHPS_Exec_Summ_JZX-856-31351.docx	May 18, 2017 05:13:00 PM
7	01_AMEND_FED_CAHPS_Reqst_Ltr_JZX-856-31351.pdf	May 18, 2017 05:13:18 PM
8	01_FEDERAL_AMEND_Reqst_Ltr_JIM-986-69318.pdf	Sep 12, 2017 09:19:08 AM
9	01_FEDERAL_AMEND_Reqst_Ltr_IZP-532-67235.pdf	Nov 15, 2017 01:17:04 PM
10	01_FED_AMEND_Reqst_Ltr_MMA-887-54262.pdf	Feb 15, 2018 10:13:43 AM
11	01_Fed_Amend_Req_Letter_EOP-213-47956.pdf	Feb 15, 2018 11:59:25 AM
12	04_AMEND_FED_CAHPS_Sig_Addend_OHara_Moulton_JZX-856-31351.pdf	May 18, 2017 05:15:02 PM
13	04_FEDERAL_AMEND_Sig_Addend_Uwimana_JIM-986-69318.pdf	Sep 12, 2017 09:19:49 AM
14	cms-r-0235a_DUA_addendum_18931_Mike_signed.pdf	Aug 01, 2017 08:08:49 AM
15	04_FEDERAL_AMEND_Sig_Addend_Berning_JIM-986-69318.pdf	Sep 12, 2017 09:19:48 AM

AMERICAN OVERSIGHT

ID	Document	Date and Time
16	03_FEDERAL_AMEND_Sig_Addend_Haas_IZP-532-67235.pdf	Nov 15, 2017 01:17:44 PM
17	04_FED_AMEND_Sig_Addend_Humphries_MMA-887-54262.pdf	Feb 15, 2018 10:14:08 AM
18	04_FED_AMEND_Sig_Addend_Mader_MMA-887-54262.pdf	Feb 15, 2018 10:14:08 AM
19	04_FED_AMEND_Sig_Addend_vanDijk_MMA-887-54262.pdf	Feb 15, 2018 10:14:09 AM
20	04_FED_AMEND_Sig_Addend_Tannenbaum_MMA-887-54262.pdf	Feb 15, 2018 10:14:09 AM
21	02_FEDERAL_AMEND_Collabrtr_Chklst_IZP-532-67235.docx	Nov 15, 2017 01:17:16 PM
22	02c_FED_AMEND_Collab_Chklst_MMA-887-54262.docx	Feb 15, 2018 10:13:25 AM
23	05_AMEND_FED_CAHPS_Spec_Wrksht_JZX-856-31351.xlsx	May 18, 2017 05:13:43 PM
24	05_FEDERAL_AMEND_Spec_Wrksht_Cost-Inv_JIM-986-69318.xlsx	Sep 12, 2017 09:19:27 AM
25	05_Fed_Amend_Spec_Wrksht_Cost_Inv_EOP-213-47956.xlsx	Feb 15, 2018 11:59:45 AM
26	01a_AMEND_FED_CAHPS_Apprvl_MCAHPS_JZX-856-31351.pdf	May 18, 2017 05:14:46 PM
27	00_FEDERAL_AMEND_Reqst_Summ_JIM-986-69318.docx	Sep 12, 2017 09:21:05 AM
28	03_FEDERAL_AMEND_DUA_Update_JIM-986-69318.pdf	Sep 12, 2017 09:20:31 AM
29	03_Fed_Amend_DUA_EOP-213-47956.pdf	Feb 15, 2018 12:00:26 PM
30	00_Fed_EA-TA_Amendment_Summary_EOP-213-47956.docx	Feb 15, 2018 12:00:53 PM

CUSTODIANS/ DESY USERS

ID	User Name	EUA User Id	Organization	Email Address	Phone Number	Address
1	John Eric Humphries		YALE UNIVERSITY	john.humphries@yale.edu	(773) 633-8483	37 Hillhouse Ave, New Haven, Connecticut, 06511, USA
2	Winnie Lillian Van Dijk		UNIVERSITY OF CHICAGO	wlvandijk@uchicago.edu	(773) 680-0581	5200 S. Drexel Ave, Apt 2E, Chicago, Illinois, 60615, USA
3	John Moulton		United States Census Bureau	john.richard.moulton@census.gov	(301) 703-8646	4600 SILVER HILL ROAD, WASHINGTON, District of Columbia, 20746, USA
4	Nick Mader		UNIVERSITY OF CHICAGO	nmader@chapinhall.org	(773) 256-5195	Chapin Hall at University of Chicago, 1212 E. 60th Street, Chicago, Illinois, 60637, USA
5	Daniel Tannenbaum		UNIVERSITY OF NEBRASKA	dtannenbaum@unl.edu	(818) 568-8086	1301 Lincoln Mall, Unit 801, Lincoln, Nebraska, 68508, USA
6	Ann Haas		RAND CORPORATION	ann_haas@rand.org	(412) 683-2300 Ext: 4517	4570 FIFTH AVENUE, SUITE 600, PITTSBURGH, Pennsylvania, 15213, USA
7	Epaphrodite Uwimana		United States Census Bureau	epaphrodite.uwimana@census.gov	(301) 763-6064 Ext: 4517	4600 SILVER HILL ROAD, SUITLAND, Maryland, 20746, USA

AMERICAN OVERSIGHT

DATA FILE DESCRIPTION

ID	Data File Description	From Year	To Year	Quarter(s)	Extraction %	Re-Used From DUA	Access Type	Status	Disposition Reason
1	EDB - ENROLLMENT DATA BASE	2008	2013		Migrated from DADSS - NA.		SHIPPING	Open	
2	EDBUSR - ENROLLMENT DATABASE USERVIEW	2013 2017 2018	2016 2017 2018		Migrated from DADSS - NA. 100% 100%		SHIPPING	Open	
3	MSIS - MEDICAID STATISTICAL INFORMATION SYSTEM	2013	2013		Migrated from DADSS - NA.		SHIPPING	Open	
4	XWALK4 - CCW BENE ID TO HIC CROSSWALK FILE	2009 2017 2018	2016 2017 2018		Migrated from DADSS - NA. 100% 100%		SHIPPING	Open	
5	XWALK7 - CCW BENE ID TO SSN CROSSWALK FILE	2009 2017 2018	2016 2017 2018		Migrated from DADSS - NA. 100% 100%		SHIPPING	Open	
6	FFSCAH - FEE-FOR-SERVICE (FFS) CONSUMER ASSESSMENT OF HEALTHCARE PROVIDERS AND SYSTEMS (CAHPS) SURVEY DATA	2014	2014		100%		SHIPPING	Open	
7	MCAHPS - MEDICARE ADVANTAGE AND PRESCRIPTION DRUG PLAN CAHPS	2014	2014		100%		SHIPPING	Open	

PENDING DATA FILE DESCRIPTION

ID	Data File Description	From Year	To Year	Quarter(s)	Extraction %	Re-Used From DUA	Access Type	Status	Disposition Reason

REQUESTER PROXY

First Name	Last Name	Organization Name	Email Address	Phone Number

DADSS Comments

Comment	Comment Date	User
Updated DUA to include 2010 EDB data per IA 10-135	Tue Apr 20 08:12:16	ROBIN DALTON

AMERICAN OVERSIGHT

Comment	Comment Date	User
	EDT 2010	
Cert. of Destruction rec'd for initial 2009 EDB user view file that was sent to Census, but unreadable, form file in subject matter file in files room	Tue Apr 20 10:23:13 EDT 2010	SHARON KAVANAGH
Added Theresa F. Leslie as a custodian per a letter from Howard Hogan.	Fri May 28 11:23:31 EDT 2010	JACQUIE CODE
Changed requestor to Roderick Little and removed Cotty Smith as a custodian.	Tue Jun 28 14:37:10 EDT 2011	DAMIEN MARSTON
Added Vickie Kee as a custodian and a reciptient.	Thu Jul 28 14:46:01 EDT 2011	DAMIEN MARSTON
The DUA EXPIRATION DATE has been modified per the DataUseAgreement team, per new directive given by CMS Deputy Chief Information Officer (CIO) June 23, 2011.	Fri Sep 23 16:37:53 EDT 2011	SHARON KAVANAGH
added Bene ID to HIC crosswalk and Bene ID to SSN crosswalk for the years 2009-2011	Mon Jun 11 08:10:36 EDT 2012	ROBIN DALTON
Added the 2012 EDB file.	Tue Jun 26 09:32:48 EDT 2012	DAMIEN MARSTON
PER DADSS GTL, BATCH JOB CHANGED THE CMS CONTACT FROM ROBIN DALTON TO SHARON KAVANAGH	Fri Jan 25 02:27:16 EST 2013	SHARON KAVANAGH
Extended DUA per email request from vickie.lynn.kee@census.gov on 04/16/2013.	Wed Apr 17 09:41:40 EDT 2013	
updated DUA to include 2013 year of EDB User view data per Andy Shatto, CMS, approved 9/6/2013. CCW/Buccaneer to process the EDB and build the RAND race file for OMH/Census under IAA 13-276. CCW DATA DETAILS per record specification worksheet: All records on the file excluding records with date of death on or before March 31, 2012. Run report on July 15, 2013. Output the same variables as with previous requests under this DUA. As of 2013 - add Bene ID to the record layout. Provide record layout, PROC content, record count, and data dictionary with files. ALSO Changed DUA requestor from Roderick Little to Thomas Louis, new Census signatory official. Added Hampton Wilson (Project Contact); Trent Alexander (new data custodian); and Michael Berning (Principal Investigator), all from Census Bureau. CMS/OMH is collaborating with Census on this initiative, OMH Contact is Carla Hodge.	Fri Sep 06 14:20:07 EDT 2013	
Extended per email received between Mar 07 - Mar 12, 2014 from vickie.lynn.kee@census.gov	Fri Mar 14 02:00:14 EDT 2014	SHARON KAVANAGH
DUA Amendment to add additional years of data (2014) EDB user view, Bene ID to HIC crosswalk and Bene ID to SSN crosswalk. Detailed overview of extract methodology, data, and years requested. All records on the file excluding records with date of death on or before March 31, 2013. Run report on June 15, 2014. Output the same variables as with previous requests under this DUA. Add Bene ID to the record layout. Provide record layout, PROC contents, record count, and data dictionary with files. Added data description code for EDB user view, file was previously approved.	Wed May 21 09:41:16 EDT 2014	
Added 2013 MSIS - Medicaid Statistical Information System relative to the new Census Bureau IA 14-229. Note: This data description was added from the update received from Thomas Louis dated 4/15/14 and approval from Joseph Brewer dated 4/28/14 (which reflected 2014 EDB User View,	Wed Jul 30 14:11:44 EDT 2014	Karen Foster

AMERICAN OVERSIGHT

Comment	Comment Date	User
2014 Crosswalk Bene ID to HIC, and 2014 Crosswalk Bene ID to SSN) processed by V. Rogers on 5/21/14.		
Extended per email received between Jan 16 - Jan 23, 2015 from J Trent Alexander (CENSUS/CES FED)	Tue Jan 27 02:01:02 EST 2015	SHARON KAVANAGH
updated DUA to include additional year of already approved dataset per Kim Elmo email 10/06/2015. 2015 year of EDB User view data, and crosswalks: BENE ID to HIC and BENE ID to SSN. CCW to process the EDB and build the RAND race file for OMH/Census under IAA 15-201. CCW DATA DETAILS per record specification: All records on the file excluding records with date of death on or before March 31, 2014. Run report on June 15, 2015. Output the same variables as with previous requests under this DUA. Add Bene ID to the record layout. Provide record layout, PROC contents, record count, and data dictionary with files. Please see additional sheet for data specifications (electronic file).	Wed Oct 07 15:20:28 EDT 2015	
CUSTODIANS Joey Morales and Ron Jarmin added per Joey Morales (CENSUS/CARRA FED) 10/8/2015	Thu Oct 08 14:35:25 EDT 2015	
CUSTODIAN Ron Jarmin changed from CUSTODIAN to REQUESTOR. REQUESTOR Thjomas Louis removed per Joey Morales (CENSUS/CARRA FED) 10/8/2015	Thu Oct 08 14:48:42 EDT 2015	
CUSTODIANS Roderick Little and Hampton Wilson removed per Joey Morales (CENSUS/CARRA FED) 10/8/15	Fri Oct 09 10:56:40 EDT 2015	PATTY MANGER
Extended DUA per email; J Trent Alexander (CENSUS/CES FED) ; 11/24/2015.	Tue Nov 24 09:12:25 EST 2015	
updated DUA to include additional year (semi-annual data pull per record spec worksheet) of already approved datasets: 2016 EDB User view data, and crosswalks: BENE ID to HIC and BENE ID to SSN. Data pull paid via IAA #16-187 per Kimberly Elmo. See record specification worksheet associated with CMS Request Tracking 20160518-426C.	Tue May 24 16:52:34 EDT 2016	

AMERICAN OVERSIGHT

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
7500 Security Boulevard
Baltimore, Maryland 21244-1850

Invoice Information - October 17, 2019

Current Version: V10.0 - 1/2017

Michael Bindley, U.S. Census Bureau

Statistical Administrative Records System

Data File(s) Requested	Years/Quarters	Fee Per Year	# Years	Total
Additional Files:				
EDB User View	2018-2020	$ 3,500	3	$ 10,500
Crosswalks:				
BENE_ID to SSN Crosswalk	2020	$ -		$ -
BENE_ID to HIC Crosswalk	2020	$ -		$ -
			TOTAL	$ 10,500

This fee estimate/invoice is based on our understanding of the proposed data request. Any changes in this request, or clarification resulting in changes, may result in a change in the fee estimate. Additionally, this fee estimate/invoice reflects the current fees of the CCW data files, which may be subject to change.

Receipt of this fee estimate does not imply that the data request has been approved. The requestor will receive notification upon approval by the Centers for Medicare & Medicaid Services (CMS). If approval is provided, the requestor will be instructed to submit payment via www.pay.gov. CMS requires all requestors to submit payments via www.pay.gov. Once you are notified of approval of your request by CMS, you can access the CMS Data Payment Form by visiting:

https://www.pay.gov/paygov/forms/formInstance.html?agencyFormId=25851882

Payment Instructions:

Using the total amount from this fee estimate, follow the directions provided on the Pay.gov site to complete your transaction. At the end of your payment transaction, you will receive an Agency Tracking ID number. You will then need to email the following information to FilesforOrder@cms.hhs.gov:

1) Pay.gov Agency Tracking ID number,
2) DUA number, and
3) CMS Tracking number.

You MUST send this email in order to notify CMS that payment has been submitted.

Payments by check must be made out to Centers for Medicare & Medicaid Services. Once payment is sent to CMS Accounting, you will need to forward an email to CMS FilesforOrder@cms.hhs.gov.

This email MUST include the following information:

1) CMS Tracking Number,
2) DUA Number, and
3) Check number, check date, amount, and issuing institution.

Regular Mail	Overnight Mail
Centers for Medicare and Medicaid Services Attn: Division of Accounting Operations P.O. Box 7520 Baltimore, MD 21244	Centers for Medicare and Medicaid Services Attn: Division of Accounting Operations Mailstop C3-11-03 7500 Security Blvd Baltimore, MD 21244

AMERICAN OVERSIGHT

MEDICARE Enrollment Database General File Requirements
2018, 2019, and 2020 MEDICARE Enrollment Database General File Requirements

2018 Universe:	National File MEDB 2018 data All records on the file **excluding** records with date of death on or before **March 31, 2017**
2019 Universe:	National File MEDB 2019 data All records on the file **excluding** records with date of death on or before **March 31, 2018.**
2020 Universe:	National File MEDB 2020 data All records on the file **excluding** records with date of death on or before **March 31, 2019.**
Extracts/pull dates:	**NOTE:** We are requesting data for 2018, 2019, and 2020 MEDB data. **The MEDB 2018 extract pulled on July 17, 2018.** **The MEDB 2019 extract pulled on July 9, 2019.** General Dynamics Information Technology (GDIT) is holding the MEDB 2018 and 2019 extracts pending final signatures on this agreement and CMS approval. **The MEDB 2020 extract should be pulled within 10 working days of July 10, 2020** and delivered to Census by August 1, 2020. The delivery should also include a record layout, SAS PROC Contents file, record count, all variables, and data dictionary as specified in this Attachment II and Attachment III – MEDB File Layout of this Addendum. **The delivery should also include the date the file was pulled.**
Format:	SAS Dataset
Data Variables:	See MEDB File Layout (Attachment III)
Transfer Media:	Encrypted data on CD/DVD
Documentation:	1) PROC Content of Dataset 2) Provide extractions/pull dates for both deliveries 3) Provide record count per Dataset 4) Name and telephone number of a technical advisor 5) Latest Data Dictionary

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000397

Delivery Method: **Traceable Delivery/Courier Service (Federal Express, UPS, etc.)**

Send Documentation and CDs/DVDs to:

Attention: **Michael Berning**
Assistant Division Chief
Data Acquisition and Curation
Economic Reimbursable Surveys Division, ERD
U.S. Census Bureau
4600 Silver Hill Road
HQ-5K123
Suitland, MD 20746
(301) 763-2028
Michael.a.berning@census.gov

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000398

MEDB File Layout

#	Field Name – MEDB	Field Name – LDS	Field Description	Start	Len	Type
1	CLMACNT	BENE_CLM_ACNT_NUM	Beneficiary Claim Account Number* *Forms the Health Insurance Claim (HIC) Number when combined with BENE_IDENT_CD (immediately below)	1	9	Char
2	IDENT	BENE_IDENT_CD	Beneficiary Identification Code* *Forms the Health Insurance Claim (HIC) Number when combined with BENE_CLM_ACNT_NUM (immediately above)	10	2	Char
3	FNAME	BENE_GVN_NM	Beneficiary First Name	12	15	Char
4	MINIT	BENE_MDL_NM	Beneficiary Middle Name	27	1	Char
5	LNAME1	BENE_SRNM_NAME1	Beneficiary Surname & Title (1) (Most current)	28	24	Char
6	LNAME2	BENE_SRNM_NAME2	Beneficiary Surname & Title (2) (Second most current)	52	24	Char
7	DOB	BENE_BIRTH_DT	Beneficiary Birth Date	76	8	Char
8	DOD	BENE_DEATH_DT	Beneficiary Death Date	84	8	Char
9	SEX	BENE_SEX_IDENT_CD	Beneficiary Sex	92	1	Char
10	RACE	BENE_RACE_CD	Beneficiary Race	93	1	Char
11	RPRSNTV	BENE_RPRSNTV_PYE_SW	Beneficiary Representative Payee	94	1	Char
12	ADDRESS1	BENE_MLG_CNTCT_ADR1	Beneficiary Mailing Contact Address (Segment 1)	95	22	Char
13	ADDRESS2	BENE_MLG_CNTCT_ADR2	Beneficiary Mailing Contact Address (Segment 2)	117	22	Char
14	ADDRESS3	BENE_MLG_CNTCT_ADR3	Beneficiary Mailing Contact Address (Segment 3)	139	22	Char
15	ADDRESS4	BENE_MLG_CNTCT_ADR4	Beneficiary Mailing Contact Address (Segment 4)	161	22	Char
16	ADDRESS5	BENE_MLG_CNTCT_ADR5	Beneficiary Mailing Contact Address (Segment 5)	183	22	Char
17	ADDRESS6	BENE_MLG_CNTCT_ADR6	Beneficiary Mailing Contact Address (Segment 6)	205	22	Char
18	MAILZIP9	BENE_MLG_CNTCT_ZIP_CD	Beneficiary Mailing Contact ZIP Code (Current ZIP)	227	9	Char
19	ZIP9OCC6	BENE_MLG_CNTCT_ZIP_CD	Beneficiary Mailing Contact ZIP Code (Last 6 ZIP Codes)	236	54	Char
20	RCTCHG	BENE_RSDNC_CHG_DATE	Beneficiary Residence Change Date (Latest change date)	290	8	Char
21	CHGDATE6	BENE_RSDNC_CHG_DATE	Beneficiary Residence Change Date (Last 6 change dates)	298	48	Char
22	STDCNTY	BENE_RSDNC_SSA_STD_CNTY_CD	SSA Standard County Code (Latest)	346	3	Char
23	STDSTATE	BENE_RSDNC_SSA_STD_STATE_CD	SSA Standard State Codes (Latest)	349	2	Char
24	SSN	BENE_SSN_NUM	Beneficiary Social Security Number	351	9	Char

AMERICAN OVERSIGHT

			(Latest)			
25	AENTSDAT	BENE_PTA_ENTLMT_STRT_DT	Part A Entitlement Start Date (Earliest)	360	8	Char
26	AENTTDAT	BENE_PTA_ENTLMT_TRMNTN_DT	Part A Entitlement End Date (Latest)	368	8	Char
27	BENTSDAT	BENE_PTB_ENTLMT_STRT_DT	Part B Entitlement Start Date (Earliest)	376	8	Char
28	BENTTDAT	BENE_PTB_ENTLMT_TRMNTN_DT	Part B Entitlement End Date (Latest)	384	8	Char
29	PMTSTAT	BENE_SSA_BNFT_PMT_STUS_CD	SSA Benefit Payment Status Code (Latest)	392	2	Char
30	MDCRSTUS	BENE_MDCR_STUS_CD	Beneficiary Status Code (Latest)	394	2	Char
31	UPDTHSTR	EDB_UPDT_HSTRY_CHG_DT	EDB Update History Change Date (Latest—YYYYMMDD)	396	8	Char
32	PRMRYPYR	BENE_PRMRY_PYR_CD	Beneficiary Primary Payer Code (Latest)	404	1	Char
33	ACRTN_DT	BENE_ACRTN_DT	Accretion Date	405	8	Char
34	LANG_CD	BENE_LANG_PREFNC_CD	Beneficiary Language Code	413	1	Char
35	DEATH_DT	BENE_SRC_DEATH_DT_CD	Beneficiary Source Death Date Code	414	2	Char
36	MDCR_DT	BENE_MDCR_STUS_CD_CHG_DT	Ben. Medicare Status Code Change Date	416	8	Char
37	BENE_ID	BENE_ID	Unique Identifier	424	15	Char

AMERICAN OVERSIGHT

Commerce/Census-8, Statistical Administrative Records System and Commerce/Census-3, Special Censuses, Surveys, and Other Studies

COMMERCE/CENSUS-8

SYSTEM NAME:
Statistical Administrative Records System. (December 13, 2016, 81 FR 76554)

SECURITY CLASSIFICATION:
None.

SYSTEM LOCATIONS:
Bowie Computer Center, Bureau of the Census, 17101 Melford Blvd., Bowie, Maryland 20715; and at a FEDRAMP-approved cloud services facility.

CATEGORIES OF INDIVIDUALS COVERED BY THE SYSTEM:
This system covers the population of the United States and territories. In order to approximate coverage of the population in support of its statistical programs, the Census Bureau will acquire administrative record files from agencies such as the Departments of Agriculture, Education, Health and Human Services, Homeland Security, Housing and Urban Development, Labor, Treasury, Veterans Affairs, the Office of Personnel Management, the Social Security Administration, the Selective Service System, and the U.S. Postal Service. Comparable data may also be sought from state agencies and commercial sources and Web sites.

CATEGORIES OF RECORDS IN THE SYSTEM:
Records in this system of records are organized into three components:

- The first category contains records with personal identifiers (names and Social Security Numbers (SSNs)), with access restricted to a limited number of sworn Census Bureau staff. These records are only used for a brief period of time while the personal identifiers are replaced with unique non-identifying codes. In a controlled Information Technology (IT) environment, the identifying information (SSN) contained in source files is removed and replaced with unique non-identifying codes. The Census Bureau does not collect SSNs in Title 13 surveys or censuses. Title 13, Section 6, authorizes the Census Bureau to acquire information from other federal departments and agencies and for the acquisition of reports of other governmental or private sources. Data acquired by the Census Bureau to meet this directive may include direct identifiers such as name, address, date of birth, driver's license number, and SSN. The direct identifiers are used to identify duplicate lists and link across multiple sources.
- The Census Bureau has developed software to standardize and validate incoming person records to assign a unique Census Bureau linkage identifier. This identifier, called the Protected Identification Key (PIK), is retained on files so that SSNs can be removed. This process occurs through the Person Identification Validation System (PVS). The PVS software processes direct identifiers from input files. Census Bureau staff use the person linkage keys to merge files when conducting approved research and operations activities. The software is also used to facilitate record linkage for Census Bureau research partners within the Federal Statistical System. Through legal

AMERICAN OVERSIGHT

agreements, linkage keys may be created by the Census Bureau for other Federal Statistical Agencies to produce statistics. The PVS system does not append additional identifying information, only a unique identifier to facilitate record linkage.

- The second category contains records that are maintained on unique data sets that are extracted or combined on an as-needed basis in approved projects. Records are extracted or combined as needed using the unique non-identifying codes, not by name or SSN, to prepare numerous statistical products. These records may contain information such as: Demographic information—date of birth, sex, race, ethnicity, household and family characteristics, education, marital status, tribal affiliation, and veteran's status, etc.; Geographical information—address and geographic codes, etc.; Mortality information—cause of death and hospitalization information; Health information—type of provider, services provided, cost of services, and quality indicators, etc.; Economic information—housing characteristics, income, occupation, employment and unemployment information, health insurance coverage, Federal and State program participation, assets, and wealth.
- The third category contains two types of records that use name data for specific research activities. The Census Bureau has policies and procedures to review and control name data from administrative records providers and third party sources. This category refers to name data used to plan contact operations for surveys and censuses and for research on names. The first type of records includes Respondent contact information—name (or username), address, telephone number (both landline and cell phone number), and email address or equivalent. The second type of records includes name data used to set Demographic Characteristics Flags—names are compared to lookup tables and used in models to assign sex and ethnicity. Records in this category are maintained on unique data sets that are extracted or combined on an as-needed basis using the unique non-identifying codes that replaced the SSNs, but with some name information retained.

AUTHORITY FOR MAINTENANCE OF THE SYSTEM:
Title 13 U.S.C. 6.

PURPOSES:
This system of records supports the Census Bureau's core mission of producing economic and demographic statistics. To accomplish this mission the Census Bureau is directed to acquire information from public and private sources to ensure the efficient and economical conduct of its censuses and surveys by using that information instead of conducting direct inquiries. To provide the information on which the American public, businesses, policymakers, and analysts rely, the Statistical Administrative Records System efficiently re-uses data from external sources, thereby eliminating the need to collect information again. Therefore, the purpose of this system is to centralize and control the use of personally identifiable information by providing a secure repository that supports statistical operations. The system removes SSNs contained in source files and replaces them with unique non-identifying codes called Protected Identification Keys (PIKs) prior to use by other Census Bureau operating units. Census Bureau staff use the PIK to merge files to conduct approved research projects. Through legal agreements documenting permitted uses of the external data, linked files may be created to produce statistics. By combining survey and census data with

AMERICAN OVERSIGHT

administrative record data from other agencies, and data procured from commercial sources, the Census Bureau will improve the quality and usefulness of its statistics and reduce the respondent burden associated with direct data collection efforts. The system will also be used to plan, evaluate, and enhance survey and census operations; improve questionnaire design and selected survey data products; and produce research and statistical products such as estimates of the demographic, social, and economic characteristics of the population.

ROUTINE USES OF RECORDS MAINTAINED IN THE SYSTEM, INCLUDING CATEGORIES OF USERS AND PURPOSES OF SUCH USES:
None. The Statistical Administrative Records System will be used only for statistical purposes. No disclosures which permit the identification of individual respondents, and no determinations affecting individual respondents will be made.

DISCLOSURE TO CONSUMER REPORTING AGENCIES:
None.

POLICIES AND PRACTICES FOR STORING, RETRIEVING, ACCESSING, RETAINING, AND DISPOSING OF RECORDS IN THE SYSTEM:

STORAGE:
Records will be stored in a secure computerized system and on magnetic media; output data will be electronic. Magnetic media will be stored in a secure area within a locked drawer or cabinet. Source data sets containing personal identifiers will be maintained in a secure restricted-access IT environment. Records may also be stored by or at a secure FEDRAMP-approved cloud service provider or facility.

RETRIEVABILITY:
Staff producing statistical products will have access only to data sets from which SSNs have been deleted and replaced by unique non-identifying codes internal to the Census Bureau. Only a limited number of sworn Census Bureau staff, who work within a secure restricted-access environment, will be permitted to retrieve records containing direct identifiers (such as name or SSN).

SAFEGUARDS:
The Census Bureau is committed to respecting respondent privacy and protecting confidentiality. Through the Data Stewardship Program, we have implemented management, operational, and technical controls and practices to ensure high-level data protection to respondents of our censuses and surveys.

- An unauthorized browsing policy protects respondent information from casual or inappropriate use by any person with access to Title 13 protected data.
- All Census Bureau employees, persons with special sworn status, as well as employees of FEDRAMP-approved cloud services who may have incidental access to Title 13 protected data, are subject to the restrictions, penalties, and prohibitions of 13 U.S.C. 9 and 214 as modified by Title 18 U.S.C. 3551, et. seq.; the Privacy Act of

AMERICAN OVERSIGHT

1974 (5 U.S.C. 552a(b)(4); 18 U.S.C. 1905; 26 U.S.C. 7213, 7213A, and 7431; and 42 U.S.C. 1306.

- All Census Bureau employees and persons with special sworn status will be regularly advised of regulations issued pursuant to Title 13 governing the confidentiality of the data, and will be required to complete an annual Data Stewardship Awareness training and those who have access to Federal Tax Information data will be regularly advised of regulations issued pursuant to Title 26 governing the confidentiality of the data, and will be required to complete an annual Title 26 awareness program. The restricted-access IT environment has been established to limit the number of Census Bureau staff with direct access to the personal identifiers in this system to protect the confidentiality of the data and to prevent unauthorized use or access. These safeguards provide a level and scope of security that meet the level and scope of security established by OMB Circular No. A-130, Appendix III, Security of Federal Automated Information Resources.
- All Census Bureau and FEDRAMP-approved computer systems that maintain sensitive information are in compliance with the Federal Information Security Management Act, which includes auditing and controls over access to restricted data.
- The use of unsecured telecommunications to transmit individually identifiable information is prohibited.
- Paper copies that contain sensitive information are stored in secure facilities in a locked drawer or file cabinet behind a closed door.
- Each requested use of the data covered in this SORN will be reviewed by an in-house Project Review Board to ensure that data relating to the project will be used only for authorized purposes. All uses of the data are solely for statistical purposes, which by definition means that uses will not directly affect benefits or enforcement actions for any individual. Only when the Project Review Board has approved a project, will access to information from one or more of the source data sets occur. Data from external sources in approved projects will not be made publicly available.
- Any publications based on the Statistical Administrative Records System will be cleared for release under the direction of the Census Bureau's Disclosure Review Board, which will confirm that all the required disclosure protection procedures have been implemented. No information will be released that identifies any individual.

RETENTION AND DISPOSAL:

Records are to be retained in accordance with General Records Schedule GRS 4.3, and the Census Bureau's records control schedule DAA-0029-2014-0005, Records of the Center for Administrative Records Research and Applications, which are approved by the National Archives and Records Administration (NARA). Records are also retained in accordance with agreements developed with sponsoring agencies or source entities. Federal tax information administrative record data will be retained and disposed of in accordance with Publication 1075, Tax information Security Guidelines for Federal, State, and Local Agencies and Entities. The Census Bureau issues an Annual Safeguard Security Report that includes information on the retention and disposal of federal tax information. Pursuant to IRS regulation, Title 26 U.S.C. 6103(p)(4)(F)(ii), data cannot be transferred to NARA.

SYSTEM MANAGER(S) AND ADDRESS:

AMERICAN OVERSIGHT

Commerce/Census-8, Statistical Administrative Records System and Commerce/Census-3, Special Censuses, Surveys, and Other Studies

Associate Director for Research and Methodology, U.S. Census Bureau, 4600 Silver Hill Road, Washington, DC 20233-8000.

NOTIFICATION PROCEDURE:
None.

RECORD ACCESS PROCEDURES:
None.

CONTESTING RECORD PROCEDURES:
None.

RECORD SOURCE CATEGORIES:
Individuals and addresses covered by selected administrative record systems and Census Bureau censuses and surveys including current demographic and economic surveys, quinquennial Economic Censuses, and decennial Censuses of Population and Housing. Additionally, the Census Bureau will also acquire administrative record files from agencies such as the Departments of Agriculture, Education, Health and Human Services, Homeland Security, Housing and Urban Development, Labor, Treasury, Veterans Affairs, the Office of Personnel Management, the Social Security Administration, the Selective Service System, and the U.S. Postal Service, etc. Comparable data may also be sought from state agencies, commercial sources, and Web sites.

SYSTEM EXEMPTIONS FROM CERTAIN PROVISIONS OF THE ACT:
Pursuant to 5 U.S.C. 552a(k)(4), this system of records is exempted from the notification, access, and contest requirements of the agency procedures (under 5 U.S.C. 552a(c)(3), (d), (e)(1), (e)(4)(G), (H), and (I), and (f)). This exemption is applicable as the data are maintained by the Census Bureau solely as statistical records, as required under Title 13, and are not used in whole or in part in making any determination about an identifiable individual. This exemption is made in accordance with the Department's rules which appear in 15 CFR part 4 Subpart B published in this Federal Register.

AMERICAN OVERSIGHT

Commerce/Census-8, Statistical Administrative Records System and Commerce/Census-3, Special Censuses, Surveys, and Other Studies

COMMERCE/CENSUS-3

SYSTEM NAME:
Special Censuses, Surveys, and Other Studies. (March 27, 2012, 77 FR 18205)

SECURITY CLASSIFICATION:
None.

SYSTEM LOCATIONS:
Bowie Computer Center, U.S. Census Bureau, 17101 Melford Blvd., Bowie, Maryland 20715, and U.S. Census Bureau, National Processing Center, 1201 East 10th Street, Jeffersonville, Indiana 47103; and National Archives and Records Administration, Washington National Records Center, Washington, DC 20409.

CATEGORIES OF INDIVIDUALS COVERED BY THE SYSTEM:
This system covers the population of the United States. Survey respondents typically are individuals aged 15 years old or over. Data collected directly from respondents may be supplemented with data from administrative record files received from other federal, state, or local agencies, or commercial sources. These files are collected and processed under the Statistical Administrative Records system. Administrative record files are from agencies including, the Departments of Agriculture, Education, Health and Human Services, Homeland Security, Housing and Urban Development, Labor, Treasury, Veterans Affairs, and from the Office of Personnel Management, the Social Security Administration, the Selective Service System, and the U.S. Postal Service. Comparable data may also be sought from State agencies and commercial sources. Please see the COMMERCE/CENSUS-8, Statistical Administrative Records System SORN for more information. Additionally, subjects of cognitive interviews (to test understanding of a new survey form, for example) are covered in this system of records.

CATEGORIES OF RECORDS IN THE SYSTEM:
Records in this system of records consist of working statistical files (i.e., those files being analyzed to produce survey results), survey data files (i.e., those files containing answers directly from the respondent), and/or data contact files (i.e., those files used for contacting respondents). Records in this system of records may contain information such as: Respondent contact information—telephone number, email address; Demographic information—date of birth, sex, race, ethnicity, household and family characteristics, mobility status, education, marital status, tribal affiliation, veteran's status, disability status; Geographical information—address and geographic codes; Health information—health problems, type of provider, services provided, cost of services, quality indicators; Economic information—housing and institutional characteristics, income, occupation, employment and unemployment information, health insurance coverage, federal and state program participation, assets and wealth; Activity and event related information—commuting, travel, childcare, recreation, consumer expenditures, community service, drug and alcohol use, and crime victimization; Field Representative (FR) related information—U.S. Census Bureau FR code, which is used only as an administrative control item for each record. Some records in this system of records may be obtained from datasets maintained by the COMMERCE/CENSUS-8, Statistical

AMERICAN OVERSIGHT

Commerce/Census-8, Statistical Administrative Records System and Commerce/Census-3, Special Censuses, Surveys, and Other Studies

Administrative Records System where direct identifiers have been replaced with a unique non-identifying code prior to delivery to this system of records, and, therefore are not on the working statistical files. These categories of records are maintained on unique data sets that are extracted or combined on an as needed basis using the unique non-identifying codes but with the original identifiers removed. These records may contain: Demographic information—date of birth, sex, race, ethnicity, household and family characteristics, education, marital status, Tribal affiliation, and veteran's status; Geographical information—address and geographic codes; Mortality information—cause of death and hospitalization information; Health information—type of provider, services provided, cost of services, and quality indicators; Economic information—housing characteristics, income, occupation, employment and unemployment information, health insurance coverage, Federal program participation, assets, and wealth. Another category of records contains two types of records that are maintained on unique data sets that are extracted or combined on an as-needed basis using the unique non-identifying codes but with some name information retained. One type of records contains: Business information—business name, revenues, number of employees, and industry codes in support of economic statistical products. The other type contains: Respondent contact information—name, address, telephone number, age, and sex in support of survey and census data collection efforts. See the COMMERCE/CENSUS-8, Statistical Administrative Records System SORN for more information. However, for limited short-term projects, some records obtained from datasets maintained by the COMMERCE/CENSUS-8, Statistical Administrative Records System may contain some direct identifiers (such as name, Social Security Number (SSN)) that have been retained in working statistical files for this collection. These short-term projects must present project and use proposal documentation to a team of high level managers, and obtain approval to use direct identifiers in these working statistical files. Additionally, direct identifiers collected from survey respondents are routinely maintained on data contact files in order to facilitate respondent contact or to pre-load data for a data collection instrument.

AUTHORITY FOR MAINTENANCE OF THE SYSTEM:
Title 13 U.S.C. 8(b), 182, and 196 provide the authority for the U.S. Census Bureau to conduct statistical surveys.

PURPOSES:
The purpose of this system of records is to collect statistical information from respondents through survey instruments or other means and to conduct methodological research on improving various aspects of surveys authorized by Title 13, U.S.C. 8(b), 182, and 196, such as: survey sampling frame design; sample selection algorithms; questionnaire development, design, and testing; usability testing of computer software and equipment; post data collection processing; data quality review; and non-response research.

ROUTINE USES OF RECORDS MAINTAINED IN THE SYSTEM, INCLUDING CATEGORIES OF USERS AND PURPOSES OF SUCH USES:
None. The data will be used only for statistical purposes. No disclosures which permit the identification of individual respondents, and no determinations affecting individual respondents are made.

AMERICAN OVERSIGHT

Commerce/Census-8, Statistical Administrative Records System and Commerce/Census-3, Special Censuses, Surveys, and Other Studies

DISCLOSURE TO CONSUMER REPORTING AGENCIES:
None.

POLICIES AND PRACTICES FOR STORING, RETRIEVING, ACCESSING, RETAINING, AND DISPOSING OF RECORDS IN THE SYSTEM:

STORAGE:
Records (including, but not limited to, sound files of survey or cognitive interviews or electronic datasets) will be stored in a secure computerized system and on magnetic media; output data will be electronic files or paper copies. Paper copies or magnetic media will be stored in a secure area within a locked drawer or cabinet. Data sets may be accessed only by authorized personnel. Control lists will be used to limit access to those employees with a need to know; rights will be granted based on job functions.

RETRIEVABILITY:
A limited number of sworn U.S. Census Bureau staff will be permitted to retrieve records containing direct identifiers (such as a name or SSN). Staff producing final statistical products will have access only to data sets from which direct identifiers have been deleted and replaced by unique non-identifying codes internal to the U.S. Census Bureau.

SAFEGUARDS:
The U.S. Census Bureau is committed to respecting respondent privacy and protecting confidentiality. Through the Data Stewardship Program, we have implemented management, operational, and technical controls and practices to ensure high-level data protection to respondents of our census and surveys. (1) An unauthorized browsing policy protects respondent information from casual or inappropriate use by any person with access to Title 13 protected data. (2) All employees permitted to access the system are subject to the restriction, penalties, and prohibitions of 13 U.S.C. 9 and 214, as modified by Title 18 U.S.C. 3551, et seq.; the Privacy Act of 1974 (5 U.S.C. 552a(b)(4)); and when applicable, Title 26 U.S.C. 7213, 7213A, and 7431; as well as any additional restrictions imposed by statutory authority of a sponsor. (3) All U.S. Census Bureau employees and persons with special sworn status will be regularly advised of regulations issued pursuant to Title 13 U.S.C. governing the confidentiality of the data, and will be required to complete an annual Title 13 awareness program; and those who have access to Federal Tax Information data will be regularly advised of regulations issued pursuant to Title 26 U.S.C. governing the confidentiality of the data, and will be required to complete an annual Title 26 awareness program. (4) All computer systems that maintain sensitive information are in compliance with the Federal Information Security Management Act, which includes auditing and controls over access to restricted data. (5) The use of unsecured telecommunications to transmit individually identifiable information is prohibited. (6) Paper copies that contain sensitive information are stored in secure facilities in a locked drawer or file cabinet behind a locked door. (7) Additional data files containing direct identifiers will be maintained solely for the purpose of data collection activities, such as respondent contact and pre-loading an instrument for a continued interview, and will not be transferred to, or maintained on, working statistical files. (8) Any publications based on this system will be cleared for release under the direction of the U.S. Census Bureau's Disclosure Review Board, which will

AMERICAN OVERSIGHT

confirm that all the required disclosure avoidance procedures have been implemented and no information that identifies any individual is released.

RETENTION AND DISPOSAL:
Records are to be retained in accordance with the General Records Schedule and U.S. Census Bureau's records control schedules that are approved by the National Archives and Records Administration. Generally, records are retained for less than 10 years, unless a longer period is necessary for statistical purposes or for permanent archival retention.

SYSTEM MANAGER(S) AND ADDRESS:
Associate Director for Demographic Programs, U.S. Census Bureau, 4600 Silver Hill Road, Washington, DC 20233-8000.

NOTIFICATION PROCEDURE:
None.

RECORD ACCESS PROCEDURES:
None.

CONTESTING RECORD PROCEDURES:
None.

RECORD SOURCE CATEGORIES:
Individuals and populations covered by selected administrative records systems and U.S. Census Bureau surveys and special censuses.

SYSTEM EXEMPTIONS FROM CERTAIN PROVISIONS OF THE ACT:
Pursuant to Title 5 U.S.C. 552a(k)(4), this system of records is exempted from the notification, access, and contest requirements of the agency procedures (under 5 Title U.S.C. 552a(c)(3), (d), (e)(1), (e)(4)(G), (H), and (I), and (f)). This exemption is applicable as the data are maintained by the U.S. Census Bureau and required by Title 13 to be used solely as statistical records and are not used in whole or in part in making any determination about an identifiable individual. This exemption is made in accordance with the Department's rules, which appear in 15 CFR part 4 subpart B, and in accordance with agency rules published in the rules section of this Federal Register.

AMERICAN OVERSIGHT

AMERICAN OVERSIGHT

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU ACQUIRES
CERTAIN REFUGEE DATA
FROM THE DEPARTMENT OF STATE
Bureau of Population, Refugees, and Migration (PRM)
Agreement No. #2064-FY20-NFE- 0333

1. PARTIES AND PURPOSE

This Memorandum of Understanding ("MOU" or "this agreement") establishes an agreement between the U.S. Census Bureau (hereinafter "the Census Bureau"), which is a component of the U.S. Department of Commerce, and the United States Department of State Bureau, of Population, Refugees, and Migration (hereinafter "PRM") for the acquisition of certain data in the Worldwide Refugee Admissions Processing System (WRAPS) that is relevant to the determination of the number of citizens, non-citizens, and illegal aliens in the United States , per the July 11, 2019, Executive Order (EO) 13880: Collecting Information about Citizenship Status in Connection with the Decennial Census.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code. The authority for PRM to share data and enter into this agreement is 5 U.S.C.§ 552a(b)(4) ("the Census exception"), which authorizes disclosure of Privacy Act-protected records to the Census Bureau "for purposes of planning or carrying out a census or survey or related activity pursuant to the provisions of Title 13." PRM also enters into this agreement under the authority of 13 U.S.C. § 6(a), in response to the Census Bureau's call for information pertinent to the work provided for in Title 13 of the U.S. Code as well as Executive Order 13880, 84 Fed. Reg. 33,831 (Jul. 11, 2019), which calls for "all agencies to promptly provide the Department [of Commerce] the maximum assistance permissible, consistent with law, in determining the number of citizens, non-citizens, and illegal aliens in the country."

3. TERMS AND CONDITIONS

Pursuant to this agreement, State Department PRM will provide an extract of data in the Worldwide Refugee Admissions Processing System (WRAPS) to the Census Bureau. All data that State Department PRM agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, § 9, and the Privacy Act, 5 U.S.C. § 552a (b)(4). To the extent provided by law, only Census Bureau staff and those Special Sworn Status ("SSS") researchers participating in the projects listed in Attachment A will have access to the data. Access shall be limited to the minimum number of individuals necessary. The Census Bureau represents and warrants further that, the Census Bureau shall not disclose, release, reveal, show, sell, rent, lease, loan, or otherwise grant access to the original data covered by this Agreement to any unauthorized person or entity. Any data, records, or

AMERICAN OVERSIGHT

other information shared through this agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to these data, it may not be disclosed in an individually-identifiable form that permits the identification of any individual respondents, businesses, organizations, or institutions, and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the WRAPS data to census data, survey data and administrative records data. To the extent provided by law, the Census Bureau will recognize PRM as the owner of the original data in the form that it is delivered to the Census Bureau, prior to its integration with confidential Census data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the data to provide new and improved estimates of population characteristics related to citizenship. The Census Bureau will also ensure that original WRAPS data is not directly provided to researchers.

This agreement does not obligate the funds of either party to the agreement. Each party will assume its own costs; and if funding transfers are required, they will be executed through written amendment to the agreement.

A. PRM agrees:

To transfer to the Census Bureau via a secure and encrypted Department of State-approved medium WRAPS data as described in the Statement of Work in Attachment B as soon as possible after signing the MOU but no later than December 31, 2019. A second transfer with WRAPS data described in the Statement of Work in Attachment B will be created with a vintage of April 1, 2020, and sent to the Census Bureau as soon as possible but no later than July 31, 2020. Approved transfer mediums may include use of an encrypted, external hard drive mounted via Universal Serial Bus (USB).

i. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, record length and data dictionary.

ii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the WRAPS data.

iii. To allow the Census Bureau staff and SSS researchers to use the WRAPS data for the projects listed in Attachment A and for any additional projects as may be approved in writing by both parties

B. The Census Bureau agrees:

i. To permit access to the administrative data transmitted by PRM only to the Census Bureau staff and SSS researchers only for the projects listed in Attachment A or those approved in writing by both parties.

AMERICAN OVERSIGHT

ii. To notify PRM staff when the transfer of the data is completed successfully or whether transfer is not completely successful.

iii. To return any Department of State-provided external media back to the Department within 10 business days of delivery.

iv. To ensure data transmission and storage is conducted in accordance with the provisions of Office of Management and Budget (OMB) Memorandum 06-16.

v. To immediately notify PRM of any discovery of unauthorized use of or access to WRAPS data.

4. CONTACTS

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of PRM and the Census Bureau, respectively:

State Department PRM POC:

Nicole Patel
Deputy Director, Refugee Processing Center
Bureau of Population, Refugees, and Migration
U.S. Department of State
1401 Wilson Boulevard
Arlington, VA 22209
(703) 907-7288
pateinj@state.gov

Census Bureau POC:

Michael Berning
Assistant Division Chief
Economic Reimbursable Surveys Division
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-2028
michael.a.berning@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change within fifteen (15) days of such change.

The parties mutually agree that the following named individual is designated as "Custodian" of the files on behalf of the Census Bureau and will be personally responsible for the observance of all conditions of use and for establishment and maintenance of security arrangements as specified in this Agreement to prevent unauthorized activity and use. The Census Bureau agrees to notify PRM within fifteen (15) days of any changes of custodianship. The parties mutually agree that PRM may disapprove the appointment of a custodian or may require the appointment of a new custodian at any time.

AMERICAN OVERSIGHT

Custodian:

Lori Fox
Chief, Information Owner Staff
Economic Reimbursable Surveys Division
U.S. Census Bureau
4600 Silver Hill Road
Washington, DC 20233
301-763-3404
Lori.anne.fox@census.gov

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement shall terminate three (3) years following the date on which it becomes effective. If, at the end of three (3) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, **in order to determine whether it should be revised, renewed or canceled.** The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and PRM's Director of the Refugee Processing Center. Notwithstanding all other provisions of this agreement, the parties agree that:

A. This agreement may be amended at any time by written mutual consent of both parties.

B. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

7. DATA GOVERNANCE

At the time of signing, the Census Bureau will have in place the following data security and information assurance standards, and appropriate safeguards and procedures designed to protect against unauthorized activity, use, and disclosure of information obtained under the terms of this MOU.

A. Data Security and Information Assurance Standards:

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence and to use the data for statistical purposes only in accordance with the provisions of Title 13, United States Code. Per the Federal Cybersecurity Enhancement Act of 2015, these data are protected from cybersecurity risks through screening of the systems that transmit the data. Upon receipt, all data acquired as a result of this interagency

AMERICAN OVERSIGHT

agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with the National Institute of Standards and Technology (NIST) Federal Information Processing Standards (FIPS) 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (Pub. L. 107-347, 116 Stat. 2899 (2002)). All systems are fully assessed against NIST Special Publication 800-53r4, "Recommended Security Controls for Federal Information Systems and Organizations," as well as Special Publication 800-37r1, "Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach." The Census Bureau Information Technology Security Program is reviewed annually by the Department of Commerce Office of the Chief Information Officer (CIO), as well as the Department of Commerce Office of Inspector General as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199, "Standards for Security Categorization of Federal Information and Information Systems," and NIST Special Publication 800-60r1, "Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices." Security controls and subsequent assessments are done based on the final categorization.

Cloud providers must be approved for at least moderate level information through the GSA Federal Risk and Authorization Management Program (FedRAMP) process prior to acquiring any services. The Census Bureau identifies, assesses and authorizes use based on the published FedRAMP results and an assessment of any Census Bureau (customer provided) controls implemented to protect the infrastructure and data. Security reporting on cloud providers is reported to the Department of Commerce on a regular basis under the Federal Information Security Management Act (FISMA) of 2014.

Title 13, §9 of the United States Code (U.S.C.) requires the Census Bureau to keep confidential and the information collected from the public under the authority of Title 13. § 214 of Title 13, U.S.C., and §§ 3551, 3559 and 3571 of Title 18, U.S.C., provide for the imposition of penalties of up to five years in prison and/or up to $250,000.00 in fines for wrongful disclosure of confidential census information.

Disclosure avoidance is the process for protecting the confidentiality of data, as required under Title 13 U.S.C. A disclosure of data occurs when someone can use published statistical information to identify and individual who has provided confidential information under a pledge of confidentiality. For data tabulations, the Census Bureau uses disclosure avoidance procedures to modify or remove the characteristics that put confidential information at risk for disclosure. Although a published table may appear to show information about a specific individual, the Census Bureau has taken steps to disguise or suppress the original data, while making sure the results are still useful. The techniques used by the Census Bureau to protect confidentiality in tabulations vary, depending on the type of data.

Noise injection is the Census Bureau's preferred disclosure avoidance technique. By policy, noise injection is to be applied to all data products that are reported with geographies smaller than a state. In cases when it is not feasible to fully implement noise injection within the period of the contract, a transition plan for implementing noise injection or other provable privacy methods must be developed in coordination with the Census Bureau. Noise injection may be required for microdata releases,

AMERICAN OVERSIGHT

depending on the characteristics of the microdata and the specific variables that are to be released. Data that cannot be publicly released may still be analyzed within the Federal Statistical Research Data Centers (FSRDCs) by individuals who have Special Sworn Status; the results of such analyses must still go through a disclosure avoidance process prior to being publicly released.

The parties understand that Title 13 confidentiality protection and disclosure avoidance techniques apply to all work described in this agreement. The disclosure avoidance disclosure methods are defined by the Census Bureau who has the responsibility of carrying out that work. Accordingly, upon completion of the tabulation, the data produced must be reviewed by the Census Bureau to ensure that no identifiable Title 13 data are or may be disclosed. Should the Census Bureau's Disclosure Review Board (DRB) determine that the requested statistical product does or reasonably could result in such disclosure, then the data product will be modified prior to approval for release to the party(ies) of this agreement. The DRB must approve before a research product can be released to an individual who does not have Special Sworn Status (SSS) and a need to know, or moved to a computer not approved for controlled data according to Census' existing policies and procedures.

B. Safeguards

i. Prevention of Misuse

The Census Bureau hereby agrees to take appropriate action to penalize misuse, alteration, deletion or any other unauthorized access of WRAPS data by Census Bureau personnel under the Foreign Affairs Manual and applicable civil and criminal laws and assure compliance with the protections provided by the Privacy Act.

ii. Access Authorization and Controls

a. Access Authorization

i. PRM and the Census Bureau will provide points of contact and will inform each other of the name and title of their respective Program Administrators, as outlined in Section 4.

ii. The Census Bureau will be responsible to prevent and/or detect unauthorized access to, or use of, the information contained in WRAPS data by Census Bureau personnel and SSS researchers.

b. Access Controls

i. The Census Bureau will restrict access to all WRAPS data to those personnel who have received the appropriate clearances required for all government (including detailees) and contractor personnel accessing Census Bureau data and systems.

ii. The Census Bureau is responsible for the set up and maintenance of user accounts, regarding access to the data referenced in Section 3, subject to consultation with PRM on requirements. Census Bureau personnel shall securely log onto the Census Bureau network prior to accessing the data described in Section 3.

AMERICAN OVERSIGHT

iii. Unauthorized Activity

a. The Census Bureau and PRM acknowledge that the term "unauthorized activity" includes, but is not limited to, unauthorized or accidental access, use, dissemination, disclosure, storage, or disposal of WRAPS data.

b. The Census Bureau acknowledges that it will be responsible for preventing, detecting, reporting, and responding to unauthorized activity by Census Bureau personnel, including employees, contractors, and detailees from third party agencies, in accordance with the Privacy Act, other applicable federal guidance, and this MOU.

c. The Census Bureau will promptly take appropriate disciplinary or remedial action and immediately notify PRM when it learns that unauthorized activity has occurred.

d. The Census Bureau maintains a policy regarding the reporting of and response to losses of protected data in accordance with OMB Memorandum M-17-12. Known or suspected losses of protected data must be reported within one (1) hour to the United States Computer Emergency Readiness Team (US CERT).

e. The Census Bureau acknowledges its requirement to report any suspected or confirmed data breach involving PRM's data to Diplomatic Security's Computer Incident Response Team (DS CIRT) at CIRT@state.gov within one (1) hour of the detection of the breach. The Census Bureau shall also provide such information immediately or not more than 24 hours to the Refugee Processing Center Security Team and SecurityTeam@wrapsnet.org and Help Desk at Help@wrapsnet.org.

f. The Census Bureau undertakes to assist PRM with investigation of potential unauthorized activity by Census Bureau personnel related to WRAPS data.

g. The Census Bureau will report to PRM the final outcome of any investigation of a breach or improper disclosure of WRAPS data by Census Bureau personnel, including disciplinary action taken against Census Bureau users who commit unauthorized activity or misuse of WRAPS data in another manner.

iv. Periodic Internal Inspections

PRM will conduct periodic safeguard reviews of Census Bureau's systems to assess whether security and confidentiality of WRAPS data is maintained in accordance with the Privacy Act of 1974, PRM policies, and the safeguarding protocols and requirements outlined in the terms of this agreement.

Periodic safeguard reviews will include:

a. The assessment of the Census Bureau's location; other locations only by mutual agreement;

b. The testing of controls for computer systems storing, processing, or transmitting WRAPS data;

AMERICAN OVERSIGHT

c. A review of the Census Bureau's recordkeeping, policies, and interviews of Census Bureau employees and SSS researchers to verify the use of Personally Identifiable Information (PII) and assess the adequacy of procedures established to protect WRAPS data.

All on-site safeguard assessments will be collaborative efforts between PRM and the Census Bureau to ensure compliance with this agreement and all relevant laws, regulations, and policies. Census Bureau will support timely mitigation of identified risks and/or vulnerabilities.

8. DATA TRANSMISSION, STORAGE, AND RETENTION

A. Data Transmission

In transmitting data under this MOU, the Census Bureau and PRM will utilize mutually acceptable technical specifications and security protocols as agreed by technical representatives of the Census Bureau and PRM.

i. Method of Transmission

PRM shall provide data to the Census Bureau through a Department of State-approved mechanism. This may include use of secure and encrypted Department of State-approved external USB Hard Drive.

ii. Specified Data Elements

All data elements provided by PRM are protected by 13 U.S.C. § 9, the Privacy Act, 5 U.S.C. § 552a, *et seq.*, and as outlined in Section 7 of this agreement, including:

1. Alien Number
2. First name
3. Last name
4. Middle name
5. Date of birth
6. Place of birth (country)
7. Sex
8. Post Arrival Street address *(this is self-reported data based on where the refugee lived 90 days after arrival)*
9. City
10. State
11. Zip Code
12. Case Type [Refugee, SIV or Amerasian]
13. Date of Arrival

B. Records Storage

The storage of WRAPS data will be conducted in accordance with the provisions of OMB Memorandum 06-16, PRM policies, the safeguarding protocols described in Refugee Case Record SORN, State-59, and the requirements outlined in the terms of

AMERICAN OVERSIGHT

this agreement. This shall include encryption of data at rest for any originally provided or linked data sets that include PII provided by the Department of State.

C. Records Retention

All original source data received from State Department PRM will be destroyed two (2) years after receipt. Department of State data integrated into Census Bureau systems to support the projects listed in Attachment A, will become Census Bureau records and retained indefinitely. The Census Bureau shall provide proof of data destruction upon the completion of the data retention timeframe.

Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original WRAPS data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law. This complies with the Census Bureau's record retention schedule that states that the retention period for original files from outside sources will be destroyed when two (2) years old or as contract specifies. The Census Bureau agrees to notify State Department PRM within thirty (30) days of the completion of research if the purpose is completed before this aforementioned retention period. Upon such notice or at the end of the above-mentioned retention date, whichever occurs sooner, the Census Bureau will destroy such data. The Census Bureau acknowledges that stringent adherence to the aforementioned retention period is required and that the Census Bureau shall ask PRM for instructions under this paragraph if instructions have not been received within thirty (30) days after the retention period ends. When the Census Bureau destroys the data, the Census Bureau agrees to certify the destruction of the files in writing within thirty (30) days of receiving State Department PRM instructions. A statement certifying this action must be sent to the State Department PRM. The Census Bureau agrees that no data from the WRAPS records, or any parts thereof, shall be retained when the aforementioned files are destroyed unless authorization in writing for the retention of such files has been received from the point of contact as identified in Section 4 of this Agreement.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from State Department PRM data will be restricted to the projects defined in the attachment of the agreement and will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of records with linkage identifiers and WRAPS data linked to other data as part of the projects described in Attachment A will not be discontinued due to expiration or termination of this agreement but will be limited to the authorized uses as defined in Attachment A.

To promote organizational transparency, and in support of data discovery for current and future research projects, the Census Bureau posts non-sensitive data documentation to public-facing websites. This documentation, such as a record layout or data dictionary, can include file descriptions, variable lists, variable labels, and valid values for each variable.

9. NO THIRD PARTY RIGHTS OR BENEFITS

This MOU is not intended and should not be construed to create any right or benefit, substantive or procedural, enforceable at law or otherwise by any third party against the participants, their parent agencies, the United States, or the officers, employees, agents

AMERICAN OVERSIGHT

or other associated personnel thereof. The parties will seek to resolve any disputes regarding this agreement by mutual consultation.

10.INTERPRETATION AND SEVERABILITY

Nothing in this MOU is intended to conflict with current law or regulation. If a term of this agreement is inconsistent with such authority, then that term shall be invalid to the extent of the inconsistency, but the remaining terms and conditions of this MOU shall remain in full force and effect.

11. ENTRY INTO FORCE

This MOU, which consists of twelve (12) numbered Sections, will commence when signed by both parties.

12. APPROVALS

On behalf of the Census Bureau, the undersigned individual hereby attests that he or she is authorized to enter into this Agreement and agrees to all the terms specified herein.

K Deardorff 1/7/2020

Kevin Deardorff
Chief, Economic Reimbursable Surveys Division
U.S. Census Bureau

(Date)

On behalf of PRM, the undersigned individual hereby attests that he or she is authorized to enter into this Agreement and agrees to all the terms specified herein.

Carol O'Connell 1/6/2020

Carol O'Connell
Acting Assistant Secretary
Bureau of Population, Refugees, and Migration
U.S. Department of State

(Date)

AMERICAN OVERSIGHT

about:blank

Social Security Administration

AGREEMENT COVERING REIMBURSABLE SERVICES

JOB NUMBER				
RASSNV20R395	CAN:	4008048	SOC:	6163
	SSA DUNS/BPN:	927645598	SSA TAS:	028 2020 2020 8704
	SSA BETC:	COLL	SSA ALC:	28040001
	SSA EIN:	526004813		

REQUESTING ORGANIZATION

PROGRAM CONTACT NAME/ADDRESS/PHONE#
DEPARTMENT OF COMMERCE
CENSUS BUREAU

Denise Flanagan-Doyle
U.S. Census Bureau
4600 Silver Hill Road
Suitland, MD 20746
(301) 763-3060

FINANCIAL CONTACT NAME/ADDRESS/PHONE#
Robin Sommerville
4600 Silver Hill Road
Suitland, MD 20746
(301) 763-9543

SUBJECT TO THE AVAILABILITY OF FUNDS - DRAC

ACCOUNTING DATA (for Federal Government Agencies)

Appropriation/TAS:	013 ~~2019 2021~~ 0450 000
ALC:	13040001 2020 2022
BETC:	DISB
DUNS/BPN:	929955383

EMPLOYER IDENTIFICATION NUMBER (EIN)
530204537

BEGINNING AND ENDING DATES
10/01/2019 through 09/30/2020

TYPE OF SERVICE REQUESTED

PROJECT TITLE OR KIND OF SERVICE
Numident Extract - Quarterly Updates FY20-24

DESCRIPTION OF SERVICES
SSA will provide the U.S. Census Bureau 100 Percent of SSA's NUMIDENT Extract including Quarterly updates with an estimated volume of 30,000,000 for Fiscal Year 2020.

REFERENCES TO CORRESPONDENCE ON THIS MATTER (copies attached)
Refer to accompanying legal agreement.

SSA PROJECT COORDINATOR

NAME
Sheron M. Matthews

OFFICE
ORDP DEP COMMISSIONER/ORDP ODEPP OAC/ORDP ODEPP ODX DIV

SSA CONTACT FOR INFORMATION PERTAINING TO THIS AGREEMENT

NAME
Sheron M. Matthews

OFFICE
ORDP DEP COMMISSIONER/ORDP ODEPP OAC/ORDP ODEPP ODX DIV

ESTIMATED COST AND FINANCING OF SERVICES

ESTIMATED COST OF SERVICES $ 12,291.21
Project: ~~0750E01~~ 6750F01 KED 10/23/19
Org Code: 11-26-2064-00-00-01
Object Class: 25-30-07-00
Customer Agreement Number: 2064-19-PAY-010

FINANCING (Check one):			
ADVANCE PAYMENT	(In Full)	N/A
	(Quarterly)	N/A
IPAC		X

SSA AUTHORIZATION

PRINTED NAME Laura Train
TITLE Associate Commissioner

SIGNATURE [signature] for Laura Train **DATE** 9/25/19

ACCEPTANCE - FOR USE OF REQUESTING ORGANIZATION

Please provide the services requested above. We agree to pay you the full cost of such services in the amount estimated above prior to any work being performed, and we also agree to all of the terms and conditions stated in the accompanying Memorandum of Agreement.

NAME OF ORGANIZATION'S PROJECT COORDINATOR
Denise Flanagan-Doyle

TITLE
Survey Statistician

NAME & SIGNATURE OF AUTHORIZING OFFICIAL
Kevin Deardorff [signature] for KED

TITLE Chief, Economic Reimbursable Surveys Division

DATE 9/27/19

Form SSA-1235 (11-2014) Destroy Prior Editions

AMERICAN OVERSIGHT

REIMBURSABLE MEMORANDUM OF UNDERSTANDING
BETWEEN
THE SOCIAL SECURITY ADMINISTRATION (SSA)
AND
THE CENSUS BUREAU (CENSUS)
THE SSA 100% NUMIDENT FILE AND QUARTERLY UPDATES

Effective Date: October 1, 2019
Expiration Date: September 30, 2024
SSA Agreement Number: 100044
Census Agreement Number: RASSNV20395

I. Purpose

This Memorandum of Understanding (MOU) between SSA and Census sets forth the terms, conditions, and safeguards under which SSA will disclose personally identifiable information (PII) to Census for purposes of planning or carrying out a census or survey or related activity pursuant to the provisions of Title 13 of the United States Code (Title XIII). Under this MOU, SSA will disclose PII from the Master Files of Social Security Number (SSN) Holders and SSN Applications (the "Numident") for research and statistical purposes only. This MOU also authorizes Census's continued retention and use of Numident data obtained under past agreements under which SSA disclosed Numident file and quarterly update information to Census for the same purposes.

II. Legal Authority

SSA's authorities to disclose information to Census are 5 U.S.C. § 552a(b)(4), 20 C.F.R. § 401.185(a), 42 U.S.C. § 405(r)(5), and 42 U.S.C. § 1306, which also serves as transfer authority.

Census's legal authority for access and use of the information under this MOU is 13 U.S.C. § 6. Census's legal authority to appoint Special Sworn Status staff, who may access SSA information under this MOU, is 13 U.S.C. § 23(c).

Census will use the Numident records obtained under this and earlier MOUs for authorized research and statistical purposes only and will not use such records to make decisions concerning the rights, benefits, or privileges of specific individuals. As such, this MOU is exempt from the computer matching requirements in the Privacy Act of 1974, as amended by the Computer Matching and Privacy Protection Act of 1988. 5 U.S.C. § 552a(a)(8)(B)(ii).

III. Description of Data and Systems Involved

SSA will disclose and authorizes continued retention and use of previously provided PII from SSA's Master Files of Social Security Number (SSN) Holders and SSN Applications, SORN 60-0058, last fully published at 75 FR 82121 (December 29, 2010), and amended at 78 FR 40542 (July 5, 2013); 79 FR 8780 (February 13, 2014); 83 FR 31250-31251 (July 3, 2018); and 83 FR 54969 (November 1, 2018).

Data elements within the Numident have varying degrees of accuracy. SSA will advise on the degree of accuracy for individual data elements, as requested by Census. Citizenship data, as

AMERICAN OVERSIGHT

recorded in SSA systems, is obtained at the time of an individual's application for an SSN and may not be current.

All references to Numident or SSA data, data obtained from SSA, data covered by this agreement, and data provided by SSA under this agreement shall be read to extend to both newly provided Numident data (on or after the effective date of this agreement) and Numident data previously provided under past agreements that Census continues to maintain.

Census will maintain the PII received under this and earlier MOUs in the following Privacy Act system of record: Commerce/Census 8, "Statistical Administrative Records System" (System). Census use of the System is for statistical purposes only. This System of Records Notice does not have any routine use disclosure provisions.

IV. Responsibilities of the Parties

A. SSA's Responsibilities.

1. SSA will prepare the Numident File documentation, which will contain a copy of the record layout, record length and data dictionary. SSA will send the Numident File documentation to Census's Project Coordinator for this MOU. The SSA Project Coordinator will respond to any questions concerning the Numident File documentation.

2. SSA will provide an extract of all fields in the Numident File to Census on a quarterly basis. SSA will exclude any data elements it determines are legally restricted or not relevant and necessary for the Census research described in this agreement.

B. Census Responsibilities.

1. Census will pay SSA for the quarterly updates to the Numident in the amount specified on the accompanying Form SSA-1235.

2. Prior to internal dissemination of information from the Numident file for authorized research and statistical purposes, Census will replace all SSNs with unique non-identifying codes. Census will limit access to SSNs from the Numident file to Census employees and those working for Census under Title 13 Special Sworn Status (SSS) (collectively, "Census staff") who work within a secure restricted-access environment and have a need for the identifying information for an authorized research or statistical project.

3. Census will ensure all Numident data acquired under this MOU may only be accessed and used at Census Headquarters and Census controlled and operated Federal Statistical Research Data Centers (FSRDCs), by Census staff, for projects authorized under this Agreement. Census must obtain SSA prior written approval to transmit Numident data to any other location. Before requesting SSA written approval for offsite transmission, Census must obtain explicit permission from its Data Stewardship Executive Policy Committee approving the transfer (which requires adherence to a Census-approved security protocol).

4. Census will restrict access to the SSA Numident data to a minimal number of Census staff who need the information for authorized research (as described in Section VI of this MOU).

AMERICAN OVERSIGHT

Census is responsible for the compliance of its staff, including those working for Census under SSS, with the terms of this agreement.

5. Census must provide quarterly project reports to SSA of all research and statistical projects using Numident data. Census will submit its quarterly reports to SSA on the first day of each quarter (January 1, April 1, July 1, and October 1) of each year for the life of this agreement. Census written quarterly reports will contain a list of all projects using Numident information for the life of this agreement, including newly added or modified projects from the quarterly period that is the subject of the report. Such quarterly project reports must include the following information: project name; description of new project or modification; project being modified, where applicable; specific Numident data involved; data sets to be linked to Numident data; staff involved in the linkage and project; where data will be accessed. In addition to staff reported to be involved with a specific linkage and project, Census must report any other staff that have access to, or are responsible for managing Census staff that will have access to, Numident data.

6. If SSA has a concern about a specific project, the Office of Research, Evaluation and Statistics (ORES) will notify the Census project officer in writing what its concerns are and that work on the project cannot begin or, in the case of a current project, continue until SSA's concerns are addressed. If SSA's concerns have been appropriately addressed, SSA will notify Census in writing that work on the project may begin or resume. If Census cannot address SSA's concerns or SSA determines the project involves an inappropriate use of SSA's Numident data, SSA will notify Census in writing that it has not approved the project and the project must not use Numident data.

7. Census will comply with the disclosure avoidance reporting requirements in Section V.C of this MOU.

8. Census will provide a copy of the Certification and Accreditation to the SSA Agreement Project Officer. Census's Authority to Operate (ATO) letter must be signed and dated by the authorizing official of the system housing the Numident data and delivered to SSA's Chief Information Security Officer.

V. Authorized Census Uses and Restrictions of the Numident

A. Authorized Uses of Numident Data

Census may use Numident data for the below SSA-authorized research and statistical purposes only:

1. The research and statistical projects described in Attachment A. All projects in Attachment A must conform to all requirements and limitations in the agreement (including but not limited to those in § VI.B); changes to such requirements and limitations require an agreement modification and cannot be modified through written project approval.

2. Person Identification Validation System (PVS): Census developed software to standardize and validate incoming person records to assign a unique Census linkage identifier. The software relies on Numident data to conduct validation. Census retains this identifier, called the Protected Identification Key (PIK), on files so that SSNs can be removed. This process occurs through the PVS. The PVS software processes direct identifiers from input

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000424

files. Census may use PVS only in internal research and statistics projects authorized under this MOU. The PVS system does not append additional identifying information, only a unique identifier to facilitate record linkage.

3. As part of its internal decennial census research and statistical work, the Census may use demographic characteristics from the Numident (such as name, date of birth, age, sex, race/Hispanic origin, date of death, citizenship information as recorded in SSA records, and country of origin) for direct substitution or replacement of information collected during, or missing from, the Census's decennial censuses. Census may also use such demographic characteristics in its internal efforts to test and improve the decennial censuses and demographic and economic surveys. Such authorized uses include the unduplication of public, private, and census lists; and modeling to design and assign resources to carry out the census or surveys.

4. In addition to authorized purposes 1 through 3 above, Census may modify or add new projects to the list of authorized research and statistical projects that may use Numident data, without SSA's Agreement Project Officer approval, if Census determines the modified or new project meets the following criteria:

   I. The project is a research and statistical activity that is for the purpose of planning or carrying out a census or survey or related activity pursuant to the provisions of Title 13.

   II. The project otherwise meets all requirements and limitations of this agreement, including but not limited to:

      1. There is no re-dislosure or publication of Numident data in a manner not authorized access under this MOU.
      2. The Numident data will be maintained, accessed, and otherwise used in authorized locations and under the other security requirements in this MOU.
      3. The Numident data will not be used to make decisions concerning the rights, benefits, or privileges of specific individuals.

   New or modified projects that do not meet the above criteria require SSA written approval prior to use of Numident data and being considered an authorized project under this MOU. To request SSA written approval for a project, Census must file a written request with SSA's Agreement Project Officer that includes the information requested in quarterly project reports. The written request must include the same information as provided in the quarterly reports. See section IV.B.5 above. All projects are subject to the reporting requirements in Section IV.B.5 above.

B. Restrictions on Use and Release of Numident Data

Census will follow the below restrictions on its use and release of Numident data:

1. Census will limit its use of Numident data to authorized research and statistical projects as described in this MOU.

2. Census may not use the Numident data to validate SSNs for purposes other than those described in this MOU. All validation results must be safeguarded under the terms of this MOU (i.e., results must be treated like Numident data and PII). Census will not use Numident data or PVS to validate SSNs or other information for other agencies or entities.

AMERICAN OVERSIGHT

3. All person-level Numident data, including that used in direct substitution and replacement, must remain internal at Census and must not be publicly released in any form (including through release with decennial census data after 72 years).

4. Census will not re-disclose PII they receive under this MOU to any third party, unless required by law. If release of data derived from or based on data from the Numident is required by law, Census must notify SSA of the data to be disclosed and legal requirement for the disclosure at least twenty-four hours before the data is disclosed.

5. Census is authorized to use the disclosure review process described in Section VI.C of the MOU to publish statistical products resulting from authorized research and statistical projects under this MOU.

C. Disclosure Avoidance

Disclosure avoidance is the process for protecting the confidentiality of data when preparing statistical products (e.g., tabulations, regression estimates) for release to the general public. A prohibited disclosure of data occurs when published information can be used to reliably identify an individual whose information was used in compiling the product or sub-portions thereof. Disclosure avoidance procedures modify or remove the characteristics that put individual information at risk for prohibited disclosure. Although a published table may appear to show information about a specific individual, disclosure avoidance steps may disguise or suppress the accurate individual data, to protect privacy while ensuring that the results are still useful. The techniques used disclosure avoidance may vary, depending on the type of data.

Census may publicly release statistical products derived from SSA and Census linked data, resulting from authorized research and statistical projects under this MOU, without advance SSA review and approval, under the following disclosure avoidance conditions:

1. All statistical products must be approved through the Census Disclosure Review Board (DRB), subject to the standard disclosure avoidance and procedural requirements of that process, prior to public release.

2. Census DRB will use agreed upon rigorous and scientifically-sound disclosure avoidance processes and will follow the procedures and techniques described in the Statistical Policy Working Paper 22 (second version, 2005) Report on Statistical Disclosure Limitation Methodology, Federal Committee on Statistical Methodology available at https://www.hhs.gov/sites/default/files/spwp22.pdf.

   Noise infusion is Census's preferred disclosure avoidance technique. Census applies noise infusion to all data products that are reported with geographies smaller than a state. Census may require noise infusion for DRB microdata releases, depending on the characteristics of the microdata and the specific variables that are to be released.

3. Upon request and prior to substantive changes, Census must brief SSA on Census's DRB standard requirements and procedures and techniques used to conduct disclosure avoidance.

AMERICAN OVERSIGHT

4. Census will provide SSA with advance notice of any disclosure-proofed statistical products using the data covered by this MOU. The advance notice may be as short as twenty-four hours before public release, unless the parties have developed a standard reporting process to provide regular, advance notice of upcoming public releases under a different timeframe. SSA reserves the right to request a copy of the publication prior to release to account for disclosures of Numident data.

5. Census will provide SSA with written quarterly reports on all statistical products released by Census that included or were derived from Numident data. The report will include the project name and number, names of files containing Numident data used for the project, list of data products reviewed by the DRB, and date the DRB approved the products for publication.

6. If SSA identifies disclosure or privacy concerns with the release of SSA data in Census publications, Census will work with SSA to resolve those concerns (e.g., modifying the concerning portions of publications not yet released, removing concerning portions of already released publications from Census's website or other means of public distribution under Census control).

VII. Procedures for Retention and Destruction of Data

When Census has no further need of information SSA provided to it under this agreement or upon termination of this agreement, whichever occurs first, Census must return all SSA information to the SSA Data Custodian, or securely destroy such information. If Census destroys such information, then it must provide a letter within 15 days of the date of destruction to the SSA Data Custodian certifying that all SSA information has been destroyed.

If Census is required to retain the information in accordance with federal records retention requirements or other applicable law, Census must notify SSA of the retention requirements prior to expiration of this MOU and retain the information solely for this purpose.

Census is authorized to retain and continue to use statistical products approved for public release by SSA or the Census DRB under the disclosure avoidance conditions in this MOU.

VIII. Data Security and Safeguards

SSA and Census will comply with the requirements of the Federal Information Security Management Act (FISMA), 44 U.S.C. Chapter 35, Subchapter II, as amended by the Federal Information Security Modernization Act of 2014 (Pub. L. 113-283); related Office of Management and Budget (OMB) circulars and memoranda, such as Circular A-130, *Managing Information as a Strategic Resource* (July 28, 2016) and Memorandum M-17-12 *Preparing for and Responding to a Breach of Personally Identifiable Information* (January 3, 2017); National Institute of Standards and Technology (NIST) directives; and the Federal Acquisition Regulations, including any applicable amendments published after the effective date of this agreement. These laws, directives, and regulations include requirements for safeguarding Federal information systems and personally identifiable information (PII) used in Federal agency business processes, as well as related reporting requirements. Both agencies recognize, and will implement, the laws, regulations, NIST standards, and OMB directives including those published subsequent to the effective date of this agreement.

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000427

FISMA requirements apply to all Federal contractors, organizations, or entities that possess or use Federal information, or that operate, use, or have access to Federal information systems on behalf of an agency. Both agencies are responsible for oversight and compliance of their contractors and agents.

A. Reporting Loss or Theft of PII

If Census experiences a loss of PII obtained from SSA under the terms of this agreement, it will also follow the loss reporting guidelines issued by OMB. In the event of an incident involving the confirmed loss of PII, Census will follow its established procedures, including notification to the proper organizations (e.g., United States Computer Emergency Readiness Team, the agency's privacy office).

In addition, in the event of an actual or suspected breach involving the loss or potential loss of PII disclosed by SSA under this agreement, Census will immediately notify Census' Data Custodian named in this agreement and Census' Privacy Office to report the breach. Census will also immediately notify SSA's Data Custodian named in this agreement. If Census is unable to speak with the SSA's Data Custodian within one hour or if for some other reason notifying the SSA Data Custodian is not practicable (e.g., it is outside of the normal business hours), Census will call SSA's National Network Service Center toll free at 1-877-697-4889.

B. Breach Notification

Census will follow PII breach notification policies and related procedures issued by OMB. If Census experiences a breach and determines that the risk of harm requires notification to affected individuals or other remedies, Census will carry out these remedies without cost to SSA.

C. Administrative Safeguards

Census will restrict access to and use of all information obtained from SSA, and any records derived from SSA information, to only those authorized Census staff who need it in connection with the authorized research and statistical projects and activities under this MOU.

D. Cloud Storage

Census will adopt policies and procedures to ensure that the data provided by SSA under this agreement and any data derived from the SSA-provided data that is maintained in a Managed Service Provider or Cloud Service Provider is encrypted at rest and in transit. Census will also ensure that the data are accessed, transferred, stored, or processed within the jurisdiction of United States (i.e., within the continental United States, Hawaii, Alaska, Puerto Rico, Guam, American Samoa, the Northern Mariana Islands and the U.S. Virgin Islands). Census will ensure that policies and procedures protect the security and confidentiality of the information in accordance with Federal law. Only Census employees or individuals with 13 U.S.C. Section 23(c) special sworn status who have a need to know will have the ability to decrypt the data.

AMERICAN OVERSIGHT

E. Physical Safeguards

Census will store the data obtained under this agreement and any data derived therefrom that is not approved for public release in an area that is physically and technologically secure from access by unauthorized persons at all times (e.g., door locks, card keys, biometric identifiers, etc.). Only authorized Census staff will transport such data. Census will establish appropriate safeguards for such data, as determined by a risk-based assessment of the circumstances involved.

F. Technical Safeguards

Census will process the data obtained under this agreement and any data derived therefrom that is not approved for public release under the immediate supervision and control of authorized personnel in a manner that will protect the confidentiality of the data, so that unauthorized persons cannot retrieve any data by computer, remote terminal, or other means. Systems personnel must enter personal identification numbers when accessing data on the agency's systems. Census will strictly limit authorization to those electronic data areas necessary for the authorized staff to perform his or her official duties.

G. Application of Policy and Procedures

Census will adopt policies and procedures to ensure that it uses the information obtained under this agreement and any data derived therefrom that is not approved for public release solely as provided in this agreement. Census will comply with these guidelines and any subsequent revisions.

H. Security Assessments

The National Institute of Standards and Technology (NIST) Special Publication 800-37, as revised, encourages agencies to accept each other's security assessments in order to reuse information system resources and/or to accept each other's assessed security posture in order to share information. NIST 800-37 further encourages that this type of reciprocity is best achieved when agencies are transparent and make available sufficient evidence regarding the security state of an information system so that an authorizing official from another organization can use that evidence to make credible, risk-based decisions regarding the operation and use of that system or the information it processes, stores, or transmits. Consistent with that guidance, the parties agree to make available to each other upon request system security evidence for the purpose of making risk-based decisions. Requests for this information may be made by either party at any time throughout the duration or any extension of this agreement.

I. Disclosure

Census acknowledges that an unauthorized release or disclosure of information provided by SSA under this agreement may violate the terms of the Privacy Act and 42 U.S.C. § 1306 and subject the individual who disclosed the information to both criminal and civil sanctions. Census will inform all of its employees or agents granted access to this information that the release and disclosure of the information may subject the individual who released the information to civil and criminal penalties under 5 U.S.C. § 552a and other applicable laws.

AMERICAN OVERSIGHT

J. Use of Contractors

Census is authorized to use contractors to fulfill its obligations under this agreement. Prior to disclosing any information obtained from SSA or records derived from SSA information to its contractor(s), Census must:

i. Provide a list of Census current contractor(s) to SSA's Data Custodian. The list must contain: contractor name and address, description of the work that is performed with the information, and the location of where work is performed with the information.
ii. Obtain written agreement from its contractor(s) to abide by all applicable terms and conditions of this agreement, including but not limited to all terms related to retention and destruction, security and safeguards, and PII loss reporting.
iii. Provide SSA's Data Custodian with any updates to Census's contractor list within 48 hours of any change.

IX. Data Custodians

The Census Data Custodian for this agreement is Michael A. Berning, 301-763-2028. The Census Data Custodian is responsible for ensuring that Census observes all conditions of use set forth under this agreement and establishes and maintains security arrangements that will safeguard SSA information from loss and unauthorized use. Census will notify SSA within 15 days of any change in Data Custodian.

X. Contacts

SSA Agreement Project Officer
Sheron Matthews, Policy Analyst
ORDP, ODEPPIN, ODXIA, RAIAPB
Annex Building
6401 Security Boulevard
Baltimore, MD 21235
410-966-4750
Sheron.Matthews@ssa.gov

Census Bureau Agreement Project Officer
Michael A. Berning
Assistant Division Chief for Data Acquisition and Curation
Economic Reimbursable Surveys Division
U.S. Census Bureau
301-763-2028
Michael.A.Berning@census.gov

SSA Project Coordinator
Ericka Jackson
SSA DCS OEIS DEED EDPB
Operations Building
6401 Security Boulevard
Baltimore, MD 21235
(410) 966-4042
Ericka.Jackson@ssa.gov

Census Bureau Project Coordinator
Ashley Landreth, Policy Analyst
Administrative Records Coordination
Branch, Policy Coordination Office
Room HQ8H026A
4600 Silver Hill Road
Washington, DC 20233
(301) 763-8457
Ashley.denele.landreth@census.gov

AMERICAN OVERSIGHT

SSA Billing Contact
Michele Bailey
Office of Finance
Social Security Administration
P.O. Box 47
Baltimore, MD 21235-0047
(410) 965-0729
Michele.bailey@ssa.gov

Census Bureau Billing Contact
Robin G. Sommerville
Financial Services Branch
U.S. Census Bureau
4600 Silver Hill Road, Room 2K415
Suitland, MD 20746
(301) 763-9543
robin.g.sommerville@census.gov

XI. Funding

SSA will collect funds as set forth in the Form SSA-1235 executed between the parties at the beginning of each Fiscal Year (FY) from Census through the Intra-Governmental Payment and Collection (IPAC) system on a quarterly basis, sufficient to reimburse SSA for the costs it has incurred for performing services through the date of billing. A copy of the IPAC billing and all original supporting documentation shall be mailed to Darrell Blyden, Chief, Accounts Payable Branch, U.S. Census Bureau, 4600 Silver Hill Road, Washington, DC 20233 no later than five (5) calendar days following the processing of the IPAC transaction.

At least quarterly, but no later than 30 days after an accountable event, SSA shall provide Census with a performance report (e.g. a billing statement) that details all work performed to date. Additionally, at least quarterly, the parties will reconcile balances related to revenue and expenses for work performed under the agreement

XII. Duration or Period of Agreement

This MOU will become effective when signed by both parties, and terminates September 30, 2024. Performance will start no earlier than October 1, 2019 and extend through September 30, 2024.

However, this MOU does not authorize SSA to incur obligations through the performance of the services described herein. Performance of such services is authorized only by execution of Form SSA-1235. Moreover, SSA may incur obligations by performing services under a reimbursable agreement only on a fiscal year basis. As part of this Agreement, both parties will execute a Form SSA-1235 that provides the authorization for SSA to perform services under this Agreement in FY 2020. Prior to any performance by SSA of activities under this MOU, both parties will execute a new Form SSA-1235 for each FY that SSA will perform activities under this MOU. The Form SSA-1235 for each FY will identify reimbursable cost estimates for that fiscal year. SSA's ability to perform work for fiscal years beyond FY 2020 is subject to the availability of funds.

Notwithstanding the foregoing paragraphs, all provisions as to data security and safeguards shall remain in effect for all information SSA provides to Census under this agreement for as long as Census retains such information.

AMERICAN OVERSIGHT

XIII. Dispute Resolution

Disputes related to this MOA shall be resolved in accordance with instructions provided in the Treasury Financial Manual (TFM) Volume I, Part 2, Chapter 4700, Appendix 10, Intragovernmental Transaction Guide (July 2019).

XIV. Modification and Termination or Cancellation

Modifications to this agreement must be in writing and agreed to by the parties. This agreement may be terminated by either party upon 30 days' advance written notice. If Census cancels the order, SSA is authorized to collect costs incurred prior to cancellation of the order plus any termination costs.

XV. Integration Clause

This agreement and the accompanying Form SSA-1235 constitute the entire agreement of the parties with respect to its subject matter. There have been no representations, warranties or promises made outside of this agreement. This agreement shall take precedence over any other documents that may be in conflict with it.

XVI. Disclaimers

SSA is not liable for any damages or loss resulting from errors in information provided to Census under this MOU. Furthermore, SSA is not liable for damages or loss resulting from the destruction of any materials or data provided by Census. All information furnished to Census will be subject to the limitations and qualifications, if any, transmitted with such information. If, because of any such error, loss or destruction attributable to SSA, the services must be re-performed by SSA, the additional cost thereof will be treated as a part of the full costs incurred in compiling and furnishing such information and will be paid by Census.

The delivery by SSA of the goods and/or services described herein and the timeliness of said delivery are authorized only to the extent that they are consistent with proper performance of the official duties and obligations of SSA and the relative importance of this request to others. If for any reason SSA delays or fails to provide services, or discontinues the services or any part thereof, SSA is not liable for any damages or loss resulting from such delay or for any such failure or discontinuance.

Title to and ownership of any property purchased from funds transferred under this agreement will reside with SSA.

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000432

XVII. Authorization and Signatures

The signatories below warrant and represent that they have the competent authority on behalf of their respective agencies to enter into the obligations set forth in this Agreement. The signatories may sign this document electronically by using an approved electronic signature process. Each signatory electronically signing this document agrees that his/her electronic signature has the same legal validity and effect as his/her handwritten signature on the document, and that it has the same meaning as his/her handwritten signature.

Social Security Administration:

Katherine N. Bent RN, Ph.D.
Associate Commissioner Office of Research Demonstration, and Employment Support (ORDES)
Associate Commissioner (Acting) Office of Research, Evaluation and Statistics (ORES)
Social Security Administration
4700-C Meadows East Building
6300 Security Boulevard
Baltimore, MD 21235
Date: Sept. 25. 2019

U.S. Census Bureau:

Kevin Deardolf
Chief, Economic Reimbursable Surveys Division
Date: 09/27/19

Attachment A: Census Numident Projects
Attachment B: Numdident Record Layout

AMERICAN OVERSIGHT

AMERICAN OVERSIGHT

MEMORANDUM OF UNDERSTANDING

THROUGH WHICH

THE U.S. CENSUS BUREAU IS ACQUIRING

CALENDAR YEAR 2018-2022 SELECTIVE SERVICE REGISTRATION FILE

FROM

THE SELECTIVE SERVICE SYSTEM

Agreement No: 0094-FY17-NFE-0128.000

1. PARTIES AND PURPOSE

This Memorandum of Understanding (MOU) establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Selective Service System (SSS) for the acquisitions Calendar Year (CY) 2018-2022 Selective Service System Registration File for use in its intercensal estimates program, the Statistical Administrative Records System, and other activities that support the Census Bureau's decennial census and survey programs.

2. AUTHORITY

The authority for the Census Bureau and SSS to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

3. TERMS AND CONDITIONS

The information provided by SSS under this agreement is confidential under the Privacy Act of 1974, 5 U.S.C. § 552a, as amended. Title 13 U.S.C., Section 9, guarantees the continued confidentiality of data once acquired by the Census Bureau. The Census Bureau agrees that any information received under this agreement will remain confidential, that no data under this agreement will be disclosed in personally-identifiable form, and that all uses will be solely for statistical purposes.

Data transmitted to the Census Bureau will become a part of the Census Bureau's Statistical Administrative Records System (StARS) and is covered under the Census Bureau's System of Records Notice COMMERCE/CENSUS-8, StARS. As such, these records are subject to all requirements and conditions of the Privacy Act of 1974.

To the extent authorized by federal law: When the Census Bureau publicly releases information pursuant to this agreement, it shall not identify any individual or business entity and all results will have met the Census Bureau disclosure avoidance guidelines. Full Title 13 confidentiality is provided to protect the identities of individuals in all items derived from program data until the data are destroyed. The Census Bureau agrees to allow SSS the ability to verify that findings, listings, information derived, or any combination of data extracted or derived from the SSS program data properly protects the identities of individuals.

Both parties acknowledge that substantial penalties exist for wrongful disclosure of SSS information provided under this agreement:

A. Unauthorized disclosure of the information provided under this agreement may violate the terms of 13 U.S.C, Section 9; 5 U.S.C., Section 552a; and 44 U.S.C., Section 3501. In

AMERICAN OVERSIGHT

the event of inconsistency, the parties agree that the most restrictive provisions of these statutes will apply in determining what constitutes an unauthorized disclosure.

B. The penalties stipulated for wrongful disclosure in 13 U.S.C., Section 214; 5 U.S.C, Section 552a; and 44 U.S.C, section 3501 may include imprisonment for up to five years, a fine, or both.

C. Knowingly and willfully disclosing or obtaining records under false pretenses may also violate provisions of 5 U.S.C, Section 552a, resulting in penalty. Taking or converting records to one's own use or receiving the file(s) knowing they were stolen or converted may violate 18 U.S.C, Section 641, resulting in penalty.

By signing this agreement, the Census Bureau agrees to abide by all provisions set out in this agreement for protection of all information contained in the data files(s) and acknowledges having received notice of potential criminal, administrative, or civil penalties for violation of the applicable laws supporting the terms of the agreement.

Detailed file specifications and requirements of the Census Bureau's CY2018-2022 request for the SSS data are provided in Enclosure A. The Census Bureau will retain the original CY2018-2022 SSS data for two (2) years from the date of receipt. The Census Bureau will have unlimited use and ownership of the SSS data after it is commingled with Title 13 data.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all the designated provisions of this agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the agreement to prevent unauthorized use.

Processing Sites: Bowie Computer Center
Suitland Federal Center
Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the program agency and the Census Bureau, respectively.

The contacts of each party to this agreement are:

Agreement

Bernard Ben-Carew, Selective Service System
Data Management Center
2834 Green Bay Rd., Ste. 222
Great Lakes, IL 60088
847-688-7903 Phone
847-688-5953 Fax
Bernard.Ben-Carew@sss.gov Email

Michael A. Berning, Assistant Center Chief
U.S. Census Bureau
Center for Administrative Records Research and Applications
HQ-5K123
4600 Silver Hill Road
Suitland, MD 20746
301-763-2028 Phone
michael.a.berning@census.gov Email

AMERICAN OVERSIGHT

Technical

Daisy Santiago, Selective Service System
Data Management Center
2834 Green Bay Rd., Ste. 222
Great Lakes, IL 60088
847-688-7924 Phone
847-688-5953
daisy.santiago@sss.gov Email

Michael A. Berning, Assistant Center Chief
U.S. Census Bureau
Center for Administrative Records Research and Applications
HQ-5K123
4600 Silver Hill Road
Suitland, MD 20746
301-763-2028 Phone
michael.a.berning@census.gov Email

Sponsor

Amy OHara, Chief
Center for Administrative Records Research and Applications
U.S. Census Bureau
HQ 5K124
4600 Silver Hill Road
Suitland, MD 20746
301-763-5757 Phone
amy.b.ohara@census.gov Email

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, and MODIFICATIONS

This agreement will become effective when signed by all parties. The agreement will terminate on September 30, 2022 but may be amended at any time by mutual consent of the parties. The parties will review this agreement at least once every three years to determine whether it should be revised, renewed, or canceled.

Any party may terminate this agreement by providing 30 days' written notice to the other party. If the agreement is terminated, neither party shall be responsible for any costs incurred by the other party prior to the termination.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

7. CONFIDENTIALITY

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence and to use the data for statistical purposes only in accordance with the provisions of Title 13, United States Code. Per the Federal Cybersecurity

AMERICAN OVERSIGHT

Enhancement Act of 2015, these data are protected from cybersecurity risks using both commercial and government tools and processes. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with the National Institute of Standards and Technology (NIST) Federal Information Processing Standards (FIPS) 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "Recommended Security Controls for Federal Information Systems and Organizations," as well as Special Publication 800-37r1 "Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO as well as the Department of Commerce Office of Inspector General as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "Standards for Security Categorization of Federal Information and Information Systems" and NIST Special Publication 800-60r1 "Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices." Security controls and subsequent assessments are done based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are reported within one hour to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau becomes aware of a known breach of SSS data, the Census Bureau will contact the identified SSS contacts to discuss the actions and potential remedies in regards to the incident. Census can only agree to confidentiality/disclosure provisions to the "extent permitted by law.

8. APPROVALS

for JE

John L. Eltinge
Assistant Director for Research and Methodology
U.S. Census Bureau

6/22/2017
(Date)

Adam Copp
Acting Deputy Director
Selective Service System

7/24/2017
(Date)

AMERICAN OVERSIGHT

Enclosure A: Specifications for the Selective Service System (SSS) Registration File

Geography:	National File
Reference Period:	All files cut as close to: April 1, 2018 April 1, 2019 April 1, 2020 April 1, 2021 April 1, 2022
Delivery Date:	May 30, 2018 May 30, 2019 May 30, 2020 May 30, 2021 May 30, 2022
Universe:	Ages 18 – 25
Data Sort:	Sort by most current ZIP Code
Data Variables:	• Name – First, Middle, Last, Suffix (e.g., Jr., Sr., if applicable) • Social Security Number (SSN) • Date of Birth – Month, Day, Year (mm/dd/yyyy) • Sex • Current Address – Street Number, Street Name, Street Type, Direction, Unit Number, or P.O. Box Number, Rural Route Number, City, State, ZIP Code • Address Flag – Indicates the address is a military or foreign address • Death Flag – By Source of Indicator • Date the record was last updated
Special Instructions:	Please specify if Social Security Numbers were validated and describe validation process in accompanying documentation.
Transfer Media:	CD-ROM (encrypted) (Please e-mail Census Bureau Technical Contact Person with password)
Format:	ASCII
Documentation:	1. Record Layout 2. Record Count on CD-ROM 3. Latest Data Dictionary
Delivery Method:	Traceable Delivery Service (Federal Express, UPS)
Mark Shipment:	CD-ROM – DO NOT X-RAY Please e-mail at the time of shipment.
Mailing Address for Shipments:	Mr. Michael Berning, Assistant Center Chief Center for Administrative Records Research and Applications U.S. Census Bureau CES HQ-5K123 4600 Silver Hill Road Suitland, MD 20746 michael.a.berning@census.gov

AMERICAN OVERSIGHT

Attachment B: Description of Approved Research Projects

1. Research and Planning for the 2020 Census

The Census Bureau is researching and developing innovative and efficient methods to increase the response rates and decrease the door-to-door interviews without sacrificing the accuracy of the census counts. To address the challenge of enumerating hard-to-enumerate populations, the Census Bureau is acquiring, processing, and analyzing administrative data files and third party data with alternate contact information (e.g., telephone number, e-mail address) from various sources.
The Census Bureau intends to test and potentially use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau intends to use program information, along with data from federal, state, and private sources to pursue the following four research initiatives, leading to improvements in quality and efficiency of 2020 Census operations:

A. validating and enhancing the Master Address File (MAF);[1]
B. designing and assigning resources to carry out the 2020 Census;[2]
C. unduplicating public, private, and census lists; and
D. imputing missing data.[3]

Data quality will be explored using 2010 decennial census data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census to assess accuracy based on the level of aggregation.

2. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes.

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections. The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

---

[1] Examples of possible Census Bureau uses include updating and evaluating the Master Address File.
[2] Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self response probabilities, simulating non response follow-up designs, directed advertising campaigns, and special enumeration operations planning.
[3] Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

AMERICAN OVERSIGHT

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU ACQUIRES
U.S. PASSPORT DATA
FROM THE U.S. DEPARTMENT OF STATE, BUREAU OF CONSULAR AFFAIRS
Agreement No. 2064-FY20-NFE-0324

1. PARTIES AND PURPOSE

This Memorandum of Understanding ("MOU" or "this agreement") establishes an agreement between the U.S. Census Bureau ("Census Bureau"), which is a component of the U.S. Department of Commerce, and the U.S. Department of State, Bureau of Consular Affairs (hereinafter "CA") for the acquisition of U.S. passport data per the July 11, 2019, Executive Order (EO) 13880: Collecting Information about Citizenship Status in Connection with the Decennial Census.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement for the purposes of supporting all projects listed in Attachment A, is 13 U.S.C. § 6(a), which permits the Census Bureau to call upon other Federal Government entities for information pertinent to the work provided for in Title 13 of the U.S. Code. The authorities for the Census Bureau to undertake the projects listed in Attachment A are 13 U.S.C. §§ 141, 181, 182, and 193.

The authority for CA to share data and enter into this agreement is 5 U.S.C. § 552a(b)(4) ("the Census exception"), which authorizes disclosure of Privacy Act-protected records to the Census Bureau "for purposes of planning or carrying out a census or survey or related activity pursuant to the provisions of Title 13." CA enters into this agreement in response to the Census Bureau's call under 13 U.S.C. § 6(a) for information pertinent to the work provided for in Title 13 of the U.S. Code as well as Executive Order 13880, 84 Fed. Reg. 33,831 (Jul. 11, 2019), which calls for "all agencies to share information requested by the Department [of Commerce] to the maximum extent permissible under law."

3. TERMS AND CONDITIONS

Pursuant to this agreement, CA will provide an extract of all available specified digital U.S. passport data to the Census Bureau for the sole purpose of supporting the projects listed in Attachment A. CA began

AMERICAN OVERSIGHT

digitizing U.S. passport record data in 1978. CA is unable to provide digital U.S. passport information before 1978 and some digital records provided by CA, particularly older records, may be incomplete. All data that CA agrees to provide to the Census Bureau remains sensitive and confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 (including 13 U.S.C. § 9), and the Privacy Act, 5 U.S.C. § 552a, *et seq*. To the extent provided by law, only Census Bureau staff and those Special Sworn Status ("SSS") researchers participating in the projects listed in Attachment A will have access to the data. Access shall be limited to the minimum number of individuals necessary.

The Census Bureau represents and warrants further that the Census Bureau shall not disclose, release, reveal, show, sell, rent, lease, loan, or otherwise grant access to the original data covered by this Agreement to any unauthorized person or entity. Any data, records, or other information shared between the agreed parties through this agreement are protected from unauthorized disclosure and shall be used solely for the Census Bureau's statistical purposes and not for program or administrative enforcement, including immigration enforcement, either by the Census Bureau or any other government entity, consistent with 13 U.S.C. 6, and E.O. 13880...

When the Census Bureau releases information related to these data, it may not be disclosed in an individually identifiable form that permits the identification of any individual respondents, businesses, organizations, or institutions, and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link U.S. passport data to census data, survey data, and administrative records data. To the extent provided by law, the Census Bureau will recognize CA as the owner of the original data in the form that it is delivered to the Census Bureau, prior to its integration with confidential Census data.

As described in Attachment A, the Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the data to measure the citizen voting age population by race and ethnicity at the block level . As noted in Section 3, the Census Bureau will ensure that original U.S. passport data is available only to Census Bureau staff and those Special Sworn Status ("SSS") researchers participating in the projects listed in Attachment A and not directly provided to external researchers and that Social Security Numbers (SSN) are replaced with a protected, unique Identification Key prior to making linked data available to Census Bureau researchers and statisticians.

AMERICAN OVERSIGHT

A. CA agrees:

i. To transfer to the Census Bureau, via a secure and encrypted Department of State-approved medium, all available specified data elements from U.S. passport data from January 1, 1978, to September 30, 2019, as described in section 8 of this MOU and the Statement of Work in Attachment B as soon as possible after signing this MOU but no later than March 31, 2020. A second transfer with all available specified data elements from U.S. passport data from October 1, 2019, to March 31, 2020, will occur as soon as possible but no later than July 31, 2020. A final transfer of all available specified data elements from U.S. passport data from April 1, 2020, to July 31, 2020, will be completed by September 30, 2020. Approved transfer mediums may include use of an encrypted, external hard drive mounted via Universal Serial Bus (USB).

ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, record length, and data dictionary.

iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the U.S. passport data.

iv. To allow the Census Bureau staff and SSS researchers to use U.S. passport data for the projects authorized under Title 13 listed in Attachment A and for additional projects authorized under Title 13 if approved in writing by both parties.

B. The Census Bureau agrees:

i. To permit access to the administrative data transmitted by CA only to the Census Bureau staff and SSS researchers for the specific projects authorized under Title 13 listed in Attachment A or those approved in writing by both parties.

ii. To notify CA staff when the transfer of the data is completed successfully or whether transfer is not completely successful.

iii. To return any Department of State-provided external media back to the CA within 10 business days of delivery.

AMERICAN OVERSIGHT

iv. To ensure data transmission and storage is conducted in accordance with the provisions of Office of Management and Budget (OMB) Memorandum 06-16.

v. To immediately notify CA of any discovery of unauthorized use of or access to U.S. passport data.

vi. To use such U.S. passport data solely for the purpose of supporting the projects listed in Attachment A.

4. CONTACTS

The parties mutually agree that the following named individuals will be designated as points of contact for this agreement on behalf of CA and the Census Bureau, respectively:

CA POC:
Barry J. Conway
Managing Director for Support Operations
Passport Services
Bureau of Consular Affairs
U.S. Department of State
(202) 485-6372
ConwayBJ@state.gov

Census Bureau POC:
Michael A. Berning
Assistant Division Chief
Economic Reimbursable Surveys Division
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-2028
Michael.A.Berning@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change within fifteen (15) days.

The parties mutually agree that the following named individual is designated as "Custodian" of the files on behalf of the Census Bureau and will be personally responsible for the observance of all conditions of use and for establishment and maintenance of security arrangements as specified in this agreement to prevent unauthorized activity and use. The Census Bureau agrees to notify CA within fifteen (15) days of any changes of custodianship.

AMERICAN OVERSIGHT

The parties mutually agree that CA may disapprove the appointment of a custodian or may require the appointment of a new custodian at any time.

Custodian: Lori A. Fox
Chief, Information Owner Staff
Economic Reimbursable Surveys Division
U.S. Census Bureau
4600 Silver Hill Road
Washington, DC 20233
(301) 763-3404
Lori.Anne.Fox@census.gov

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective as of the date on which it is signed by both parties. This agreement shall terminate three (3) years following the date on which it becomes effective. If, at the end of three (3) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this agreement at least once every three (3) years, or whenever a Federal statute is enacted or a court decision is issued that materially affects the substance and/or underlying legal authority of this agreement, in order to determine whether it should be revised, renewed, or canceled. The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and Passport Services' Managing Director for Support Operations or designate.

Notwithstanding all other provisions of this agreement, the parties agree that:

A. This agreement may be amended at any time by written mutual consent of both parties.

B. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the

AMERICAN OVERSIGHT

parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

7. DATA GOVERNANCE

At the time of signing, the Census Bureau will have in place the following data security and information assurance standards, and appropriate safeguards and procedures designed to protect against unauthorized activity, use, and disclosure of information obtained under the terms of this agreement.

A. Data Security and Information Assurance Standards:

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence and to use the data for statistical purposes only in accordance with the provisions of Title 13 of the U.S. Code. Per the Federal Cybersecurity Enhancement Act of 2015, these data are protected from cybersecurity risks through screening of the systems that transmit the data. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with the National Institute of Standards and Technology (NIST) Federal Information Processing Standards (FIPS) 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (Pub. L. 107-347, 116 Stat. 2899 (2002)). All systems are fully assessed against NIST Special Publication 800-53r4, "Recommended Security Controls for Federal Information Systems and Organizations," as well as Special Publication 800-37r1, "Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach." The Census Bureau Information Technology Security Program is reviewed annually by the Department of Commerce Office of the Chief Information Officer (CIO), as well as the Department of Commerce Office of Inspector General as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199, "Standards for Security Categorization of Federal Information and Information Systems," and NIST Special Publication 800-60r1, "Guide for Mapping Types of Information and Information Systems to Security Categories: (2

AMERICAN OVERSIGHT

Volumes) - Volume 1: Guide Volume 2: Appendices." Security controls and subsequent assessments are done based on the final categorization.

Cloud providers must be approved for at least moderate level information through the GSA Federal Risk and Authorization Management Program (FedRAMP) process prior to acquiring any services. The Census Bureau identifies, assesses and authorizes use based on the published FedRAMP results and an assessment of any Census Bureau (customer provided) controls implemented to protect the infrastructure and data. Security reporting on cloud providers is reported to the Department of Commerce on a regular basis under the Federal Information Security Management Act (FISMA) of 2014.

B. Safeguards:

i. Prevention of Misuse

The Census Bureau hereby agrees to take appropriate action to penalize misuse, alteration, deletion or any other unauthorized access of U.S. passport data by Census Bureau personnel under the Foreign Affairs Manual and applicable civil and criminal laws and assure compliance with the protections provided by the Privacy Act.

ii. Access Authorization and Controls

a. Access Authorization

i. CA and the Census Bureau will provide points of contact and will inform each other of the name and title of their respective Program Administrators, as outlined in Section 4.

ii. The Census Bureau will be responsible to prevent and/or detect unauthorized access to, or use of, the information contained in U.S. passport data by Census Bureau personnel and SSS researchers.

b. Access Controls

i. The Census Bureau will restrict access to all U.S. passport data to the minimum number of individuals necessary. Those individuals granted access will have received the appropriate clearances required for all government (including detailees) and contractor personnel accessing Census Bureau data and

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000447

systems.

ii. The Census Bureau is responsible for the set up and maintenance of user accounts, regarding access to the data referenced in Section 3, subject to consultation with CA on requirements. Census Bureau personnel shall securely log onto the Census Bureau network prior to accessing the data described in Section 3.

iii. Unauthorized Activity

a. The Census Bureau and CA acknowledge that the term "unauthorized activity" includes, but is not limited to, unauthorized or accidental access, use, dissemination, disclosure, storage, or disposal of U.S. passport data.

b. The Census Bureau acknowledges that it will be responsible for preventing, detecting, reporting, and responding to unauthorized activity by Census Bureau personnel, including employees, contractors, and detailees from third party agencies, in accordance with the Privacy Act, other applicable federal guidance, and this MOU.

c. The Census Bureau will promptly take appropriate disciplinary or remedial action and immediately notify CA when it learns that unauthorized activity has occurred.

d. The Census Bureau maintains a policy regarding the reporting of and response to losses of protected data in accordance with OMB Memorandum M-17-12. Known or suspected losses of protected data must be reported within one (1) hour to the United States Computer Emergency Readiness Team (US CERT).

e. The Census Bureau acknowledges its requirement to report any suspected or confirmed data breach involving CA's data to Diplomatic Security's Computer Incident Response Team (DS CIRT) at CIRT@state.gov within one (1) hour of the detection of the breach. The Census Bureau shall also provide such information immediately or not more than 24 hours to the Bureau of Consular Affairs, Fraud Prevention Programs, Consular Integrity Division (CA/FPP/CID) at ConsularIntegrity@state.gov and Passport Services, Office of Integrity and Internal Controls (CA/PPT/S/IIC) at AskPPTInternalControls@state.gov.

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000448

f. The Census Bureau undertakes to assist CA with investigation of potential unauthorized activity by Census Bureau personnel related to U.S. passport data.

g. The Census Bureau will report to CA the final outcome of any investigation of a breach or improper disclosure of U.S. passport data by Census Bureau personnel, including disciplinary action taken against Census Bureau users who commit unauthorized activity or misuse of U.S. passport data in another manner.

iv. Periodic Internal Inspections

CA will conduct periodic safeguard reviews of Census Bureau's systems to assess whether security and confidentiality of U.S. passport data is maintained in accordance with the Privacy Act of 1974, CA policies, and the safeguarding protocols and requirements outlined in the terms of this agreement.

Periodic safeguard reviews will include:

a. The assessment of the Census Bureau's location and other locations only by mutual agreement;

b. The testing of controls for computer systems storing, processing, or transmitting U.S. passport data;

c. A review of the Census Bureau's recordkeeping, policies, and interviews of Census Bureau employees and SSS researchers to verify the use of Personally Identifiable Information (PII) and assess the adequacy of procedures established to protect U.S. passport data.

All on-site safeguard assessments will be collaborative efforts between CA and the Census Bureau to ensure compliance with this agreement and all relevant laws, regulations, and policies. Census Bureau will support timely mitigation of identified risks and/or vulnerabilities.

8. DATA TRANSMISSION, STORAGE, AND RETENTION

A. Data Transmission

In transmitting data under this MOU, the Census Bureau and CA will utilize mutually acceptable technical specifications and security protocols

AMERICAN OVERSIGHT

as agreed by technical representatives of the Census Bureau and CA.

i. Method of Transmission

CA shall provide data to the Census Bureau through a Department of State-approved mechanism. This may include use of secure and encrypted Department of State-approved external USB Hard Drive.

ii. Specified Data Elements

CA will initially transfer all available specified data elements of U.S. passport records from January 1, 1978, to September 30, 2019, by March 31, 2020. A second transfer with all available specified data elements of U.S. passport records from October 1, 2019, to March 31, 2020, will be completed by July 31, 2020. A final transfer of all available specified data from April 1, 2020, to July 31, 2020, will be completed by September 30, 2020.

All specified data elements provided by CA are protected by Title 13 (including 13 U.S.C. § 9), the Privacy Act, 5 U.S.C. § 552a, *et seq.*, and as outlined in this agreement, to include:

1. First name
2. Last name
3. Middle name
4. Aliases
5. Passport number
6. Passport type(s)
7. Date of birth
8. Sex
9. Mailing address
10. SSN
11. Place of birth
12. Country of birth
13. Issuance date; and
14. Expiration date.

B. Records Storage

The storage of U.S. passport data will be conducted in accordance with the provisions of OMB Memorandum 06-16, CA policies, the safeguarding protocols described in Passport Records' SORN, State-26, and the requirements outlined in the terms of this agreement. This

AMERICAN OVERSIGHT

shall include encryption of data at rest for any originally provided or linked data sets that include PII provided by CA.

C. Records Retention

To the extent permitted by law, all original source data received by the Census Bureau from CA will be destroyed two (2) years after receipt. CA data integrated into Census Bureau systems to support the projects listed in Attachment A will become Census Bureau records and retained indefinitely. The Census Bureau shall provide proof of data destruction upon the completion of the data retention timeframe.

Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original U.S. passport data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law. This complies with the Census Bureau's record retention schedule that states that the retention period for original files from outside sources will be destroyed when two (2) years old or as contract specifies. The Census Bureau agrees to notify CA within thirty (30) days of the completion of research if the purpose is completed before this aforementioned retention period. Upon such notice or at the end of the above-mentioned retention date, whichever occurs sooner, the Census Bureau will destroy such data or, if the retention schedule changes for any reason, the Census Bureau will notify CA. The Census Bureau acknowledges that stringent adherence to the aforementioned retention period is required and that the Census Bureau shall ask CA for instructions under this paragraph if instructions have not been received within thirty (30) days after the retention period ends. When the Census Bureau destroys the data, the Census Bureau agrees to certify the destruction of the files in writing within thirty (30) days of receiving CA instructions. A statement certifying this action must be sent to CA. The Census Bureau agrees that no data from U.S. passport records, or any parts thereof, shall be retained when the aforementioned files are destroyed unless authorization in writing for the retention of such files has been received from the point of contact as identified in Section 4 of this agreement.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from U.S. passport data will be restricted to the projects defined in Attachment A to the agreement and will not be discontinued due to the expiration or termination of

AMERICAN OVERSIGHT

this agreement. Furthermore, the use of records with linkage identifiers and U.S. passport data linked to other data as part of the projects described in Attachment A will not be discontinued due to expiration of this agreement but will be limited to the authorized uses defined in Attachment A, as long as those uses remain legally valid as provided in Section 5 of this agreement.

To promote organizational transparency, and in support of data discovery for current and future research projects, the Census Bureau posts non-sensitive, non-personally identifiable data documentation to public-facing websites. This documentation, such as a record layout or data dictionary, can include file descriptions, variable lists, variable labels, and valid values for each variable.

9. NO THIRD-PARTY RIGHTS OR BENEFITS

This MOU is not intended and should not be construed to create any right or benefit, substantive or procedural, enforceable at law or otherwise by any third party against the participants, their parent agencies, the United States, or the officers, employees, agents or other associated personnel thereof. The parties will seek to resolve any disputes regarding this agreement by mutual consultation.

10. FUNDING

This agreement does not obligate funds of either party to this agreement. Each party will assume its own costs, and if funding transfers are required, they will be executed through written amendment to this agreement.

11. INTERPRETATION AND SEVERABILITY

Nothing in this MOU is intended to conflict with current law or regulation. If a term of this agreement is inconsistent with such authority, then that term shall be invalid to the extent of the inconsistency, but the remaining terms and conditions of this MOU shall remain in full force and effect.

12. ENTRY INTO FORCE

This MOU, which consists of twelve (12) numbered Sections, will commence when signed by both parties.

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000452

APPROVALS

On behalf of the Census Bureau, the undersigned individual hereby attests that he or she is authorized to enter into this Agreement and agrees to all the terms specified herein.

K Deardorff 11/13/2020

Kevin Deardorff (Date)

Chief, Economic Reimbursable Surveys Division
U.S. Census Bureau

AMERICAN OVERSIGHT

On behalf of CA, the undersigned individual hereby attests that he or she is authorized to enter into this Agreement and agrees to all the terms specified herein.

1 | 3 | 2020

Carl C. Risch (Date)

Assistant Secretary
Bureau of Consular Affairs
U.S. Department of State

AMERICAN OVERSIGHT

Attachment A: Description of Approved Research Projects

1. Evaluation and Improvement of Citizenship Information in Demographic Surveys and Censuses

Under the authority of 13 U.S.C. §§ 6(a), 141, 181, 182, 193, and Executive Order 13880, the Census Bureau is developing the capability to measure the citizen voting age population by race and ethnicity at the block level via linking citizenship information from administrative records to Census microdata files. The Census Bureau hosts Social Security Administration (SSA) Numident and Internal Revenue Service (IRS) Individual Tax Payer Identification Number (ITIN) files containing citizenship information that could potentially be used for this purpose. It is unknown how quickly the SSA Numident is updated when persons are naturalized, however. The Census Bureau would like to investigate the timeliness of the Numident and IRS data by comparing them to other sources covering naturalized U.S. citizens and noncitizen U.S. residents. These other sources can also fill coverage gaps in the SSA (which does not contain citizenship status for those individuals applying for an SSN prior to 1972) and IRS data (which does not contain citizenship status information for noncitizens who do not need to file an IRS tax return). The Census Bureau will conduct research and evaluations of data quality of our own household survey responses to the citizenship question with naturalization and noncitizen resident administrative records. We will also conduct research that informs the Census Bureau's understanding of the relationship between citizenship and other core demographic and socioeconomic aspects of migration, labor markets, and household wellbeing using the enhanced citizenship categorizations developed under this project.

2. Research, Testing and Operations for the 2020 Census

Under the authority of 13 U.S.C. §§ 6(a), 141, 181, 182, 193, the Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

A. validating and enhancing the Master Address File (MAF);[1]

1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.

AMERICAN OVERSIGHT

B. designing and assigning resources to carry out the 2020 Census;[2]
C. unduplicating public, private, and census lists; and
D. inputting missing data.[3]

To determine the feasibility of incorporating the administrative records data into Census Bureau operations, the data will be explored using 2010 decennial census data, intercensal test data, and other Census Bureau household survey data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census, intercensal test data, and other Census Bureau household survey data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data, operational site test data, and other Census Bureau household survey data with the end goal of eventually incorporating the data into decennial census operations.

2 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.
3 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

AMERICAN OVERSIGHT

Attachment B: Administrative Records Requirements for U.S. Passport Data

The Census Bureau seeks coverage of U.S. passport data starting as early January 1, 1978, and extending through March 31, 2020 (as well as refreshes through July 31, 2020). Census Bureau understands and expects that receiving both applications and approvals as of a cut date may result in an application only as approval status may be pending as of the cut date.

Reference Period:	All records available before: July 31, 2020
Delivery Dates:	March 31, 2020 July 31, 2020 September 30, 2020
Data Variables:	First name Last name Middle name Aliases Passport number Passport type Date of birth Sex Mailing address SSN Place of birth Country of birth Issuance date, and Expiration date
Special Instructions:	Please make sure that the data and variable names/codes are consistent from year to year.
Transfer Media:	To be determined.
Format:	ASCII
Documentation:	1. Please include the latest codebook (digital preferred), record layout, record count, and the name and telephone number of a technical advisor, if we should have questions. 2. Include responses required in special instructions.
Delivery Method:	To be determined
Mark Shipment:	**U.S. State Department – Passport Files**
Mailing Address for Shipments:	Please e-mail Michael.A.Berning@census.gov at the time

SENSITIVE BUT UNCLASSIFIED

AMERICAN OVERSIGHT

	of shipment.
Census Bureau Technical Contact Person:	Dave Sheppard Branch Chief, Data Quality Branch Economic Reimbursable Surveys Division US Census Bureau Office 301-763-9291 Room 5K133 David.W.Sheppard@census.gov
Consular Affairs Technical Contact Person:	Priya Livingstone Acting Branch Chief, Mission Production Services Branch, Production Service Design and Development Division Department of State, Bureau of Consular Affairs Office 202-485-7284 LivingstonePD@state.gov

AMERICAN OVERSIGHT

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
PRISONER DATA
FROM THE FEDERAL BUREAU OF PRISONS

Agreement No. 2064-FY20-NFE-0313.000

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Federal Bureau of Prisons (BOP) for the acquisition of prisoner data in support of Executive Order 13880 - Collecting Information about Citizenship Status in Connection with the Decennial Census. Census Bureau is working with Federal Agencies to obtain data to make estimates of the non-citizen population of the United States, including the non-citizen voting age population of the United States. This agreement addresses data BOP would provide to the Census Bureau for those purposes.

2. AUTHORITY

The authority for the Census Bureau and the BOP to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The BOP is authorized to enter into this MOU pursuant to the Omnibus Crime Control and Safe Street Act of 1968, as amended, 34 U.S.C. § 10132, which allows BOP to enter into agreements with other public agencies for the purpose of data collection and analysis.

3. TERMS AND CONDITIONS

Pursuant to this agreement, BOP, hereinafter referred to as "the program agency," will transfer prisoner records to the Census Bureau. All data that the program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and those Special Sworn Status ("SSS") researchers participating in the project will have access to the data. Access shall be limited to the minimum number of individuals necessary. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it may not be disclosed in individually-identifiable form that permits the identification of any individual respondents,

AMERICAN OVERSIGHT

businesses, organizations, or institutions, and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the prisoner data to census data, survey data and administrative records data. To the extent provided by law, the Census Bureau will recognize the program agency as the owner of the original data in the form that it is delivered to the Census Bureau, prior to its integration with confidential Census data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the prisoner data to provide new and improved estimates of population characteristics related to prisoners.

a. The program agency agrees:

   i. To transfer to the Census Bureau via secure method such as Secure File Transfer Protocol (SFTP) or appropriately encrypted, FIPS 140-2 compliant CD-ROM or DVD-ROM, two sets of administrative data on prisoners held, as described in Attachment A:
      - Records of inmates held by BOP up to September 28, 2019. These records will be transferred as soon as possible after signing of the MOU, but no later than December 31, 2019.
      - Records of inmates held by BOP from September 29, 2019 to April 1, 2020. These records will be transferred to the Census Bureau as soon as possible, but no later than July 31, 2020.

   ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, record length and data dictionary.

   iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the program agency data. Record linkage identifiers may not contain any prisoner data or direct identifiers.

   iv. To allow the Census Bureau staff and SSS researchers to use the prisoner data for the project listed in Attachment B or those approved in writing by both parties.

b. The Census Bureau agrees:

   i. To the extent provided by law, to grant access to the prisoner data only to Census Bureau staff and SSS researchers only for the project listed in Attachment B or those approved in writing by both parties.

AMERICAN OVERSIGHT

4. CONTACTS

The parties mutually agree the Census Bureau will appoint a designated "Custodian" of the files who will, in a representative capacity, comply with all of the designated provisions of this agreement on behalf of the Census Bureau. This includes observance of all conditions of use and the establishment and maintenance of security arrangements, as specified in the agreement to prevent unauthorized use. The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the program agency and the Census Bureau, respectively:

BOP PRIMARY POC

Neal Langan
Senior Social Science Research Analyst
Office of Research and Evaluation
400 First Street, N.W.
Washington, D.C. 20524
202-305-4122
NLangan@bop.gov

BOP ALTERNATE POC

Miles D. Harer
Director, Office of Research and Evaluation
202-514-9654
MHarer@bop.gov

Census Bureau POC:

Michael Berning
Assistant Division Chief
Economic Reimbursable Surveys Division (ERD)
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
301 763-2028
michael.a.berning@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, MODIFICATIONS AND TERMINATION

This agreement shall become effective upon the date of the last signature of the authorized officials for both parties. The agreement shall terminate three (3) years following the date on which it becomes effective. If, at the end of this period, the parties wish to continue the relationship, they must execute a new agreement.

Notwithstanding all other provisions of this agreement, the Parties agree that:

AMERICAN OVERSIGHT

a. This agreement may be modified at any time by written mutual consent of both parties.

b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

6. DATA RETENTION

The original data received from BOP will be retained by the Census Bureau for a maximum of two (2) years, after which Census will expunge the original data from its systems, so long as expungement is not inconsistent with Federal law. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the program agency data will not be discontinued due to the expiration or termination of this agreement. Regardless of this expiration, the use of records with linkage identifiers and prisoner data linked to other data as part of the project described in Attachment B will not be discontinued due to expiration or termination of this agreement.

To promote organizational transparency, and in support of data discovery for current and future research projects, the U.S. Census Bureau posts non-sensitive data documentation to public-facing websites. This documentation, such as a record layout or data dictionary, can include file descriptions, variable lists, variable labels and valid values for each variable. The Census Bureau agrees not to disclose the record layout, variable lists, or variable labels for BOP datasets.

7. RESOLUTION OF DISAGREEMENTS / CLAIMS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

8. CONFIDENTIALITY

A. IT Security Language

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence and to use the data for statistical purposes only in accordance with the provisions of Title 13, United States Code. Upon receipt, all data acquired because of this agreement will be treated, at a minimum, at the appropriate risk level in accordance with the National Institute of Standards and Technology (NIST) Federal Information Processing Standards (FIPS) 200 and Special Publication 800-60r1.

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000462

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53 Rev.4 "Recommended Security Controls for Federal Information Systems and Organizations," as well as Special Publication 800-37 Rev.1 "Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO as well as the Department of Commerce Office of Inspector General as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "Standards for Security Categorization of Federal Information and Information Systems" and NIST Special Publication 800-60 Rev.1 "Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices." Security controls and subsequent assessments are done based on the final categorization.

Cloud providers must be approved for at least moderate level information through the GSA Fed RAMP process prior to acquiring any services. Census Bureau identifies, assesses and authorizes use based on the published Fed RAMP results and an assessment of any Census Bureau (customer provided) controls implemented to protect the infrastructure and data. Security reporting on cloud providers is reported to the Department of Commerce on a regular basis under FISMA.

The Census Bureau maintains a policy regarding the reporting of and response to losses of protected data in accordance with OMB Memorandum M-17-12. Known or suspected losses of protected data must be reported within one hour of its discovery to the Bureau of the Census Computer Incident Response Team (BOC CIRT) who will report as required to the United States Computer Emergency Readiness Team (US CERT).

With respect to the data provided pursuant to this agreement, Census Bureau will immediately (or no later than within one hour of discovery) notify the BOP (202-514-2i049 Ext. 5 or 202-307-6667) in the event of any actual or suspected breach of such data (i.e., loss of control, compromise, unauthorized disclosure, access for an unauthorized purpose, or other unauthorized access, whether physical or electronic). If the data breach occurs outside of regular business hours and neither the BOP Chief Information Officer (CIO) nor the Chief Information Security Officer (CISO) can be reached, Census will call the DOJ Computer Emergency Readiness Team (DOJCERT) at 1-866-US4-CERT (1-866-874 -2378) within one hour of discovery of the breach.

B. Disclosure Language

Title 13, Section 9 of the United States Code (U.S.C.) requires the Census Bureau to keep confidential and the information collected from the public under the authority of Title 13. Section 214 of Title 13, U.S.C., and Sections 3551, 3559 and 3571 of Title 18, U.S.C., provide for the imposition of penalties of up to five years in prison and/or up to $250,000.00 in fines for wrongful disclosure of confidential census information.

AMERICAN OVERSIGHT

Disclosure avoidance is the process for protecting the confidentiality of data, as required under Title 13 U.S.C. A disclosure of data occurs when someone can use published statistical information to identify and individual who has provided confidential information under a pledge of confidentiality. For data tabulations, the Census Bureau uses disclosure avoidance procedures to modify or remove the characteristics that put confidential information at risk for disclosure. Although a published table may appear to show information about a specific individual, the Census Bureau has taken steps to disguise or suppress the original data, while making sure the results are still useful. The techniques used by the Census Bureau to protect confidentiality in tabulations vary, depending on the type of data.

Noise injection is the Census Bureau's preferred disclosure avoidance technique. By policy, noise injection is to be applied to all data products that are reported with geographies smaller than a state. In cases when it is not feasible to fully implement noise injection within the period of the contract, a transition plan for implementing noise injection or other provable privacy methods must be developed in coordination with the Census Bureau. Noise injection may be required for microdata releases, depending on the characteristics of the microdata and the specific variables that are to be released. Data that cannot be publicly released may still be analyzed within the Federal Statistical Research Data Centers (FSRDCs) by individuals who have Special Sworn Status; the results of such analyses must still go through a disclosure avoidance process prior to being publicly released.

The parties understand that Title 13 confidentiality protection and disclosure avoidance techniques apply to all work described in this agreement. The Census Bureau, who has the responsibility of carrying out that work, defines the disclosure avoidance methods. Accordingly, upon completion of the tabulation, the data produced must be reviewed by the Census Bureau to ensure that no identifiable Title 13 data are or may be disclosed. Should the Census Bureau's Disclosure Review Board (DRB) determine that the requested statistical product does or reasonably could result in such disclosure, then the data product will be modified prior to approval for release to the party(ies) of this agreement. The DRB must approve before a research product can be released to an individual who does not have Special Sworn Status (SSS) and a need to know, or moved to a computer not approved for controlled data according to Census' existing policies and procedures.

9. COMPUTER SECURITY REQUIREMENTS

The Census Bureau shall:

1. Process and store BOP data using a method consistent with government security and data encryption standards, including the Federal Information Security Modernization Act of 2014 (FISMA), Pub. L. 113-283, 128 Stat. 3073 (Dec. 18, 2014); and, where appropriate, related Office of Management and Budget (OMB) circulars and memorandums, such as Circular A-130, Managing Information as a Strategic Resource, 81 FR 49689 (July. 28, 2016), National Institute of Science and Technology (NIST) directives; and the Federal Acquisition Regulations (FAR). These laws, directives, and regulations include requirements for safeguarding Federal

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000464

information systems and personally identifiable information (PII) used in Federal agency business processes, as well as related reporting requirements. Both agencies recognize that laws, regulations, NIST standards, and OMB directives relating to the subject of this agreement and published subsequent to its effective date must also be implemented if mandated.

FISMA requirements apply to all federal contractors, organizations or sources that possess or use Federal information, or that operate, use or have access to Federal information systems on behalf of an agency. The recipient agency is responsible for oversight and compliance of their contractors and agents. BOP reserves the right to conduct onsite inspections to monitor compliance with FISMA regulations during the lifetime of this agreement.

2. Adhere to the limitations imposed by the Privacy Act of 1974. The Census Bureau will only display the data provided pursuant to this agreement to Census Bureau personnel or contractor-employees with a "need to know," in accordance with the allowable disclosure authority specified earlier.

3. Require a favorably adjudicated background investigation for all personnel who have direct (administrative) access to BOP data.

4. Prior to initiation of any data exchange under this MOU and any time thereafter that the Census Bureau system where BOP data will reside is re-certified and accredited, provide BOP with a written statement from its agency security manager stating that its network or other interconnecting end system complies with applicable federal mandates for system security authorization.

5. BOP may suspend or terminate its provision of data to the Census Bureau or access to the BOP's data file or data in the event of a security breach or data loss to the Census Bureau or connected systems.

AMERICAN OVERSIGHT

Attachment B: Description of Approved Research Project

Project to use Administrative Records Data to Support Executive Order 13880

The Census Bureau plans to use several administrative data sources of citizenship status in a statistical model that will produce a probability of being a U.S. citizen on April 1, 2020 for each person in the 2020 Census. The citizenship probability will be used, together with age, race, ethnicity, and location information from the 2020 Census, to produce Citizen Voting Age Population (CVAP) statistics. The objective of the project is to determine the number of citizens and non-citizens in the country.

Person records in each administrative and survey data source, including the 2020 Census, will be validated and assigned a unique person identifier, called a Protected Identification Key (PIK). The PIKs will be used to link each person's citizenship information to their 2020 Census record. The citizenship probability for persons in the 2020 Census without PIKs will be estimated based on local area information and the person's demographic characteristics, but not the person's citizenship, which makes the estimate much less accurate than if the person's citizenship information were available. The validation process (called the Person Identification Validation System (PVS)) involves comparing records to high-quality federal government sources (called reference files) using fields such as Social Security Number (SSN), name, date of birth, sex, and residential address. Currently the reference files are limited to the Social Security Administration's (SSA's) Numident file and the Internal Revenue Service's (IRS's) Individual Taxpayer Identification Number (ITIN) file. Several million U.S. residents have neither an SSN nor an ITIN, however. Thus, even if such a person's information in an administrative or survey source is accurate, it will not be found in the reference files, no PIK will be assigned, and the person's citizenship probability will be estimated without the benefit of information about her/his citizenship status. Just because a person does not have, a PIK does not necessarily mean the person doesn't have an SSN or ITIN, however. Records often contain errors in personally identifiable information (PII), missing information, or variants not seen in the reference files (e.g., a name or address change), leading to a failure to validate. Thus, imposing an assumption that all persons without PIKs are not U.S. citizens would lead to a significant underestimate of the number of citizens.

Once citizenship data sources and the 2020 Census person file have been assigned PIKs, the citizenship data will be linked to the 2020 Census person file. A model will be estimated for each person with a PIK, using the most current citizenship status from each available citizenship source for the person, as well as the person's other demographic, household, and location information as explanatory variables. The model will produce a citizenship probability for each person, which will then be combined with age, race, ethnicity, and location information from the 2020 Census to produce the Citizen Voting Age Population (CVAP) statistics.

Having more than one source of citizenship information is necessary, because no one source is complete and up-to-date. The SSA Numident contains citizenship status for most of the population. But the information is not always up-to-date for foreign-born

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000466

persons. Prior to the 1970's people were not required to provide evidence of citizenship status when applying for an SSN. Thus, the citizenship status is blank for many older people in the Numident. Also, naturalized citizens are not required to notify SSA about their naturalization. Thus, a naturalized citizen's SSA record may incorrectly say the person is not a citizen.

Having information about not only whether a person is a U.S. citizen or not at a point in time, but also their country of origin, visa status, and how long they have been in that status, could help predict naturalization at a later date, because naturalization rates vary across countries of origin, visa statuses, and lengths of time in status. This would be useful for estimating the current citizenship status for persons with citizenship information sometime in the past, but who lack current information.

Prior to producing citizenship statistics in the fall/winter of 2020-2021, the Census Bureau will do extensive testing of the citizenship models. Researchers will use past censuses and the American Community Survey (ACS) as person frames (in place of the 2020 Census), together with citizenship information from administrative sources in the same time periods. The testing will require historical data.

The administrative records data will both expand the coverage of persons with citizenship information in the 2020 Census and provide more up-to-date citizenship information for those already covered by other sources, resulting in more accurate statistics about the U.S. citizen population.

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000467

AMERICAN OVERSIGHT

BOC IAA Number: 0094-2016-NFE-0033

Interagency Agreement between the U.S. Census Bureau and U.S. Department of Health and Human Services 0094-FY16-NFE-0033.001

I. PURPOSE:

The purpose of this no-cost agreement is for the Office of Family Assistance (OFA) of the Administration of the United States Department of Health and Human Services (HHS) to provide the United States Census Bureau (Census Bureau) with Temporary Assistance for Needy Families (TANF) recipient information. Under this agreement, HHS will transfer confidential TANF information to the Census Bureau. In turn, the Census Bureau will return tabulated TANF data to HHS upon request that will help HHS develop better measures of poverty, inequality, the receipt of government transfers, and the effects of state programs on a variety of outcomes. The Census Bureau will benefit by using the TANF data to improve its Title 13, U.S. Code (U.S.C.), authorized censuses and surveys.

This agreement constitutes the renewal of Interagency Agreement 0094-2011-NFE-7515A.

II. BACKGROUND:

The Census Bureau's Longitudinal Employer-Household Dynamics (LEHD) program combines federal and state administrative data on employers and employees with core Census Bureau censuses and surveys to develop new data products, to improve the quality and understanding of survey products, and to facilitate research on the state of the economy and the nation. The goal of the LEHD program is to build a longitudinal national frame of jobs with an associated data infrastructure to support rapid production of timely, rich results. The present infrastructure includes the history and characteristics for each worker and each employer covered under the state unemployment insurance wage record system for participating states.

The Census Bureau's Demonstration of Administrative Records Improving Surveys (DARIS) research project analyzes direct and indirect uses of administrative data to enhance survey data collection, processing, and analysis. DARIS builds upon ten years of administrative data research projects benefitting State and Federal Agencies including the Medicaid Undercount Project and Earned Income Participation Rate Project. The goal of the DARIS project is to improve survey frames, develop model-based edits and allocations, and evaluate data quality over time. The Census Bureau entered into these projects with collaborating agencies pursuant to the Census Bureau's authority under 13 U.S.C., Section 8(b); no confidential Title 13, U.S.C. data were provided to the collaborating agencies.

Both HHS and the Census Bureau would like to build on the successes of the LEHD and DARIS projects through national TANF data analyses. Sharing data with the Census

AMERICAN OVERSIGHT

Bureau will permit analyses of demographic characteristics and labor market outcomes of TANF recipients. Understanding variations in participation across demographics and states will directly benefit state and federal program managers. Data sharing and analysis of linked files under this agreement are solely for statistical purposes, not for enforcement purposes.

The TANF data are and will remain confidential, whether in their original form or when commingled or linked under this agreement, as explained in Section IV.

III. LEGAL AUTHORITY:

A. The Census Bureau is authorized to enter into this agreement pursuant to 13 U.S.C., Section 8(b), which allows the Census Bureau to engage in joint statistical projects with Federal and State Agencies on matters of mutual interest, upon equitable apportionment of costs. Additional authority is provided by 13 U.S.C., Section 6 which allows the Census Bureau to obtain information pertinent to the Census Bureau's Title 13 U.S.C. work from federal and State Agencies.

B. HHS is authorized to enter into this agreement pursuant to 42 U.S.C., Sections 613 and 614, which authorize the HHS to participate in research, evaluations, and national studies, particularly for the Census Bureau. Additional information can be found in the amended Systems of Record Notice, 09-90-0151; Federal Register Vol. 69, No. 115, June 16, 2004.

IV. CONFIDENTIALITY:

The TANF data that HHS provides to the Census Bureau under this agreement are confidential under multiple federal statutes and regulations listed below:

Medicaid, 42 U.S.C., Section 1396a (a)(7), 42 CFR Part 431.300-307;
Temporary Assistance to Needy Families, 42 U.S.C., Section 602 (a) (1) (A) (iv);
Supplemental Nutrition Assistance Program (SNAP), 7 U.S.C., Section 2020(e)(8), 7 CFR Part 272.1(c);
Social Security Act, 42 U.S.C., Section 1396(a)(a)(7)
Social Security Administration Disclosure, 20 CFR Part 401;
Child Support, 42 U.S.C., Section 654(26);
Public Assistance Programs (Public Welfare), 45 CFR Part 205.50; and
U.S. Department of Labor Employment and Training Administration, 20 CFR Part 603.

The continued confidentiality of data once acquired by the Census Bureau is guaranteed under 13 U.S.C., Section 9. The Census Bureau agrees that any information shared under this agreement will remain confidential, that no data under this agreement will be disclosed in individually-identifiable form, and that all uses will be solely for statistical purposes and not for purposes of enforcement.

AMERICAN OVERSIGHT

Data transmitted to the Census Bureau will become a part of the Census Bureau's Statistical Administrative Records System (StARS) and is covered under the Census Bureau's System of Records Notice COMMERCE/CENSUS-8, StARS. As such, these records are subject to all requirements and conditions of the Privacy Act of 1974.

To the extent authorized by federal law: When the Census Bureau publicly releases information pursuant to this agreement, it shall not identify any individual or business entity and all results will have met the Census Bureau disclosure avoidance guidelines. Full Title 13 confidentiality is provided to protect the identities of individuals in all items derived from program data until the data are destroyed. The Census Bureau agrees to allow data providers the ability to verify that findings, listings, information derived, or any combination of data extracted or derived from the program data properly protects the identities of individuals according to the standards applicable to Title 13 data.

Both parties acknowledge that substantial penalties exist for wrongful disclosure of TANF information provided under this agreement:

A. Unauthorized disclosure of the information provided under this agreement may violate the terms of 13 U.S.C., Section 9; 42 U.S.C., Section 1306; 5 U.S.C., Section 552a; and 44 U.S.C., Section 3501. In the event of inconsistency, the parties agree that the most restrictive provisions of these statutes will apply in determining what constitutes an unauthorized disclosure.

B. The penalties stipulated for wrongful disclosure in 13 U.S.C., Section 214; 42 U.S.C., Section 1306; 5 U.S.C., Section 552a; and 44 U.S.C., Section 3501 may include imprisonment for up to five years, a fine, or both.

C. Knowingly and willfully disclosing or obtaining records(s) under false pretenses may also violate provisions of 5 U.S.C., Section 552a, resulting in penalty. Taking or converting records(s) to one's own use or receiving the file(s) knowing they were stolen or converted may violate 18 U.S.C., Section 641, resulting in penalty.

By signing this agreement, the Census Bureau agrees to abide by all provisions set out in this agreement for protection of all information contained in the data file(s) specified in Section VI and acknowledges having received notice of potential criminal, administrative, or civil penalties for violation of the applicable laws supporting the terms of the agreement.

V. SCOPE OF THE WORK:

Under this agreement, the Census Bureau will link the TANF data with other records at the Census Bureau, including but not limited to data from the Longitudinal Employer-Household Dynamics (LEHD) database, State Unemployment Insurance Wage records, and survey data including the Survey of Income and Program Participation (SIPP), the Current Population Survey (CPS), and the American Community Survey (ACS).

AMERICAN OVERSIGHT

This linkage will be accomplished using a unique linkage identifier called a Protected Identification Key (PIK). After the PIK process, direct identifiers will be separated from the linked files. Processing to assign a PIK to each person record involves matching using name, address, sex, date of birth, and Social Security Number (SSN) data, as available. The validation and PIK process is robust and has been used by other internal and external Census Bureau research projects. Only Census Bureau staff conducting the record linkage will have access to files with the direct identifiers, and access to the PIK'ed files will be limited to those with a need to know.

Research projects exploring whether the administrative records represent the same individuals in survey or census households may need access to name data. Such access would only be granted through approval by the Census Bureau Data Stewardship Executive Policy Committee. Researchers would not have access to Social Security Numbers.

The Census Bureau benefits in that it will use these linked data to improve the quality of the censuses and surveys that it conducts. The data contained in the linked files are to be used only for the statistical projects described in the Attachment A. New projects may be initiated in writing to HHS and the Census Bureau Data Custodian for review and written approval by both agencies throughout the term of this agreement. New projects must include a description of the project, Title 13 benefits to the Census Bureau, and the specific individuals who will be involved in the research. All new projects and any modifications, expansions, or enhancements to existing projects that are approved will be subject to all of the terms and conditions of this agreement.

HHS will benefit in that the Census Bureau will produce tabulated TANF data that can be used by HHS to improve program administration for the TANF programs.

VI. RESPONSIBILITIES OF THE PARTIES:

A. The Census Bureau agrees:

1. The Census Bureau staff may access the TANF data, in original form or when commingled or integrated, only for approved projects.

2. The Census Bureau will be permitted access to the SSN of all adult TANF recipients for 2015 through 2020, and subsequent years as they become available and continued use of 2000 and 2002-2014 data.

3. The Census Bureau will provide progress reports to HHS on these projects annually. New project proposals or extensions of current research will be provided to HHS in these progress reports. HHS concurrence is required prior to the use of linked data for new projects.

4. The Census Bureau may integrate the TANF data into the Census LEHD microdata. The Census Bureau will retain the integrated TANF data under this

AMERICAN OVERSIGHT

agreement indefinitely. By delivering TANF data, HHS gives the Census Bureau the right to retain and use the data files indefinitely. Once data are entered into the Census Bureau administrative data system and joined to microdata from other sources, all records are considered to be Title 13 data.

5. Selected tabulations developed in the project from the matched survey and administrative data files may be requested by HHS for evaluation of TANF participation and transitions. Such tabulations will be aggregated sufficiently to guarantee survey respondent and TANF participant confidentiality.

6. All Census Bureau research reports made possible using data from this project will be provided to HHS. At the completion of the project, the Census Bureau will deliver a summary of project outputs including reports, articles, and conference presentations to HHS.

7. All data, records, data elements, and any other information collected, gathered, obtained, or otherwise received by the Census Bureau under this agreement shall be protected from unauthorized disclosure. All information regarding recipients is confidential, and the Census Bureau shall follow the appropriate requirements to maintain the confidentiality of information concerning TANF recipients. Any violations of this provision or the provisions of the federal statutes listed above shall be considered cause for immediate termination of the data sharing agreement.

8. Data acquired under this agreement may be accessed in the Census Bureau's Research Data Centers (RDCs) using the Census Bureau's standard data protection processes. Access to the anonymized analytical data files covered by this agreement shall be limited to the minimum number of individuals necessary to achieve the purpose stated in this section and will include Title 13, U.S.C., Section 23(c) Special Sworn Status (SSS) researchers participating in the project at Census Bureau RDCs.

B. HHS agrees:

1. To prepare and forward TANF data (2015 through 2020) to the Census Bureau, on CD ROM that is FIPS 140-2 compliant (i.e., encrypted and password protected CD ROM) via Private Courier Service (e.g., FedEx, UPS). The password will be verbally relayed to the Census Bureau Point of Contact.

2. To prepare and forward subsequent years of TANF data to the Census Bureau as they become available via Secure File Transfer Protocol (SFTP) and assigning a user ID and password.

3. To provide ASCII record layouts and record counts of TANF data (2015 through 2020) and data dictionaries with the initial and subsequent years of delivery (Attachment B).

AMERICAN OVERSIGHT

4. When the Census Bureau sends HHS pre-publication copies of publications, reports, or other documents that contain summaries or aggregations, HHS agrees to review and provide comments and clearance or rejection within thirty (30) days. If no response is received within this period, the Census Bureau shall send a reminder notice. If no response is received within three (3) business days, HHS will be deemed to have approved the publication and/or distribution to persons outside of authorized staff under this agreement.

VII. DURATION AND FUNDING:

This agreement is effective on May 14, 2016 and has a term of five years; however, if at the end of five years, the parties wish to renew the agreement, they should execute a new agreement signed by appropriate agency officials.

This agreement must be formally reviewed whenever a Federal statute is enacted that materially affects the substance of the agreement. The review will be conducted by the Census Bureau Associate Director and at the Director level at HHS. The result of the review will be a decision agreed to by both agencies to continue the agreement unchanged, amend the agreement, or cancel the agreement. Any amendments to the agreement will require the review and approval at the Director level at HHS and the Associate Director level at the Census Bureau.

The costs of this agreement are equitably apportioned between the parties to this agreement. No funds will be transferred as a result of this agreement between HHS and the Census Bureau; however, the parties believe that their contributions are roughly equivalent. The value of the Census Bureau analysis to produce a research report is approximately $60,000. Other agencies face an average cost of $75,000 to deliver administrative data extracts to the Census Bureau. The Census Bureau's estimated percentage of total in-kind costs of this project are 45% and HHS's estimated percentage total of in-kind costs of this project are 55%.

This agreement may be terminated by either agency upon a 30-day advance written notice.

VIII. DATA MANAGEMENT AND SECURITY:

The Census Bureau assumes an obligation to keep all data received from other agencies in confidence and to use the data for statistical purposes only in accordance with the provisions of Title 13, United States Code. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, Title 13 protection.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r3 "*Recommended Security*

AMERICAN OVERSIGHT

Controls for Federal Information Systems and Organizations," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach.*" The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO as well as the Department of Commerce Office of Inspector General as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*". Security controls and subsequent assessments are done based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are reported within one hour to the US CERT. Once the Census Bureau becomes aware of a known breach of HHS/Center for Medicare & Medicaid Services (CMS)/ Assistant Secretary for Planning and Evaluation (ASPE) data, the Census Bureau will contact the identified HHS/CMS/ASPE contacts to discuss the actions and potential remedies in regards to the incident.

IX. DATA CUSTODIAN:

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will, in a representative capacity, comply with all of the designated provisions of this agreement on behalf of the Census Bureau, including observance of conditions of use and establishment and maintenance of security arrangements as specified in the agreement to prevent unauthorized use.

AMERICAN OVERSIGHT

X. POINT OF CONTACT:

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of HHS and the Census Bureau:

HHS Point of Contact:

Susan Golonka
Deputy Director
Office of Family Assistance
Administration for Children and Families
Department of Health and Human Services
330 C St. SW, Washington, D.C. 20201
Susan.Golonka@acf.hhs.gov
(202) 401-4731

Census Bureau Point of Contact:

Michael Berning
Assistant Center Chief, Operations
Center for Administrative Records
Research and Applications (CARRA)
U.S. Census Bureau
4600 Silver Hill Road, 5K123
Washington DC 20233
(301) 763-2028
Michael.A.Berning@census.gov

XI. DISPUTE RESOLUTION:

Nothing in this agreement is intended to conflict with current Census Bureau or HHS directives. If the terms of this agreement are inconsistent with existing directives of either party, then those portions of this agreement which are determined to be inconsistent shall be invalid, but the remaining terms and conditions not affected by the inconsistency shall remain in full force and effect. At the first opportunity for review of the agreement, all necessary changes will be accomplished either by an amendment to this agreement or by entering into a new agreement, whichever is deemed expedient to the interest of both parties.

Disputes shall be resolved pursuant to applicable provisions of the Business Rules for Intragovernmental Transactions delineated in the Treasury Financial Manual, Vol. 1, Bulletin 2007-03, Section VII (Resolving Intragovernmental Disputes and Major Differences).

AMERICAN OVERSIGHT

XII. SIGNATURES:

On behalf of the Census Bureau, the undersigned individual hereby attests that he or she is authorized to enter into this agreement and agrees to all the terms specified herein.

2/18/16

Ron Jarmin (Date)
Assistant Associate Director for Research and Methodology

On behalf of HHS, the undersigned individual hereby attests that he or she is authorized to enter into this agreement and agrees to all the terms specified herein.

3/1/2016

Susan Golonka (Date)
Deputy Director
Office of Family Assistance

AMERICAN OVERSIGHT

Attachment A

Census Bureau's Description of Approved Projects

1. Longitudinal Employer-Household Dynamics (LEHD) Analysis

The LEHD program combines data from the Economic Directorate with that of the Demographic Directorate by means of linking administrative, census, and survey records for individuals and businesses. This project has linked TANF data for almost all states for 2000 and 2002-2006 to data used in the LEHD program. This project will use employer data, unemployment insurance wage data, and the person characteristics based on modeled and SSA Numident data to track employment and wage outcomes for those who have received TANF. Linked TANF data for this project are covered under the Census Bureau's System of Record Notice (SORN) CENSUS-9, Longitudinal Employer-Household Dynamics System, as well as under the Census Bureau's SORN CENSUS-8, Statistical Administrative Records System.

Of particular interest to this project are individuals who left TANF, especially their demographic and employment characteristics. Some characteristics may be compared to those who continue to receive benefits or a reference group of individuals who never received TANF. This project may analyze employment and earnings outcomes of individuals who left TANF. These analyses will be based on merging data on TANF recipients to Unemployment Insurance (UI) wage data. We may examine quarterly and annual measures, such as the percent of leavers employed and fuzzed median earnings.

The planned output is intended to focus on results pooled across multiple states. Statistics using sub-groupings of states may be included, if appropriate. Any state-specific results would require approval of the states in question.

Benefits to Census Bureau:
This research program will explore the potential for using administrative records to improve economic and demographic censuses, surveys, and intercensal population estimates. As part of the research, TANF data may be included in our research database called the Longitudinal Employer Household Dynamics Database. The goal is to develop optimal combinations of administrative record file information based on data accuracy, timeliness, and availability.

Benefits to HHS:
The LEHD feasibility analysis has been developed with cooperation of HHS staff to ensure that statistical products use appropriate methodologies.

2. Evaluation and Improvement of Demographic Surveys Using TANF Administrative Records

The Census Bureau administers multiple household surveys that collect data on the participation in TANF and public assistance programs. This project will evaluate the

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000478

quality of these data and propose modifications to survey instruments that will improve the quality of future data collections.

The project will focus on evaluating and improving the TANF coverage in the American Community Survey (ACS), the Current Population Survey (CPS), and the Survey of Income and Program Participation (SIPP). In the case of SIPP, this evaluation will inform the redesign of the SIPP survey instrument that is currently underway. The project will use the complete set of administrative records to consider coverage issues and distributional comparisons. The project will use linked survey and administrative records to compare details of program participation and to study patterns of non-response.

Benefits to Census Bureau: This project will evaluate the quality of Census Bureau survey data and potential to improve survey instruments for Census Bureau demographic surveys.

Benefits to HHS: This project will improve the usefulness of Census Bureau survey data for the administration of TANF programs by assessing and improving the accuracy of the survey data on the details of participation in these programs.

3. Enhance Record Linkage Methods

Census will improve our person validation and record linkage methods by processing the TANF data and using it in linked record analyses. These data will provide a valuable new source of information on the low income population. This population is hard to count, which could lead to them being underrepresented in surveys and enumerations.

The ability to match administrative records from a variety of providers reveals information about the relative quality and coverage of source data.

Benefits to Census Bureau: Data will allow us to develop and evaluate trends in match rates among persons in administrative record files. Census may also be able to evaluate how differences in match rates between states are attributable to data collection differences or in discrepancies in the Census Bureau linkage system, and measure the impact on survey and census analyses.

Benefits to HHS: This project will provide information about the coverage and quality of Census Bureau survey frames and responses, and will lead to improvements in survey estimates of persons in social welfare programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000479

pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

A. validating and enhancing the Master Address File (MAF);[1]
B. designing and assigning resources to carry out the 2020 Census;[2]
C. unduplicating public, private, and census lists; and
D. imputing missing data.[3]

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

Benefits to the Census Bureau: Data will allow improvements to data quality and methods to collect, measure and tabulate persons and housing units. Use of the TANF data will allow Census to model outreach and enumeration efforts for the hard-to-reach low income population. Use of the TANF data will enhance the race and ethnicity analyses and imputations needed in census data. The project will use the TANF data along with other federal, state, and commercial sources to develop statistical methods including models to support census operations.

Benefits to HHS: Data will allow improvements to decennial census data quality. Accurate decennial census population and housing unit counts are critical inputs to Census Bureau surveys and statistical products. The population counts and characteristics form the basis for all survey weighting methods. The housing unit frame, or Master Address File, is used for address-based sampling for the major demographic surveys. As a user of public use and internal survey files (through this joint statistical project), HHS will benefit from using frames and weights that allow samples to represent the U.S. population.

[1] Examples of possible Census Bureau uses include updating and evaluating the Master Address File.
[2] Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.
[3] Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000480

Attachment B - Variable List

Family Record	Adult Record
FIPS_CODE	FIPS_CODE
RPT_MONTH_YEAR	RPT_MONTH_YEAR
CASE_NUMBER	CASE_NUMBER
REGION_CODE	FAMILY_AFFILIATION
COUNTY_FIPS_CODE	NONCUSTODIAL_PARENT
STRATUM	DATE_OF_BIRTH
ZIP_CODE	SSN
FUNDING_STREAM	RACE_HISPANIC
DISPOSITION	RACE_AMER_INDIAN
NEW_APPLICANT	RACE_ASIAN
NBR_FAMILY_MEMBERS	RACE_BLACK
FAMILY_TYPE	RACE_HAWAIIAN
RECEIVES_SUB_HOUSING	RACE_WHITE
RECEIVES_MED_ASSISTANCE	GENDER
RECEIVES_FOOD_STAMPS	FED_OASDI_PROGRAM
AMT_FOOD_STAMP_ASSISTANCE	FED_DISABILITY_STATUS
RECEIVES_SUB_CC	DISABLED_TITLE_XIVAPDT
AMT_SUB_CC	AID_AGED_BLIND
CHILD_SUPPORT_AMT	RECEIVE_SSI
FAMILY_CASH_RESOURCES	MARITAL_STATUS
CASH_AMOUNT	RELATIONSHIP_HOH
NBR_MONTHS	PARENT_MINOR_CHILD
CC_AMOUNT	NEEDS_PREGNANT_WOMAN
CHILDREN_COVERED	EDUCATION_LEVEL
CC_NBR_MONTHS	CITIZENSHIP_STATUS
TRANSP_AMOUNT	COOPERATION_CHILD_SUPPORT
TRANSP_NBR_MONTHS	MONTHS_FED_TIME_LIMIT
TRANSITION_SERVICES_AMOUNT	MONTHS_STATE_TIME_LIMIT
TRANSITION_NBR_MONTHS	CURRENT_MONTH_STATE_EXEMPT
OTHER_AMOUNT	EMPLOYMENT_STATUS
OTHER_NBR_MONTHS	WORK_ELIGIBLE_INDICATOR
SANC_REDUCTION_AMT	WORK_PART_STATUS
WORK_REQ_SANCTION	UNSUB_EMPLOYMENT
FAMILY_SANC_ADULT	SUB_PRIVATE_EMPLOYMENT
SANC_TEEN_PARENT	SUB_PUBLIC_EMPLOYMENT
NON_COOPERATION_CSE	WORK_EXPERIENCE_HOP
FAILURE_TO_COMPLY	WORK_EXPERIENCE_EA
OTHER_SANCTION	WORK_EXPERIENCE_HOL
RECOUPMENT_PRIOR_OVRPMT	OJT
OTHER_TOTAL_REDUCTIONS	JOB_SEARCH_HOP
FAMILY_CAP	JOB_SEARCH_EA

AMERICAN OVERSIGHT

Family Record	Adult Record
REDUCTIONS_ON_RECEIPTS	JOB_SEARCH_HOL
OTHER_NON_SANCTION	COMM_SERVICES_HOP
WAIVER_EVAL_CONTROL_GRPS	COMM_SERVICES_EA
FAMILY_EXEMPT_TIME_LIMITS	COMM_SERVICES_HOL
FAMILY_NEW_CHILD	VOCATIONAL_ED_TRAINING_HOP
	VOCATIONAL_ED_TRAINING_EA
	VOCATIONAL_ED_TRAINING_HOL
	JOB_SKILLS_TRAINING_HOP
	JOB_SKILLS_TRAINING_EA
	JOB_SKILLS_TRAINING_HOL
	ED_NO_HIGH_SCHOOL_DIPL_HOP
	ED_NO_HIGH_SCHOOL_DIPL_EA
	ED_NO_HIGH_SCHOOL_DIPL_HOL
	SCHOOL_ATTENDENCE_EA
	SCHOOL_ATTENDENCE_HOL
	PROVIDE_CC_HOP
	PROVIDE_CC_EA
	PROVIDE_CC_HOL
	OTHER_WORK_ACTIVITIES
	DEEMED_HOURS_FOR_OVERALL
	DEEMED_HOURS_FOR_TWO_PARENT
	EARNED_INCOME
	UNEARNED_INCOME_TAX_CREDIT
	UNEARNED_SOCIAL_SECURITY
	UNEARNED_SSI
	UNEARNED_WORKERS_COMP
	OTHER_UNEARNED_INCOME

Child Record
FIPS_CODE
RPT_MONTH_YEAR
CASE_NUMBER
FAMILY_AFFILIATION
DATE_OF_BIRTH
SSN
RACE_HISPANIC
RACE_AMER_INDIAN
RACE_ASIAN
RACE_BLACK
RACE_HAWAIIAN
RACE_WHITE
GENDER

AMERICAN OVERSIGHT

RECEIVE_NONSSA_BENEFITS
RECEIVE_SSI
RELATIONSHIP_HOH
PARENT_MINOR_CHILD
EDUCATION_LEVEL
CITIZENSHIP_STATUS
UNEARNED_SSI
OTHER_UNEARNED_INCOME

AMERICAN OVERSIGHT

AMERICAN OVERSIGHT

MODIFICATION NO. 1
TO THE MEMORANDUM OF AGREEMENT (MOA) BETWEEN
THE BUREAU OF THE CENSUS AND THE FEDERAL BUREAU OF PRISONS
0094.-FY15-NFE-0018.001

This document constitutes an amendment to Agreement No. 0094-FY15-NFE-0018 between the Research and Methodology Directorate U.S. Census Bureau (Census Bureau) and the Bureau of Prisons beginning October 9th, 2015 and will terminate September 1st, 2020. The amendment (i) documents the parties' agreement to expand the scope of the joint project to include additional statistical research on household resources and household characteristics and (ii) reflects that the BOP will provide additional data to facilitate this additional research and Census will maintain the confidentiality of such data. The purpose of the amendment is to:

Add the following in section 2:

The Census Bureau Data Stewardship Executive Policy (DSEP) Committee approves the linking of Census Bureau Longitudinal Employer-Household Dynamics (LEHD) data (pending data provider approval) and IRS microdata (pending data provider approval) with Federal Bureau of Investigation (FBI) arrest data and Bureau of Prisons Corrections data. This data will be used to investigate the relationship between employment and return to incarceration.

DSEP has also approved a sub-project that would link Census American Community Survey (ACS) data with BOP Corrections data to examine income reporting of federal prisoners. The data for this sub-project would only be available to Census researchers.

Replace 3. CONFIDENTIALITY OF DATA PROTECTION OF HUMAN RESEARCH SUBJECTS with the following:

BOP: All data analyzed under this MOU are subject to the privacy and confidentiality requirements of section 812 of the Omnibus Crime Control and Safe Streets Act of 1968 as amended ("Omnibus"), codified at 42 U.S.C. § 3789g. The federal regulations implementing the privacy and confidentiality requirements of section 812 of Omnibus are found at 28 C.F.R. Part 22. The collection and use of data by BOP (and its agents) are governed in part by Section 304 of Omnibus, codified at 42 U.S.C. § 3735.

All provisions of this agreement are subject to the requirements of 28 C.F.R. Part 46 regarding the protection of human subjects.

Census Bureau: The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence and to use the data for statistical purposes only in accordance with the provisions of Title 13, United States Code. Upon receipt, all data acquired as a result of this MOA will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with the National Institute of Standards and Technology (NIST) Federal Information Processing Standards (FIPS) 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "Recommended Security Controls for Federal Information Systems and Organizations," as well as Special Publication 800-37r1 "Guide for

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000485

Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO as well as the Department of Commerce Office of Inspector General as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "Standards for Security Categorization of Federal Information and Information Systems" and NIST Special Publication 800-60r1 "Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices." Security controls and subsequent assessments are done based on the final categorization.

Cloud providers must be approved for at least moderate level information through the GSA FedRAMP process prior to acquiring any services. Census Bureau identifies, assesses and authorizes use based on the published FedRAMP results and an assessment of any Census Bureau (customer provided) controls implemented to protect the infrastructure and data. Security reporting on cloud providers is reported to the Department of Commerce on a regular basis under FISMA.

If either agency experiences a loss of PII provided by the other under the terms of this agreement, that agency will follow OMB loss reporting guidelines (OMB M-17-12 "Preparing for and Responding to a Breach of Personally Identifiable Information") and notify the United States Computer Emergency Readiness Team (USCERT) within one (1) hour of discovering the incident. In addition, they will immediately notify the other agency's Information Security Programs Section (BOP: 202-514-2049 or 202-307-6667; Census Security Operations Center 301-763-5141) in the event of any actual or suspected breach of such data (i.e., Loss of control, compromise, unauthorized disclosure, access for an unauthorized purpose, or other unauthorized access, whether physical or electronic). If within one (1) hour Census has been unable to make a report to the BOP contact(s) named herein, Census will call the DOJ Computer Emergency Readiness Team (DOJCERT) at 1-866-US4-CERT (1-866-874-2378) and make the report. If within one (1) hour BOP has been unable to make a report to the Census contact named herein, BOP will call the Census Enterprise Service Desk at 301-763-3333 and make the report.

Census agrees to promptly consider and adjudicate any and all claims which may arise out of this Agreement resulting from the actions of their agency, duly authorized representatives, or contractors, and to pay for any damage or injury as may be required by Federal law. Such adjudication will be pursued under the Federal Tort Claims Act, 28 U.S.C. Section 2671 et seq., the Federal Employees Compensation Act, 5 U.S.C. Section 8101 et seq., or such other legal authority as may be pertinent.

Add in Section 3. CONFIDENTIALITY OF DATA PROTECTION OF HUMAN RESEARCH SUBJECTS with the following as a new item:

Disclosure Avoidance Review of Statistical Products

Title 13, Section 9 of the United States Code (U.S.C.) requires the Census Bureau to keep confidential the information collected from the public under the authority of Title 13. Section 214 of Title 13, U.S.C., and Sections 3551, 3559 and 3571 of Title 18, U.S.C., provide for the

AMERICAN OVERSIGHT

imposition of penalties of up to five years in prison and/or up to $250,000.00 in fines for wrongful disclosure of confidential census information.

Disclosure avoidance is the process for protecting the confidentiality of data, as required under Title 13 U.S.C. A disclosure of data occurs when someone can use published statistical information to identify an individual who has provided confidential information. For data tabulations, the Census Bureau uses disclosure avoidance procedures to modify or remove the characteristics that put confidential information at risk for disclosure. Although a published table may appear to show information about a specific individual, the Census Bureau has taken steps to disguise or suppress the original data, while making sure the results are still useful. The techniques used by the Census Bureau to protect confidentiality in tabulations vary, depending on the type of data.

Noise injection is the Census Bureau's preferred disclosure avoidance technique. By policy, noise injection is to be applied to all data products that are reported with geographies smaller than a state. In cases when it is not feasible to fully implement noise injection within the period of the contract, a transition plan for implementing noise injection or other provable privacy methods must be developed in coordination with the Census Bureau. Noise injection may be required for microdata releases, depending on the characteristics of the microdata and the specific variables that are to be released. Data that cannot be publicly released may still be analyzed within the Federal Statistical Research Data Centers (FSRDCs) by individuals who have Special Sworn Status; the results of such analyses must still go through a disclosure avoidance process prior to being publicly released.

The parties understand that Title 13 confidentiality protection and disclosure avoidance techniques apply to all work described in this agreement. The disclosure avoidance methods are defined by the Census Bureau who has the responsibility of carrying out that work. Accordingly, upon completion of the tabulation, the data produced must be reviewed by the Census Bureau to ensure that no identifiable Title 13 data are or may be disclosed. Should the Census Bureau's Disclosure Review Board (DRB) determine that the requested statistical product does or reasonably could result in such disclosure, then the data product will be modified prior to approval for release to the party(ies) of this agreement. The DRB must approve before a research product can be released to an individual who does not have SSS and a need to know, or moved to a computer not approved for controlled data according to Census' existing policies and procedures.

Add the following as a new item in section 5:

5.A.5. Census Bureau shall provide LEHD and IRS microdata pending data provider's approval.

5.B.2. Provide data necessary to support this project, transferred to the Census Bureau via a mutually agreeable secure method (such as File Transfer Protocol (FTP) over TLS). The usage of this data is authorized by and subject to the terms and conditions of the data owner as specified in Attachment 2, Information Transfer Agreement.

Change the FTE for Census from 1.25 to 1.50 in section 6.

The costs associated with this agreement are equitably apportioned. Census will provide 1.50 FTE to analyze the linked survey and administrative data and manage the joint statistical

AMERICAN OVERSIGHT

project: including security, data stewardship, and disclosure avoidance reviews. BOP will provide 1.5 FTE to analyze the linked survey-administrative records data.

Change Census contact to 7. Points of Contact with the following:

Michael Berning
U.S. Census Bureau
4600 Silver Hill Road
Washington D.C. 20233
Michael.A.Berning@census.gov

Replace the termination date to section 8:

The agreement will terminate on December 31st, 2020 but may be amended at any time by mutual consent of the parties.

Add the following project to Attachment 1. Proposed Projects Using Data Disclosed by BOP as project 5:

5. The BOP is tasked by the Office of Management and Budget with investigating the relationship between employment and return to incarceration. To fulfill this task, the BOP plans to join records on the 2009 release cohort from the BOP Corrections Statistics Program File with other data held by Census, primarily the Longitudinal Employer-Household Dynamics (LEHD) data, and, if approved, the IRS 1040 and 1099 extracts. The study also plans to use data from the publically-available ACS and Decennial Census Summary files to generate statistical controls for employment conditions in localities where the released inmates reside.

The BOP coded Pre-Sentence Investigations obtained from the U.S. Courts for the employment, criminal, and mental health histories of inmates for a sample of 6,600 inmates from the 2009 release cohort. With the joined data, the plan is to generate descriptive tables of the employment history of inmates in the three years immediately prior to incarceration and the three years immediately following release from federal incarceration. Wage and salary income is used as a proxy for employment status.

The resulting employment histories are then used to examine whether pre-incarceration employment predicts inmate participation in voluntary job training and education programs offered in the BOP and whether post-release employment and earnings effects post-release arrest history. The effect of pre- and post-incarceration employment ultimately is determined in multivariate statistical models with controls for criminogenic factors such as criminal history.

The first products of the analysis include bivariate descriptions of the relationship between employment and crime, with breakouts by race, sex, age, and criminal history. The multivariate results will be presented as well.

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000488

SIGNATURES

Steven D. Dillingham
Director
U.S. Census Bureau

7-20-2019
Date

Sonya D. Thompson
Acting Assistant Director/CIO
Information, Policy and Public Affairs Division
Federal Bureau of Prisons

Digitally signed by SONYA THOMPSON
Date: 2019.07.24 16:15:08 -04'00'

Date

Loneryl Burns
Procurement Executive
Federal Bureau of Prisons

Loneryl Burns Date: 2019.08.02 09:25:09 -04'00'

Date

AMERICAN OVERSIGHT

AMERICAN OVERSIGHT

MEMORANDUM OF UNDERSTANDING

THROUGH WHICH

THE U.S. CENSUS BUREAU IS ACQUIRING

Calendar Year 2012-2017 Tenant Rental Assistance Certification System (TRACS) and the Public and Indian Housing Information Center (PIC)

FROM

The U.S. Department of Housing and Urban Development

Agreement No. 0094-2012-NFE-001

1. PARTIES AND PURPOSE

This Memorandum of Understanding (MOU) establishes an agreement between the U.S. Census Bureau (Census Bureau) and the U.S. Department of Housing and Urban Development (HUD) for the acquisition of Calendar Year (CY) 2012-2017 Tenant Rental Assistance Certification System (TRACS) and the Public and Indian Housing Information Center (PIC) for use in its intercensal estimates program, the Statistical Administrative Records System, and other activities that support the Census Bureau's decennial census and survey programs.

2. AUTHORITY

The authority for the Census Bureau and HUD to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

3. TERMS AND CONDITIONS

The information provided by HUD under this agreement is confidential under the Privacy Act of 1974, 5 U.S.C. § 552a, as amended. The continued confidentiality of data once acquired by the Census Bureau is guaranteed by 13 U.S.C., Section 9. The Census Bureau agrees that any information received under this agreement will remain confidential, that no data under this agreement will be disclosed in individually-identifiable form, and that all uses will be solely for statistical purposes.

Data transmitted to the Census Bureau will become a part of the Census Bureau's Statistical Administrative Records System (StARS) and is covered under the Census Bureau's System of Records Notice COMMERCE/CENSUS-8, StARS. As such, these records are subject to all requirements and conditions of the Privacy Act of 1974.

To the extent authorized by federal law: When the Census Bureau publicly releases information pursuant to this agreement, it shall not identify any individual or business entity and all results will have met the

AMERICAN OVERSIGHT

Census Bureau disclosure avoidance guidelines. Full Title 13 confidentiality is provided to protect the identities of individuals in all items derived from program data until the data are destroyed. The Census Bureau agrees to allow HUD the ability to verify that findings, listings, information derived, or any combination of data extracted or derived from the HUD program data properly protects the identities of individuals.

Both parties acknowledge that substantial penalties exist for wrongful disclosure of HUD information provided under this agreement:

A. Unauthorized disclosure of the information provided under this agreement may violate the terms of 13 U.S.C., Section 9; 5 U.S.C., Section 552a; and 44 U.S.C., Section 3501. In the event of inconsistency, the parties agree that the most restrictive provisions of these statutes will apply in determining what constitutes an unauthorized disclosure.

B. The penalties stipulated for wrongful disclosure in 13 U.S.C., Section 214; 5 U.S.C., Section 552a; and 44 U.S.C., Section 3501 may include imprisonment for up to five years, a fine, or both.

C. Knowingly and willfully disclosing or obtaining records(s) under false pretenses may also violate provisions of 5 U.S.C., Section 552a, resulting in penalty. Taking or converting records(s) to one's own use or receiving the file(s) knowing they were stolen or converted may violate 18 U.S.C., Section 641, resulting in penalty.

By signing this agreement, the Census Bureau agrees to abide by all provisions set out in this agreement for protection of all information contained in the data file(s) and acknowledges having received notice of potential criminal, administrative, or civil penalties for violation of the applicable laws supporting the terms of the agreement.

Detailed file specifications and requirements of the Census Bureau's CY 2012-2017 request for the PIC and TRACS data are provided in Enclosures A and B. The Census Bureau will retain the original CY 2012-2017 PIC and TRACS data for two (2) years from the date of receipt. The Census Bureau will have unlimited use and ownership of the PIC and TRACS data after it is commingled with Title 13 data.

4. CONTACTS

The contacts of each party to this agreement are:

Agreement
David E. Chase
Director, Division of Program Monitoring and Research
Office of Policy Development and Research
U.S. Department of Housing and Urban Development
451 Seventh Street, S W
Room 8126
Washington, DC 20410
202-402-5733 **Phone**

AMERICAN OVERSIGHT

202-619-8360 **Fax**
david.e.chase@hud.gov **Email**

David Donovan, Assistant Division Chief
U.S. Census Bureau
DEPDIR/Policy Coordination Office
HQ-8H169
4600 Silver Hill Road
Suitland, MD 20746
301-763-3449 **Phone**
301-763-6239 **Fax**
david.donovan@census.gov **Email**

Data Custodian

Lydia B. Taghavi
Social Science Analyst,
Division of Program Monitoring and Research
Office of Policy Development and Research
U.S. Department of Housing and Urban Development
451 Seventh Street S.W. Room 1826
Washington, DC 20410
202-402-5741 **Phone**
202-619-8360 **Fax**
lydia.b.taghavi@hud.gov **Email**

Theresa Leslie, Senior Project Specialist
U.S. Census Bureau
ADRM/Project Management Planning, Coordination and Outreach Staff
HQ-2K277
4600 Silver Hill Road
Suitland, MD 20746
301-763-2958 **Phone**
301-763-4310 **Fax**
theresa.f.leslie@census.gov **Email**

Technical

Lydia B. Taghavi
Social Science Analyst,
Division of Program Monitoring and Research
Office of Policy Development and Research

AMERICAN OVERSIGHT

U.S. Department of Housing and Urban Development
451 Seventh Street S.W. Room 1826
Washington, DC 20410
202-402-5741 **Phone**
202-619-8360 **Fax**
lydia.b.taghavi@hud.gov **Email**

Vickie Kee
U.S. Census Bureau
CES/Research Support Area
HQ-6H117
4600 Silver Hill Road
Suitland, MD 20746
301-763-3071 **Phone**
301-763-6234 **Fax**
vickie.lynn.kee@census.gov **Email**

Sponsor
Amy OHara, Chief
U.S. Census Bureau
CARRA/Survey Applications Group
HQ-6H106B
4600 Silver Hill Road
Suitland, MD 20746
301-763- 5757 **Phone**
301-763-4310 **Fax**
amy.b.ohara@census.gov **Email**

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement will become effective when signed by all parties. The agreement will terminate on September 30, 2017, but may be amended at any time by mutual consent of the parties. The parties will review this agreement at least once every three years to determine whether it should be revised, renewed, or canceled.

Any party may terminate this agreement by providing 30 days' written notice to the other party. If the agreement is terminated, neither party shall be responsible for any costs incurred by the other party prior to the termination.

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000494

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

7. CONFIDENTIALITY

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence and to use the data for statistical purposes only in accordance with the provisions of Title 13, United States Code. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r3 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO as well as the Department of Commerce Office of Inspector General as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*." Security controls and subsequent assessments are done based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are reported within one hour to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau becomes aware of a known breach of HUD data, the Census Bureau will contact the identified HUD contacts to discuss the actions and potential remedies in regards to the incident.

8. APPROVALS

RL 4/17/12

Roderick Little — Date
Associate Director for Research and Methodology
U.S. Census Bureau

AMERICAN OVERSIGHT

4/2/12

Raphael W. Bostic
Date

Assistant Secretary for Policy Development and Research
U.S. Department of Housing and Urban Development

AMERICAN OVERSIGHT

Enclosure A

CY 2012-2017 Census Bureau File Specifications And Requirements For The Housing and Urban Development (HUD) Tenant Rental Assistance Certification System (TRACS)	
Geography:	National File
Reference Period:	All records entered or updated between: CY April 1, 2011-April 1, 2012 CY April 1, 2012-April 1, 2013 CY April 1, 2013-April 1, 2014 CY April 1, 2014-April 1, 2015 CY April 1, 2015-April 1, 2016 CY April 1, 2016-April 1, 2017
Delivery Date:	May 30, 2012 May 30, 2013 May 30, 2014 May 30, 2015 May 30, 2016 May 30, 2017
Data Sort:	Sort by most current ZIP Code
Data Variables:	**For Head of Household and All Other Members of the Household; All records including move outs and incomplete addresses:**
	• LAST_NAME • MIDDLE_I • FIRST_NAME • MEM_SSN • HEAD_SSN • BIRTH_DATE • SEX_CODE • RELATIONSHIP • RACE • ETHNICITY • CONTRACT_NUMBER • MOVING_DATE • PROJECT_NAME • PROJECT_NUMBER • CERTIFICATION_DATE • CERTIFICATION _TYPE • TRANSACTION_DATE • TRANSACTION_TYPE • TERMINATION_REASON

AMERICAN OVERSIGHT

	• ACTIVE_IND • CUURENT_IND • TOTAL_INCOME • SUDSIDY_TYPE • TOT_TENANT_PMT • CONTRACT_RENT • GROSS_RENT • STD_ADDRESS • STD_CITY • STD_STCD • STD_ZIP • FLAG • RACE_AMRIND_ALKNTV • RACE_ASIAN • RACE_BLCK_AFR_AMR • RACE_HAWAIIAN_PI • RACE_WHITE • RACE_OTHER
Special Instructions:	Please specify if Social Security Numbers were validated and describe validation process in accompanying documentation.
Transfer Media:	DVD (Encrypted) **(Please email Census Bureau Technical Contact Person with password)**
Format:	ASCII
Documentation:	• Please include a record layout, record count, block size, BPI, the latest data dictionary, and the name and telephone number of a technical advisor, if we should have questions. • Include responses required in special instructions.
Delivery Method:	Traceable Delivery Service (Federal Express, UPS, etc.)
Mark Shipment:	**HUD – TRACS File** **DVD - DO NOT X-RAY**
Mailing Addresses to Be Used for Shipments:	**(Please email at time of shipment)** Vickie Kee U.S. Census Bureau CES/Research Support Area CES HQ-6H117 4600 Silver Hill Road Suitland, MD 20746 Vickie.lynn.kee@census.gov ces.dpg.list@census.gov

AMERICAN OVERSIGHT

Census Bureau **Technical Contact Person:**	Vickie Kee 301-763-3071 301-763-3072 staff

AMERICAN OVERSIGHT

Enclosure B

CY 2012-2017 Census Bureau File Specifications and Requirements For The Housing and Urban Development (HUD) Public and Indian Housing Information Center (PIC)	
Geography:	National File
Reference Period:	All records entered or updated between: CY April 1, 2011-April 1, 2012 CY April 1, 2012-April 1, 2013 CY April 1, 2013-April 1, 2014 CY April 1, 2014-April 1, 2015 CY April 1, 2015-April 1, 2016 CY April 1, 2016-April 1, 2017
Delivery Date:	May 30, 2012 May 30, 2013 May 30, 2014 May 30, 2015 May 30, 2016 May 30, 2017
Data Sort:	Sort by most current ZIP Code
Data Variables:	**For Head of Household and All Other Members of the Household; All records including move outs and incomplete addresses:**
	See Attachments for list of requested variables: Attachment I -Member File Data Variable List Attachment II- Vacant File Data Variable List Attachment III- Not- Reported File Data Variable List
Special Instructions:	Please specify if Social Security Numbers were validated and describe validation process in accompanying documentation.
Transfer Media:	DVD (Encrypted) **(Please email Census Bureau Technical Contact Person with password)**
Format:	ASCII
Documentation:	Please include a record layout, record count, block size, BPI, the latest data dictionary, and the name and telephone number of a technical advisor, if we

AMERICAN OVERSIGHT

	should have questions.
Delivery Method:	Traceable Delivery Service (Federal Express, UPS, etc.)
Mark Shipment:	**HUD- PIC File** **DVD - DO NOT X-RAY**
Mailing Addresses to **Be Used for Shipments:**	**(Please email at time of shipment)** Vickie Kee U.S. Census Bureau CES HQ-6H117 4600 Silver Hill Road Suitland, MD 20746 Vickie.lynn.kee@census.gov ces.dpg.list@census.gov
Census Bureau Technical Contact Person:	Vickie Kee 301-763-3071 301-763-3072 staff

AMERICAN OVERSIGHT

Attachment I

CY 2012-2017 Member File Data Variable List

For The Housing and Urban Development (HUD)
Public and Indian Housing Information Center (PIC)

- MBR_LAST_NAME
- MBR_M_INITIAL
- MBR_FIRST_NAME
- SSN_HEAD
- SSN_MBR
- BIRTH_DATE
- MBR_AGE
- MBR_SEX
- MBR_ETHNICITY
- RELATIONSHIP
- WHITE_IND
- BLACK_IND
- A_INDIAN_ALASKAN_IND
- ASIAN_IND
- HAWAIIAN_PACIFIC_IND
- PROGRAM_TYPE
- DEVELOPMENT_CODE
- PROJECT_NAME
- TYPE_OF_ACTION
- PARICIPANT_CODE
- CERTIFICATION_DATE
- MOVING_DATE
- TOT_A_INCOME
- TTP(TOTAL_TENANT_PAYMENT)
- GROSS_RENT
- CONTRACT_RENT
- STD_ADDRESS
- STD_CITY
- STD_STCD
- STD_ZIP9
- ZIP_CODE_OLD
- FLAG
- VOUCHER_TYPE
- VOUCHER_SPL_PROGRAM_CODE
- BUILDING_NUMBER
- BUILDING_NUMBER_ENTRANCE
- OLD_DEVELOPMENT_CODE
- OLD_BUILDING_NUMBER

AMERICAN OVERSIGHT

Attachment II

CY 2012-2017 Vacant File Data Variable List For The Housing and Urban Development (HUD) Public and Indian Housing Information Center (PIC)
• DEVELOPMENT_CODE
• BUILDING_NUMBER
• BUILDING_NUMBER_ENTRANCE
• OLD_DEVELOPMENT_CODE
• OLD_BUILDING_NUMBER
• STD_ADDRESS
• STD_CITY
• STD_STCD
• STD_ZIP9
• ZIP_CODE_OLD
• PROGRAM_TYPE
• FLAG
• PROJECT_NAME
• MTW_FALG

AMERICAN OVERSIGHT

Attachment III

CY 2012-2017 Not-Reported File Data Variable List

For The Housing and Urban Development (HUD)
Public and Indian Housing Information Center (PIC)

- DEVELOPMENT_CODE
- BUILDING_NUMBER
- BUILDING_NUMBER_ENTRANCE
- OLD_DEVELOPMENT_CODE
- OLD_BUILDING_NUMBER
- STD_ADDRESS
- STD_CITY
- STD_STCD
- STD_ZIP9
- ZIP_CODE_OLD
- PROGRAM_TYPE
- FLAG
- PROJECT_NAME
- SSN_HEAD
- MTW_FALG

AMERICAN OVERSIGHT

MEMORANDUM OF UNDERSTANDING
BETWEEN THE
U.S. CENSUS BUREAU
AND
U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Agreement No: 0094-FY16-NFE-0068.000

I. PURPOSE:

The purpose of this No Funds Exchanged (NFE) Memorandum of Understanding (MOU) is to set forth the mutual understanding between the Department of Commerce, United States Census Bureau (Census Bureau) and the U.S. Department of Health and Human Services (HHS) to conduct a joint statistical project involving data from the Child Care and Development Fund (CCDF). Under this MOU, HHS will transfer confidential CCDF information to the Census Bureau. In turn, the Census Bureau will return to HHS tabulated CCDF data linked to Census Bureau data that meet Census Bureau disclosure avoidance standards. This tabulated data will help HHS develop better measures of the receipt of government transfer and assess the effects of the CCDF program on a variety of outcomes. The Census Bureau will benefit by using the CCDF data to improve its Title 13, U.S. Code (U.S.C.), authorized censuses and surveys.

II. BACKGROUND:

The Census Bureau's research project, Demonstration of Administrative Records Improving Surveys (DARIS), analyzes direct and indirect uses of administrative data to enhance survey data collection, processing, and analysis. DARIS builds upon over a decade of administrative data research projects benefitting State and Federal Agencies. The goal of the DARIS project is to improve survey frames, develop model-based edits and allocations, and evaluate data quality over time. The Census Bureau leverages data from Federal Agencies, State Agencies and private entities for the DARIS project.

III. LEGAL AUTHORITY:

A. The Census Bureau is authorized to enter into this MOU pursuant to 13 U.S.C. § 8(b), which allows the Census Bureau to engage in joint statistical projects with Federal and State Agencies on matters of mutual interest, upon equitable apportionment of costs. Additional authority is provided by 13 U.S.C., Section 6 which allows the Census Bureau to obtain information pertinent to the Census Bureau's Title 13 U.S.C. work from Federal and State Agencies.

B. HHS is authorized to enter into this MOU pursuant to 42 U.S.C. § 613(a) and 5 U.S.C. § 552a(b)(4), which authorize HHS to participate in research, evaluations, and national studies, particularly for the Census Bureau. HHS is further authorized

AMERICAN OVERSIGHT

to enter into this MOU by 42 U.S.C. § 9858g(a)(1), which authorizes the Secretary of HHS to coordinate all activities of HHS relating to child care and to coordinate such activities with similar activities of other Federal entities.

IV. CONFIDENTIALITY:

The CCDF data that HHS provides to the Census Bureau under this MOU are confidential under multiple federal statutes and regulations listed below:

Medicaid, 42 U.S.C. § 1396a (a)(7), 42 CFR § 431.300-307;
Temporary Assistance to Needy Families, 42 U.S.C. § 602 (a) (1) (A) (iv);
Supplemental Nutrition Assistance Program (SNAP), 7 U.S.C. § 2020(e)(8), 7 CFR § 272.1(c);
Social Security Act, 42 U.S.C. § 1396(a)(a)(7)
Social Security Administration Disclosure, 20 CFR Part 401;
Child Support, 42 U.S.C. § 654(26);
Public Assistance Programs (Public Welfare), 45 CFR § 205.50; and
U.S. Department of Labor Employment and Training Administration, 20 CFR Part 603.

The continued confidentiality of data once acquired by the Census Bureau is guaranteed under 13 U.S.C. § 9. The Census Bureau does not permit anyone other than sworn Census Bureau employees and Special Sworn Status (SSS) individuals to examine these data. The Census Bureau agrees that any information shared under this MOU will remain confidential, that no data under this MOU will be disclosed in individually-identifiable form, and that all uses will be solely for statistical purposes and not for purposes of enforcement.

Data transmitted to the Census Bureau will become a part of the Census Bureau's Statistical Administrative Records System (StARS) and is covered under the Census Bureau's System of Records Notice COMMERCE/CENSUS-8, StARS. As such, these records are subject to all requirements and conditions of the Privacy Act of 1974.

To the extent authorized by federal law: When the Census Bureau publicly releases information pursuant to this MOU, it shall not identify any individual or business entity and all results will have met the Census Bureau disclosure avoidance guidelines. Full Title 13 confidentiality is provided to protect the identities of individuals in all items derived from program data until the data are destroyed.

Both parties acknowledge that substantial penalties exist for wrongful disclosure of CCDF information provided under this MOU:

A. Unauthorized disclosure of the information provided under this agreement may violate the terms of 13 U.S.C. § 9; 42 U.S.C. § 1306; 5 U.S.C. § 552a; and 44 U.S.C. § 3501. In the event of inconsistency, the parties agree that the most restrictive provisions of these statutes will apply in determining what constitutes an unauthorized disclosure.

AMERICAN OVERSIGHT

B. The penalties stipulated for wrongful disclosure in 13 U.S.C. § 214; 42 U.S.C. § 1306; 5 U.S.C. § 552a; and 44 U.S.C. § 3501 may include imprisonment for up to five years, a fine, or both.

C. Knowingly and willfully disclosing or obtaining records(s) under false pretenses may also violate provisions of 5 U.S.C. § 552a, resulting in penalty. Taking or converting records(s) to one's own use or receiving the file(s) knowing they were stolen or converted may violate 18 U.S.C. § 641, resulting in penalty.

By signing this MOU, the Census Bureau agrees to abide by all provisions set out in this MOU for protection of all information contained in the data file(s) specified in Section VI and acknowledges having received notice of potential criminal, administrative, or civil penalties for violation of the applicable laws supporting the terms of the MOU.

V. SCOPE OF THE WORK:

The term "CCDF data" in this document refers to all data records included on the ACF-801 dataset maintained by HHS. The ACF-801 data includes program information about families that received assistance from CCDF and related child care programs.

Under this MOU, the Census Bureau will link the CCDF data with other records at the Census Bureau, including but not limited to data from the Temporary Assistance for Needy Families (TANF); survey data including the Survey of Income and Program Participation (SIPP), the Current Population Survey (CPS), and the American Community Survey (ACS); decennial census data; and other administrative records sources.

These linkages will be accomplished using a unique linkage identifier called a Protected Identification Key (PIK). After the PIK process, direct identifiers will be removed from the linked files. Processing to assign a PIK to each person record involves matching using Social Security Numbers (SSN). The validation and PIK process is robust and has been used by other internal and external Census Bureau research projects. Only Census Bureau staff conducting the record linkage will have access to files with the direct identifiers, and access to the PIK'ed files will be limited to those with a need to know.

The Census Bureau benefits in that it will use these linked data to improve the quality of the censuses and surveys that it conducts. For example, the Census Bureau uses reported child care payment data in its supplemental poverty measures and it uses self-reported child care data from the Survey of Income and Program Participation in its "Who's Minding the Kids" reports. Linking the CCDF child care subsidy data to Census Bureau surveys can help the Census Bureau compare the reported data with administrative data.

The Census Bureau and HHS will analyze CCDF data and gain understanding of within-state dynamics and program changes that could affect the data and linkage results. The joint project will evaluate survey reports of program participation with administrative

AMERICAN OVERSIGHT

data to inform users of data quality and to improve edit and allocation programs for demographic surveys. The CCDF data will be used in combination with existing data assets to create new analyses and products.

The data contained in the linked files are to be used only for the statistical research described in Attachment A. New projects may be initiated in writing to HHS and the Census Bureau Data Custodian for review and written approval by both agencies throughout the term of this MOU. New projects must include a description of the project and Title 13 benefits to the Census Bureau. All new projects and any modifications, expansions, or enhancements to existing projects that are approved will be subject to all of the terms and conditions of this MOU.

VI. RESPONSIBILITIES OF THE PARTIES:

A. The Census Bureau:

1. The Census Bureau staff may access the CCDF data, in original form or when commingled or integrated, only for approved projects (Attachment A).

2. The Census Bureau will be permitted access to CCDF records for 2004 through 2010, subsequent years as they become available, and continued use of previously submitted data.

3. The Census Bureau will provide progress reports to HHS on these projects annually. New project proposals or extensions of current research will be provided to HHS in these progress reports. HHS concurrence is required prior to the use of linked data for new projects.

4. The Census Bureau will integrate the CCDF data into the Census data infrastructure. The Census Bureau will retain the integrated CCDF data under this MOU indefinitely.

5. Census Bureau will send HHS publications and presentations, HHS will review and provide comments within fifteen (15) days for presentations, and thirty (30) days for publications for Census Bureau consideration. If comments are not provided within the days allotted for review, concurrence is assumed.

6. All data, records, data elements, and any other information collected, gathered, obtained, or otherwise received by the Census Bureau under this MOU shall be protected from unauthorized disclosure. All information regarding recipients is confidential, and the Census Bureau shall follow the appropriate requirements to maintain the confidentiality of information concerning CCDF recipients. Any violations of this provision or the provisions of the federal statutes listed above shall be considered cause for immediate termination of this MOU.

AMERICAN OVERSIGHT

7. Data acquired under this MOU may be accessed in the Census Bureau's Research Data Centers (RDCs) using the Census Bureau's standard data protection processes. Access to the anonymized analytical data files covered by this MOU shall be limited to the minimum number of individuals necessary to achieve the purpose stated in this section and will include Title 13, U.S.C., Section 23(c) Special Sworn Status (SSS) researchers participating in the project at Census Bureau RDCs.

B. HHS:

1. HHS will prepare and forward CCDF data (2004 through 2010) to the Census Bureau, via an Electronic Delivery Transmission (EDT). Additional years of data may be transferred when they are available.

2. HHS will provide record layouts of CCDF data (2004 through 2010) and data dictionaries with the initial delivery and subsequent years of data delivery (Attachment B).

3. HHS will provide analytic support that will:

   a. Assist the Census Bureau in the interpretation of the CCDF.
   b. Inform HHS about program participation and how within-state dynamic and program changes could affect the data and linkage results.

4. When the Census Bureau sends HHS pre-publication copies of publications, reports or other documents that contain summaries or aggregations, HHS will review and provide comments within ten (15) business days for Census Bureau consideration. If comments are not provided within 15 business days, concurrence is assumed.

5. By delivering CCDF data, HHS gives the Census Bureau the right to retain and use the data files indefinitely for approved projects. Once data are entered into the Census Bureau administrative data system and joined to microdata from other sources, all records are considered Title 13 data.

6. Research projects based on the source dataset(s) described in Section V of this MOU must be approved in advance by the Census Bureau and HHS through the use of the Research Proposal template shown in Attachment C. Once either party submits a research proposal, the other party has ten (10) business days to notify the submitting party of their: approval; approval with edits; or, disapproval of the proposal. If no response is provided within ten (ten) business days, concurrence is assumed.

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000509

VII. EQUITABLE APPORTIONMENT OF COSTS:

The costs associated with this MOU are equitably apportioned. The Census Bureau will provide 1.25 FTE to enhance matching algorithms, develop metadata and match the CCDF data to existing data assets. HHS will provide 1.0 FTE with Special Sworn Status (SSS) for research support on the CCDF data and linked survey-administrative data.

VIII. DURATION AND FUNDING:

This MOU will be effective on the date on which it is signed by both parties. The term of this MOU will terminate five (5) years following the date on which it becomes effective. If at the end of five (5) years, the parties wish to continue the relationship, they should execute a new MOU.

Notwithstanding all other provisions of this MOU:

A. This MOU may be amended at any time by written mutual consent of both parties.

B. Either party may terminate this MOU upon thirty (30) days written notice to the other party.

Upon expiration or termination of this MOU, the Census Bureau staff and SSS researchers will cease and desist all use of the CCDF data until such time that a new MOU is executed which permits the use of the CCDF data by Census Bureau staff and/or SSS researchers. The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the CCDF data will not be discontinued due to the expiration or termination of the MOU.

If, upon expiration or termination of this MOU, HHS notifies the Census Bureau POC in writing that the CCDF data covered by this MOU are not to be retained by the Census Bureau, the data will be expunged from Census Bureau systems.

This MOU does not itself authorize the expenditure or reimbursement of any funds. Nothing in the MOU obligates the parties to expend appropriations or enter into any contract or other obligations.

IX. DATA MANAGEMENT AND SECURITY:

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence and to use the data for statistical purposes only in accordance with the provisions of Title 13, United States Code. Upon receipt, all data acquired as a result of this MOU will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with the National Institute of Standards and Technology (NIST) Federal Information Processing Standards (FIPS) 200 and Special Publication 800-60r1.

AMERICAN OVERSIGHT

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "Recommended Security Controls for Federal Information Systems and Organizations," as well as Special Publication 800-37r1 "Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO as well as the Department of Commerce Office of Inspector General as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "Standards for Security Categorization of Federal Information and Information Systems" and NIST Special Publication 800-60r1 "Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices." Security controls and subsequent assessments are done based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are reported within one hour to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau becomes aware of a known breach of HHS data, the Census Bureau will contact the identified HHS contacts to discuss the actions and potential remedies in regards to the incident.

X. POINT OF CONTACT:

The following named individuals are designated as points of contact for the MOU on behalf of HHS and the Census Bureau:

HHS Points of Contact:

Andrew Williams
Policy Division Director
Office of Child Care
Administration for Children and Families
U.S. Department of Health and Human Services
Phone: (202) 401-4795
Email: andrew.williams@acf.hhs.gov

Robin Ghertner
Director of Data and Technical Analysis
Office of the Human Services Policy
U.S. Department of Health and Human Services
Phone: (202) 690-6939
Email: robin.ghertner@hhs.gov

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000511

Census Bureau Points of Contact:

Michael Berning
Center for Administrative Records Research and Applications
U.S. Census Bureau
Phone: (301) 763-2028
Fax: (301) 763-4310
Email: michael.a.berning @census.gov

XI. DISPUTE RESOLUTION:

If disagreements arise on the interpretation of the provisions of this MOU, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to the respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, Title 5 U.S.C. App. 3, a review of this MOU may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, shall have access to any pertinent books, documents, papers and records of the parties to this MOU, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

Nothing herein is intended to conflict with current U.S. Census Bureau, Department of Commerce or HHS directives. If the terms of this MOU are inconsistent with existing directives of either of the agencies entering into this MOU, then those portions of this MOU which are determined to be inconsistent shall be invalid; but the remaining terms and conditions not affected by the inconsistency shall remain in full force and effect. At the first opportunity for review of the MOU, all necessary changes will be accomplished by either an amendment to this MOU or by entering into a new MOU, whichever is deemed expedient to the interest of both parties.

AMERICAN OVERSIGHT

XII. SIGNATURES:

On behalf of the Census Bureau:

11/10/2017

John Thompson (Date)
Director
U.S. Census Bureau

On behalf of HHS:

Ellen C Wheatley, PhD 1/25/17

~~**Rachel Schumacher**~~ Ellen C Wheatley, PhD (Date)
Acting **Director, Office of Child Care**
U.S. Department of Health and Human Services

AMERICAN OVERSIGHT

Attachment A

Census Bureau's Description of Approved Projects

1. **Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records**

   The U.S. Census Bureau administers multiple household surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

   This project will focus on evaluating and improving the measurement of state programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

   This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. **Characterizing likely eligible non-participants of SNAP**

   Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state

AMERICAN OVERSIGHT

agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. **Improve Census Bureau Record Linkage Methods**

The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. **Research, Testing and Operations for the 2020 Census**

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

A. validating and enhancing the Master Address File (MAF);[1]
B. designing and assigning resources to carry out the 2020 Census;[2]
C. unduplicating public, private, and census lists; and
D. imputing missing data.[3]

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as

1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.
2 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.
3 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

AMERICAN OVERSIGHT

well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. **Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes**

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

AMERICAN OVERSIGHT

Attachment B

HHS Child Care and Development Fund Description of Approved Projects

1. Characterizing likely eligible non-participants of child care subsidies

Persons with a high probability of being eligible for child care subsidies can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative CCDF data to determine who participated in the program. This research will also use the ACS data to determine the employment status and incomes of adults before and after they participate in the child care subsidy programs. This research is important for the Census Bureau as it permits a greater understanding of whether child care subsidies take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research is important for HHS because it will determine which populations are not participating in child care subsidy programs even though they are eligible.

2. Supplemental poverty measurement of child care subsidy recipients

Since funding for child care subsidies is usually capped each fiscal year, researchers and practitioners have an interest in knowing whether child care subsidy programs are targeting benefits to the neediest populations. Previous research has often explored this topic using the official poverty measure. However, there remains an interest in knowing the poverty status of recipients using the Supplemental Poverty Measure (SPM), which is meant to be an improved measure of the poor. This project merges CCDF administrative records with data from the Current Population Survey (CPS) to examine the SPM poverty status of participating families.

The CPS collects data on the amount that families pay for out-of-pocket child care expenses. The CCDF data reports the amount of money that the government pays for subsidy child care arrangements and the amount paid by participating subsidies. This project will benefit the Census Bureau because it will allow a comparison of out-of-pocket expenses reported on CCDF administrative records to what is reported in the survey data from the CPS. HHS will benefit from this project because it will provide new information regarding the economic well-being of families using a contemporary measurement of the poor.

AMERICAN OVERSIGHT

Attachment C

Record Layouts

ACF-801 Child Care and Development Fund Data FY 2004 – FY 2010

FAMILY

Variable Name	Data Type	Description (also see Technical Bulletin 3) http://www.acf.dhhs.gov/programs/ccb/report/formhelp/techbull/tb03r.htm
Family_ID	Numeric	Unique identifier for family records within Report Month
ACF_801_File_ID	Numeric	Unique identifier for ACF-801files submitted by Grantees.
SRpt_Year_Mo	Numeric	Year/month of report period (from Summary Record) in YYYYMM format.
Unique_Case_Id	String	Unique State Case ID (Encrypted)
SSN	String	SSN (Encrypted)
FIPS	Numeric	5-digit (State-County) FIPS
Single_Pt	Numeric	Is head of household a single parent? (1=Yes, 0=No, 9= Child Head of Household)
Reason	Numeric	Reason for receiving subsidized child care (1 = Employment, 2 = Education/Training, 3 = Employment and Education/Training, 4 = Protective Services, 5 = Other)
CoPay	Numeric	Total monthly co-payment by family
Start_Date	Numeric	Year/Month child care assistance started in YYYYMM format.
Income	Numeric	Total monthly income for determining eligibility
Employment	Numeric	Income source: Employment, including self-employment (1=Yes, 0=No)
TANF	Numeric	Income source: Title IV of the Social Security Act (TANF) (1=Yes, 0=No)
State_MOE	Numeric	Income source: State program for which state spending is counted towards TANF MOE (1=Yes, 0=No)
Housing	Numeric	Income source: Housing voucher or cash assistance (1=Yes, 0=No)
Food_Stamps	Numeric	Income source: Assistance under the Food Stamps Act of 1977 (1=Yes, 0=No)
Other_Fed	Numeric	Income source: Other Federal Cash Income (1=Yes, 0=No)
Family_Size	Numeric	Number of family members upon which eligibility is based

CHILD

Field Name	Data Type	Description
Child_ID	Numeric	Unique identifier for children records within Report Month
Family_ID	Numeric	Unique Identifier for family records within Report Month
Latino	Numeric	Ethnicity: Is child Hispanic or Latino? (1=Yes, 0=No)
Native	Numeric	Race: Is child American Indian or Alaskan Native? (1=Yes, 0=No)
Asian	Numeric	Race: Is child Asian? (1=Yes, 0=No)
Black	Numeric	Race: Is child Black or African American? (1=Yes, 0=No)
P_Islander	Numeric	Race: Is child Native Hawaiian or Pacific Islander? (1=Yes, 0=No)
White	Numeric	Race: Is child White? (1=Yes, 0=No)

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000518

Gender	Numeric	Gender (1=Male 2=Female)
DOB_YearMo	Numeric	Year and Month of Child's Birth in YYYYMM format
SETTING		
Field Name	**Data Type**	**Description**
Setting_ID	Numeric	Unique identifier for setting records within Report Month
Child_ID	Numeric	Unique identifier for children records within Report Month
Care_Type	Numeric	Type of child care setting (1 = Licensed In Home, 2 = Licensed Family, 3 = Licensed Group Home, 4 = Licensed Center, 5 = Legal In Home by Non-Relative, 6 = Legal In Home by Relative, 7 = Legal Family by Non-Relative, 8 = Legal Family by Relative, 9 = Legal Group Home by Non-Relative, 10 = Legal Group Home by Relative, 11 = Legal Center)
Cost	Numeric	Total amount paid to provider during reporting month (includes Copay)
Hours	Numeric	Total number of hours child received care in setting during reporting month
SUMMARY		
Field Name	**Data Type**	**Description**
ACF_801_File_ID	Numeric	Unique identifier for ACF-801files submitted by Grantees.
NumFams	Numeric	The unadjusted number of families served during the reporting month (see Technical Bulletin # 4, http://www.acf.dhhs.gov/programs/ccb/report/formhelp/techbull/tb04r.htm)
PreK	Numeric	Estimated Count of Children Served with Pre K State MOE/Match
SRpt_Year_Mo	Numeric	Month/year of report period in YYYYMM format same as in Family File Month being reported.
State_Code	Numeric	Two-Digit State Code
POOLING		
Field Name	**Data Type**	**Description**
State_Code	String	Two-Digit State Code
Pooling	Numeric	Percentage or ratio of child care funds that are provided by CCDF relative to all subsidized child care funding for families reported on the ACF-801. For nearly all Grantees, the ACF-800 and the ACF-801 report on the same universe of families and children and thus the pooling reported on the ACF-800 is applicable to the ACF-801. See Technical Bulletin #1. http://www.acf.dhhs.gov/programs/ccb/report/formhelp/techbull/tb01r-2.htm data element 17 and 18.
FFY	Numeric	Fiscal year of pooling factor

AMERICAN OVERSIGHT

Attachment D
Research Proposal Form
Center for Administrative Records
Research and Applications

Instructions: **Please fill out this form and submit it to your branch chief. After the branch chief reviews and approves, the branch chief will submit to the Assistant Center Chief (ACC) for Research. After ACC approval, the ACC will submit to the CARRA Center Chief for approval. Please save this document in a folder named "Paper Proposal" within the folder structure of your paper. When the proposal has been approved by all parties, please save this as "Paper Proposal Approved" and put all prior versions of this document in a folder named "Previous Versions" within the "Paper Proposal" folder. Please update this document when you have completed a working paper, submitted to a journal, and when you have published the paper.**

---

1) Date

2) Title/Abstract

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000520

3) Author(s) and Affiliation(s)

4) Data Sources (include years and specific information about the file – i.e. swapped or unswapped data)

AMERICAN OVERSIGHT

5) Planned Methodology

AMERICAN OVERSIGHT

6) Census Bureau Benefit

7) Contribution to the Literature

8) Planned Start Date

9) Expected Conference Submissions and Dates

10) Expected Date for CARRA Working Paper

11) Name of Expected Journal Submission

12) Proposed Arts (DMS) Project

AMERICAN OVERSIGHT

13) If external co-author, how will work be completed?

14) Is this sponsored research or independent research? If sponsored, please provide the name of the sponsor and attached a proposed schedule to complete the work.

15) Additional Information/Notes

16) Approvals

_____

Branch Chief Approval – Signature and Date

_____

Assistant Center Chief Approval – Signature and Date

_____

Center Chief Approval – Signature and Date

AMERICAN OVERSIGHT

17) Actual CARRA Working Paper Completion Date

18) Publication Submission Date(s) and Name(s) of Journals

19) Name of Journal in which Work is Published

20) If data access was granted to external co-author(s), has their access to the data been terminated?

21) Location of final presentations and paper

22) Location of programs

AMERICAN OVERSIGHT

AMERICAN OVERSIGHT

BOC IAA Number: 0094-2011-NFE-7515A

Modification to the Interagency Agreement between the U.S. Census Bureau and U.S. Department of Health and Human Services 0094-FY13-NFE-0003.001

I. PURPOSE:

The purpose of this no-cost agreement is for the Office of Family Assistance (OFA) of the Administration of the United States Department of Health and Human Services (HHS) to provide the United States Census Bureau (Census Bureau) with Temporary Assistance for Needy Families (TANF) recipient information. Under this agreement, HHS will transfer confidential TANF information to the Census Bureau. In turn, the Census Bureau will return tabulated TANF data to HHS upon request that will help HHS develop better measures of poverty, inequality, the receipt of government transfers, and the effects of state programs on a variety of outcomes. The Census Bureau will benefit by using the TANF data to improve its Title 13, U.S. Code (U.S.C.), authorized censuses and surveys.

II. BACKGROUND:

The Census Bureau's Longitudinal Employer-Household Dynamics (LEHD) program combines federal and state administrative data on employers and employees with core Census Bureau censuses and surveys to develop new data products, to improve the quality and understanding of survey products, and to facilitate research on the state of the economy and the nation. The goal of the LEHD program is to build a longitudinal national frame of jobs with an associated data infrastructure to support rapid production of timely, rich results. The present infrastructure includes the history and characteristics for each worker and each employer covered under the state unemployment insurance wage record system for participating states.

The Census Bureau's Demonstration of Administrative Records Improving Surveys (DARIS) research project analyzes direct and indirect uses of administrative data to enhance survey data collection, processing, and analysis. DARIS builds upon ten years of administrative data research projects benefitting State and Federal Agencies including the Medicaid Undercount Project and Earned Income Participation Rate Project. The goal of the DARIS project is to improve survey frames, develop model-based edits and allocations, and evaluate data quality over time. The Census Bureau entered into these projects with collaborating agencies pursuant to the Census Bureau's authority under 13 U.S.C., Section 8(b); no confidential Title 13, U.S.C. data were provided to the collaborating agencies.

Both HHS and the Census Bureau would like to build on the successes of the LEHD and DARIS projects through national TANF data analyses. Sharing data with the Census Bureau will permit analyses of demographic characteristics and labor market outcomes of TANF recipients. Understanding variations in participation across demographics and

AMERICAN OVERSIGHT

states will directly benefit state and federal program managers. Data sharing and analysis of linked files under this agreement are solely for statistical purposes, not for enforcement purposes.

The TANF data are and will remain confidential, whether in their original form or when commingled or linked under this agreement, as explained in Section IV.

III. LEGAL AUTHORITY:

A. The Census Bureau is authorized to enter into this agreement pursuant to 13 U.S.C., Section 8(b), which allows the Census Bureau to engage in joint statistical projects with Federal and State Agencies on matters of mutual interest, upon equitable apportionment of costs. Additional authority is provided by 13 U.S.C., Section 6 which allows the Census Bureau to obtain information pertinent to the Census Bureau's Title 13 U.S.C. work from federal and State Agencies.

B. HHS is authorized to enter into this agreement pursuant to 42 U.S.C., Sections 613 and 614, which authorize the HHS to participate in research, evaluations, and national studies, particularly for the Census Bureau. Additional information can be found in the amended Systems of Record Notice, 09-90-0151; Federal Register Vol. 69, No. 115, June 16, 2004.

IV. CONFIDENTIALITY:

The TANF data that HHS provides to the Census Bureau under this agreement are confidential under multiple federal statutes and regulations listed below:

Medicaid, 42 U.S.C., Section 1396a (a)(7), 42 CFR Part 431.300-307;
Temporary Assistance to Needy Families, 42 U.S.C., Section 602 (a) (1) (A) (iv);
Supplemental Nutrition Assistance Program (SNAP), 7 U.S.C., Section 2020(e)(8), 7 CFR Part 272.1(c);
Social Security Act, 42 U.S.C., Section 1396(a)(a)(7)
Social Security Administration Disclosure, 20 CFR Part 401;
Child Support, 42 U.S.C., Section 654(26);
Public Assistance Programs (Public Welfare), 45 CFR Part 205.50; and
U.S. Department of Labor Employment and Training Administration, 20 CFR Part 603.

The continued confidentiality of data once acquired by the Census Bureau is guaranteed under 13 U.S.C., Section 9. The Census Bureau agrees that any information shared under this agreement will remain confidential, that no data under this agreement will be disclosed in individually-identifiable form, and that all uses will be solely for statistical purposes and not for purposes of enforcement.

Data transmitted to the Census Bureau will become a part of the Census Bureau's Statistical Administrative Records System (StARS) and is covered under the Census

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000528

Bureau's System of Records Notice COMMERCE/CENSUS-8, StARS. As such, these records are subject to all requirements and conditions of the Privacy Act of 1974.

To the extent authorized by federal law: When the Census Bureau publicly releases information pursuant to this agreement, it shall not identify any individual or business entity and all results will have met the Census Bureau disclosure avoidance guidelines. Full Title 13 confidentiality is provided to protect the identities of individuals in all items derived from program data until the data are destroyed. The Census Bureau agrees to allow data providers the ability to verify that findings, listings, information derived, or any combination of data extracted or derived from the program data properly protects the identities of individuals according to the standards applicable to Title 13 data.

Both parties acknowledge that substantial penalties exist for wrongful disclosure of TANF information provided under this agreement:

A. Unauthorized disclosure of the information provided under this agreement may violate the terms of 13 U.S.C., Section 9; 42 U.S.C., Section 1306; 5 U.S.C., Section 552a; and 44 U.S.C., Section 3501. In the event of inconsistency, the parties agree that the most restrictive provisions of these statutes will apply in determining what constitutes an unauthorized disclosure.

B. The penalties stipulated for wrongful disclosure in 13 U.S.C., Section 214; 42 U.S.C., Section 1306; 5 U.S.C., Section 552a; and 44 U.S.C., Section 3501 may include imprisonment for up to five years, a fine, or both.

C. Knowingly and willfully disclosing or obtaining records(s) under false pretenses may also violate provisions of 5 U.S.C., Section 552a, resulting in penalty. Taking or converting records(s) to one's own use or receiving the file(s) knowing they were stolen or converted may violate 18 U.S.C., Section 641, resulting in penalty.

By signing this agreement, the Census Bureau agrees to abide by all provisions set out in this agreement for protection of all information contained in the data file(s) specified in Section VI and acknowledges having received notice of potential criminal, administrative, or civil penalties for violation of the applicable laws supporting the terms of the agreement.

V. SCOPE OF THE WORK:

Under this agreement, the Census Bureau will link the TANF data with other records at the Census Bureau, including but not limited to data from the Longitudinal Employer-Household Dynamics (LEHD) database, State Unemployment Insurance Wage records, and survey data including the Survey of Income and Program Participation (SIPP), the Current Population Survey (CPS), and the American Community Survey (ACS).

AMERICAN OVERSIGHT

This linkage will be accomplished using a unique linkage identifier called a Protected Identification Key (PIK). After the PIK process, direct identifiers will be separated from the linked files. Processing to assign a PIK to each person record involves matching using name, address, sex, date of birth, and Social Security Number (SSN) data, as available. The validation and PIK process is robust and has been used by other internal and external Census Bureau research projects. Only Census Bureau staff conducting the record linkage will have access to files with the direct identifiers, and access to the PIK'ed files will be limited to those with a need to know.

Research projects exploring whether the administrative records represent the same individuals in survey or census households may need access to name data. Such access would only be granted through approval by the Census Bureau Data Stewardship Executive Policy Committee. Researchers would not have access to Social Security Numbers.

The Census Bureau benefits in that it will use these linked data to improve the quality of the censuses and surveys that it conducts. The data contained in the linked files are to be used only for the statistical projects described in the Attachment A. New projects may be initiated in writing to HHS and the Census Bureau Data Custodian for review and written approval by both agencies throughout the term of this agreement. New projects must include a description of the project, Title 13 benefits to the Census Bureau, and the specific individuals who will be involved in the research. All new projects and any modifications, expansions, or enhancements to existing projects that are approved will be subject to all of the terms and conditions of this agreement.

HHS will benefit in that the Census Bureau will produce tabulated TANF data that can be used by HHS to improve program administration for the TANF programs.

VI. RESPONSIBILITIES OF THE PARTIES:

A. The Census Bureau agrees:

1. The Census Bureau staff may access the TANF data, in original form or when commingled or integrated, only for approved projects.

2. The Census Bureau will be permitted access to the SSN of all adult TANF recipients for 2007 through 2010, subsequent years as they become available and continued use of 2000 and 2002-2006 data.

3. The Census Bureau will provide progress reports to HHS on these projects annually. New project proposals or extensions of current research will be provided to HHS in these progress reports. HHS concurrence is required prior to the use of linked data for new projects.

4. The Census Bureau may integrate the TANF data into the Census LEHD microdata. The Census Bureau will retain the integrated TANF data under this agreement indefinitely. By delivering TANF data, HHS gives the Census Bureau

AMERICAN OVERSIGHT

the right to retain and use the data files indefinitely. Once data are entered into the Census Bureau administrative data system and joined to microdata from other sources, all records are considered to be Title 13 data.

5. Selected tabulations developed in the project from the matched survey and administrative data files may be requested by HHS for evaluation of TANF participation and transitions. Such tabulations will be aggregated sufficiently to guarantee survey respondent and TANF participant confidentiality.

6. All Census Bureau research reports made possible using data from this project will be provided to HHS. At the completion of the project, the Census Bureau will deliver a summary of project outputs including reports, articles, and conference presentations to HHS.

7. All data, records, data elements, and any other information collected, gathered, obtained, or otherwise received by the Census Bureau under this agreement shall be protected from unauthorized disclosure. All information regarding recipients is confidential, and the Census Bureau shall follow the appropriate requirements to maintain the confidentiality of information concerning TANF recipients. Any violations of this provision or the provisions of the federal statutes listed above shall be considered cause for immediate termination of the data sharing agreement.

8. Data acquired under this agreement may be accessed in the Census Bureau's Research Data Centers (RDCs) using the Census Bureau's standard data protection processes. Access to the anonymized analytical data files covered by this agreement shall be limited to the minimum number of individuals necessary to achieve the purpose stated in this section and will include Title 13, U.S.C., Section 23(c) Special Sworn Status (SSS) researchers participating in the project at Census Bureau RDCs.

B. HHS agrees:

1. To prepare and forward TANF data (2007 through 2010) to the Census Bureau, on CD ROM that is FIPS 140-2 compliant (i.e., encrypted and password protected CD ROM) via Private Courier Service (e.g., FedEx, UPS). The password will be verbally relayed to the Census Bureau Point of Contact.

2. To prepare and forward subsequent years of TANF data to the Census Bureau as they become available via Secure File Transfer Protocol (SFTP) and assigning a user ID and password.

3. To provide ASCII record layouts and record counts of TANF data (2007 through 2010) and data dictionaries with the initial and subsequent years of delivery (Attachment B).

4. When the Census Bureau sends HHS pre-publication copies of publications,

AMERICAN OVERSIGHT

reports, or other documents that contain summaries or aggregations, HHS agrees to review and provide comments and clearance or rejection within thirty (30) days. If no response is received within this period, the Census Bureau shall send a reminder notice. If no response is received within three (3) business days, HHS will be deemed to have approved the publication and/or distribution to persons outside of authorized staff under this agreement.

VII. DURATION AND FUNDING:

This agreement is effective on the date signed by both parties. The term of this agreement is five years; however, if at the end of five years, the parties wish to renew the agreement, they should execute a new agreement signed by appropriate agency officials.

This agreement must be formally reviewed whenever a Federal statute is enacted that materially affects the substance of the agreement. The review will be conducted by the Census Bureau Associate Director and at the Director level at HHS. The result of the review will be a decision agreed to by both agencies to continue the agreement unchanged, amend the agreement, or cancel the agreement. Any amendments to the agreement will require the review and approval at the Director level at HHS and the Associate Director level at the Census Bureau.

The costs of this agreement are equitably apportioned between the parties to this agreement. No funds will be transferred as a result of this agreement between HHS and the Census Bureau; however, the parties believe that their contributions are roughly equivalent. The value of the Census Bureau analysis to produce a research report is approximately $60,000. Other agencies face an average cost of $75,000 to deliver administrative data extracts to the Census Bureau. The Census Bureau's estimated percentage of total in-kind costs of this project are 45% and HHS's estimated percentage total of in-kind costs of this project are 55%.

This agreement may be terminated by either agency upon a 30-day advance written notice.

VIII. DATA MANAGEMENT AND SECURITY:

The Census Bureau assumes an obligation to keep all data received from other agencies in confidence and to use the data for statistical purposes only in accordance with the provisions of Title 13, United States Code. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, Title 13 protection.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r3 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000532

Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach.*" The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO as well as the Department of Commerce Office of Inspector General as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*". Security controls and subsequent assessments are done based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are reported within one hour to the US CERT. Once the Census Bureau becomes aware of a known breach of HHS/Center for Medicare & Medicaid Services (CMS)/ Assistant Secretary for Planning and Evaluation (ASPE) data, the Census Bureau will contact the identified HHS/CMS/ASPE contacts to discuss the actions and potential remedies in regards to the incident.

IX. DATA CUSTODIAN:

The parties mutually agree that the following named individual is designated as "Custodian" of the files on behalf of the Census Bureau and will in a representative capacity comply with all of the designated provisions of this agreement on behalf of the Census Bureau, including observance of conditions of use and establishment and maintenance of security agreements as specified in the agreement to prevent unauthorized use. The Census Bureau agrees to notify HHS within fifteen (15) days of any changes of custodianship.

Custodian:

J. Trent Alexander
U.S. Census Bureau
4600 Silver Hill Road, 2K133
Washington DC 20233
(301) 763-9810
j.trent.alexander @census.gov

AMERICAN OVERSIGHT

X. POINT OF CONTACT:

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of HHS and the Census Bureau:

HHS Point of Contact:

Susan Golonka
Deputy Director, Office of Family Assistance (OFA)
Acting Division Director, Division of Data Collection and Analysis
Administration for Children and Families
U.S. Department of Health and Human Services
(202) 401-4731
susan.golonka@acf.hhs.gov

Census Bureau Point of Contact:

J. Trent Alexander, Data Custodian
U.S. Census Bureau
4600 Silver Hill Road, 2K133
Washington DC 20233
(301) 763-9810
j.trent.alexander @census.gov

XI. DISPUTE RESOLUTION:

Nothing in this agreement is intended to conflict with current Census Bureau or HHS directives. If the terms of this agreement are inconsistent with existing directives of either party, then those portions of this agreement which are determined to be inconsistent shall be invalid, but the remaining terms and conditions not affected by the inconsistency shall remain in full force and effect. At the first opportunity for review of the agreement, all necessary changes will be accomplished either by an amendment to this agreement or by entering into a new agreement, whichever is deemed expedient to the interest of both parties.

Disputes shall be resolved pursuant to applicable provisions of the Business Rules for Intragovernmental Transactions delineated in the Treasury Financial Manual, Vol. 1, Bulletin 2007-03, Section VII (Resolving Intragovernmental Disputes and Major Differences).

AMERICAN OVERSIGHT

XII. SIGNATURES:

On behalf of the Census Bureau, the undersigned individual hereby attests that he or she is authorized to enter into this agreement and agrees to all the terms specified herein.

Thomas A Louis 10/17/15

Thomas Louis (Date)
Associate Director for Research and Methodology
U.S. Census Bureau

On behalf of HHS, the undersigned individual hereby attests that he or she is authorized to enter into this agreement and agrees to all the terms specified herein.

Susan Golonka 9-25-2015

Susan Golonka (Date)
Deputy Director, Office of Family Assistance
U.S. Department of Health and Human Services

AMERICAN OVERSIGHT

Attachment A

Census Bureau's Description of Approved Projects

1. **Longitudinal Employer-Household Dynamics (LEHD) Analysis**

The LEHD program combines data from the Economic Directorate with that of the Demographic Directorate by means of linking administrative, census, and survey records for individuals and businesses. This project has linked TANF data for almost all states for 2000 and 2002-2006 to data used in the LEHD program. This project will use employer data, unemployment insurance wage data, and the person characteristics based on modeled and SSA Numident data to track employment and wage outcomes for those who have received TANF. Linked TANF data for this project are covered under the Census Bureau's System of Record Notice (SORN) CENSUS-9, Longitudinal Employer-Household Dynamics System, as well as under the Census Bureau's SORN CENSUS-8, Statistical Administrative Records System.

Of particular interest to this project are individuals who left TANF, especially their demographic and employment characteristics. Some characteristics may be compared to those who continue to receive benefits or a reference group of individuals who never received TANF. This project may analyze employment and earnings outcomes of individuals who left TANF. These analyses will be based on merging data on TANF recipients to Unemployment Insurance (UI) wage data. We may examine quarterly and annual measures, such as the percent of leavers employed and fuzzed median earnings.

The planned output is intended to focus on results pooled across multiple states. Statistics using sub-groupings of states may be included, if appropriate. Any state-specific results would require approval of the states in question.

Benefits to Census Bureau:
This research program will explore the potential for using administrative records to improve economic and demographic censuses, surveys, and intercensal population estimates. As part of the research, TANF data may be included in our research database called the Longitudinal Employer Household Dynamics Database. The goal is to develop optimal combinations of administrative record file information based on data accuracy, timeliness, and availability.

Benefits to HHS:
The LEHD feasibility analysis has been developed with cooperation of HHS staff to ensure that statistical products use appropriate methodologies.

2. **Evaluation and Improvement of Demographic Surveys Using TANF Administrative Records**

The Census Bureau administers multiple household surveys that collect data on the participation in TANF and public assistance programs. This project will evaluate the

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000536

quality of these data and propose modifications to survey instruments that will improve the quality of future data collections.

The project will focus on evaluating and improving the TANF coverage in the American Community Survey (ACS), the Current Population Survey (CPS), and the Survey of Income and Program Participation (SIPP). In the case of SIPP, this evaluation will inform the redesign of the SIPP survey instrument that is currently underway. The project will use the complete set of administrative records to consider coverage issues and distributional comparisons. The project will use linked survey and administrative records to compare details of program participation and to study patterns of non-response.

Benefits to Census Bureau: This project will evaluate the quality of Census Bureau survey data and potential to improve survey instruments for Census Bureau demographic surveys.

Benefits to HHS: This project will improve the usefulness of Census Bureau survey data for the administration of TANF programs by assessing and improving the accuracy of the survey data on the details of participation in these programs.

3. Enhance Record Linkage Methods

Census will improve our person validation and record linkage methods by processing the TANF data and using it in linked record analyses. These data will provide a valuable new source of information on the low income population. This population is hard to count, which could lead to them being underrepresented in surveys and enumerations.

The ability to match administrative records from a variety of providers reveals information about the relative quality and coverage of source data.

Benefits to Census Bureau: Data will allow us to develop and evaluate trends in match rates among persons in administrative record files. Census may also be able to evaluate how differences in match rates between states are attributable to data collection differences or in discrepancies in the Census Bureau linkage system, and measure the impact on survey and census analyses.

Benefits to HHS: This project will provide information about the coverage and quality of Census Bureau survey frames and responses, and will lead to improvements in survey estimates of persons in social welfare programs.

4. Research and Planning for the 2020 Census

The Census Bureau intends to test and potentially use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau intends to use NYS ODTA program information, along with data from federal, state, and

AMERICAN OVERSIGHT

private sources to pursue the following four research initiatives, leading to improvements in quality and efficiency of 2020 Census operations:

A. validating and enhancing the Master Address File (MAF);[1]
B. designing and assigning resources to carry out the 2020 Census;[2]
C. unduplicating public, private, and census lists; and
D. imputing missing data.[3]

Data quality will be explored using 2010 decennial census data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census to assess accuracy based on the level of aggregation.

Benefits to the Census Bureau: Data will allow improvements to data quality and methods to collect, measure and tabulate persons and housing units. Use of the TANF data will allow Census to model outreach and enumeration efforts for the hard-to-reach low income population. Use of the TANF data will enhance the race and ethnicity analyses and imputations needed in census data. The project will use the TANF data along with other federal, state, and commercial sources to develop statistical methods including models to support census operations.

Benefits to HHS: Data will allow improvements to decennial census data quality. Accurate decennial census population and housing unit counts are critical inputs to Census Bureau surveys and statistical products. The population counts and characteristics form the basis for all survey weighting methods. The housing unit frame, or Master Address File, is used for address-based sampling for the major demographic surveys. As a user of public use and internal survey files (through this joint statistical project), HHS will benefit from using frames and weights that allow samples to represent the U.S. population.

[1] Examples of possible Census Bureau uses include updating and evaluating the Master Address File.
[2] Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.
[3] Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000538

Attachment B
(variable list)

AMERICAN OVERSIGHT

Attachment C
Persons supporting projects

AMERICAN OVERSIGHT

RESET FORM

UNITED STATES GOVERNMENT
INTERAGENCY AGREEMENT (IAA)
Agreement Between Federal Agencies
General Terms & Conditions (GT&C) Section

BUREAU OF THE Fiscal Service
LEAD. TRANSFORM. DELIVER.

IAA Number TMSIS-2064-20-PAY-01 (GT&C #) Order # Amendment # / Mod #

DEPARTMENT AND/OR AGENCY		
1.	**Requesting Agency of Products / Services**	**Servicing Agency Providing Products / Services**
Name	Department of Commerce U.S.Census Bureau/ERD	Centers for Medicare & Medicaid Services (CMS)
Address	4600 Silver Hill Road, 5K120F Suitland, MD 20746	7500 Security Boulevard Baltimore MD 21244

2. Servicing Agency Tracking Number (Optional) : IA20-39

3. Assisted Acquisition Agreement ☐ Yes ☑ No

4. GT&C Action (Check action being taken)

☑ **New**

☐ **Amendment** - Complete only the GT&C blocks being changed and explain the changes being made.

☐ **Cancellation** - Provide a brief explanation for the IAA cancellation and complete the effective End Date.

5. Agreement Period Start Date Upon Final Signatures (MM-DD-YYYY) End Date 09/30/2020 (MM-DD-YYYY) of IAA or effective cancellation date

6. Recurring Agreement (Check One) A Recurring Agreement will continue, unless a notice to discontinue is received

☐ Yes If **Yes**, this is an: Annual Renewal ☐ Other Renewal ☐ State the other renewal period: _____

☑ No

7. Agreement Type (Check One) ☑ Single Order IAA ☐ Multiple Order IAA

8. Are Advance Payments Allowed for this IAA (Check One) ☐ Yes ☑ No

If **Yes** is checked, enter Requesting Agency's Statutory Authority Title and Citation

Note: Specific advance amounts will be captured on each related order.

AMERICAN OVERSIGHT

UNITED STATES GOVERNMENT
INTERAGENCY AGREEMENT (IAA)
Agreement Between Federal Agencies
General Terms & Conditions (GT&C) Section

BUREAU OF THE Fiscal Service
LEAD. TRANSFORM. DELIVER.

IAA Number TMSIS-2064-20-PAY-01
GT&C # Order # Amendment # / Mod #

9. Estimated Agreement Amount (The Servicing Agency completes all information for the estimated agreement amount)
(Optional for assisted Acquisitions)

Direct Cost	$41,500.00	Provide a general explanation of the Overhead Fees and Charges
Overhead Fees & Charges		
Total Estimated Amount	$41,500.00	

10. STATUTORY AUTHORITY

a. Requesting Agency's Authority (Check One)

Franchise Fund	Revolving Fund	Working Capital Fund	Economy Act (31 U.S.C. 1535 / FAR 17.5)	Other Authority
☐	☐	☐	☐	☑

Fill in Statutory Authority Title and Citation for Franchise Fund, Revolving Fund, Working Capital Fund, or Other Authority
Transfer Authority: Section 1106(b) of the Social Security Act

b. Servicing Agency's Authority (Check One)

Franchise Fund	Revolving Fund	Working Capital Fund	Economy Act (31 U.S.C. 1535 / FAR 17.5)	Other Authority
☐	☐	☐	☐	☑

Fill in Statutory Authority Title and Citation for Franchise Fund, Revolving Fund, Working Capital Fund, or Other Authority
Transfer Authority: Section 1106(b) of the Social Security Act

11. Requesting Agency's Scope (State and/or List Attachments that support Requesting Agency's Scope.)
Refer to the IAA Addendum, Attachment 1- the Commerce/Census-8, Statistical Administrative Records Systems of Records Notice and Commerce/Census-3, Individual & Household Statistical Surveys Records and Special Studies Records, and Data Use Agreement (DUA) 21550.

12. Roles and Responsibilities for the Requesting Agency and the Servicing Agency (State and/or list attachments for the roles and responsibilities for the Requesting Agency and the Servicing Agency)
Refer to the IAA Addendum, Attachment 1- the Commerce/Census-8, Statistical Administrative Records Systems of Records Notice and Commerce/Census-3, Individual & Household Statistical Surveys Records and Special Studies Records, and DUA 21550.

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000542

UNITED STATES GOVERNMENT
INTERAGENCY AGREEMENT (IAA)
Agreement Between Federal Agencies
General Terms & Conditions (GT&C) Section

BUREAU OF THE Fiscal Service
LEAD. TRANSFORM. DELIVER.

IAA Number TMSIS-2064-20-PAY-01
GT&C # Order # Amendment # / Mod #

13. Restrictions (Optional) (State and/or attach unique requirements and/or mission specific restrictions specific to this IAA).

Refer to the IAA Addendum, Attachment 1- the Commerce/Census-8, Statistical Administrative Records Systems of Records Notice and Commerce/Census-3, Individual & Household Statistical Surveys Records and Special Studies Records, and DUA 21550.

14. Assisted Acquisition Small Business Credit Clause (The Servicing Agency will allocate the socio-economic credit to the Requesting Agency for any contract actions it has executed on behalf of the Requesting Agency).

15. Disputes: Disputes related to this IAA shall be resolved in accordance with instructions provided in the Treasury Financial Manual (TFM) Volume I, Part 2, Chapter 4700, Appendix 10; Intragovernmental Transaction (IGT) Guide.

16. Termination (Insert the number of days that this IAA may be terminated by written notice by either the Requesting or Servicing Agency.)

30

If this agreement is canceled, any implementing contract/order may also be canceled. If the IAA is terminated, the agencies shall agree to the terms of the termination, including costs attributable to each party and the disposition of awarded and pending actions.

If the Servicing Agency incurs costs due to the Requesting Agency's failure to give the requisite notice of its intent to terminate the IAA, the Requesting Agency shall pay any actual costs incurred by the Servicing Agency as a result of the delay in notification, provided such costs are directly attributable to the failure to give notice.

17. Assisted Acquisition Agreements - Requesting Agency's Organizations Authorized to Request Acquisition Assistance for this IAA (State or attach a list of Requesting Agency's organizations authorized to request acquisition assistance for this IAA.

N/A

18. Assisted Acquisition Agreements - Servicing Agency's Organizations Authorized to Request Acquisition Assistance for this IAA (State or attach a list of Servicing Agency's organizations authorized to request acquisition assistance for this IAA.)

N/A

19. Requesting Agency Clause(s) (Optional) (State and/or attach any additional Requesting Agency clauses.)

Refer to the IAA Addendum, Attachment 1- the Commerce/Census-8, Statistical Administrative Records Systems of Records Notice and Commerce/Census-3, Individual & Household Statistical Surveys Records and Special Studies Records, and DUA 21550.

20. Servicing Agency Clause(s) (Optional) (State and/or attach any additional Servicing Agency clauses.)

CMS does not allow pen and ink changes or altering to this agreement after any signatures have been obtained. Changes that occur in any section from the approved version to the final signed version will not be accepted by CMS.

If changes are required to this agreement, please contact the CMS preparer Contracting Officer Representative (COR) to have the agreement changes routed for the Office of Acquisition and Grants Management (OAGM) re-approval.

In addition, refer to the IAA Addendum, Attachment 1- the Commerce/Census-8, Statistical Administrative Records Systems of Records Notice and Commerce/Census-3, Individual & Household Statistical Surveys Records and Special Studies Records, and DUA 21550.

AMERICAN OVERSIGHT

UNITED STATES GOVERNMENT
INTERAGENCY AGREEMENT (IAA)
Agreement Between Federal Agencies
General Terms & Conditions (GT&C) Section

BUREAU OF THE Fiscal Service
LEAD. TRANSFORM. DELIVER.

IAA Number TMSIS-2064-20-PAY-01 (GT&C #) ____ (Order #) ____ (Amendment # / Mod #)

21. Additional Requesting Agency and/or Servicing Agency Attachments (Optional) (State and/or attach any additional Requesting Agency and/or Servicing Agency Attachments)

Refer to the IAA Addendum, Attachment 1- the Commerce/Census-8, Statistical Administrative Records Systems of Records Notice and Commerce/Census-3, Individual & Household Statistical Surveys Records and Special Studies Records, and DUA 21550.

22. Annual Review of IAA
By signing this agreement, the parties agree to annually review the IAA if the agreement period exceeds one year. Appropriate changes will be made by amendment to the GT&C and/or modification to any affected Order(s).

AGENCY OFFICIAL

The Agency Official is the highest level accepting authority or official as designated by the Requesting Agency and Servicing Agency to sign this agreement. Each Agency Official must ensure that the general terms and conditions are properly defined, including the stated statutory authorities, and, that the scope of work can be fulfilled as per the agreement.

The Agreement Period Start Date (Block 5) must be the same as or later than the signature dates.

Actual work for this IAA may NOT begin until an Order has been signed by the appropriate individuals, as stated in the Instructions for Blocks 37 and 38.

23.	Requesting Agency	Servicing Agency
Name	Kevin Deardorff	Andy Shatto
Title	ERD, Division Chief	Deputy Director, Office of Enterprise Data & Analytics (OEDA)
Telephone Number(s)	(301) 763-6033	(410) 786-6384
Fax Number		
Email Address	kevin.e.deardorff@census.gov	Andrew.Shatto@cms.hhs.gov
SIGNATURE	POK!	Andrew E. Shatto - S — Digitally signed by Andrew E. Shatto -S Date: 2019.12.14 12:08:37 -05'00'
Approval Date	12/12/2019	

AMERICAN OVERSIGHT

RESET FORM

UNITED STATES GOVERNMENT INTERAGENCY AGREEMENT (IAA)

Agreement Between Federal Agencies
Order Requirements and Funding Information (Order) Section

BUREAU OF THE Fiscal Service
LEAD. TRANSFORM. DELIVER.

IAA Number	TMSIS-2064-20-PAY-01	0001		Servicing Agency's Agreement Tracking Number (Optional)	IA20-39
	GT&C #	Order #	Amendment # / Mod #		

PRIMARY ORGANIZATION/OFFICE INFORMATION

24.	Requesting Agency	Servicing Agency
Primary Organization / Office Name	Department of Commerce U.S.Census Bureau/ERD	Centers for Medicare & Medicaid Services (CMS)
Responsible Organization / Office Address	4600 Silver Hill Road, 5K120F Suitland, MD 20746	7500 Security Boulevard Baltimore, MD 21244

ORDER REQUIREMENTS INFORMATION

25. Order Action (Check One)

☑ **New**

☐ **Modification** (Mod) - List affected Order blocks being changed and explain the changes being made. For Example: for a performance period mod, state the new performance period for this Order in Block 27. **Fill out the Funding Modification Summary by Line** (Block 26) if the mod involves adding, deleting, or changing **Funding for an Order Line.**

☐ **Cancellation** - Provide a brief explanation for Order cancellation and fill in the Performance Period End Date for the effective cancellation date.

26. Funding Modification Summary by Line	Line #	Line #	Line #	Total of All Other Lines (attach funding details)	Total
Original Line Funding					$0.00
Cumulative Funding Changes From Prior Mods [addition (+) or reduction (-)]					$0.00
Funding Change for This Mod					$0.00
TOTAL Modified Obligation	$0.00	$0.00	$0.00	$0.00	$0.00
Total Advance Amount (-)					$0.00
Net Modified Amount Due	$0.00	$0.00	$0.00	$0.00	$0.00

27. Performance Period
For a performance period mod, insert the start and end dates that reflect the new performance period.

Start Date: Upon Final Signatures (MM-DD-YYYY)

End Date: 09/30/2020 (MM-DD-YYYY)

AMERICAN OVERSIGHT

UNITED STATES GOVERNMENT INTERAGENCY AGREEMENT (IAA)
Agreement Between Federal Agencies
Order Requirements and Funding Information (Order) Section

BUREAU OF THE Fiscal Service
LEAD. TRANSFORM. DELIVER.

IAA Number TMSIS-2064-20-PAY-01 (GT&C #) | 0001 (Order #) | (Amendment # / Mod #) | Servicing Agency's Agreement Tracking Number (Optional) IA20-39

28. Order Line / Funding Information									Line Number							
	Requesting Agency Funding Information								Servicing Agency Funding Information							
ALC	13040001								75050080							
Component TAS (required by 10/1/2014)	SP	ATA	AID	BPOA	EPOA	A	MAIN	SUB	SP	ATA	AID	BPOA	EPOA	A	MAIN	SUB
			013	2020	2022		0450	000			075	2020	2020		0511	000
and/or current TAS format									75-20-0511							
BETC	DISB CAN: 5995932								COLL CAN: 5991341							
Object Class Code (Optional)									25308							
BPN	929955383								927645622							
BPN + 4 (Optional)																
Additional Accounting Classification / Information (Optional)	EIN: 53-0104537								BAP: 2200320000 PAC:0440 EIN: 52-0883104							
Requesting Agency Funding Expiration Date 09-30-2022 MM-DD-YYYY									Requesting Agency Funding Cancellation Date 09-30-2027 MM-DD-YYYY							

Project Number & Title Project #009005 IA20-39 T-MSIS, Census #6750F01

Description of Products and/or Service, including the Bona Fide Need for this Order (State or attach a description of products/services, including the Bona Fide need for this Order.)

Refer to the IAA Addendum, Attachment 1- the Commerce/Census-8, Statistical Administrative Records Systems of Records Notice and Commerce/Census-3, Individual & Household Statistical Surveys Records and Special Studies Records, and Data Use Agreement (DUA) 21550.

I hereby certify that (a) this requirement represents a bona fide need of fiscal year or years for which the appropriation was made and complies with the Anti-deficiency Act and (b) funds are committed for the period of performance of this order.

North American Industry Classification System (NCAIS) Number (Optional)

Breakdown of Reimbursable Line Costs and/or Breakdown of Assisted Acquisition Line Cost:

Unit of Measure			Contract Cost	
Quantity	Unit Price	Total	Servicing Fees	
1	$41,500.00	$41,500.00	Total Obligated Cost	$0.00
Overhead Fees and Charges			Advance for Line (-)	
Total Line Amount Obligated		$41,500.00	Net Total Cost	$0.00
Advance Line Amount (-)			Assisted Acquisition Servicing Fees Explanation	
Net Line Amount Due		$41,500.00		

Type of Service Requirements

(●) Severable Service ( ) Non-Severable Service ( ) Not Applicable

AMERICAN OVERSIGHT

UNITED STATES GOVERNMENT INTERAGENCY AGREEMENT (IAA)
Agreement Between Federal Agencies
Order Requirements and Funding Information (Order) Section

BUREAU OF THE Fiscal Service
LEAD. TRANSFORM. DELIVER.

IAA Number TMSIS-2064-20-PAY-01 (GT&C #) | 0001 (Order #) | (Amendment # / Mod #) | Servicing Agency's Agreement Tracking Number (Optional) IA20-39

29. Advance Information (Complete Block 29 if the Advance Payment for Products/Services was checked "Yes" on the GT&C)

Total Advance Amount for the Order _____ [All Order Line Advance amounts (Block 28) must sum to this total.]

Revenue Recognition Methodology (according to SFFAS 7)(Identify the Revenue Recognition Methodology that will be used to account for the Requesting Agency's expense and the Servicing Agency's revenue.)

☐ Straight-Line — Provide amount to be accrued _____ and Number of Months _____

☐ Accrual Per Work Completed — Identify the accounting post period:

☐ Monthly per work completed & invoiced

☐ Other — Explain other regular period (bimonthly, quarterly, etc.) for posting accruals and how the accrual amounts will be communicated if other than billed.

30. Total Net Order Amount: $41,500.00
[All Order Line Net Amounts Due for reimbursable agreements and Net Total Costs for Assisted Acquisition Agreements (Block 28) must sum to this total]

31. Attachments (State or list attachments)

☐ Key Project and/or acquisition milestones (Optional except for Assisted Acquisition Agreements)

☑ Other Attachments (Optional)

Refer to the IAA Addendum, Attachment 1- the Commerce/Census-8, Statistical Administrative Records Systems of Records Notice and Commerce/Census-3, Individual & Household Statistical Surveys Records and Special Studies Records, and DUA 21550.

BILLING AND PAYMENT INFORMATION

32. Payment Method (Check One) **[Intra-governmental Payment and Collection (IPAC)** is the Preferred Method.]

☐ Requesting Agency Initiated IPAC
☐ Credit Card
☑ Servicing Agency Initiated IPAC
☐ Other — Explain other payment method and reasoning: _____

33. Billing Frequency (Check One)
[An invoice must be submitted by the Servicing Agency and accepted by the Requesting Agency BEFORE funds are reimbursed (i.e., via IPAC transaction)]

CMS will invoice when the DUA and data request are approved by September 30, 2020.

☐ Monthly ☐ Quarterly ☑ Other Billing Frequency (include explanation): See above

34. Payment Terms (Check One)

☑ 7 Days ☐ Other Payment Terms (include explanation): _____

AMERICAN OVERSIGHT

UNITED STATES GOVERNMENT INTERAGENCY AGREEMENT (IAA)
Agreement Between Federal Agencies
Order Requirements and Funding Information (Order) Section

BUREAU OF THE Fiscal Service
LEAD. TRANSFORM. DELIVER.

IAA Number TMSIS-2084-20-PAY-01 (GT&C #) 0001 (Order #) (Amendment # / Mod #) Servicing Agency's Agreement Tracking Number (Optional) IA20-39

35. Funding Clauses / Instructions (Optional) (State and/or list funding clauses/instructions)

36. Delivery / Shipping Information for Products (Optional)

Agency Name	
Point of Contact (POC) Name & Title	
POC Email Address	
Delivery Address / Room Number	
POC Telephone Number	
Special Shipping Information	

APPROVALS AND CONTACT INFORMATION

37. Program Officials
The Program Officials, as identified by the Requesting Agency and Servicing Agency, must ensure that the scope of work is properly defined and can be fulfilled for this Order. The Program Official may or may not be the Contracting Officer depending on each agency's IAA business process.

	Requesting Agency	Servicing Agency
Name	Kevin Deardorff	Andy Shatto
Title	Division Chief, ERD	Deputy Director, OEDA
Telephone Number	(301) 763-6033	(410) 786-6384
Fax Number		
Email Address	kevin.e.deardorff@census.gov	Andrew.Shatto@cms.hhs.gov
SIGNATURE	FOR: [signature]	Andrew E. Shatto -S Digitally signed by Andrew E. Shatto -S Date: 2019.12.14 12:09:16 -05'00'
Date Signed	12/12/19	

38. Funding Officials — The Funds Approving Officials, as identified by the Requesting Agency and Servicing Agency, certify that the funds are accurately cited and can be properly accounted for per the purposes set forth in the Order. The Requesting Agency Funding Official signs to obligate funds. The Servicing Agency Funding Official signs to start the work, and to bill, collect, and properly account for funds from the Requesting Agency, in accordance with the agreement.

	Requesting Agency	Servicing Agency
Name	Kevin Deardorff	Alisha Williams
Title	Division Chief, ERD	CMS Funding Official
Telephone Number	(301) 763-6033	(410) 786-7507
Fax Number		
Email Address	kevin.e.deardorff@census.gov	Alisha.Williams@cms.hhs.gov
SIGNATURE	FOR: [signature]	Alisha Williams -S Digitally signed by Alisha Williams -S Date: 2019.12.10 16:55:55 -05'00'
Date Signed	12/12/19	

AMERICAN OVERSIGHT

UNITED STATES GOVERNMENT INTERAGENCY AGREEMENT (IAA)
Agreement Between Federal Agencies
Order Requirements and Funding Information (Order) Section

BUREAU OF THE Fiscal Service
LEAD. TRANSFORM. DELIVER.

IAA Number TMSIS-2064-20-PAY-01 (GT&C #) | 0001 (Order #) | (Amendment # / Mod #) | Servicing Agency's Agreement Tracking Number (Optional) IA20-39

CONTACT INFORMATION		
39. FINANCE OFFICE Points of Contact (POCs)		
	Requesting Agency (Payment Office)	**Servicing Agency (Billing Office)**
Name	Darrell Blyden	CMS RIA Collections
Title	Supervisory Accountant	Financial POC
Office Address	4600 Silver Hill Road, HQ, 2K415 Washington, D.C. 20233-3700	
Telephone Number	(301) 763-4390	
Fax Number	(301) 763-4504	
Email Address	Darrell.b.Blyden@Census.gov	DAOReimbursableIA@cms.hhs.gov
Signature & Date (Optional)		
40. ADDITIONAL Points of Contact (POCs) (as determined by each Agency) This may include CONTRACTING Office Points of Contact (POCs).		
	Requesting Agency	**Servicing Agency**
Name	G. Patricia de la Cruz	Tyra Jeffries
Title	Survey Statistician, Data Acquisitions Staff	CMS IAA Coordinator
Office Address	4600 Silver Hill Road, 5K120F Suitland, MD 20746	7500 Security Boulevard Baltimore, MD 21244
Telephone Number	(301) 763-2377	(410) 786-5156
Fax Number		
Email Address	g.patricia.de.la.cruz@census.gov	tyra.jeffries@cms.hhs.gov
Signature & Date (Optional)		
Name	Nicole Adolph	Cara Petroski
Title	Branch Chief for Data Acquisitions	CMS COR - CCW IAA Coordinator
Office Address	4600 Silver Hill Road, 5K120F Suitland, MD 20746	7500 Security Boulevard, Baltimore, MD 21244
Telephone Number	(301) 763-1577	(410) 786-0305
Fax Number		
Email Address	nicole.s.adolph@census.gov	cara.petroski@cms.hhs.gov
Signature & Date (Optional)		
Name		Emory Toomey
Title		CCW Program Official
Office Address		7500 Security Boulevard Baltimore, MD 21244
Telephone Number		(410) 786-4188
Fax Number		
Email Address		Emory.Toomey@cms.hhs.gov
Signature & Date (Optional)		

AMERICAN OVERSIGHT

ADDENDUM TO THE FS 7600A & 7600B
INTERAGENCY AGREEMENT
between
The Department of Commerce
United States Census Bureau (Census Bureau)
and
The U.S. Department of Health and Human Services
The Centers for Medicare & Medicaid Services (CMS)

Census Bureau Control Number: TMSIS-2064-20-PAY-01
CMS Control Number: IA20-39

I. PURPOSE

The purpose of this Interagency Agreement (IAA) is to delineate the terms and conditions by which the Department of Commerce, U.S. Census Bureau (Census Bureau) agrees to pay data processing fees for Transformed-Medicaid Statistical Information System (T-MSIS) Analytic File (TAF) Eligibility data from the Centers for Medicare & Medicaid Services (CMS) in support of Census Bureau research.

II. INTEGRATION

The signed 7600A, 7600B, this Addendum, Data Use Agreement (DUA) 21550 and Attachment 1- the Commerce/Census-8, Statistical Administrative Records Systems of Records Notice and Commerce/Census-3, Individual & Household Statistical Surveys Records and Special Studies Records constitute the entire agreement of the Census Bureau and CMS with respect to its subject matter. There have been no representations, warranties, or promises made outside of this agreement. This agreement will take precedence over any other documents that may be in conflict with it.

III. AUTHORITY

Transfer of funds Authority
This agreement is made under the authority of Section 1106(b) of the Social Security Act.

Census Bureau Programmatic Authority: This IAA is made under the authority of 13, U.S.C., Section 6; Title 13, U.S.C., Section 141, 181, 182; The Privacy Act of 1974; Title 5, U.S.C., Section 552a(b)(4), which permits disclosure of records for purposes of planning or carrying out a census, survey or related activity pursuant to Title 13.

***CMS Programmatic* Authority:** This agreement is made under the authority of the Reorganization Act of 1953, Public Law (P.L.) 88-426.

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000550

IV. BACKGROUND

In the Demographic Directorate, staff use the data to assess the quality of health insurance coverage information collected in household surveys. The information is also used to research, produce, and publish estimates of health insurance coverage for small geographic areas (e.g. states and counties) in the Small Area Health Insurance Estimates Program. In the Decennial Directorate, staff are exploring how TMSIS Analytical File (TAF) data along with other federal, state, and private data sources to plan a complete and efficient 2020 Census. Staff in the Research and Methodology Directorate analyze the quality, coverage, and consistency of TAF data, and also link the data to other survey and administrative records sources to explore the characteristics of program participants.

In all of these research and production uses, only aggregate statistical information is released that meets Census Bureau Disclosure Avoidance Review standards.

V. SCOPE OF WORK

Under this IAA, CMS will provide the Census Bureau with the requested data from the Chronic Condition Warehouse/Virtual Research Data Center (CCW/VRDC). The requesting organization will conform with all of CMS's data release policies and procedures. CMS will make the appropriate minimally necessary data available to approved users once all CMS data requirements are met.

The Census Bureau will use the data with information from Census and survey respondents, information from federal and state agencies, and information from third party vendors for statistical purposes only. The Census Bureau intends to use data acquired under this agreement at Census Bureau Headquarters in Suitland, Maryland, and in the Research Data Center (RDC) Network. Only Census Bureau employees and Title 13, U.S.C. Section 23(c) Special Sworn Status researchers working on approved projects will access data acquired under this agreement.

VI. DURATION OF AGREEMENT

Effective Date: This IAA is effective on the date it is signed by the responsible parties. The period of performance will end on September 30, 2020.

VII. FUNDS

Funds for this IAA will not exceed $41,500.00 for Fiscal Year (FY) 2020. The Census Bureau shall reimburse CMS for all services provided under the terms of this agreement. The Census Bureau and CMS cannot begin work or bill through the Intra-governmental Payment and Collection (IPAC) system until receipt of the IAA signed by all parties. CMS will bill in full for the amount noted above by September 30, 2020 utilizing IPAC for actual costs incurred. Appropriate accounting data will be cited in all billing documents: CMS's control number is CMS **IA20-39**. Funds will be obligated upon final signatures on the 7600B. **See the 7600B for Funding Information.**

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000551

VIII. DUPLICATION

Full implementation of this agreement will not duplicate any existing agreements. This agreement does not conflict or duplicate any current Office of Enterprise Data & Analytics agreements.

IX. MODIFICATION AND TERMINATION

Any modification or amendment of this agreement must be agreed to by both parties in writing. This agreement may be modified to incorporate new sections or language as required to ensure compliance with the respective agency's legislative mandates and internal policies and processes. Either party may terminate this agreement by giving the other party 30 days' notice in writing. If the Census Bureau cancels the order, CMS is authorized to collect costs incurred prior to cancellation of the order plus any termination cost, not to exceed the total amount obligated under this agreement.

X. PRIVACY ACT

This IAA has been reviewed for Privacy Act implications. Data being released pursuant to this Agreement falls under the Privacy Act of 1974, as amended, 5 U.S.C. 552a; the Freedom of Information Act, 5 U.S.C. 552; and Section 1106(A) of the Social Security Act. All Medicare and Medicaid data and any data files, which were derived from the data, will be dispositioned according to the schedule stated in DUA 21550 and in accordance with the terms and conditions indicated in Form CMS-10252 (Data Use Agreement Certificate of Disposition (COD) for Data Acquired from the Centers for Medicare & Medicaid Services).

The CMS System(s) of Records (SOR) from which the data will be released is the Chronic Condition Warehouse, System No. 09-70-0573. The SOR may contain Protected Health Information (PHI) as defined by the Department of Health and Human Services' regulation "Standards for Privacy of Individually Identifiable Health Information" (45 CFR Parts 160 and 164, 65 Federal Register 82462 as amended by 66 Federal Register 12434). Disclosures of PHI, authorized by the Health Information Portability and Accountability Act (HIPAA), may only be made if, and as permitted or required by the "Standards for Privacy of Individually Identifiable Health Information."

Disclosure to the Census Bureau is authorized by **5 U.S.C. § 552a(b)(4) (Bureau of the Census)**. The systems of records used by the Census Bureau in support of this data-sharing project are: (1) the Commerce/Census-8, Statistical Administrative Records Systems of Records Notice and (2) Commerce/Census-3, Individual & Household Statistical Surveys Records and Special Studies Records **(Attachment I)**. All data that CMS agrees to provide the Census Bureau remains confidential. Maintaining confidentiality of these data is guaranteed under Title 13 U.S.C, Section 9; the Privacy Act of 1974; and Section 1106 of the Social Security Act (42 U.S.C. § 1306).

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000552

XI. INFORMATION SECURITY

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence and to use the data for statistical purposes only in accordance with the provisions of Title 13, United States Code. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with the National Institute of Standards and Technology (NIST) Federal Information Processing Standards (FIPS) 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "Recommended Security Controls for Federal Information Systems and Organizations," as well as Special Publication 800-37r1 "Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO as well as the Department of Commerce Office of Inspector General as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "Standards for Security Categorization of Federal Information and Information Systems" and NIST Special Publication 800-60r1 "Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices." Security controls and subsequent assessments are done based on the final categorization.

Cloud providers must be approved for at least moderate level information through the GSA FedRAMP process prior to acquiring any services. Census Bureau identifies, assesses and authorizes use based on the published FedRAMP results and an assessment of any Census Bureau (customer provided) controls implemented to protect the infrastructure and data. Security reporting on cloud providers is reported to the Department of Commerce on a regular basis under FISMA.

The Census Bureau maintains a policy regarding the reporting of and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are reported within one hour to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau becomes aware of a known breach of CMS data, the Census Bureau will contact the identified CMS contacts to discuss the actions and potential remedies in regards to the incident.

Disclosure Avoidance Review of Statistical Products

Title 13, Section 9 of the United States Code (U.S.C.) requires the Census Bureau to keep confidential and the information collected from the public under the authority of Title 13. Section 214 of Title 13, U.S.C., and Sections 3551, 3559 and 3571 of Title 18, U.S.C., provide for the imposition of penalties of up to five years in prison and/or up to $250,000.00 in fines for wrongful disclosure of confidential census information.

AMERICAN OVERSIGHT

Disclosure avoidance is the process for protecting the confidentiality of data, as required under Title 13 U.S.C. A disclosure of data occurs when someone can use published statistical information to identify and individual who has provided confidential information under a pledge of confidentiality. For data tabulations, the Census Bureau uses disclosure avoidance procedures to modify or remove the characteristics that put confidential information at risk for disclosure. Although a published table may appear to show information about a specific individual, the Census Bureau has taken steps to disguise or suppress the original data, while making sure the results are still useful. The techniques used by the Census Bureau to protect confidentiality in tabulations vary, depending on the type of data.

Noise injection is the Census Bureau's preferred disclosure avoidance technique. By policy, noise injection is to be applied to all data products that are reported with geographies smaller than a state. In cases when it is not feasible to fully implement noise injection within the period of the contract, a transition plan for implementing noise injection or other provable privacy methods must be developed in coordination with the Census Bureau. Noise injection may be required for microdata releases, depending on the characteristics of the microdata and the specific variables that are to be released. Data that cannot be publicly released may still be analyzed within the Federal Statistical Research Data Centers (FSRDCs) by individuals who have Special Sworn Status; the results of such analyses must still go through a disclosure avoidance process prior to being publicly released.

The parties understand that Title 13 confidentiality protection and disclosure avoidance techniques apply to all work described in this agreement. The disclosure avoidance disclosure methods are defined by the Census Bureau who has the responsibility of carrying out that work. Accordingly, upon completion of the tabulation, the data produced must be reviewed by the Census Bureau to ensure that no identifiable Title 13 data are or may be disclosed. Should the Census Bureau's Disclosure Review Board (DRB) determine that the requested statistical product does or reasonably could result in such disclosure, then the data product will be modified prior to approval for release to the party(ies) of this agreement. The DRB must approve before a research product can be released to an individual who does not have Special Sworn Status (SSS) and a need to know, or moved to a computer not approved for controlled data according to Census' existing policies and procedures. All data releases will conform to both Census and CMS disclosure requirements as described here and in DUA 21550.

This IAA has been reviewed for Information Security implications. Any CMS information exchanged or CMS information systems accessed pursuant to this IAA falls under the statutory requirements of the Federal Information Security Management Act of 2002 (FISMA), 44 U.S.C §§ 3541-3549, as amended by the Federal Information Security Modernization Act, 44 U.S.C. §§ 3551-3558;.

FISMA requires all federal agencies to protect the confidentiality, integrity and availability of federal information and information systems from unauthorized access disclosure, duplication, modification, diversion, destruction, loss, misuse or theft whether accidental or intentional. The CMS security and privacy controls used to provide the protections shall be

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000554

risk-based and business-driven with implementation achieved through a defense-in-depth structure. Access to all CMS information and information systems shall be limited on a least privilege and a need-to-know basis. The requirements used by all CMS systems to implement FISMA can be found in:

- The Office of Management and Budget (OMB) Circular No. A-130, revised. "*Management of Federal Information Resources*"; Appendix I, "Responsibilities for Protecting and Managing Federal Information Resources" (http://www.whitehouse.gov/omb/circulars),
- The National Institute of Standards and Technology (NIST) Special Publications (SP) (http://csrc.nist.gov/publications),
- The HHS Information Systems Security and Privacy Policy (IS2P) (HHS FISMA Working Group Collaboration Page) or mailto:FISMA@hhs.gov,
- The CMS Information Systems Security and Privacy Policy (IS2P2),
- CMS Information Security Acceptable Risk Safeguards (ARS), CMS Minimum Security Requirements (CMSR) as amended CMS Information Security Acceptable Risk Safeguards CMS Minimum Security Requirements (CMSR), and
- Other polices, standards, procedures and templates located on the Information Security and Privacy Library.

When receiving CMS electronic protected health information as defined by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) Security Rule, the protection of that information must be commensurate with applicable Federal Privacy protections for individually identifiable health information.

The parties of this IAA will ensure the terms are in compliance with Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. §794 (d), as amended by the Workforce Investment Act of 1998 (P.L. 105-220), August 7, 1998). CMS systems must also, implement the Department of Health & Human Services' HHS Policy for Section 508 Electronic and Information Technology (EIT) issued January 2005.

>>>

Attachment I

COMMERCE/CENSUS–8

System Name:

Statistical Administrative Records System (October 27. 2010. 75FR 66061).

Security Classification:

None

System Location:

U.S. Census Bureau, 4600 Silver Hill Road, Washington, DC 20233-8100; Bureau of the Census, Bowie Computer Center, 17101 Melford Blvd., Bowie, Maryland 20715.

Categories of Individuals Covered by the System:

This system covers the population of the United States. In order to approximate coverage of the population in support of its statistical programs, the Census Bureau will acquire administrative record files relevant to those programs from agencies including, the Departments of Agriculture, Education, Health and Human Services, Homeland Security, Housing and Urban Development, Labor, Treasury, Veterans Affairs, and from the Office of Personnel Management, the Social Security Administration, the Selective Service System, and the U.S. Postal Service. Comparable data may also be sought from State agencies and commercial sources.

Categories of Records in the System:

The first category contains records with personal identifiers (names and Social Security Numbers), with access restricted to a limited number of sworn Census Bureau staff. The records are maintained in a secure restricted-access environment. They are used solely during a brief period while the personal identifiers are replaced with unique non-identifying codes. The second category contains records that are maintained on unique data sets that are extracted or combined on an as needed basis using the unique non-identifying codes but with the original identifiers removed. These records may contain: Demographic information—date of birth, sex, race, ethnicity, household and family characteristics, education, marital status, Tribal affiliation, and veteran's status; Geographical information—address and geographic codes; Mortality information—cause of death and hospitalization information; Health information—type of provider, services provided, cost of services, and quality indicators; Economic information—housing characteristics, income, occupation, employment and unemployment information, health insurance coverage, Federal program participation, assets, and wealth. The third category contains two types of records that are maintained on unique data sets that are extracted or combined on an as-needed basis using the unique non-identifying codes but with some name information retained. One type of records contain: Business information—business name, revenues, number of employees, and industry codes in support of economic statistical products. The other type contains: Respondent contact information—name, address, telephone number, age, and sex in support of survey and census data collection efforts.

AMERICAN OVERSIGHT

Authorities for Maintenance of the System:

Title 13 U.S.C. 6

Purpose(s):

The purpose of this system is to centralize and control the use of personally identifiable information by providing a secure repository that supports statistical operations through the removal of personal identifiers (Social Security Numbers and names), prior to delivery to other Census Bureau operating units. By combining current demographic and economic survey and census data with administrative record data from other agencies, and data procured from commercial sources on an as-needed basis, the Census Bureau will improve the quality and usefulness of its statistics and reduce the respondent burden associated with direct data collection efforts. The system will also be used to plan, evaluate, and enhance survey operations; improve questionnaire design and selected survey data products; and produce research and statistical products such as estimates of the demographic, social, and economic characteristics of the population.

Routine Uses of Records Maintained in the System, Including Categories of Users and the Purposes of Such Uses:

None. The StARS will be used only for statistical purposes. No disclosures which permit the identification of individual respondents, and no determinations affecting individual respondents will be made.

Disclosure to Consumer Reporting Agencies:

None.

Policies and Practices for Storing, Retrieving, Accessing, Retaining, and Disposing of Records in the System:

Storage:

Records will be stored in a secure computerized system and on magnetic media; output data will be either electronic or paper copies. Source data sets containing personal identifiers will be maintained in a secure restricted access environment.

Retrievability:

Staff producing statistical products will have access only to data sets from which Social Security Numbers have been deleted and replaced by unique non-identifying codes internal to the Census Bureau. Only a limited number of sworn Census Bureau staff, who work within a secure restricted-access environment, will be permitted to retrieve records containing Social Security Numbers.

AMERICAN OVERSIGHT

Safeguards:

Each project must be approved by an in-house Project Review Board to ensure that data relating to the project will be used only for authorized purposes. All uses of the data will be only for statistical purposes, which by definition means that uses will not directly affect any individual. Once the Project Review Board has approved a project, construction of statistical extracts with information from one or more of the source data sets may occur. Extract data sets will be based on unique non-identifying codes and will only be released to designated sworn Census Bureau staff with a need-to-know. The data in the extracts for these projects will not be made publicly available. Any publications based on the StARS will be cleared for release under the direction of the Census Bureau's Disclosure Review Board, which will confirm that all the required disclosure protection procedures have been implemented. No information will be released that identifies any individual. All employees are subject to the restrictions, penalties, and prohibitions of 13 U.S.C. 9 and 214; 5 U.S.C. 552a (b)(4); 18 U.S.C. 1905; 26 U.S.C. 7213; and 42 U.S.C. 1306. When confidentiality or penalty provisions differ, the most stringent provisions apply to protect the data. Employees are regularly advised of the regulations issued pursuant to 13 U.S.C 9 and 214 and other relevant statutes governing confidentiality of the data. For example, 13 U.S.C. 214 provides for penalties of up to five years in prison, and applicable criminal statutes could impose fines up to $250,000, for any releases of confidential data. The restricted-access environment has been established to limit the number of Census Bureau employees with direct access to the personal identifiers in this system, so as to protect the confidentiality of the data and to prevent unauthorized use or access. These safeguards provide a level and scope of security that meet the level and scope of security established by the Office of Management and Budget in OMB Circular No. A–130, Appendix III, Security of Federal Automated Information Resources. Furthermore, the use of unsecured telecommunications to transmit individually identifiable information is prohibited.

Retention and Disposal:

Records are to be retained in accordance with the unit's Records Control Schedule, which is based on separate agreements with each source entity. Retention is not to exceed 10 years, unless, by agreement with the source entity, it is determined that a longer period is necessary for statistical purposes. At the end of the retention period or upon demand, all original data sets, extracts, and paper copies, from each source entity will be returned or destroyed as mandated by the agreements.

System Manager and Address:

Associate Director for Demographic Programs, U.S. Census Bureau, 4600 Silver Hill Road, Washington, DC 20233–8000.

Notification Procedure:

For the Census Bureau's records, information may be obtained from: Assistant Division Chief for Data Management, Data Integration Division, Demographic Directorate, U.S. Census Bureau, 4600 Silver Hill Road, Washington, DC 20233–8100.

AMERICAN OVERSIGHT

Record Access Procedures:

Record Notification Procedure above.

Contesting Record Procedures:

None

Record Source Categories:

Individuals covered by selected administrative record systems and Census Bureau censuses and surveys.

Exemption Claimed For System:
Pursuant to 5 U.S.C., Section 552a(k)(4), this system of records is exempted from the notification, access, and contest requirements of the agency procedures (under 5 U.S.C., 552a(c)(3), (d), (e)(1), (e)(4)(G), (H), and (I), and (f)). This exemption is applicable as the data are maintained by the Bureau of the Census solely as statistical records, as required under Title 13 U.S.C., and are not used in whole or in part in making any determination about an identifiable individual. This exemption is made in accordance with the Department's rules which appear in 15 CFR part 4 subpart B and in accordance with agency rules published in the rules section of this Federal Register.

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000559

COMMERCE/CENSUS-3

System Name:

Special Censuses, Surveys, and Other Studies (January 26, 2012, 77 FR 4002)

Security Classification: None.

System Location:

Bowie Computer Center, U.S. Census Bureau, 17101 Melford Blvd., Bowie, Maryland 20715, and U.S. Census Bureau, National Processing Center, 1201 East 10th Street, Jeffersonville, Indiana 47103; and National Archives and Records Administration, Washington National Records Center, Washington, DC 20409.

Categories of Individuals Covered by the System:

This system covers the population of the United States. Survey respondents typically are individuals aged 15 years old or over. Data collected directly from respondents may be supplemented with data from administrative record files received from other federal, state, or local agencies, or commercial sources. These files are collected and processed under the statistical Administrative Records system. Administrative record files are from agencies including, the Departments of Agriculture, Education, Health and Human Services, Homeland Security, Housing and Urban Development, Labor, Treasury, Veterans Affairs, and from the Office of Personnel Management, the Social Security Administration, the Selective Service System, and the U.S. Postal Service. Comparable data may also be sought from State agencies and commercial sources. Please see the COMMERCE/CENSUS-8, Statistical Administrative Records System SORN for more information. Additionally, subjects of cognitive interviews (to test understanding of a new survey form, for example) are covered in this system of records.

Categories of Records in the System:

Records in this system of records consist of working statistical files (i.e., those files being analyzed to produce survey results), survey data files (i.e., those files containing answers directly from the respondent), and/or data contact files (i.e., those files used for contacting respondents). Records in this system of records may contain information such as: Respondent contact information--telephone number, email address; Demographic information--date of birth, sex, race, ethnicity, household and family characteristics, mobility status, education, marital status, tribal affiliation, veteran's status, disability status; Geographical information--address and geographic codes; Health information--health problems, type of provider, services provided, cost of services, quality indicators; Economic information--housing and institutional characteristics, income, occupation, employment and unemployment information, health insurance coverage, federal and state program participation, assets and wealth; Activity and event related

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000560

information--commuting, travel, childcare, recreation, consumer expenditures, community service, drug and alcohol use, and crime victimization; Field Representative (FR) related information--U.S. Census Bureau FR code, which is used only as an administrative control item for each record. Some records in this system of records may be obtained from datasets maintained by the COMMERCE/CENSUS-8, Statistical Administrative Records System where direct identifiers have been replaced with a unique non-identifying code prior to delivery to this system of records, and, therefore are not on the working statistical files. These categories of records are maintained on unique data sets that are extracted or combined on an as needed basis using the unique non-identifying codes but with the original identifiers removed. These records may contain: Demographic information--date of birth, sex, race, ethnicity, household and family characteristics, education, marital status, Tribal affiliation, and veteran's status; Geographical information--address and geographic codes; Mortality information--cause of death and hospitalization information; Health information--type of provider, services provided, cost of services, and quality indicators; Economic information—housing characteristics, income, occupation, employment and unemployment information, health insurance coverage, Federal program participation, assets, and wealth. Another category of records contains two types of records that are maintained on unique data sets that are extracted or combined on an as-needed basis using the unique non-identifying codes but with some name information retained. One type of records contains: Business information--business name, revenues, number of employees, and industry codes in support of economic statistical products. The other type contains: Respondent contact information--name, address, telephone number, age, and sex in support of survey and census data collection efforts. See the COMMERCE/CENSUS-8, Statistical Administrative Records System SORN for more information. However, for limited short-term projects, some records obtained from datasets maintained by the COMMERCE/CENSUS-8, Statistical Administrative Records System may contain some direct identifiers (such as name, Social Security Number (SSN)) that have been retained in working statistical files for this collection. These short-term projects must present project and use proposal documentation to a team of high level managers, and obtain approval to use direct identifiers in these working statistical files. Additionally, direct identifiers collected from survey respondents are routinely maintained on data contact files in order to facilitate respondent contact or to pre-load data for a data collection instrument.

Authorities for Maintenance of the System:

Title 13 U.S.C. 8(b), 182, and 196 provide the authority for the U.S. Census Bureau to conduct statistical surveys.

Purpose(s):

The purpose of this system of records is to collect statistical information from respondents through survey instruments or other means and to conduct methodological research on improving

AMERICAN OVERSIGHT

various aspects of surveys authorized by Title 13, U.S.C. 8(b), 182, and 196, such as: survey sampling frame design; sample selection algorithms; questionnaire development, design, and testing; usability testing of computer software and equipment; post data collection processing; data quality review; and non-response research.

Routine Uses of Records Maintained in the System, Including Categories of Users and the Purposes Of Such Uses:

None. The data will be used only for statistical purposes. No disclosures which permit the identification of individual respondents, and no determinations affecting individual respondents are made.

Disclosure to Consumer Reporting Agencies: None.

Policies and Practices for Storing, Retrieving, Accessing, Retaining, and Disposing of Records in the System:

Storage:

Records (including, but not limited to, sound files of survey or cognitive interviews or electronic datasets) will be stored in a secure computerized system and on magnetic media; output data will be electronic files or paper copies. Paper copies or magnetic media will be stored in a secure area within a locked drawer or cabinet. Data sets may be accessed only by authorized personnel. Control lists will be used to limit access to those employees with a need to know; rights will be granted based on job functions.

Retrievability:

A limited number of sworn U.S. Census Bureau staff will be permitted to retrieve records containing direct identifiers (such as a name or SSN). Staff producing final statistical products will have access only to data sets from which direct identifiers have been deleted and replaced by unique non-identifying codes internal to the U.S. Census Bureau.

Safeguards:

The U.S. Census Bureau is committed to respecting respondent privacy and protecting confidentiality. Through the Data Stewardship Program, we have implemented management, operational, and technical controls and practices to ensure high-level data protection to respondents of our census and surveys. (1) An unauthorized browsing policy protects respondent information from casual or inappropriate use by any person with access to Title 13 protected data. (2) All employees permitted to access the system are subject to the restriction, penalties, and prohibitions of 13 U.S.C. 9 and 214, as modified by Title 18 U.S.C. 3551, et seq.; the Privacy Act of 1974 (5 U.S.C. 552a(b)(4)); and when applicable, Title 26 U.S.C. 7213, 7213A, and 7431; as well as any additional restrictions imposed by statutory authority of a sponsor. (3)

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000562

All U.S. Census Bureau employees and persons with special sworn status will be regularly advised of regulations issued pursuant to Title 13 U.S.C. governing the confidentiality of the data, and will be required to complete an annual Title 13 awareness program; and those who have access to Federal Tax Information data will be regularly advised of regulations issued

pursuant to Title 26 U.S.C. governing the confidentiality of the data, and will be required to complete an annual Title 26 awareness program. (4) All computer systems that maintain sensitive information are in compliance with the Federal Information Security Management Act, which includes auditing and controls over access to restricted data. (5) The use of unsecured telecommunications to transmit individually identifiable information is prohibited. (6) Paper copies that contain sensitive information are stored in secure facilities in a locked

drawer or file cabinet behind a locked door. (7) Additional data files containing direct identifiers will be maintained solely for the purpose of data collection activities, such as respondent contact and pre-loading an instrument for a continued interview, and will not be transferred to, or maintained on, working statistical files. (8) Any publications based on this system will be cleared for release under the direction of the U.S. Census Bureau's Disclosure Review Board, which will confirm that all the required disclosure avoidance procedures have been implemented and no information that identifies any individual is released.

Retention and Disposal:

Records are to be retained in accordance with the General Records Schedule and U.S. Census Bureau's records control schedules that are approved by the National Archives and Records Administration. Generally, records are retained for less than 10 years, unless a longer period is necessary for statistical purposes or for permanent archival retention.

System Manager and Address:

Associate Director for Demographic Programs, U.S. Census Bureau, 4600 Silver Hill Road, Washington, DC 20233-8000.

Notification Procedure: None.

Record Access Procedures: None.

Contesting Record Procedures: None.

Record Source Categories:

Individuals and populations covered by selected administrative records systems and U.S. Census Bureau surveys and special censuses.

AMERICAN OVERSIGHT

Exemptions Claimed for this System:

Pursuant to Title 5 U.S.C. 552a(k)(4), this system of records is exempted from the notification, access, and contest requirements of the agency procedures (under 5 Title U.S.C. 552a(c)(3), (d), (e)(1), (e)(4)(G), (H), and (I), and (f)). This exemption is applicable as the data are maintained by the U.S. Census Bureau and required by Title 13 to be used solely as statistical records and are not used in whole or in part in making any determination about an identifiable individual. This exemption is made in accordance with the Department's rules, which appear in 15 CFR part 4 subpart B, and in accordance with agency rules published in the rules section of this Federal Register.

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000564

DUA: RSCH-2011-21550

MAIN INFORMATION

DUA Number: RSCH-2011-21550
DUA Customer Type: Researcher
DUA Category : 55 - NON DHHS AGENCIES - CENSUS, DOD, EPA, SSA, VA ...
DUA Status: Approved
Request entered by: Carolina Malasheskie
Requested Date: 9/19/2019
Expiration Date: 10/12/2020
Requester: Michael Berning
Requester Organization Name: United States Census Bureau
Requester Email Address: michael.a.berning@census.gov
Requester Phone Number: (301) 763-2028

Project Name: CENSUS BUREAU ACTIVITIES PURSUANT TO THE PROVISIONS OF TITLE 13
Privacy Act Authorization Code: CENSUS
HIPAA Authorization Code: Research

ResDAC Information

ResDAC TicketID : OCX-186-75736.

ResDAC Executive Advisor(EA)

Name: Jennifer Koper
Email: ResDAC@umn.edu
Phone Number: (888) 973-7322
Phone Number Ext :

ResDAC Technical Advisor(TA)

Name: n/a n/a
Email: ResDAC@umn.edu
Phone Number: (888) 973-7322
Phone Number Ext :

Principal Investigator

Primary Principal Investigator

Name: Lori Fox
Email: Lori.Anne.Fox@census.gov
Phone Number: 3017633404
Phone Number Ext :

CO Principal Investigator

Name: Epaphrodite Uwimana
Email: epaphrodite.uwimana@census.gov

AMERICAN OVERSIGHT

Phone Number: 3017636064
Phone Number Ext :

CMS Contact (COR)

COR PROXY

First Name	Last Name	Organization Name	Email Address	Phone Number

Collaborating Organization

1. United States Census Bureau

FUNDING

DOCUMENTS

ID	Document	Date and Time
1	DUA_21550_Addendum_Berning.pdf	Mar 24, 2017 01:37:32 PM
2	DUA_21550_Addendum_OHara.pdf	Mar 24, 2017 01:41:49 PM
3	DUA_21550_Addendum_Fox.pdf	Sep 18, 2019 03:42:09 PM
4	02_AMEND_Exec_Summ_OCX-186-75736.docx	Oct 13, 2017 01:35:38 PM

CUSTODIANS/ DESY USERS

ID	User Name	EUA User Id	Organization	Email Address	Phone Number	Address
1	Lori Fox		United States Census Bureau	Lori.Anne.Fox@census.gov	(301) 763-3404	4600 SILVER HILL ROAD, WASHINGTON, District of Columbia, 20233, USA

DATA FILE DESCRIPTION

ID	Data File Description	From Year	To Year	Quarter(s)	Extraction %	Re-Used From DUA	Access Type	Status	Disposition Reason
1	MSIS - MEDICAID STATISTICAL INFORMATION SYSTEM	2002	2014		Migrated from DADSS - NA.		SHIPPING	Open	

PENDING DATA FILE DESCRIPTION

ID	Data File Description	From Year	To Year	Quarter(s)	Extraction %	Re-Used From DUA	Access Type	Status	Disposition Reason

REQUESTER PROXY

First Name	Last Name	Organization Name	Email Address	Phone Number

AMERICAN OVERSIGHT

DUA Life Cycle

DUA Status	DUA Action Date	DUA Action	Action User	Comments
Approved	Thu Sep 19 11:42:41 EDT 2019	UPDATE DUA	Carolina Malasheskie	Per Michael A Berning (CENSUS/ERD FED)
In Progress	Thu Sep 19 11:40:33 EDT 2019	UPDATE DUA	Carolina Malasheskie	
In Progress	Wed Sep 18 15:49:06 EDT 2019	UPDATE DUA	Carolina Malasheskie	
In Progress	Wed Sep 18 15:48:53 EDT 2019	UPDATE DUA	Carolina Malasheskie	
In Progress	Wed Sep 18 15:47:35 EDT 2019	UPDATE DUA	Carolina Malasheskie	
In Progress	Wed Sep 18 15:46:12 EDT 2019	UPDATE DUA	Carolina Malasheskie	
Approved	Wed Sep 18 15:43:04 EDT 2019	UPDATE DUA	Carolina Malasheskie	Per Michael A Berning (CENSUS/ERD FED)
In Progress	Wed Sep 18 15:42:14 EDT 2019	UPDATE DUA	Carolina Malasheskie	
In Progress	Wed Sep 18 10:22:39 EDT 2019	UPDATE DUA	Carolina Malasheskie	

AMERICAN OVERSIGHT

DUA Status	DUA Action Date	DUA Action	Action User	Comments
In Progress	Wed Sep 18 10:22:27 EDT 2019	UPDATE DUA	Carolina Malasheskie	
In Progress	Wed Sep 18 10:18:48 EDT 2019	UPDATE DUA	Carolina Malasheskie	
Approved	Wed Sep 18 10:16:37 EDT 2019	EXTEND DUA	Carolina Malasheskie	Per Michael A Berning (CENSUS/ERD FED) <Michael.A.Berning@census.gov>; Extended DUA per email; 09/18/2019.
Approved	Tue Sep 04 14:21:57 EDT 2018	EXTEND DUA	Carolina Malasheskie	Per Michael A Berning (CENSUS/ERD FED) <Michael.A.Berning@census.gov>; Extended DUA per email; 08/29/2018.
Approved	Wed Oct 18 13:26:11 EDT 2017	UPDATE DUA	Carolina Malasheskie	Per Michael A Berning (CENSUS/CARRA FED) <Michael.A.Berning@census.gov>; "Please remove Amy O'Hara as the requestor of the selected DUA, she is no longer associated with the Census Bureau. Please add Michael Berning as the new requester. All other names on DUA will remain the same, except for Michael Berning, please remove his name as the additional data custodian from this DUA since he will now be the requestor." per email; Changed DUA Requestor from Amy O'Hara to Michael Berning. Removed Michael from the custodian level from the DUA; 10/11/2017.
In Progress	Wed Oct 18 13:24:42 EDT 2017	UPDATE DUA	Carolina Malasheskie	Per Michael A Berning (CENSUS/CARRA FED) <Michael.A.Berning@census.gov>; "Please remove Amy O'Hara as the requestor of the selected DUA, she is no longer associated with the Census Bureau. Please add Michael Berning as the new requester. All other names on DUA will remain the same, except for Michael Berning, please remove his name as the additional data custodian from this DUA since he will now be the requestor.
In Progress	Wed Oct 18 13:22:40 EDT 2017	UPDATE DUA	Carolina Malasheskie	
In Progress	Wed Oct 18 13:22:05 EDT 2017	UPDATE DUA	Carolina Malasheskie	
Approved	Tue Oct 17 15:17:53 EDT 2017	EXTEND DUA	Carolina Malasheskie	Per Michael A Berning (CENSUS/CARRA FED) <Michael.A.Berning@census.gov>; Extended DUA per email; 10/11/2017.

AMERICAN OVERSIGHT

DUA Status	DUA Action Date	DUA Action	Action User	Comments
Expired	Fri Oct 13 22:10:01 EDT 2017		System	
Approved	Fri Oct 13 13:43:11 EDT 2017	UPDATE DUA	Cheryl Sample	CMS Request Tracking #20170314-520C/ResDAC Ticket ID OCX-186-75736. This update is only to add an executive summary to the DUA file due to the original not being on file. Updated EPPE DUA to reflect John Moulton as Study PI and to include Epaphrodite Uwimana as a Point of Contact for the purpose of being notified when there is a need for a DUA extension.
In Progress	Fri Oct 13 13:39:49 EDT 2017	UPDATE DUA	Cheryl Sample	
In Progress	Fri Oct 13 13:36:16 EDT 2017	UPDATE DUA	Cheryl Sample	
In Progress	Fri Oct 13 13:34:03 EDT 2017	UPDATE DUA	Cheryl Sample	
Approved	Fri Mar 24 13:44:51 EDT 2017	UPDATE DUA	Carolina Malasheskie	Per G Patricia De La Cruz (CENSUS/CARRA FED) <G.Patricia.De.La.Cruz@census.gov>; Addendum to change the DUA Requestor to Amy O'Hara and removed Trent Alexander as a custodian. Added two custodians: John Moulton and Mike Berning to the DUA.
In Progress	Fri Mar 24 13:41:57 EDT 2017	UPDATE DUA	Carolina Malasheskie	
In Progress	Fri Mar 24 13:35:48 EDT 2017	UPDATE DUA	Carolina Malasheskie	
In Progress	Fri Mar 24 13:34:10 EDT 2017	UPDATE DUA	Carolina Malasheskie	
In Progress	Fri Mar 24 13:31:39 EDT 2017	UPDATE DUA	Carolina Malasheskie	

AMERICAN OVERSIGHT

DUA Status	DUA Action Date	DUA Action	Action User	Comments
In Progress	Fri Mar 24 13:30:20 EDT 2017	UPDATE DUA	Carolina Malasheskie	
In Progress	Fri Mar 24 13:29:52 EDT 2017	UPDATE DUA	Carolina Malasheskie	
Approved	Thu Oct 13 14:37:48 EDT 2016	EXTEND DUA	Carolina Malasheskie	Per J Trent Alexander (CENSUS/CARRA FED) <J.Trent.Alexander@census.gov>; Extended DUA per email; 10/12/2016.
Approved	Tue Nov 24 09:17:55 EST 2015	EXTEND DUA	CAROLINA MALASHESKIE	
Approved	Tue Nov 24 09:17:37 EST 2015	UPDATE DUA	CAROLINA MALASHESKIE	
Approved	Wed Jul 15 15:55:20 EDT 2015	UPDATE DUA	SHARON KAVANAGH	
Approved	Tue Jan 27 02:01:02 EST 2015	UPDATE DUA	SHARON KAVANAGH	
Approved	Mon Jul 28 12:24:32 EDT 2014	UPDATE DUA	Karen Foster	
Approved	Tue Jul 22 14:19:18 EDT 2014	UPDATE DUA	THOMAS LATELLA	
Approved	Fri Jan 31 02:40:56 EST 2014	UPDATE DUA	SHARON KAVANAGH	

AMERICAN OVERSIGHT

DUA Status	DUA Action Date	DUA Action	Action User	Comments
Approved	Mon Jan 28 10:44:19 EST 2013	EXTEND DUA	CAROLINA MALASHESKIE	
Approved	Mon Jan 28 10:43:46 EST 2013	UPDATE DUA	CAROLINA MALASHESKIE	
Approved	Fri Jan 25 02:27:15 EST 2013	UPDATE DUA	SHARON KAVANAGH	
Approved	Wed Jul 11 09:48:18 EDT 2012	UPDATE DUA	BETTY DAVIS	
Approved	Tue May 08 11:22:40 EDT 2012	UPDATE DUA	JOYCE GUNTHROP	
Approved	Fri Mar 02 15:47:47 EST 2012	UPDATE DUA	JOYCE GUNTHROP	
Approved	Wed Feb 29 09:31:31 EST 2012	UPDATE DUA	BETTY DAVIS	
Approved	Wed Feb 29 09:29:13 EST 2012	UPDATE DUA	BETTY DAVIS	
Approved	Tue Feb 21 17:17:43 EST 2012	EXTEND DUA	JOYCE GUNTHROP	
Approved	Fri Sep 23 16:37:54 EDT 2011	UPDATE DUA	SHARON KAVANAGH	

AMERICAN OVERSIGHT

DUA Status	DUA Action Date	DUA Action	Action User	Comments
Approved	Sat Jul 09 15:19:12 EDT 2011	UPDATE DUA	SHARON KAVANAGH	
Approved	Wed Jun 22 14:44:01 EDT 2011	UPDATE DUA	SHARON KAVANAGH	
Approved	Wed Jun 22 14:42:22 EDT 2011	UPDATE DUA	SHARON KAVANAGH	
Approved	Wed Jun 22 14:37:27 EDT 2011	EXTEND DUA	SHARON KAVANAGH	
Approved	Wed Jun 22 14:25:50 EDT 2011	CREATE DUA	SHARON KAVANAGH	

DADSS Comments

Comment	Comment Date	User
replacement for DUA 15896 which could not be extended due to being outside of the 365 day window for possible extension.	Wed Jun 22 14:25:50 EDT 2011	SHARON KAVANAGH
Since this is a replacement of DUA 15896 whose original creation date was 1-20-2006 and expiration date was 4-20-2010, the creation date for this DUA was 1 day and then extended until 4-19-2012 to be inline with what the next expiration should have been.	Wed Jun 22 14:42:22 EDT 2011	SHARON KAVANAGH
Request for extension of DUA 15896 was sent to Damien Marston 6-22-2011 via email	Wed Jun 22 14:44:01 EDT 2011	SHARON KAVANAGH
The DUA EXPIRATION DATE has been modified per the DataUseAgreement team, per new directive given by CMS Deputy Chief Information Officer (CIO) June 23, 2011.	Fri Sep 23 16:37:54 EDT 2011	SHARON KAVANAGH
Per the 2/21/12 request from Stefon Nicely, added Theresa Leslie as Custodian. Removed Custodians James Gibbs and Karen Medina.	Wed Feb 29 09:31:31 EST 2012	BETTY DAVIS
Requestor changed to Karen Medina per addendum received 3/2/12.	Fri Mar 02 15:47:47 EST 2012	JOYCE GUNTHROP

AMERICAN OVERSIGHT

Comment	Comment Date	User
Updated custodian and requestor per email received 5/8/2012.	Tue May 08 11:22:40 EDT 2012	JOYCE GUNTHROP
Theresa Leslie, Data Custodian, was removed on various DUAs per Stefon T. Nicely's request on 7/5/12. Stefon's update request for David Donovan as Requestor and J. Trent Alexander as Custodian had already been updated on a prior date.	Wed Jul 11 09:48:18 EDT 2012	BETTY DAVIS
PER DADSS GTL, BATCH JOB CHANGED THE CMS CONTACT FROM DAMIEN MARSTON TO SHARON KAVANAGH	Fri Jan 25 02:27:15 EST 2013	SHARON KAVANAGH
Extended DUA per email request from hampton.wilson.iii@census.gov on 01/28/2013.	Mon Jan 28 10:43:46 EST 2013	
Extended per email received between Jan 23-29 2014 from j.trent.alexander@census.gov	Fri Jan 31 02:40:56 EST 2014	SHARON KAVANAGH
CMS CONTACT changed from Sharon Kavanagh to Joseph Brewer. Email from Brewer, Joseph (CMS/OIS) 7/22/2014	Tue Jul 22 14:19:18 EDT 2014	
Added 2003-2014 MSIS. Note: 2002 MSIS was added to this DUA when it wa created in 2011; however, analyst who processed the action did not make mention of this in the comments section.	Mon Jul 28 12:24:32 EDT 2014	Karen Foster
Extended per email received between Jan 16 - Jan 23, 2015 from J Trent Alexander (CENSUS/CES FED)	Tue Jan 27 02:01:02 EST 2015	SHARON KAVANAGH
per email from Herzog, Sheryl (CMS/OTS) June 24, 2015, changed CMS contact from Joe Brewer to myself and added J.Trent.Alexander@census.gov as the contact from Census	Wed Jul 15 15:55:20 EDT 2015	SHARON KAVANAGH
Extended DUA per email; J Trent Alexander (CENSUS/CES FED) ; 11/24/2015.	Tue Nov 24 09:17:37 EST 2015	
Per J Trent Alexander (CENSUS/CARRA FED) ; Extended DUA per email; 10/12/2016.	Thu Oct 13 14:36:50 EDT 2016	

AMERICAN OVERSIGHT

AMERICAN OVERSIGHT

UNITED STATES GOVERNMENT
GENERAL TERMS & CONDITIONS (GT&C)
FS Form 7600A

BUREAU OF THE Fiscal Service
U.S. DEPARTMENT OF THE TREASURY

Agreement Between Federal Program Agencies for Intragovernmental Reimbursable, Buy/Sell Activity. In Accordance with TFM Volume 1, Part 2, Chapter 4700, Appendix 6, Section 9.

https://www.fiscal.treasury.gov/fsservices/gov/acctg/g_invoice/g_invoice_home.htm

G-Invoicing Required Fields have an (*)

NEW OR MODIFIED GT&C			
*General Terms and Conditions (GT&C) Number		GT&C Number:	
		Modification Number: 0	
AGENCY INFORMATION			
1.		Requesting Agency (Buyer)	Servicing Agency (Seller)
	*Agency Identifier (AID)	013	075
	*Agency Location Code (ALC)	13040001	75050080
	*Agency Name	Department of Commerce U.S. Census Bureau (Census Bureau)	Centers for Medicare & Medicaid Services (CMS)
	*Agency Address	4600 Silver Hill Road Suitland, MD 20746	7500 Security Boulevard, Baltimore, MD 21244
	Cost Center	Economic Reimbursable Surveys Division (ERD)	Office of Enterprise Data & Analytics (OEDA)
	Business Unit		
	Department ID		
GT&C INFORMATION			
2.	GT&C Title	Reimbursement for CMS data	
3.	Agency Agreement Tracking Number	2064-20-PAY-03	IA20-48
4.	*Agreement Period	Start Date (mm/dd/yyyy): Upon final signa	End Date (mm/dd/yyyy): 09/30/2020
5.	Termination Days	30	
6.	*Agreement Type	(•) Single Order ( ) Multiple Order	
7.	*Advance Payment Indicator	Are Advance Payments allowed for this GT&C? ( ) Yes (•) No *If "Yes", the Requesting Agency Advance Payment Authority Title and Citation are required upon creation of an Order against this GT&C.	
8.	*Assisted Acquisition Indicator	Will this GT&C accommodate Assisted Acquisitions? ( ) Yes (•) No *If "Yes", the Servicing Agency provides acquisition support in awarding and managing contracts on behalf of the Requesting Agency's requirements for products or services. Lines 17 & 18 below for additional detail.	
ESTIMATED AGREEMENT AMOUNT			
9.	Total Direct Cost Amount	$10,500.00	
	Total Overhead Fees and Charges Amount	$0.00	
	*Total Estimated Amount	$10,500.00	

AMERICAN OVERSIGHT

	Enforce Total Remaining Amount	Should G-Invoicing enforce the total value of orders to remain below the Total Amount on the GT&C? (●) Yes ( ) No If "Yes", G-Invoicing will not allow Order total to exceed the GT&C total.
ADDITIONAL AGREEMENT INFORMATION		
10.	Explanation of Overhead Fees and Charges	
11.	Requesting Scope	Under this Interagency Agreement (IAA), CMS will provide the Census Bureau with certain Medicare Enrollment Data from the Medicare Enrollment Database (MEDB) for 2018, 2019, and 2020 from the Chronic Condition Warehouse/Virtual Research Data Center (CCW/VRDC). The requesting organization will conform with all of CMS's data release policies and procedures and has executed Data Use Agreement (DUA) RSCH-2008-18931 (Attachment I) to that effect, which is hereby incorporated into, and is part of, this agreement, and which is attached as an addendum hereto. CMS will make the appropriate minimally necessary data available to approved users once all CMS data requirements are met. Census Bureau will use the data with information from census and survey respondents, information from federal and state agencies, and information from third party vendors for statistical purposes only. The Census Bureau intends to use data acquired under this agreement at Census Bureau Headquarters in Suitland, Maryland, and in the Research Data Center (RDC) Network. Only Census Bureau employees and Title 13, U.S.C. Section 23(c) Special Sworn Status researchers working on approved projects will access data acquired under this agreement. Under this IAA, CMS will provide the Census Bureau with the requested data as permitted or required by applicable law. Census Bureau, in turn, agrees to never disclose CMS' data outside Census Bureau except as required by applicable law or as permitted by this agreement and the DUA RSCH-2008-18931 (Attachment I). Furthermore, Census Bureau agrees to limit use of CMS' data to what is permitted under applicable law, this agreement and the attached DUA. In addition, refer to the CCW Cost Invoice (Attachment II), MEDICARE Enrollment Database General File Requirements (Attachment III), MEDB File Layout (Attachment IV), and the Census Bureau System(s) of Records (SORs) Commerce/Census-8 and Commerce/Census-3 (Attachment V).
12.	Requesting Roles	To identify the individuals and the Census Bureau's desired data elements about those individuals, Census Bureau will submit a data request annually to the Research Data Assistance Center (ResDAC). In providing such requests, Census Bureau should allow sufficient time for the review and approval of the data request, and time for processing of the data.
13.	Servicing Roles	CMS will provide the Census Bureau with the requested data from the CCW/ VRDC. In response to Census Bureau's data requests, CMS will provide 2018, 2019, and 2020 MEDB User View Files, 2018, 2019, and 2020 Identifier Crosswalk Beneficiary Identification (BENE ID) to Health Insurance Claim (HIC) files, and 2018, 2019, and 2020 Identifier Crosswalk BENE ID to Social Security Number (SSN) files for the individuals covered by the data request.
14.	Restrictions	Refer to the IAA Addendum.
15.	Assisted Acquisition Small Business Credit Clause	The Servicing Agency will allocate the socio-economic credit to the Requesting Agency for any contract actions it has executed on behalf of the Requesting Agency.
16.	Disputes	Disputes related to this GT&C and any related Orders shall be resolved in accordance with instructions provided in the Treasury Financial Manual (TFM) Volume I, Part 2, Chapter 4700, Appendix 6; Intragovernmental Transaction (IGT) Guide, at http://tfm.fiscal.treasury.gov/content/tfm/v1/p2/c470.html

AMERICAN OVERSIGHT

17.	Requesting Assisted Acquisitions	
18.	Servicing Assisted Acquisitions	
19.	Requesting Clauses	
20.	Servicing Clauses	CMS does not allow pen and ink changes or altering to this agreement after any signatures have been obtained. Changes that occur in any section from the approved version to the final signed version will not be accepted by CMS. If changes are required to this agreement, please contact the CMS Contracting Officer Representative (COR) to have the agreement changes routed for the Office of Acquisition and Grants Management (OAGM) re-approval. In addition, refer to the IAA Addendum.

CLOSE GT&C	
21.	Closing Date (mm/dd/yyyy):
	Brief explanation required for closing this GT&C prior to the original End Date resulting in early termination:

PREPARER INFORMATION		
22.	*Prepared Name	G. Patricia de la Cruz
	*Prepared Phone	+1 (301) 763-2377
	*Prepared E-mail	g.patricia.de.la.cruz@census.gov

AMERICAN OVERSIGHT

General Terms and Conditions (GT&C) Number: _____

AGREEMENT APPROVALS			
By signing this agreement, you authorize the General Terms and Conditions as stated, and that the scope of the work can be fulfilled. By signing, you agree to periodically review the terms and conditions of the agreement and make any necessary modifications to the GT&C and any affected Order(s).			
		Requesting Initial Approval (required)	Servicing Initial Approval (required)
23.	*Date (mm/dd/yyyy)	See Section 24 for Census	See Section 24 for CMS
	*Approver's Name		
	*Signature:		
	Title		
	*E-mail		
	*Phone		
	Fax		
		Requesting Final Approval (required)	Servicing Final Approval (required)
24.	*Date (mm/dd/yyyy)	01/30/2020	
	*Approver's Name	Kevin Deardorff	Andy Shatto
	*Signature:	[signature]	Andrew E. Shatto -S Digitally signed by Andrew E. Shatto -S Date: 2020.01.30 15:39:55 -05'00'
	Title	Division Chief, ERD	Deputy Director, Office of Enterprise Data & Analytics
	*E-mail	kevin.e.deardorff@census.gov	Andrew.Shatto@cms.hhs.gov
	*Phone	+1 (301) 763-6033	+1 (410) 786-6384
	Fax		

AMERICAN OVERSIGHT

UNITED STATES GOVERNMENT
ORDER FORM
FS FORM 7600B

BUREAU OF THE Fiscal Service
U.S. DEPARTMENT OF THE TREASURY

Agreement Between Federal Program Agencies for Intragovernmental Reimbursable, Buy/Sell Activity.
In Accordance with TFM Volume 1, Part 2, Chapter 4700, Appendix 6, Section 9.
https://www.fiscal.treasury.gov/g-invoice/

G-Invoicing Required Fields have an (*)

NEW OR MODIFIED ORDER			
1.	*Order Number	Order Number:	
		Modification Number:	
2.	*General Terms & Conditions (GT&C) Number (Associated with this Order):		
3.	*Order Date (YYYY-MM-DD):	01/15/2020	
PARTNER INFORMATION			
4.	*Assisted Acquisition Indicator	○ Yes ◉ No	
5.	*Period of Performance	Start Date: Upon Final Signature	End Date: 2020-09-30
		Requesting Agency (Buyer)	Servicing Agency (Seller)
6.	*Agency Location Code (ALC)	13040001	75050080
7.	*Agency Name	Department of Commerce U.S. Census Bureau (Census Bureau)	Centers for Medicare & Medicaid Services (CMS)
8.	Cost Center	Economic Reimbursable Surveys Division (ERD)	Office of Enterprise Data & Analytics (OEDA)
9.	Business Unit		
10.	Department ID		
11.	Order Tracking Number	2064-20-PAY-03	IA20-48
12.	Agency Business Partner Network (BPN)	929955383	927645622
AUTHORITY INFORMATION			
		Requesting Agency (Buyer)	Servicing Agency (Seller)
13.	*Statutory Authority Fund Type Code	○ Franchise Fund ○ Revolving Fund ○ Economy Act ◉ Other Authority ○ Working Capital Fund	○ Franchise Fund ○ Revolving Fund ○ Economy Act ◉ Other Authority ○ Working Capital Fund
14.	Statutory Authority Fund Type Title	Section 1106(b) of the Social Security Act	Section 1106(b) of the Social Security Act
15.	Statutory Authority Fund Type Citation		
16.	Program Authority Title	Refer to the IAA Addendum	Records maintained on individuals
17.	Program Authority Citation	Refer to the IAA Addendum	5 U.S.C 552a(b)(4)
ADVANCE INFORMATION (Required by Serving Agency if there is an advance.)			
18.	Advance Revenue Recognition Methodology	○ Straight Line ○ Accrual per Work Completed ○ Monthly ○ Other	
19.	Advance Revenue Recognition Description (required if "Other")		
20.	Advance Payment Authority Title		

AMERICAN OVERSIGHT

Order Number: _____

21.	Advance Payment Authority Citation	
22.	Total Advance Amount	

DELIVERY INFORMATION (Requesting Agency completes this section.)

23.	*FOB Point	○ Source/Origin ◉ Destination ○ Other
24.	Constructive Receipt Days	30 (Calendar Days) *Required if Destination/Other is checked on line 23.
25.	Acceptance Point	○ Source/Origin ◉ Destination ○ Other
26.	Place of Acceptance	
27.	Inspection Point	○ Source/Origin ◉ Destination ○ Other
28.	Place of Inspection	

ORDER BILLING (Servicing Agency completes.)

29.	*Billing Frequency	Please Select One: OTHER
30.	Billing Frequency Explanation	This is a one time billing. CMS will invoice when the DUA and data request are approved by September 30, 2020.

ORDER BILLING (Requesting Agency completes.)

31.	Priority Order Indicator	○ Yes ◉ No
32.	Capital Planning and Investment Control (CPIC)	○ Yes ◉ No

LINE ITEMS (Additional Lines/Schedules may be added using the + button after Block 93)

33.	*Line Number	0001
34.	Order Line Status	ACTIVE
35.	*Item Code	9999
36.	*Item Description	Miscellaneous Item - CMS Data
37.	*Line Costs Unit of Measure (UOM)	DOL
38.	*Unit of Measure (UOM) Description	USD Dollars
39.	Total Line Costs	$10,500.00
40.	Order Line Advance Amount	
41.	Product/Service Identifier	
42.	*Capitalized Asset Indicator	NO
43.	Item UID Required Indicator	
44.	*Type of Service Requirements	SEVERABLE

SCHEDULE SUMMARY (Additional Lines/Schedules may be added using the + button after Block 93)

45.	*Schedule Number	0001
46.	Advance Pay Indicator	No
47.	*Cancel Status (schedule)	ACTIVE
48.	*Schedule Unit Cost/Price	DOL
49.	*Order Schedule Quantity	1
50.	Order Schedule Amount	$10,500

SCHEDULE FUNDING INFORMATION

		Requesting Agency (Buyer)	Servicing Agency (Seller)

AMERICAN OVERSIGHT

Order Number: _____

51.	*Agency TAS	SP	ATA	AID	BPOA	EPOA	A	MAIN	SUB	SP	ATA	AID	BPOA	EPOA	A	MAIN	SUB
				013	2020	2022		0450	000			075	2020	2020		0511	000
52.	*Agency Business Event Type Code (BETC)	DISB								COLL							
53.	Agency Business Partner Network (BPN) + 4	5383								5622							
54.	Object Class Code	2530								2538							
55.	Additional Accounting Classification	EIN: 53-0204537 CAN: 5995932 BPN: 929955383 25-30-07-00 Object Class Code 6750F01 Project Code								CAN: 5991341 CMS Internal Object Class Code: 25308 BAP: 2200320000 PAC: 0440 EIN: 52-0883104							
56.	*Description of Products and/or Services, including Bona Fide Need for this order. (Buyer only)	Funding to acquire MEDB data from CMS. Refer to the IAA Addendum and DUA. $10,500 for FY20.															

SLOA INFORMATION (*To capture Agency Internal Accounting)			
57.	Accounting Classification Reference Number		
58.	Reimbursable Flag	○ Yes ○ No	
		Requesting Agency (Buyer)	Servicing Agency (Seller)
59.	Federal Award Identifier Number (FAIN)		
60.	Unique Record Identifier (URI)		
61.	Activity Address (AAC)		
62.	Budget Line Item		
63.	Budget Fiscal Year		
64.	Security Cooperation (FMS)		
65.	Security Cooperation Implementing Agency Code		
66.	Sub-Allocation		
67.	Agency Accounting Identifier		
68.	Funding Center Identifier		
69.	Cost Center Identifier		
70.	Project Identifier		
71.	Activity Identifier		
72.	Cost Element Code		
73.	Work Order Number		
74.	Functional Area		
75.	Agency Security Cooperation Case Designator		
76.	Parent Award Identifier (PAID)		

AMERICAN OVERSIGHT

Order Number: _____

77.	Procurement Instrument Identifier (PIID)		
SCHEDULE SHIPPING INFORMATION			
78.	Ship To Address Identifier		
79.	Ship To Agency Title		
80.	Address 1		
81.	Address 2		
82.	Address 3		
83.	Ship To City		
84.	Ship To Postal Code		
85.	Ship To State	Maryland	
86.	Ship To Country Code		
87.	Ship To Location Description		
88.	Delivery/Shipping Information for Product Special Shipping Information		
89.	Delivery/Shipping POC Name		
90.	Delivery/Shipping Information for Product POC Title		
91.	Delivery/Shipping Information for Product POC E-mail Address		
92.	Delivery/Shipping Information for Product POC Telephone Number		
93.	Agency Additional Information		

AMERICAN OVERSIGHT

Order Number: _____

AGENCY POINT OF CONTACTS (POC)			
		Requesting Agency (Buyer)	Servicing Agency (Seller)
94.	*Agency POC Name	Michael Berning	Cara Petroski
	*Agency POC E-mail	michael.a.berning@census.gov	cara.petroski@cms.hhs.gov
	*Agency POC Phone No.	+1 (301) 763-2028	+1 (410) 786-0305
	Agency POC Fax No.		

AGREEMENT APROVALS			
FUNDING OFFICIAL			
The Funds Approving Officials, as identified by the Requesting Agency and Servicing Agency, certify that the funds are accurately cited and can be properly accounted for per the purposes set forth in the Order. The Requesting Agency Funding Official signs to obligate funds. The Servicing Agency Funding Official signs to start the work, and to bill, collect, and properly account for funds from the Requesting Agency, in accordance with the agreement.			
		Requesting Agency (Buyer)	Servicing Agency (Seller)
95.	*Funding Official Name	Kevin Deardorff	Alisha Williams
	*Signature	K Deardorff 1/30/2020	Alisha Williams -S Digitally signed by Alisha Williams -S Date: 2020.01.17 11:38:03 -05'00'
	Funding Official Title	Division Chief, ERD	Funding Official
	*Funding Official E-mail	kevin.e.deardorff@census.gov	Alisha.Williams@cms.hhs.gov
	*Funding Official Phone No.	+1 (301) 763-6033	+1 (410) 786-7507
	Funding Official Fax No.		
	*Funding Official Date Signed		

PROGRAM OFFICIAL			
The Program Officials, as identified by the Requesting Agency and Servicing Agency, must ensure that the scope of work is properly defined and can be fulfilled for this Order. The Program Official may or may not be the Contracting Officer depending on each agency's IAA business process.			
		Requesting Agency (Buyer)	Servicing Agency (Seller)
96.	*Program Official Name	Kevin Deardorff	Andy Shatto
	*Signature	K Deardorff 1/30/2020	Andrew E. Shatto -S Digitally signed by Andrew E. Shatto -S Date: 2020.01.30 15:40:52 -05'00'
	Program Official Title	Division Chief, ERD	Deputy Director, OEDA
	*Program Official E-mail	kevin.e.deardorff@census.gov	Andrew.Shatto@cms.hhs.gov
	*Program Official Phone No.	+1 (301) 763-6033	+1 (410) 786-6384
	Program Official Fax No.		
	*Program Official Date Signed		

AGENCY PREPARER INFORMATION		
		Requesting Agency (Buyer)
97.	*Name	G. Patricia De la Cruz
	*Phone No.	+1 (301) 763-2377
	*E-mail Address	g.patricia.de.la.cruz@census.gov

AMERICAN OVERSIGHT

ADDENDUM TO THE FS 7600A & 7600B
INTERAGENCY AGREEMENT
between
The Department of Commerce
United States Census Bureau
And
The U.S. Department of Health and Human Services
The Centers for Medicare & Medicaid Services (CMS)

Census Bureau IAA Number: 2064-20-PAY-03
CMS IAA Number: IA20-48

I. PURPOSE

The purpose of this Interagency Agreement (IAA) is to delineate the terms and conditions by which the Centers for Medicare & Medicaid Services (CMS) agrees to provide certain Medicare Enrollment Data from the Medicare Enrollment Database (MEDB) for 2018, 2019, and 2020 to the Department of Commerce, U.S. Census Bureau (Census Bureau) in support of Census Bureau research.

II. INTEGRATION

The signed 7600A, 7600B, this Addendum, Data Use Agreement (DUA) RSCH-2008-18931 (Attachment I), the CCW Cost Invoice (Attachment II), MEDICARE Enrollment Database General File Requirements (Attachment III), MEDB File Layout (Attachment IV), and the Census Bureau System(s) of Records (SORs) Commerce/Census-8 and Commerce/Census-3 (Attachment V) constitute the entire agreement of Census Bureau and CMS with respect to its subject matter. There have been no representations, warranties, or promises made outside of this agreement. This agreement does not imply approval of any data requests and the requesting agency must still submit a data request package, which will include the appropriate DUA, to CMS for approval. This agreement will take precedence over any other documents that may be in conflict with it.

III. AUTHORITY

Census Programmatic Authority:
This agreement is made under the authority of 13, U.S.C., Section 6; Title 13, U.S.C., Section 141, 181, 182; The Privacy Act of 1974; Title 5, U.S.C., Section 552a(b)(4), which permits disclosure of records for purposes of planning or carrying out a census, survey or related activity pursuant to Title 13.

AMERICAN OVERSIGHT

IV. BACKGROUND

The Census Bureau is exploring the use of administrative records in surveys and censuses to reduce costs, reduce respondent burden, and improve data quality. Administrative records also enable the development and production of new data products that rely on data integration and modeling. The MEDB data are valuable to multiple program areas within the Census Bureau. Examples of uses in the program areas are listed below.

In the Demographic Directorate, staff use the data to produce intercensal population estimates and domestic migration statistics, and to assess the quality of health insurance coverage information collected in household surveys. MEDB provide additional information to enhance survey frames for health insurance coverage studies. In the Decennial Directorate, staff are exploring how MEDB data along with other federal, state, and private data sources to plan a complete and efficient 2020 Census. MEDB data have been used in multiple census field tests, particularly those testing advances in adaptive design survey methods. Staff in the Research and Methodology Directorate analyze the quality, coverage, and consistency of MEDB data, and also link the data to other survey and administrative records sources to explore the characteristics of enrollees and their participation in other government and state programs.

In all of these research and production uses, only aggregate statistical information released that meets Census Bureau Disclosure Avoidance Review standards.

V. DELIVERABLES

The CMS data delivery should follow the requested data pull dates and delivery schedule as well as include a record layout, SAS Procedure (PROC) Contents file, record count, and data dictionary, as listed in the General File Requirements. Also, please see the MEDB File Layout (Attachment IV).

VI. DURATION OF AGREEMENT

This agreement is effective on the date it is signed by the responsible parties and end on September 30, 2020.

VII. CONTACTS

CMS IAA Coordinator's:
Tyra C. Jeffries
CMS IAA Coordinator

CMS Office of Financial Management:
When CMS is the Requesting Agency:
Kevin Robey

AMERICAN OVERSIGHT

Phone: (410) 786-5156
tyra.jeffries@cms.hhs.gov

Accountant
410-786-9045
Kevin.Robey@cms.hhs.gov

Camille M. Henley
CMS IAA Coordinator
Phone: (410) 786-1492
Camille.Henley@cms.hhs.gov

When CMS is the Servicing Agency:
CMS RIA Collections
DAOReimbursableIA@cms.hhs.gov

Census Financial Contact:
Michael Berning
Assistant Division Chief, ERD
(301) 763-2028
Michael.a.berning@census.gov

VIII. **FUNDS**

Funds for this agreement will not exceed $10,500 for fiscal year (FY) 2020. The Census Bureau shall reimburse CMS for all services provided under the terms of this agreement.

CMS cannot begin work or bill Census Bureau through the Intra-governmental Payment and Collection (IPAC) system until receipt of the IAA signed by all parties.

The Census Bureau will be billed in full via IPAC when the DUA and data request are approved by September 30, 2020 for actual costs incurred.

Prior to the IPAC submission, CMS shall submit payment documentation in the form of an invoice which supports actual expenditures to justify the IPAC billing that will be submitted to the Census Bureau. Send this documentation to the Census Bureau's Contracting Officer Representative (COR) identified below:

Joey Morales (COR)
U.S. Census Bureau
301 763-6947
Joey.morales@census.gov

Please include the following CMS control number on the IPAC submission **IA20-48.**

IX. **DUPLICATION**

Full implementation of this agreement will not duplicate any existing agreements. The CMS, Office of Enterprise Data & Analytics confirms that there is no duplication or

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000586

conflict with any existing agreements.

X. MODIFICATION AND TERMINATION

Any modification or amendment of this agreement must be agreed to by both parties in writing. This agreement may be modified to incorporate new sections or language as required to insure compliance with the respective agency's legislative mandates and internal policies and processes. If the Census Bureau cancels the order, CMS is authorized to collect costs incurred prior to cancellation of the order plus any termination cost.

XI. PRIVACY ACT

This agreement is associated with personally identifiable information (PII) subject to the Privacy Act of 1974.

The CMS system(s) of records from which PII will be released is: the Chronic Condition Warehouse, System No. 09-70-0573 and the Enrollment Data Base, System of record notice. 09-70-0502.

There is an underlying agreement with terms and conditions for disclosing PII, DUA 18931.

XII. INFORMATION SECURITY

This agreement is associated with CMS information and access to the following information systems(s) subject to the Federal Information Security Modernization Act of 2014 (FISMA): Chronic Condition Data Warehouse.

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence and to use the data for statistical purposes only in accordance with the provisions of Title 13, United States Code. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with the National Institute of Standards and Technology (NIST) Federal Information Processing Standards (FIPS) 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "Recommended Security Controls for Federal Information Systems and Organizations," as well as Special Publication 800-37r1 "Guide for Applying the Risk Management Framework to Federal

AMERICAN OVERSIGHT

Information Systems: A Security Life Cycle Approach." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the Chief Information Officer (CIO) as well as the Department of Commerce Office of Inspector General as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "Standards for Security Categorization of Federal Information and Information Systems" and NIST Special Publication 800-60r1 "Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices." Security controls and subsequent assessments are done based on the final categorization.

Cloud providers must be approved for at least moderate level information through the General Services Administration (GSA) Federal Risk and Authorization Management Program (FedRAMP) process prior to acquiring any services. Census Bureau identifies, assesses and authorizes use based on the published FedRAMP results and an assessment of any Census Bureau (customer provided) controls implemented to protect the infrastructure and data. Security reporting on cloud providers is reported to the Department of Commerce on a regular basis under Federal Information Security Management Act of 2002 (FISMA).

The Census Bureau maintains a policy regarding the reporting of and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are reported within one hour to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau becomes aware of a known breach of CMS data, the Census Bureau will contact the identified CMS contacts to discuss the actions and potential remedies in regards to the incident.

Census Disclosure Avoidance Review of Statistical Products

Title 13, Section 9 of the United States Code (U.S.C.) requires the Census Bureau to keep confidential the information collected from the public under the authority of Title 13. Section 214 of Title 13, U.S.C., and Sections 3551, 3559 and 3571 of Title 18, U.S.C., provide for the imposition of penalties of up to five years in prison and/or up to $250,000.00 in fines for wrongful disclosure of confidential census information. Disclosure avoidance is the process for protecting the confidentiality of data, as required under Title 13 U.S.C. A disclosure of data occurs when someone can use published statistical information to identify an individual who has provided confidential information. For data tabulations, the Census Bureau uses disclosure avoidance procedures to modify or remove the characteristics that put confidential information at risk for disclosure. Although a published table may appear to show information about a specific individual, the Census Bureau has taken steps to disguise or suppress the

AMERICAN OVERSIGHT

original data, while making sure the results are still useful. The techniques used by the Census Bureau to protect confidentiality in tabulations vary, depending on the type of data.

Noise injection is the Census Bureau's preferred disclosure avoidance technique. By policy, noise injection is to be applied to all data products that are reported with geographies smaller than a state. In cases when it is not feasible to fully implement noise injection within the period of the contract, a transition plan for implementing noise injection or other provable privacy methods must be developed in coordination with the Census Bureau. Noise injection may be required for microdata releases, depending on the characteristics of the microdata and the specific variables that are to be released. Data that cannot be publicly released may still be analyzed within the Federal Statistical Research Data Centers (FSRDCs) by individuals who have Special Sworn Status; the results of such analyses must still go through a disclosure avoidance process prior to being publicly released.

The parties understand that Title 13 confidentiality protection and disclosure avoidance techniques apply to all work described in this agreement. The disclosure avoidance methods are defined by the Census Bureau who has the responsibility of carrying out that work. Accordingly, upon completion of the tabulation, the data produced must be reviewed by the Census Bureau to ensure that no identifiable Title 13 data are or may be disclosed. Should the Census Bureau's Disclosure Review Board (DRB) determine that the requested statistical product does or reasonably could result in such disclosure, then the data product will be modified prior to approval for release to the party(ies) of this agreement. The DRB must approve before a research product can be released to an individual who does not have Special Sworn Status (SSS) and a need to know, or moved to a computer not approved for controlled data according to Census' existing policies and procedures. All data releases will conform to both Census and CMS disclosure requirements as described here and in the DUA.

XIII. SECTION 508

Section 508 of the Rehabilitation Act of 1973 as amended is a federal law that requires Federal agencies (29 U.S.C § 794 (d)) to make Information and Communications Technologies (ICT) accessible to employees and members of the public who have disabilities in a manner comparable to ICT made available to CMS employees and members of the public without disabilities. Complying with these amendments will ensure individuals who have disabilities have the same level of access experienced by employees and members of the public without disabilities. This includes creating documents that are accessible to people using assistive technologies, such as screen readers, magnifiers, and other devices such as hearing aids or Text Telephone (TTY).

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000589

Final Rule
On January 18, 2017, the Access Board published a final rule in the Federal Register (82 FR 5790) (hereafter, "ICT Final Rule"), which revised and updated the standards for Section 508. The revised standards applies to the ICT developed, procured, maintained, or used by Federal agencies (hereafter, "508 Standards"), as well as the guidelines for telecommunications equipment and customer premises equipment covered by Section 255 ("255 Guidelines") and the 21st Century Communications and Video Accessibility Act of 2010 (CVAA) ("CVAA Guidelines").

All electronic materials provided under this agreement must meet all applicable Section 508 requirements to the best extent possible. CMS reserves the right to request proof of accessibility for electronic content provided under this IAA and may conduct Section 508 evaluation to assure compliance and usability standards are met.
>>>

DUA: RSCH-2008-18931

MAIN INFORMATION

DUA Number: RSCH-2008-18931
DUA Customer Type: Researcher
DUA Category : 55 - NON DHHS AGENCIES - CENSUS, DOD, EPA, SSA, VA ...
DUA Status: Submitted-Waiting for Payment Confirmation
Request entered by: Cheryl Sample
Requested Date: 8/27/2019
Expiration Date: 9/1/2020
Requester: Michael Berning
Requester Organization Name: United States Census Bureau
Requester Email Address: michael.a.berning@census.gov
Requester Phone Number: (301) 763-2028

Project Name: STATISTICAL ADMINISTRATIVE RECORDS SYSTEM
Privacy Act Authorization Code: FEDERAL AGENCY RU
HIPAA Authorization Code: Research

ResDAC Information

ResDAC TicketID : EOP-213-47956

ResDAC Executive Advisor(EA)

Name: Jen Reese
Email: ResDAC@umn.edu
Phone Number: (888) 973-7322
Phone Number Ext :

ResDAC Technical Advisor(TA)

Name: Sammy Sayako
Email: ResDAC@umn.edu
Phone Number: (888) 973-7322
Phone Number Ext :

Principal Investigator

Primary Principal Investigator

Name: Michael Berning
Email: michael.a.berning@census.gov
Phone Number: 3017632028
Phone Number Ext :

CMS Contact (COR)

AMERICAN OVERSIGHT

COR PROXY

First Name	Last Name	Organization Name	Email Address	Phone Number

Collaborating Organization

1. United States Census Bureau
2. United States Census Bureau
3. UNIVERSITY OF NEBRASKA
4. UNIVERSITY OF CHICAGO
5. YALE UNIVERSITY
6. RAND CORPORATION

FUNDING

Funding Source: Federal (DHHS/non-DHHS)
Funding Type: Grant
Funding Organization Name: U.S. Census Bureau
Grant Number: *This is not a grant* IA 08-141/IAA 13-276/IAA 15-201/IAA#16-187/IA 18-89
Grant End Date : 11/23/2016

Contact Details

Contact Type	First Name	Last Name	Email	Phone	Phone Ext
Federal Project Officer	Michael	Berning	michael.a.berning@census.gov	(301) 763-2028	

DOCUMENTS

ID	Document	Date and Time
1	05a_AMEND_FED_CAHPS_No_Fee_Cost_Inv_JZX-856-31351.docx	May 18, 2017 05:12:29 PM
2	05_FEDERAL_AMEND_Spec_Wrksht_Cost-Inv_JIM-986-69318.xlsx	Sep 12, 2017 09:18:52 AM
3	04a_FEDERAL_AMEND_No_Fee_Cost_Inv_IZP-532-67235.docx	Nov 15, 2017 01:17:27 PM
4	05a_FED_AMEND_No_Fee_Cost_Inv_MMA-887-54262.docx	Feb 15, 2018 10:14:29 AM
5	05_Fed_Amend_Spec_Wrksht_Cost_Inv_EOP-213-47956.xlsx	Feb 15, 2018 11:59:02 AM
6	02_AMEND_FED_CAHPS_Exec_Summ_JZX-856-31351.docx	May 18, 2017 05:13:00 PM
7	01_AMEND_FED_CAHPS_Reqst_Ltr_JZX-856-31351.pdf	May 18, 2017 05:13:18 PM
8	01_FEDERAL_AMEND_Reqst_Ltr_JIM-986-69318.pdf	Sep 12, 2017 09:19:08 AM
9	01_FEDERAL_AMEND_Reqst_Ltr_IZP-532-67235.pdf	Nov 15, 2017 01:17:04 PM
10	01_FED_AMEND_Reqst_Ltr_MMA-887-54262.pdf	Feb 15, 2018 10:13:43 AM
11	01_Fed_Amend_Req_Letter_EOP-213-47956.pdf	Feb 15, 2018 11:59:25 AM
12	04_AMEND_FED_CAHPS_Sig_Addend_OHara_Moulton_JZX-856-31351.pdf	May 18, 2017 05:15:02 PM
13	04_FEDERAL_AMEND_Sig_Addend_Uwimana_JIM-986-69318.pdf	Sep 12, 2017 09:19:49 AM
14	cms-r-0235a_DUA_addendum_18931_Mike_signed.pdf	Aug 01, 2017 08:08:49 AM
15	04_FEDERAL_AMEND_Sig_Addend_Berning_JIM-986-69318.pdf	Sep 12, 2017 09:19:48 AM

AMERICAN OVERSIGHT

ID	Document	Date and Time
16	03_FEDERAL_AMEND_Sig_Addend_Haas_IZP-532-67235.pdf	Nov 15, 2017 01:17:44 PM
17	04_FED_AMEND_Sig_Addend_Humphries_MMA-887-54262.pdf	Feb 15, 2018 10:14:08 AM
18	04_FED_AMEND_Sig_Addend_Mader_MMA-887-54262.pdf	Feb 15, 2018 10:14:08 AM
19	04_FED_AMEND_Sig_Addend_vanDijk_MMA-887-54262.pdf	Feb 15, 2018 10:14:09 AM
20	04_FED_AMEND_Sig_Addend_Tannenbaum_MMA-887-54262.pdf	Feb 15, 2018 10:14:09 AM
21	02_FEDERAL_AMEND_Collabrtr_Chklst_IZP-532-67235.docx	Nov 15, 2017 01:17:16 PM
22	02c_FED_AMEND_Collab_Chklst_MMA-887-54262.docx	Feb 15, 2018 10:13:25 AM
23	05_AMEND_FED_CAHPS_Spec_Wrksht_JZX-856-31351.xlsx	May 18, 2017 05:13:43 PM
24	05_FEDERAL_AMEND_Spec_Wrksht_Cost-Inv_JIM-986-69318.xlsx	Sep 12, 2017 09:19:27 AM
25	05_Fed_Amend_Spec_Wrksht_Cost_Inv_EOP-213-47956.xlsx	Feb 15, 2018 11:59:45 AM
26	01a_AMEND_FED_CAHPS_Apprvl_MCAHPS_JZX-856-31351.pdf	May 18, 2017 05:14:46 PM
27	00_FEDERAL_AMEND_Reqst_Summ_JIM-986-69318.docx	Sep 12, 2017 09:21:05 AM
28	03_FEDERAL_AMEND_DUA_Update_JIM-986-69318.pdf	Sep 12, 2017 09:20:31 AM
29	03_Fed_Amend_DUA_EOP-213-47956.pdf	Feb 15, 2018 12:00:26 PM
30	00_Fed_EA-TA_Amendment_Summary_EOP-213-47956.docx	Feb 15, 2018 12:00:53 PM

CUSTODIANS/ DESY USERS

ID	User Name	EUA User Id	Organization	Email Address	Phone Number	Address
1	John Eric Humphries		YALE UNIVERSITY	john.humphries@yale.edu	(773) 633-8483	37 Hillhouse Ave, New Haven, Connecticut, 06511, USA
2	Winnie Lillian Van Dijk		UNIVERSITY OF CHICAGO	wlvandijk@uchicago.edu	(773) 680-0581	5200 S. Drexel Ave, Apt 2E, Chicago, Illinois, 60615, USA
3	John Moulton		United States Census Bureau	john.richard.moulton@census.gov	(301) 703-8646	4600 SILVER HILL ROAD, WASHINGTON, District of Columbia, 20746, USA
4	Nick Mader		UNIVERSITY OF CHICAGO	nmader@chapinhall.org	(773) 256-5195	Chapin Hall at University of Chicago, 1212 E. 60th Street, Chicago, Illinois, 60637, USA
5	Daniel Tannenbaum		UNIVERSITY OF NEBRASKA	dtannenbaum@unl.edu	(818) 568-8086	1301 Lincoln Mall, Unit 801, Lincoln, Nebraska, 68508, USA
6	Ann Haas		RAND CORPORATION	ann_haas@rand.org	(412) 683-2300 Ext: 4517	4570 FIFTH AVENUE, SUITE 600, PITTSBURGH, Pennsylvania, 15213, USA
7	Epaphrodite Uwimana		United States Census Bureau	epaphrodite.uwimana@census.gov	(301) 763-6064 Ext: 4517	4600 SILVER HILL ROAD, SUITLAND, Maryland, 20746, USA

AMERICAN OVERSIGHT

DATA FILE DESCRIPTION

ID	Data File Description	From Year	To Year	Quarter(s)	Extraction %	Re-Used From DUA	Access Type	Status	Disposition Reason
1	EDB - ENROLLMENT DATA BASE	2008	2013		Migrated from DADSS - NA.		SHIPPING	Open	
2	EDBUSR - ENROLLMENT DATABASE USERVIEW	2013 2017 2018	2016 2017 2018		Migrated from DADSS - NA. 100% 100%		SHIPPING	Open	
3	MSIS - MEDICAID STATISTICAL INFORMATION SYSTEM	2013	2013		Migrated from DADSS - NA.		SHIPPING	Open	
4	XWALK4 - CCW BENE ID TO HIC CROSSWALK FILE	2009 2017 2018	2016 2017 2018		Migrated from DADSS - NA. 100% 100%		SHIPPING	Open	
5	XWALK7 - CCW BENE ID TO SSN CROSSWALK FILE	2009 2017 2018	2016 2017 2018		Migrated from DADSS - NA. 100% 100%		SHIPPING	Open	
6	FFSCAH - FEE-FOR-SERVICE (FFS) CONSUMER ASSESSMENT OF HEALTHCARE PROVIDERS AND SYSTEMS (CAHPS) SURVEY DATA	2014	2014		100%		SHIPPING	Open	
7	MCAHPS - MEDICARE ADVANTAGE AND PRESCRIPTION DRUG PLAN CAHPS	2014	2014		100%		SHIPPING	Open	

PENDING DATA FILE DESCRIPTION

ID	Data File Description	From Year	To Year	Quarter(s)	Extraction %	Re-Used From DUA	Access Type	Status	Disposition Reason

REQUESTER PROXY

First Name	Last Name	Organization Name	Email Address	Phone Number

DADSS Comments

Comment	Comment Date	User
Updated DUA to include 2010 EDB data per IA 10-135	Tue Apr 20 08:12:16	ROBIN DALTON

AMERICAN OVERSIGHT

Comment	Comment Date	User
	EDT 2010	
Cert. of Destruction rec'd for initial 2009 EDB user view file that was sent to Census, but unreadable, form file in subject matter file in files room	Tue Apr 20 10:23:13 EDT 2010	SHARON KAVANAGH
Added Theresa F. Leslie as a custodian per a letter from Howard Hogan.	Fri May 28 11:23:31 EDT 2010	JACQUIE CODE
Changed requestor to Roderick Little and removed Cotty Smith as a custodian.	Tue Jun 28 14:37:10 EDT 2011	DAMIEN MARSTON
Added Vickie Kee as a custodian and a reciptient.	Thu Jul 28 14:46:01 EDT 2011	DAMIEN MARSTON
The DUA EXPIRATION DATE has been modified per the DataUseAgreement team, per new directive given by CMS Deputy Chief Information Officer (CIO) June 23, 2011.	Fri Sep 23 16:37:53 EDT 2011	SHARON KAVANAGH
added Bene ID to HIC crosswalk and Bene ID to SSN crosswalk for the years 2009-2011	Mon Jun 11 08:10:36 EDT 2012	ROBIN DALTON
Added the 2012 EDB file.	Tue Jun 26 09:32:48 EDT 2012	DAMIEN MARSTON
PER DADSS GTL, BATCH JOB CHANGED THE CMS CONTACT FROM ROBIN DALTON TO SHARON KAVANAGH	Fri Jan 25 02:27:16 EST 2013	SHARON KAVANAGH
Extended DUA per email request from vickie.lynn.kee@census.gov on 04/16/2013.	Wed Apr 17 09:41:40 EDT 2013	
updated DUA to include 2013 year of EDB User view data per Andy Shatto, CMS, approved 9/6/2013. CCW/Buccaneer to process the EDB and build the RAND race file for OMH/Census under IAA 13-276. CCW DATA DETAILS per record specification worksheet: All records on the file excluding records with date of death on or before March 31, 2012. Run report on July 15, 2013. Output the same variables as with previous requests under this DUA. As of 2013 - add Bene ID to the record layout. Provide record layout, PROC content, record count, and data dictionary with files. ALSO Changed DUA requestor from Roderick Little to Thomas Louis, new Census signatory official. Added Hampton Wilson (Project Contact); Trent Alexander (new data custodian); and Michael Berning (Principal Investigator), all from Census Bureau. CMS/OMH is collaborating with Census on this initiative, OMH Contact is Carla Hodge.	Fri Sep 06 14:20:07 EDT 2013	
Extended per email received between Mar 07 - Mar 12, 2014 from vickie.lynn.kee@census.gov	Fri Mar 14 02:00:14 EDT 2014	SHARON KAVANAGH
DUA Amendment to add additional years of data (2014) EDB user view, Bene ID to HIC crosswalk and Bene ID to SSN crosswalk. Detailed overview of extract methodology, data, and years requested. All records on the file excluding records with date of death on or before March 31, 2013. Run report on June 15, 2014. Output the same variables as with previous requests under this DUA. Add Bene ID to the record layout. Provide record layout, PROC contents, record count, and data dictionary with files. Added data description code for EDB user view, file was previously approved.	Wed May 21 09:41:16 EDT 2014	
Added 2013 MSIS - Medicaid Statistical Information System relative to the new Census Bureau IA 14-229. Note: This data description was added from the update received from Thomas Louis dated 4/15/14 and approval from Joseph Brewer dated 4/28/14 (which reflected 2014 EDB User View,	Wed Jul 30 14:11:44 EDT 2014	Karen Foster

AMERICAN OVERSIGHT

Comment	Comment Date	User
2014 Crosswalk Bene ID to HIC, and 2014 Crosswalk Bene ID to SSN) processed by V. Rogers on 5/21/14.		
Extended per email received between Jan 16 - Jan 23, 2015 from J Trent Alexander (CENSUS/CES FED)	Tue Jan 27 02:01:02 EST 2015	SHARON KAVANAGH
updated DUA to include additional year of already approved dataset per Kim Elmo email 10/06/2015. 2015 year of EDB User view data, and crosswalks: BENE ID to HIC and BENE ID to SSN. CCW to process the EDB and build the RAND race file for OMH/Census under IAA 15-201. CCW DATA DETAILS per record specification: All records on the file excluding records with date of death on or before March 31, 2014. Run report on June 15, 2015. Output the same variables as with previous requests under this DUA. Add Bene ID to the record layout. Provide record layout, PROC contents, record count, and data dictionary with files. Please see additional sheet for data specifications (electronic file).	Wed Oct 07 15:20:28 EDT 2015	
CUSTODIANS Joey Morales and Ron Jarmin added per Joey Morales (CENSUS/CARRA FED) 10/8/2015	Thu Oct 08 14:35:25 EDT 2015	
CUSTODIAN Ron Jarmin changed from CUSTODIAN to REQUESTOR. REQUESTOR Thjomas Louis removed per Joey Morales (CENSUS/CARRA FED) 10/8/2015	Thu Oct 08 14:48:42 EDT 2015	
CUSTODIANS Roderick Little and Hampton Wilson removed per Joey Morales (CENSUS/CARRA FED) 10/8/15	Fri Oct 09 10:56:40 EDT 2015	PATTY MANGER
Extended DUA per email; J Trent Alexander (CENSUS/CES FED) ; 11/24/2015.	Tue Nov 24 09:12:25 EST 2015	
updated DUA to include additional year (semi-annual data pull per record spec worksheet) of already approved datasets: 2016 EDB User view data, and crosswalks: BENE ID to HIC and BENE ID to SSN. Data pull paid via IAA #16-187 per Kimberly Elmo. See record specification worksheet associated with CMS Request Tracking 20160518-426C.	Tue May 24 16:52:34 EDT 2016	

AMERICAN OVERSIGHT

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
7500 Security Boulevard
Baltimore, Maryland 21244-1850

Invoice Information - October 17, 2019

Current Version: FY10.0 - 1/2017

Michael Bernal, U.S. Census Bureau

Statistical Administrative Records System

Data File(s) Requested	Years/Quarters	Fee Per Year	# Years	Total
Additional Files:				
EDB User View	2018-2020	$ 3,500	3	$ 10,500
Crosswalks:				
BENE_ID to SSN Crosswalk	2020	$ -	1	$ -
BENE_ID to HIC Crosswalk	2020	$ -	1	$ -
			TOTAL	**$ 10,500**

This fee estimate/invoice is based on our understanding of the proposed data request. Any changes in this request, or clarification resulting in changes, may result in a change in the fee estimate. Additionally, this fee estimate/invoice reflects the current fees of the CCW data files, which may be subject to change

Receipt of this fee estimate does not imply that the data request has been approved. The requestor will receive notification upon approval by the Centers for Medicare & Medicaid Services (CMS). If approval is provided, the requestor will be instructed to submit payment via www.pay.gov. CMS requires all requestors to submit payments via www.pay.gov. Once you are notified of approval of your request by CMS, you can access the CMS Data Payment Form by visiting:

https://www.pay.gov/paygov/forms/formInstance.html?agencyFormId=25851882

Payment Instructions:

Using the total amount from this fee estimate, follow the directions provided on the Pay.gov site to complete your transaction. At the end of your payment transaction, you will receive an Agency Tracking ID number. You will then need to email the following information to FilesforOrder@cms.hhs.gov:

1) Pay.gov Agency Tracking ID number,
2) DUA number, and
3) CMS Tracking number.

You MUST send this email in order to notify CMS that payment has been submitted.

Payments by check must be made out to Centers for Medicare & Medicaid Services. Once payment is sent to CMS Accounting, you will need to forward an email to CMS FilesforOrder@cms.hhs.gov.

This email MUST include the following information:

1) CMS Tracking Number,
2) DUA Number, and
3) Check number, check date, amount, and issuing institution.

Regular Mail	Overnight Mail
Centers for Medicare and Medicaid Services Attn: Division of Accounting Operations P.O. Box 7520 Baltimore, MD 21244	Centers for Medicare and Medicaid Services Attn: Division of Accounting Operations Mailstop C3-11-03 7500 Security Blvd Baltimore, MD 21244

AMERICAN OVERSIGHT

MEDICARE Enrollment Database General File Requirements
2018, 2019, and 2020 MEDICARE Enrollment Database General File Requirements

2018 Universe:	National File MEDB 2018 data All records on the file **excluding** records with date of death on or before **March 31, 2017**
2019 Universe:	National File MEDB 2019 data All records on the file **excluding** records with date of death on or before **March 31, 2018.**
2020 Universe:	National File MEDB 2020 data All records on the file **excluding** records with date of death on or before **March 31, 2019.**
Extracts/pull dates:	**NOTE:** We are requesting data for 2018, 2019, and 2020 MEDB data. **The MEDB 2018 extract pulled on July 17, 2018.** **The MEDB 2019 extract pulled on July 9, 2019.** General Dynamics Information Technology (GDIT) is holding the MEDB 2018 and 2019 extracts pending final signatures on this agreement and CMS approval. **The MEDB 2020 extract should be pulled within 10 working days of July 10, 2020** and delivered to Census by August 1, 2020. The delivery should also include a record layout, SAS PROC Contents file, record count, all variables, and data dictionary as specified in this Attachment II and Attachment III – MEDB File Layout of this Addendum. **The delivery should also include the date the file was pulled.**
Format:	SAS Dataset
Data Variables:	See MEDB File Layout (Attachment III)
Transfer Media:	Encrypted data on CD/DVD
Documentation:	1) PROC Content of Dataset 2) Provide extractions/pull dates for both deliveries 3) Provide record count per Dataset 4) Name and telephone number of a technical advisor 5) Latest Data Dictionary

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000598

Delivery Method: Traceable Delivery/Courier Service (Federal Express, UPS, etc.)

Send Documentation and CDs/DVDs to:

Attention: Michael Berning
Assistant Division Chief
Data Acquisition and Curation
Economic Reimbursable Surveys Division, ERD
U.S. Census Bureau
4600 Silver Hill Road
HQ-5K123
Suitland, MD 20746
(301) 763-2028
Michael.a.berning@census.gov

AMERICAN OVERSIGHT

MEDB File Layout

#	Field Name—PRED	Field Name—CMS	Field Description	Start	Len	Type
1	CLMACNT	BENE_CLM_ACNT_NUM	Beneficiary Claim Account Number* *Forms the Health Insurance Claim (HIC) Number when combined with BENE_IDENT_CD (immediately below)	1	9	Char
2	IDENT	BENE_IDENT_CD	Beneficiary Identification Code* *Forms the Health Insurance Claim (HIC) Number when combined with BENE_CLM_ACNT_NUM (immediately above)	10	2	Char
3	FNAME	BENE_GVN_NM	Beneficiary First Name	12	15	Char
4	MINIT	BENE_MDL_NM	Beneficiary Middle Name	27	1	Char
5	LNAME1	BENE_SRNM_NAME1	Beneficiary Surname & Title (1) (Most current)	28	24	Char
6	LNAME2	BENE_SRNM_NAME2	Beneficiary Surname & Title (2) (Second most current)	52	24	Char
7	DOB	BENE_BIRTH_DT	Beneficiary Birth Date	76	8	Char
8	DOD	BENE_DEATH_DT	Beneficiary Death Date	84	8	Char
9	SEX	BENE_SEX_INDENT_CD	Beneficiary Sex	92	1	Char
10	RACE	BENE_RACE_CD	Beneficiary Race	93	1	Char
11	RPRSNTV	BENE_RPRSNTV_PYE_SW	Beneficiary Representative Payee	94	1	Char
12	ADDRESS1	BENE_MLG_CNTCT_ADR1	Beneficiary Mailing Contact Address (Segment 1)	95	22	Char
13	ADDRESS2	BENE_MLG_CNTCT_ADR2	Beneficiary Mailing Contact Address (Segment 2)	117	22	Char
14	ADDRESS3	BENE_MLG_CNTCT_ADR3	Beneficiary Mailing Contact Address (Segment 3)	139	22	Char
15	ADDRESS4	BENE_MLG_CNTCT_ADR4	Beneficiary Mailing Contact Address (Segment 4)	161	22	Char
16	ADDRESS5	BENE_MLG_CNTCT_ADR5	Beneficiary Mailing Contact Address (Segment 5)	183	22	Char
17	ADDRESS6	BENE_MLG_CNTCT_ADR6	Beneficiary Mailing Contact Address (Segment 6)	205	22	Char
18	MAILZIP9	BENE_MLG_CNTCT_ZIP_CD	Beneficiary Mailing Contact ZIP Code (Current ZIP)	227	9	Char
19	ZIP9OCC6	BENE_MLG_CNTCT_ZIP_CD	Beneficiary Mailing Contact ZIP Code (Last 6 ZIP Codes)	236	54	Char
20	RCTCHG	BENE_RSDNC_CHG_DATE	Beneficiary Residence Change Date (Latest change date)	290	8	Char
21	CHGDATE6	BENE_RSDNC_CHG_DATE	Beneficiary Residence Change Date (Last 6 change dates)	298	48	Char
22	STDCNTY	BENE_RSDNC_SSA_STD_CNTY_CD	SSA Standard County Code (Latest)	346	3	Char
23	STDSTATE	BENE_RSDNC_SSA_STD_STATE_CD	SSA Standard State Codes (Latest)	349	2	Char
24	SSN	BENE_SSN_NUM	Beneficiary Social Security Number	351	9	Char

AMERICAN OVERSIGHT

#	Field Name—PRED	Field Name—CMS	Field Description	Start	Len	Type
			(Latest)			
25	AENTSDAT	BENE_PTA_ENTLMT_STRT_DT	Part A Entitlement Start Date (Earliest)	360	8	Char
26	AENTTDAT	BENE_PTA_ENTLMT_TRMNTN_DT	Part A Entitlement End Date (Latest)	368	8	Char
27	BENTSDAT	BENE_PTB_ENTLMT_STRT_DT	Part B Entitlement Start Date (Earliest)	376	8	Char
28	BENTTDAT	BENE_PTB_ENTLMT_TRMNTN_DT	Part B Entitlement End Date (Latest)	384	8	Char
29	PMTSTAT	BENE_SSA_BNFT_PMT_STUS_CD	SSA Benefit Payment Status Code (Latest)	392	2	Char
30	MDCRSTUS	BENE_MDCR_STUS_CD	Beneficiary Status Code (Latest)	394	2	Char
31	UPDTHSTR	EDB_UPDT_HSTRY_CHG_DT	EDB Update History Change Date (Latest—YYYYMMDD)	396	8	Char
32	PRMRYPYR	BENE_PRMRY_PYR_CD	Beneficiary Primary Payer Code (Latest)	404	1	Char
33	ACRTN_DT	BENE_ACRTN_DT	Accretion Date	405	8	Char
34	LANG_CD	BENE_LANG_PREFNC_CD	Beneficiary Language Code	413	1	Char
35	DEATH_DT	BENE_SRC_DEATH_DT_CD	Beneficiary Source Death Date Code	414	2	Char
36	MDCR_DT	BENE_MDCR_STUS_CD_CHG_DT	Ben. Medicare Status Code Change Date	416	8	Char
37	BENE_ID	BENE_ID	Unique Identifier	424	15	Char

AMERICAN OVERSIGHT

Commerce/Census-8, Statistical Administrative Records System and Commerce/Census-3, Special Censuses, Surveys, and Other Studies

COMMERCE/CENSUS-8

SYSTEM NAME:
Statistical Administrative Records System. (December 13, 2016, 81 FR 76554)

SECURITY CLASSIFICATION:
None.

SYSTEM LOCATIONS:
Bowie Computer Center, Bureau of the Census, 17101 Melford Blvd., Bowie, Maryland 20715; and at a FEDRAMP-approved cloud services facility.

CATEGORIES OF INDIVIDUALS COVERED BY THE SYSTEM:
This system covers the population of the United States and territories. In order to approximate coverage of the population in support of its statistical programs, the Census Bureau will acquire administrative record files from agencies such as the Departments of Agriculture, Education, Health and Human Services, Homeland Security, Housing and Urban Development, Labor, Treasury, Veterans Affairs, the Office of Personnel Management, the Social Security Administration, the Selective Service System, and the U.S. Postal Service. Comparable data may also be sought from state agencies and commercial sources and Web sites.

CATEGORIES OF RECORDS IN THE SYSTEM:
Records in this system of records are organized into three components:

- The first category contains records with personal identifiers (names and Social Security Numbers (SSNs)), with access restricted to a limited number of sworn Census Bureau staff. These records are only used for a brief period of time while the personal identifiers are replaced with unique non-identifying codes. In a controlled Information Technology (IT) environment, the identifying information (SSN) contained in source files is removed and replaced with unique non-identifying codes. The Census Bureau does not collect SSNs in Title 13 surveys or censuses. Title 13, Section 6, authorizes the Census Bureau to acquire information from other federal departments and agencies and for the acquisition of reports of other governmental or private sources. Data acquired by the Census Bureau to meet this directive may include direct identifiers such as name, address, date of birth, driver's license number, and SSN. The direct identifiers are used to identify duplicate lists and link across multiple sources.
- The Census Bureau has developed software to standardize and validate incoming person records to assign a unique Census Bureau linkage identifier. This identifier, called the Protected Identification Key (PIK), is retained on files so that SSNs can be removed. This process occurs through the Person Identification Validation System (PVS). The PVS software processes direct identifiers from input files. Census Bureau staff use the person linkage keys to merge files when conducting approved research and operations activities. The software is also used to facilitate record linkage for Census Bureau research partners within the Federal Statistical System. Through legal

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000602

agreements, linkage keys may be created by the Census Bureau for other Federal Statistical Agencies to produce statistics. The PVS system does not append additional identifying information, only a unique identifier to facilitate record linkage.

- The second category contains records that are maintained on unique data sets that are extracted or combined on an as-needed basis in approved projects. Records are extracted or combined as needed using the unique non-identifying codes, not by name or SSN, to prepare numerous statistical products. These records may contain information such as: Demographic information—date of birth, sex, race, ethnicity, household and family characteristics, education, marital status, tribal affiliation, and veteran's status, etc.; Geographical information—address and geographic codes, etc.; Mortality information—cause of death and hospitalization information; Health information—type of provider, services provided, cost of services, and quality indicators, etc.; Economic information—housing characteristics, income, occupation, employment and unemployment information, health insurance coverage, Federal and State program participation, assets, and wealth.
- The third category contains two types of records that use name data for specific research activities. The Census Bureau has policies and procedures to review and control name data from administrative records providers and third party sources. This category refers to name data used to plan contact operations for surveys and censuses and for research on names. The first type of records includes Respondent contact information—name (or username), address, telephone number (both landline and cell phone number), and email address or equivalent. The second type of records includes name data used to set Demographic Characteristics Flags—names are compared to lookup tables and used in models to assign sex and ethnicity. Records in this category are maintained on unique data sets that are extracted or combined on an as-needed basis using the unique non-identifying codes that replaced the SSNs, but with some name information retained.

AUTHORITY FOR MAINTENANCE OF THE SYSTEM:
Title 13 U.S.C. 6.

PURPOSES:
This system of records supports the Census Bureau's core mission of producing economic and demographic statistics. To accomplish this mission the Census Bureau is directed to acquire information from public and private sources to ensure the efficient and economical conduct of its censuses and surveys by using that information instead of conducting direct inquiries. To provide the information on which the American public, businesses, policymakers, and analysts rely, the Statistical Administrative Records System efficiently re-uses data from external sources, thereby eliminating the need to collect information again. Therefore, the purpose of this system is to centralize and control the use of personally identifiable information by providing a secure repository that supports statistical operations. The system removes SSNs contained in source files and replaces them with unique non-identifying codes called Protected Identification Keys (PIKs) prior to use by other Census Bureau operating units. Census Bureau staff use the PIK to merge files to conduct approved research projects. Through legal agreements documenting permitted uses of the external data, linked files may be created to produce statistics. By combining survey and census data with

AMERICAN OVERSIGHT

administrative record data from other agencies, and data procured from commercial sources, the Census Bureau will improve the quality and usefulness of its statistics and reduce the respondent burden associated with direct data collection efforts. The system will also be used to plan, evaluate, and enhance survey and census operations; improve questionnaire design and selected survey data products; and produce research and statistical products such as estimates of the demographic, social, and economic characteristics of the population.

ROUTINE USES OF RECORDS MAINTAINED IN THE SYSTEM, INCLUDING CATEGORIES OF USERS AND PURPOSES OF SUCH USES:
None. The Statistical Administrative Records System will be used only for statistical purposes. No disclosures which permit the identification of individual respondents, and no determinations affecting individual respondents will be made.

DISCLOSURE TO CONSUMER REPORTING AGENCIES:
None.

POLICIES AND PRACTICES FOR STORING, RETRIEVING, ACCESSING, RETAINING, AND DISPOSING OF RECORDS IN THE SYSTEM:

STORAGE:
Records will be stored in a secure computerized system and on magnetic media; output data will be electronic. Magnetic media will be stored in a secure area within a locked drawer or cabinet. Source data sets containing personal identifiers will be maintained in a secure restricted-access IT environment. Records may also be stored by or at a secure FEDRAMP-approved cloud service provider or facility.

RETRIEVABILITY:
Staff producing statistical products will have access only to data sets from which SSNs have been deleted and replaced by unique non-identifying codes internal to the Census Bureau. Only a limited number of sworn Census Bureau staff, who work within a secure restricted-access environment, will be permitted to retrieve records containing direct identifiers (such as name or SSN).

SAFEGUARDS:
The Census Bureau is committed to respecting respondent privacy and protecting confidentiality. Through the Data Stewardship Program, we have implemented management, operational, and technical controls and practices to ensure high-level data protection to respondents of our censuses and surveys.

- An unauthorized browsing policy protects respondent information from casual or inappropriate use by any person with access to Title 13 protected data.
- All Census Bureau employees, persons with special sworn status, as well as employees of FEDRAMP-approved cloud services who may have incidental access to Title 13 protected data, are subject to the restrictions, penalties, and prohibitions of 13 U.S.C. 9 and 214 as modified by Title 18 U.S.C. 3551, et. seq.; the Privacy Act of

AMERICAN OVERSIGHT

1974 (5 U.S.C. 552a(b)(4); 18 U.S.C. 1905; 26 U.S.C. 7213, 7213A, and 7431; and 42 U.S.C. 1306.

- All Census Bureau employees and persons with special sworn status will be regularly advised of regulations issued pursuant to Title 13 governing the confidentiality of the data, and will be required to complete an annual Data Stewardship Awareness training and those who have access to Federal Tax Information data will be regularly advised of regulations issued pursuant to Title 26 governing the confidentiality of the data, and will be required to complete an annual Title 26 awareness program. The restricted-access IT environment has been established to limit the number of Census Bureau staff with direct access to the personal identifiers in this system to protect the confidentiality of the data and to prevent unauthorized use or access. These safeguards provide a level and scope of security that meet the level and scope of security established by OMB Circular No. A-130, Appendix III, Security of Federal Automated Information Resources.
- All Census Bureau and FEDRAMP-approved computer systems that maintain sensitive information are in compliance with the Federal Information Security Management Act, which includes auditing and controls over access to restricted data.
- The use of unsecured telecommunications to transmit individually identifiable information is prohibited.
- Paper copies that contain sensitive information are stored in secure facilities in a locked drawer or file cabinet behind a closed door.
- Each requested use of the data covered in this SORN will be reviewed by an in-house Project Review Board to ensure that data relating to the project will be used only for authorized purposes. All uses of the data are solely for statistical purposes, which by definition means that uses will not directly affect benefits or enforcement actions for any individual. Only when the Project Review Board has approved a project, will access to information from one or more of the source data sets occur. Data from external sources in approved projects will not be made publicly available.
- Any publications based on the Statistical Administrative Records System will be cleared for release under the direction of the Census Bureau's Disclosure Review Board, which will confirm that all the required disclosure protection procedures have been implemented. No information will be released that identifies any individual.

RETENTION AND DISPOSAL:

Records are to be retained in accordance with General Records Schedule GRS 4.3, and the Census Bureau's records control schedule DAA-0029-2014-0005, Records of the Center for Administrative Records Research and Applications, which are approved by the National Archives and Records Administration (NARA). Records are also retained in accordance with agreements developed with sponsoring agencies or source entities. Federal tax information administrative record data will be retained and disposed of in accordance with Publication 1075, Tax information Security Guidelines for Federal, State, and Local Agencies and Entities. The Census Bureau issues an Annual Safeguard Security Report that includes information on the retention and disposal of federal tax information. Pursuant to IRS regulation, Title 26 U.S.C. 6103(p)(4)(F)(ii), data cannot be transferred to NARA.

SYSTEM MANAGER(S) AND ADDRESS:

AMERICAN OVERSIGHT

Commerce/Census-8, Statistical Administrative Records System and Commerce/Census-3, Special Censuses, Surveys, and Other Studies

Associate Director for Research and Methodology, U.S. Census Bureau, 4600 Silver Hill Road, Washington, DC 20233-8000.

NOTIFICATION PROCEDURE:
None.

RECORD ACCESS PROCEDURES:
None.

CONTESTING RECORD PROCEDURES:
None.

RECORD SOURCE CATEGORIES:
Individuals and addresses covered by selected administrative record systems and Census Bureau censuses and surveys including current demographic and economic surveys, quinquennial Economic Censuses, and decennial Censuses of Population and Housing. Additionally, the Census Bureau will also acquire administrative record files from agencies such as the Departments of Agriculture, Education, Health and Human Services, Homeland Security, Housing and Urban Development, Labor, Treasury, Veterans Affairs, the Office of Personnel Management, the Social Security Administration, the Selective Service System, and the U.S. Postal Service, etc. Comparable data may also be sought from state agencies, commercial sources, and Web sites.

SYSTEM EXEMPTIONS FROM CERTAIN PROVISIONS OF THE ACT:
Pursuant to 5 U.S.C. 552a(k)(4), this system of records is exempted from the notification, access, and contest requirements of the agency procedures (under 5 U.S.C. 552a(c)(3), (d), (e)(1), (e)(4)(G), (H), and (I), and (f)). This exemption is applicable as the data are maintained by the Census Bureau solely as statistical records, as required under Title 13, and are not used in whole or in part in making any determination about an identifiable individual. This exemption is made in accordance with the Department's rules which appear in 15 CFR part 4 Subpart B published in this Federal Register.

AMERICAN OVERSIGHT

Commerce/Census-8, Statistical Administrative Records System and Commerce/Census-3, Special Censuses, Surveys, and Other Studies

COMMERCE/CENSUS-3

SYSTEM NAME:
Special Censuses, Surveys, and Other Studies. (March 27, 2012, 77 FR 18205)

SECURITY CLASSIFICATION:
None.

SYSTEM LOCATIONS:
Bowie Computer Center, U.S. Census Bureau, 17101 Melford Blvd., Bowie, Maryland 20715, and U.S. Census Bureau, National Processing Center, 1201 East 10th Street, Jeffersonville, Indiana 47103; and National Archives and Records Administration, Washington National Records Center, Washington, DC 20409.

CATEGORIES OF INDIVIDUALS COVERED BY THE SYSTEM:
This system covers the population of the United States. Survey respondents typically are individuals aged 15 years old or over. Data collected directly from respondents may be supplemented with data from administrative record files received from other federal, state, or local agencies, or commercial sources. These files are collected and processed under the Statistical Administrative Records system. Administrative record files are from agencies including, the Departments of Agriculture, Education, Health and Human Services, Homeland Security, Housing and Urban Development, Labor, Treasury, Veterans Affairs, and from the Office of Personnel Management, the Social Security Administration, the Selective Service System, and the U.S. Postal Service. Comparable data may also be sought from State agencies and commercial sources. Please see the COMMERCE/CENSUS-8, Statistical Administrative Records System SORN for more information. Additionally, subjects of cognitive interviews (to test understanding of a new survey form, for example) are covered in this system of records.

CATEGORIES OF RECORDS IN THE SYSTEM:
Records in this system of records consist of working statistical files (i.e., those files being analyzed to produce survey results), survey data files (i.e., those files containing answers directly from the respondent), and/or data contact files (i.e., those files used for contacting respondents). Records in this system of records may contain information such as: Respondent contact information—telephone number, email address; Demographic information—date of birth, sex, race, ethnicity, household and family characteristics, mobility status, education, marital status, tribal affiliation, veteran's status, disability status; Geographical information—address and geographic codes; Health information—health problems, type of provider, services provided, cost of services, quality indicators; Economic information—housing and institutional characteristics, income, occupation, employment and unemployment information, health insurance coverage, federal and state program participation, assets and wealth; Activity and event related information—commuting, travel, childcare, recreation, consumer expenditures, community service, drug and alcohol use, and crime victimization; Field Representative (FR) related information—U.S. Census Bureau FR code, which is used only as an administrative control item for each record. Some records in this system of records may be obtained from datasets maintained by the COMMERCE/CENSUS-8, Statistical

AMERICAN OVERSIGHT

Commerce/Census-8, Statistical Administrative Records System and Commerce/Census-3, Special Censuses, Surveys, and Other Studies

Administrative Records System where direct identifiers have been replaced with a unique non-identifying code prior to delivery to this system of records, and, therefore are not on the working statistical files. These categories of records are maintained on unique data sets that are extracted or combined on an as needed basis using the unique non-identifying codes but with the original identifiers removed. These records may contain: Demographic information—date of birth, sex, race, ethnicity, household and family characteristics, education, marital status, Tribal affiliation, and veteran's status; Geographical information—address and geographic codes; Mortality information—cause of death and hospitalization information; Health information—type of provider, services provided, cost of services, and quality indicators; Economic information—housing characteristics, income, occupation, employment and unemployment information, health insurance coverage, Federal program participation, assets, and wealth. Another category of records contains two types of records that are maintained on unique data sets that are extracted or combined on an as-needed basis using the unique non-identifying codes but with some name information retained. One type of records contains: Business information—business name, revenues, number of employees, and industry codes in support of economic statistical products. The other type contains: Respondent contact information—name, address, telephone number, age, and sex in support of survey and census data collection efforts. See the COMMERCE/CENSUS-8, Statistical Administrative Records System SORN for more information. However, for limited short-term projects, some records obtained from datasets maintained by the COMMERCE/CENSUS-8, Statistical Administrative Records System may contain some direct identifiers (such as name, Social Security Number (SSN)) that have been retained in working statistical files for this collection. These short-term projects must present project and use proposal documentation to a team of high level managers, and obtain approval to use direct identifiers in these working statistical files. Additionally, direct identifiers collected from survey respondents are routinely maintained on data contact files in order to facilitate respondent contact or to pre-load data for a data collection instrument.

AUTHORITY FOR MAINTENANCE OF THE SYSTEM:
Title 13 U.S.C. 8(b), 182, and 196 provide the authority for the U.S. Census Bureau to conduct statistical surveys.

PURPOSES:
The purpose of this system of records is to collect statistical information from respondents through survey instruments or other means and to conduct methodological research on improving various aspects of surveys authorized by Title 13, U.S.C. 8(b), 182, and 196, such as: survey sampling frame design; sample selection algorithms; questionnaire development, design, and testing; usability testing of computer software and equipment; post data collection processing; data quality review; and non-response research.

ROUTINE USES OF RECORDS MAINTAINED IN THE SYSTEM, INCLUDING CATEGORIES OF USERS AND PURPOSES OF SUCH USES:
None. The data will be used only for statistical purposes. No disclosures which permit the identification of individual respondents, and no determinations affecting individual respondents are made.

AMERICAN OVERSIGHT

Commerce/Census-8, Statistical Administrative Records System and Commerce/Census-3, Special Censuses, Surveys, and Other Studies

DISCLOSURE TO CONSUMER REPORTING AGENCIES:
None.

POLICIES AND PRACTICES FOR STORING, RETRIEVING, ACCESSING, RETAINING, AND DISPOSING OF RECORDS IN THE SYSTEM:

STORAGE:
Records (including, but not limited to, sound files of survey or cognitive interviews or electronic datasets) will be stored in a secure computerized system and on magnetic media; output data will be electronic files or paper copies. Paper copies or magnetic media will be stored in a secure area within a locked drawer or cabinet. Data sets may be accessed only by authorized personnel. Control lists will be used to limit access to those employees with a need to know; rights will be granted based on job functions.

RETRIEVABILITY:
A limited number of sworn U.S. Census Bureau staff will be permitted to retrieve records containing direct identifiers (such as a name or SSN). Staff producing final statistical products will have access only to data sets from which direct identifiers have been deleted and replaced by unique non-identifying codes internal to the U.S. Census Bureau.

SAFEGUARDS:
The U.S. Census Bureau is committed to respecting respondent privacy and protecting confidentiality. Through the Data Stewardship Program, we have implemented management, operational, and technical controls and practices to ensure high-level data protection to respondents of our census and surveys. (1) An unauthorized browsing policy protects respondent information from casual or inappropriate use by any person with access to Title 13 protected data. (2) All employees permitted to access the system are subject to the restriction, penalties, and prohibitions of 13 U.S.C. 9 and 214, as modified by Title 18 U.S.C. 3551, et seq.; the Privacy Act of 1974 (5 U.S.C. 552a(b)(4)); and when applicable, Title 26 U.S.C. 7213, 7213A, and 7431; as well as any additional restrictions imposed by statutory authority of a sponsor. (3) All U.S. Census Bureau employees and persons with special sworn status will be regularly advised of regulations issued pursuant to Title 13 U.S.C. governing the confidentiality of the data, and will be required to complete an annual Title 13 awareness program; and those who have access to Federal Tax Information data will be regularly advised of regulations issued pursuant to Title 26 U.S.C. governing the confidentiality of the data, and will be required to complete an annual Title 26 awareness program. (4) All computer systems that maintain sensitive information are in compliance with the Federal Information Security Management Act, which includes auditing and controls over access to restricted data. (5) The use of unsecured telecommunications to transmit individually identifiable information is prohibited. (6) Paper copies that contain sensitive information are stored in secure facilities in a locked drawer or file cabinet behind a locked door. (7) Additional data files containing direct identifiers will be maintained solely for the purpose of data collection activities, such as respondent contact and pre-loading an instrument for a continued interview, and will not be transferred to, or maintained on, working statistical files. (8) Any publications based on this system will be cleared for release under the direction of the U.S. Census Bureau's Disclosure Review Board, which will

AMERICAN OVERSIGHT

confirm that all the required disclosure avoidance procedures have been implemented and no information that identifies any individual is released.

RETENTION AND DISPOSAL:
Records are to be retained in accordance with the General Records Schedule and U.S. Census Bureau's records control schedules that are approved by the National Archives and Records Administration. Generally, records are retained for less than 10 years, unless a longer period is necessary for statistical purposes or for permanent archival retention.

SYSTEM MANAGER(S) AND ADDRESS:
Associate Director for Demographic Programs, U.S. Census Bureau, 4600 Silver Hill Road, Washington, DC 20233-8000.

NOTIFICATION PROCEDURE:
None.

RECORD ACCESS PROCEDURES:
None.

CONTESTING RECORD PROCEDURES:
None.

RECORD SOURCE CATEGORIES:
Individuals and populations covered by selected administrative records systems and U.S. Census Bureau surveys and special censuses.

SYSTEM EXEMPTIONS FROM CERTAIN PROVISIONS OF THE ACT:
Pursuant to Title 5 U.S.C. 552a(k)(4), this system of records is exempted from the notification, access, and contest requirements of the agency procedures (under 5 Title U.S.C. 552a(c)(3), (d), (e)(1), (e)(4)(G), (H), and (I), and (f)). This exemption is applicable as the data are maintained by the U.S. Census Bureau and required by Title 13 to be used solely as statistical records and are not used in whole or in part in making any determination about an identifiable individual. This exemption is made in accordance with the Department's rules, which appear in 15 CFR part 4 subpart B, and in accordance with agency rules published in the rules section of this Federal Register.

AMERICAN OVERSIGHT

Agreement Number: 2064-FY20-NFE-0335

MEMORANDUM OF AGREEMENT
BETWEEN

THE UNITED STATES DEPARTMENT OF COMMERCE,
U.S. CENSUS BUREAU

AND

UNITED STATES DEPARTMENT OF HOMELAND SECURITY

REGARDING THE TRANSFER OF IMMIGRATION AND CITIZENSHIP-RELATED DATA

1. PARTIES AND PURPOSE

This Memorandum of Agreement ("MOA" or "Agreement") establishes an agreement between the United States Department of Commerce ("DOC"), through the U.S. Census Bureau ("Census Bureau"), and the U.S. Department of Homeland Security ("DHS") (hereinafter known as "the Parties"), for the transfer of certain citizenship, immigration, and non-immigration benefit-related data that will assist the Census Bureau in determining the number of citizens, non-citizens, and illegal aliens in the United States, pursuant to Executive Order ("EO") 13880 (July 11, 2019) *Collecting Information About Citizenship Status in Connection With the Decennial Census*.

The Census Bureau will use the data for research and operations to improve record linkage methods for surveys and the 2020 decennial census. Research and operations are terms used to describe the statistical work that the Census Bureau conducts as part of collecting data, linking data and producing and publishing estimates. The Census Bureau will use data to provide new estimates of population characteristics related to citizenship for the purpose of executing the mandate set forth in EO 13880. This Agreement is intended to govern the transfer, use, safeguarding, control, and ownership of the data provided by DHS Components to DOC/Census Bureau to support the Census Bureau's analytical and statistical needs as they relate to the mandate set forth in EO 13880.

2. AUTHORITY

In order to comply with EO 13880, *Collecting Information About Citizenship Status in Connection With the Decennial Census,* DHS is entering into this Agreement with the Census Bureau to share certain citizenship, immigration, and non-immigration benefit-related data. The legal authority for the DOC/Census Bureau to enter into this Agreement is 13 U.S.C. § 6,

AMERICAN OVERSIGHT

which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The legal authority for DHS to enter into this Agreement is 6 U.S.C § 112(b)(2). Additionally, 5 U.S.C. § 552a(b)(4) permits DHS to share Privacy Act protected records with the Census Bureau for purposes of planning or carrying out a census or survey or related activity pursuant to the provisions of Title 13 provided a "need to know" the specific information requested is identified. Other authorities that govern and limit the sharing of information between DHS and the Census Bureau include the following:

- 5 U.S.C. § 552a, Privacy Act of 1974, to include relevant system of records notices (SORNs);
- 8 U.S.C. § 1254a and 8 C.F.R. § 244.16;
- E-Government Act of 2002, § 208 Privacy Provision, to include relevant privacy impact assessments (PIAs);
- National Institutes of Standards and Technology (NIST) SP 800-47, Security Guide for Interconnecting Information Technology Systems;
- NIST SP 800-61 - Computer Security Incident Handling Guide;
- NIST Special Publication 800-53, Security and Privacy Controls for Federal Information Systems and Organizations;
- Office of Management and Budget (OMB) Circular A-130 Appendix I, Responsibilities for Protecting and Managing Federal Information Resources;
- DHS Privacy Incident Handling Guidance;
- DHS Handbook for Safeguarding Sensitive Personally Identifiable Information;
- DHS Privacy Policy Guidance Memorandum 2017-01 "DHS Privacy Policy Regarding Collection, Use, Retention, and Dissemination of Personally Identifiable Information";
- DHS policies regarding disclosure of Section 1367, Asylum, and Refugee information;
- Government Performance and Results Act of 1993 (GPRA), Pub. L. No. 103-62;
- GPRA Modernization Act of 2010, Pub. L. No. 111-352;
- OMB Circular A-123, "Management's Responsibility for Enterprise Risk Management and Internal Control, and Appendices to Management's Responsibility for Internal Control" and OMB Memoranda M-16-17, "OMB Circular A-123, "Management's Responsibility for Enterprise Risk Management and Internal Control" (July 15, 2016) (see also OMB Memoranda M-17-26);

AMERICAN OVERSIGHT

- OMB Memoranda M-15-15, "Improving Statistical Activities through Interagency Collaboration" (July 8, 2015);
- OMB Memoranda M-17-12, "Preparing for and Responding to a Breach of Personally Identifiable Information" (Jan. 3, 2017);
- Department of Commerce Privacy Program Plan.[1]

3. GENERAL TERMS AND CONDITIONS

Pursuant to this Agreement, DHS will coordinate the transfer of certain data from DHS Components - U.S. Citizenship and Immigration Services ("USCIS"), U.S. Customs and Border Protection ("CBP"), and U.S. Immigration and Customs Enforcement ("ICE") - to the Census Bureau. USCIS data will be transferred pursuant to Addendum 1. CBP and ICE data will be transferred as established and stated in each Component's addendum once finalized and agreed upon by both Parties at a future date.

The various types of data and other relevant terms described under this Agreement are defined as:

- DHS Source Data – Original, unaltered data transferred by DHS Components under the terms of the specific Component addenda to this Agreement containing identifying information such as name, Alien number, or SSN transferred by DHS.
- Linked Files – Files produced when DHS Source Data are processed through the Census Bureau's Person Identification Validation System ("PVS") to assign a unique identifier (Protected Identification Key – "PIK"); the Linked Files are further separated into two distinct files:
    - Linked Name File – File containing the PIK and names from the Source Data; and
    - Linked Research File – File containing PIK, and when linked on PIK: demographic data, geographic data, mortality data, health data, and economic data. Records are extracted or combined as needed using the unique non-identifying codes, not by name or SSN, to prepare numerous statistical products.
- Derivative Files – Files that merge Linked Name and Linked Research Files to other Linked Name and Linked Research Files for specific research activities. The Census Bureau has policies and procedures to review and control name data from administrative records providers and third-party sources. This category refers to name data used to plan contact operations for surveys and censuses and for research on names. The first type of records includes Respondent contact information—name (or username), address, telephone number (both landline and cell phone number), and

[1] Available at: http://www.osec.doc.gov/opog/privacy/Memorandums/PRIVACY_PROGRAM_PLAN_2017.pdf

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000613

email address or equivalent. The second type of records includes name data used to set Demographic Characteristics Flags—names are compared to lookup tables and used in models to assign sex and ethnicity. Records in this category are maintained on unique data sets that are extracted or combined on an as-needed basis using the unique non-identifying codes that replaced the SSNs, but with some name information retained. DHS Source Data will be used to create the second type of records in order to model citizenship or immigration status for a respondent to the 2020 Census.

- Person Identification Validation System ("PVS") – is the Census Bureau's process to validate a person's identity by comparing records to federal government sources (called reference files) using fields such as Social Security Number (SSN), name, date of birth, sex, and residential address. However, several million U.S. residents have neither an SSN nor an Individual Taxpayer Identification Number ("ITIN"). Thus, the DHS Source Data will assist the Census Bureau in creating the project reference files it will use in PVS for those individuals in the 2020 Census without an SSN or an ITIN.
- Reference File – A linked composite file of federal source data used to validate characteristics from the source data records.

DHS will only transfer that data which are not subject to 8 U.S.C. § 1367 relating to individuals who applied for and/or received T nonimmigrant status (victims of trafficking); U nonimmigrant status (certain victims of criminal activity); or benefits under the Violence Against Women Act. Other data protected by immigration specific confidentiality provisions will only be disclosed if appropriate exceptions provide for such disclosure. Asylum and Refugee related data will be provided to Census pursuant to a DHS Secretarial Waiver, entitled "Disclosure of Asylum Related Information to the Census," signed in conjunction with this MOA.

The specific details of each Component's transfer of information under this Agreement, including the specific data elements, method of transfer, retention, relevant systems of records notices, and other requirements for their specific data sets, shall be outlined in the addenda to this MOA.

The Census Bureau is responsible for ensuring the data security, integrity, and confidentiality of both the DHS Source Data and any Census Bureau files incorporating DHS Source Data with other Census Bureau data containing identification such as name, Alien number, or SSN after the files are transferred to the Census Bureau, and for maintaining safeguards to prevent any unauthorized disclosure of the DHS Source Data and any Census Bureau files incorporating DHS Source Data.

AMERICAN OVERSIGHT

The Census Bureau's use of this data is governed by the Census System of Records Notice ("SORN") entitled COMMERCE/CENSUS–8, Statistical Administrative Records System.[2] The purpose of the Statistical Administrative Records System ("System") is to centralize and control the use of personally identifiable information ("PII") by providing a secure repository that supports statistical operations. The System removes any social security numbers ("SSNs") contained in source files and replaces them with unique non-identifying codes called Protected Identification Keys ("PIKs") prior to use by other Census Bureau operating units. The Census Bureau will create a PIK-like unique identifier for those records that cannot be linked to any Social Security Administration Numident or IRS Individual Taxpayer Identification Number record. Census Bureau employees use the PIKs and PIK-like identifiers to merge files to conduct approved research projects. For this Agreement, the approved research project is the Project to use Administrative Records Data to Support Executive Order 13880 described in Attachment 1.

The System will also be used to plan, evaluate, and enhance survey and census operations; improve questionnaire design and selected survey data products; and produce research and statistical products such as estimates of the demographic, social, and economic characteristics of the population.

Only a limited number of sworn Census Bureau employees have access to the Source Data within a secure restricted-access environment. Non-Census Bureau employees who are granted Special Sworn Status ("SSS") pursuant to 13 U.S.C. § 23(c) ("SSS researchers"), may be permitted access to linked and derivative data within a secure restricted-access environment.

The Census Bureau is committed to respecting privacy and protecting the confidentiality of the data received from DHS. Through the Data Stewardship Program, the Census Bureau has implemented management, operational, and technical controls and practices to ensure appropriate protection of DHS Source Data and any Census Bureau files incorporating DHS Source Data. All Census Bureau employees and SSS researchers will be regularly advised of Title 13 confidentiality requirements and will be required to complete annual Data Stewardship Awareness training.

Consistent with COMMERCE/CENSUS–8, Statistical Administrative Records System, the Census Bureau has no Routine Uses to permit external sharing. All uses of the data are solely for statistical purposes, which by definition means that uses will not directly affect benefits or enforcement actions for any individual.

Public releases of Census Bureau-produced work products related to the data provided by DHS will not contain PII or any other information that permits the identification of any individual record subjects, businesses, organizations, or institutions. In short, no information

[2] Available at: https://www.federalregister.gov/documents/2016/11/03/2016-26517/privacy-act-of-1974-amended-system-of-records

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000615

will be released that identifies any individual. Any publications based on the Statistical Administrative Records System will be cleared for release under the direction of the Census Bureau's Disclosure Review Board, which will confirm that all the required disclosure protection procedures have been implemented. Published results will meet Census Bureau disclosure avoidance guidelines.

The relevant DHS SORNs and datasets provided pursuant to this Agreement are outlined in each Component's addendum to this Agreement.

In addition to the foregoing sections below, general terms and conditions are as follows:

a. To the extent permitted by law, DHS agrees to:

   i. Transfer data to the Census Bureau, as described in each Component's addendum to this Agreement. Data from CBP and ICE will be transferred as established and stated in each Component's addendum once finalized and agreed upon by both Parties at a future date.

   ii. Provide adequate documentation and support of transferred data for the Census Bureau to be able to interpret the data for the uses permitted in this Agreement, which may include a record layout, record count, record length, or data dictionary, as described in each Component's addendum to this Agreement, as appropriate.

   iii. Allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record.

   iv. Provide information and training to the Census Bureau regarding the content and significance of the data provided in each Component's addendum to this Agreement.

b. The Census Bureau agrees to:

   i. Maintain confidentiality of the data as described in section 4.

   ii. Permit access to DHS Source Data only to the sworn Census Bureau employees processing the DHS Source Data through PVS. Permit access to Linked and Derivative files containing DHS Source Data only to the Census Bureau employees and SSS researchers for the project listed in Attachment 1, or those approved in writing by both Parties.

   iii. Notify the DHS project Point of Contact in writing when the transfer of the data is completed successfully or whether transfer cannot be carried out.

   iv. Ensure that the Statistical Administrative Records System will be used only for statistical purposes and ensure that no disclosures which permit the

AMERICAN OVERSIGHT

identification of individual respondents, and no determinations affecting individual respondents are made.

v. In the event that Census discloses DHS information in a manner inconsistent with the provisions above or unauthorized access to DHS information occurs, Census will immediately notify DHS in accordance with Section 7 below.

vi. Under SORN/CENSUS-8, the original DHS Source Data transferred to the Census Bureau are covered under Retention Schedule DAA-0029-2014-0005-0002 and will be destroyed two years after receipt or as the contract specifies. The DHS Source Data will be processed through the Census Bureau's PVS to assign a unique identifier, PIK, and will be split into two versions: a Linked Names File (containing PIK and names from the source records); and a Linked Research File where SSNs, or other unique identifiers, are dropped but date of birth and address data remain. The merge of Linked Name and Linked Research Files to other Linked Name and Linked Research Files create Derivative Files. The Linked Name, Linked Research Files created with DHS Source Data, and any Derivative Files created with those Linked Name and Linked Research Files are covered under Retention Schedule DAA-0029-2014-0005-0003 and are retained for two years or when no longer required for programmatic purposes, whichever is longer.

vii. Ensure data transmission and storage is conducted in accordance with OMB and NIST guidance identified in this Agreement.

viii. Consult with DHS regarding the meaning and significance of data provided by DHS.

4. CONFIDENTIALITY OF DATA

All DHS Source Data and any Census Bureau files incorporating DHS Source Data will be kept confidential in accordance with applicable federal law, regulations, and policies. Only Census Bureau employees and those individuals who have been granted SSS pursuant to 13 U.S.C. § 23(c) who are helping the Census Bureau conduct the statistical work authorized by this Agreement will have access to the data. Access shall be limited to the minimum number of individuals necessary to perform the work described in this Agreement. The Census Bureau represents and warrants further that the Census Bureau shall not disclose, release, reveal, show, sell, rent, lease, loan, use to determine, or otherwise grant access to DHS Source Data or any Census Bureau files incorporating DHS Source Data covered by this Agreement to any unauthorized person or entity. All DHS Source Data and any Census Bureau files incorporating DHS Source Data shall be used solely for the purposes as outlined herein, and not for program or administrative enforcement.

AMERICAN OVERSIGHT

Census Bureau will not disclose any DHS Source Data or any Census Bureau files incorporating DHS Source Data with information that is identifiable to specific individuals to third parties, unless required by law. To the extent disclosure of any documents or records based upon or incorporating information provided to Census Bureau pursuant to this Agreement, including the Agreement itself, is required pursuant to a request under the Freedom of Information Act (FOIA), by Congress, oversight authorities, or to the extent otherwise required by law, Parties agree to coordinate with one another prior to any release of such information. Consistent with this Agreement, each Party agrees to also comply with their respective applicable civil liberties protection policies.

Both Parties acknowledge that the transfer, use, and disclosure of the DHS Source Data, any Census Bureau files incorporating DHS Source Data, and other information provided by the Parties under this MOA may also be subject to other requirements under immigration and other applicable law, including but not limited to:

- Applications for Special Agricultural Workers pursuant to INA § 210(b), 8 U.S.C § 1160(b), and implementing regulations at 8 C.F.R. § 210.2(e);
- Applications for Legalization pursuant to INA § 245A(c), 8 U.S.C. § 1255a(c), and implementing regulations at 8 C.F.R. § 245a.2(t);
- Temporary Protected Status (TPS), INA § 244(c)(6), 8 U.S.C. § 1254a(c)(6), and implementing regulations at 8 C.F.R. §§ 244.16, 1244.16;
- Classified information as described in INA § 219, 8 U.S.C. § 1189, and INA § 504, 8 U.S.C. § 1534;
- Certain information provided by an alien spouse or child in the context of a petition to remove conditions on the alien's lawful permanent resident status. INA § 216(c)(4), 8 U.S.C. § 1186a(c)(4), and implementing regulations at 8 C.F.R. §§ 216.5(e)(3)(viii), 1216.5(e)(3)(viii);
- Confidential information as described in INA § 235(c)(2), 8 U.S.C. § 1225(c)(2);
- Information relating to beneficiaries of T and U nonimmigrant status for victims of severe forms of trafficking in persons or other serious criminal activity and information relating to Violence Against Women Act (VAWA) self-petitioners and battered spouses and children applying for cancellation of removal. 8 U.S.C. § 1367;
- Names and identifying information of trafficking victims and their family members for trafficking victims in federal custody. 22 U.S.C. § 7105(c)(1); 28 C.F.R. § 1100.31(d)(2);
- Maintenance of accuracy and integrity of entry and exit data system. 8 U.S.C. § 1365b(f);

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000618

- Information contained in or pertaining to any application for asylum (including for withholding of removal under INA § 241(b)(3), 8 U.S.C. § 1231(b)(3), or withholding or deferral of removal under the Convention Against Torture), or records pertaining to any credible fear or reasonable fear determinations. 8 C.F.R. §§ 208.1(a)(1), 1208.1(a)(1), 208.6, and 1208.6 and as a matter of policy, information contained in or pertaining to any application for refugee status is included; and
- The terms and conditions set forth in relevant systems of records notices.

13 U.S.C. § 9 requires the Census Bureau to hold information collected from the public in confidence under the authority of Title 13. 13 U.S.C. § 214, and 18 U.S.C. §§ 3551, 3559, 3571, provide for the imposition of penalties of up to five years in prison and/or up to $250,000.00 in fines for wrongful disclosure of confidential census information.

Disclosure avoidance is the process for protecting the confidentiality of data, as required under Title 13 U.S.C. A disclosure of data occurs when someone can use published statistical information to identify an individual who has provided confidential information. For data tabulations, the Census uses disclosure avoidance procedures to modify or remove the characteristics that put confidential information at risk for disclosure. Although a published table may appear to show information about a specific individual, the Census has taken steps to disguise or suppress the original data, while making sure the results are still useful. The techniques used by the Census to protect confidentiality in tabulations vary, depending on the type of data.

Noise injection is the Census' preferred disclosure avoidance technique. By policy, noise injection is to be applied to all data products that are reported with geographies smaller than a state. In cases when it is not feasible to fully implement noise injection within the period of the contract, a transition plan for implementing noise injection or other provable privacy methods must be developed in coordination with the Census. Noise injection may be required for microdata releases, depending on the characteristics of the microdata and the specific variables that are to be released. Data that cannot be publicly released may still be analyzed within the Federal Statistical Research Data Centers (FSRDCs) by individuals who have Special Sworn Status; the results of such analyses must still go through a disclosure avoidance process prior to being publicly released.

The Parties understand that Title 13 confidentiality protection and disclosure avoidance techniques apply to all Census activity described in this Agreement. The disclosure avoidance techniques are defined by the Census Bureau which has the responsibility of carrying out that work. Accordingly, upon completion of the tabulation of the data, the data produced must be reviewed by the Census Bureau to ensure that no identifiable Title 13 data are disclosed. Should the Census Bureau's Disclosure Review Board determine that the requested statistical product does disclose, or reasonably could result in disclosure of PII, then the data product will be modified prior to approval for release. The Disclosure Review Board must provide prior consent to any release of a research product to an individual who

AMERICAN OVERSIGHT

does not have SSS and a need to know, or movement of a research product to a computer not approved for controlled data according to Census' existing policies and procedures.

5. **GENERAL RESPONSIBILITIES OF PARTIES**

A. DATA. The Parties will adhere to the technical standards, business processes, and privacy protection mechanisms required under the Privacy Act, relevant Privacy Impact Assessments, limitations under immigration and other applicable law, and applicable privacy and security policies that are related to the sharing of the relevant data, including data maintained in a Privacy Act System of Records.

B. USE. The information made available in accordance with this Agreement will be accessed only for authorized purposes as stated in this Agreement and each Component's addendum to this agreement. Furthermore, the data exchanged pursuant to this Agreement and each Component's addendum are only intended to be used for statistical purposes. Census shall take all appropriate measures to understand and properly interpret such data, including engaging in good faith discussions with DHS to understand the data definitions and limitations and the intended analysis and its scope.

The Census Bureau agrees to not release DHS Source Data or any Census Bureau files incorporating DHS Source Data to other Commerce components and agrees to only use the DHS Source Data and any Census Bureau files incorporating DHS Source Data for authorized analytical and statistical purposes.

C. FOIA. Any Freedom of Information Act (FOIA) requests for DHS Source Data shared pursuant to this Agreement, or any Census Bureau files incorporating DHS Source Data, including this Agreement, should be sent to DHS's Privacy Office for proper processing, as part of FOIA's normal referral and consultation process, and shall include details of the nature of the FOIA request and identify the requestor, including their contact information.

D. TECHNOLOGY. The Parties are committed, based on the availability of resources, to updating the information technologies employed to implement this MOA and to ensure that their systems remain efficient and compatible as data volumes increase and more advanced technologies become available. The Parties agree to discuss needs, requirements, and priorities at least annually to work toward the common purpose of improved governmental efficiency.

E. SUPPORT. The Parties will assist each other through established liaisons to support inquiries on data and technical problems. The Parties will notify each other in writing on an annual basis regarding updated points of contact for this purpose.

F. PRIVACY. The collection, use, disclosure, and retention of PII shall be limited to that which is necessary for Census purposes as set forth in this MOA. PII shall be protected by administrative, technical, and physical safeguards appropriate to the sensitivity of the information, in conformance with the Privacy Act and the Fair Information Practice

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000620

Principles (FIPPs), as applicable.[3] PII will not be shared, and is being exchanged only for the authorized statistical and mission related purposes noted herein.

G. DATA QUALITY. All information, to include PII shared under this MOA shall, to the extent feasible, be as accurate, complete, and current as necessary for the purposes identified in this MOA. The Census Bureau, upon discovery of data quality errors in the original, unaltered source DHS files will promptly notify DHS so that corrective action may be taken, if and as necessary. Failure to timely notify DHS regarding data quality errors may result in a suspension of the MOA.

H. TRAINING ON DATA HANDLING. The Census Bureau shall ensure that its employees, contractors, and detailees with access to shared data receive appropriate training on the specific use and purpose in sharing this DHS Source Data and any Census Bureau files incorporating DHS Source Data, as well as training on privacy compliance, the handling of PII, the confidentiality of records, the safeguards required to protect the information, criminal and civil sanctions for noncompliance imposed under the Privacy Act and other applicable Federal laws, and civil rights and civil liberties protections pertaining to the data shared.

I. RECORDS STORAGE AND RETENTION. Census shall store all information exchanged in systems that ensure protection of the information.

To the extent permitted by federal law, all original, unaltered DHS Source Data will be retained by the Census Bureau no more than two (2) years after receipt from DHS. Any revisions to the data retention timetable after the execution of this Agreement must be set forth in writing as an amendment to this Agreement. All original, unaltered DHS Source Data will be expunged from Census Bureau systems as set forth herein, so long as such expungement is not inconsistent with federal records retention law. This complies with the Census Bureau's record retention schedule (DAA-0029-2014-0005-0002) that states that the retention period for original files from outside sources be destroyed when 2 years old from Census Bureau receipt or as contract or Agreement specifies.

In order to comply with the Census Bureau's retention schedule (DAA-0029-2014-0005-0003) any Linked Name Files, Linked Research Files, or Derivative Files containing DHS Source Data, will also be destroyed when two years old or when no longer required for programmatic purposes, whichever is longer.

The Census Bureau agrees to notify DHS within 30 days of the completion of research involving the DHS Source Data. Upon such notice or at the end of the above-mentioned

[3] *See, e.g.*, DHS privacy policies regarding the FIPPs: Privacy Policy Guidance Memorandum 2008-01, *The Fair Information Practice Principles: Framework for Privacy Policy at the Department of Homeland Security*, available here: https://www.dhs.gov/publication/privacy-policy-guidance-memorandum-2008-01-fair-information-practice-principles: Privacy Policy Guidance Memorandum 2017-01, *DHS Privacy Policy Regarding Collection, Use, Retention, and Dissemination of Personally Identifiable Information*, available here: https://www.dhs.gov/publication/dhs-privacy-policy-guidance-memorandum-2017-01. *See also* 6 U.S. Code § 142.

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000621

retention date, whichever occurs sooner, the Census Bureau will destroy all original DHS Source Data. When the Census Bureau destroys the DHS Source Data, the Census Bureau agrees to certify the destruction of the files in writing to DHS. The Census Bureau agrees that no original DHS Source Data shall be retained when the aforementioned files are destroyed unless authorization in writing for the retention of such files has been received from the Point of Contact as identified in this MOA. However, a copy of DHS Source Data may be retained as part of a Linked or Derivative File maintained by the Census Bureau.

J. AUDITING. Both Parties will work together to develop review standards to conduct annual self-audits of their compliance with the provisions of this Agreement. This includes Census auditing the functioning of the anonymization process. The results of the self-audits will be provided to the other Party.

K. ONSITE INSPECTION. The Parties agree that DHS reserves the right to make onsite inspections of Census Bureau facilities and systems housing, and, to the extent permitted by law, to monitor and review all records and documents related to the suspected or confirmed use or improper use of DHS Source Data or any Census Bureau files incorporating DHS Source Data shared under this MOA.

6. INFORMATION SECURITY

Census agrees to use recognized security mechanisms such as passwords, encryption, or other reasonable safeguards to prevent unauthorized access to DHS Source Data, any Census Bureau files incorporating DHS Source Data, and other information provided under this MOA. The Parties shall comply with their internal Department and agency security policies as well as any higher level requirements and reconcile any contradictory internal security policies so as to allow for appropriate and secure operations. All data acquired as a result of this MOA will be protected by the Census Bureau at the moderate risk level in accordance with the National Institute of Standards and Technology (NIST) Federal Information Processing Standards (FIPS) 200 and Special Publication 800-60r1. The Census Bureau will also comply with the Federal Information Security Modernization Act 2014 (FISMA, 44 U.S.C. §3551); related Office of Management and Budget (OMB) circulars and memoranda, such as Circular A-130, Management of Federal Information Resources (July 28, 2016, as revised). The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All Census Bureau systems are fully assessed against NIST Special Publication 800-53r4 "Recommended Security Controls for Federal Information Systems and Organizations," as well as Special Publication 800-37r2 "Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the Chief Information Officer, as well as the Department of Commerce Office of Inspector General as part of the oversight responsibilities.

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000622

All information and information systems are categorized in accordance with NIST FIPS 199 "Standards for Security Categorization of Federal Information and Information Systems" and NIST Special Publication 800-60r1 "Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices." Security controls and subsequent assessments are done based on the final categorization.

Cloud service providers must be approved for at least moderate level information through the GSA FedRAMP process prior to the Census Bureau acquiring any services. Census Bureau identifies, assesses, and authorizes use based on the published FedRAMP results and an assessment of any Census Bureau (customer provided) controls implemented to protect the infrastructure and data. Security reporting on cloud providers is reported to the Department of Commerce on a regular basis under FISMA.

7. BREACHES AND/OR UNAUTHORIZED ACTIVITY

In the event of a breach or unauthorized activity affecting data shared under this MOA, Census Bureau will immediately report to and consult with DHS. A breach is defined as: (a) the loss of control, compromise, unauthorized disclosure, unauthorized acquisition, unauthorized access, or any similar occurrence where (1) a person other than an authorized user accesses or attempts to access PII, or (2) an authorized user accesses or attempts to access PII for an other than authorized purpose. The term encompasses both confirmed and suspected incidents involving PII which raise a reasonable risk of harm; and/or any violation of any of the terms of this MOA. Unauthorized activity may encompass access, use, dissemination, storage, or disposal of the data covered by this MOA.

The Census Bureau maintains a policy regarding the reporting of and response to losses of protected data in accordance with Office of Management and Budget Memorandum M-17-12. Known or suspected losses of protected data must be reported within one hour of its discovery to the Bureau of the Census Computer Incident Response Team (BOC CIRT) who will report as required to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau becomes aware of a known breach of data, the Census will contact the identified contacts to discuss the actions and potential remedies in regards to the incident.

Such notice is to be provided to the Point of Contact listed in this MOA within one hour of when the Party first learns of the breach or unauthorized activity. The Census Bureau must report any incident within an hour to the DHS Point of Contact listed in this MOA and report via email to dhsesoc@hq.dhs.gov. To the extent permitted by law, the Census Bureau agrees to cooperate with any DHS investigation or auditing of such breaches and measures taken in response to same. The Parties shall also take other action as required in regard to unauthorized activity or breaches in compliance with applicable laws and regulations, including OMB M-17-12, "Preparing for and Responding to a Breach of Personally Identifiable Information."

AMERICAN OVERSIGHT

8. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This Agreement is effective on the date on which it is signed by both Parties. The Agreement shall terminate three (3) years following the date on which it becomes effective. If, at the end of three (3) years, the Parties wish to continue the relationship, they must execute a modification to extend the agreement or enter into a new agreement.

Notwithstanding all other provisions of this Agreement, the Parties agree that:

a. This Agreement may be amended at any time by written mutual consent of the Parties; and

b. Either Party may terminate this Agreement upon thirty (30) days written notice to the other Party.

The Parties shall designate responsible officials to meet at least annually, or sooner upon the request of either Party, to discuss and review the implementation, modification, periodic validation, or amendment of this MOA and its Addenda. The results of such discussions or reviews shall be exchanged between the Parties with the DHS Officer for Civil Rights and Civil Liberties and the DHS Chief Privacy Officer receiving information on behalf of DHS and the Census Bureau Chief Privacy Officer, Chief Information Officer and Office of General Counsel, receiving information on behalf of the Census Bureau. However, failure of the Parties to comply with this meeting requirement will not result in the termination of the MOA.

Unless otherwise agreed through mutual written consent of the Parties, all provisions regarding the protection of records shall remain in effect as long as the Census Bureau retains possession of any records or data obtained from DHS through this MOA.

9. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this Agreement, or amendments and/or revisions thereto, that cannot be resolved at the operational level, the area(s) of disagreement shall be stated in writing by each Party and presented to the other Party for consideration. If agreement on interpretation is not reached within thirty (30) days, the Parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

10. INTERPRETATION AND SEVERABILITY

Nothing in this MOA is intended to conflict with current law or regulation. If a term of this MOA is inconsistent with such authority, then that term shall be invalid to the extent of the inconsistency, but the remaining terms and conditions of this MOA shall remain in full force and effect.

11. NO PRIVATE RIGHT OR CAUSE OF ACTION

This MOA is an agreement between DHS and DOC/Census Bureau. It does not create or confer any right or benefit, of any kind, either substantive or procedural, that may be

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000624

enforceable by any third party against the Parties, the United States, or the officers, employees, agents, or associated personnel thereof. Nothing in this MOA is intended to restrict the authority of either Party to act as provided by law, statute, or regulation, or to restrict any Party from administering or enforcing any laws within its authority or jurisdiction.

12. FUNDING

This MOA does not obligate funds or create a financial obligation between the Parties. This MOA also does not document nor provide for the exchange of manpower between the Parties nor does it make any commitment of funds or resources. All activities contemplated by this MOA are subject to the availability of appropriated funds and other necessary resources to the Parties.

13. CONTACTS

Specific names and contact information regarding the points of contact identified below shall be exchanged by the Parties at the time of signature of this MOA and shall be updated as necessary to ensure the information is current.

The Parties mutually agree that the following individuals will be designated as points of contact for the agreement on behalf of DHS and the Census Bureau, respectively:

DHS POC:

Deputy Assistant Secretary
Office of Immigration Statistics
Department of Homeland Security
2707 Martin Luther King Ave SE
Washington DC 20528-0445

Census Bureau POC:

Assistant Division Chief
Economic Reimbursable Surveys Division
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233

The Parties mutually agree that the following individual is designated as "Custodian" of the data on behalf of the Census Bureau and will be personally responsible for the observance of all conditions of use and for establishment and maintenance of security arrangements as specified in this Agreement to prevent unauthorized access, use, and dissemination. The parties mutually agree that DHS may disapprove the appointment of a custodian or may require the appointment of a new custodian at any time.

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000625

Custodian:

Assistant Division Chief
Economic Reimbursable Surveys Division
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233

14. APPROVALS

On behalf of the Census Bureau, the undersigned individual hereby attests that he or she is authorized to enter into this Agreement and agrees to all the terms specified herein.

K Vleandroff 12/23/19

(Date)

Chief, Economic Reimbursable Surveys Division
U.S. Census Bureau

On behalf of DHS, the undersigned individual hereby attests that he or she is authorized to enter into this Agreement and agrees to all the terms specified herein.

James W. McCament DEC 18 2019

James W. McCament (Date)
Deputy Under Secretary for the Office of Strategy, Policy, and Plans
Department of Homeland Security

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000626

Attachment 1: Description of Approved Research Project

Project to use Administrative Records Data to Support Executive Order 13880

The Census Bureau plans to use several administrative data sources of citizenship status in a statistical model that will produce a probability of being a U.S. citizen on April 1, 2020 for each person in the 2020 Census. The citizenship probability will be used together with age, race, ethnicity, and location information from the 2020 Census to produce Citizen Voting Age Population (CVAP) statistics. The objective of the project is to determine the number of citizens and non-citizens in the country.

Person records in each administrative and survey data source, including the 2020 Census, will be validated and assigned a unique person identifier, called a Protected Identification Key (PIK). The PIKs will be used to link each person's citizenship information to their 2020 Census record. The citizenship probability for persons in the 2020 Census without PIKs will be estimated based on local area information and the person's demographic characteristics, but not the person's citizenship, which makes the estimate much less accurate than if the person's citizenship information were available. The validation process (called the Person Identification Validation System (PVS)) involves comparing records to federal government sources (called reference files) using fields such as Social Security Number (SSN), name, date of birth, sex, and residential address. Several million U.S. residents have neither an SSN nor an ITIN, however. Thus, even if such a person's information in an administrative or survey source is accurate, it will not be found in the reference files, no PIK will be assigned, and the person's citizenship probability will be estimated without the benefit of information about her/his citizenship status. Just because a person does not have a PIK does not necessarily mean the person does not have an SSN or ITIN, however. Records often contain errors in personally identifiable information (PII), missing information, or variants not seen in the reference files (e.g., a name or address change), leading to a failure to validate. Thus, imposing an assumption that all persons without PIKs are not U.S. citizens would lead to a significant underestimate of the number of citizens.

PII from DHS data will augment the reference files from SSA and IRS. Some of the records in the DHS data are for people without SSNs or ITINs. This should reduce the number of people in the 2020 Census who cannot be assigned PIKs and thus have little citizenship information to inform their modeled probability of being a citizen.

Once citizenship data sources and the 2020 Census person file have been assigned PIKs, the citizenship data will be linked to the 2020 Census person file. A model will be estimated for each person with a PIK, using the most current citizenship status from each available citizenship source for the person, as well as the person's other demographic, household, and location information as explanatory variables. The model will produce a

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000627

citizenship probability for each person, which will then be combined with age, race, ethnicity, and location information from the 2020 Census to produce the Citizen Voting Age Population (CVAP) statistics.

Having more than one source of citizenship information is necessary, because no one source is complete and up-to-date. The SSA Numident contains citizenship status for most of the population. But the information is not always up-to-date for foreign-born persons. Prior to the 1970's people were not required to provide evidence of citizenship status when applying for an SSN. Thus, the citizenship status is blank for many older people in the Numident. Also, naturalized citizens are not required to notify SSA about their naturalization. Thus, a naturalized citizen's SSA record may incorrectly say the person is not a citizen.

Having information about not only whether a person is a U.S. citizen or not at a point in time, but also their country of origin, visa status, and how long they have been in that status, could help predict naturalization at a later date, because naturalization rates vary across countries of origin, visa statuses, and lengths of time in status. This would be useful for estimating the current citizenship status for persons with citizenship information sometime in the past, but who lack current information.

Prior to producing citizenship statistics in the fall/winter of 2020-2021, the Census Bureau will do extensive testing of the citizenship models. Researchers will use past censuses and the American Community Survey (ACS) as person frames (in place of the 2020 Census), together with citizenship information from administrative sources in the same time periods. The testing will require historical data.

The administrative records data will both expand the coverage of persons with citizenship information in the 2020 Census and provide more up-to-date citizenship information for those already covered by other sources, resulting in more accurate statistics about the U.S. citizen population.

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000628

Addendum 1: USCIS Transfer of Data

A. Terms and Procedures for Providing Citizenship and Immigration Data from USCIS

1. Date Range of Records: All available electronic records through December 31, 2019 and then between January 1 and April 1, 2020.

2. Source Data System(s):
   Central Index System
   CLAIMS 3
   CLAIMS 4
   GLOBAL
   ELIS
   RNACS (via eCISCOR)

3. Data Elements

   USCIS will provide data elements (listed in section 5 below) from all approved petitions for Lawful Permanent Status (Form I-485, Application to Register Permanent Residence or Adjust Status) and for approved applications for Naturalization (N-400, Application for Naturalization), excepting data protected by 8 U.S.C. § 1367 and other confidentiality provisions.

   USCIS will use the USCIS SAS Predictive Modeling Environment (SAS PME) to stage and send data to Census Bureau.

   USCIS will not transfer records pertaining to individuals protected by 8 U.S.C. § 1367 (individuals who applied for and/or received T nonimmigrant status (victims of trafficking), or U nonimmigrant status (certain victims of criminal activity), or benefits under the Violence Against Women Act). Other data protected by immigration specific confidentiality provisions will only be disclosed if appropriate exceptions provide for such disclosure. Asylum and Refugee related data will be provided to Census pursuant to a DHS Secretarial Waiver.

4. Applicable Privacy Impact Assessments (PIAs) and System of Records Notice(s):

   SORNs:

   DHS/USCIS-ICE-CBP-001 Alien File, Index, and National File Tracking System of Records, 82 FR 43556 (September 18, 2017);

   DHS/USCIS-007 Benefits Information System 84 FR 54622 (October 10, 2019)

   DHS/USCIS-010 Asylum Information and Pre-Screening System of Records, 80 FR 74781 (November 30, 2015)

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000629

DHS/USCIS–017 - Refugee Case Processing and Security Screening Information System of Records, 81 FR 72075 (October 19, 2016)

PIAs:

DHS/USCIS/PIA-023 eCISCOR – to cover historical RNACS data

DHS/USCIS/PIA-055 SAS Predictive Modeling Environment

DHS/USCIS/PIA-016 Computer Linked Application Information Management System (CLAIMS 3) and Associated Systems

DHS/USCIS/PIA-015 Computer Linked Application Information Management System (CLAIMS 4)

DHS/USCIS/PIA-056 USCIS ELIS and associated updates

DHS/USCIS/PIA-009 Central Index System (CIS) and associated updates

DHS/USCIS/PIA-027 USCIS Asylum Division and associated updates

DHS/USCIS/PIA-068 Refugee Case Processing and Security Vetting

5. Individual Data Elements:

- A-number
- Social Security Number
- Last Name
- First Name
- Middle Name
- Class of admission
- Class of admission by major category
- Principal / Dependent
- Year of birth
- Month of birth
- Day of birth
- Age
- Country of birth
- Country of last residence
- Marital status
- Gender
- Country of nationality
- In care of Address – Street
- In care of Address – City
- In care of Address – State
- In care of Address – Zipcode
- Last Nonimmigrant class of admission
- Last Nonimmigrant year of admission

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000630

- Last Nonimmigrant month of admission
- Last Nonimmigrant day of admission
- Green Card year
- Green Card month
- Green Card day
- Decision Date year
- Decision Date month
- Decision Date day
- U.S. residential address at the time of naturalization application – Street
- U.S. residential address at the time of naturalization application – City
- U.S. residential address at the time of naturalization application – State
- U.S. residential address at the time of naturalization application – Zipcode
- Year of naturalization application
- Month of naturalization application
- Day of naturalization application
- Residential address at the time of naturalization – Street
- Residential address at the time of naturalization – City
- Residential address at the time of naturalization – State
- U.S. residential address at the time of naturalization – Zipcode
- Year of naturalization
- Month of naturalization
- Day of naturalization

B. Administrative Records Requirements for Measuring Citizenship from USCIS

The Census Bureau seeks immigration and citizenship records starting as early as 1973 (when electronic data was first made available in USCIS systems) with delivery by December 31, 2019. A second delivery of data will include records from January 1, 2020 extending through April 1, 2020 will be sent to the Census Bureau no later than July 31, 2020.

Geography:	**National File**
Reference Period:	All records from USCIS available before: December 31, 2019 April 1, 2020
Delivery Dates:	December 31, 2019 July 1, 2020
Data Variables:	See above
Special Instructions:	Please make sure that the data and variable names/codes are consistent from year to year.
Transfer Media:	Secure File Transfer Protocol (SFTP)
Format:	ASCII
Documentation:	1. Please include the latest codebook (digital

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000631

	preferred), record layout, record count, and the name and telephone number of a technical advisor, upon request and as appropriate. 2. Include responses required in special instructions.
Delivery Method:	
Mark Shipment:	**N/A - SFTP**
Mailing Address for Shipments:	Please e-mail at the time of shipment.
Census Bureau Technical Contact Person:	Dave Sheppard Branch Chief, Data Quality Branch Economic Reimbursable Surveys Division US Census Bureau Office 301-763-9291 Room 5K133 david.w.sheppard@census.gov

AMERICAN OVERSIGHT

Addendum 2: CBP Transfer of Data

A. Terms and Procedures for Providing Arrival and Departure Information from CBP

CBP will use the ADIS system to provide CBP responsive records, not otherwise protected from disclosure, to the Census Bureau. Using the ADIS filtering algorithms, CBP will provide the following data elements for (1) In-Country Overstays and (2) non-immigrants lawfully in the United States within the terms of their admission. CBP will **not** provide any records regarding U.S. citizens (naturalized or native-born).

CBP will not transfer records pertaining to individuals protected by 8 U.S.C. § 1367 (individuals who applied for and/or received T nonimmigrant status (victims of trafficking), or U nonimmigrant status (certain victims of criminal activity), or benefits under the Violence Against Women Act). Other data protected by immigration specific confidentiality provisions will only be disclosed if appropriate exceptions provide for such disclosure. Asylum and Refugee related data will be provided to Census pursuant to a DHS Secretarial Waiver.

CBP will facilitate the exchange of ICE SEVIS records within the ADIS data extract for Census, to permit records from SEVIS data pertaining to individuals protected by 8 U.S.C. § 1367 (individuals who applied for and/or received T nonimmigrant status (victims of trafficking), or U nonimmigrant status (certain victims of criminal activity), or benefits under the Violence Against Women Act) to be culled from the data prior to transfer.

1. Date Range of Records: Extract covering January 1, 2013 to December 31, 2018 to align with the 5-year American Community Survey for testing purposes. Extract covering January 1, 2019 to June 30, 2020 to align with 2020 Census respondents.

2. Source Data System: Arrival and Departure Information System (ADIS)

3. Applicable Privacy Impact Assessments (PIAs) and System of Records Notice(s):

   PIA:

   DHS/CBP/PIA – 024 Arrival and Departure Information System

   SORNs:

   DHS/CBP – 021 Arrival and Departure Information System

4. Individual Data Elements, sourced from the ADIS system:

- Full name
- Date of Birth (DOB)
- Destination Address Related Data Fields (Line 1, Line 2, City, State, Zip code if available)

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000633

- Admit Until Date
- Passport/Visa Information
- Gender
- Email address
- Telephone number
- Social Security Number (SSN) (Document Number)
- Citizenship (at time of event as well as naturalization, if any)
- Nationality (Document Country of Issuance)
- Country of citizenship
- Alien Registration Number (A-Number)
- Event Date: Arrival Date (Departure Date)
- Event Date: Arrival Date (Departure Date)
- Event Type: Departure, Arrival
- Class of admission (the following list of admission classes for Arrival Data:)
    - A3, B1, B2, CW1, CW2, E1, E2, E2C, E3, E3D, F1, F2, M1, M2, J1, J2, G5, H1B, H1B1, H1C, H2A, H2B, H2R, H3, H4, K1, K2, K3, K4, L1A, L1B, L2, NATO7, N8, N9, O1, O2, O3, P1, P2, P3, P4, Q1, R1, R2, TN, TD, V1, V2, V3, WB, WT

B. Administrative Records Requirements for Determining Citizenship Status from CBP Data

The Census Bureau seeks immigration and citizenship records starting as early as possible with delivery by December 31, 2019 with a second delivery of data with a vintage of April 1, 2020 will be sent to the Census Bureau as soon as possible but no later than July 31, 2020. We understand and expect that receiving both applications and approvals as of a cut date means that for some people we will have an application only as their approval status is pending as of the cut date.

Geography:	**National File**
Transfer Media:	Secure File Transfer Protocol (SFTP) or appropriately encrypted CD-ROM or DVD-ROM
Format:	ASCII
Documentation:	1. Please include the latest codebook (digital preferred), record layout, record count, and the name and telephone number of a technical advisor, upon request and as appropriate. 2. Include responses required in special instructions.
Delivery Method:	
Mark Shipment:	**CBP – Immigration Files**
Mailing Address for Shipments:	Please e-mail at the time of shipment.

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000634

Census Bureau Technical Contact Person:	**Dave Sheppard** **Branch Chief, Data Quality Branch** **Economic Reimbursable Surveys Division** **US Census Bureau** **Office 301-763-9291 Room 5K133** **david.w.sheppard@census.gov**

AMERICAN OVERSIGHT

Addendum 3: U.S. Immigrations and Customs Enforcement

A. Terms and Procedures for Providing Student Information from ICE

The ICE Office of Student and Exchange Visitor Program (SEVP) authorizes CBP to facilitate the exchange of SEVIS data elements identified in this Addendum.

CBP will facilitate the exchange of ICE SEVIS records within the ADIS data extract for Census, to permit records from SEVIS data pertaining to individuals protected by 8 U.S.C. § 1367 (individuals who applied for and/or received T nonimmigrant status (victims of trafficking), or U nonimmigrant status (certain victims of criminal activity), or benefits under the Violence Against Women Act) to be culled from the data prior to transfer.

In accordance with the E.O. 13880, this information will be provided to the Census for the purpose of determining the number of citizens, non-citizens, and illegal aliens in the country.

The Census is authorized to use ICE data for the research project(s) associated with improving data linkage methods for surveys associated with the 2020 decennial census.

CBP will use the ADIS system to provide ICE responsive records, not otherwise protected from disclosure, to the Census Bureau.

CBP will not transfer records pertaining to individuals protected by 8 U.S.C. § 1367 (individuals who applied for and/or received T nonimmigrant status (victims of trafficking), or U nonimmigrant status (certain victims of criminal activity), or benefits under the Violence Against Women Act). Other data protected by immigration specific confidentiality provisions will only be disclosed if appropriate exceptions provide for such disclosure. Asylum and Refugee related data will be provided to Census pursuant to a DHS Secretarial Waiver.

1. Date Range of Records: Extract covering January 1, 2013 to December 31, 2018 to align with the 5-year American Community Survey for testing purposes. Extract covering January 1, 2019 to June 30, 2020 to align with 2020 Census respondents.

2. Source Data System: Student Exchange Visitor Information System (SEVIS)

3. Applicable Privacy Impact Assessments (PIAs) and System of Records Notice(s):

   PIA:

   DHS/ICE/PIA – 001 Student and Exchange Visitor Information System (SEVIS)

   SORNs:

   DHS/ICE – 001 Student and Exchange Visitor Information System (SEVIS)

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000636

DHS/ALL – 016 Department of Homeland Security Correspondence Records
DHS/ALL – 003 Department of Homeland Security General Training Records

4. Individual Data Elements, sourced from the SEVIS system:
In order to comply with the EO, ICE will provide the following data elements to the Census Bureau:

- Full name
- Date of Birth (DOB)
- Country Code
- SEVIS Active Status Data
- Active Records
- Class of admission for F and M nonimmigrants
- Mailing Address Related Data Fields (Line 1, Line 2, City, State, Zip code if available)
- Physical Address Related Data Fields (Line 1, Line 2, City, State, Zip code if available)
- Gender
- Email Address
- Telephone Number
- Visa Issue Date
- Visa Expiration Date
- Type of Visa
- Student Left Country
- Program Start Date
- Program End Date

C. Administrative Records Requirements for Determining Citizenship Status from ICE Data

The Census Bureau seeks immigration and citizenship records starting as early as possible with delivery by December 31, 2019 with a second delivery of data with a vintage of April 1, 2020 will be sent to the Census Bureau as soon as possible but no later than July 31, 2020. We understand and expect that receiving both applications and approvals as of a cut date means that for some people we will have an application only as their approval status is pending as of the cut date.

Geography:	**National File**
Transfer Media:	Secure File Transfer Protocol (SFTP) or appropriately encrypted CD-ROM or DVD-ROM
Format:	ASCII
Documentation:	3. Please include the latest codebook (digital preferred), record layout, record count, and the name and telephone number of a technical advisor, upon request and as appropriate. 4. Include responses required in special instructions.

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000637

Delivery Method:	
Mark Shipment:	**ICE – Immigration Files**
Mailing Address for Shipments:	Please e-mail at the time of shipment.
Census Bureau Technical Contact Person:	Dave Sheppard Branch Chief, Data Quality Branch Economic Reimbursable Surveys Division US Census Bureau Office 301-763-9291 Room 5K133 david.w.sheppard@census.gov

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000638

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
WOMEN, INFANTS, AND CHILDREN ADMINISTRATIVE DATA
FROM
THE WASHINGTON STATE DEPARTMENT OF HEALTH, OFFICE OF NUTRITION SERVICES

Agreement No. [0094-2016-PAY-008]

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Washington (WA) State Department of Health, Office of Nutrition Services for the acquisition of Women, Infants, and Children (WIC) Administrative Data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the WA State Department of Health to share WIC data and enter into this agreement is Section 17 of the Child Nutrition Act of 1966, 42 U.S.C. § 1786 and implementing regulations at 7 CFR Part 246. WIC regulations at 7 CFR 246.26(d)(1)(ii) limit the disclosure of WIC recipient information to those directly connected with the administration or enforcement of the WIC program. The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the WIC program because Census will provide to the state copies of its tabulations of the data for the state to use in administering its WIC program.

Additional authority for the WA State Department of Health to enter into this agreement is RCW 43.70.040, which provides for the WA State Department of Health to enter into contracts to carry out its purposes.

3. TERMS AND CONDITIONS

Pursuant to this agreement, the WA State Department of Health, Office of Nutrition Services, hereinafter referred to as "the WA State WIC Program", will transfer records to the Census Bureau from the administration of WIC, hereinafter referred to as "WA State WIC data" and as described in Attachment A of this agreement. All data that the WA State WIC Program agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and Special Sworn Status ("SSS") researchers will have access to the data. Any data, records, or other information shared through this research agreement will be

AMERICAN OVERSIGHT

Dept of Health Contract #K22468

protected from unauthorized disclosure and will be used solely for statistical purposes. When the Census Bureau publicly releases information related to this research, it will not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The WA State WIC Program agrees:

   i. To transfer to the Census Bureau via secure FTP (File Transfer Protocol) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of WIC for the years 2004—2021, as described in Attachment A.

   ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, and record length.

   iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the WA State WIC data. Record linkage identifiers will not contain any WA State WIC data or direct identifiers.

   Research projects exploring whether the administrative records represent the same individuals in survey or census households may need access to name data. Access to name data will only be granted through approval by the Census Bureau Data Stewardship Executive Policy Committee. Researchers will not have access to Social Security Numbers.

   iv. To allow the Census Bureau staff and Special Sworn Status (SSS) researchers to use the WA State WIC data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

   i. To the extent provided by law, to grant access to the WA State WIC data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.

   ii. To provide the WA State WIC Program, within six (6) months of the time the data is processed and provided to Census Bureau research staff, selected tabulations of the WA State WIC data linked to the American Community Survey.

   iii. To the extent permitted by law, allow WA State WIC Program the opportunity to review and provide comments of pre-publication copies of

AMERICAN OVERSIGHT

any report or other document containing information derived from the state data pertaining to WIC and resulting from use under this agreement of the state data. If no comments are received from the WA State WIC Program within fourteen (14) days from delivery of pre-publication documents to the WA State WIC Program, the Census Bureau shall send a reminder notice to the WA State WIC Program. If no comments are received within three (3) business days from delivery of the reminder notice, the WA State WIC Program will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this agreement.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the agreement, to prevent unauthorized use.

Processing Sites: Bowie Computer Center
Suitland Federal Center
Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the WA State WIC Program and the Census Bureau, respectively:

WA State WIC Program POC:
Chris Halsell
Operations and Planning Section Manager
Office of Nutrition Services
WA State Department of Health
P.O. Box 47886
Tumwater, WA 98504-7886
(360) 236-3638
chris.halsell@doh.wa.gov

Census Bureau POC:
Dr. Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

AMERICAN OVERSIGHT

Dept of Health Contract #N22168

5. FUNDING

The total amount to be paid by the Census Bureau to the WA State WIC Program via Electronic Funds Transfer (EFT) is $10,000.00. Funding is provided to reimburse the WA State WIC Program for resources needed to set up and complete the data extraction as described in Attachment C. This Agreement is considered to be a firm commitment.

6. ACCOUNTING DATA

State Agency Accounting Data:

Appropriation No.:

CAN:

DUNS No.: **808883128**

EIN: **91-1444603**

Total Amount:

Control Number:

Census Bureau Accounting Data:

Agency Location Code: **13-04-0001**

Project Code: **7030979**

Division Code: **0094**

Object Class Code: **25-30-07-00**

TAS: **013 X 4512 000**

Business Event Type Code (BETC): **DISB**

Funds Expiration: **No Year**

Funds Cancellation Date: **No Year**

Organization Code: **11-09-0094-00-00-00-00**

DUNS No.: **929955383**

EIN: **52-0204537**

Total Amount: **$10,000.00**

Agreement No.: **0094-2016-PAY-008**

AMERICAN OVERSIGHT

7. FINANCIAL POINTS OF CONTACT

State Agency Financial Contact:

Sheridan Gatewood
Budget, Contracts and Grants Fiscal Lead
Office of Nutrition Services
WA State Department of Health
P.O. Box 47886
Tumwater, WA 98504-7886
(360) 236-3772
Sheridan.gatewood@DOH.WA.GOV

Census Bureau Financial Contact:

Darrell Blyden
Chief, Financial Services Center
Finance Division
U.S. Census Bureau
4600 Silver Hill Road
Washington, DC 20233
(301) 763-4390
Darrell.b.blyden@census.gov

8. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date of the last party's signature. The agreement shall terminate six (6) years following the date on which it becomes effective. If, at the end of six (6) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties will review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, **in order to determine whether it should be revised, renewed or canceled.** The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the WA State WIC Program.

Notwithstanding all other provisions of this agreement, the Parties agree that:

a. This agreement may be amended at any time by written mutual consent of both parties.

b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

The WA State WIC data received from the WA State WIC Program will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the WA State WIC Program establishes a different timetable as clarified, when necessary, in Section 3. Terms and Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original the WA State WIC data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

AMERICAN OVERSIGHT

Dept of Health Contract #N 22168

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the WA State WIC data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and the WA State WIC data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

9. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

10.CONFIDENTIALITY

WIC regulations at 7 CFR 246.26(e) protect the confidentiality of the WA State WIC data. The Census Bureau shall protect the individually identifiable WIC information provided under this agreement in accordance with 13 U.S.C. Section 9. Both parties agree that the requirements of Title 13, Section 9, and the terms of this MOU provide sufficient protection to allow the Washington State Department of Health to satisfy its requirements to protect data pursuant to 45 C.F.R., Part 46 and all state laws governing the confidentiality of the data. The Census Bureau assumes an obligation to keep all data received from other federal, state, and tribal agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9.

Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach.*" The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO (Chief

AMERICAN OVERSIGHT

Information Officer), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 *"Standards for Security Categorization of Federal Information and Information Systems"* and NIST Special Publication 800-60r1 *"Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices."* Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team (US CERT). Within two business days of the Census Bureau becoming aware of a known or suspected breach of the WA State WIC data, the Census Bureau will contact the identified the WA State WIC Program contacts to discuss the actions and potential remedies regarding the incident.

11.APPROVALS

RJ 7/27/16

Ron Jarmin (Date)
Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

Brad Hallstead 10/24/16

Michael Maverick (Date)
Director, Contract & Procurement Office
WA Department of Health
(360) 236-3918
Michael.maverick@doh.wa.gov

Dept of Health Contract #N 22108

AMERICAN OVERSIGHT

Attachment A: Data Elements

1. Data Requirements

Data from the administration of WIC for the years 2004—2021 will include, when available:

a. Case unit identifiers,
b. Complete monthly case unit address history (residence, mailing),
c. History of benefit amounts received (monthly),
d. Income reporting requirement (simplified reporting, change reporting, etc.),
e. Gross income (monthly),
f. Net income (monthly),
g. Eligibility and denial information,
h. Identifiers for individuals in case units, and
i. The following information on individuals in a case unit:
    i. Name
    ii. Relationship to primary recipient
    iii. Case unit/main contact phone number
    iv. Race
    v. Hispanic origin/Ethnicity
    vi. Sex
    vii. Date of birth
    viii. Education
    ix. Employment
    x. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)
    xi. History of membership in case unit

RECEIVED
AUG 08 2018
DOH Contracts Office
AMERICAN OVERSIGHT

Attachment B: Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State, Federal and Tribal Administrative Records

The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the WA State WIC data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of the WA State WIC programs in the American Community Survey (ACS), the Current Population Survey (CPS) and the Survey of Income and Program Participation (SIPP). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state, federal and tribal programs (including the WA State WIC data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing WIC participants and likely eligible non-participants of WIC

WIC data linked to ACS data can provide characteristic information for women, infants, and children participating in the WIC program. Additionally, infants and children with a high probability of being eligible for WIC can be estimated using ACS information on family structure, reported income, and public assistance.[1] The estimated eligible infants and children can be matched to the administrative WIC data to determine who is estimated to be eligible but not participating in the program, helping agencies determine unmet need. The project results can help the WA State WIC agencies improve outreach efforts. This research helps the Census Bureau better understand their survey and census data.

1 Eligible pregnant and breastfeeding women cannot be identified in ACS data.

AMERICAN OVERSIGHT

3. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System (PVS) uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the WA State WIC program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in the WA State WIC programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

A. validating and enhancing the Master Address File (MAF);[2]
B. designing and assigning resources to carry out the 2020 Census;[3]
C. unduplicating public, private, and census lists; and
D. imputing missing data.[4]

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

---

2 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.
3 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.
4 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

AMERICAN OVERSIGHT

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

Dept of Health Contract #N 22108

AMERICAN OVERSIGHT

Attachment C: Statement of Work Funding WA State WIC data Data Extraction

Statement of Work

for the

U.S. Census Bureau Funding of the Data Extraction by the

WA STATE WIC PROGRAM for

WIC Administrative Data

Under the referenced MOU [**0094-2016-PAY-008**] through which the Census Bureau is acquiring WIC Administrative Data from the WA State WIC Program, Census Bureau funding reimburses the WA State WIC Program efforts to extract WIC data for the years CY2004-CY2021, by providing funds to complete the following tasks:

Task 1 – Analysis, Design, and Initial File Delivery

Through this task, the WA State WIC Program has agreed to provide WIC recipient data to the US Census Bureau. This data exists in the WA State WIC Program MIS (WIC-CIMS). While there is no charge for the data, a considerable amount of design, programming, and testing work is needed to extract the data elements needed by the Census Bureau and create a series of "flat files" for transmission to the Census Bureau. We will extract WIC case and client details for CY2004 through CY2015, create a series of files, review the files for accuracy, and provide them to the Census Bureau, along with a data dictionary and record layout, or other similar documentation. This task is expected to be completed by October 1, 2016 with delivery of all CY2004 - CY2015 files.

Task 2 – Delivery of 2016 Data

Through this task, the CY2016 data can be provided after CY2016 is complete. This is expected to be completed by June 30, 2017.

Task 3 – Delivery of 2017 Data

Through this task, the CY2017 data can be provided after CY2017 is complete. This is expected to be completed by June 30, 2018.
*This task deadline may be delayed by the WA State WIC Program implementing a new WIC-MIS database during this time period.

AMERICAN OVERSIGHT

Task 4 – Delivery of 2018 Data

Through this task, the CY2018 data can be provided after CY2018 is complete. This is expected to be completed by June 30, 2019.
*This task deadline may be delayed by the WA State WIC Program implementing a new WIC-MIS database during this time period.

Task 5 – Delivery of 2019 Data

Through this task, the CY2019 data can be provided after CY2019 is complete. This is expected to be completed by June 30, 2020.
*This task deadline may be delayed by the WA State WIC Program implementing a new WIC-MIS database during this time period.

Task 6 – Delivery of 2020 Data

Through this task, the CY2020 data can be provided after CY2020 is complete. This is expected to be completed by June 30, 2021.
*This task deadline may be delayed by the WA State WIC Program implementing a new WIC-MIS database during this time period.

Task 7 – Delivery of 2021 Data

Through this task, the CY2021 data can be provided after CY2021 is complete. This is expected to be completed by June 30, 2022.
*This task deadline may be delayed by the WA State WIC Program implementing a new WIC-MIS database during this time period.

AMERICAN OVERSIGHT

RECEIVED

AUG 08 2018

DOH Contracts Office

AMERICAN OVERSIGHT

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE IDAHO DEPARTMENT OF HEALTH AND WELFARE, DIVISION OF WELFARE

Agreement No. 0094-FY17-NFE-0086

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Idaho Department of Health and Welfare, Division of Welfare (IDHW) for the acquisition of Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF) data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the IDHW to share SNAP data and enter into this agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026. The Food and Nutrition Act of 2008 limits the use of SNAP recipient information to those directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the SNAP program because Census will provide to the state copies of its tabulations of the data for the state to use in administering its SNAP program.

The authority for the IDHW to share TANF data and enter into this agreement is the Public Health and Welfare Act, 42 U.S.C. § 613.

3. TERMS AND CONDITIONS

Pursuant to this agreement, the IDHW, hereinafter referred to as "the state program agency" shall transfer records to the Census Bureau from the administration of SNAP and TANF, hereinafter referred to as "the state data" and as described in Attachment A of this agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and Special Sworn Status ("SSS") researchers will have access to the data. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it may not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. The Census Bureau will use the linked data for

AMERICAN OVERSIGHT

research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

   i. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of SNAP and administration of TANF for readily available information between the years 2004—2021, as described in Attachment A.

   ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, record length and data dictionary.

   iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers may not contain any state data or direct identifiers.

   iv. To allow the Census Bureau staff and SSS researchers to use the state data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

   i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.

   ii. To provide the state program agency a table package based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American Community Survey (ACS). A table package shall include estimated rates of program eligibility and access/participation for the state overall and by various demographic, economic, and household characteristics and by county when the data allow. It also will include distributions across the same characteristics both for program participants and for those who are estimated to be eligible but do not participate. The table package will be delivered either within six (6) months from the date that the state administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.

   iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to SNAP and TANF and resulting from use under this agreement of the state data. If no comments are received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are

AMERICAN OVERSIGHT

received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this agreement.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the agreement to prevent unauthorized use.

Processing Sites: Bowie Computer Center
Suitland Federal Center
Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the state program agency and the Census Bureau, respectively:

State program primary agency POC:
Shane Leach
Bureau Chief
Division of Welfare
450 W. State Street, 2nd Floor
Boise, Idaho 83720
LeachS@dhw.idaho.gov

State program secondary agency POC:
Lori Wolff
Division Administrator
Division of Welfare
450 W. State Street, 2nd Floor
Boise, Idaho 83720
WolffL@dhw.idaho.gov

Census Bureau POC: Dr. Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

AMERICAN OVERSIGHT

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement shall terminate six (6) years following the date on which it becomes effective. If, at the end of six (6) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, **in order to determine whether it should be revised, renewed or canceled.** The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Notwithstanding all other provisions of this agreement, the Parties agree that:

a. This agreement may be amended at any time by written mutual consent of both parties.

b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

The original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3. Terms and Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded,

AMERICAN OVERSIGHT

produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

7. CONFIDENTIALITY

Idaho Administrative Procedure Act (IDAPA) 16.05.01. Use and Disclosure of Department Records protect the confidentiality of the state data, as well as:

- Medicaid, 42 U.S.C. § 1396(a)(a)(7), 42 CFR Part 431.300-307;
- Temporary Assistance to Needy Families, 42 U.S.C. § 602 (a)(1)(A)(iv);
- Supplemental Nutrition Assistance Program, 7 U.S.C. § 2020 (e)(8);
- 7 CFR Part 272.1(c);
- Social Security Act, 42 U.S.C. § 1396(a)(a)(7);
- Social Security Administration Disclosure, 20 CFR Part 401;
- Child Support, 42 U.S.C. § 654(26);
- Public Assistance Programs (Public Welfare), 45 CFR Part 205.50; and
- U.S. Department of Labor Employment and Training Administration, 20 CFR Part 603.

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 *"Recommended Security Controls for Federal Information Systems and Organizations,"* as well as Special Publication 800-37r1 *"Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach."* The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the Chief Information Officer ("CIO"), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 *"Standards for Security Categorization of Federal Information and Information Systems"* and NIST Special Publication 800-60r1 *"Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices."* Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team ("US CERT"). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

AMERICAN OVERSIGHT

8. APPROVALS

11/30/2016

Michael Thieme (Date)
Acting Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

12/2/2016

Lori Wolff (Date)
Administrator
Idaho Department of Health and Welfare, Division of Welfare

AMERICAN OVERSIGHT

Attachment A: Data Elements

1. Data Requirements

Readily available monthly data from the administration of SNAP and TANF for the years 2004—2021 will include, when available:

a. Case unit identifiers,
b. Complete monthly case unit address history (residence, mailing),
c. Benefit amounts received (monthly),
d. Income reporting requirement (simplified reporting, change reporting, etc.),
e. Gross income (monthly),
f. Net income (monthly),
g. Eligibility and denial information,
h. Identifiers for individuals in case units, and
i. The following information on individuals in a case unit:
    i. Name
    ii. Social Security Number
    iii. Case unit/main contact phone number
    iv. Relationship to primary recipient
    v. Race
    vi. Hispanic origin/Ethnicity
    vii. Sex
    viii. Date of birth
    ix. Education
    x. Employment
    xi. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)

AMERICAN OVERSIGHT

Attachment B: Description of Approved Research Projects

1. **Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records**

   The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

   This project will focus on evaluating and improving the measurement of state programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

   This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. **Characterizing likely eligible non-participants of SNAP**

   Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. **Improve Census Bureau Record Linkage Methods**

   The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to

AMERICAN OVERSIGHT

each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

A. validating and enhancing the Master Address File (MAF);[1]
B. designing and assigning resources to carry out the 2020 Census;[2]
C. unduplicating public, private, and census lists; and
D. imputing missing data.[3]

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American

---

1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.
2 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.
3 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

AMERICAN OVERSIGHT

population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

AMERICAN OVERSIGHT

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE ILLINOIS DEPARTMENT OF HUMAN SERVICES

Census Agreement No. [2064-FY18-NFE-0137]
Illinois No. [2018-015]

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Illinois Department of Human Services (IDHS) for the acquisition of Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF) and Women's, Infants, and Children (WIC) data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the IDHS to share SNAP data and enter into this agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026. The Food and Nutrition Act of 2008 limits the use of SNAP recipient information to those directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on October 24, 2017, has determined that the Census Bureau is directly connected with the administration of the SNAP program because Census will provide to the state copies of its research tabulations for the state to use in administering its SNAP program.

The authority for the IDHS to share TANF data and enter into this agreement is consistent with Section 1137 of the Social Security Act and Section 205.50 of Title 45, Code of Federal Regulations.

The authority for the IDHS to share WIC data and enter into this agreement is Section 17 of the Child Nutrition Act of 1966, 42 U.S.C. § 1786 and implementing regulations at 7 CFR Part 246. WIC regulations at 7 CFR 246.26(d)(1)(ii) limit the disclosure of WIC recipient information to those directly connected with the administration or enforcement of the WIC program. The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on October 24, 2017, has determined that the Census Bureau is directly connected with the administration of the WIC program because Census will provide to the state copies of its research tabulations for the state to use in administering its WIC program.

3. TERMS AND CONDITIONS

Pursuant to this agreement, the IDHS hereinafter referred to as "the state program agency" shall transfer records to the Census Bureau from the administration of WIC, SNAP

AMERICAN OVERSIGHT

and TANF, hereinafter referred to as "the state data" and as described in Attachment A of this agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and those Special Sworn Status ("SSS") researchers participating in the projects will have access to the data. Access shall be limited to the minimum number of individuals necessary. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it may not be disclosed in individually-identifiable form that permits the identification of any individual respondents, businesses, organizations, or institutions, and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. To the extent provided by law, the Census Bureau will recognize the state program agency as the owner of the original data in the form that it is delivered to the Census Bureau, prior to its integration with confidential Census data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

A. The state program agency agrees:

i. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of SNAP for the years 2017—2023, as described in Attachment A.

ii. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of TANF for the years 2004—2023, as described in Attachment A.

iii. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of WIC for the years 2004—2023, as described in Attachment A.

iv. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including definitions of active participants, a record layout, record count, record length and data dictionary.

v. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers may not contain any state data or direct identifiers.

vi. To allow the Census Bureau staff and SSS researchers to use the state data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

AMERICAN OVERSIGHT

B. The Census Bureau agrees:

i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.

ii. To provide the state program agency with a copy of data tabulations that the Census Bureau will create for Census research purposes. Specifically, the Census Bureau will provide the state program agency with data tabulations based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American Community Survey (ACS). Data tabulations shall include estimated rates of program eligibility and access/participation for the state overall and by various demographic, economic, and household characteristics and by county when the data allow. It also will include distributions across the same characteristics both for program participants and for those who are estimated to be eligible but do not participate. The data tabulations will be delivered either within six (6) months from the date that the state administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.

iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to SNAP, TANF, and WIC and resulting from use under this agreement of the state data. If no comments are received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this agreement.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the agreement to prevent unauthorized use. The parties mutually agree that the following locations are designated for data processing, analysis, and storage within the Census Network:

Processing Sites:
Bowie Computer Center
Suitland Federal Center
Census Bureau Research Data Centers
Census Approved Cloud Services

AMERICAN OVERSIGHT

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency SNAP and TANF POC:

Paul Thelen
Senior Public Service Administrator
Bureau of Performance Management
100 S. Grand Ave East, Springfield, IL 62762
(217) 782-1128
Paul.thelen@illinois.gov

State program agency WIC POC:

Stephanie Bess
Senior Public Service Administrator
Bureau of Family Nutrition
823 East Monroe, Springfield, IL 62701
(217) 524-3353
Stephanie.bess@illinois.gov

Census Bureau POC:

Michael Berning
Assistant Division Chief
Economic Reimbursables Survey Division
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-2028
michael.a.berning@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement shall terminate six (6) years following the date on which it becomes effective. If, at the end of six (6) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, **in order to determine whether it should be revised, renewed or canceled.** The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.
Notwithstanding all other provisions of this agreement, the Parties agree that:

A. This agreement may be amended at any time by written mutual consent of both parties.

B. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

AMERICAN OVERSIGHT

To the extent permitted by federal law, the original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3. Terms and Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

To promote organizational transparency, and in support of data discovery for current and future research projects, the U.S. Census Bureau posts non-sensitive data documentation to public-facing websites. This documentation, such as a record layout or data dictionary, can include file descriptions, variable lists, variable labels and valid values for each variable.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

The Census Bureau will promptly consider and adjudicate, in accordance with Federal law, claims which may arise for damages of any nature arising out of a Census Bureau act under this agreement. Such adjudication will be pursued under the Federal Tort Claims Act, 28 U.S.C. Section 2671 et seq., the Federal Employees Compensation Act, 5 U.S.C. Section 8101 et seq., or such other legal authority as may be pertinent. The U.S. Department of Justice shall determine the appropriate venues for any litigation arising under this agreement.

7. CONFIDENTIALITY

A. IT Security

The confidentiality of the state data is protected by:

- Medicaid, 42 U.S.C. § 1396(a)(a)(7), 42 CFR Part 431.300-307;
- Temporary Assistance to Needy Families, 42 U.S.C. § 602 (a)(1)(A)(iv);

AMERICAN OVERSIGHT

- Supplemental Nutrition Assistance Program, 7 U.S.C. § 2020 (e)(8);
- 7 CFR Part 272.1(c);
- WIC, 7 CFR 246.26(e)
- Social Security Act, 42 U.S.C. § 1396(a)(a)(7);
- Social Security Administration Disclosure, 20 CFR Part 401;
- Child Support, 42 U.S.C. § 654(26);
- Public Assistance Programs (Public Welfare), 45 CFR Part 205.50; and
- U.S. Department of Labor Employment and Training Administration, 20 CFR Part 603.

The Census Bureau will comply with all federal laws applicable to the privacy or security of data received pursuant to this agreement. As a federal agency, the Census Bureau is not subject to state laws, however the Census Bureau will comply with the requirements of applicable state laws to the extent that they do not conflict with the Census Bureau's requirements under federal law.

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, United States Code. The data provided under this Agreement are confidential under 13, U.S.C. § 9. Per the Federal Cybersecurity Enhancement Act of 2015, these data are also protected from cybersecurity risks through screening of the systems that transmit the data. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the Chief Information Officer ("CIO"), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*." Security controls and subsequent assessments are to be completed based on the final categorization.

Cloud providers must be approved for at least moderate level information through the GSA FedRAMP process prior to acquiring any services. Census Bureau identifies, assesses and authorizes use based on the published FedRAMP results and an assessment of any Census Bureau (customer provided) controls implemented to protect the infrastructure and data. Security reporting on cloud providers is reported to the Department of Commerce on a regular basis under FISMA.

AMERICAN OVERSIGHT

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team ("US CERT"). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

B. Disclosure Avoidance Review of Statistical Products

Title 13, Section 9 of the United States Code (U.S.C.) requires the Census Bureau to keep confidential the information collected from the public under the authority of Title 13. Section 214 of Title 13, U.S.C., and Sections 3551, 3559 and 3571 of Title 18, U.S.C., provide for the imposition of penalties of up to five years in prison and/or up to $250,000.00 in fines for wrongful disclosure of confidential census information.

Disclosure avoidance is the process for protecting the confidentiality of data, as required under Title 13 U.S.C. A disclosure of data occurs when someone can use published statistical information to identify an individual who has provided confidential information under a pledge of confidentiality. For data tabulations, the Census Bureau uses disclosure avoidance procedures to modify or remove the characteristics that put confidential information at risk for disclosure. Although a published table may appear to show information about a specific individual, the Census Bureau has taken steps to disguise or suppress the original data, while making sure the results are still useful. The techniques used by the Census Bureau to protect confidentiality in tabulations vary, depending on the type of data.

The parties understand that Title 13 confidentiality protection and disclosure avoidance techniques apply to all work described in this Agreement. The disclosure avoidance disclosure methods are defined by the Census Bureau which has the responsibility of carrying out that work. Accordingly, upon completion of the tabulation, the data produced must be reviewed by the Census Bureau to ensure that no identifiable Title 13 data are or may be disclosed. Should the Census Bureau's Disclosure Review Board (DRB) determine that the requested statistical product does or reasonably could result in such disclosure, then the data product will be modified prior to approval for release to the party(ies) to this Agreement. The DRB must approve before a research product can be released to an individual who does not have SSS and a need to know, or moved to a computer not approved for controlled data according to Census' existing policies and procedures.

AMERICAN OVERSIGHT

8. APPROVALS

3-6-2018

Nick Orsini (Date)
Assistant Director, Economic Programs
the U.S. Census Bureau

James T Dimas by 5-21-2018

James T. Dimas (Date)
Secretary
Illinois Department of Human Services

AMERICAN OVERSIGHT

Attachment A: SNAP and TANF Data Elements

1. Data Requirements from SNAP and TANF:

Monthly data from the administration of SNAP for the years 2017-2023, and monthly data from the administration of TANF for the years 2004—2023 will include, when available:

a. Case unit identifiers,
b. Active Participant definitions,
c. Complete monthly case unit address history (residence, mailing),
d. Monthly Benefits data (any of the available: benefits received date, benefits amount issued/received, and benefit amount redeemed),
e. Income reporting requirement (simplified reporting, change reporting, etc.),
f. Gross income (monthly),
g. Net income (monthly),
h. Eligibility and denial information,
i. Identifiers for individuals in case units, and
j. The following information on individuals in a case unit:
    i. Name
    ii. Social Security Number
    iii. Case unit/main contact phone number
    iv. Relationship to primary recipient
    v. Race
    vi. Hispanic origin/Ethnicity
    vii. Sex
    viii. Date of birth
    ix. Education
    x. Employment
    xi. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)

2. Data Requirements from WIC:

Monthly data from the administration of WIC for the years 2004—2023 will include, when available:

a. Case Unit identifiers,
b. Active Participant definitions,
c. Complete monthly case unit address history (residence, mailing),
d. Monthly Benefits data (any of the available: benefits received date, benefits amount issued/received, and benefit amount redeemed),
e. Income reporting requirement (simplified reporting, change reporting, etc.),
f. Income (monthly),
g. Eligibility and denial information,
h. Identifiers for individuals in case units, and
i. The following information on individuals in a case unit:
    i. Name
    ii. Case unit/main contact phone number
    iii. Relationship to primary recipient
    iv. Recipient or Caretaker phone number
    v. Race
    vi. Hispanic origin/Ethnicity
    vii. Sex
    viii. Date of birth

AMERICAN OVERSIGHT

ix. Education
x. Employment
xi. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)

AMERICAN OVERSIGHT

Attachment B: Description of Approved Research Projects

1. **Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records**

   The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

   This project will focus on evaluating and improving the measurement of state programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

   This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. **Characterizing likely eligible non-participants of SNAP**

   Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. **Characterizing WIC participants and likely eligible non-participants of WIC**

   WIC data linked to ACS data can provide characteristic information for women, infants, and children participating in the WIC program. Additionally, infants and children with a

AMERICAN OVERSIGHT

high probability of being eligible for WIC can be estimated using ACS information on family structure, reported income, and public assistance.[1] The estimated eligible infants and children can be matched to the administrative WIC data to determine who is estimated to be eligible but not participating in the program, helping agencies determine unmet need. The project results can help state agencies improve outreach efforts. This research helps the Census Bureau better understand their survey and census data.

4. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

5. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

A. validating and enhancing the Master Address File (MAF);[2]
B. designing and assigning resources to carry out the 2020 Census;[3]
C. unduplicating public, private, and census lists; and
D. imputing missing data.[4]

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010

---

1 Eligible pregnant and breastfeeding women cannot be identified in ACS data.
2 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.
3 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.
4 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

AMERICAN OVERSIGHT

Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

6. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

AMERICAN OVERSIGHT

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE KENTUCKY DEPARTMENT FOR COMMUNITY BASED SERVICES

Agreement No. 94-2016-PAY-002

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Kentucky Department for Community Based Services (DCBS) for the acquisition of Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF) data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the Kentucky Department for Community Based Services to share SNAP data and enter into this agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026. The Food and Nutrition Act of 2008 limits the use of SNAP recipient information to those directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the SNAP program because Census will provide to the state copies of its tabulations of the data for the state to use in administering its SNAP program.

The authority for the Kentucky Department for Community Based Services to share TANF data and enter into this agreement is the Public Health and Welfare Act, 42 U.S.C. § 613.

Additional authority for the Kentucky Department for Community Based Services to enter into this agreement is KRS194A.060(2). The cabinet shall share pertinent information from within the agency's records on clients, current and former clients, recipients, and patients as may be permitted by federal and state confidentiality statutes and regulations governing release of data with other public, quasi-public, and private agencies involved in providing services to current or former clients or patients subject to confidentiality agreements as permitted by federal and state law if those agencies demonstrate a direct, tangible, and legitimate interest in the records. In all instances, the individual's right to privacy is to be respected.

AMERICAN OVERSIGHT

3. TERMS AND CONDITIONS

Pursuant to this agreement, the Kentucky Department for Community Based Services, hereinafter referred to as "the state program agency" shall transfer records to the Census Bureau from the administration of SNAP and TANF, hereinafter referred to as "the state data" and as described in Attachment A of this agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. Maintaining confidentiality of these data is guaranteed under Title 13 U.S.C, Section 9, and the Privacy Act of 1974. Only Census Bureau staff and Special Sworn Status ("SSS") researchers will have access to the data. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes. When the Census Bureau publicly releases information related to this research, it may not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

   i. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of SNAP and administration of TANF for the years 2014—2020, as described in Attachment A.

   ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, record length and data dictionary.

   iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers may not contain any state data or direct identifiers.

   Research projects exploring whether the administrative records represent the same individuals in survey or census households may need access to name data. Access to name data will only be granted through approval by the Census Bureau Data Stewardship Executive Policy Committee. Researchers may not have access to Social Security Numbers.

   iv. To allow the Census Bureau staff and SSS researchers to use the state data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

AMERICAN OVERSIGHT

b. The Census Bureau agrees:

i. To grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.

ii. To provide the state program agency, within six (6) months of the time the state data is processed and provided to Census Bureau research staff, selected tabulations of the state SNAP and TANF data linked to the American Community Survey. SNAP profile tabulations shall describe the demographic and household characteristics of residents who are likely to be eligible for SNAP, but who do not participate in the program.

iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to SNAP and TANF and resulting from use under this agreement of the state data. If no comments are received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this agreement.

4. CONTACTS

The parties mutually agree that the following named individual is to be designated as custodian of the files on behalf of the Census Bureau and shall be personally responsible for the observance of all conditions of use, and for the establishment and maintenance of security arrangements to prevent unauthorized use, as specified in the agreement. The Census Bureau agrees to notify the state program agency within fifteen (15) days of any changes of custodianship.

Custodian:
J. Trent Alexander
Data Custodian
U.S. Census Bureau
4600 Silver Hill Road, 2K133
Washington DC 20233
(301) 763-9810
j.trent.alexander@census.gov

Processing Sites:
Bowie Computer Center
Suitland Federal Center
Census Bureau Research Data Centers

AMERICAN OVERSIGHT

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency POC:

Todd Trapp
Branch Manager
Division of Family Support
275 E. Main Street
Frankfort, KY 40621
(502) 564-3440
Todd.trapp@ky.gov

Census Bureau POC:

Dr. Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. FUNDING

The total amount to be paid by the Census Bureau to the state program agency via Electronic Funds Transfer (EFT) is $22,776.00. Funding is provided to reimburse the state program agency for resources needed to set up and complete the data extraction as described in Attachment C. This Agreement is considered to be a firm commitment.

6. ACCOUNTING DATA

State Agency Accounting Data:

Agency Location Code: **L3**

Appropriation No.:

CAN:

DUNS No.: **927-049-767**

EIN: **61-0600439**

Total Amount:

Control Number:

AMERICAN OVERSIGHT

Census Bureau Accounting Data:

Agency Location Code: **13-04-0001**

Project Code: **7008001**

Division Code: **0094**

Object Class Code: **25-30-07-00**

TAS: **013-X-4512-000**

Business Event Type Code (BETC): **DISB**

Funds Expiration: **No Year**

Funds Cancellation Date: **No Year**

Organization Code: **11-09-0094-00-00-00-00**

DUNS No.: **929955383**

EIN: **52-0204537**

Total Amount: **$22,776.00**

Agreement No.: **0094-2016-PAY-002**

7. FINANCIAL POINTS OF CONTACT

State Agency Financial Contact:

Kelli Hill
Assistant Director, Accounting
Office of Administrative & Technology Services
275 East Main Street, Mail Stop 4E-A
Frankfort, KY 40601
502-564-8890

Census Bureau Financial Contact:

Darrell Blyden
Chief, Financial Services Center
Finance Division
U.S. Census Bureau
4600 Silver Hill Road
Washington, DC 20233
(301) 763-43980
Darrell.b.blyden@census.gov

8. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement shall terminate five (5) years following the date on which it becomes effective. If, at the end of five (5) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, **in order to determine whether it should be revised, renewed or**

AMERICAN OVERSIGHT

canceled. The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Notwithstanding all other provisions of this agreement, the Parties agree that:

a. This agreement may be amended at any time by written mutual consent of both parties.

b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

The original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3. Terms and Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

9. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

10.CONFIDENTIALITY

KRS194A.060(1) protects the confidentiality of the state data, as well as:

- Medicaid, 42 U.S.C. § 1396(a)(a)(7), 42 CFR Part 431.300-307;
- Temporary Assistance to Needy Families, 42 U.S.C. § 602 (a)(1)(A)(iv);
- Supplemental Nutrition Assistance Program, 7 U.S.C. § 2020 (e)(8);

AMERICAN OVERSIGHT

- 7 CFR Part 272.1(c);
- Social Security Act, 42 U.S.C. § 1396(a)(a)(7);
- Social Security Administration Disclosure, 20 CFR Part 401;
- Child Support, 42 U.S.C. § 654(26);
- Public Assistance Programs (Public Welfare), 45 CFR Part 205.50; and
- U.S. Department of Labor Employment and Training Administration, 20 CFR Part 603.

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the Chief Information Officer ("CIO"), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*." Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team ("US CERT"). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

AMERICAN OVERSIGHT

11.APPROVALS

12/ 3/19/16

Ron Jarmin (Date)
Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

3/21/16

Adria Johnson (Date)
Commissioner
Kentucky Cabinet for Health and Family Services

AMERICAN OVERSIGHT

Attachment A: Data Elements

1. Data Requirements

Data from the administration of SNAP and TANF for the years 2014—2020 will include, when available:

a. Case unit identifiers,
b. Complete monthly case unit address history (residence, mailing),
c. History of benefit amounts received (monthly),
d. Income reporting requirement (simplified reporting, change reporting, etc.),
e. Gross income (monthly),
f. Net income (monthly),
g. Eligibility and denial information,
h. Identifiers for individuals in case units, and
i. The following information on individuals in a case unit:
    i. Name
    ii. Social Security Number
    iii. Relationship to primary recipient
    iv. Race
    v. Hispanic origin/Ethnicity
    vi. Sex
    vii. Date of birth
    viii. Education
    ix. Employment
    x. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)
    xi. History of membership in case unit

AMERICAN OVERSIGHT

Attachment B: Description of Approved Research Projects

1. **Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records**

   The U.S. Census Bureau administers multiple household surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

   This project will focus on evaluating and improving the measurement of state programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

   This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. **Characterizing likely eligible non-participants of SNAP**

   Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. **Improve Census Bureau Record Linkage Methods**

   The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to

AMERICAN OVERSIGHT

each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

A. validating and enhancing the Master Address File (MAF);[1]
B. designing and assigning resources to carry out the 2020 Census;[2]
C. unduplicating public, private, and census lists; and
D. imputing missing data.[3]

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.
2 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.
3 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

AMERICAN OVERSIGHT

Attachment C: Statement of Work Funding SNAP and TANF Data Extraction

Statement of Work

for the

U.S. Census Bureau Funding of the Data Extraction by the Kentucky Department for Community Based Services (DCBS) for Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF) Administrative Data

Under the referenced MOU 94-2016-PAY-002 through which the Census Bureau is acquiring SNAP and TANF Administrative Data from the Kentucky DCBS, Census Bureau funding reimburses DCBS efforts to extract SNAP and TANF monthly data for the years 2014-2020, by providing funds to complete the following tasks:

Task 1 – Analysis, Design, and Initial File Delivery

Through this task, the DCBS has agreed to provide SNAP and TANF recipient data to the US Census Bureau. While there is no charge for the data, a considerable amount of design, programming, and testing work is needed to extract the data elements needed by the Census Bureau and create a series of "flat files" for transmission to them. We will extract SNAP and TANF case and client monthly details for CY2014 through CY2015 create a series of files, review the files for accuracy, and provide them to the Census Bureau. This task is expected to be completed by February 2016 with delivery of all CY2014 through CY2015 files.

Task 2 – Delivery of 2016 Data

Through this task, the 2016 data can be provided after CY2016 is complete. This is expected to be completed by February 2017.

Task 3 – Delivery of 2017 Data

Through this task, the 2017 data can be provided after CY2017 is complete. This is expected to be completed by February 2018.

Task 4 – Delivery of 2018 Data

Through this task, the 2018 data can be provided after CY2017 is complete. This is expected to be completed by February 2019.

AMERICAN OVERSIGHT

Task 5 – Delivery of 2019 Data

Through this task, the 2019 data can be provided after CY2019 is complete. This is expected to be completed by February 2020.

Task 6 – Delivery of 2020 Data

Through this task, the 2020 data can be provided after CY2020 is complete. This is expected to be completed by February 2021.

AMERICAN OVERSIGHT

AMERICAN OVERSIGHT

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
WOMEN, INFANTS, AND CHILDREN ADMINISTRATIVE DATA
FROM
The Department of Health and Human Services, Maine CDC WIC Nutrition Program
Census Agreement # 2064-FY19-NFE-0199

1. PARTIES AND PURPOSE

This Memorandum of Understanding (MOU) establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Department of Health and Human Services, Maine CDC WIC Nutrition Program (State Program Agency) for the acquisition of Women, Infants, and Children (WIC) Administrative Data.

2. AUTHORITY

The authority for the Census Bureau to enter into this Agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.
The authority for the Maine CDC WIC Nutrition Program to share WIC data and enter into this Agreement is Section 17 of the Child Nutrition Act of 1966, 42 U.S.C. § 1786 and implementing regulations at 7 CFR Part 246. WIC regulations at 7 CFR 246.26(d)(1)(ii) limit the disclosure of WIC recipient information to those directly connected with the administration or enforcement of the WIC program. The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on October 24, 2017, has determined that the Census Bureau is directly connected with the administration of the WIC program because Census will provide to the state copies of its research tabulations for the state to use in administering its WIC program.

3. TERMS AND CONDITIONS

Pursuant to this Agreement, the Maine CDC WIC Nutrition Program, will transfer records to the Census Bureau from the administration of WIC, hereinafter referred to as "the state data" and as described in Attachment A of this Agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and those Special Sworn Status (SSS) researchers participating in the projects will have access to the data. Access shall be limited to the minimum number of individuals necessary. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement.
When the Census Bureau publicly releases information related to this research, it will not be disclosed in individually-identifiable form that permits the identification of any individual respondents, businesses, organizations, or institutions, and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. To the extent provided by law, the Census Bureau will recognize the state program agency as the owner of the original data in the form that it is delivered to the Census Bureau, prior to its integration with confidential Census data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

AMERICAN OVERSIGHT

a. The state program agency agrees:

i. To transfer to the Census Bureau via secure FTP (File Transfer Protocol) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of WIC for the years 2012—2022, as described in Attachment A.

ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this Agreement; including active participant definitions, a record layout, record count, and record length.

iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers will not contain any state data or direct identifiers.

iv. To allow the Census Bureau staff and Special Sworn Status researchers to use the state data at the Processing Sites listed in Section 4 of this Agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this Agreement.

b. The Census Bureau agrees:

i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this Agreement and only for the projects listed in Attachment B or those approved in writing by both parties.

ii. To provide the state program agency with a copy of data tabulations that the Census Bureau will create for Census research purposes. Specifically, the Census Bureau will provide the state program agency with data tabulations based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American Community Survey (ACS). Data tabulations shall include estimated rates of program eligibility and access/participation for the state overall and by various demographic, economic, and household characteristics and by county when the data allow. It also will include distributions across the same characteristics both for program participants and for those who are estimated to be eligible but do not participate. The data tabulations will be delivered either within six months from the date that the state administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.

iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to WIC and resulting from use under this Agreement of the state data. If no comments are received from the state program agency within fourteen days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three business days from delivery of the reminder notice, the state program agency will be deemed to have no comment regarding the

AMERICAN OVERSIGHT

delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this Agreement.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this Agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the Agreement to prevent unauthorized use. The parties mutually agree that the following locations are designated for data processing, analysis, and storage within the Census Network:

Sites: Bowie Computer Center or Other Approved Census Computer Centers
Suitland Federal Center
Federal Statistical Research Data Centers
Census Approved Cloud Services

The parties mutually agree that the following named individuals will be designated as points of contact for the Agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency POC:

Ginger Roberts-Scott
Director Maine CDC WIC Nutrition Program
286 Water Street
Augusta, Maine 04333-0011
207-287-5342
Ginger.roberts-scott@maine.gov

Census Bureau POC:

Michael Berning
Assistant Division Chief
Data Acquisition and Curation
Economic Reimbursable Surveys Division
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-2028
michael.a.berning@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This Agreement is effective on the date on which it is signed by both parties. The Agreement will terminate six years following the date on which it becomes effective. If, at the end of six years, the parties wish to continue the relationship, they must execute a new agreement.

The parties will review this Agreement at least once every three years, or whenever a Federal statute is enacted that materially affects the substance of the Agreement, **in order to determine whether it should be revised, renewed or canceled.** The review will be conducted by the Census Bureau's Assistant Director for Economic Programs and the state program agency.

Notwithstanding all other provisions of this Agreement, the Parties agree that:

a. This Agreement may be amended at any time by written mutual consent of both parties.

AMERICAN OVERSIGHT

b. Either party may terminate this Agreement upon thirty days' written notice to the other party.

To the extent permitted by federal law, the original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3, Terms and Conditions. Any revisions to the data retention timetable after the execution of this Agreement will be stated in writing in an amendment to this Agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this Agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this Agreement.

To promote organizational transparency, and in support of data discovery for current and future research projects, the U.S. Census Bureau posts non-sensitive data documentation to public-facing websites. This documentation, such as a record layout or data dictionary, can include file descriptions, variable lists, variable labels and valid values for each variable.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this Agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this Agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this Agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

The Census Bureau will promptly consider and adjudicate, in accordance with Federal law, claims which may arise for damages of any nature arising out of a Census Bureau act under this Agreement. Such adjudication will be pursued under the Federal Tort Claims Act, 28 U.S.C. Section 2671 et seq., the Federal Employees Compensation Act, 5 U.S.C. Section 8101 et seq., or such other legal authority as may be pertinent. The U.S. Department of Justice shall determine the appropriate venues for any litigation arising under this Agreement.

7. CONFIDENTIALITY

A. IT Security

State Statute 22 M.R.S. § 3762(3)(A) protects the confidentiality of the state data, as well as WIC regulations at 7 CFR 246.26(e). The Census Bureau will comply with all federal laws applicable to the privacy or security of data received pursuant to this Agreement. As a federal agency, the Census Bureau is not

AMERICAN OVERSIGHT

subject to state laws, however the Census Bureau will comply with the requirements of applicable state laws to the extent that they do not conflict with the Census Bureau's requirements under federal law.

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, United States Code. The data provided under this Agreement are confidential under 13, U.S.C. § 9. Per the Federal Cybersecurity Enhancement Act of 2015, these data are also protected from cybersecurity risks through screening of the systems that transmit the data. Upon receipt, all data acquired as a result of this Agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO (Chief Information Officer), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*." Security controls and subsequent assessments are to be completed based on the final categorization.

Cloud providers must be approved for at least moderate level information through the GSA FedRAMP process prior to acquiring any services. Census Bureau identifies, assesses and authorizes use based on the published FedRAMP results and an assessment of any Census Bureau (customer provided) controls implemented to protect the infrastructure and data. Security reporting on cloud providers is reported to the Department of Commerce on a regular basis under FISMA.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum M-17-12. Known or suspected losses of protected data are to be reported within one (1) hour of its discovery to the Bureau of the Census Computer Incident Response Team (BOC CIRT) who will report as required to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau becomes aware of a known breach of the State Data, the Census Bureau will contact the state program agency contacts to discuss the actions and potential remedies regarding the incident.

B. Disclosure Avoidance Review of Statistical Products

Title 13, Section 9 of the United States Code (U.S.C.) requires the Census Bureau to keep confidential the information collected from the public under the authority of Title 13. Section 214 of Title 13, U.S.C., and Sections 3551, 3559 and 3571 of Title 18, U.S.C., provide for the imposition of penalties of

AMERICAN OVERSIGHT

up to five years in prison and/or up to $250,000.00 in fines for wrongful disclosure of confidential census information.

Disclosure avoidance is the process for protecting the confidentiality of data, as required under Title 13 U.S.C. A disclosure of data occurs when someone can use published statistical information to identify an individual who has provided confidential information under a pledge of confidentiality. For data tabulations, the Census Bureau uses disclosure avoidance procedures to modify or remove the characteristics that put confidential information at risk for disclosure. Although a published table may appear to show information about a specific individual, the Census Bureau has taken steps to disguise or suppress the original data, while making sure the results are still useful. The techniques used by the Census Bureau to protect confidentiality in tabulations vary, depending on the type of data.

Noise infusion is the Census Bureau's preferred disclosure avoidance technique. By policy, noise infusion is applied to all data products that are reported with geographies smaller than a state. Noise infusion may be required for microdata releases, depending on the characteristics of the microdata and the specific variables that are to be released. Data that cannot be publicly released may still be analyzed within the Federal Statistical Research Data Centers (FSRDCs) by individuals who have Special Sworn Status; the results of such analyses must still go through a disclosure avoidance process prior to being publicly released.

The parties understand that Title 13 confidentiality protection and disclosure avoidance techniques apply to all work described in this Agreement. The disclosure avoidance disclosure methods are defined by the Census Bureau which has the responsibility of carrying out that work. Accordingly, upon completion of the tabulation, the data produced must be reviewed by the Census Bureau to ensure that no identifiable Title 13 data are or may be disclosed. Should the Census Bureau's Disclosure Review Board (DRB) determine that the requested statistical product does or reasonably could result in such disclosure, then the data product will be modified prior to approval for release to the party(ies) to this Agreement. The DRB must approve before a research product can be released to an individual who does not have SSS and a need to know, or moved to a computer not approved for controlled data according to Census' existing policies and procedures.

AMERICAN OVERSIGHT

8. APPROVALS

11/19/18

Kevin Deardorff (Date)
Chief, Economic Reimbursable Surveys Division
U.S. Census Bureau

10/9/18

Bethany Hamm (Date)
Acting Commissioner
Department of Health and Human Services

AMERICAN OVERSIGHT

Attachment A: Data Elements

1. Data Requirements

Monthly data from the administration of WIC for the years 2012—2022 will include, when available:

a. Case unit identifiers,
b. Active Participant definitions,
c. Complete monthly case unit address history (residence, mailing),
d. Monthly Benefits data (any of the available: benefits received date, benefits amount issued/received, and benefit amount redeemed),
e. Income reporting requirement (simplified reporting, change reporting, etc.),
f. Income (monthly),
g. Eligibility and denial information,
h. Identifiers for individuals in case units, and
i. The following information on individuals in a case unit:
    i. Name
    ii. Case unit/main contact phone number
    iii. Relationship to primary recipient
    iv. Recipient or Caretaker phone number
    v. Race
    vi. Hispanic origin/Ethnicity
    vii. Sex
    viii. Date of birth
    ix. Gross income (monthly)
    x. Net Income (monthly)
    xi. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)
    xii. Education
    xiii. Employment

AMERICAN OVERSIGHT

Attachment B: Description of Approved Research Projects

1. **Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records**
   The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

   This project will focus on evaluating and improving the measurement of state programs in the American Community Survey (ACS), the Current Population Survey (CPS) and the Survey of Income and Program Participation (SIPP). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway. This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. **Characterizing WIC participants and likely eligible non-participants of WIC**
   WIC data linked to ACS data can provide characteristic information for women, infants, and children participating in the WIC program. Additionally, infants and children with a high probability of being eligible for WIC can be estimated using ACS information on family structure, reported income, and public assistance.[1] The estimated eligible infants and children can be matched to the administrative WIC data to determine who is estimated to be eligible but not participating in the program, helping agencies determine unmet need. The project results can help state agencies improve outreach efforts. This research helps the Census Bureau better understand their survey and census data.

3. **Improve Census Bureau Record Linkage Methods**
   The Census Bureau's Person Identification Validation System (PVS) uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. **Research, Testing and Operations for the 2020 Census**

   The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to

1 Eligible pregnant and breastfeeding women cannot be identified in ACS data.

AMERICAN OVERSIGHT

pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

A. validating and enhancing the Master Address File (MAF);[2]
B. designing and assigning resources to carry out the 2020 Census;[3]
C. unduplicating public, private, and census lists; and
D. imputing missing data.[4]

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

---

2 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.
3 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.
4 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

AMERICAN OVERSIGHT

MEMORANDUM OF UNDERSTANDING THROUGH WHICH THE U.S. CENSUS BUREAU IS ACQUIRING ADMINISTRATIVE DATA FROM THE STATE OF MARYLAND FAMILY INVESTMENT ADMINISTRATION, DEPARTMENT OF HUMAN RESOURCES

Agreement No. 0094-2015-NFE-05

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau ("Census Bureau") and the State of Maryland Family Investment Administration ("FIA"), Department of Human Resources ("DHR") for the acquisition of Supplemental Nutrition Assistance Program ("SNAP") and Temporary Assistance for Needy Families ("TANF") data contained in the Client Automated Resource and Eligibility System ("CARES") and the Maryland WORKS system.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the state agency to share SNAP data and enter into this agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026. The Food and Nutrition Act of 2008 limits the use of SNAP recipient information to those directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the SNAP program because Census will provide to the state copies of its tabulations of the data for the state to use in administering its SNAP program.

Additional authority for the state program agency to enter into this agreement is Md. Code Ann., Human Services § 1-201, General Provisions Article, Section 4-202, *et seq.*, and COMAR 07.01.07.04 and COMAR.

3. TERMS AND CONDITIONS

Pursuant to this agreement, the State of Maryland FIA DHR, hereinafter referred to as "the state program agency" shall transfer records to the Census Bureau from the CARES and Maryland WORKS system, hereinafter referred to as "the state data" and as described in Attachment A of this agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. Maintaining confidentiality of

AMERICAN OVERSIGHT

these data is guaranteed under Title 13 U.S.C, Section 9, and the Privacy Act of 1974. Only Census Bureau staff and Special Sworn Status ("SSS") researchers will have access to the data. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes. When the Census Bureau publicly releases information related to this research, it may not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau shall link the state data to census data, survey data and administrative records data. The Census Bureau shall use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau shall also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

   i. To transfer to the Census Bureau via secure File Transfer Protocol ("FTP") or appropriately encrypted CD-ROM or DVD-ROM, data from the CARES for the years 2004—2016 and from the Maryland WORKS system for the years 2004—2016, as described in Attachment A.

   ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, record length and data dictionary.

   iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers may not contain any state data or direct identifiers.

   Research projects exploring whether the administrative records represent the same individuals in survey or census households may need access to name data. Access to name data will only be granted through approval by the Census Bureau Data Stewardship Executive Policy Committee. Researchers may not have access to Social Security Numbers.

   iv. To allow the Census Bureau staff and SSS researchers to use the state data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

   i. To grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.

   ii. To provide the state program agency, within six (6) months of the receipt of acceptable data quality and acceptable file layouts, selected tabulations of the state data linked to the American Community Survey. These

AMERICAN OVERSIGHT

tabulations shall describe the demographic and household characteristics of residents who are likely to be eligible for SNAP, but who do not participate in the program.

iii. To the extent permitted by law to allow the state program agency the opportunity to review and provide comments, clearance, or rejection of pre-publication copies of any report or other document containing information derived from the state data and resulting from use under this agreement of the state data. If no response is received from the state program agency within thirty (30) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no response is received within three (3) business days from delivery of the reminder notice, the state program agency shall be deemed to have approved the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this agreement.

4. CONTACTS

The parties mutually agree that the following named individual is to be designated as custodian of the files on behalf of the Census Bureau and shall be personally responsible for the observance of all conditions of use, and for the establishment and maintenance of security arrangements to prevent unauthorized use, as specified in the agreement. The Census Bureau agrees to notify the state program agency within fifteen (15) days of any changes of custodianship.

Custodian:

J. Trent Alexander
Data Custodian
U.S. Census Bureau
4600 Silver Hill Road, 2K133
Washington DC 20233
(301) 763-9810
j.trent.alexander@census.gov

Processing Sites:

Bowie Computer Center
Suitland Federal Center
Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the state program agency and the Census Bureau, respectively:

AMERICAN OVERSIGHT

State agency POC:

Fern Hill
Assistant Director
Bureau of Systems Development and Management
Office of Programs
Family Investment Administration
Department of Human Resources
311 West Saratoga Street
Baltimore, MD 21201
(410) 767-7064
fern.hill@maryland.gov

Census Bureau POC:

Amy O'Hara
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement shall terminate five (5) years following the date on which it becomes effective. If, at the end of five (5) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, **in order to determine whether it should be revised, renewed or canceled.** The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Notwithstanding all other provisions of this agreement, the Parties agree that:

a. This agreement may be amended at any time by written mutual consent of both parties.

b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

The parties to this agreement envision that upon expiration or termination of this agreement, that the parties shall execute a new agreement permitting the Census Bureau continued use of the original state data. For this reason, the original state data shall be retained by the Census Bureau after expiration or termination of this agreement, unless the state program agency notifies the Census Bureau in writing that the original state data are not to be retained by the Census Bureau past the expiration or termination of this agreement. If, upon expiration or termination of this agreement, the state program agency notifies the Census Bureau Point of Contact in writing that the

AMERICAN OVERSIGHT

original state data covered by this agreement are not to be retained by the Census Bureau, the data shall be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law

If, upon expiration or termination of this agreement, the Census Bureau retains the original state data, Census Bureau researchers shall cease and desist all use of the state data until such time that a new agreement is executed which permits the use of the state data by Census Bureau researchers. The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

7. CONFIDENTIALITY

Md. Code Ann., Human Services § 1-201 protects the confidentiality of the state data. The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r3 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the Chief Information Officer ("CIO"), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*." Security controls and subsequent assessments are to be completed based on the final categorization.

AMERICAN OVERSIGHT

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team ("US CERT"). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

8. APPROVALS

RJ 1/27/15

Ron Jarmin (Date)
Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

Rosemary M Malone 3/4/15

Rosemary Malone (Date)
Executive Director
Family Investment Administration of the Department of Human Resources

Vincent Kilduff 2/4/15

Vince Kilduff (Date)
Deputy Executive Director
Family Investment Administration of the Department of Human Resources

AMERICAN OVERSIGHT

Attachment A: Data Elements

1. Data Requirements

Data from the CARES for each program for the years 2004-2016, and from the Maryland WORKS system for each program for the years 2004—2016 will include, when available:

a. Case unit identifiers,
b. Complete case unit address history (residence, mailing),
c. History of benefit amounts received (monthly),
d. Income reporting requirement (simplified reporting, change reporting, etc.),
e. Gross income (monthly),
f. Net income (monthly),
g. Eligibility and denial information,
h. Identifiers for individuals in case units, and
i. The following information on individuals in a case unit:
    i. Name
    ii. Social Security Number
    iii. Contact phone number
    iv. Contact phone number type (residence/home, message, business, cell)
    v. Email address
    vi. Relationship to primary recipient
    vii. Race
    viii. Hispanic origin/Ethnicity
    ix. Sex
    x. Date of birth
    xi. Education
    xii. Employment
    xiii. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)
    xiv. History of membership in case unit

AMERICAN OVERSIGHT

Attachment B: Description of Approved Research Projects

1. **Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records**

   The U.S. Census Bureau administers multiple household surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

   This project will focus on evaluating and improving the measurement of state programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

   This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. **Characterizing likely eligible non-participants of SNAP**

   Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. **Improve Census Bureau Record Linkage Methods**

   The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to

AMERICAN OVERSIGHT

each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research and Planning for the 2020 Census

The Census Bureau intends to test and potentially use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau intends to use state program information, along with data from federal, state, and private sources to pursue the following four research initiatives, leading to improvements in quality and efficiency of 2020 Census operations:

A. validating and enhancing the Master Address File (MAF);[1]
B. designing and assigning resources to carry out the 2020 Census;[2]
C. unduplicating public, private, and census lists; and
D. imputing missing data.[3]

Data quality will be explored using 2010 decennial census data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census to assess accuracy based on the level of aggregation.

---

1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.
2 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.
3 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

AMERICAN OVERSIGHT

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE COALITION FOR THE HOMELESS OF HOUSTON/HARRIS COUNTY

Agreement No. 0094-FY16-NFE-0038

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Coalition for the Homeless of Houston/Harris County for the acquisition of Homeless Management Information System (HMIS) data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the Houston/Harris County Coalition for the Homeless to share HMIS data and enter into this agreement is through the Homeless Management Information System Policies and Procedures of the Houston/Harris County Continuum of Care, which states that the Houston/Harris /County Coalition for the Homeless may disclose data "to conduct a study or research project approved by the CoC".

3. TERMS AND CONDITIONS

Pursuant to this agreement, the Coalition for the Homeless of Houston/Harris County, hereinafter referred to as "the program agency" shall transfer records to the Census Bureau from the administration of HMIS, hereinafter referred to as "the program data" and as described in Attachment A of this agreement. All data that the program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and Special Sworn Status ("SSS") researchers will have access to the data. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes. When the Census Bureau publicly releases information related to this research, it may not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the program data to census data, survey data and administrative records data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the program data to provide new and improved estimates of population characteristics related to program participation.

AMERICAN OVERSIGHT

a. The program agency agrees:

i. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) or appropriately encrypted CD-ROM or DVD-ROM, data from the HMIS for the years 2004—2021, as described in Attachment A.

ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, record length and data dictionary.

iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the program data. Record linkage identifiers may not contain any program data or direct identifiers.

Research projects exploring whether the administrative records represent the same individuals in survey or census households may need access to name data. Access to name data will only be granted through approval by the Census Bureau Data Stewardship Executive Policy Committee. Researchers may not have access to Social Security Numbers.

iv. To allow the Census Bureau staff and SSS researchers to use the program data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

i. To the extent provided by law, to grant access to the program data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the agreement to prevent unauthorized use.

Processing Sites: Bowie Computer Center
Suitland Federal Center
Census Bureau Research Data Centers

AMERICAN OVERSIGHT

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the program agency and the Census Bureau, respectively:

Program agency POC:

Erol Fetahagic
HMIS System Administrator and Analyst
Coalition for the Homeless of Houston/Harris County
600 Jefferson, suite 2050
Houston, TX 77002
832-531-6013
efetahagic@homelesshouston.org

Census Bureau POC:

Dr. Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement shall terminate five (5) years following the date on which it becomes effective. If, at the end of five (5) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, **in order to determine whether it should be revised, renewed or canceled.** The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the program agency.

Notwithstanding all other provisions of this agreement, the Parties agree that:

a. This agreement may be amended at any time by written mutual consent of both parties.

b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

The original program data received from the program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the program agency establishes a different timetable as clarified, when necessary, in Section 3. Terms and

AMERICAN OVERSIGHT

Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of program records with linkage identifiers and data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

7. CONFIDENTIALITY

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the Chief Information Officer ("CIO"), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

AMERICAN OVERSIGHT

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*." Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team ("US CERT"). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

8. APPROVALS

RJ 3/30/16

Ron Jarmin (Date)
Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

03.31.2016

Marilyn Brown (Date)
President/CEO
Coalition for the Homeless of Houston/Harris County

AMERICAN OVERSIGHT

Attachment A: Data Elements

1. Data Requirements

Data from the administration of HMIS for the years 2004—2021 will include, when available:

a. Case unit identifiers,
b. Complete monthly case unit address history (residence, mailing),
c. History of benefit amounts received (monthly),
d. Income reporting requirement (simplified reporting, change reporting, etc.),
e. Gross income (monthly),
f. Net income (monthly),
g. Eligibility and denial information,
h. Identifiers for individuals in case units, and
i. The following information on individuals in a case unit:
    i. Name
    ii. Social Security Number
    iii. Case unit/main contact phone number
    iv. Relationship to primary recipient
    v. Race
    vi. Hispanic origin/Ethnicity
    vii. Sex
    viii. Date of birth
    ix. Education
    x. Employment
    xi. History of membership in case unit (i.e. all shelter entry and exit dates).

AMERICAN OVERSIGHT

Attachment B: Description of Approved Research Projects

1. **Evaluation and Improvement of Demographic Surveys Using Program and Federal Administrative Records**

   The U.S. Census Bureau administers multiple household surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the program data to investigate survey frame coverage, survey effects and survey non-response.

   This project will focus on evaluating and improving the measurement of programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

   This project will include additional studies that use administrative records from state and federal programs (including the program data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. **Characterizing likely eligible non-participants of SNAP**

   Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. **Improve Census Bureau Record Linkage Methods**

   The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to

AMERICAN OVERSIGHT

each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. **Research, Testing and Operations for the 2020 Census**

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

A. validating and enhancing the Master Address File (MAF);[1]
B. designing and assigning resources to carry out the 2020 Census;[2]
C. unduplicating public, private, and census lists; and
D. imputing missing data.[3]

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

---

1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.
2 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.
3 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

AMERICAN OVERSIGHT

SPECIAL AGREEMENT
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
WOMEN, INFANTS, AND CHILDREN ADMINISTRATIVE DATA
FROM
THE INDIANA STATE DEPARTMENT OF HEALTH

Agreement # [2064-FY19-NFE-0216]

1. PARTIES AND PURPOSE

This Agreement establishes a relationship between the U.S. Census Bureau (Census Bureau) and the Indiana State Department of Health for the acquisition of Women, Infants, and Children (WIC) Administrative Data from the Indiana WIC program.

2. AUTHORITY

The authority for the Census Bureau to enter into this Agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the Indiana State Department of Health to share WIC data and enter into this Agreement is Section 17 of the Child Nutrition Act of 1966, 42 U.S.C. § 1786 and implementing regulations at 7 CFR Part 246. WIC regulations at 7 CFR 246.26(d)(1)(ii) limit the disclosure of WIC recipient information to those directly connected with the administration or enforcement of the WIC program. The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on October 24, 2017, has determined that the Census Bureau is directly connected with the administration of the WIC program because Census will provide to the state copies of its research tabulations for the state to use in administering its WIC program.

3. TERMS AND CONDITIONS

Pursuant to this Agreement, the Indiana State Department of Health hereinafter referred to as "the state program agency", will transfer records to the Census Bureau from the administration of WIC, hereinafter referred to as "the state data" and as described in Attachment A of this Agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and those Special Sworn Status (SSS) researchers participating in the projects will have access to the data. Access shall be limited to the minimum number of individuals necessary. Any data, records, or other information shared through this research Agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it will not be disclosed in individually-identifiable form that permits the identification of any individual respondents, businesses, organizations, or institutions, and results will meet

AMERICAN OVERSIGHT

Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. To the extent provided by law, the Census Bureau will recognize the state program agency as the owner of the original data in the form that it is delivered to the Census Bureau, prior to its integration with confidential Census data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

   i. To transfer an encrypted, password-protected zip file to the Census Bureau via secure FTP (File Transfer Protocol) using the Census Bureau's SFTP site, data from the administration of WIC for January 2017— September 2020, as described in Attachment A.

   ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this Agreement; including active participant definitions, a record layout, record count, and record length.

   iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers will not contain any state data or direct identifiers.

   iv. To allow the Census Bureau staff and Special Sworn Status (SSS) researchers to use the state data at the Processing Sites listed in Section 4 of this Agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this Agreement.

b. The Census Bureau agrees:

   i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this Agreement and only for the projects listed in Attachment B or those approved in writing by both parties.

   ii. To provide the state program agency with a copy of data tabulations that the Census Bureau will create for Census research purposes. Specifically, the Census Bureau will provide the state program agency with data tabulations based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American Community Survey (ACS). Data tabulations shall include estimated rates of program eligibility and access/participation for the state overall and by various demographic, economic, and household characteristics and by county when the data allow. It also will include distributions across the same characteristics both for program participants and for those who are estimated to be eligible but do not participate. The data tabulations will be delivered either within six (6) months from the date that the state administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.

AMERICAN OVERSIGHT

iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to WIC and resulting from use under this Agreement of the state data. If no comments are received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this Agreement.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this Agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the Agreement to prevent unauthorized use. The parties mutually agree that the following locations are designated for data processing, analysis, and storage within the Census Network:

Sites: Bowie Computer Center or Other Approved Census Computer Centers
Suitland Federal Center
Federal Statistical Research Data Centers
Census Approved Cloud Services

The parties mutually agree that the following named individuals will be designated as points of contact for the Agreement on behalf of the state program agency and the Census Bureau, respectively:

Indiana WIC POC:

Laura Chavez
WIC Director
Indiana State Department of Health
2 N Meridian St
Indianapolis, IN 46204
(317) 234-6158
LChavez2@isdh.IN.gov

Census Bureau POC: Michael Berning
Assistant Division Chief
Data Acquisition and Curation
Economic Reimbursable Surveys Division
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-2028
michael.a.berning@census.gov

AMERICAN OVERSIGHT

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This Agreement is effective on the date on which it is signed by both parties. The Agreement will terminate two (2) years following the date on which it becomes effective. If, at the end of two (2) years, the parties wish to continue the relationship, they must execute a new agreement.

Notwithstanding all other provisions of this Agreement, the Parties agree that:

a. This Agreement may be amended at any time by written mutual consent of both parties.

b. Either party may terminate this Agreement upon thirty (30) days written notice to the other party.

To the extent permitted by federal law, the original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3, Terms and Conditions. Any revisions to the data retention timetable after the execution of this Agreement will be stated in writing in an amendment to this Agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this Agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this Agreement.

To promote organizational transparency, and in support of data discovery for current and future research projects, the U.S. Census Bureau posts non-sensitive data documentation to public-facing websites. This documentation, such as a record layout or data dictionary, can include file descriptions, variable lists, variable labels and valid values for each variable.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this Agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this Agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this Agreement, whether written, printed, recorded,

AMERICAN OVERSIGHT

produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

The Census Bureau will promptly consider and adjudicate, in accordance with Federal law, claims which may arise for damages of any nature arising out of a Census Bureau act under this Agreement. Such adjudication will be pursued under the Federal Tort Claims Act, 28 U.S.C. Section 2671 et seq., the Federal Employees Compensation Act, 5 U.S.C. Section 8101 et seq., or such other legal authority as may be pertinent. The U.S. Department of Justice shall determine the appropriate venues for any litigation arising under this Agreement.

7. CONFIDENTIALITY

A. IT Security

The Census Bureau will comply with all federal laws applicable to the privacy or security of data received pursuant to this Agreement. As a federal agency, the Census Bureau is not subject to state laws, however the Census Bureau will comply with the requirements of applicable state laws to the extent that they do not conflict with the Census Bureau's requirements under federal law.

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, United States Code. The data provided under this Agreement are confidential under 13, U.S.C. § 9. Per the Federal Cybersecurity Enhancement Act of 2015, these data are also protected from cybersecurity risks through screening of the systems that transmit the data. Upon receipt, all data acquired as a result of this Agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach.*" The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO (Chief Information Officer), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices.*" Security controls and subsequent assessments are to be completed based on the final categorization.

Cloud providers must be approved for at least moderate level information through the GSA FedRAMP process prior to acquiring any services. Census Bureau identifies, assesses and authorizes use based on the published FedRAMP results

AMERICAN OVERSIGHT

and an assessment of any Census Bureau (customer provided) controls implemented to protect the infrastructure and data. Security reporting on cloud providers is reported to the Department of Commerce on a regular basis under FISMA.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum M-17-12. Known or suspected losses of protected data are to be reported within one (1) hour of its discovery to the Bureau of the Census Computer Incident Response Team (BOC CIRT) who will report as required to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau becomes aware of a known breach of the State Data, the Census Bureau will contact the state program agency contacts to discuss the actions and potential remedies regarding the incident.

B. Disclosure Avoidance Review of Statistical Products

Title 13, Section 9 of the United States Code (U.S.C.) requires the Census Bureau to keep confidential the information collected from the public under the authority of Title 13. Section 214 of Title 13, U.S.C., and Sections 3551, 3559 and 3571 of Title 18, U.S.C., provide for the imposition of penalties of up to five years in prison and/or up to $250,000.00 in fines for wrongful disclosure of confidential census information.

Disclosure avoidance is the process for protecting the confidentiality of data, as required under Title 13 U.S.C. A disclosure of data occurs when someone can use published statistical information to identify an individual who has provided confidential information under a pledge of confidentiality. For data tabulations, the Census Bureau uses disclosure avoidance procedures to modify or remove the characteristics that put confidential information at risk for disclosure. Although a published table may appear to show information about a specific individual, the Census Bureau has taken steps to disguise or suppress the original data, while making sure the results are still useful. The techniques used by the Census Bureau to protect confidentiality in tabulations vary, depending on the type of data.

Noise infusion is the Census Bureau's preferred disclosure avoidance technique. By policy, noise infusion is applied to all data products that are reported with geographies smaller than a state. Noise infusion may be required for microdata releases, depending on the characteristics of the microdata and the specific variables that are to be released. Data that cannot be publicly released may still be analyzed within the Federal Statistical Research Data Centers (FSRDCs) by individuals who have Special Sworn Status; the results of such analyses must still go through a disclosure avoidance process prior to being publicly released.

The parties understand that Title 13 confidentiality protection and disclosure avoidance techniques apply to all work described in this Agreement. The disclosure avoidance disclosure methods are defined by the Census Bureau which has the responsibility of carrying out that work. Accordingly, upon completion of the tabulation, the data produced must be reviewed by the Census Bureau to ensure that no identifiable Title 13 data are or may be disclosed. Should the Census Bureau's Disclosure Review Board (DRB) determine that the requested statistical product does or reasonably could result in such disclosure, then the data product will be modified prior to approval for release to the party(ies) to this Agreement. The DRB must

AMERICAN OVERSIGHT

approve before a research product can be released to an individual who does not have SSS and a need to know, or moved to a computer not approved for controlled data according to Census' existing policies and procedures.

8. APPROVALS

K Deardorff 3/1/19

Kevin Deardorff (Date)
Chief, Economic Reimbursable Surveys Division
U.S. Census Bureau

2/14/19

Trent Fox (Date)
Chief of Staff
Indiana State Department of Health

AMERICAN OVERSIGHT

Attachment A: Data Elements

1. Data Requirements

Monthly data from the administration of WIC for January 2017—September 2020 will include, when available:

a. Case unit identifiers,
b. Active Participant definitions,
c. Complete monthly case unit address history (residence, mailing),
d. Monthly Benefits data (any of the available: benefits received date, benefits amount issued/received, and benefit amount redeemed),
e. Income reporting requirement (simplified reporting, change reporting, etc.),
f. Income (monthly),
g. Eligibility and denial information,
h. Identifiers for individuals in case units, and
i. The following information on individuals in a case unit:
    i. Name
    ii. Case unit/main contact phone number
    iii. Relationship to primary recipient
    iv. Recipient or Caretaker phone number
    v. Race
    vi. Hispanic origin/Ethnicity
    vii. Sex
    viii. Date of birth
    ix. Gross income (monthly)
    x. Net Income (monthly)
    xi. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)
    xii. Education
    xiii. Employment

AMERICAN OVERSIGHT

Attachment B: Description of Approved Research Projects

1. **Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records**

   The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

   This project will focus on evaluating and improving the measurement of state programs in the American Community Survey (ACS), the Current Population Survey (CPS) and the Survey of Income and Program Participation (SIPP). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

   This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. **Characterizing WIC participants and likely eligible non-participants of WIC**

   WIC data linked to ACS data can provide characteristic information for women, infants, and children participating in the WIC program. Additionally, infants and children with a high probability of being eligible for WIC can be estimated using ACS information on family structure, reported income, and public assistance.[1] The estimated eligible infants and children can be matched to the administrative WIC data to determine who is estimated to be eligible but not participating in the program, helping agencies determine unmet need. The project results can help state agencies improve outreach efforts. This research helps the Census Bureau better understand their survey and census data.

3. **Improve Census Bureau Record Linkage Methods**

   The Census Bureau's Person Identification Validation System (PVS) uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records. However, coverage for

1 Eligible pregnant and breastfeeding women cannot be identified in ACS data.

AMERICAN OVERSIGHT

some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

A. validating and enhancing the Master Address File (MAF);[2]
B. designing and assigning resources to carry out the 2020 Census;[3]
C. unduplicating public, private, and census lists; and
D. imputing missing data.[4]

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American population and economy. As Census and other Federal Statistical Agencies successfully

2 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.
3 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.
4 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

AMERICAN OVERSIGHT

integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

AMERICAN OVERSIGHT

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE INDIANA FAMILY & SOCIAL SERVICES ADMINISTRATION (FSSA)

Agreement No. [0094-FY16-NFE-0055]

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Indiana Family & Social Services Administration (FSSA) for the acquisition of Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF) data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the Indiana Family & Social Services Administration (FSSA) to share SNAP data and enter into this agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026. The Food and Nutrition Act of 2008 limits the use of SNAP recipient information to those directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the SNAP program because Census will provide to the state copies of its tabulations of the data for the state to use in administering its SNAP program.

The authority for the Indiana Family & Social Services Administration (FSSA) to share TANF data and enter into this agreement is the Public Health and Welfare Act, 42 U.S.C. § 613.

Additional authority for the Indiana Family & Social Services Administration (FSSA) to enter into this agreement is 45 CFR 5b.9(b).

3. TERMS AND CONDITIONS

Pursuant to this agreement, the Indiana Family & Social Services Administration (FSSA), hereinafter referred to as "the state program agency" shall transfer records to the Census Bureau from the administration of SNAP and TANF, hereinafter referred to as "the state data" and as described in Attachment A of this agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13

AMERICAN OVERSIGHT

U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and Special Sworn Status ("SSS") researchers will have access to the data. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it may not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

   i. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of SNAP and administration of TANF for the years 2004—2021, as described in Attachment A.

   ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, record length and data dictionary.

   iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers may not contain any state data or direct identifiers.

   Research projects exploring whether the administrative records represent the same individuals in survey or census households may need access to name data. Access to name data will only be granted through approval by the Census Bureau Data Stewardship Executive Policy Committee. Researchers may not have access to Social Security Numbers.

   iv. To allow the Census Bureau staff and SSS researchers to use the state data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

   i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.

   ii. To provide the state program agency a table package based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American

AMERICAN OVERSIGHT

Community Survey (ACS). A table package shall include estimated rates of program eligibility and access/participation for the state overall and by various demographic, economic, and household characteristics and by county when the data allow. It also will include distributions across the same characteristics both for program participants and for those who are estimated to be eligible but do not participate. The table package will be delivered either within six (6) months from the date that the state administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.

iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to SNAP and TANF and resulting from use under this agreement of the state data. If no comments are received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this agreement.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the agreement to prevent unauthorized use.

Processing Sites: Bowie Computer Center
Suitland Federal Center
Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency POC:

Adrienne M. Shields
Director, Division of Family Resources
Family & Social Services Administration/DFR
402 West Washington Street, Room W-392
Indianapolis, IN 46204
(317) 234-2373
Adrienne.Shields@fssa.in.gov

AMERICAN OVERSIGHT

Census Bureau POC: Dr. Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement shall terminate six (6) years following the date on which it becomes effective. If, at the end of six (6) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, **in order to determine whether it should be revised, renewed or canceled.** The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Notwithstanding all other provisions of this agreement, the Parties agree that:

a. This agreement may be amended at any time by written mutual consent of both parties.
b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

The original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3. Terms and Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with

AMERICAN OVERSIGHT

linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

7. CONFIDENTIALITY

45 CFR Part 5b – PRIVACY ACT REGULATIONS protect the confidentiality of the state data, as well as:

- Medicaid, 42 U.S.C. § 1396(a)(a)(7), 42 CFR Part 431.300-307;
- Temporary Assistance to Needy Families, 42 U.S.C. § 602 (a)(1)(A)(iv);
- Supplemental Nutrition Assistance Program, 7 U.S.C. § 2020 (e)(8);
- 7 CFR Part 272.1(c);
- Social Security Act, 42 U.S.C. § 1396(a)(a)(7);
- Social Security Administration Disclosure, 20 CFR Part 401;
- Child Support, 42 U.S.C. § 654(26);
- Public Assistance Programs (Public Welfare), 45 CFR Part 205.50; and
- U.S. Department of Labor Employment and Training Administration, 20 CFR Part 603.

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

- The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 *"Recommended Security Controls for Federal Information Systems and Organizations,"* as well as Special Publication 800-37r1 *"Guide for Applying the Risk Management Framework to Federal*

AMERICAN OVERSIGHT

Information Systems: A Security Life Cycle Approach." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the Chief Information Officer ("CIO"), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*." Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team ("US CERT"). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

8. APPROVALS

6/30/16

Ron Jarmin (Date)
Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

6/21/16

John J. Wernert, M.D., MHA (Date)
Secretary
Family & Social Services Administration

AMERICAN OVERSIGHT

Attachment A: Data Elements

1. Data Requirements

Data from the administration of SNAP and TANF for the years 2004—2021 will include, when available, but not limited to:

a. Case unit identifiers,
b. Complete monthly case unit address history (residence, mailing),
c. History of benefit amounts received (monthly),
d. Income reporting requirement (simplified reporting, change reporting, etc.),
e. Gross income (monthly),
f. Net income (monthly),
g. Eligibility and denial information,
h. Identifiers for individuals in case units, and
i. The following information on individuals in a case unit:
    i. Name
    ii. Social Security Number
    iii. Case unit/main contact phone number
    iv. Relationship to primary recipient
    v. Race
    vi. Hispanic origin/Ethnicity
    vii. Sex
    viii. Date of birth
    ix. Education
    x. Employment
    xi. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)
    xii. History of membership in case unit

AMERICAN OVERSIGHT

Attachment B: Description of Approved Research Projects

1. **Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records**

   The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

   This project will focus on evaluating and improving the measurement of state programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

   This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. **Characterizing likely eligible non-participants of SNAP**

   Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. **Improve Census Bureau Record Linkage Methods**

   The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to

AMERICAN OVERSIGHT

each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

A. validating and enhancing the Master Address File (MAF);[1]
B. designing and assigning resources to carry out the 2020 Census;[2]
C. unduplicating public, private, and census lists; and
D. imputing missing data.[3]

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American

---

1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.
2 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.
3 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

AMERICAN OVERSIGHT

population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

AMERICAN OVERSIGHT

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE STATE OF CONNECTICUT DEPARTMENT OF SOCIAL SERVICES

Agreement No. [2064-18-PAY-15]

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the State of Connecticut Department of Social Services (DSS) for the acquisition of Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF) data.

2. AUTHORITY

The authority for the Census Bureau to enter into this Agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the DSS to share SNAP data and enter into this Agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026. The Food and Nutrition Act of 2008 limits the use of SNAP recipient information to those directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on October 24, 2017, has determined that the Census Bureau is directly connected with the administration of the SNAP program because Census will provide to the state copies of its research tabulations for the state to use in administering its SNAP program.

The authority for the DSS to share TANF data and enter into this Agreement is consistent with Section 1137 of the Social Security Act and Section 205.50 of Title 45, Code of Federal Regulations.

Additional authority for the DSS to enter into this Agreement is Conn. Gen. Stat. § 17b-3.

3. TERMS AND CONDITIONS

Pursuant to this Agreement, the DSS, hereinafter referred to as "the state program agency" shall transfer records to the Census Bureau from the administration of SNAP and TANF, hereinafter referred to as "the state data" and as described in Attachment A of this Agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and those Special Sworn Status (SSS) researchers participating in the projects will have access to the data. Access shall be limited to the minimum number of individuals necessary. Any data, records, or other information shared

AMERICAN OVERSIGHT

through this research Agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it may not be disclosed in individually-identifiable form that permits the identification of any individual respondents, businesses, organizations, or institutions, and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. To the extent provided by law, the Census Bureau will recognize the state program agency as the owner of the original data in the form that it is delivered to the Census Bureau, prior to its integration with confidential Census data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

   i. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of SNAP and administration of TANF for the years 2004-2022, as described in Attachment A.

   ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this Agreement; including active participant definitions, a record layout, record count, record length and data dictionary.

   iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers may not contain any state data or direct identifiers.

   iv. To allow the Census Bureau staff and SSS researchers to use the state data at the Processing Sites listed in Section 4 of this Agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this Agreement.

b. The Census Bureau agrees:

   i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this Agreement and only for the projects listed in Attachment B or those approved in writing by both parties.

   ii. To provide the state program agency with a copy of data tabulations that the Census Bureau will create for Census research purposes. Specifically, the Census Bureau will provide the state program agency with data tabulations based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American Community Survey (ACS). Data tabulations shall include estimated rates of program eligibility and access/participation for the state overall and by various demographic, economic, and household characteristics and by county when the data allow. It also will include distributions across the same characteristics both for program participants

AMERICAN OVERSIGHT

and for those who are estimated to be eligible but do not participate. The data tabulations will be delivered either within six (6) months from the date that the state administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.

iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to SNAP and TANF and resulting from use under this Agreement of the state data. If no comments are received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this Agreement.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this Agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the Agreement to prevent unauthorized use. The parties mutually agree that the following locations are designated for data processing, analysis, and storage within the Census Network:

Sites: Bowie Computer Center or Other Approved Census Computer Centers
Suitland Federal Center
Federal Statistical Research Data Centers
Census Approved Cloud Services

The parties mutually agree that the following named individuals will be designated as points of contact for the Agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency POC:

Peter Hadler
Program Administration Manager
Department of Social Services
55 Farmington Avenue
Hartford, CT 06105
(860) 424-5385
peter.hadler@ct.gov

AMERICAN OVERSIGHT

Census Bureau POC: Michael Berning
Assistant Division Chief
Data Acquisition and Curation
Economic Reimbursable Surveys Division
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-2028
michael.a.berning@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. FUNDING

The total amount to be paid by the Census Bureau to the state program agency via Electronic Funds Transfer (EFT) is $20,000.00. Funding is provided as financial support to reimburse the state program agency for resources needed to develop, set up, complete the data extraction, and deliver an initial production file within the first two years of this Agreement, as described in Attachment C. The funding is only obligated for Task 1 in the Statement of Work (Attachment C) and an invoice must be submitted immediately following the completion of Task 1 and the funds must be transferred prior to September 30, 2021. Tasks 2-4 will be completed on a no-funds-exchanged basis. This Agreement is considered to be a firm commitment.

6. ACCOUNTING DATA

State Agency Accounting Data:

DUNS No.: **807854435**

EIN: **06-6000798**

Census Bureau Accounting Data:

Agency Location Code: **13-04-0001**

Project Code: **7008016**

Division Code: **2064**

Object Class Code: **25-30-07-00**

TAS: **013-X-4512-000**

Business Event Type Code (BETC): **DISB**

Funds Expiration: **9/30/2016**

Funds Cancellation Date: **9/30/2021**

Organization Code: **11-26-2064-00-00-00-01**

DUNS No.: **929955383**

EIN: **52-0204537**

Total Amount: **$20,000**

Agreement No.: **2064-18-PAY-15**

AMERICAN OVERSIGHT

7. FINANCIAL POINTS OF CONTACT

State Agency Financial Contact:

Michael Gilbert
Chief Financial Officer
Department of Social Services
55 Farmington Avenue
Hartford, CT 06105
(860) 424-5841
mike.gilbert@ct.gov

Census Bureau Financial Contact:

Darrell Blyden
Chief, Financial Services Center
Finance Division
U.S. Census Bureau
4600 Silver Hill Road
Washington, DC 20233
(301) 763-4390
Darrell.b.blyden@census.gov

8. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This Agreement is effective on the date on which it is signed by both parties. The Agreement shall terminate six (6) years following the date on which it becomes effective or December 31, 2024, whichever comes first. If, at the end of the Agreement, the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this Agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the Agreement, **in order to determine whether it should be amended, renewed or canceled.** The review will be conducted by the Census Bureau's Assistant Director for Economic Programs and the state program agency.

Notwithstanding all other provisions of this Agreement, the Parties agree that:

a. This Agreement may be amended at any time by written mutual consent of both parties.

b. Either party may terminate this Agreement upon thirty (30) days written notice to the other party.

To the extent permitted by federal law, the original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3, Terms and Conditions. Any revisions to the data retention timetable after the execution of this Agreement will be stated in writing in an amendment to this Agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

AMERICAN OVERSIGHT

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this Agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this Agreement.

To promote organizational transparency, and in support of data discovery for current and future research projects, the U.S. Census Bureau posts non-sensitive data documentation to public-facing websites. This documentation, such as a record layout or data dictionary, can include file descriptions, variable lists, variable labels and valid values for each variable.

9. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this Agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this Agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this Agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

The Census Bureau will promptly consider and adjudicate, in accordance with Federal law, claims which may arise for damages of any nature arising out of a Census Bureau act under this Agreement. Such adjudication will be pursued under the Federal Tort Claims Act, 28 U.S.C. Section 2671 et seq., the Federal Employees Compensation Act, 5 U.S.C. Section 8101 et seq., or such other legal authority as may be pertinent. The U.S. Department of Justice shall determine the appropriate venues for any litigation arising under this Agreement.

10. CONFIDENTIALITY

A. IT Security

Connecticut General Statutes protect the confidentiality of the state data, including but not limited to Conn. Gen. Stat. § 17b-90, as well as:

- Medicaid, 42 U.S.C. § 1396a(a)(7), 42 CFR Part 431.300-307;
- Temporary Assistance to Needy Families, 42 U.S.C. § 602 (a)(1)(A)(iv);
- Supplemental Nutrition Assistance Program, 7 U.S.C. § 2020 (e)(8);
- 7 CFR Part 272.1(c);
- Social Security Act, 42 U.S.C. § 1396(a)(a)(7);
- Social Security Administration Disclosure, 20 CFR Part 401;

AMERICAN OVERSIGHT

- Child Support, 42 U.S.C. § 654(26);
- Public Assistance Programs (Public Welfare), 45 CFR Part 205.50; and
- U.S. Department of Labor Employment and Training Administration, 20 CFR Part 603.

The Census Bureau will comply with all federal laws applicable to the privacy or security of data received pursuant to this Agreement. As a federal agency, the Census Bureau is not subject to state laws, however the Census Bureau will comply with the requirements of applicable state laws to the extent that they do not conflict with the Census Bureau's requirements under federal law.

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, United States Code. The data provided under this Agreement are confidential under 13, U.S.C. § 9. Per the Federal Cybersecurity Enhancement Act of 2015, these data are also protected from cybersecurity risks through screening of the systems that transmit the data. Upon receipt, all data acquired as a result of this Agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO (Chief Information Officer), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*." Security controls and subsequent assessments are to be completed based on the final categorization.

Cloud providers must be approved for at least moderate level information through the GSA FedRAMP process prior to acquiring any services. Census Bureau identifies, assesses and authorizes use based on the published FedRAMP results and an assessment of any Census Bureau (customer provided) controls implemented to protect the infrastructure and data. Security reporting on cloud providers is reported to the Department of Commerce on a regular basis under FISMA.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum M-17-12. Known or suspected losses of protected data are to be reported within one (1) hour of its discovery to the Bureau of the Census Computer Incident Response Team (BOC CIRT) who will report as required to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau becomes aware of a known

AMERICAN OVERSIGHT

breach of the State Data, the Census Bureau will contact the state program agency contacts to discuss the actions and potential remedies regarding the incident.

B. Disclosure Avoidance Review of Statistical Products

Title 13, Section 9 of the United States Code (U.S.C.) requires the Census Bureau to keep confidential the information collected from the public under the authority of Title 13. Section 214 of Title 13, U.S.C., and Sections 3551, 3559 and 3571 of Title 18, U.S.C., provide for the imposition of penalties of up to five years in prison and/or up to $250,000.00 in fines for wrongful disclosure of confidential census information.

Disclosure avoidance is the process for protecting the confidentiality of data, as required under Title 13 U.S.C. A disclosure of data occurs when someone can use published statistical information to identify an individual who has provided confidential information under a pledge of confidentiality. For data tabulations, the Census Bureau uses disclosure avoidance procedures to modify or remove the characteristics that put confidential information at risk for disclosure. Although a published table may appear to show information about a specific individual, the Census Bureau has taken steps to disguise or suppress the original data, while making sure the results are still useful. The techniques used by the Census Bureau to protect confidentiality in tabulations vary, depending on the type of data.

Noise infusion is the Census Bureau's preferred disclosure avoidance technique. By policy, noise infusion is applied to all data products that are reported with geographies smaller than a state. Noise infusion may be required for microdata releases, depending on the characteristics of the microdata and the specific variables that are to be released. Data that cannot be publicly released may still be analyzed within the Federal Statistical Research Data Centers (FSRDCs) by individuals who have Special Sworn Status; the results of such analyses must still go through a disclosure avoidance process prior to being publicly released.

The parties understand that Title 13 confidentiality protection and disclosure avoidance techniques apply to all work described in this Agreement. The disclosure avoidance disclosure methods are defined by the Census Bureau which has the responsibility of carrying out that work. Accordingly, upon completion of the tabulation, the data produced must be reviewed by the Census Bureau to ensure that no identifiable Title 13 data are or may be disclosed. Should the Census Bureau's Disclosure Review Board (DRB) determine that the requested statistical product does or reasonably could result in such disclosure, then the data product will be modified prior to approval for release to the party(ies) to this Agreement. The DRB must approve before a research product can be released to an individual who does not have SSS and a need to know, or moved to a computer not approved for controlled data according to Census' existing policies and procedures.

AMERICAN OVERSIGHT

11.APPROVALS

K Deardorff 10/29/18

Kevin Deardorff (Date)
Chief, Economic Reimbursable Surveys Division
U.S. Census Bureau

11/14/18

Roderick L. Bremby (Date)
Commissioner
Connecticut Department of Social Services

AMERICAN OVERSIGHT

Attachment A: Data Elements

1. Data Requirements

Monthly data from the administration of SNAP and TANF for the years 2004-2022 will include, when available:

a. Case unit identifiers,
b. Active Participant definitions,
c. Complete monthly case unit address history (residence, mailing),
d. Monthly Benefits data (any of the available: benefits received date, benefits amount issued/received, and benefit amount redeemed),
e. Income reporting requirement (simplified reporting, change reporting, etc.),
f. Gross income (monthly),
g. Net income (monthly),
h. Eligibility and denial information,
i. Identifiers for individuals in case units,
j. Benefit certification period,
k. Primary language, 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. Relationship to primary recipient
    v. Race
    vi. Hispanic origin/Ethnicity
    vii. Sex
    viii. Date of birth
    ix. Gross income (monthly)
    x. Net Income (monthly)
    xi. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)
    xii. Education
    xiii. Employment
    xiv. Penalty data
    xv. Work status
    xvi. Disability
    xvii. Reasonable accommodations

AMERICAN OVERSIGHT

Attachment B: Description of Approved Research Projects

1. **Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records**

   The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

   This project will focus on evaluating and improving the measurement of state programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

   This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. **Characterizing likely eligible non-participants of SNAP**

   Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. **Improve Census Bureau Record Linkage Methods**

   The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to

AMERICAN OVERSIGHT

each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

A. validating and enhancing the Master Address File (MAF);[1]
B. designing and assigning resources to carry out the 2020 Census;[2]
C. unduplicating public, private, and census lists; and
D. imputing missing data.[3]

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American

1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.
2 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.
3 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

AMERICAN OVERSIGHT

population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

AMERICAN OVERSIGHT

Attachment C: Statement of Work SNAP and TANF Data Extraction

Statement of Work
for the
U.S. Census Bureau Funding of the Data Extraction by the
Connecticut Department of Social Services for
SNAP and TANF Administrative Data

Under the referenced MOU [2064-18-PAY-15] through which the Census Bureau is acquiring SNAP and TANF Administrative Data from the Connecticut Department of Social Services ("DSS") , Census Bureau funding reimburses the DSS efforts to develop a process to analyze, design and extract SNAP and TANF data for the years 2004-2022, by providing funds to develop a process to complete the following tasks:

Task 1 – Analysis, Design, and Initial File Delivery

Through this task, the DSS has agreed to develop a process to provide SNAP and TANF recipient data to the US Census Bureau. This data exists in - DSS EMS and ImpaCT computer systems. While there is no charge for the data, a considerable amount of design, programming, and testing work is needed to extract the data elements needed by the Census Bureau and create a series of "flat files" for transmission to the Census Bureau. DSS will develop a process to extract SNAP and TANF case and client details for January 1, 2004 through September 2016, create a test file, review the file for accuracy, and provide it to the Census Bureau, along with a data dictionary and record layout, or other similar documentation. Analysis, design, and testing is expected to be completed by January 1, 2019, with delivery of an initial test file expected to be completed by January 1, 2019.

Task 2 – Delivery of 2004-2016 Data

Through this task, the data from January 2004 through September 2016 can be provided after Task 1 is complete. This is expected to be completed by January 1, 2020.

Task 3 – Delivery of 2016-2018 Data

Through this task, the October 2016 – December 2018 data can be provided after Task 2 is complete. This is expected to be completed by July 1, 2020. DSS may

AMERICAN OVERSIGHT

provide the Census Bureau with two separate files per month for this timeframe – one file from each of two computer systems – because relevant data will be obtained from two separate systems and may not readily be combined into a single file.

Task 4 – Delivery of 2019-2022 Data

Through this task, the 2019-2022 data can be provided after Task 3 is complete. Once the file query for Task 4 is developed, DSS expects to provide Census Bureau with monthly files within 90 days of each monthly query (such that the last monthly data from 2019 will be provided by the end of March 2020). This entire task is expected to be completed by April 1, 2023.

AMERICAN OVERSIGHT

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE LOS ANGELES HOMELESS SERVICES AUTHORITY

Agreement No. [0094-FY16-NFE-0045]

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Los Angeles Homeless Services Authority (LAHSA) for the acquisition of Homeless Management Information System (HMIS) data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for LAHSA to share HMIS data and enter into this agreement is based on the HMIS Data Use and Disclosure, Section 4.1.3 of the HMIS Rules and Procedures provided by the U.S. Department of Housing and Urban Development.[1]

3. TERMS AND CONDITIONS

Pursuant to this agreement, LAHSA, hereinafter referred to as "the program agency" shall transfer records to the Census Bureau from the HMIS, hereinafter referred to as "the program data" and as described in Attachment A of this agreement. All data that the program agency agrees to provide the Census Bureau remains confidential. Maintaining confidentiality of these data is guaranteed under Title 13 U.S.C, Section 9, and the Privacy Act of 1974. Only Census Bureau staff and Special Sworn Status ("SSS") researchers will have access to the data. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes. When the Census Bureau publicly releases information related to this research, it may not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the program data to census data, survey data and administrative records data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the program data to provide new and improved estimates of population characteristics related to program participation.

---

1 Section 4.1.3 Allowable HMIS Uses and Disclosures of Protected Personal Information (PPI), states in pertinent part: A Covered Homeless Organization may use or disclose PPI from an HMIS under the following circumstances: (1) To provide or coordinate services to an individual; (2) for functions related to payment or reimbursement for services; (3) to carry out administrative functions, including but not limited to legal, audit, personnel, oversight and management functions; or (4) for creating de-identified PPI.

AMERICAN OVERSIGHT

a. The program agency agrees:

i. On an annual basis, to transfer to the Census Bureau via secure File Transfer Protocol (FTP), or appropriately encrypted CD-ROM or DVD-ROM, data from the HMIS for the years 2004—2021. The data to be transferred is described in Attachment A.

ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, record length and data dictionary.

iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the program data. Record linkage identifiers may not contain any program data or direct identifiers.

Research projects exploring whether the administrative records represent the same individuals in survey or census households may need access to name data. Access to name data will only be granted through approval by the Census Bureau Data Stewardship Executive Policy Committee. Researchers may not have access to Social Security Numbers.

iv. To allow the Census Bureau staff and SSS researchers to use the program data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

i. To the extent provided by law, to grant access to the program data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the agreement to prevent unauthorized use.

Processing Sites: Bowie Computer Center
Suitland Federal Center
Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the program agency and the Census Bureau, respectively:

AMERICAN OVERSIGHT

Program agency POC:

Peter Lynn
Executive Director
Los Angeles Homeless Services Authority
811 Wilshire Boulevard, 6th Floor
Los Angeles, California 90017

Census Bureau POC: Dr. Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date of the last party's signature. The agreement shall terminate six (6) years following the date on which it becomes effective. If, at the end of six (6) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, in order to determine whether it should be revised, renewed or canceled. The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the program agency.
Notwithstanding all other provisions of this agreement, the Parties agree that:

a. This agreement may be amended at any time by written mutual consent of both parties.
b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

The original program data received from the program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the program agency establishes a different timetable as clarified, when necessary, in Section 3. Terms and Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the data will not be discontinued due to the expiration

AMERICAN OVERSIGHT

or termination of this agreement. Furthermore, the use of de-identified program records with linkage identifiers and data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

7. CONFIDENTIALITY

Confidentiality of HMIS data is covered by the HMIS Data Use and Disclosure Section of the HMIS Policies and Procedures provided by the U.S. Department of Housing and Urban Development. It states that the HMIS Lead Agency collects HMIS data from organizations that directly enter data into the HMIS with the knowledge and authority of the CoC Steering Committee. HMIS data may only be collected, used, or disclosed for activities described in the HMIS Data Use and Disclosure section of the HMIS Policies and Procedures.

The Census Bureau assumes an obligation to keep all data received from other federal and program agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach.*" The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the Chief Information Officer ("CIO"), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

AMERICAN OVERSIGHT

All information and information systems are categorized in accordance with NIST FIPS 199 *"Standards for Security Categorization of Federal Information and Information Systems"* and NIST Special Publication 800-60r1 *"Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices."* Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team ("US CERT"). Once the Census Bureau becomes aware of a known breach of the program data, the Census Bureau will contact the identified program agency contacts within twenty-four (24) hours to discuss the actions and potential remedies regarding the incident.

8. APPROVALS

RL 5/25/14

Ron Jarmin (Date)
Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

6/7/16

Peter Lynn (Date)
Executive Director
Los Angeles Homeless Services Authority

AMERICAN OVERSIGHT

Attachment A: Data Elements

1. Data Requirements

Data from the administration of HMIS for the years 2004—2021 will include, when available:

a. HMIS identifier (HMIS ID)
b. Client's Program Enrollment identifier (Application ID),
c. Last known permanent address and client destination address
d. Permanent Supportive Housing unit site address
e. Total monthly income with income benefits and non-cash income sources,
f. Identifier that groups individuals to one unique household (Household ID), and
g. The following information on individuals in a household:
    i. Name
    ii. Head of Household status
    iii. Social Security Number
    iv. Household's main contact phone number
    v. Relationship to Head of Household (primary recipient)
    vi. Race
    vii. Hispanic origin/Ethnicity
    viii. Sex
    ix. Date of birth
    x. Education
    xi. Employment and employment type (e.g. full-time vs. part-time)
    xii. Program type (e.g. emergency shelter, permanent supportive housing)
    xiii. Program name
    xiv. Program entry and exit dates

AMERICAN OVERSIGHT

Attachment B: Description of Approved Research Projects

1. **Evaluation and Improvement of Demographic Surveys Using Program and Federal Administrative Records**

   The U.S. Census Bureau administers multiple household surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the program data to investigate survey frame coverage, survey effects and survey non-response.

   This project will focus on evaluating and improving the measurement of programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

   This project will include additional studies that use administrative records from state and federal programs (including the program data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. **Characterizing likely eligible non-participants of SNAP**

   Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. **Improve Census Bureau Record Linkage Methods**

   The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would

AMERICAN OVERSIGHT

have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. **Research, Testing and Operations for the 2020 Census**

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

A. validating and enhancing the Master Address File (MAF);[2]
B. designing and assigning resources to carry out the 2020 Census;[3]
C. unduplicating public, private, and census lists; and
D. imputing missing data.[4]

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. **Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes**

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of

---

2 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.
3 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.
4 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

AMERICAN OVERSIGHT

comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

AMERICAN OVERSIGHT

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE FLORIDA DEPARTMENT OF CHILDREN AND FAMILIES

Agreement No. [FL DCF: ESS 2016-01]
[U.S. Census Bureau: 0094-2016-PAY-003]

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Florida Department of Children and Families for the acquisition of Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF) data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the Florida Department of Children and Families to share SNAP data and enter into this agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026. The Food and Nutrition Act of 2008 limits the use of SNAP recipient information to those directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the SNAP program because the Census Bureau will provide to the state copies of its tabulations of the data for the state to use in administering its SNAP program.

The authority for the Florida Department of Children and Families to share TANF data and enter into this agreement is the Public Health and Welfare Act, 42 U.S.C. § 613.

3. TERMS AND CONDITIONS

Pursuant to this agreement, the Florida Department of Children and Families, hereinafter referred to as "the state program agency" shall transfer records to the Census Bureau from the administration of SNAP and TANF, hereinafter referred to as "the state data" and as described in Attachment A of this agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and Special Sworn Status ("SSS") researchers will have access to the data. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes. When the Census Bureau publicly releases information related to this research, it

AMERICAN OVERSIGHT

may not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

   i. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of SNAP and administration of TANF for the years 2009—2020, as described in Attachment A.

   ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, record length and data dictionary.

   iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers may not contain any state data or direct identifiers.

   Research projects exploring whether the administrative records represent the same individuals in survey or census households may need access to name data. Access to name data will only be granted through approval by the Census Bureau Data Stewardship Executive Policy Committee. Researchers may not have access to Social Security Numbers.

   iv. To allow the Census Bureau staff and SSS researchers to use the state data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

   i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.

   ii. To provide the state program agency, within six (6) months of the time the state data is processed and provided to Census Bureau research staff, selected tabulations of the state SNAP and TANF data linked to the American Community Survey. SNAP profile tabulations shall describe the demographic and household characteristics of residents who are likely to be eligible for SNAP, but who do not participate in the program.

   iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to SNAP and TANF and resulting from use under this agreement of the state data. If no

AMERICAN OVERSIGHT

comments are received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comments regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this agreement.

4. CONTACTS

The parties mutually agree that the following named individual is to be designated as custodian of the files on behalf of the Census Bureau and shall be personally responsible for the observance of all conditions of use, and for the establishment and maintenance of security arrangements to prevent unauthorized use, as specified in the agreement. The Census Bureau agrees to notify the state program agency within fifteen (15) days of any changes of custodianship.

Custodian:

J. Trent Alexander
Data Custodian
U.S. Census Bureau
4600 Silver Hill Road, 2K133
Washington DC 20233
(301) 763-9810
j.trent.alexander@census.gov

Processing Sites:

Bowie Computer Center
Suitland Federal Center
Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency POC:

Janice "JD" Johnson
Agreement Manager
Department of Children and Families
1317 Winewood Boulevard, Building 3, Room 461
(850) 717-4110
jd.johnson@myflfamilies.com

State program agency POC:

Peter Bull
Data Manager
Department of Children and Families
1317 Winewood Boulevard, Building 3, Room 424
(850) 717-4088
peter.bull@myflfamilies.com

AMERICAN OVERSIGHT

Census Bureau POC: Dr. Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. FUNDING

The total amount to be paid by the Census Bureau to the state program agency via Electronic Funds Transfer (EFT) is $20,000.00. Funding is provided to reimburse the state program agency for resources needed to set up and complete the data extraction as described in Attachment C. This Agreement is considered to be a firm commitment. The funding will be sent to the Florida Department of Children and Families within 60 days from the receipt of invoice by the Census Bureau.

6. ACCOUNTING DATA

State Agency Accounting Data:

Appropriation No.:

CAN:

DUNS No.: **6056043500000**

EIN: **59-3458463**

Total Amount:

Control Number:

Census Bureau Accounting Data:

Agency Location Code: **13-04-0001**

Project Code: **7008001**

Division Code: **0094**

Object Class Code: **25-30-07-00**

TAS: **013 X 4512 000**

Business Event Type Code (BETC): **DISB**

Funds Expiration: **No Year**

Funds Cancellation Date: **No Year**

Organization Code: **11-09-0094-00-00-00-00**

DUNS No.: **929955383**

EIN: **52-0204537**

AMERICAN OVERSIGHT

Total Amount: **$20,000.00**

Agreement No.: **0094-2016-PAY-003**

7. FINANCIAL POINTS OF CONTACT

State Agency Financial Contact:

Joella McGoogan
Budget Liaison
Department of Children and Families
1317 Winewood Boulevard, Building 3, Room 102
(850) 717-4102
joella.mcgoogan@myflfamilies.com

Census Bureau Financial Contact:

Darrell Blyden
Chief, Financial Services Center
Finance Division
U.S. Census Bureau
4600 Silver Hill Road
Washington, DC 20233
(301) 763-4390
Darrell.b.blyden@census.gov

8. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement shall terminate five (5) years following the date on which it becomes effective. If, at the end of five (5) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, **in order to determine whether it should be revised, renewed or canceled.** The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Notwithstanding all other provisions of this agreement, the Parties agree that:

a. This agreement may be amended at any time by written mutual consent of both parties.

b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

The original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3. Terms and Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original state data will be

AMERICAN OVERSIGHT

expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

9. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law and DCF or other state and federal representatives shall have the right to make on-site inspections of records relevant to this agreement.

10. CONFIDENTIALITY

Pursuant to section 71A of the Florida Administrative Code and Chapters 39, 119, 812, 815, 817, 839, or 877, Florida Statutes which protects the confidentiality of the state data, as well as:

- Medicaid, 42 U.S.C. § 1396(a)(a)(7), 42 CFR Part 431.300-307;
- Temporary Assistance to Needy Families, 42 U.S.C. § 602 (a)(1)(A)(iv);
- Supplemental Nutrition Assistance Program, 7 U.S.C. § 2020 (e)(8);
- 7 CFR Part 272.1(c);
- Social Security Act, 42 U.S.C. § 1396(a)(a)(7);
- Social Security Administration Disclosure, 20 CFR Part 401;
- Child Support, 42 U.S.C. § 654(26);
- Public Assistance Programs (Public Welfare), 45 CFR Part 205.50; and
- U.S. Department of Labor Employment and Training Administration, 20 CFR Part 603.

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

AMERICAN OVERSIGHT

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the Chief Information Officer ("CIO"), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*." Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team ("US CERT"). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

11. APPROVALS

3/23/16

Ron Jarmin (Date)
Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

3/23/16

Jeri Flora (Date)
Program Director
Economic Self-Sufficiency

3/24/16

Joseph Vastola (Date)
Chief Information Officer
Office of Information Technology Services

AMERICAN OVERSIGHT

Attachment A: Data Elements

1. Data Requirements

Data from the administration of SNAP and TANF for the years 2009—2020 will include:

a. Case unit identifiers,
b. Residence address history (ZIP Code and County only),
c. History of benefit amounts received (monthly),
d. Eligibility and denial information,
e. Identifiers for individuals in case units, and
f. The following information on individuals in a case unit:
    i. Name
    ii. Relationship to primary recipient
    iii. Race
    iv. Hispanic origin/Ethnicity
    v. Sex
    vi. Date of birth
    vii. History of membership in case unit

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000769

Attachment B: Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records

The U.S. Census Bureau administers multiple household surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of state programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing likely eligible non-participants of SNAP

Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to

AMERICAN OVERSIGHT

each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

A. validating and enhancing the Master Address File (MAF);[1]
B. designing and assigning resources to carry out the 2020 Census;[2]
C. unduplicating public, private, and census lists; and
D. imputing missing data.[3]

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

---

1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.
2 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.
3 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

AMERICAN OVERSIGHT

Attachment C: Statement of Work Funding SNAP and TANF Data Extraction

Statement of Work

for

the U.S. Census Bureau Funding of the Data Extraction by the Florida Department of Children and Families for SNAP and TANF Administrative Data

Under the referenced FL DCF agreement # ESS 2016-01/Census Bureau agreement # 0094-2016-PAY-003 through which the Census Bureau is acquiring SNAP and TANF Administrative Data from the Florida Department of Children and Families, Census Bureau funding reimburses the Florida Department of Children and Families' efforts to extract SNAP and TANF data for the years 2009-2020, by providing funds to complete the following tasks:

Task 1 – Analysis, Design, and Initial File Delivery

Through this task, the Florida Department of Children and Families (DCF) has agreed to provide SNAP and TANF recipient data to the US Census Bureau. This data exists in the Florida Online Receipt Integrated Data Access (FLORIDA) System mainframe. While there is no charge for the data, a considerable amount of design, programming, and testing work is needed to extract the data elements needed by the Census Bureau and create a series of "flat files" for transmission to the Census Bureau. DCF shall extract SNAP and TANF case and client details for CY2009 through CY2015, create a series of files, review the files for accuracy, and provide them to the Census Bureau, along with a data dictionary and record layout, or other similar documentation. This task is expected to be completed by Spring/April 2016 with delivery of all CY2009-CY2015 files.

Task 2 – Delivery of 2016 Data

Through this task, the CY2016 data can be provided after CY2016 is complete. This is expected to be completed by January 31, 2017.

Task 4 – Delivery of 2017 Data

Through this task, the CY2017 data can be provided after CY2017 is complete. This is expected to be completed by January 31, 2018.

Task 5 – Delivery of 2018 Data

Through this task, the CY2018 data can be provided after CY2018 is complete. This is expected to be completed by January 31, 2019.

AMERICAN OVERSIGHT

Task 6 – Delivery of 2019 Data

Through this task, the CY2019 data can be provided after CY2019 is complete. This is expected to be completed by January 31, 2020.

Task 7 – Delivery of 2020 Data

Through this task, the CY2020 data can be provided after CY2020 is complete. This is expected to be completed by January 31, 2021.

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000773

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE STATE OF HAWAII DEPARTMENT OF HUMAN SERVICES

Agreement No. [2064-FY18-NFE-0162]

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the State of Hawaii Department of Human Services for the acquisition of Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF) data.

2. AUTHORITY

The authority for the Census Bureau to enter into this Agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the State of Hawaii Department of Human Services to share SNAP data and enter into this Agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026. The Food and Nutrition Act of 2008 limits the use of SNAP recipient information to those directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on October 24, 2017 has determined that the Census Bureau is directly connected with the administration of the SNAP program because Census will provide to the state copies of its research tabulations for the state to use in administering its SNAP program.

The authority for the State of Hawaii Department of Human Services to share TANF data and enter into this Agreement is consistent with Section 1137 of the Social Security Act and Section 205.50 of Title 45, Code of Federal Regulations.

Additional authority for the Hawaii Department of Human Services to enter into this Agreement is 42 U.S.C. 1320b-7 and the routine use exception to the Privacy Act, 5 U.S.C. 552a(b)(3).

3. TERMS AND CONDITIONS

Pursuant to this Agreement, the State of Hawaii Department of Human Services, hereinafter referred to as "the state program agency" shall transfer records to the Census Bureau from the administration of SNAP and TANF, hereinafter referred to as "the state data" and as described in Attachment A of this Agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and those Special

AMERICAN OVERSIGHT

Sworn Status (SSS) researchers participating in the projects will have access to the data. Access shall be limited to the minimum number of individuals necessary. Any data, records, or other information shared through this research Agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it may not be disclosed in individually-identifiable form that permits the identification of any individual respondents, businesses, organizations, or institutions, and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. To the extent provided by law, the Census Bureau will recognize the state program agency as the owner of the original data in the form that it is delivered to the Census Bureau, prior to its integration with confidential Census data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

   i. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of SNAP for the years 2021-2023 and the administration of TANF for the years 2013—2023, as described in Attachment A.

   ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this Agreement; including definitions of active participants, a record layout, record count, record length and data dictionary.

   iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers may not contain any state data or direct identifiers.

   iv. To allow the Census Bureau staff and SSS researchers to use the state data at the Processing Sites listed in Section 4 of this Agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this Agreement.

b. The Census Bureau agrees:

   i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this Agreement and only for the projects listed in Attachment B or those approved in writing by both parties.

   ii. To provide the state program agency with a copy of data tabulations that the Census Bureau will create for Census research purposes. Specifically, the Census Bureau will provide the state program agency with data tabulations based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American Community Survey (ACS). Data tabulations shall include estimated rates of program eligibility and access/participation for the state

AMERICAN OVERSIGHT

overall and by various demographic, economic, and household characteristics and by county when the data allow. It also will include distributions across the same characteristics both for program participants and for those who are estimated to be eligible but do not participate. The data tabulations will be delivered either within six (6) months from the date that the state administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.

iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to SNAP and TANF and resulting from use under this Agreement of the state data. If no comments are received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this Agreement.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this Agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the Agreement to prevent unauthorized use. The parties mutually agree that the following locations are designated for data processing, analysis, and storage within the Census Network:

Sites: Bowie Computer Center
Suitland Federal Center
Federal Statistical Research Data Centers
Census Approved Cloud Services

The parties mutually agree that the following named individuals will be designated as points of contact for the Agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency SNAP POC:

Pamela Higa
SNAP Administrator
Benefits, Employment and Support Services Division
1010 Richards Street, Suite 512
Honolulu HI 96813
(808) 586-5722
PHiga@dhs.hawaii.gov

AMERICAN OVERSIGHT

State program agency TANF POC:

Paul Higa
Financial Assistance Program Administrator
Benefits, Employment and Support Services Division
1010 Richards Street, Suite 512
Honolulu HI 96813
(808) 586-5722
PHiga3@dhs.hawaii.gov

Census Bureau POC: Michael Berning
Assistant Division Chief
Data Acquisition and Curation
Economic Reimbursable Surveys Division
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-2028
michael.a.berning@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This Agreement is effective on the date on which it is signed by both parties. The Agreement shall terminate six (6) years following the date on which it becomes effective. If, at the end of six (6) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this Agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the Agreement, **in order to determine whether it should be revised, renewed or canceled.** The review will be conducted by the Census Bureau's Assistant Director for Economic Programs and the state program agency.

Notwithstanding all other provisions of this Agreement, the Parties agree that:

a. This Agreement may be amended at any time by written mutual consent of both parties.

b. Either party may terminate this Agreement upon thirty (30) days written notice to the other party.

To the extent permitted by federal law, the original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3, Terms and Conditions. Any revisions to the data retention timetable after the execution of this Agreement will be stated in writing in an amendment to this Agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

AMERICAN OVERSIGHT

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this Agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this Agreement.

To promote organizational transparency, and in support of data discovery for current and future research projects, the U.S. Census Bureau posts non-sensitive data documentation to public-facing websites. This documentation, such as a record layout or data dictionary, can include file descriptions, variable lists, variable labels and valid values for each variable.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this Agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this Agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this Agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

The Census Bureau will promptly consider and adjudicate, in accordance with Federal law, claims which may arise for damages of any nature arising out of a Census Bureau act under this Agreement. Such adjudication will be pursued under the Federal Tort Claims Act, 28 U.S.C. Section 2671 et seq., the Federal Employees Compensation Act, 5 U.S.C. Section 8101 et seq., or such other legal authority as may be pertinent. The U.S. Department of Justice shall determine the appropriate venues for any litigation arising under this Agreement.

7. CONFIDENTIALITY

A. IT Security

Hawaii Revised Statutes §346-10 protect the confidentiality of the state data, as well as:

- Medicaid, 42 U.S.C. § 1396(a)(a)(7), 42 CFR Part 431.300-307;
- Temporary Assistance to Needy Families, 42 U.S.C. § 602 (a)(1)(A)(iv);
- Supplemental Nutrition Assistance Program, 7 U.S.C. § 2020 (e)(8);
- 7 CFR Part 272.1(c);
- Social Security Act, 42 U.S.C. § 1396(a)(a)(7);
- Social Security Administration Disclosure, 20 CFR Part 401;
- Child Support, 42 U.S.C. § 654(26);

AMERICAN OVERSIGHT

- Public Assistance Programs (Public Welfare), 45 CFR Part 205.50; and
- U.S. Department of Labor Employment and Training Administration, 20 CFR Part 603.

The Census Bureau will comply with all federal laws applicable to the privacy or security of data received pursuant to this Agreement. As a federal agency, the Census Bureau is not subject to state laws, however the Census Bureau will comply with the requirements of applicable state laws to the extent that they do not conflict with the Census Bureau's requirements under federal law.

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, United States Code. The data provided under this Agreement are confidential under 13, U.S.C. § 9. Per the Federal Cybersecurity Enhancement Act of 2015, these data are also protected from cybersecurity risks through screening of the systems that transmit the data. Upon receipt, all data acquired as a result of this Agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO (Chief Information Officer), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*." Security controls and subsequent assessments are to be completed based on the final categorization.

Cloud providers must be approved for at least moderate level information through the GSA FedRAMP process prior to acquiring any services. Census Bureau identifies, assesses and authorizes use based on the published FedRAMP results and an assessment of any Census Bureau (customer provided) controls implemented to protect the infrastructure and data. Security reporting on cloud providers is reported to the Department of Commerce on a regular basis under FISMA.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum M-17-12. Known or suspected losses of protected data are to be reported within one (1) hour of its discovery to the Bureau of the Census Computer Incident Response Team (BOC CIRT) who will report as required to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau becomes aware of a known breach of the State Data, the Census Bureau will contact the state program agency contacts to discuss the actions and potential remedies regarding the incident.

AMERICAN OVERSIGHT

B. Disclosure Avoidance Review of Statistical Products

Title 13, Section 9 of the United States Code (U.S.C.) requires the Census Bureau to keep confidential the information collected from the public under the authority of Title 13. Section 214 of Title 13, U.S.C., and Sections 3551, 3559 and 3571 of Title 18, U.S.C., provide for the imposition of penalties of up to five years in prison and/or up to $250,000.00 in fines for wrongful disclosure of confidential census information.

Disclosure avoidance is the process for protecting the confidentiality of data, as required under Title 13 U.S.C. A disclosure of data occurs when someone can use published statistical information to identify an individual who has provided confidential information under a pledge of confidentiality. For data tabulations, the Census Bureau uses disclosure avoidance procedures to modify or remove the characteristics that put confidential information at risk for disclosure. Although a published table may appear to show information about a specific individual, the Census Bureau has taken steps to disguise or suppress the original data, while making sure the results are still useful. The techniques used by the Census Bureau to protect confidentiality in tabulations vary, depending on the type of data.

Noise infusion is the Census Bureau's preferred disclosure avoidance technique. By policy, noise infusion is applied to all data products that are reported with geographies smaller than a state. Noise infusion may be required for microdata releases, depending on the characteristics of the microdata and the specific variables that are to be released. Data that cannot be publicly released may still be analyzed within the Federal Statistical Research Data Centers (FSRDCs) by individuals who have Special Sworn Status; the results of such analyses must still go through a disclosure avoidance process prior to being publicly released.

The parties understand that Title 13 confidentiality protection and disclosure avoidance techniques apply to all work described in this Agreement. The disclosure avoidance disclosure methods are defined by the Census Bureau which has the responsibility of carrying out that work. Accordingly, upon completion of the tabulation, the data produced must be reviewed by the Census Bureau to ensure that no identifiable Title 13 data are or may be disclosed. Should the Census Bureau's Disclosure Review Board (DRB) determine that the requested statistical product does or reasonably could result in such disclosure, then the data product will be modified prior to approval for release to the party(ies) to this Agreement. The DRB must approve before a research product can be released to an individual who does not have SSS and a need to know, or moved to a computer not approved for controlled data according to Census' existing policies and procedures.

AMERICAN OVERSIGHT

8. APPROVALS

11/19/18

Kevin Deardorff (Date)
Chief, Economic Reimbursable Surveys Division
U.S. Census Bureau

12/3/18

Pankaj Bhanot (Date)
Director
Department of Human Services

AMERICAN OVERSIGHT

Attachment A: Data Elements

1. Data Requirements - SNAP

Monthly data from the Hawaii Department of Human Services administration of SNAP for the years 2021—2023 will include, when available:

a. Case unit identifiers,
b. Active Participant definitions,
c. Complete monthly case unit address history (residence, mailing),
d. Monthly Benefits data (any of the available: benefits received date, benefits amount issued/received, and benefit amount redeemed),
e. Income reporting requirement (simplified reporting, change reporting, etc.),
f. Gross income (monthly),
g. Net income (monthly),
h. Eligibility and denial information,
i. Identifiers for individuals in case units, and
j. The following information on individuals in a case unit:
    i. Name
    ii. Social Security Number
    iii. Case unit/main contact phone number
    iv. Relationship to primary recipient
    v. Race
    vi. Hispanic origin/Ethnicity
    vii. Sex
    viii. Date of birth
    ix. Gross income (monthly)
    x. Net Income (monthly)
    xi. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)
    xii. Education
    xiii. Employment

2. Data Requirements - TANF

Monthly data from the Hawaii Department of Human Services administration of TANF for the years 2013—2023 will include, when available:

a. Case unit identifiers,
b. Active Participant definitions,
c. Complete monthly case unit address history (residence, mailing),
d. Monthly Benefits data (any of the available: benefits received date, benefits amount issued/received, and benefit amount redeemed),
e. Income reporting requirement (simplified reporting, change reporting, etc.),
f. Gross income (monthly),
g. Net income (monthly),
h. Eligibility and denial information,
i. Identifiers for individuals in case units, and
j. The following information on individuals in a case unit:
    i. Name
    ii. Social Security Number
    iii. Case unit/main contact phone number
    iv. Relationship to primary recipient
    v. Race
    vi. Hispanic origin/Ethnicity

AMERICAN OVERSIGHT

vii. Sex
viii. Date of birth
ix. Gross income (monthly)
x. Net Income (monthly)
xi. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)
xii. Education
xiii. Employment

AMERICAN OVERSIGHT

Attachment B: Description of Approved Research Projects

1. **Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records**

   The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

   This project will focus on evaluating and improving the measurement of state programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

   This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. **Characterizing likely eligible non-participants of SNAP**

   Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. **Improve Census Bureau Record Linkage Methods**

   The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to

AMERICAN OVERSIGHT

each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

A. validating and enhancing the Master Address File (MAF);[1]
B. designing and assigning resources to carry out the 2020 Census;[2]
C. unduplicating public, private, and census lists; and
D. imputing missing data.[3]

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American

1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.
2 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.
3 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

AMERICAN OVERSIGHT

population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

AMERICAN OVERSIGHT

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM ADMINISTRATIVE DATA
FROM
THE STATE OF HAWAII DEPARTMENT OF HUMAN SERVICES

Agreement No. 0094-2015-NFE-006

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the State of Hawaii Department of Human Services for the acquisition of Supplemental Nutrition Assistance Program (SNAP) Administrative Data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the State of Hawaii Department of Human Services to share SNAP data and enter into this agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026. The Food and Nutrition Act of 2008 limits the use of SNAP recipient information to those directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the SNAP program because Census will provide to the state copies of its tabulations of the data for the state to use in administering its SNAP program.

Additional authority for the Hawaii Department of Human Services to enter into this agreement is 42 U.S.C. 1320b-7 and the routine use exception to the Privacy Act, 5 U.S.C. 552a(b)(3).

3. TERMS AND CONDITIONS

Pursuant to this agreement, the State of Hawaii Department of Human Services, hereinafter referred to as "the state program agency", will transfer records to the Census Bureau from the administration of SNAP, hereinafter referred to as "the state data" and as described in Attachment A of this agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. Maintaining confidentiality of these data is guaranteed under Title 13 U.S.C, Section 9, and the Privacy Act of 1974. Only Census Bureau staff and Special Sworn Status (SSS) researchers will have access to the data. Any data, records, or other information shared through this research agreement will be protected from unauthorized disclosure and will

AMERICAN OVERSIGHT

be used solely for statistical purposes. When the Census Bureau publicly releases information related to this research, it will not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

   i. To transfer to the Census Bureau via secure FTP (File Transfer Protocol) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of SNAP for the years 2013—2020, as described in Attachment A.

   ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, record length and data dictionary.

   iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers will not contain any state data or direct identifiers.

   Research projects exploring whether the administrative records represent the same individuals in survey or census households may need access to name data. Access to name data will only be granted through approval by the Census Bureau Data Stewardship Executive Policy Committee. Researchers will not have access to Social Security Numbers.

   iv. To allow the Census Bureau staff and Special Sworn Status (SSS) researchers to use the state data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

   i. To grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.

   ii. To provide the state program agency, within six (6) months of the time the data is processed and provided to Census Bureau research staff, selected tabulations of the state data linked to the American Community Survey. These tabulations will describe the demographic and household characteristics of residents who are likely to be eligible for SNAP, but who do not participate in the program.

AMERICAN OVERSIGHT

iii. To the extent permitted by law allow the state program agency the opportunity to review and provide comments, clearance, or rejection of pre-publication copies of any report or other document containing information derived from the state data pertaining to SNAP and resulting from use under this agreement of the state data. If no response is received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no response is received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have approved the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this agreement.

4. CONTACTS

The parties mutually agree that the following named individual is to be designated as custodian of the files on behalf of the Census Bureau and will be personally responsible for the observance of all conditions of use, and for the establishment and maintenance of security arrangements to prevent unauthorized use, as specified in the agreement. The Census Bureau agrees to notify the state program agency within fifteen (15) days of any changes of custodianship.

Custodian:
J. Trent Alexander
Data Custodian
U.S. Census Bureau
4600 Silver Hill Road, 2K133
Washington DC 20233
(301) 763-9810
j.trent.alexander@census.gov

Processing Sites:
Bowie Computer Center
Suitland Federal Center
Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency POC:
Pamela Higa
SNAP Administrator
Benefits, Employment and Support Services Division
820 Mililani Street, Suite 606
Honolulu HI 96813
808-586-5722
PHiga@dhs.hawaii.gov

AMERICAN OVERSIGHT

Census Bureau POC: Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement will terminate five (5) years following the date on which it becomes effective. If, at the end of five (5) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties will review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, **in order to determine whether it should be revised, renewed or canceled.** The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Notwithstanding all other provisions of this agreement, the Parties agree that:

a. This agreement may be amended at any time by written mutual consent of both parties.

b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

The original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3. Terms and Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

AMERICAN OVERSIGHT

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

7. CONFIDENTIALITY

Hawaii Revised Statutes §346-10 protect the confidentiality of the state data. The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r3 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO (Chief Information Officer), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*." Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau

AMERICAN OVERSIGHT

becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

8. APPROVALS

RJ 7/8/15

Ron Jarmin (Date)
Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

8/5/15

Rachael Wong, DrPH (Date)
Director
State of Hawaii Department of Human Services

AMERICAN OVERSIGHT

Attachment A: Data Elements

1. Data Requirements

Data from the Hawaii Department of Human Services administration of SNAP for the years 2013—2020 will include, when available:

a. Case unit identifiers,
b. Complete monthly case unit address history (residence, mailing),
c. History of benefit amounts received (monthly),
d. Income reporting requirement (simplified reporting, change reporting, etc.),
e. Gross income (monthly),
f. Net income (monthly),
g. Eligibility and denial information,
h. Identifiers for individuals in case units, and
i. The following information on individuals in a case unit:
    i. Name
    ii. Social Security Number
    iii. Relationship to primary recipient
    iv. Race
    v. Sex
    vi. Date of birth
    vii. Education
    viii. Employment
    ix. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)

AMERICAN OVERSIGHT

Attachment B: Description of Approved Research Projects

1. **Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records**

   The U.S. Census Bureau administers multiple household surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

   This project will focus on evaluating and improving the measurement of state programs in the American Community Survey (ACS), the Current Population Survey (CPS) and the Survey of Income and Program Participation (SIPP). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

   This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. **Characterizing likely eligible non-participants of SNAP**

   Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. **Improve Census Bureau Record Linkage Methods**

   The Census Bureau's Person Identification Validation System (PVS) uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records. However, coverage for

AMERICAN OVERSIGHT

some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research and Planning for the 2020 Census

The Census Bureau intends to test and potentially use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau intends to use state program information, along with data from federal, state, and private sources to pursue the following four research initiatives, leading to improvements in quality and efficiency of 2020 Census operations:

A. validating and enhancing the Master Address File (MAF);[1]
B. designing and assigning resources to carry out the 2020 Census;[2]
C. unduplicating public, private, and census lists; and
D. imputing missing data.[3]

Data quality will be explored using 2010 decennial census data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census to assess accuracy based on the level of aggregation.

1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.
2 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.
3 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

AMERICAN OVERSIGHT

Memorandum of Agreement

ALASKA
PERMANENT
FUND DIVIDEND
pfd.alaska.gov

Alaska Department of Revenue
Permanent Fund Dividend Division
PO Box 110462
Juneau, Alaska 99811-0462

Terms and Responsibilities

The PFDD agrees to provide the agency with the URL, login and password to access the data via the web upon the agency's compliance with the requirements of this agreement. The PFDD does not guarantee the availability or accuracy of information obtained by the agency from the PFDD's computer data files. The agency agrees to use information obtained through this agreement only for the purposes described in AS 43.23.017. The agency agrees to ensure that each subordinate employee given access to the PFD Government Extract data will be required to sign a CONFIDENTIALITY AGREEMENT REGARDING PERMANENT FUND DIVIDEND APPLICANT INFORMATION which includes all of the requirements provided in 15 AAC 23.253 (h). The agency agrees not to release, or allow its subordinate employees to release, information obtained through this agreement other than as provided herein.

Data Security and Confidentiality

The agency understands that PFD applicant data is confidential as prescribed by AS 43.23.017 and art. I, § 22, Constitution of Alaska. The agency hereby declares that safeguards are in place to prevent unauthorized access to PFD applicant data. The agency also hereby declares that access to the PFDD's computer data files will be limited to only those PFD applicant records necessary for the uses and purposes as stated in the business intent, as it meets AS 43.23.017.

Should the agency employ the services of a contractor who will have access to PFD applicant data, the agency will submit a statement to the PFDD, signed by the agency and the contractor affirming that the contractor and any subordinate employees having access to the information understand that the information is confidential and have a signed CONFIDENTIALITY AGREEMENT REGARDING PERMANENT FUND DIVIDEND APPLICANT INFORMATION which includes all of the requirements provided in 15 AAC 23.253(h). The agency understands the applicable provisions of AS 11.56.860 and 5 U.S.C. 552a (Privacy Act of 1974) regarding misuse of confidential information.

Prior Agreements Superseded and Effective Date

This agreement supersedes and makes null and void all previous agreements made between the PFDD and the agency with respect to access of the PFDD's computer data files. This agreement is effective on the date of signature below and will remain in effect as long as the agency's uses and purposes are consistent with those as stated in section three (3) above and the agency annually provides a certification agreeing to remain bound by all of the terms contained in this agreement. This agreement may be renegotiated to incorporate change upon notification in writing by both parties and approval by all signatories. This agreement may be rescinded at any time by either party upon notification in writing by the party rescinding the agreement that they no longer wish to be bound by the terms of this agreement.

I certify that I am authorized to sign this document.

Your Signature: **Date:**

Adam Galemore **12/21/2017**

This signature is not valid until you sign with myAlaska.

AMERICAN OVERSIGHT

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
WOMEN, INFANTS, AND CHILDREN ADMINISTRATIVE DATA
FROM
THE IDAHO DEPARTMENT OF HEALTH AND WELFARE

Agreement No. 0094-FY17-NFE-0089

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Idaho Department of Health and Welfare for the acquisition of Women, Infants, and Children (WIC) Administrative Data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the Idaho Department of Health and Welfare to share WIC data and enter into this agreement is Section 17 of the Child Nutrition Act of 1966, 42 U.S.C. § 1786 and implementing regulations at 7 CFR Part 246. WIC regulations at 7 CFR 246.26(d)(1)(ii) limit the disclosure of WIC recipient information to those directly connected with the administration or enforcement of the WIC program. The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the WIC program because Census will provide to the state copies of its tabulations of the data for the state to use in administering its WIC program.

3. TERMS AND CONDITIONS

Pursuant to this agreement, the Idaho Department of Health and Welfare, hereinafter referred to as "the state program agency", will transfer records to the Census Bureau from the administration of WIC, hereinafter referred to as "the state data" and as described in Attachment A of this agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and Special Sworn Status ("SSS") researchers will have access to the data. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it will not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses.

AMERICAN OVERSIGHT

The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

   i. To transfer to the Census Bureau via secure FTP (File Transfer Protocol) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of WIC for the years 2012—2021, as described in Attachment A.

   ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, and record length.

   iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers will not contain any state data or direct identifiers.

   iv. To allow the Census Bureau staff and Special Sworn Status (SSS) researchers to use the state data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

   i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.

   ii. To provide the state program agency a table package based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American Community Survey (ACS). A table package shall include estimated rates of program eligibility and access/participation for the state overall and by various demographic, economic, and household characteristics and by county when the data allow. It also will include distributions across the same characteristics both for program participants and for those who are estimated to be eligible but do not participate. The table package will be delivered either within six (6) months from the date that the state administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.

   iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to WIC and resulting from use under this agreement of the state data. If no comments are received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comment

AMERICAN OVERSIGHT

regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this agreement.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the agreement to prevent unauthorized use.

Processing Sites: Bowie Computer Center
Suitland Federal Center
Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency POC:

Cristi Litzsinger
Idaho WIC Program Manager
Division of Public Health
Department of Health and Welfare
450 West State Street
Boise, ID 83720-0036
(208) 334-5951
cristi.litzsinger@dhw.idaho.gov

Census Bureau POC: Dr. Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement will terminate six (6) years following the date on which it becomes effective. If, at the end of six (6) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties will review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, **in order to determine whether it should be revised, renewed or**

AMERICAN OVERSIGHT

canceled. The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Notwithstanding all other provisions of this agreement, the Parties agree that:

a. This agreement may be amended at any time by written mutual consent of both parties.

b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

The original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3. Terms and Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

7. CONFIDENTIALITY

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

AMERICAN OVERSIGHT

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO (Chief Information Officer), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*." Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

8. APPROVALS

12/12/16

Michael Thieme (Date)
Acting Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

1/6/17

Richard M. Armstrong (Date)
Director
Idaho Department of Health and Welfare

AMERICAN OVERSIGHT

Attachment A: Data Elements

1. Data Requirements

Monthly data from the administration of WIC for the years 2012—2021 will include, when available:

a. Case unit identifiers,
b. Complete monthly case unit address history (residence, mailing),
c. Benefit amounts received (monthly) or benefits received date (monthly),
d. Income reporting requirement (simplified reporting, change reporting, etc.),
e. Gross income (monthly),
f. Net income (monthly),
g. Eligibility and denial information,
h. Identifiers for individuals in case units, and
i. The following information on individuals in a case unit:
    i. Name
    ii. Case unit/main contact phone number
    iii. Relationship to primary recipient
    iv. Recipient or Caretaker phone number
    v. Race
    vi. Hispanic origin/Ethnicity
    vii. Sex
    viii. Date of birth

AMERICAN OVERSIGHT

Attachment B: Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records

The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of state programs in the American Community Survey (ACS), the Current Population Survey (CPS) and the Survey of Income and Program Participation (SIPP). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing WIC participants and likely eligible non-participants of WIC

WIC data linked to ACS data can provide characteristic information for women, infants, and children participating in the WIC program. Additionally, infants and children with a high probability of being eligible for WIC can be estimated using ACS information on family structure, reported income, and public assistance.[1] The estimated eligible infants and children can be matched to the administrative WIC data to determine who is estimated to be eligible but not participating in the program, helping agencies determine unmet need. The project results can help state agencies improve outreach efforts. This research helps the Census Bureau better understand their survey and census data.

3. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System (PVS) uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would

1 Eligible pregnant and breastfeeding women cannot be identified in ACS data.

AMERICAN OVERSIGHT

have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

A. validating and enhancing the Master Address File (MAF);[2]
B. designing and assigning resources to carry out the 2020 Census;[3]
C. unduplicating public, private, and census lists; and
D. imputing missing data.[4]

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of

2 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.
3 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.
4 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

AMERICAN OVERSIGHT

comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

AMERICAN OVERSIGHT

MODIFICATION TO THE
MEMORANDUM OF UNDERSTANDING BETWEEN THE
U.S. CENSUS BUREAU AND
THE LOS ANGELES HOMELESS SERVICES AUTHORITY
Modification # 0094-FY16-NFE-0045-001

This document amends the June 7, 2016 agreement #0094-FY16-NFE-0045 between the U.S. Census Bureau and the Los Angeles Homeless Services Authority (LAHSA) under which LAHSA agrees to transfer to the Census Bureau confidential data. The purpose of the amendment is to:

1. Add two additional projects to Attachment B: Description of Approved Research Projects:

6. Evaluating the Impact of Veterans Justice Programs on Homelessness, Incarceration, and Healthcare

The Veterans Justice Programs (VJP) is a key component of the Department of Veterans Affairs' commitment to ending Veteran homelessness. The VJP partners with local criminal justice agencies to identify Veterans who would benefit from treatment as an alternative to incarceration, and links them to VA and community-based services to prevent homelessness, end Veterans' cyclical contact with the criminal justice system, improve social and clinical outcomes, and facilitate recovery. The Healthcare for Reentry Veterans (HCRV) program, one of two VJP programs and the focus of this study, provides pre-release outreach, assessment, service linkage, and post-release case management services for Veterans released from state and federal prisons to promote successful community integration.

This will be the first comparative effectiveness study of HCRV, assessing homelessness, incarceration, and healthcare utilization of its clients compared to control groups that did not receive VJP services. Bureau of Justice Statistics (BJS) state prison data for Texas, California, and New York will be matched with VJP records to identify control groups of (1) veterans with current or recent involvement in the criminal justice system that have not accessed HCRV and (2) criminal-justice involved non-veterans. To evaluate program outcomes, these data will then be matched with shelter and local jail data in New York City, Houston and Harris County, Texas, and Los Angeles, CA to assess homeless service and local criminal justice system involvement as well as earnings and employment data from the Census Bureau, education data from the National Student Clearinghouse, and state prison reentry data from the BJS.

7. Tracking Service Usage and Geographic Mobility following Shelter Exit

There is little research describing the circumstances under which homeless adults exit homelessness and their subsequent life trajectories. This is generally a result of provider-based data systems that track people during a spell of homelessness and may capture information about precipitating factors, but do not track people beyond program exit or across localities. Studies on migration among homeless persons are particularly rare for this reason. One 1996 nationwide study found that 41 percent of homeless or formerly homeless single adults reported moving communities following the onset of homelessness, and 16 percent reported migrating across state lines, and less systematic findings suggest that homeless adults have stronger place-based ties than others. Beyond limiting our understanding of geographic mobility, these constraints have impeded research on the extent to which formerly homeless adults access services in other locations. Little research exists on the extent to which people homeless in one jurisdiction move and access homelessness or other services elsewhere, with the one study on migratory patterns of homeless service utilization focusing on homeless veterans.

AMERICAN OVERSIGHT

All other terms and conditions contained in the original Census Bureau/LAHSA agreement shall remain the same.

SIGNATURES:

On behalf of the Census Bureau, the undersigned individual hereby attests that he or she is authorized to enter into this amendment and agrees to all the terms specified herein.

3/2/17

Dr. John Eltinge (Date)
Assistant Director
Research and Methodology Directorate of U.S. Census Bureau

On behalf of LAHSA, the undersigned individual hereby attests that he or she is authorized to enter into this amendment and agrees to all the terms specified herein.

3/2/17

Peter Lynn (Date)
Executive Director
Los Angeles Homeless Services Authority

AMERICAN OVERSIGHT

Memorandum of Understanding Execution Routing Form

Contractor Name: United States Department of Commerce – Bureau of the Census
Contract Number: 0094-FY16-NFE-0045-001 CFDA: NONE
Project: HMIS Data Acquisition
Contract Amount: N/A
Contract Term: June 7, 2016 and then set to terminate six (6) years after Signature Date
This MOU is between LAHSA and the U.S. Census Bureau in which LAHSA provides data from HMIS to the U.S. Census Bureau.

Contract Execution ☐
Fiscal Approval Required Yes ☐ No ☒

Comment:

This modification to the MOU adds two additional projects to the Description of Approved Research Projects for this MOU.

Completed by
St. G Ellis
Contracts Specialist

Funder Agreement Executed ☐
3/1/17
Date

Approved generally by
[signature]
Contracts Unit Manager

3/2/17
Date

Approved, generally and specifically for Statement of Work, by
[signature]
Data and Research Manager

3/2/17
Date

Approved, generally and specifically for Performance Targets, by
N/A
Outcomes and Evaluation Manager

Date

RETURN TO CONTRACTS UNIT – SEE COMMENTS ABOVE ☐

READY FOR EXECUTION BY CFO AND EXECUTIVE DIRECTOR ☒

N/A
Chief Financial Officer

Date

Executive Execution by
[signature]
Executive Director

3/2/17
Date

AMERICAN OVERSIGHT

LAHSA
LOS ANGELES HOMELESS SERVICES AUTHORITY

ADMINISTRATIVE OFFICE
811 Wilshire Blvd., 6th Floor
Los Angeles, CA 90017
Ph: 213.683.3333
Fx: 213.892.0093
TTY: 213.553.8488
www.lahsa.org

MEMO

To: Katherine Reeves

From: Debra Neal, Administrative Assistant /Operation Unit

Date: March 7, 2017

CC: Shalon Zeferjahn, Contract Unit Manager

Re: Contract Number 0094-FY16-NFE-0045-001

Dear Mr. Eltinge:

Enclosed is the fully executed Memorandum of Understanding between Los Angeles Homeless Services Authority and The United States Department of Commerce- Bureau of the Census- HMIS Data Acquisition.

Please keep this Contract in your records for future reference and auditing purposes.

If you have any questions regarding this matter, please contact Steve Cuellar, Contract Specialist at (213) 683.3349 or via email scuellar@lahsa.org

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000809

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
WOMEN, INFANTS, AND CHILDREN ADMINISTRATIVE DATA
FROM
THE ALABAMA DEPARTMENT OF PUBLIC HEALTH

Agreement No. 0094-FY16-NFE-0072

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Alabama Department of Public Health for the acquisition of Women, Infants, and Children (WIC) Administrative Data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the Alabama Department of Public Health to share WIC data and enter into this agreement is Section 17 of the Child Nutrition Act of 1966, 42 U.S.C. § 1786 and implementing regulations at 7 CFR Part 246. WIC regulations at 7 CFR 246.26(e) limit the disclosure of WIC recipient information to those directly connected with the administration or enforcement of the WIC program. The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the WIC program because Census will provide to the state copies of its tabulations of the data for the state to use in administering its WIC program.

Additional authority for the Alabama Department of Public Health to enter into this agreement is Section 38-2-6 of the *Code of Alabama 1975* regarding the use and confidentiality of records concerning children, children's families, and public-assistance recipients and applicants.

The Census Bureau shall protect the information provided under this agreement in accordance with 13 U.S.C. Section 9. Both parties agree to comply with HIPAA to the extent applicable under this agreement. In the unlikely even protected health information (PHI), as that term is defined by HIPAA, is disclosed to the other party for any purpose, the receiving party will not use or disclose PHI other than as permitted or required by this Agreement and /or applicable law.

3. TERMS AND CONDITIONS

Pursuant to this agreement, the Alabama Department of Public Health, hereinafter referred to as "the State program agency", will transfer records to the Census Bureau

AMERICAN OVERSIGHT

from the administration of WIC, hereinafter referred to as "the State data" and as described in Attachment A of this agreement. All data that the State program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of these data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act of 1974. To the extent provided by law, only Census Bureau staff and Special Sworn Status (SSS) researchers will have access to the data. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and will be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it will not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the State data to census data, survey data and administrative records data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the State data to provide new and improved estimates of population characteristics related to program participation.

a. The State program agency agrees:

   i. To transfer to the Census Bureau via secure FTP (File Transfer Protocol) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of WIC for October 2014—2021, as described in Attachment A.

   ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, and record length.

   iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the State data. Record linkage identifiers will not contain any State data or direct identifiers.

   iv. To allow the Census Bureau staff and Special Sworn Status (SSS) researchers to use the State data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

   i. To the extent provided by law, to grant access to the State data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.

   ii. To provide the State program agency a table package based on at least two consecutive calendar years of State program participation administrative records linked to annual responses to the American Community Survey (ACS). A table package shall include estimated rates of program eligibility and access/participation for the State overall and by various demographic, economic, and household characteristics and by

AMERICAN OVERSIGHT

county when the data allow. It also will include distributions across the same characteristics both for program participants and for those who are estimated to be eligible but do not participate. The table package will be delivered either within six (6) months from the date that the State administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.

iii. To the extent permitted by law, allow the State program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the State data pertaining to WIC and resulting from use under this agreement of the State data. If no comments are received from the State program agency within fourteen (14) days from delivery of pre-publication documents to the State program agency, the Census Bureau shall send a reminder notice to the State program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the State program agency will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the State data under this agreement.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the agreement to prevent unauthorized use.

Processing Sites: Bowie Computer Center
Suitland Federal Center
Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the State program agency and the Census Bureau, respectively:

State program agency POC:

Amanda Martin
Alabama WIC Program Director
Bureau of Family Health Services
Alabama Department of Public Health
201 Monroe Street, Suite 1300
Montgomery, Alabama 36104
(334) 206-2927
Amanda.Martin@adph.state.al.us

AMERICAN OVERSIGHT

Census Bureau POC: Dr. Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement will terminate six (6) years following the date on which it becomes effective. If, at the end of six (6) years, the parties wish to continue the relationship, they must execute a new agreement.

This Memorandum of Understanding may be canceled at any time by either party providing a thirty (30) day written notice to the other party.

The parties will review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, **in order to determine whether it should be revised, renewed or canceled.** The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the State program agency.

Notwithstanding all other provisions of this agreement, the Parties agree that:

a. This agreement may be amended at any time by written mutual consent of both parties.

b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

The original State data received from the State program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the State program agency establishes a different timetable as clarified, when necessary, in Section 3. Terms and Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original State data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the State data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of State records with linkage identifiers and State data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

AMERICAN OVERSIGHT

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

7. CONFIDENTIALITY

Alabama Code section 38-2-6 protects the confidentiality of the State data, as well as WIC regulations at 7 CFR 246.26(e). The Census Bureau assumes an obligation to keep all data received from other federal, state, and tribal agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO (Chief Information Officer), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*." Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau

AMERICAN OVERSIGHT

becomes aware of a known breach of the State data, the Census Bureau will contact the identified State program agency contacts to discuss the actions and potential remedies regarding the incident.

8. APPROVALS

RJ 9/20/16

Ron Jarmin (Date)
Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

Amanda C. Martin 10/27/2016

Amanda Martin (Date)
Alabama WIC Program Director
Alabama Department of Public Health

Thomas M. Miller 11/8/16

Thomas M. Miller, M.D. (Date)
State Health Officer
Alabama Department of Public Health

APPROVED AS TO FORM AND
COMPLIANCE WITH APPLICABLE
RULES AND REGULATIONS
DEPT. OF PUBLIC HEALTH

NOV 4 2016

OFFICE OF GENERAL COUNSEL

AMERICAN OVERSIGHT

Attachment A: Data Elements

1. Data Requirements

Data from the administration of WIC beginning October 2014 -2021 will include, when available:

(a) Family ID
(b) Physical Address
(c) Reported Income
(d) Number in Household
(e) The following information on individuals:
    i) Participant ID
    ii) Name
    iii) Race
    iv) Ethnicity
    v) Sex
    vi) Date of Birth
    vii) Adjunct Program (if applicable)

AMERICAN OVERSIGHT

Attachment B: Description of Approved Research Projects

1. **Evaluation and Improvement of Demographic Surveys Using State, Federal and Tribal Administrative Records**

   The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the State data to investigate survey frame coverage, survey effects and survey non-response.

   This project will focus on evaluating and improving the measurement of State programs in the American Community Survey (ACS), the Current Population Survey (CPS) and the Survey of Income and Program Participation (SIPP). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

   This project will include additional studies that use administrative records from state, federal and tribal programs (including the State data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. **Characterizing WIC participants and likely eligible non-participants of WIC**

   WIC data linked to ACS data can provide characteristic information for women, infants, and children participating in the WIC program. Additionally, infants and children with a high probability of being eligible for WIC can be estimated using ACS information on family structure, reported income, and public assistance.[1] The estimated eligible infants and children can be matched to the administrative WIC data to determine who is estimated to be eligible but not participating in the program, helping agencies determine unmet need. The project results can help State agencies improve outreach efforts. This research helps the Census Bureau better understand their survey and census data.

3. **Improve Census Bureau Record Linkage Methods**

   The Census Bureau's Person Identification Validation System (PVS) uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records. However, coverage for

1 Eligible pregnant and breastfeeding women cannot be identified in ACS data.

AMERICAN OVERSIGHT

some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the State program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in State programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using State program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

A. validating and enhancing the Master Address File (MAF);[2]
B. designing and assigning resources to carry out the 2020 Census;[3]
C. unduplicating public, private, and census lists; and
D. imputing missing data.[4]

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American

---

2 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.
3 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.
4 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

AMERICAN OVERSIGHT

population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

AMERICAN OVERSIGHT

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE NEVADA DIVISION OF WELFARE AND SUPPORTIVE SERVICES

Agreement No. [2064-FY19-NFE-0267]

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Nevada Division of Welfare and Supportive Services (DWSS) for the acquisition of Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF) data.

2. AUTHORITY

The authority for the Census Bureau to enter into this Agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the Nevada DWSS to share SNAP data and enter into this Agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026. The Food and Nutrition Act of 2008 limits the use of SNAP recipient information to those directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on October 24, 2017 has determined that the Census Bureau is directly connected with the administration of the SNAP program because Census will provide to the state copies of its research tabulations for the state to use in administering its SNAP program.

The authority for the Nevada DWSS to share TANF data and enter into this Agreement is consistent with Section 1137 of the Social Security Act and Section 205.50 of Title 45, Code of Federal Regulations.

Additional authority for the Nevada DWSS to enter into this Agreement is the Nevada Statute, NRS 422A.342 regarding the custody, use, preservation and confidentiality of records, files and communications concerning applicants for and recipients of public assistances or assistance pursuant to Children's Health Insurance Program.

3. TERMS AND CONDITIONS

Pursuant to this Agreement, the Nevada DWSS, hereinafter referred to as "the state program agency" shall transfer records to the Census Bureau from the administration of SNAP and TANF, hereinafter referred to as "the state data" and as described in Attachment A of this Agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and those Special Sworn Status (SSS)

AMERICAN OVERSIGHT

researchers participating in the projects will have access to the data. Access shall be limited to the minimum number of individuals necessary. Any data, records, or other information shared through this research Agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it may not be disclosed in individually-identifiable form that permits the identification of any individual respondents, businesses, organizations, or institutions, and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. To the extent provided by law, the Census Bureau will recognize the state program agency as the owner of the original data in the form that it is delivered to the Census Bureau, prior to its integration with confidential Census data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

   i. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of SNAP and administration of TANF for the years 2017—2023, as described in Attachment A.

   ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this Agreement; including definitions of active participants, a record layout, record count, record length and data dictionary.

   iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers may not contain any state data or direct identifiers.

   iv. To allow the Census Bureau staff and SSS researchers to use the state data at the Processing Sites listed in Section 4 of this Agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this Agreement.

b. The Census Bureau agrees:

   i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this Agreement and only for the projects listed in Attachment B or those approved in writing by both parties.

   ii. To provide the state program agency with a copy of data tabulations that the Census Bureau will create for Census research purposes. Specifically, the Census Bureau will provide the state program agency with data tabulations based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American Community Survey (ACS). Data tabulations shall include estimated rates of program eligibility and access/participation for the state

AMERICAN OVERSIGHT

overall and by various demographic, economic, and household characteristics and by county when the data allow. It also will include distributions across the same characteristics both for program participants and for those who are estimated to be eligible but do not participate. The data tabulations will be delivered either within six (6) months from the date that the state administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.

iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to SNAP and TANF and resulting from use under this Agreement of the state data. If no comments are received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this Agreement.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this Agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the Agreement to prevent unauthorized use. The parties mutually agree that the following locations are designated for data processing, analysis, and storage within the Census Network:

Sites: Bowie Computer Center or Other Approved Census Computer Centers
Suitland Federal Center
Federal Statistical Research Data Centers
Census Approved Cloud Services

The parties mutually agree that the following named individuals will be designated as points of contact for the Agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency POC:

Steve H. Fisher
Administrator
Nevada Division of Welfare and Supportive Services
1470 College Parkway
(775) 684-0500
shfisher@dwss.nv.gov

AMERICAN OVERSIGHT

Census Bureau POC: Michael Berning
Assistant Division Chief
Data Acquisition and Curation
Economic Reimbursable Surveys Division
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-2028
michael.a.berning@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This Agreement is effective on the date on which it is signed by both parties. The Agreement shall terminate five (5) years following the date on which it becomes effective. If, at the end of five (5) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this Agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the Agreement, **in order to determine whether it should be revised, renewed or canceled.** The review will be conducted by the Census Bureau's Assistant Director for Economic Programs and the state program agency.

Notwithstanding all other provisions of this Agreement, the Parties agree that:

a. This Agreement may be amended at any time by written mutual consent of both parties.

b. Either party may terminate this Agreement upon thirty (30) days written notice to the other party.

To the extent permitted by federal law, the original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3, Terms and Conditions. Any revisions to the data retention timetable after the execution of this Agreement will be stated in writing in an amendment to this Agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this Agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this Agreement.

AMERICAN OVERSIGHT

To promote organizational transparency, and in support of data discovery for current and future research projects, the U.S. Census Bureau posts non-sensitive data documentation to public-facing websites. This documentation, such as a record layout or data dictionary, can include file descriptions, variable lists, variable labels and valid values for each variable.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this Agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this Agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this Agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

The Census Bureau will promptly consider and adjudicate, in accordance with Federal law, claims which may arise for damages of any nature arising out of a Census Bureau act under this Agreement. Such adjudication will be pursued under the Federal Tort Claims Act, 28 U.S.C. Section 2671 et seq., the Federal Employees Compensation Act, 5 U.S.C. Section 8101 et seq., or such other legal authority as may be pertinent. The U.S. Department of Justice shall determine the appropriate venues for any litigation arising under this Agreement.

7. CONFIDENTIALITY

A. IT Security

Nevada Statute, NRS 422A.342 protects the confidentiality of the state data, as well as:

- Medicaid, 42 U.S.C. § 1396(a)(a)(7), 42 CFR Part 431.300-307;
- Temporary Assistance to Needy Families, 42 U.S.C. § 602 (a)(1)(A)(iv);
- Supplemental Nutrition Assistance Program, 7 U.S.C. § 2020 (e)(8);
- 7 CFR Part 272.1(c);
- Social Security Act, 42 U.S.C. § 1396(a)(a)(7);
- Social Security Administration Disclosure, 20 CFR Part 401;
- Child Support, 42 U.S.C. § 654(26);
- Public Assistance Programs (Public Welfare), 45 CFR Part 205.50; and
- U.S. Department of Labor Employment and Training Administration, 20 CFR Part 603.

The Census Bureau will comply with all federal laws applicable to the privacy or security of data received pursuant to this Agreement. As a federal agency, the

AMERICAN OVERSIGHT

Census Bureau is not subject to state laws, however the Census Bureau will comply with the requirements of applicable state laws to the extent that they do not conflict with the Census Bureau's requirements under federal law.

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, United States Code. The data provided under this Agreement are confidential under 13, U.S.C. § 9. Per the Federal Cybersecurity Enhancement Act of 2015, these data are also protected from cybersecurity risks through screening of the systems that transmit the data. Upon receipt, all data acquired as a result of this Agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO (Chief Information Officer), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*." Security controls and subsequent assessments are to be completed based on the final categorization.

Cloud providers must be approved for at least moderate level information through the GSA FedRAMP process prior to acquiring any services. Census Bureau identifies, assesses and authorizes use based on the published FedRAMP results and an assessment of any Census Bureau (customer provided) controls implemented to protect the infrastructure and data. Security reporting on cloud providers is reported to the Department of Commerce on a regular basis under FISMA.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum M-17-12. Known or suspected losses of protected data are to be reported within one (1) hour of its discovery to the Bureau of the Census Computer Incident Response Team (BOC CIRT) who will report as required to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau becomes aware of a known breach of the State Data, the Census Bureau will contact the state program agency contacts to discuss the actions and potential remedies regarding the incident.

B. Disclosure Avoidance Review of Statistical Products

Title 13, Section 9 of the United States Code (U.S.C.) requires the Census Bureau to keep confidential the information collected from the public under the authority of Title 13. Section 214 of Title 13, U.S.C., and Sections 3551,

AMERICAN OVERSIGHT

3559 and 3571 of Title 18, U.S.C., provide for the imposition of penalties of up to five years in prison and/or up to $250,000.00 in fines for wrongful disclosure of confidential census information.

Disclosure avoidance is the process for protecting the confidentiality of data, as required under Title 13 U.S.C. A disclosure of data occurs when someone can use published statistical information to identify an individual who has provided confidential information under a pledge of confidentiality. For data tabulations, the Census Bureau uses disclosure avoidance procedures to modify or remove the characteristics that put confidential information at risk for disclosure. Although a published table may appear to show information about a specific individual, the Census Bureau has taken steps to disguise or suppress the original data, while making sure the results are still useful. The techniques used by the Census Bureau to protect confidentiality in tabulations vary, depending on the type of data.

Noise injection is the Census Bureau's preferred disclosure avoidance technique. By policy, noise injection is applied to all data products that are reported with geographies smaller than a state. In cases when it is not feasible to fully implement noise injection within the period of the contract, a transition plan for implementing noise injection or other provable privacy methods must be developed in coordination with the Census Bureau. Noise injection may be required for microdata releases, depending on the characteristics of the microdata and the specific variables that are to be released. Data that cannot be publicly released may still be analyzed within the Federal Statistical Research Data Centers (FSRDCs) by individuals who have Special Sworn Status; the results of such analyses must still go through a disclosure avoidance process prior to being publicly released.

The parties understand that Title 13 confidentiality protection and disclosure avoidance techniques apply to all work described in this Agreement. The disclosure avoidance disclosure methods are defined by the Census Bureau which has the responsibility of carrying out that work. Accordingly, upon completion of the tabulation, the data produced must be reviewed by the Census Bureau to ensure that no identifiable Title 13 data are or may be disclosed. Should the Census Bureau's Disclosure Review Board (DRB) determine that the requested statistical product does or reasonably could result in such disclosure, then the data product will be modified prior to approval for release to the party(ies) to this Agreement. The DRB must approve before a research product can be released to an individual who does not have SSS and a need to know, or moved to a computer not approved for controlled data according to Census' existing policies and procedures.

(This space intentionally left blank.)

AMERICAN OVERSIGHT

8. APPROVALS

FOR: [signature] 7/30/19

Kevin Deardorff (Date)
Chief, Economic Reimbursable Surveys Division
U.S. Census Bureau

[signature] 8/13/19

Steve H. Fisher (Date)
Administrator
Nevada Division of Welfare and Supportive Services

AMERICAN OVERSIGHT

Attachment A: Data Elements

1. Data Requirements

Monthly data from the administration of SNAP and TANF for the years 2017—2023 will include, when available:

a. Case unit identifiers,
b. Active Participant definitions,
c. Complete monthly case unit address history (residence, mailing),
d. Monthly Benefits data (any of the available: benefits received date, benefits amount issued/received, and benefit amount redeemed),
e. Income reporting requirement (simplified reporting, change reporting, etc.),
f. Gross income (monthly),
g. Net income (monthly),
h. Eligibility and denial information,
i. Identifiers for individuals in case units, and
j. The following information on individuals in a case unit:
    i. Name
    ii. Social Security Number
    iii. Case unit/main contact phone number
    iv. Relationship to primary recipient
    v. Race
    vi. Hispanic origin/Ethnicity
    vii. Sex
    viii. Date of birth
    ix. Gross income (monthly)
    x. Net Income (monthly)
    xi. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)
    xii. Education
    xiii. Employment

AMERICAN OVERSIGHT

Attachment B: Description of Approved Research Projects

1. **Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records**

   The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

   This project will focus on evaluating and improving the measurement of state programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

   This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. **Characterizing likely eligible non-participants of SNAP**

   Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. **Improve Census Bureau Record Linkage Methods**

   The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to

AMERICAN OVERSIGHT

each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

A. validating and enhancing the Master Address File (MAF);[1]
B. designing and assigning resources to carry out the 2020 Census;[2]
C. unduplicating public, private, and census lists; and
D. imputing missing data.[3]

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American

1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.
2 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.
3 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

AMERICAN OVERSIGHT

population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

AMERICAN OVERSIGHT

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE NORTH DAKOTA DEPARTMENT OF HUMAN SERVICES

Agreement No. 0094-FY17-NFE-0077

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Economic Assistance Division, North Dakota Department of Human Services, for the acquisition of Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF) data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the Economic Assistance Division, hereinafter referred to as "the state program agency," to share SNAP data and enter into this agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026. The Act limits the use of SNAP recipient information to those directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the SNAP program because the Census Bureau will provide to the state program agency copies of its tabulations of the data for the state program agency to use in administering its SNAP program.

The authority for the state program agency to share TANF data and enter into this agreement is the Public Health and Welfare Act, 42 U.S.C. § 613.

Pursuant to this agreement, the state program agency shall transfer records to the Census Bureau from the administration of SNAP and TANF, hereinafter referred to as "the state data" and as described in Attachment A of this agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and Special Sworn Status ("SSS") researchers will have access to the data. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it may not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines.

AMERICAN OVERSIGHT

The Census Bureau will link the state data to census data, survey data and administrative records data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

   i. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of SNAP and administration of TANF for the years 2004—2021, as described in Attachment A.

   ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, record length and data dictionary.

   iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers may not contain any state data or direct identifiers.

   iv. To allow the Census Bureau staff and SSS researchers to use the state data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

   i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.

   ii. To provide the state program agency a table package based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American Community Survey (ACS). A table package shall include estimated rates of program eligibility and access/participation for the state overall and by various demographic, economic, and household characteristics and by county when the data allow. It also will include distributions across the same characteristics both for program participants and for those who are estimated to be eligible but do not participate. The table package will be delivered either within six (6) months from the date that the state administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.

   iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to SNAP and TANF and resulting from use under this agreement of the state data. If no comments are received from the state

AMERICAN OVERSIGHT

program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this agreement.

3. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the agreement to prevent unauthorized use.

Processing Sites: Bowie Computer Center
Suitland Federal Center
Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency POC:

Carol Cartledge
Director of Economic Assistance Division
North Dakota Department of Human Services
600 E Boulevard Ave, Judicial Wing, 3rd Floor
Bismarck, ND 58505
(701) 328-4008
ccartledge@nd.gov

Census Bureau POC:

Dr. Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

AMERICAN OVERSIGHT

4. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement shall terminate six (6) years following the date on which it becomes effective. If, at the end of six (6) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, **in order to determine whether it should be revised, renewed or canceled.** The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Notwithstanding all other provisions of this agreement, the Parties agree that:

a. This agreement may be amended at any time by written mutual consent of both parties.

b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

The original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3. Terms and Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

5. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in

AMERICAN OVERSIGHT

order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

6. CONFIDENTIALITY

N.D.C.C. 44-04-18.19 and N.D.C.C. 50-06-15 protect the confidentiality of the state data, as well as:

- Medicaid, 42 U.S.C. § 1396(a)(a)(7), 42 CFR Part 431.300-307;
- Temporary Assistance to Needy Families, 42 U.S.C. § 602 (a)(1)(A)(iv);
- Supplemental Nutrition Assistance Program, 7 U.S.C. § 2020 (e)(8);
- 7 CFR Part 272.1(c);
- Social Security Act, 42 U.S.C. § 1396(a)(a)(7);
- Social Security Administration Disclosure, 20 CFR Part 401;
- Child Support, 42 U.S.C. § 654(26);
- Public Assistance Programs (Public Welfare), 45 CFR Part 205.50; and
- U.S. Department of Labor Employment and Training Administration, 20 CFR Part 603.

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the Chief Information Officer ("CIO"), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*." Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team ("US CERT"). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

AMERICAN OVERSIGHT

7. APPROVALS

M. Thieme 11/2/2016

Michael Thieme (Date)
Acting Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

Maggie D. Anderson 11/15/2016

Maggie D. Anderson (Date)
Executive Director
North Dakota Department of Human Services

AMERICAN OVERSIGHT

Attachment A: Data Elements

1. Data Requirements

Monthly data from the administration of SNAP and TANF for the years 2004—2021 will include, when available:

a. Case unit identifiers,
b. Complete monthly case unit address history (residence, mailing),
c. Benefit amounts received (monthly),
d. Income reporting requirement (simplified reporting, change reporting, etc.),
e. Gross income (monthly),
f. Net income (monthly),
g. Eligibility and denial information,
h. Identifiers for individuals in case units, and
i. The following information on individuals in a case unit:
    i. Name
    ii. Social Security Number
    iii. Case unit/main contact phone number
    iv. Relationship to primary recipient
    v. Race
    vi. Hispanic origin/Ethnicity
    vii. Sex
    viii. Date of birth
    ix. Education
    x. Employment
    xi. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)

AMERICAN OVERSIGHT

Attachment B: Description of Approved Research Projects

1. **Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records**

   The Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

   This project will focus on evaluating and improving the measurement of state programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

   This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. **Characterizing likely eligible non-participants of SNAP**

   Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. **Improve Census Bureau Record Linkage Methods**

   The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to

AMERICAN OVERSIGHT

each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

A. validating and enhancing the Master Address File (MAF);[1]
B. designing and assigning resources to carry out the 2020 Census;[2]
C. unduplicating public, private, and census lists; and
D. imputing missing data.[3]

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American

---

1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.
2 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.
3 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

AMERICAN OVERSIGHT

population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

AMERICAN OVERSIGHT

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE OREGON DEPARTMENT OF HUMAN SERVICES

Agreement No. 0094-FY17-NFE-0076

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Oregon Department of Human Services for the acquisition of Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF) data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.
The authority for the Oregon Department of Human Services to share SNAP data and enter into this agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C. § 2026. The Food and Nutrition Act of 2008 limits the use of SNAP recipient information to those directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture Food and Nutrition Service (FNS), through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the SNAP program because Census will provide to the state copies of its tabulations of the data for the state to use in administering its SNAP program.

The authority for the Oregon Department of Human Services to share TANF data and enter into this agreement is the Public Health and Welfare Act, 42 U.S.C. § 613.
Additional authority for the Oregon Department of Human Services to enter into this agreement is Oregon Revised Statute 411.116.

Additionally, under Oregon Revised Statute 411.320, as relevant to this agreement, the Oregon Department of Human Services may only use and disclose public assistance records, such as SNAP records, for purposes directly connected with the administration of the public assistance programs, or as necessary to assist public assistance applicants and recipients in accessing and receiving other governmental or private nonprofit services.

Disclosing data to the Census Bureau and receiving information from the Census Bureau will allow the Oregon Department of Human Services to identify specific geographical areas and populations that underutilize the SNAP program and to do outreach to these underserved groups. One of the goals of SNAP is to reach all families and individuals that may be eligible for benefits and break through barriers to those not currently receiving benefits but may be potentially eligible. Per the USDA Economic Research Service, in 2012, Oregon experienced a 13.6% food insecurity rate, meaning 13.6% of

AMERICAN OVERSIGHT

Oregonians experienced hunger at some point in the year. In addition, child hunger rates in Oregon are more alarming. According to a study completed by Feeding America, in conjunction with USDA food insecurity measurements, Oregon's child food insecurity for 2011 was 29.1%, meaning 29.1% of Oregon children experienced hunger at some point during the year. Obtaining tabulations through this agreement will help Oregon to continue to combat hunger, improving health and well-being of Oregonians. This data sharing agreement will assist the Oregon Department of Human Services in reaching underserved populations, continuing to battle hunger, maximizing nutrition education efforts and realizing potential federal fiscal benefits.

3. TERMS AND CONDITIONS

Pursuant to this agreement, the Oregon Department of Human Services, hereinafter referred to as "the state program agency" shall transfer records to the Census Bureau from the administration of SNAP and TANF, hereinafter referred to as "the state data" and as described in Attachment A of this agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act, 5 U.S.C. 552a. To the extent provided by law, only Census Bureau staff and Special Sworn Status ("SSS") researchers will have access to the data. Any data, records, or other information shared through this data sharing agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this agreement, it may not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

   i. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of SNAP and administration of TANF for the years 2015—2021, as described in Attachment A.

   ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, record length and data dictionary.

   iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers may not contain any state data or direct identifiers.

   iv. To allow the Census Bureau staff and SSS researchers to use the state data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

AMERICAN OVERSIGHT

b. The Census Bureau agrees:

i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.

ii. To provide the state program agency a table package based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American Community Survey (ACS). A table package shall include estimated rates of program eligibility and access/participation for the state overall and by various demographic, economic, and household characteristics and by county when the data allow. It also will include distributions across the same characteristics both for program participants and for those who are estimated to be eligible but do not participate. The table package will be delivered either within six (6) months from the date that the state administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.

iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to SNAP and TANF and resulting from use under this agreement of the state data. If no comments are received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this agreement.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the agreement to prevent unauthorized use.

Processing Sites: Bowie Computer Center
Suitland Federal Center
Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact ("POC") for the agreement on behalf of the state program agency and the Census Bureau, respectively:

AMERICAN OVERSIGHT

State program agency POC:

Maurice Walker
EBT Coordinator
Office of Self-Sufficiency Programs
500 Summer St NE E48, Salem, OR 97301
503-945-6075
maurice.walker@state.or.us

Census Bureau POC: Dr. Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement shall terminate six (6) years following the date on which it becomes effective. If, at the end of six (6) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, **in order to determine whether it should be revised, renewed or canceled.** The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Notwithstanding all other provisions of this agreement, the parties agree that:

a. This agreement may be amended at any time by written mutual consent of both parties.
b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

The original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3, Terms and Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in

AMERICAN OVERSIGHT

Attachment B will not be discontinued due to expiration or termination of this agreement.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

7. CONFIDENTIALITY

Oregon State Statute, ORS 411.320, protects the confidentiality of the state data, as well as:

- Medicaid, 42 U.S.C. § 1396(a)(a)(7), 42 CFR Part 431.300-307;
- Temporary Assistance to Needy Families, 42 U.S.C. § 602 (a)(1)(A)(iv);
- Supplemental Nutrition Assistance Program, 7 U.S.C. § 2020 (e)(8);
- 7 CFR Part 272.1(c);
- Social Security Act, 42 U.S.C. § 1396(a)(a)(7);
- Social Security Administration Disclosure, 20 CFR Part 401;
- Child Support, 42 U.S.C. § 654(26);
- Public Assistance Programs (Public Welfare), 45 CFR Part 205.50; and
- U.S. Department of Labor Employment and Training Administration, 20 CFR Part 603.

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the Chief Information Officer ("CIO"), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

AMERICAN OVERSIGHT

All information and information systems are categorized in accordance with NIST FIPS 199 *"Standards for Security Categorization of Federal Information and Information Systems"* and NIST Special Publication 800-60r1 *"Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices."* Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with Office of Management and Budget (OMB) Memorandum 6-19 and M-07-16. Known or suspected losses of protected data will be reported within one (1) hour to the United States Computer Emergency Readiness Team ("US CERT"). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

8. APPROVALS

M. Thieme 10/13/2016

Michael Thieme (Date)
Acting Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

Kim Fredlund 10/17/16

Kim Fredlund (Date)
Director, Self-Sufficiency Programs
Oregon Department of Human Services

AMERICAN OVERSIGHT

Attachment A: Data Elements

1. Data Requirements

Data from the administration of SNAP and TANF for the years 2015—2021 will include, when available:

a. Case unit identifiers,
b. Complete monthly case unit address history (residence, mailing),
c. Benefit amounts received (monthly),
d. Income reporting requirement (simplified reporting, change reporting, etc.),
e. Gross income (monthly),
f. Net income (monthly),
g. Eligibility and denial information,
h. Identifiers for individuals in case units, and
i. The following information on individuals in a case unit:
    i. Name
    ii. Social Security Number
    iii. Case unit/main contact phone number
    iv. Relationship to primary recipient
    v. Race
    vi. Hispanic origin/Ethnicity
    vii. Sex
    viii. Date of birth
    ix. Education
    x. Employment
    xi. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)

AMERICAN OVERSIGHT

Attachment B: Description of Approved Research Projects

1. **Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records**

   The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.
   This project will focus on evaluating and improving the measurement of state programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

   This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. **Characterizing likely eligible non-participants of SNAP**

   Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. **Improve Census Bureau Record Linkage Methods**

   The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

AMERICAN OVERSIGHT

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

A. validating and enhancing the Master Address File (MAF);[1]
B. designing and assigning resources to carry out the 2020 Census;[2]
C. unduplicating public, private, and census lists; and
D. imputing missing data.[3]

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

---

1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.
2 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.
3 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

AMERICAN OVERSIGHT

MEMORANDUM OF UNDERSTANDING THROUGH WHICH THE U.S. CENSUS BUREAU IS ACQUIRING ADMINISTRATIVE DATA FROM THE STATE OF MARYLAND FAMILY INVESTMENT ADMINISTRATION, DEPARTMENT OF HUMAN SERVICES

Agreement No. [2064-FY19-NFE-0304.000]

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the State of Maryland Family Investment Administration (FIA), Department of Human Services (DHS) for the acquisition of Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF) data contained in the Client Automated Resource and Eligibility System (CARES) and the Maryland WORKS system.

2. AUTHORITY

The authority for the Census Bureau to enter into this Agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the State of Maryland FIA DHS to share SNAP data and enter into this Agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026. The Food and Nutrition Act of 2008 limits the use of SNAP recipient information to those directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on October 24, 2017 has determined that the Census Bureau is directly connected with the administration of the SNAP program because Census will provide to the state copies of its research tabulations for the state to use in administering its SNAP program.

The authority for the State of Maryland FIA DHS to share TANF data and enter into this Agreement is consistent with Section 1137 of the Social Security Act and Section 205.50 of Title 45, Code of Federal Regulations.

Additional authority for the state program agency to enter into this agreement is Md. Code Ann., Human Services § 1-201, General Provisions Article, Section 4-202, *et seq.*, and COMAR 07.01.07.04 and COMAR.

3. TERMS AND CONDITIONS

Pursuant to this Agreement, the State of Maryland FIA DHS, hereinafter referred to as "the state program agency" shall transfer records to the Census Bureau from the CARES and Maryland WORKS system, hereinafter referred to as "the state data" and as described in Attachment A of this Agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the

AMERICAN OVERSIGHT

Privacy Act. To the extent provided by law, only Census Bureau staff and those Special Sworn Status (SSS) researchers participating in the projects will have access to the data. Access shall be limited to the minimum number of individuals necessary. Any data, records, or other information shared through this research Agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it may not be disclosed in individually-identifiable form that permits the identification of any individual respondents, businesses, organizations, or institutions, and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. To the extent provided by law, the Census Bureau will recognize the state program agency as the owner of the original data in the form that it is delivered to the Census Bureau, prior to its integration with confidential Census data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

   i. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of SNAP and administration of TANF for the years 2017—2024, as described in Attachment A.

   ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this Agreement; including definitions of active participants, a record layout, record count, record length and data dictionary.

   iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers may not contain any state data or direct identifiers.

   iv. To allow the Census Bureau staff and SSS researchers to use the state data at the Processing Sites listed in Section 4 of this Agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this Agreement.

b. The Census Bureau agrees:

   i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this Agreement and only for the projects listed in Attachment B or those approved in writing by both parties.

   ii. To provide the state program agency with a copy of data tabulations that the Census Bureau will create for Census research purposes. Specifically, the Census Bureau will provide the state program agency with data tabulations based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American Community Survey (ACS). Data tabulations shall include estimated rates of program eligibility and access/participation for the state

AMERICAN OVERSIGHT

overall and by various demographic, economic, and household characteristics and by county when the data allow. It also will include distributions across the same characteristics both for program participants and for those who are estimated to be eligible but do not participate. The data tabulations will be delivered either within six (6) months from the date that the state administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.

iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to SNAP and TANF and resulting from use under this Agreement of the state data. If no comments are received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this Agreement.

iv. As required by 5 U.S.C. § 2302(b)(13), any restriction with respect to disclosure by a Government employee must be consistent with, not supersede, nor conflict with, or otherwise alter the employee obligations, rights, or liabilities created by existing statute or Executive order relating to (1) classified information, (2) communications to Congress, (3) the reporting to an Inspector General of a violation of any law, rule, or regulation, or mismanagement, a gross waste of funds, an abuse of authority, or a substantial and specific danger to public health or safety, or (4) any other whistleblower protection. The definitions, requirements, obligations, rights, sanctions, and liabilities created by controlling Executive orders and statutory provisions are incorporated into this agreement and are controlling. This paragraph shall not be construed to authorize the withholding of information from Congress or the taking of any personnel action against an employee who discloses information to Congress.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this Agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the Agreement to prevent unauthorized use. The parties mutually agree that the following locations are designated for data processing, analysis, and storage within the Census Network:

Sites:
Bowie Computer Center or Other Approved Census Computer Centers
Suitland Federal Center
Federal Statistical Research Data Centers
Census Approved Cloud Services

AMERICAN OVERSIGHT

The parties mutually agree that the following named individuals will be designated as points of contact for the Agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency POC:

Augustin Ntabaganyimana, MPA
Deputy Executive Director for Operations
Family Investment Administration
Maryland Department of Human Services
311 West Saratoga Street
Baltimore, MD 21201
(410) 767-7571
augustin.ntabaganyimana@maryland.gov

Census Bureau POC: Michael Berning
Assistant Division Chief
Data Acquisition and Curation
Economic Reimbursable Surveys Division
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-2028
michael.a.berning@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This Agreement is effective on the date on which it is signed by both parties. The Agreement shall terminate six (6) years following the date on which it becomes effective. If, at the end of six (6) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this Agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the Agreement, **in order to determine whether it should be revised, renewed or canceled.** The review will be conducted by the Census Bureau's Assistant Director for Economic Programs and the state program agency.

Notwithstanding all other provisions of this Agreement, the Parties agree that:

a. This Agreement may be amended at any time by written mutual consent of both parties.

b. Either party may terminate this Agreement upon thirty (30) days written notice to the other party.

To the extent permitted by federal law, the original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two

AMERICAN OVERSIGHT

(2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3, Terms and Conditions. Any revisions to the data retention timetable after the execution of this Agreement will be stated in writing in an amendment to this Agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this Agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this Agreement.

To promote organizational transparency, and in support of data discovery for current and future research projects, the U.S. Census Bureau posts non-sensitive data documentation to public-facing websites. This documentation, such as a record layout or data dictionary, can include file descriptions, variable lists, variable labels and valid values for each variable.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this Agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this Agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this Agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

The Census Bureau will promptly consider and adjudicate, in accordance with Federal law, claims which may arise for damages of any nature arising out of a Census Bureau act under this Agreement. Such adjudication will be pursued under the Federal Tort Claims Act, 28 U.S.C. Section 2671 et seq., the Federal Employees Compensation Act, 5 U.S.C. Section 8101 et seq., or such other legal authority as may be pertinent. The U.S. Department of Justice shall determine the appropriate venues for any litigation arising under this Agreement.

7. CONFIDENTIALITY

A. IT Security

Md. Code Ann., Human Services § 1-201 protects the confidentiality of the state data, as well as:

- Medicaid, 42 U.S.C. § 1396(a)(a)(7), 42 CFR Part 431.300-307;

AMERICAN OVERSIGHT

- Temporary Assistance to Needy Families, 42 U.S.C. § 602 (a)(1)(A)(iv);
- Supplemental Nutrition Assistance Program, 7 U.S.C. § 2020 (e)(8);
- 7 CFR Part 272.1(c);
- Social Security Act, 42 U.S.C. § 1396(a)(a)(7);
- Social Security Administration Disclosure, 20 CFR Part 401;
- Child Support, 42 U.S.C. § 654(26);
- Public Assistance Programs (Public Welfare), 45 CFR Part 205.50; and
- U.S. Department of Labor Employment and Training Administration, 20 CFR Part 603.

The Census Bureau will comply with all federal laws applicable to the privacy or security of data received pursuant to this Agreement. As a federal agency, the Census Bureau is not subject to state laws, however the Census Bureau will comply with the requirements of applicable state laws to the extent that they do not conflict with the Census Bureau's requirements under federal law.

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, United States Code. The data provided under this Agreement are confidential under 13, U.S.C. § 9. Per the Federal Cybersecurity Enhancement Act of 2015, these data are also protected from cybersecurity risks through screening of the systems that transmit the data. Upon receipt, all data acquired as a result of this Agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with the Federal Information Security Modernization Act of 2014, Public Law 113-283. All systems are fully assessed against NIST Special Publication 800-53r4 "Recommended Security Controls for Federal Information Systems and Organizations," as well as Special Publication 800-37r2 "Risk Management Framework for Information Systems and Organizations: A System Life Cycle Approach for Security and Privacy." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO (Chief Information Officer), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices.*" Security controls and subsequent assessments are to be completed based on the final categorization.

Cloud providers must be approved for at least moderate level information through the GSA FedRAMP process prior to acquiring any services. Census Bureau identifies, assesses and authorizes use based on the published FedRAMP results and an assessment of any Census Bureau (customer provided) controls implemented to protect the infrastructure and data. Security reporting on cloud providers is reported to the Department of Commerce on a regular basis under FISMA.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum M-17-12. Known or suspected losses of protected data are to be reported within one (1) hour of its discovery to the Bureau of the Census Computer Incident Response Team (BOC

AMERICAN OVERSIGHT

CIRT) who will report as required to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau becomes aware of a known breach of the State Data, the Census Bureau will contact the state program agency contacts to discuss the actions and potential remedies regarding the incident.

B. Disclosure Avoidance Review of Statistical Products

Title 13, Section 9 of the United States Code (U.S.C.) requires the Census Bureau to keep confidential the information collected from the public under the authority of Title 13. Section 214 of Title 13, U.S.C., and Sections 3551, 3559 and 3571 of Title 18, U.S.C., provide for the imposition of penalties of up to five years in prison and/or up to $250,000.00 in fines for wrongful disclosure of confidential census information.

Disclosure avoidance is the process for protecting the confidentiality of data, as required under Title 13 U.S.C. A disclosure of data occurs when someone can use published statistical information to identify an individual who has provided confidential information under a pledge of confidentiality. For data tabulations, the Census Bureau uses disclosure avoidance procedures to modify or remove the characteristics that put confidential information at risk for disclosure. Although a published table may appear to show information about a specific individual, the Census Bureau has taken steps to disguise or suppress the original data, while making sure the results are still useful. The techniques used by the Census Bureau to protect confidentiality in tabulations vary, depending on the type of data.

Noise injection is the Census Bureau's preferred disclosure avoidance technique. By policy, noise injection is applied to all data products that are reported with geographies smaller than a state. In cases when it is not feasible to fully implement noise injection within the period of the contract, a transition plan for implementing noise injection or other provable privacy methods must be developed in coordination with the Census Bureau. Noise injection may be required for microdata releases, depending on the characteristics of the microdata and the specific variables that are to be released. Data that cannot be publicly released may still be analyzed within the Federal Statistical Research Data Centers (FSRDCs) by individuals who have Special Sworn Status; the results of such analyses must still go through a disclosure avoidance process prior to being publicly released.

The parties understand that Title 13 confidentiality protection and disclosure avoidance techniques apply to all work described in this Agreement. The disclosure avoidance disclosure methods are defined by the Census Bureau which has the responsibility of carrying out that work. Accordingly, upon completion of the tabulation, the data produced must be reviewed by the Census Bureau to ensure that no identifiable Title 13 data are or may be disclosed. Should the Census Bureau's Disclosure Review Board (DRB) determine that the requested statistical product does or reasonably could result in such disclosure, then the data product will be modified prior to approval for release to the party(ies) to this Agreement. The DRB must approve before a research product can be released to an individual who does not have SSS and a need to know, or moved to a computer not approved for controlled data according to Census' existing policies and procedures.

AMERICAN OVERSIGHT

8. APPROVALS

K Deardorff 9/12/19

Kevin Deardorff (Date)
Chief, Economic Reimbursable Surveys Division
U.S. Census Bureau

8/22/19

Netsanet Kibret (Date)
Executive Director, Family Investment Administration
Maryland Department of Human Services

AMERICAN OVERSIGHT

Attachment A: Data Elements

1. Data Requirements

Monthly data from the CARES for each program for the years 2017-2024, and from the Maryland WORKS system for each program for the years 2017—2024 will include, when available:

a. Case unit identifiers,
b. Active Participant definitions,
c. Complete monthly case unit address history (residence, mailing),
d. Monthly Benefits data (any of the available: benefits received date, benefits amount issued/received, and benefit amount redeemed),
e. Income reporting requirement (simplified reporting, change reporting, etc.),
f. Gross income (monthly),
g. Net income (monthly),
h. Eligibility and denial information,
i. Identifiers for individuals in case units, and
j. The following information on individuals in a case unit:
    i. Name
    ii. Last four (4) digits of the Social Security Number
    iii. Case unit/main contact phone number
    iv. Relationship to primary recipient
    v. Race
    vi. Hispanic origin/Ethnicity
    vii. Sex
    viii. Date of birth
    ix. Gross income (monthly)
    x. Net Income (monthly)
    xi. Monthly income source (earnings, TANF and general assistance)
    xii. Education
    xiii. Employment

AMERICAN OVERSIGHT

Attachment B: Description of Approved Research Projects

1. **Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records**

   The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

   This project will focus on evaluating and improving the measurement of state programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

   This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. **Characterizing likely eligible non-participants of SNAP**

   Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. **Improve Census Bureau Record Linkage Methods**

   The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative

AMERICAN OVERSIGHT

records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

A. validating and enhancing the Master Address File (MAF);[1]
B. designing and assigning resources to carry out the 2020 Census;[2]
C. unduplicating public, private, and census lists; and
D. imputing missing data.[3]

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical

---

1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.
2 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.
3 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

AMERICAN OVERSIGHT

purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

AMERICAN OVERSIGHT

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE OFFICE OF TEMPORARY AND DISABILITY ASSISTANCE OF THE STATE OF NEW YORK

Agreement No. [0094-FY16-NFE-0071]

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Office of Temporary and Disability Assistance, an agency of the State of New York (NYS OTDA), for the acquisition of data from the Supplemental Nutrition Assistance Program (SNAP) and Public Assistance programs (TANF).

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the New York Office of Temporary and Disability Assistance to share SNAP data and enter into this agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026. The Food and Nutrition Act of 2008 limits the use of SNAP recipient information to those directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the SNAP program because Census will provide to the state copies of its tabulations of the data for the state to use in administering its SNAP program.

The authority for the New York Office of Temporary and Disability Assistance to share TANF data from the Public Assistance programs and enter into this agreement is the Public Health and Welfare Act, 42 U.S.C. § 613.

3. TERMS AND CONDITIONS

Pursuant to this agreement, the New York Office of Temporary and Disability Assistance, hereinafter referred to as "the state program agency" shall transfer records to the Census Bureau from the administration of SNAP and Public Assistance programs, hereinafter referred to as "the state data" and as described in Attachment A of this agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and Special Sworn Status ("SSS") researchers will have

AMERICAN OVERSIGHT

access to the data. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it may not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

   i. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of SNAP and administration of Public Assistance programs for the years 2013—2020, as described in Attachment A.

   ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, record length and data dictionary.

   iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers may not contain any state data or direct identifiers.

   Research projects exploring whether the administrative records represent the same individuals in survey or census households may need access to name data. Access to name data will only be granted through approval by the Census Bureau Data Stewardship Executive Policy Committee. Researchers may not have access to Social Security Numbers.

   iv. To allow the Census Bureau staff and SSS researchers to use the state data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

   i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.

   ii. To provide the state program agency a table package based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American Community Survey (ACS). A table package shall include estimated rates

AMERICAN OVERSIGHT

of program eligibility and access/participation for the state overall and by various demographic, economic, and household characteristics and by county when the data allow. It also will include distributions across the same characteristics both for program participants and for those who are estimated to be eligible but do not participate. The table package will be delivered either within six (6) months from the date that the state administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.

iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to SNAP and Public Assistance programs and resulting from use under this agreement of the state data. If no comments are received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this agreement.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the agreement to prevent unauthorized use.

Processing Sites: Bowie Computer Center
Suitland Federal Center
Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency POC:

Dave Dlugolecki
New York State Office of Temporary and Disability Assistance
Bureau of Data Management and Analysis
40 North Pearl Street, 14A
Albany, NY 12243
(518) 474-1192
Dave.dlugolecki@otda.ny.gov

AMERICAN OVERSIGHT

Census Bureau POC: Dr. Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement shall terminate five (5) years following the date on which it becomes effective. If, at the end of five (5) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, **in order to determine whether it should be revised, renewed or canceled.** The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Notwithstanding all other provisions of this agreement, the Parties agree that:

a. This agreement may be amended at any time by written mutual consent of both parties.

b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

The original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3. Terms and Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

AMERICAN OVERSIGHT

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

7. CONFIDENTIALITY

New York statutes 18 NYCRR 357.2 and 387.2(j), and New York SSL section 136.2, protect the confidentiality of the state data, as well as:

- Medicaid, 42 U.S.C. § 1396(a)(a)(7), 42 CFR Part 431.300-307;
- Temporary Assistance to Needy Families, 42 U.S.C. § 602 (a)(1)(A)(iv);
- Supplemental Nutrition Assistance Program, 7 U.S.C. § 2020 (e)(8);
- 7 CFR Part 272.1(c);
- Social Security Act, 42 U.S.C. § 1396(a)(a)(7);
- Social Security Administration Disclosure, 20 CFR Part 401;
- Child Support, 42 U.S.C. § 654(26);
- Public Assistance Programs (Public Welfare), 45 CFR Part 205.50; and
- U.S. Department of Labor Employment and Training Administration, 20 CFR Part 603.

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the Chief Information Officer ("CIO"), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

AMERICAN OVERSIGHT

All information and information systems are categorized in accordance with NIST FIPS 199 *"Standards for Security Categorization of Federal Information and Information Systems"* and NIST Special Publication 800-60r1 *"Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices."* Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team ("US CERT"). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

8. APPROVALS

RJ 10/3/16

Ron Jarmin (Date)
Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

Sam Roberts 10/5/16

Samuel D. Roberts (Date)
Commissioner
New York State Office of Temporary and Disability Assistance

AMERICAN OVERSIGHT

Attachment A: Data Elements

1. Data Requirements

Data from the administration of SNAP and Public Assistance programs for the years 2013-2020 will include, when available:

a. Case unit identifiers,
b. Complete monthly case unit address history (residence or mailing, if residence is unavailable),
c. History of benefit amounts received (monthly),
d. Eligibility and most recent application date,
e. Unique identifiers for individuals in case units, and
f. The following information on individuals in a case unit:
    i. Name
    ii. Social Security Number
    iii. Sex
    iv. Date of birth
    v. Education (highest degree/highest grade level)
    vi. Monthly income source (TANF, general assistance)
    vii. History of membership in case unit (as provided/derived from monthly records)

AMERICAN OVERSIGHT

Attachment B: Description of Approved Research Projects

1. **Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records**

   The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

   This project will focus on evaluating and improving the measurement of state programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

   This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. **Characterizing likely eligible non-participants of SNAP**

   Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. **Improve Census Bureau Record Linkage Methods**

   The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to

AMERICAN OVERSIGHT

each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. **Research, Testing and Operations for the 2020 Census**

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

A. validating and enhancing the Master Address File (MAF);[1]
B. designing and assigning resources to carry out the 2020 Census;[2]
C. unduplicating public, private, and census lists; and
D. imputing missing data.[3]

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. **Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes**

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American

---

1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.
2 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.
3 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

AMERICAN OVERSIGHT

population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

AMERICAN OVERSIGHT

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE NEW JERSEY DEPARTMENT OF HUMAN SERVICES

Agreement No. 0094-2015-NFE-009

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau and the New Jersey Department of Human Services for the acquisition of Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF) data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the New Jersey Department of Human Services to share SNAP data and enter into this agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026 and N.J.A.C. 10:87-1.2. The Food and Nutrition Act of 2008 limits the use of SNAP recipient information to those parties directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture, Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the SNAP program because the Census Bureau will provide to the state copies of its tabulations of the data for the state to use in administering its SNAP program.

The authority for the New Jersey Department of Human Services to share TANF data and enter into this agreement is the Public Health and Welfare Act, 42 U.S.C. § 613 and N.J.S.A. 44:10-47.

The Census Bureau shall protect the individually identifiable health information provided under this agreement in accordance with 13 U.S.C. Section 9. Both parties agree that the terms of this MOU provide sufficient protection to allow the New Jersey Department of Human services to satisfy its requirements to protect data pursuant to the Health Insurance Portability and Accountability Act.

3. TERMS AND CONDITIONS

Pursuant to this agreement, the New Jersey Department of Human Services, hereinafter referred to as "the state program agency," shall transfer records to the Census Bureau from the administration of SNAP and TANF, hereinafter referred to as "the state data,"

AMERICAN OVERSIGHT

and as described in Attachment A of this agreement. All data that the state program agency agrees to provide the Census Bureau shall remain confidential. Maintaining confidentiality of these data is also guaranteed under Title 13 U.S.C, Section 9, and the Privacy Act of 1974. Only Census Bureau staff and Special Sworn Status ("SSS") researchers will have access to the data. Any data, records, or other information shared through this research agreement shall be protected from unauthorized disclosure and shall be used solely for statistical purposes. When the Census Bureau publicly releases information related to this research, it shall not be disclosed in individually-identifiable form, and results will meet the Census Bureau disclosure avoidance guidelines. The Census Bureau shall link the state data to census data, survey data and administrative records data. The Census Bureau shall use the linked data for research and operations to improve data collection, and record linkage methods for surveys and decennial censuses. The Census Bureau shall also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

a. The state program agency agrees:

   i. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) or appropriately encrypted CD-ROM or DVD-ROM, data from the State's database for the years 2004—2020, or available years, as described in Attachment A.

   ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement, including a record layout, record count, record length and data dictionary.

   iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers may not contain any state data or direct identifiers.

   Research projects exploring whether the administrative records represent the same individuals in survey or census households may need access to name data. Access to name data will only be granted through approval by the federal Census Bureau Data Stewardship Executive Policy Committee. Researchers shall not have access to Social Security Numbers.

AMERICAN OVERSIGHT

iv. To allow the Census Bureau staff and SSS researchers to use the state data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B, and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

i. To grant access to the state data only to the Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement, and only for the projects listed in Attachment B or those approved in writing by both parties.

ii. To provide the state program agency, within six (6) months of the time the data is processed and provided to the Census Bureau research staff, selected tabulations of the state data linked to the American Community Survey. These tabulations shall describe the demographic and household characteristics of residents who are likely to be eligible for SNAP, but who do not participate in the program.

iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments, clearance, or rejection of pre-publication copies of any report or other document containing information derived from the state program agency data pertaining to SNAP and TANF and resulting from use under this agreement of the state data. If no response is received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no response is received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have approved the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this agreement.

4. CONTACTS

The parties mutually agree that the following named individual is to be designated as custodian of the files on behalf of the Census Bureau and shall be personally responsible for the observance of all conditions of use, and for the establishment and maintenance of security arrangements to prevent unauthorized use as specified in the agreement. The Census Bureau agrees to notify the state program agency within fifteen (15) days of any changes of custodianship.

Custodian:

J. Trent Alexander
Data Custodian
U.S. Census Bureau
4600 Silver Hill Road, 2K133
Washington DC 20233
(301) 763-9810
j.trent.alexander@census.gov

AMERICAN OVERSIGHT

Processing Sites: Bowie Computer Center
Suitland Federal Center
Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the state program agency and the Census Bureau, respectively:

State of New Jersey program agency POC:
Natasha Johnson
Director
NJ Department of Human Services
Division of Family Development
P.O. Box 716
Trenton, NJ 08625
(609) 588-2402
Natasha.Johnson@dhs.state.nj.us

Census Bureau POC: Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement shall terminate five (5) years following the date on which it becomes effective. If at the end of five (5) years the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this agreement at least once every three (3) years, or whenever a Federal or State statute is enacted that materially affects the substance of the agreement, **in order to determine whether it should be revised, renewed or canceled.** The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Notwithstanding all other provisions of this agreement, the Parties agree that:

a. This agreement may be amended at any time by written mutual consent of both parties.

AMERICAN OVERSIGHT

b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

The original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3. Terms and Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data, as part of the projects described in Attachment B, will not be discontinued due to expiration or termination of this agreement.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

7. CONFIDENTIALITY

State Statutes or Acts protect the confidentiality of the state data, as well as:

- Temporary Assistance to Needy Families, 42 U.S.C. § 602 (a)(1)(A)(iv);
- Supplemental Nutrition Assistance Program, 7 U.S.C. § 2020 (e)(8);
- 7 CFR Part 272.1(c);
- Social Security Act, 42 U.S.C. § 1396(a)(a)(7);
- Social Security Administration Disclosure, 20 CFR Part 401;
- Public Assistance Programs (Public Welfare), 45 CFR Part 205.50; and
- Public Welfare, Security and Privacy, Uses and Disclosures, 45 CFR 164.504 (e)(3)

The Census Bureau assumes an obligation to safeguard all data received from other federal and state agencies and commercial entities pursuant to federal and State laws and regulations, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60.

The Census Bureau agrees to remain compliant with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347).

AMERICAN OVERSIGHT

All systems shall be fully assessed against NIST Special Publication 800-53r3 *"Recommended Security Controls for Federal Information Systems and Organizations,"* as well as Special Publication 800-37r1 *"Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach."* The Census Bureau IT Security Program shall be reviewed annually by the {Department of Commerce, Office of the Chief Information Officer ("CIO")}, as well as the {Department of Commerce, Office of Inspector General}, as part of the oversight responsibilities.

All information and information systems shall be categorized in accordance with NIST FIPS 199 *"Standards for Security Categorization of Federal Information and Information Systems"* and NIST Special Publication 800-60 *"Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices."* Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau shall maintain a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team ("US CERT"). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

8. APPROVALS

Tommy Wright for 8/18/2015

Ron Jarmin (Date)
Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

10/1/15

Elizabeth Connolly (Date)
Commissioner
NJ Department of Human Services

AMERICAN OVERSIGHT

Attachment A: Data Elements

1. Data Requirements

Data from the administration of SNAP and TANF for the years 2004—2020 will include, when available:

a. Case unit identifiers,
b. Complete monthly case unit address history (residence, mailing),
c. History of benefit amounts received (monthly),
d. Income reporting requirement (simplified reporting, change reporting, etc.),
e. Gross income (monthly),
f. Net income (monthly),
g. Eligibility and denial information,
h. Identifiers for individuals in case units, and
i. The following information on individuals in a case unit:
    i. Name
    ii. Social Security Number
    iii. Relationship to primary recipient
    iv. Race
    v. Hispanic origin/Ethnicity
    vi. Sex
    vii. Date of birth
    viii. Education
    ix. Employment
    x. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)
    xi. History of membership in case unit

AMERICAN OVERSIGHT

Attachment B: Description of Approved Research Projects

1. **Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records**

   The U.S. Census Bureau administers multiple household surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

   This project will focus on evaluating and improving the measurement of state programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

   This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. **Characterizing likely eligible non-participants of SNAP**

   Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. **Improve Census Bureau Record Linkage Methods**

   The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to

AMERICAN OVERSIGHT

each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research and Planning for the 2020 Census

The Census Bureau intends to test and potentially use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau intends to use state program information, along with data from federal, state, and private sources, to pursue the following four research initiatives, leading to improvements in quality and efficiency of 2020 Census operations:

A. validating and enhancing the Master Address File (MAF);[1]
B. designing and assigning resources to carry out the 2020 Census;[2]
C. unduplicating public, private, and census lists; and
D. imputing missing data.[3]

Data quality will be explored using 2010 decennial census data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches, such as modeling or business rules, to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography, including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census to assess accuracy based on the level of aggregation.

1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.
2 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.
3 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

AMERICAN OVERSIGHT

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE MICHIGAN DEPARTMENT OF HEALTH AND HUMAN SERVICES

Agreement No. 0094-FY17-NFE-0085

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Michigan Department of Health and Human Services (MDHHS) for the acquisition of Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF) data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the MDHHS to share SNAP data and enter into this agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026. The Food and Nutrition Act of 2008 limits the use of SNAP recipient information to those directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the SNAP program because Census will provide to the state copies of its tabulations of the data for the state to use in administering its SNAP program.

The authority for the MDHHS to share TANF data and enter into this agreement is the Public Health and Welfare Act, 42 U.S.C. § 613.

3. TERMS AND CONDITIONS

Pursuant to this agreement, the MDHHS, hereinafter referred to as "the state program agency" will transfer records to the Census Bureau from the administration of SNAP, TANF, and WIC hereinafter referred to as "the state data" and as described in Attachment A of this agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and Special Sworn Status ("SSS") researchers will have access to the data. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information

AMERICAN OVERSIGHT

related to this research, it will not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

   i. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of SNAP and administration of TANF for the years 2010—2021, as described in Attachment A.

   ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, record length and data dictionary.

   iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers may not contain any state data or direct identifiers.

   iv. To allow the Census Bureau staff and SSS researchers to use the state data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

   i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.

   ii. To provide the state program agency a table package based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American Community Survey (ACS). A table package shall include estimated rates of program eligibility and access/participation for the state overall and by various demographic, economic, and household characteristics and by county when the data allow. It also will include distributions across the same characteristics both for program participants and for those who are estimated to be eligible but do not participate. The table package will be delivered either within six (6) months from the date that the state administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.

AMERICAN OVERSIGHT

iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to SNAP and TANF and resulting from use under this agreement of the state data. If no comments are received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this agreement.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the agreement to prevent unauthorized use.

Processing Sites: Bowie Computer Center
Suitland Federal Center
Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency POC: SNAP/TANF

George Noonan
Manager, Data Strategy Group
Department of Health and Human Services
235 S. Grand Avenue
Lansing, MI 48909
517 335-7756
noonang@michigan.gov

Census Bureau POC: Dr. Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

AMERICAN OVERSIGHT

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement shall terminate six (6) years following the date on which it becomes effective. If, at the end of six (6) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, **in order to determine whether it should be revised, renewed or canceled.** The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Notwithstanding all other provisions of this agreement, the Parties agree that:

a. This agreement may be amended at any time by written mutual consent of both parties.

b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

The original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3. Terms and Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of

AMERICAN OVERSIGHT

Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

7. CONFIDENTIALITY

Michigan Public Act 280, Section 400.11c protects the confidentiality of the state data, as well as:

- Medicaid, 42 U.S.C. § 1396(a)(a)(7), 42 CFR Part 431.300-307;
- Temporary Assistance to Needy Families, 42 U.S.C. § 602 (a)(1)(A)(iv);
- Supplemental Nutrition Assistance Program, 7 U.S.C. § 2020 (e)(8);
- 7 CFR Part 272.1(c);
- Social Security Act, 42 U.S.C. § 1396(a)(a)(7);
- Social Security Administration Disclosure, 20 CFR Part 401;
- Child Support, 42 U.S.C. § 654(26);
- Public Assistance Programs (Public Welfare), 45 CFR Part 205.50; and
- U.S. Department of Labor Employment and Training Administration, 20 CFR Part 603.

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 *"Recommended Security Controls for Federal Information Systems and Organizations,"* as well as Special Publication 800-37r1 *"Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach."* The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the Chief Information Officer ("CIO"), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 *"Standards for Security Categorization of Federal Information and Information Systems"* and NIST Special Publication 800-60r1 *"Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices."* Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United

AMERICAN OVERSIGHT

States Computer Emergency Readiness Team ("US CERT"). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

8. APPROVALS

11/28/2016

Michael Thieme (Date)
Acting Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

11/28/2016

Laurie Johnson (Date)
Director, Support Services, Business Integration Center
Michigan Department of Health & Human Services

AMERICAN OVERSIGHT

Attachment A: Data Elements

1. Data Requirements

Monthly data from the administration of SNAP and TANF for the years 2010—2021 will include, when available:

a. Case unit identifiers,
b. Complete monthly case unit address history (residence, mailing),
c. Benefit amounts received (monthly),
d. Income reporting requirement (simplified reporting, change reporting, etc.),
e. Gross income (monthly),
f. Net income (monthly),
g. Eligibility and denial information,
h. Identifiers for individuals in case units, and
i. The following information on individuals in a case unit:
    i. Name
    ii. Social Security Number
    iii. Case unit/main contact phone number
    iv. Relationship to primary recipient
    v. Race
    vi. Hispanic origin/Ethnicity
    vii. Sex
    viii. Date of birth
    ix. Education
    x. Employment
    xi. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)

AMERICAN OVERSIGHT

Attachment B: Description of Approved Research Projects

1. **Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records**

   The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

   This project will focus on evaluating and improving the measurement of state programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

   This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. **Characterizing likely eligible non-participants of SNAP**

   Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. **Improve Census Bureau Record Linkage Methods**

   The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to

AMERICAN OVERSIGHT

each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

A. validating and enhancing the Master Address File (MAF);[1]
B. designing and assigning resources to carry out the 2020 Census;[2]
C. unduplicating public, private, and census lists; and
D. imputing missing data.[3]

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American

---

1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.
2 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.
3 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

AMERICAN OVERSIGHT

population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

AMERICAN OVERSIGHT

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
WOMEN, INFANTS, AND CHILDREN ADMINISTRATIVE DATA
FROM
THE MICHIGAN DEPARTMENT OF HEALTH AND HUMAN SERVICES

Agreement No. 0094-FY17-NFE-0088

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Michigan Department of Health and Human Services (MDHHS) for the acquisition of Women, Infants, and Children (WIC) Administrative Data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the MDHHS to share WIC data and enter into this agreement is Section 17 of the Child Nutrition Act of 1966, 42 U.S.C. § 1786 and implementing regulations at 7 CFR Part 246. WIC regulations at 7 CFR 246.26(d)(1)(ii) limit the disclosure of WIC recipient information to those directly connected with the administration or enforcement of the WIC program. The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the WIC program because Census will provide to the state copies of its tabulations of the data for the state to use in administering its WIC program.

3. TERMS AND CONDITIONS

Pursuant to this agreement, the MDHHS WIC Program hereinafter referred to as "the state program agency", will transfer records to the Census Bureau from the administration of WIC, hereinafter referred to as "the state data" and as described in Attachment A of this agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and Special Sworn Status ("SSS") researchers will have access to the data. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it will not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey

AMERICAN OVERSIGHT

data and administrative records data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

   i. To transfer to the Census Bureau via secure FTP (File Transfer Protocol) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of WIC for the years 2010—2021, as described in Attachment A.

   ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, and record length.

   iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers will not contain any state data or direct identifiers.

   Research projects exploring whether the administrative records represent the same individuals in survey or census households may need access to name data. Access to name data will only be granted through approval by the Census Bureau Data Stewardship Executive Policy Committee. Researchers will not have access to Social Security Numbers.

   iv. To allow the Census Bureau staff and Special Sworn Status (SSS) researchers to use the state data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

   i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.

   ii. To provide the state program agency a table package based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American Community Survey (ACS). A table package shall include estimated rates of program eligibility and access/participation for the state overall and by various demographic, economic, and household characteristics and by county when the data allow. It also will include distributions across the same characteristics both for program participants and for those who are estimated to be eligible but do not participate. The table package will be delivered either within six (6) months from the date that the state administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.

AMERICAN OVERSIGHT

iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to WIC and resulting from use under this agreement of the state data. If no comments are received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this agreement.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the agreement to prevent unauthorized use.

Processing Sites: Bowie Computer Center
Suitland Federal Center
Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency POC:
Dr. Kobra Eghtedary
Director of Data, Research & Technology
Michigan WIC Program
320 S. Walnut St., Lansing, MI - 48913
(517) 335-9834
EghtedaryK@Michigan.Gov

Census Bureau POC: Dr. Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

AMERICAN OVERSIGHT

This agreement is effective on the date on which it is signed by both parties. The agreement will terminate six (6) years following the date on which it becomes effective. If, at the end of six (6) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties will review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, **in order to determine whether it should be revised, renewed or canceled.** The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Notwithstanding all other provisions of this agreement, the Parties agree that:

a. This agreement may be amended at any time by written mutual consent of both parties.

b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

The original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3. Terms and Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

AMERICAN OVERSIGHT

7. CONFIDENTIALITY

Michigan State HIPAA Privacy protects the confidentiality of the state data, as well as WIC regulations at 7 CFR 246.26(e). The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO (Chief Information Officer), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*." Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

AMERICAN OVERSIGHT

8. APPROVALS

12/22/2016

Dr. John Eltinge (Date)
Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

1-19-17

Dr. Kobra Eghtedary (Date)
Director of Data, Research and Technology
MDHHS / Michigan WIC Program

AMERICAN OVERSIGHT

Attachment A: Data Elements

1. Data Requirements

Monthly data from the administration of WIC for the years 2010—2021 will include, when available:

a. Case unit identifiers,
b. Complete monthly case unit address history (residence, mailing),
c. Benefit Start and End Dates
d. Income reporting requirement (simplified reporting, change reporting, etc.),
e. Gross income (monthly)
f. Identifiers for individuals in case units, and
g. The following information on individuals in a case unit:
    i. Name
    ii. Case unit/main contact phone number
    iii. Recipient or Caretaker phone number
    iv. Race
    v. Hispanic origin/Ethnicity
    vi. Sex
    vii. Date of birth
    viii. Education
    ix. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)

AMERICAN OVERSIGHT

Attachment B: Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records

The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of state programs in the American Community Survey (ACS), the Current Population Survey (CPS) and the Survey of Income and Program Participation (SIPP). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing WIC participants and likely eligible non-participants of WIC

WIC data linked to ACS data can provide characteristic information for women, infants, and children participating in the WIC program. Additionally, infants and children with a high probability of being eligible for WIC can be estimated using ACS information on family structure, reported income, and public assistance.[1] The estimated eligible infants and children can be matched to the administrative WIC data to determine who is estimated to be eligible but not participating in the program, helping agencies determine unmet need. The project results can help state agencies improve outreach efforts. This research helps the Census Bureau better understand their survey and census data.

3. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System (PVS) uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records. However, coverage for

1 Eligible pregnant and breastfeeding women cannot be identified in ACS data.

AMERICAN OVERSIGHT

some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

A. validating and enhancing the Master Address File (MAF);[2]
B. designing and assigning resources to carry out the 2020 Census;[3]
C. unduplicating public, private, and census lists; and
D. imputing missing data.[4]

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American population and economy. As Census and other Federal Statistical Agencies successfully

2 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.
3 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.
4 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

AMERICAN OVERSIGHT

integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

AMERICAN OVERSIGHT

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE NEBRASKA DEPARTMENT OF MOTOR VEHICLES

Agreement No. [#2064-FY20-NFE-0315.000]

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Nebraska Department of Motor Vehicles for the acquisition of Driver License Administrative Data, of which data may include: Driver Licenses, Identification Cards, and Junior Driver Licenses.

2. AUTHORITY

The authority for the Census Bureau to enter into this Agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the Nebraska Department of Motor Vehicles to enter into this Agreement is the Uniform Motor Vehicle Records Disclosure Act, hereinafter "the UMVRDA," found at Neb. Rev. Stat. §§ 60-2901, *et seq*. The specific authorizing statute for the release of Driver License Administrative Data is found at Neb. Rev. Stat. § 60-2907(1): "For use by any federal, state, or local government agency, including any court or law enforcement agency, in carrying out the agency's functions or by a private person or entity acting on behalf of a governmental agency in carrying out the agency's functions." The Census Bureau agrees to use the information from Driver License Administrative Data only for the purposes of carrying out its functions. This authority permits the release of basic driver license records to agencies of the Federal government. The Federal Driver's Privacy Protection Act, 18 U.S.C. §2721-2725 permits states to disclose driver license information to any government agency carrying out its functions.

3. TERMS AND CONDITIONS

Pursuant to this Agreement, the Nebraska Department of Motor Vehicles, hereinafter referred to as "the state program agency" shall transfer records to the Census Bureau from the administration of driver licensing and identification card issuance, hereinafter referred to as "the state data" and as described in Attachment A of this Agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, the UMVRDA, and the Privacy Act. To the extent provided by law, only Census Bureau staff and those Special Sworn Status (SSS) researchers participating in the projects will have access to the data. Access shall be limited to the minimum number of individuals necessary. Any data, records, or other information shared through this research Agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it may not

AMERICAN OVERSIGHT

be disclosed in individually-identifiable form that permits the identification of any individual respondents, businesses, organizations, or institutions, and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. To the extent provided by law, the Census Bureau will recognize the state program agency as the owner of the original data in the form that it is delivered to the Census Bureau, prior to its integration with confidential Census data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics and estimates.

a. The state program agency agrees:

   i. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) or appropriately encrypted CD-ROM or DVD-ROM, data from Nebraska Department of Motor Vehicles for Drivers License and Identification Card administrative records for December 2019 – December 2021, as described in Attachment A. An initial delivery of monthly data will occur before December 31, 2019. The remaining deliveries can follow on a monthly or annual basis, including a delivery of data vintage (April 1, 2020) on or before June 30, 2020.

   ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this Agreement; including definitions of variables/data dictionary, a record layout, record count, and record length.

   iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers may not contain any state data or direct identifiers.

   iv. To allow the Census Bureau staff and SSS researchers to use the state data at the Processing Sites listed in Section 4 of this Agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this Agreement.

b. The Census Bureau agrees:

   i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this Agreement and only for the projects listed in Attachment B or those approved in writing by both parties. Census bureau may not release, disclose, use, resell, or otherwise share data unless expressly authorized by law.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this Agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the Agreement to prevent unauthorized use. The parties mutually agree

AMERICAN OVERSIGHT

that the following locations are designated for data processing, analysis, and storage within the Census Network:

Sites: Bowie Computer Center or Other Approved Census Computer Centers
Suitland Federal Center
Federal Statistical Research Data Centers
Census Approved Cloud Services

The parties mutually agree that the following named individuals will be designated as points of contact for the Agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency POC:

Kenneth Lackey
Agency Legal Counsel
Nebraska Department of Motor Vehicles
P.O. Box 94699, Lincoln, NE 68509
(402) 471-9593
kenneth.lackey@nebraska.gov

Census Bureau POC: Michael Berning
Assistant Division Chief
Data Acquisition and Curation
Economic Reimbursable Surveys Division
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-2028
michael.a.berning@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This Agreement is effective on the date on which it is signed by both parties. The Agreement shall terminate December 31, 2021. If, at the end of the term, the parties wish to continue the relationship, they must execute a new agreement.

The parties may review this Agreement every year, or whenever a Federal statute or Nebraska law is enacted that materially affects the substance of the Agreement, **in order to determine whether it should be revised, renewed or canceled.** The review will be conducted by the Census Bureau's Assistant Director for Economic Programs and the state program agency.

Notwithstanding all other provisions of this Agreement, the Parties agree that:

a. This Agreement may be amended at any time by written mutual consent of both parties.

AMERICAN OVERSIGHT

b. Either party may terminate this Agreement upon thirty (30) days written notice to the other party.

c. Either party may terminate this Agreement immediately upon the discovery that the other party has violated a term of this Agreement or relevant law.

To the extent permitted by federal law, the original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3, Terms and Conditions. Any revisions to the data retention timetable after the execution of this Agreement will be stated in writing in an amendment to this Agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this Agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this Agreement.

To promote organizational transparency, and in support of data discovery for current and future research projects, the U.S. Census Bureau posts non-sensitive data documentation to public-facing websites. This documentation, such as a record layout or data dictionary, can include file descriptions, variable lists, variable labels and valid values for each variable.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this Agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher official of each agency for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this Agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this Agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

The Census Bureau will promptly consider and participate in adjudication of, in accordance with Federal law, claims which may arise for damages of any nature arising out of a Census Bureau act under this Agreement. Such adjudication will be pursued under the Federal Tort Claims Act, 28 U.S.C. Section 2671 et seq., the Federal Employees Compensation Act, 5 U.S.C. Section 8101 et seq., or such other legal authority as may be pertinent.

AMERICAN OVERSIGHT

7. CONFIDENTIALITY

A. IT Security

The UMVRDA protects the confidentiality of the state data.

The Census Bureau will comply with all federal laws applicable to the privacy or security of data received pursuant to this Agreement. As a federal agency, the Census Bureau is not subject to state laws, however the Census Bureau will comply with the requirements of applicable state laws, including the UMVRDA, to the extent that they do not conflict with the Census Bureau's requirements under federal law.

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, United States Code. The data provided under this Agreement are confidential under 13, U.S.C. § 9. Per the Federal Cybersecurity Enhancement Act of 2015, these data are also protected from cybersecurity risks through screening of the systems that transmit the data. Upon receipt, all data acquired as a result of this Agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with the Federal Information Security Modernization Act of 2014, Public Law 113-283. All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r2 "*Risk Management Framework for Information Systems and Organizations: A System Life Cycle Approach for Security and Privacy*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO (Chief Information Officer), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*." Security controls and subsequent assessments are to be completed based on the final categorization.

Cloud providers must be approved for at least moderate level information through the GSA FedRAMP process prior to acquiring any services. Census Bureau identifies, assesses and authorizes use based on the published FedRAMP results and an assessment of any Census Bureau (customer provided) controls implemented to protect the infrastructure and data. Security reporting on cloud providers is reported to the Department of Commerce on a regular basis under FISMA.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum M-17-12. Known or suspected losses of protected data are to be reported within one (1) hour of its

AMERICAN OVERSIGHT

discovery to the Bureau of the Census Computer Incident Response Team (BOC CIRT) who will report as required to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau becomes aware of a known breach of the State Data, the Census Bureau will contact the state program agency contacts to discuss the actions and potential remedies regarding the incident.

B. Disclosure Avoidance Review of Statistical Products

Title 13, Section 9 of the United States Code (U.S.C.) requires the Census Bureau to keep confidential the information collected from the public under the authority of Title 13. Section 214 of Title 13, U.S.C., and Sections 3551, 3559 and 3571 of Title 18, U.S.C., provide for the imposition of penalties of up to five years in prison and/or up to $250,000.00 in fines for wrongful disclosure of confidential census information.

Disclosure avoidance is the process for protecting the confidentiality of data, as required under Title 13 U.S.C. A disclosure of data occurs when someone can use published statistical information to identify an individual who has provided confidential information. For data tabulations, the Census Bureau uses disclosure avoidance procedures to modify or remove the characteristics that put confidential information at risk for disclosure. Although a published table may appear to show information about a specific individual, the Census Bureau has taken steps to disguise or suppress the original data, while making sure the results are still useful. The techniques used by the Census Bureau to protect confidentiality in tabulations vary, depending on the type of data.

Noise injection is the Census Bureau's preferred disclosure avoidance technique. By policy, noise injection is applied to all data products that are reported with geographies smaller than a state. In cases when it is not feasible to fully implement noise injection within the period of the contract, a transition plan for implementing noise injection or other provable privacy methods must be developed in coordination with the Census Bureau. Noise injection may be required for microdata releases, depending on the characteristics of the microdata and the specific variables that are to be released. Data that cannot be publicly released may still be analyzed within the Federal Statistical Research Data Centers (FSRDCs) by individuals who have Special Sworn Status (SSS); the results of such analyses must still go through a disclosure avoidance process prior to being publicly released.

The parties understand that Title 13 confidentiality protection and disclosure avoidance techniques apply to all work described in this Agreement. The disclosure avoidance disclosure methods are defined by the Census Bureau, which has the responsibility of carrying out that work. Accordingly, upon completion of the tabulation, the data produced must be reviewed by the Census Bureau to ensure that no identifiable Title 13 data are or may be disclosed. Should the Census Bureau's Disclosure Review Board (DRB) determine that the requested statistical product does or reasonably could result in such disclosure, then the data product will be modified prior to approval for release to the party(ies) of this Agreement. The DRB must approve before a research product can be released to an individual who does not have SSS and a need to know, or moved to a computer not approved for controlled data according to Census' existing policies and procedures.

AMERICAN OVERSIGHT

8. APPROVALS

11/7/19

Kevin Deardorff (Date)
Chief, Economic Reimbursable Surveys Division
U.S. Census Bureau

Rhonda K Lahm 4 November 2019

Rhonda K. Lahm (Date)
Director
Nebraska Department of Motor Vehicles

AMERICAN OVERSIGHT

Attachment A: Data Elements

1. Data Requirements

Monthly data from the administration of Drivers Licensing and Identification Card Issuance for December 2019 – December 2021, will include, when available:

a. Driver License Number or Identification Number
b. Type of card
c. Name
d. Address
e. Date of Birth
f. Sex
g. Race
h. Eye Color
i. Citizenship status
j. Date Issued

AMERICAN OVERSIGHT

Attachment B: Description of Approved Research Projects

1. **Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records**

   The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

   This project will focus on evaluating and improving the measurement of state programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

   This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. **Improve Census Bureau Record Linkage Methods**

   The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

3. **Research, Testing and Operations for the 2020 Census**

   The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to

AMERICAN OVERSIGHT

pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

A. validating and enhancing the Master Address File (MAF);[1]
B. designing and assigning resources to carry out the 2020 Census;[2]
C. unduplicating public, private, and census lists; and
D. imputing missing data.[3]

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

4. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

---

1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.
2 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.
3 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

AMERICAN OVERSIGHT

5. Project to Use Administrative Records Data to Support Executive Order 13880

The Census Bureau plans to use several administrative data sources of citizenship status in a statistical model that will produce a probability of being a U.S. citizen on April 1, 2020 for each person in the 2020 Census. The citizenship probability will be used together with age, race, ethnicity, and location information from the 2020 Census to produce Citizen Voting Age Population (CVAP) statistics. The objective of the project is to determine the number of citizens and non-citizens in the country.

Person records in each administrative and survey data source, including the 2020 Census, will be validated and assigned a unique person identifier, called a Protected Identification Key (PIK). The PIKs will be used to link each person's citizenship information to their 2020 Census record. The citizenship probability for persons in the 2020 Census without PIKs will be estimated based on local area information and the person's demographic characteristics, but not the person's citizenship, which makes the estimate much less accurate than if the person's citizenship information were available. The validation process (called the Person Identification Validation System (PVS)) involves comparing records to high-quality federal government sources (called reference files) using fields such as Social Security Number (SSN), name, date of birth, sex, and residential address. Currently the reference files are limited to the Social Security Administration's (SSA's) Numident file and the Internal Revenue Service's (IRS's) Individual Taxpayer Identification Number (ITIN) file. Several million U.S. residents have neither an SSN nor an ITIN, however. Thus, even if such a person's information in an administrative or survey source is accurate, it will not be found in the reference files, no PIK will be assigned, and the person's citizenship probability will be estimated without the benefit of information about her/his citizenship status. Just because a person doesn't have a PIK does not necessarily mean the person doesn't have an SSN or ITIN, however. Records often contain errors in personally identifiable information (PII), missing information, or variants not seen in the reference files (e.g., a name or address change), leading to a failure to validate. Thus, imposing an assumption that all persons without PIKs are not U.S. citizens would lead to a significant underestimate of the number of citizens.

Once citizenship data sources and the 2020 Census person file have been assigned PIKs, the citizenship data will be linked to the 2020 Census person file. A model will be estimated for each person with a PIK, using the most current citizenship status from each available citizenship source for the person, as well as the person's other demographic, household, and location information as explanatory variables. The model will produce a citizenship probability for each person, which will then be combined with age, race, ethnicity, and location information from the 2020 Census to produce the Citizen Voting Age Population (CVAP) statistics.

Having more than one source of citizenship information is necessary, because no one source is complete and up-to-date. The SSA Numident contains citizenship status for most of the population. But the information is not always up-to-date for foreign-born persons. Prior to the 1970's people were not required to provide evidence of citizenship status when applying for an SSN. Thus, the citizenship status is blank for many older people in the Numident. Also, naturalized citizens are not required to notify SSA about their

AMERICAN OVERSIGHT

naturalization. Thus, a naturalized citizen's SSA record may incorrectly say the person is not a citizen.

Having information about not only whether a person is a U.S. citizen or not at a point in time, but also their country of origin, visa status, and how long they have been in that status, could help predict naturalization at a later date, because naturalization rates vary across countries of origin, visa statuses, and lengths of time in status. This would be useful for estimating the current citizenship status for persons with citizenship information sometime in the past, but who lack current information.

Prior to producing citizenship statistics in the fall/winter of 2020-2021, the Census Bureau will do extensive testing of the citizenship models. Researchers will use past censuses and the American Community Survey (ACS) as person frames (in place of the 2020 Census), together with citizenship information from administrative sources in the same time periods. The testing will require historical data.

The administrative records data will both expand the coverage of persons with citizenship information in the 2020 Census and provide more up-to-date citizenship information for those already covered by other sources, resulting in more accurate statistics about the U.S. citizen population.

AMERICAN OVERSIGHT

DocuSign Envelope ID: 53144DF4-19BF-4A52-8707-B4E3EFD3A8D2

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE MISSISSIPPI DEPARTMENT OF HUMAN SERVICES

Agreement No. 0094-2017-PAY-001

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Mississippi Department of Human Services for the acquisition of Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF) data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the Mississippi Department of Human Services to share SNAP data and enter into this agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026. The Food and Nutrition Act of 2008 limits the use of SNAP recipient information to those directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the SNAP program because Census will provide to the state copies of its tabulations of the data for the state to use in administering its SNAP program.

The authority for the Mississippi Department of Human Services to share TANF data and enter into this agreement is the Public Health and Welfare Act, 42 U.S.C. § 613.

3. TERMS AND CONDITIONS

Pursuant to this agreement, the Mississippi Department of Human Services, hereinafter referred to as "the state program agency" shall transfer records to the Census Bureau from the administration of SNAP and TANF, hereinafter referred to as "the state data" and as described in Attachment A of this agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and Special Sworn Status ("SSS") researchers will have access to the data. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases

AMERICAN OVERSIGHT

DocuSign Envelope ID: 53144DF4-19BF-4A52-8707-B4E3EFD3A8D2

information related to this research, it may not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

   i. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of SNAP and administration of TANF for the years 2010—2021, as described in Attachment A.

   ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, record length and data dictionary.

   iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers may not contain any state data or direct identifiers.

   iv. To allow the Census Bureau staff and SSS researchers to use the state data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

   i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.

   ii. To provide the state program agency a table package based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American Community Survey (ACS). A table package shall include estimated rates of program eligibility and access/participation for the state overall and by various demographic, economic, and household characteristics and by county when the data allow. It also will include distributions across the same characteristics both for program participants and for those who are estimated to be eligible but do not participate. The table package will be delivered either within six (6) months from the date that the state administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.

   iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of

AMERICAN OVERSIGHT

DocuSign Envelope ID: 53144DF4-19BF-4A52-8707-B4E3EFD3A8D2

any report or other document containing information derived from the state data pertaining to SNAP and TANF and resulting from use under this agreement of the state data. If no comments are received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this agreement.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the agreement to prevent unauthorized use.

Processing Sites: Bowie Computer Center
Suitland Federal Center
Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency POC:

Cathy Sykes
Deputy Administrator, Programs
Mississippi Department of Human Services
750 N State St
Jackson, MS 39202
601-359-4888
cathy.sykes@mdhs.ms.gov

Census Bureau POC:

Dr. Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

AMERICAN OVERSIGHT

DocuSign Envelope ID: 53144DF4-19BF-4A52-8707-B4E3EFD3A8D2

5. FUNDING

The total amount to be paid by the Census Bureau to the state program agency via Electronic Funds Transfer (EFT) is $20,000. Funding is provided to reimburse the state program agency for resources needed to set up and complete the data extraction as described in Attachment C. This Agreement is considered to be a firm commitment. If this agreement is terminated on behalf of the state program agency prior to the completion of the data being transferred to the Census Bureau, the state program agency will return the funds within sixty (60) days of termination.

6. ACCOUNTING DATA

State Agency Accounting Data:

Appropriation No.:

CAN:

DUNS No.: **809399918**

EIN: **64-6000807**

Total Amount:

Control Number:

Census Bureau Accounting Data:

Agency Location Code: **13-04-0001**

Project Code: **0331000**

Division Code: **0094**

Object Class Code: **25-30-07-00**

TAS: **013 X 4512 000**

Business Event Type Code (BETC): **DISB**

Funds Expiration: **No Year**

Funds Cancellation Date: **No Year**

Organization Code: **11-09-0094-00-00-00-00**

DUNS No.: **929955383**

EIN: **52-0204537**

Total Amount: **$20,000.00**

Agreement No.: **0094-2017-PAY-001**

7. FINANCIAL POINTS OF CONTACT

State Agency Financial Contact:

Chris Christmas
Director of Budgets and Accounting
Mississippi Department of Human Services
750 N State St
Jackson, MS 39202
601-359-4665

AMERICAN OVERSIGHT

DocuSign Envelope ID: 53144DF4-19BF-4A52-8707-B4E3EFD3A8D2

Census Bureau Financial Contact:

Darrell Blyden
Chief, Financial Services Center
Finance Division
U.S. Census Bureau
4600 Silver Hill Road
Washington, DC 20233
(301) 763-4390
Darrell.b.blyden@census.gov

8. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement shall terminate six (6) years following the date on which it becomes effective. If, at the end of six (6) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, **in order to determine whether it should be revised, renewed or canceled.** The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Notwithstanding all other provisions of this agreement, the Parties agree that:

a. This agreement may be amended at any time by written mutual consent of both parties.

b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

The original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3. Terms and Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

9. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within

AMERICAN OVERSIGHT

DocuSign Envelope ID: 53144DF4-19BF-4A52-8707-B4E3EFD3A8D2

thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

10.CONFIDENTIALITY

Mississippi law protects the confidentiality of the state data, as well as:

- Medicaid, 42 U.S.C. § 1396(a)(a)(7), 42 CFR Part 431.300-307;
- Temporary Assistance to Needy Families, 42 U.S.C. § 602 (a)(1)(A)(iv);
- Supplemental Nutrition Assistance Program, 7 U.S.C. § 2020 (e)(8);
- 7 CFR Part 272.1(c);
- Social Security Act, 42 U.S.C. § 1396(a)(a)(7);
- Social Security Administration Disclosure, 20 CFR Part 401;
- Child Support, 42 U.S.C. § 654(26);
- Public Assistance Programs (Public Welfare), 45 CFR Part 205.50; and
- U.S. Department of Labor Employment and Training Administration, 20 CFR Part 603.

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the Chief Information Officer ("CIO"), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*." Security controls and subsequent assessments are to be completed based on the final categorization.

AMERICAN OVERSIGHT

DocuSign Envelope ID: 53144DF4-19BF-4A52-8707-B4E3EFD3A8D2

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team ("US CERT"). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

11.APPROVALS

11/30/2016

Michael Thieme (Date)
Acting Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

DocuSigned by:
AEDBFDD02F7A44A...

12/1/2016

Garrig Shields (Date)
Deputy Executive Director
Mississippi Department of Human Services

AMERICAN OVERSIGHT

DocuSign Envelope ID: 53144DF4-19BF-4A52-8707-B4E3EFD3A8D2

Attachment A: Data Elements

1. Data Requirements

Monthly data from the administration of SNAP and TANF for the years 2010—2021 will include, when available:

a. Case unit identifiers,
b. Current monthly case unit address (residence, mailing),
c. Benefit amounts received (monthly),
d. Income reporting requirement (simplified reporting, change reporting, etc.),
e. Gross income (monthly),
f. Net income (monthly),
g. Eligibility and denial information,
h. Identifiers for individuals in case units, and
i. The following information on individuals in a case unit:
    i. Name
    ii. Social Security Number
    iii. Case unit/main contact phone number
    iv. Relationship to primary recipient
    v. Race
    vi. Hispanic origin/Ethnicity
    vii. Sex
    viii. Date of birth
    ix. Education
    x. Employment
    xi. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)

AMERICAN OVERSIGHT

DocuSign Envelope ID: 53144DF4-19BF-4A52-8707-B4E3EFD3A8D2

Attachment B: Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records

The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of state programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing likely eligible non-participants of SNAP

Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to

AMERICAN OVERSIGHT

DocuSign Envelope ID: 53144DF4-19BF-4A52-8707-B4E3EFD3A8D2

each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

A. validating and enhancing the Master Address File (MAF);[1]
B. designing and assigning resources to carry out the 2020 Census;[2]
C. unduplicating public, private, and census lists; and
D. imputing missing data.[3]

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American

1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.
2 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.
3 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

AMERICAN OVERSIGHT

DocuSign Envelope ID: 53144DF4-19BF-4A52-8707-B4E3EFD3A8D2

population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

AMERICAN OVERSIGHT

DocuSign Envelope ID: 53144DF4-19BF-4A52-8707-B4E3EFD3A8D2

Attachment C: Statement of Work SNAP and TANF Data Extraction

Statement of Work

for the

U.S. Census Bureau Funding of the Data Extraction by the Mississippi Department of Human Services for SNAP and TANF Administrative Data

Under the referenced MOU [0094-2017-PAY-001] through which the Census Bureau is acquiring SNAP and TANF Administrative Data from the Mississippi Department of Human Services, Census Bureau funding reimburses the Mississippi Department of Human Services for its efforts to extract SNAP and TANF data for the years CY2010-CY2021, by providing funds to complete the following tasks:

Task 1 – Analysis, Design, and Initial File Delivery

Through this task, the Mississippi Department of Human Services has agreed to provide SNAP and TANF recipient data to the US Census Bureau. While there is no charge for the data, a considerable amount of design, programming, and testing work is needed to extract the data elements needed by the Census Bureau and create a series of "flat files" for transmission to the Census Bureau. We will extract SNAP and TANF case and client details for CY2010 through CY2021, create a series of files, review the files for accuracy, and provide them to the Census Bureau, along with a data dictionary and record layout, or other similar documentation. This task is expected to be completed by March 31, 2022, with delivery of all CY2010-CY2021 files.

Task 2 – Delivery of CY2010-CY2016 Data

Through this task, the CY2010-CY2016 data can be provided after CY2016 is complete. This is expected to be completed by June 30, 2017.

Task 3 – Delivery of CY2017 Data

Through this task, the CY2017 data can be provided after CY2017 is complete. This is expected to be completed by March 31, 2018.

Task 4 – Delivery of CY2018 Data

Through this task, the CY2018 data can be provided after CY2018 is complete. This is expected to be completed by March 31, 2019.

AMERICAN OVERSIGHT

DocuSign Envelope ID: 53144DF4-19BF-4A52-8707-B4E3EFD3A8D2

Task 5 – Delivery of CY2019 Data

Through this task, the CY2019 data can be provided after CY2019 is complete. This is expected to be completed by March 31, 2020.

Task 6 – Delivery of CY2020 Data

Through this task, the CY2020 data can be provided after CY2020 is complete. This is expected to be completed by March 31, 2021.

Task 4 – Delivery of CY2021 Data

Through this task, the CY2021 data can be provided after CY2021 is complete. This is expected to be completed by March 31, 2022.

AMERICAN OVERSIGHT

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE MONTANA DEPARTMENT OF PUBLIC HEALTH & HUMAN SERVICES

Agreement No. [2064-FY18-NFE-0134]

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Montana Department of Public Health and Human Services (DPHHS) for the acquisition of Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF) data.

2. AUTHORITY

The authority for the Census Bureau to enter into this Agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the DPHHS to share SNAP data and enter into this Agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026. The Food and Nutrition Act of 2008 limits the use of SNAP recipient information to those directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on October 24, 2017, has determined that the Census Bureau is directly connected with the administration of the SNAP program because Census will provide to the state copies of its research tabulations for the state to use in administering its SNAP program.

The authority for the DPHHS to share TANF data and enter into this Agreement is consistent with Section 1137 of the Social Security Act and Section 205.50 of Title 45, Code of Federal Regulations.

Additional authority for the DPHHS to enter into this Agreement is Section 53-2-211(4), Montana Code Annotated, and Rule 37.78.106(2)(d), Administrative Rules of Montana.

3. TERMS AND CONDITIONS

Pursuant to this Agreement, the DPHHS, hereinafter referred to as "the state program agency" shall transfer records to the Census Bureau from the administration of SNAP and TANF, hereinafter referred to as "the state data" and as described in Attachment A of this Agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and those Special Sworn Status (SSS) researchers participating in the projects will have access to the data. Access shall be limited to the minimum number of individuals necessary. Any data, records, or other information shared through this research Agreement are protected from unauthorized disclosure and shall be

AMERICAN OVERSIGHT

used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it may not be disclosed in individually-identifiable form that permits the identification of any individual respondents, businesses, organizations, or institutions, and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. To the extent provided by law, the Census Bureau will recognize the state program agency as the owner of the original data in the form that it is delivered to the Census Bureau, prior to its integration with confidential Census data. As owner of the original form of data only, the state program agency acknowledges that it has no ownership or control over the access, use or disclosure of confidential Census data, including the linked files containing both the original data and confidential Census data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

   i. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of SNAP and administration of TANF for the years 2012—2024, as described in Attachment A.

   ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this Agreement; including definitions of active participants, a record layout, record count, record length and data dictionary.

   iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers may not contain any state data or direct identifiers.

   iv. To allow the Census Bureau staff and SSS researchers to use the state data at the Processing Sites listed in Section 4 of this Agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this Agreement.

b. The Census Bureau agrees:

   i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this Agreement and only for the projects listed in Attachment B or those approved in writing by both parties.

   ii. To provide the state program agency with a copy of data tabulations that the Census Bureau will create for Census research purposes. Specifically, the Census Bureau will provide the state program agency with data tabulations based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American Community Survey (ACS). Data tabulations shall include estimated rates of program eligibility and access/participation for the state overall and by various demographic, economic, and household characteristics and by county when the data allow. It also will include

AMERICAN OVERSIGHT

distributions across the same characteristics both for program participants and for those who are estimated to be eligible but do not participate. The data tabulations will be delivered either within six (6) months from the date that the state administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.

iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to SNAP and TANF and resulting from use under this Agreement of the state data. If no comments are received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this Agreement.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this Agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the Agreement to prevent unauthorized use. The parties mutually agree that the following locations are designated for data processing, analysis, and storage within the Census Network:

Sites:
Bowie Computer Center
Suitland Federal Center
Federal Statistical Research Data Centers
Census Approved Cloud Services

The parties mutually agree that the following named individuals will be designated as points of contact for the Agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency POC:

Christie Twardoski
Deputy Administrator
Human and Community Services Division
Department of Public Health & Human Services
Post Office Box 202925
Helena, MT 59620-2925
(406) 444-1917
ctwardoski@mt.gov

Census Bureau POC:
Michael Berning
Assistant Division Chief
Data Acquisition and Curation

AMERICAN OVERSIGHT

Economic Reimbursable Surveys Division
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-2028
michael.a.berning@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This Agreement is effective on the date on which it is signed by both parties. The Agreement shall terminate six (6) years following the date on which it becomes effective. If, at the end of six (6) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this Agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the Agreement, **in order to determine whether it should be revised, renewed or canceled.** The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Notwithstanding all other provisions of this Agreement, the Parties agree that:

a. This Agreement may be amended at any time by written mutual consent of both parties.

b. Either party may terminate this Agreement upon thirty (30) days written notice to the other party.

To the extent permitted by federal law, the original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3, Terms and Conditions. Any revisions to the data retention timetable after the execution of this Agreement will be stated in writing in an amendment to this Agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this Agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this Agreement.

To promote organizational transparency, and in support of data discovery for current and future research projects, the U.S. Census Bureau posts non-sensitive data documentation to public-facing websites. This documentation, such as a record layout or data dictionary, can include file descriptions, variable lists, variable labels and valid values for each variable.

AMERICAN OVERSIGHT

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this Agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this Agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this Agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

The Census Bureau will promptly consider and adjudicate, in accordance with Federal law, claims which may arise for damages of any nature arising out of a Census Bureau act under this Agreement. Such adjudication will be pursued under the Federal Tort Claims Act, 28 U.S.C. Section 2671 et seq., the Federal Employees Compensation Act, 5 U.S.C. Section 8101 et seq., or such other legal authority as may be pertinent. The U.S. Department of Justice shall determine the appropriate venues for any litigation arising under this Agreement.

7. CONFIDENTIALITY

A. IT Security

Sections 53-2-105 and 53-2-106, Montana Code Annotated, and Rule 37.78.106(1), Administrative Rules of Montana, protect the confidentiality of the state data, as well as:

- Medicaid, 42 U.S.C. § 1396(a)(a)(7), 42 CFR Part 431.300-307;
- Temporary Assistance to Needy Families, 42 U.S.C. § 602 (a)(1)(A)(iv);
- Supplemental Nutrition Assistance Program, 7 U.S.C. § 2020 (e)(8);
- 7 CFR Part 272.1(c);
- Social Security Act, 42 U.S.C. § 1396(a)(a)(7);
- Social Security Administration Disclosure, 20 CFR Part 401;
- Child Support, 42 U.S.C. § 654(26);
- Public Assistance Programs (Public Welfare), 45 CFR Part 205.50; and
- U.S. Department of Labor Employment and Training Administration, 20 CFR Part 603.

The Census Bureau will comply with all federal laws applicable to the privacy or security of data received pursuant to this Agreement. As a federal agency, the Census Bureau is not subject to state laws, however the Census Bureau will comply with the requirements of applicable state laws to the extent that they do not conflict with the Census Bureau's requirements under federal law.

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13,

AMERICAN OVERSIGHT

United States Code. The data provided under this Agreement are confidential under 13, U.S.C. § 9. Per the Federal Cybersecurity Enhancement Act of 2015, these data are also protected from cybersecurity risks through screening of the systems that transmit the data. Upon receipt, all data acquired as a result of this Agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the Chief Information Officer (CIO), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices.*" Security controls and subsequent assessments are to be completed based on the final categorization.

Cloud providers must be approved for at least moderate level information through the GSA FedRAMP process prior to acquiring any services. Census Bureau identifies, assesses and authorizes use based on the published FedRAMP results and an assessment of any Census Bureau (customer provided) controls implemented to protect the infrastructure and data. Security reporting on cloud providers is reported to the Department of Commerce on a regular basis under FISMA.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum M-17-12. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau becomes aware of a known breach of the State Data, the Census Bureau will contact the state program agency contacts to discuss the actions and potential remedies regarding the incident.

B. Disclosure Avoidance Review of Statistical Products

Title 13, Section 9 of the United States Code (U.S.C.) requires the Census Bureau to keep confidential the information collected from the public under the authority of Title 13. Section 214 of Title 13, U.S.C., and Sections 3551, 3559 and 3571 of Title 18, U.S.C., provide for the imposition of penalties of up to five years in prison and/or up to $250,000.00 in fines for wrongful disclosure of confidential census information.

AMERICAN OVERSIGHT

Disclosure avoidance is the process for protecting the confidentiality of data, as required under Title 13 U.S.C. A disclosure of data occurs when someone can use published statistical information to identify an individual who has provided confidential information under a pledge of confidentiality. For data tabulations, the Census Bureau uses disclosure avoidance procedures to modify or remove the characteristics that put confidential information at risk for disclosure. Although a published table may appear to show information about a specific individual, the Census Bureau has taken steps to disguise or suppress the original data, while making sure the results are still useful. The techniques used by the Census Bureau to protect confidentiality in tabulations vary, depending on the type of data.

The parties understand that Title 13 confidentiality protection and disclosure avoidance techniques apply to all work described in this Agreement. The disclosure avoidance disclosure methods are defined by the Census Bureau which has the responsibility of carrying out that work. Accordingly, upon completion of the tabulation, the data produced must be reviewed by the Census Bureau to ensure that no identifiable Title 13 data are or may be disclosed. Should the Census Bureau's Disclosure Review Board (DRB) determine that the requested statistical product does or reasonably could result in such disclosure, then the data product will be modified prior to approval for release to the party(ies) to this Agreement. The DRB must approve before a research product can be released to an individual who does not have SSS and a need to know, or moved to a computer not approved for controlled data according to Census' existing policies and procedures.

8. APPROVALS

3-6-2018

Nick Orsini (Date)
Assistant Director, Economic Programs
U.S. Census Bureau

4-9-18

Jamie Palagi (Date)
Administrator
Human and Community Services Division

AMERICAN OVERSIGHT

Attachment A: Data Elements

1. Data Requirements

Monthly data from the administration of SNAP and TANF for the years 2012—2024 will include, when available:

a. Case unit identifiers,
b. Active Participant definitions,
c. Complete monthly case unit address history (residence, mailing),
d. Benefit amounts received (monthly),
e. Income reporting requirement (simplified reporting, change reporting, etc.),
f. Gross income (monthly),
g. Net income (monthly),
h. Eligibility and denial information,
i. Identifiers for individuals in case units, and
j. The following information on individuals in a case unit:
    i. Name
    ii. Social Security Number
    iii. Case unit/main contact phone number
    iv. Relationship to primary recipient
    v. Race
    vi. Hispanic origin/Ethnicity
    vii. Sex
    viii. Date of birth
    ix. Education
    x. Employment
    xi. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)

AMERICAN OVERSIGHT

Attachment B: Description of Approved Research Projects

1. **Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records**

   The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

   This project will focus on evaluating and improving the measurement of state programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

   This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. **Characterizing likely eligible non-participants of SNAP**

   Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. **Improve Census Bureau Record Linkage Methods**

   The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to

AMERICAN OVERSIGHT

each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

A. validating and enhancing the Master Address File (MAF);[1]
B. designing and assigning resources to carry out the 2020 Census;[2]
C. unduplicating public, private, and census lists; and
D. imputing missing data.[3]

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American

---

1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.
2 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.
3 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

AMERICAN OVERSIGHT

population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

AMERICAN OVERSIGHT

MEMORANDUM OF AGREEMENT
ESTABLISHING A JOINT PROJECT BETWEEN
THE U.S. CENSUS BUREAU
AND
THE OREGON PUBLIC HEALTH DIVISION, OREGON WIC PROGRAM
0094-FY17-NFE-0091

1. PARTIES AND PURPOSE

Under this Memorandum of Agreement (MOA), the Census Bureau will provide Oregon Public Health Division, Oregon WIC Program (Oregon WIC), with information on the feasibility of conducting statistical analyses of WIC administrative records data linked to other sources of data at the Census Bureau, including but not limited to surveys, decennial censuses, and other administrative records sources. The linked data may be used to research the demographic and economic characteristics of persons in the files and relationships between participation in WIC and income, employment, housing, health, incarceration, and participation in other public assistance programs.

2. LEGAL AUTHORITY

A. The Census Bureau is authorized to enter into this agreement pursuant to 13 U.S.C., Section 8(b), which allows the Census Bureau to engage in joint statistical projects with Federal and State Agencies on matters of mutual interest, upon equitable apportionment of costs. Additional authority is provided by 13 U.S.C., Section 6 which allows the Census Bureau to obtain information pertinent to the Census Bureau's Title 13 U.S.C. work from Federal and State Agencies.

B. The Oregon WIC is authorized to enter into this agreement pursuant to Oregon Revised Statutes 411.116.

3. PURPOSE

Pursuant to this agreement, the Census Bureau will explore the completeness and quality of identification variables in the Oregon WIC data. The Census Bureau will also explore the feasibility of linking administrative data obtained through the Oregon WIC with other records at the Census Bureau, including, but not limited to, the American Community Survey (ACS), Current Population Survey (CPS), Master Address File (MAF), Census of Population and Housing, and Longitudinal Employer Household Dynamics (LEHD) database. The Census Bureau will also link the data disclosed through Oregon WIC to administrative records from public and private sources. The Census Bureau has determined that this project cannot be done as effectively without the participation of the Oregon WIC.

AMERICAN OVERSIGHT

4. MUTUAL INTEREST OF THE PARTIES

The Census Bureau benefits in that it will use these linked data to improve the quality of the demographic and economic censuses and surveys that it conducts. The data contained in the linked files are to be used for statistical research described in Attachment A. New projects may be initiated in writing to Oregon WIC and the Census Bureau Data Custodian for review and written approval by both agencies throughout the term of this MOA. New projects must include a description of the project and Title 13 benefits to the Census Bureau. All new projects and any modifications, expansions, or enhancements to existing projects that are approved will be subject to all of the terms and conditions of this MOA.

Oregon WIC will benefit from the joint research linking WIC administrative data to various data sources that the Census Bureau maintains to study outcomes such as income, employment, housing, health insurance usage, and program participation. The linked data will be used to evaluate the quality of key variables in the WIC data and coverage of persons in the data by demographic and socioeconomic characteristics.

5. RESPONSIBILITIES OF THE PARTIES

The Census Bureau will perform the work as described below:

A. Acquire data from Oregon WIC
   1. The Census Bureau will obtain, process, and maintain data disclosed by Oregon WIC at the Census Bureau in accordance with COMMERCE/Census-8, Statistical Administrative Records System.
   2. The Census Bureau will protect all data, records, data elements, and any other information collected, gathered, obtained, or otherwise received by the Census Bureau under this agreement from unauthorized disclosure. All information regarding corrections data is confidential, and the Census Bureau shall follow the appropriate requirements to maintain the confidentiality of information concerning BJS persons and facilities. Any violations of this provision or the provisions of the federal statutes listed above shall be considered cause for immediate termination of this agreement.
   3. The Census Bureau will ensure that data acquired under this agreement may be accessed in the Census Bureau's Research Data Center (RDC) Network under the approved projects as described in Attachment A and those that meet all review criteria and are approved by Oregon WIC and the Census Bureau using the Census Bureau's standard data protection processes. Access to the anonymized analytical data files created through this agreement shall be limited to the minimum number of individuals necessary and will include Title 13, U.S.C., Section 23 (c) Special Sworn Status (SSS) researchers participating in the project at the Census Bureau.

AMERICAN OVERSIGHT

B. Validate person records
    1. A unique Protected Identification Key (PIK) will be assigned to records to allow linkage between Oregon WIC files, Census Bureau data, and other administrative records data.
    2. Tabulations will be created that provide information about the socio-economic characteristics of validated and non-validated records.

C. Validate address records
    1. A unique unit-level address (MAFID) will be assigned to records to allow linkage between Oregon WIC files, Census Bureau data, and other administrative records data.
    2. Tabulations will be created that provide information about the structures and areas of MAF-matched and non-MAF-matched addresses.

D. Produce statistical outputs per Oregon WIC specifications
    1. A set of tabulations designed to inform the Census Bureau and Oregon WIC about the quality of linkage with other sources of data and characteristics about Oregon WIC program participants.
    2. In order to produce these tabulations, it may be necessary to adjust the survey weights Census Bureau data to account for biases resulting from issues including un-validated records and other data anomalies. Reweighting procedures will be designed and implemented to account for unmatched persons or units.

The Oregon WIC agrees to perform the following activities and provide the following resources:

1. The Oregon WIC will prepare and transfer WIC participants' data to the Census Bureau, via Secure FTP. A transfer of data for 2008 thru the most recent completed calendar year will be delivered initially. Additional years of data thru 2020 will be transferred when they are available.

2. The Oregon WIC will provide records count, layouts, and data dictionaries for WIC participants data that will be transferred for the initial delivery and subsequent years of data delivery (Attachment B).

3. The Oregon WIC program will provide analytic support to the Census Bureau in the interpretation of data linkage results.

6. EQUITABLE APPORTIONMENT OF COSTS

The costs associated with this MOA are equitably apportioned. The Census Bureau will provide 1.25 FTE to enhance matching algorithms, develop metadata and match the WIC data to existing data assets.

AMERICAN OVERSIGHT

Oregon WIC will provide 1.0 FTE with Special Sworn Status (SSS) for research support on the WIC data and linked survey-administrative data.

7. CONFIDENTIALITY

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence and to use the data for statistical purposes only in accordance with the provisions of Title 13, United States Code. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with the National Institute of Standards and Technology (NIST) Federal Information Processing Standards (FIPS) 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO as well as the Department of Commerce Office of Inspector General as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*." Security controls and subsequent assessments are done based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are reported within one hour to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau becomes aware of a known breach of the Oregon WIC data, the Census Bureau will contact the identified WIC contacts to discuss the actions and potential remedies in regards to the incident.

8. CONTACTS

The primary contacts of each party to this agreement are:

Census Bureau Points of Contact:

Michael Berning
Center for Administrative Records Research and Applications

AMERICAN OVERSIGHT

U.S. Census Bureau
Phone: (301) 763-2028
Fax: (301) 763-4310
Email: michael.a.berning @census.gov

Sonya Porter
Center for Administrative Records Research and Applications
U.S. Census Bureau
Phone: (301) 763-6038
Fax: (301) 763-4310
Email: sonya.rastogi.porter@census.gov

Oregon WIC Points of Contact:

Timothy D. Noe, PhD
Center Administrator
Center for Prevention and Health Promotion
Public Health, Oregon WIC Program
Phone: (971) 673-1139
Email: timothy.d.noe@state.or.us

Julie A. Reeder, PhD, MPH, CHES
Senior Research Analyst
Public Health, Oregon WIC Program
Phone: (971) 673-0051
Email: julie.a.reeder@state.or.us

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such a change.

9. DURATION OF AGREEMENT, AMENDMMENTS, AND MODIFCIATIONS

This agreement will become effective when signed by all parties. The agreement will terminate 5 years from the date signed, but may be amended at any time by mutual consent of the parties. The parties will review this agreement at least once every 3 years to determine whether it should be revised, renewed, or canceled. Any party may terminate this agreement by providing 30 days written notice to the other party.

AMERICAN OVERSIGHT

10. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

11. SIGNATURES

1/12/2017

Dr. John Eltinge **Date**
Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

12/28/16

Timothy D. Noe, PhD **Date**
Oregon Public Health Division, Oregon State WIC Program

AMERICAN OVERSIGHT

Attachment A

U.S. Census Bureau Description of Approved Research Projects

1. **Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records**

   The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

   This project will focus on evaluating and improving the measurement of state programs in the American Community Survey (ACS), the Current Population Survey (CPS) and the Survey of Income and Program Participation (SIPP). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

   This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. **Characterizing WIC participants and likely eligible non-participants of WIC**

   WIC data linked to ACS data can provide characteristic information for women, infants, and children participating in the WIC program. Additionally, infants and children with a high probability of being eligible for WIC can be estimated using ACS information on family structure, reported income, and public assistance.[1] The estimated eligible infants and children can be matched to the administrative WIC data to determine who is estimated to be eligible but not participating in the program, helping agencies determine unmet need. The project results can help state agencies improve outreach efforts. This research helps the Census Bureau better understand their survey and census data.

3. **Improve Census Bureau Record Linkage Methods**

   The Census Bureau's Person Identification Validation System (PVS) uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys,

1 Eligible pregnant and breastfeeding women cannot be identified in ACS data.

AMERICAN OVERSIGHT

Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

A. validating and enhancing the Master Address File (MAF);[2]
B. designing and assigning resources to carry out the 2020 Census;[3]
C. unduplicating public, private, and census lists; and
D. imputing missing data.[4]

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American population and economy. As Census and other Federal Statistical Agencies successfully

---

2 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.
3 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.
4 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

AMERICAN OVERSIGHT

integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

AMERICAN OVERSIGHT

Attachment B

Oregon WIC Core File Record Layout

Data elements needed to support approved projects shall include but not be limited to:

FIELD NAME	COMMENTS
CALENDAR_YEAR	YYYY
FAMILY_ID	Numeric, 4-7 digits no leading zeros
WIC_CATEGORY_CODE	**One of the following:** C1 = Child 13-23 months C2-5 = Child 2-5 years IB1-3 = Partially breastfeeding infant 1-3 months IB4-6 = Partially breastfeeding infant 4-6 months IB7-12 = Partially breastfeeding infant 7-12 months IE0-3 = Exclusively breastfeeding infant 0-3 months IE4-6 = Exclusively breastfeeding infant 4-6 months IE7-12 = Exclusively breastfeeding infant 7-12 months IN0-3 = Non breastfeeding infant 0-3 months IN4-6 = Non breastfeeding infant 4-6 months IN7-12 = Non breastfeeding infant 7-12 months NB = Newborn, partially breastfeeding NE = Newborn, exclusively breastfeeding NN = Newborn, non breastfeeding WB = Woman, partially breastfeeding WE = Woman, exclusively breastfeeding WN = Woman, non breastfeeding WP = Woman, pregnant
DATE_OF_BIRTH	MMDDYYYY
LAST_NAME	Text
FIRST_NAME	Text
MIDDLE_NAME	Text
PHONE_HOME	Text, format (3 area) 3 prefix-4 number
PHONE_CELL	Text, format (3 area) 3 prefix-4 number
FULL_STREET	Text
CITY	Text
STATE	Text
ZIP_CODE	Numeric, 5 digits
ZIP_PLUS_4	Numeric, 4 digits

Gender

AMERICAN OVERSIGHT

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
WOMEN, INFANTS AND CHILDREN ADMINISTRATIVE DATA
FROM
THE COMMONWEALTH OF PENNSYLVANIA,
DEPARTMENT OF HEALTH, BUREAU OF WOMEN, INFANTS AND CHILDREN

Agreement No. 0094-FY16-NFE-0075

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Commonwealth of Pennsylvania, Department of Health, Bureau of Women, Infants and Children (PA WIC) for the acquisition of Women, Infants and Children (WIC) Administrative Data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for PA WIC to share WIC data and enter into this agreement is Section 17 of the Child Nutrition Act of 1966, 42 U.S.C. § 1786 and implementing regulations at 7 CFR Part 246. WIC regulations at 7 CFR 246.26(d)(1)(ii) limit the disclosure of WIC recipient information to those directly connected with the administration or enforcement of the WIC program. The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the WIC program because Census will provide to the state copies of its tabulations of the data for the state to use in administering its WIC program.

3. TERMS AND CONDITIONS

Pursuant to this agreement, the PA WIC, hereinafter referred to as "the state program agency", will transfer records to the Census Bureau from the administration of WIC, hereinafter referred to as "the state data" and as described in Attachment A of this agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and Special Sworn Status ("SSS") researchers will have access to the data. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it will not be

AMERICAN OVERSIGHT

disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

   i. To transfer to the Census Bureau via secure FTP (File Transfer Protocol) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of WIC for the years 2004—2021, as described in Attachment A.

   ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, and record length.

   iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers will not contain any state data or direct identifiers.

   iv. To allow the Census Bureau staff and Special Sworn Status (SSS) researchers to use the state data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

   i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.

   ii. To provide the state program agency a table package based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American Community Survey (ACS). A table package shall include estimated rates of program eligibility and access/participation for the state overall and by various demographic, economic, and household characteristics and by county when the data allow. It also will include distributions across the same characteristics both for program participants and for those who are estimated to be eligible but do not participate. The table package will be delivered either within six (6) months from the date that the state administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.

AMERICAN OVERSIGHT

iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to WIC and resulting from use under this agreement of the state data. If no comments are received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this agreement.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the agreement to prevent unauthorized use.

Processing Sites: Bowie Computer Center
Suitland Federal Center
Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency POC:

William Cramer
Director of WIC
Bureau of Woman, Infants and Children
Pennsylvania Department of Health
625 Forster Street
7th Floor West Health and Welfare Building
Harrisburg, PA 17120
(717) 738- 1289
w.cramer@pa.gov

Census Bureau POC: Dr. Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

AMERICAN OVERSIGHT

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement will terminate five (5) years following the date on which it becomes effective. If, at the end of five (5) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties will review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, **in order to determine whether it should be revised, renewed or canceled.** The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Notwithstanding all other provisions of this agreement, the Parties agree that:

a. This agreement may be amended at any time by written mutual consent of both parties.

b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

The original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3. Terms and Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of

AMERICAN OVERSIGHT

Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

7. CONFIDENTIALITY

Federal regulations governing WIC protect the confidentiality of data and participant information found at 7 CFR 246.26(e). The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 *"Recommended Security Controls for Federal Information Systems and Organizations,"* as well as Special Publication 800-37r1 *"Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach."* The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO (Chief Information Officer), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 *"Standards for Security Categorization of Federal Information and Information Systems"* and NIST Special Publication 800-60r1 *"Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices."* Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

AMERICAN OVERSIGHT

8. APPROVALS

RV 9/30/16

Ron Jarmin (Date)
Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

10/1/17

Lori Stubbs (Date)
Director, Bureau of Administrative & Financial Services
Pennsylvania Department of Health

AMERICAN OVERSIGHT

Attachment A: Data Elements

1. Data Requirements

Data from the administration of WIC for the years 2004—2021 will include, when available, but not limited to:

a. Case unit identifiers,
b. Complete monthly case unit address history (residence, mailing),
c. Benefit amounts received (monthly),
d. Income reporting requirement (simplified reporting, change reporting, etc.),
e. Gross income (monthly),
f. Net income (monthly),
g. Eligibility and denial information,
h. Identifiers for individuals in case units, and
i. The following information on individuals in a case unit:
    i. Name
    ii. Case unit/main contact phone number
    iii. Relationship to primary recipient
    iv. Recipient or Caretaker phone number
    v. Race
    vi. Hispanic origin/Ethnicity
    vii. Sex
    viii. Date of birth
    ix. Education
    x. Employment
    xi. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)

AMERICAN OVERSIGHT

Attachment B: Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records

The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of state programs in the American Community Survey (ACS), the Current Population Survey (CPS) and the Survey of Income and Program Participation (SIPP). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing WIC participants and likely eligible non-participants of WIC

WIC data linked to ACS data can provide characteristic information for women, infants, and children participating in the WIC program. Additionally, infants and children with a high probability of being eligible for WIC can be estimated using ACS information on family structure, reported income, and public assistance.[1] The estimated eligible infants and children can be matched to the administrative WIC data to determine who is estimated to be eligible but not participating in the program, helping agencies determine unmet need. The project results can help state agencies improve outreach efforts. This research helps the Census Bureau better understand their survey and census data.

3. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System (PVS) uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would

1 Eligible pregnant and breastfeeding women cannot be identified in ACS data.

AMERICAN OVERSIGHT

have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

A. validating and enhancing the Master Address File (MAF);[2]
B. designing and assigning resources to carry out the 2020 Census;[3]
C. unduplicating public, private, and census lists; and
D. imputing missing data.[4]

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of

---

2 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.
3 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.
4 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

AMERICAN OVERSIGHT

comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

AMERICAN OVERSIGHT

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE TENNESSEE DEPARTMENT OF HUMAN SERVICES

Agreement No. 0094-FY16-NFE-0039

1. PARTIES AND PURPOSE

This Memorandum of Understanding ("Memorandum") documents agreement between the U.S. Census Bureau (Census Bureau) and the Tennessee Department of Human Services (TDHS) for the acquisition of Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF) data.

2. AUTHORITY

The authority for the Census Bureau to enter into this Memorandum is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the TDHS to share SNAP data and enter into this Memorandum is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026. The Food and Nutrition Act of 2008 limits the use of SNAP recipient information to those directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the SNAP program because Census will provide to TDHS copies of its tabulations of the data for the state to use in administering its SNAP program.

The authority for the TDHS to share TANF data and enter into this Memorandum is the Public Health and Welfare Act, 42 U.S.C. § 613.

Additional authority for the TDHS to enter into this Memorandum is 7 CFR 272.1(c)(1)(i) and 45 CFR 205.50(a)(1)(i)(A).

3. TERMS AND CONDITIONS

Pursuant to this Memorandum, the TDHS, hereinafter referred to as "the state program agency" shall transfer data to the Census Bureau from the administration of SNAP and TANF, hereinafter referred to as "the state data" and as described in Attachment A of this Memorandum. All state data that the state program agency agrees to provide the Census Bureau shall remain confidential. To the extent provided by law, confidentiality of such data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act of 1974. To the extent provided by law, only Census Bureau staff and Special Sworn Status ("SSS") researchers will have access to the data. Any data, records, or other information shared through this research Memorandum are protected from unauthorized disclosure and shall be used solely for statistical purposes. When the Census Bureau publicly releases information related to this research, the Census Bureau shall ensure that it is not

AMERICAN OVERSIGHT

disclosed in individually-identifiable form and comply with all Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

   i. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) or appropriately encrypted CD-ROM or DVD-ROM, the state data for the years 2004—2021, as described in Attachment A.

   ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this Memorandum; including a record layout, record count, record length and data dictionary.

   iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers may not contain any state data or direct identifiers.

   Research projects exploring whether the administrative records represent the same individuals in survey or census households may need access to name data. Access to name data will only be granted through approval by the Census Bureau Data Stewardship Executive Policy Committee. Researchers may not have access to Social Security Numbers.

   iv. To allow the Census Bureau staff and SSS researchers to use the state data at the Processing Sites listed in Section 4 of this Memorandum for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this Memorandum.

b. The Census Bureau agrees:

   i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this Memorandum and only for the projects listed in Attachment B or those approved in writing by both parties.

   ii. To provide TDHS , within six (6) months of the time the state data is processed and provided to Census Bureau research staff, selected tabulations of the state SNAP and TANF data linked to the American Community Survey. SNAP profile tabulations shall describe the demographic and household characteristics of residents who are likely to be eligible for SNAP, but who do not participate in the program.

   iii. To the extent permitted by law, allow TDHS the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to SNAP and TANF and resulting from use under this Memorandum of the state data. If no

AMERICAN OVERSIGHT

comments are received from TDHS within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to TDHS . If no comments are received within thirty (30) business days from delivery of the reminder notice, TDHS will be deemed to have approved the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this Memorandum.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the agreement to prevent unauthorized use.

Processing Sites: Bowie Computer Center
Suitland Federal Center
Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the Memorandum on behalf of the state program agency and the Census Bureau, respectively:

Tennessee Department of Human Services POC:
Keisha Malone
Interim Director of Operations, Family Assistance
Citizen's Plaza
400 Deaderick Street
(615) 313-5292
Keisha.malone@tn.gov

Census Bureau POC: Dr. Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF MEMORANDUM, AMENDMENTS, AND MODIFICATIONS

This Memorandum is effective on the date on which it is signed by both parties. The Memorandum shall terminate five (5) years following the date on which it becomes

AMERICAN OVERSIGHT

effective. If, at the end of five (5) years, the parties wish to continue the relationship, they must execute a new Memorandum.

The parties shall review this Memorandum at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the Memorandum, **in order to determine whether it should be revised, renewed or canceled.** The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Notwithstanding all other provisions of this Memorandum, the Parties agree that:

a. This Memorandum may be amended at any time by written mutual consent of both parties.

b. Either party may terminate this Memorandum upon thirty (30) days written notice to the other party.

The original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3. Terms and Conditions. Any revisions to the data retention timetable after the execution of this Memorandum will be stated in writing in an amendment to this Memorandum. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this Memorandum. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this Memorandum.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this Memorandum, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this Memorandum may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this Memorandum, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

AMERICAN OVERSIGHT

7. CONFIDENTIALITY

State statutes protect the confidentiality of the state data, as well as:

- Medicaid, 42 U.S.C. § 1396(a)(a)(7), 42 CFR Part 431.300-307;
- Temporary Assistance to Needy Families, 42 U.S.C. § 602 (a)(1)(A)(iv);
- Supplemental Nutrition Assistance Program, 7 U.S.C. § 2020 (e)(8);
- 7 CFR Part 272.1(c);
- Social Security Act, 42 U.S.C. § 1396(a)(a)(7);
- Social Security Administration Disclosure, 20 CFR Part 401;
- Child Support, 42 U.S.C. § 654(26);
- Public Assistance Programs (Public Welfare), 45 CFR Part 205.50; and
- U.S. Department of Labor Employment and Training Administration, 20 CFR Part 603.

The Census Bureau assumes responsibility to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency Memorandum will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the Chief Information Officer ("CIO"), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*." Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team ("US CERT"). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

AMERICAN OVERSIGHT

8. APPROVALS

RJ 2/26/14

Ron Jarmin (Date)
Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

Charles Bryson 3/2/16

Charles Bryson (Date)
Assistant Commissioner
Tennessee Department of Human Services

AMERICAN OVERSIGHT

Attachment A: Data Elements

1. Data Requirements

Data from the administration of SNAP and TANF for the years 2004—2021 will include, when available:

a. Case unit identifiers,
b. Complete monthly case unit address history (residence, mailing),
c. History of benefit amounts received (monthly),
d. Income reporting requirement (simplified reporting, change reporting, etc.),
e. Gross income (monthly),
f. Net income (monthly),
g. Eligibility and denial information,
h. Identifiers for individuals in case units, and
i. The following information on individuals in a case unit:
    i. Name
    ii. Social Security Number
    iii. Contact phone number
    iv. Relationship to primary recipient/caretaker
    v. Race
    vi. Hispanic origin/Ethnicity
    vii. Sex
    viii. Date of birth
    ix. Education
    x. Employment
    xi. Earned income (employment, self-employment)
    xii. Unearned income
    xiii. Participation status

AMERICAN OVERSIGHT

Attachment B: Description of Approved Research Projects

1. **Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records**

   The U.S. Census Bureau administers multiple household surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

   This project will focus on evaluating and improving the measurement of state programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

   This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. **Characterizing likely eligible non-participants of SNAP**

   Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. **Improve Census Bureau Record Linkage Methods**

   The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to

AMERICAN OVERSIGHT

each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

A. validating and enhancing the Master Address File (MAF);[1]
B. designing and assigning resources to carry out the 2020 Census;[2]
C. unduplicating public, private, and census lists; and
D. imputing missing data.[3]

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

---

1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.
2 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.
3 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

AMERICAN OVERSIGHT

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
WOMEN, INFANTS, AND CHILDREN ADMINISTRATIVE DATA
FROM
THE UTAH WOMEN, INFANTS AND CHILDREN (WIC) PROGRAM

Agreement No. 0094-FY17-NFE-0080

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Utah WIC Program for the acquisition of Women, Infants, and Children (WIC) Administrative Data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the Utah WIC Program to share WIC data and enter into this agreement is Section 17 of the Child Nutrition Act of 1966, 42 U.S.C. § 1786 and implementing regulations at 7 CFR Part 246. WIC regulations at 7 CFR 246.26(d)(1)(ii) limit the disclosure of WIC recipient information to those directly connected with the administration or enforcement of the WIC program. The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the WIC program because Census will provide to the state copies of its tabulations of the data for the state to use in administering its WIC program.

Additional authority for the Utah WIC Program to enter into this agreement is the Utah Code Ann. 26-1-30.

3. TERMS AND CONDITIONS

Pursuant to this agreement, the Utah WIC Program, hereinafter referred to as "the state program agency", will transfer records to the Census Bureau from the administration of WIC, hereinafter referred to as "the state data" and as described in Attachment A of this agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and Special Sworn Status ("SSS") researchers will have access to the data. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it will not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey

AMERICAN OVERSIGHT

data and administrative records data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

   i. To transfer to the Census Bureau via secure FTP (File Transfer Protocol) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of WIC for the years 2011—2021, as described in Attachment A.

   ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, and record length.

   iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers will not contain any state data or direct identifiers.

   iv. To allow the Census Bureau staff and Special Sworn Status (SSS) researchers to use the state data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

   i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.

   ii. To provide the state program agency a table package based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American Community Survey (ACS). A table package shall include estimated rates of program eligibility and access/participation for the state overall and by various demographic, economic, and household characteristics and by county when the data allow. It also will include distributions across the same characteristics both for program participants and for those who are estimated to be eligible but do not participate. The table package will be delivered either within six (6) months from the date that the state administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.

   iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to WIC and resulting from use under this agreement of the state data. If no comments are received from the state program agency within fourteen (14) days from delivery of pre-publication

AMERICAN OVERSIGHT

documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this agreement.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the agreement to prevent unauthorized use.

Processing Sites: Bowie Computer Center
Suitland Federal Center
Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency POC:
Christopher D. Furner
Program Manager, Women, Infants and Children
Division of Family Health and Preparedness
3760 S. Highland Drive, Suite 512
Salt Lake City, UT 84106
801-273-2918
cfurner@utah.gov

Census Bureau POC: Dr. Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement will terminate six (6) years following the date on which it becomes effective. If, at the end of six (6) years, the parties wish to continue the relationship, they must execute a new agreement.

AMERICAN OVERSIGHT

The parties will review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, **in order to determine whether it should be revised, renewed or canceled.** The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Notwithstanding all other provisions of this agreement, the Parties agree that:

a. This agreement may be amended at any time by written mutual consent of both parties.

b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

The original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3. Terms and Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

7. CONFIDENTIALITY

Utah Code Title 26 Chapter 3 and Chapter 25 protects the confidentiality of the state data, as well as WIC regulations at 7 CFR 246.26(e). The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data

AMERICAN OVERSIGHT

acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach.*" The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO (Chief Information Officer), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices.*" Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

The remainder of this page is intentionally left blank.

AMERICAN OVERSIGHT

8. APPROVALS

11/21/2016

Michael Thieme (Date)
Acting Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

11/22/16

Shari A. Watkins (Date)
Director, Office of Fiscal Operations
Utah Department of Health

AMERICAN OVERSIGHT

Attachment A: Data Elements

1. Data Requirements

Monthly data from the administration of WIC for the years 2011—2021 will include, when available:

a. Case unit identifiers,
b. Complete monthly case unit address history (residence, mailing),
c. Benefit received (monthly date or amount),
d. Income reporting requirement (simplified reporting, change reporting, etc.),
e. Gross income (monthly),
f. Net income (monthly),
g. Eligibility and denial information,
h. Identifiers for individuals in case units, and
i. The following information on individuals in a case unit:
    i. Name
    ii. Case unit/main contact phone number
    iii. Relationship to primary recipient
    iv. Recipient or Caretaker phone number
    v. Race
    vi. Hispanic origin/Ethnicity
    vii. Sex
    viii. Date of birth
    ix. Education
    x. Employment
    xi. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)

AMERICAN OVERSIGHT

Attachment B: Description of Approved Research Projects

1. **Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records**

   The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

   This project will focus on evaluating and improving the measurement of state programs in the American Community Survey (ACS), the Current Population Survey (CPS) and the Survey of Income and Program Participation (SIPP). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

   This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. **Characterizing WIC participants and likely eligible non-participants of WIC**

   WIC data linked to ACS data can provide characteristic information for women, infants, and children participating in the WIC program. Additionally, infants and children with a high probability of being eligible for WIC can be estimated using ACS information on family structure, reported income, and public assistance.[1] The estimated eligible infants and children can be matched to the administrative WIC data to determine who is estimated to be eligible but not participating in the program, helping agencies determine unmet need. The project results can help state agencies improve outreach efforts. This research helps the Census Bureau better understand their survey and census data.

3. **Improve Census Bureau Record Linkage Methods**

   The Census Bureau's Person Identification Validation System (PVS) uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would

1 Eligible pregnant and breastfeeding women cannot be identified in ACS data.

AMERICAN OVERSIGHT

have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

A. validating and enhancing the Master Address File (MAF);[2]
B. designing and assigning resources to carry out the 2020 Census;[3]
C. unduplicating public, private, and census lists; and
D. imputing missing data.[4]

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of

---

2 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.
3 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.
4 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

AMERICAN OVERSIGHT

comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

AMERICAN OVERSIGHT

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE WYOMING DEPARTMENT OF FAMILY SERVICES

Agreement No. [2064-FY18-NFE-0133]

1. **PARTIES AND PURPOSE**

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Wyoming Department of Family Services (DFS) for the acquisition of Supplemental Nutrition Assistance Program (SNAP) data.

2. **AUTHORITY**

The authority for the Census Bureau to enter into this Agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the Wyoming Department of Family Services to share SNAP data and enter into this Agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026. The Food and Nutrition Act of 2008 limits the use of SNAP recipient information to those directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on October 24, 2017, has determined that the Census Bureau is directly connected with the administration of the SNAP program because the Census Bureau will provide to the state copies of its research tabulations for the state to use in administering its SNAP program.

Additional guidance for the Wyoming Department of Family Services to enter into this Agreement is the Memorandum of Record Regarding the Sharing of State SNAP Recipient Data with the U.S. Census Bureau dated October 24, 2017.

3. **TERMS AND CONDITIONS**

Pursuant to this Agreement, the Wyoming Department of Family Services, hereinafter referred to as "the state program agency" shall transfer records to the Census Bureau from the administration of SNAP, hereinafter referred to as "the state data" and as described in Attachment A of this Agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and those Special Sworn Status (SSS) researchers participating in the projects will have access to the data.

AMERICAN OVERSIGHT

Access shall be limited to the minimum number of individuals necessary. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it may not be disclosed in individually-identifiable form that permits the identification of any individual respondents, businesses, organizations, or institutions, and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. To the extent provided by law, the Census Bureau will recognize the state program agency as the owner of the original data in the form that it is delivered to the Census Bureau, prior to its integration with confidential Census data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

A. The state program agency agrees:

   i. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of SNAP for the years 2004—2022, as described in Attachment A.

   ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this Agreement; including definitions of active participants, a record layout, record count, record length and data dictionary.

   iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers may not contain any state data or direct identifiers.

   iv. To allow the Census Bureau staff and SSS researchers to use the state data at the Processing Sites listed in Section 4 of this Agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this Agreement.

B. The Census Bureau agrees:

   i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this Agreement and only for the projects listed in Attachment B or those approved in writing by both parties.

   ii. To provide the state program agency with a copy of data tabulations that the Census Bureau will create for Census research purposes. Specifically, the Census Bureau will provide the state program agency with data

AMERICAN OVERSIGHT

tabulations based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American Community Survey (ACS). Data tabulations shall include estimated rates of program eligibility and access/participation for the state overall and by various demographic, economic, and household characteristics and by county when the data allows. It also will include distributions across the same characteristics both for program participants and for those who are estimated to be eligible but do not participate. The data tabulations will be delivered either within six (6) months from the date that the state administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.

iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to SNAP and resulting from use under this Agreement of the state data. If no comments are received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this Agreement.

4. **CONTACTS**

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this Agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the Agreement to prevent unauthorized use. The parties mutually agree that the following locations are designated for data processing, analysis, and storage within the Census Network:

Sites: Bowie Computer Center
Suitland Federal Center
Federal Statistical Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact (POC) for the Agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency POC:
Kristie Arneson
Economic Assistance Administrator
Wyoming Department of Family Services

AMERICAN OVERSIGHT

2300 Capitol Ave., Hathaway Bldg.
Cheyenne, WY 82002
(307) 777-6031
Kristie.arneson@wyo.gov

Census Bureau POC:

Michael Berning
Assistant Division Chief
Data Acquisition and Curation
Economic Reimbursable Surveys Division
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-2028
michael.a.berning@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. **DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS**

This Agreement is effective on the date on which it is signed by both parties. The Agreement shall terminate 5 years following the date on which it becomes effective. If, at the end of five (5) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this Agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, **in order to determine whether it should be revised, renewed or canceled.** The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Notwithstanding all other provisions of this Agreement, the Parties agree that:

A. This Agreement may be amended at any time by written mutual consent of both parties.

B. Either party may terminate this Agreement upon thirty (30) days written notice to the other party.

To the extent permitted by federal law, the original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3, Terms and Conditions. Any revisions to the data retention timetable after the execution of this Agreement will be stated in writing in an amendment

AMERICAN OVERSIGHT

to this Agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this Agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this Agreement.

To promote organizational transparency, and in support of data discovery for current and future research projects, the U.S. Census Bureau posts non-sensitive data documentation to public-facing websites. This documentation, such as a record layout or data dictionary, can include file descriptions, variable lists, variable labels and valid values for each variable.

6. **RESOLUTION OF DISAGREEMENTS**

Should disagreement arise on the interpretation of the provisions of this Agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this Agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this Agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

The Census Bureau will promptly consider and adjudicate, in accordance with Federal law, claims which may arise for damages of any nature arising out of a Census Bureau act under this Agreement. Such adjudication will be pursued under the Federal Tort Claims Act, 28 U.S.C. Section 2671 et seq.; the Federal Employees Compensation Act, 5 U.S.C. Section 8101 et seq., or such other legal authority as may be pertinent. The U.S. Department of Justice shall determine the appropriate venues for any litigation arising under this Agreement.

7. **CONFIDENTIALITY**

A. IT Security

The Wyoming Public Records Act protects the confidentiality of the state data, as well as:

AMERICAN OVERSIGHT

- Supplemental Nutrition Assistance Program, 7 U.S.C. § 2020 (e)(8);
- 7 CFR Part 272.1(c);
- Social Security Act, 42 U.S.C. § 1396(a)(a)(7);
- Social Security Administration Disclosure, 20 CFR Part 401;
- Public Assistance Programs (Public Welfare), 45 CFR Part 205.50; and
- U.S. Department of Labor Employment and Training Administration, 20 CFR Part 603.

The Census Bureau will comply with all federal laws applicable to the privacy or security of data received pursuant to this Agreement. As a federal agency, the Census Bureau is not subject to state laws; however the Census Bureau will comply with the requirements of applicable state laws to the extent that they do not conflict with the Census Bureau's requirements under federal law.

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, United States Code. The data provided under this Agreement are confidential under 13, U.S.C. § 9. Per the Federal Cybersecurity Enhancement Act of 2015, these data are also protected from cybersecurity risks through screening of the systems that transmit the data. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the Chief Information Officer ("CIO"), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*." Security controls and subsequent assessments are to be completed based on the final categorization.

Cloud providers must be approved for at least moderate level information through the GSA FedRAMP process prior to acquiring any services. Census Bureau identifies, assesses and authorizes use based on the published FedRAMP results and an assessment of any Census Bureau (customer provided) controls

AMERICAN OVERSIGHT

implemented to protect the infrastructure and data. Security reporting on cloud providers is reported to the Department of Commerce on a regular basis under FISMA.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum M-17-12. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team ("US CERT"). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

B. Disclosure Avoidance Review of Statistical Products

Title 13, Section 9 of the United States Code (U.S.C.) requires the Census Bureau to keep confidential the information collected from the public under the authority of Title 13. Section 214 of Title 13, U.S.C., and Sections 3551, 3559 and 3571 of Title 18, U.S.C., provide for the imposition of penalties of up to five years in prison and/or up to $250,000.00 in fines for wrongful disclosure of confidential census information.

Disclosure avoidance is the process for protecting the confidentiality of data, as required under Title 13 U.S.C. A disclosure of data occurs when someone can use published statistical information to identify an individual who has provided confidential information under a pledge of confidentiality. For data tabulations, the Census Bureau uses disclosure avoidance procedures to modify or remove the characteristics that put confidential information at risk for disclosure. Although a published table may appear to show information about a specific individual, the Census Bureau has taken steps to disguise or suppress the original data, while making sure the results are still useful. The techniques used by the Census Bureau to protect confidentiality in tabulations vary, depending on the type of data.

The parties understand that Title 13 confidentiality protection and disclosure avoidance techniques apply to all work described in this Agreement. The disclosure avoidance disclosure methods are defined by the Census Bureau which has the responsibility of carrying out that work. Accordingly, upon completion of the tabulation, the data produced must be reviewed by the Census Bureau to ensure that no identifiable Title 13 data are or may be disclosed. Should the Census Bureau's Disclosure Review Board (DRB) determine that the requested statistical product does or reasonably could result in such disclosure, then the data product will be modified prior to approval for release to the party(ies) to this Agreement. The DRB must approve before a research product can be released to an individual who does not have SSS and a need to know, or moved to a computer not approved for controlled data according to Census' existing policies and procedures.

AMERICAN OVERSIGHT

8. **APPROVALS**

The parties to this MOU, through their duly authorized representatives, have executed this MOU on the dates set out below, and certify that the have read, understood, and agreed to the terms and conditions of this MOU as set forth herein.

2-15-2018

Nick Orsini (Date)
Assistant Director, Economic Programs
U.S. Census Bureau

3/8/18

Thomas O. Forslund (Date)
Director
Wyoming Department of Family Services

#179035 Mar. 22, 2018

Margaret A. R. Schwartz, ~~Senior~~ Assistant Attorney General (Date)
Representing: Wyoming Department of Family Services

AMERICAN OVERSIGHT

Attachment A: Data Elements

1. **Data Requirements**

Monthly data from the administration of SNAP for the years 2004—2022 will include, when available:

a. Case unit identifiers,
b. Active Participant definitions,
c. Complete monthly case unit address history (residence, mailing),
d. Benefit amounts received (monthly),
e. Income reporting requirement (simplified reporting, change reporting, etc.),
f. Gross income (monthly),
g. Net income (monthly),
h. Eligibility and denial information,
i. Identifiers for individuals in case units, and
j. The following information on individuals in a case unit:
    i. Name
    ii. Social Security Number
    iii. Case unit/main contact phone number
    iv. Relationship to primary recipient
    v. Race
    vi. Hispanic origin/Ethnicity
    vii. Sex
    viii. Date of birth
    ix. Gross income (monthly)
    x. Net Income (monthly)
    xi. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)
    xii. Education
    xiii. Employment

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000985

Attachment B: Description of Approved Research Projects

1. **Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records**

   The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data; explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

   This project will focus on evaluating and improving the measurement of state programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

   This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. **Characterizing likely eligible non-participants of SNAP**

   Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

AMERICAN OVERSIGHT

COMM-CB-19-0824-A-000986

3. **Improve Census Bureau Record Linkage Methods**

The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. **Research, Testing and Operations for the 2020 Census**

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

A. validating and enhancing the Master Address File (MAF);[1]

B. designing and assigning resources to carry out the 2020 Census;[2]

C. unduplicating public, private, and census lists; and

D. imputing missing data.[3]

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

---

[1] Examples of possible Census Bureau uses include updating and evaluating the Master Address File.

[2] Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.

[3] Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

AMERICAN OVERSIGHT

5. **Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes**

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

AMERICAN OVERSIGHT

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
WOMEN, INFANTS, AND CHILDREN ADMINISTRATIVE DATA
FROM
THE WISCONSIN DEPARTMENT OF HEALTH SERVICES
WOMEN, INFANTS, AND CHILDREN (WIC) PROGRAM
Agreement No. [0094-FY17-PAY-007]

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Wisconsin Department of Health Services Women, Infants, and Children (WIC) Program for the acquisition of WIC Administrative Data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the Wisconsin Department of Health Services WIC Program to share WIC data and enter into this agreement is Section 17 of the Child Nutrition Act of 1966, 42 U.S.C. § 1786 and implementing regulations at 7 CFR Part 246. WIC regulations at 7 CFR 246.26(d)(1)(ii) limit the disclosure of WIC recipient information to those directly connected with the administration or enforcement of the WIC program. The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the WIC program because Census will provide to the state copies of its research tabulations for the state to use in administering its WIC program.

Additional authority for the Wisconsin DHS WIC Program to enter into this agreement was granted by the Data Governance Board in the Department of Health Services.

3. TERMS AND CONDITIONS

Pursuant to this agreement, the Wisconsin DHS WIC Program, hereinafter referred to as "the state program agency", will transfer records to the Census Bureau from the administration of WIC, hereinafter referred to as "the state data" and as described in Attachment A of this agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and those Special Sworn Status ("SSS") researchers participating in the projects will have access to the data. Access shall be limited to the minimum number of individuals necessary. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it will not be disclosed in individually-identifiable form and results

AMERICAN OVERSIGHT

will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. To the extent provided by law, the Census Bureau will recognize the state program agency as the owner of the original data in the form that it is delivered to the Census Bureau, prior to its integration with confidential Census data. As owner of the original form of data only, the state program agency acknowledges that it has no ownership or control over the access, use or disclosure of confidential Census data, including the linked files containing both the original data and confidential Census data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

   i. To transfer to the Census Bureau via secure FTP (File Transfer Protocol) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of WIC for the years 2010—2022, as described in Attachment A.

   ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, and record length.

   iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers will not contain any state data or direct identifiers.

   iv. To allow the Census Bureau staff and Special Sworn Status (SSS) researchers to use the state data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

   i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.

   ii. To provide the state program agency with a copy of data tabulations that the Census Bureau will create for Census research purposes. Specifically, the Census Bureau will provide the state program agency with data tabulations based on at least two consecutive calendar based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American Community Survey (ACS). Data tabulations shall include estimated rates of program eligibility and access/participation for the state overall and by various demographic, economic, and household characteristics and by county when the data allow. It also will include distributions across the same characteristics both for program participants and for those who are estimated to be eligible but do not participate. The data tabulations will be delivered either within six (6) months from the date that the state

AMERICAN OVERSIGHT

administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.

iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to WIC and resulting from use under this agreement of the state data. If no comments are received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this agreement.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the agreement to prevent unauthorized use.

Processing Sites: Bowie Computer Center
Suitland Federal Center
Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency POC:

Lisa Murphy
WIC & Nutrition Section Chief
Wisconsin Department of Health Services
1 W Wilson St
Madison, WI 53701
(608) 266-6780
Lisa.Murphy@wisconsin.gov

Census Bureau POC: Dr. Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

AMERICAN OVERSIGHT

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. FUNDING

The total amount to be paid by the Census Bureau to the state program agency via Electronic Funds Transfer (EFT) is $10,000.00. Funding is provided as financial support to reimburse the state program agency for resources needed to develop, set up, complete the data extraction, and deliver an initial production file within the first two years of this agreement, as described in Attachment C. The funding is only obligated for Task 1 in the Statement of Work (Attachment C). Tasks 2-7 will be completed on a no-funds-exchanged basis. This Agreement is considered to be a firm commitment.

6. ACCOUNTING DATA

State Agency Accounting Data:

Appropriation No.: **14800**

CAN:

DUNS No.: **0364488350000**

EIN: **39-6006469**

Total Amount: **$10,000.00**

Control Number:

Census Bureau Accounting Data:

Agency Location Code: **13-04-0001**

Project Code: **6750C01**

Division Code: **0094**

Object Class Code: **25-30-07-00**

TAS: **013 2017 2018 0450 000**

Business Event Type Code (BETC): **DISB**

Funds Expiration: **9/30/2018**

Funds Cancellation Date: **9/30/2023**

Organization Code: **11-09-0094-00-00-00-00**

DUNS No.: **929955383**

EIN: **52-0204537**

Total Amount: **$10,000.00**

Agreement No.: **0094-FY17-PAY-007**

7. FINANCIAL POINTS OF CONTACT

State Agency Financial Contact:

James Otterson
Financial Management Supervisor
Division of Enterprise Services
1 W Wilson St Room 756
Madison, WI 53701
(608) 267-3904
James.Otterson@wisconsin.gov

AMERICAN OVERSIGHT

Census Bureau Financial Contact:

Darrell Blyden
Chief, Financial Services Center
Finance Division
U.S. Census Bureau
4600 Silver Hill Road
Washington, DC 20233
(301) 763-4390
Darrell.b.blyden@census.gov

8. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement will terminate six (6) years following the date on which it becomes effective. If, at the end of six (6) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties will review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, **in order to determine whether it should be revised, renewed or canceled.** The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Notwithstanding all other provisions of this agreement, the Parties agree that:

a. This agreement may be amended at any time by written mutual consent of both parties.

b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

To the extent permitted by federal law, the original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3. Terms and Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

9. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty

AMERICAN OVERSIGHT

(30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

The Census Bureau will promptly consider and adjudicate, in accordance with Federal law, claims which may arise for damages of any nature arising out of a Census Bureau act under this agreement. Such adjudication will be pursued under the Federal Tort Claims Act, 28 U.S.C. Section 2671 et seq., the Federal Employees Compensation Act, 5 U.S.C. Section 8101 et seq., or such other legal authority as may be pertinent. The U.S. Department of Justice shall determine the appropriate venues for any litigation arising under this agreement.

10. CONFIDENTIALITY

State Statute Chapter 153 protects the confidentiality of the state data, as well as WIC regulations at 7 CFR 246.26(e). The Census Bureau will comply with all federal laws applicable to the privacy or security of data received pursuant to this agreement. As a federal agency, the Census Bureau is not subject to state laws, however the Census Bureau will comply with the requirements of applicable state laws to the extent that they do not conflict with the Census Bureau's requirements under federal law.

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO (Chief Information Officer), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2:*

AMERICAN OVERSIGHT

Appendices." Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

11. APPROVALS

5/24/2017

Dr. John Eltinge (Date)
Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

6/5/17

Chuck Warzecha (Date)
Deputy Administrator
Division of Public Health
Wisconsin Department of Health Services

AMERICAN OVERSIGHT

Attachment A: Data Elements

1. Data Requirements

Monthly data from the administration of WIC for the years 2010—2022 will include, when available:

a. Case unit identifiers,
b. Complete monthly case unit address history (residence, mailing),
c. Benefits received date,
d. Income reporting requirement (simplified reporting, change reporting, etc.),
e. Income (monthly),
f. Eligibility and denial information,
g. Identifiers for individuals in case units, and
h. The following information on individuals in a case unit:
    i. Name
    ii. Case unit/main contact phone number
    iii. Relationship to primary recipient
    iv. Recipient or Caretaker phone number
    v. Race
    vi. Hispanic origin/Ethnicity
    vii. Sex
    viii. Date of birth
    ix. Education
    x. Employment
    xi. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)

AMERICAN OVERSIGHT

Attachment B: Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records

The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of state programs in the American Community Survey (ACS), the Current Population Survey (CPS) and the Survey of Income and Program Participation (SIPP). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing WIC participants and likely eligible non-participants of WIC

WIC data linked to ACS data can provide characteristic information for women, infants, and children participating in the WIC program. Additionally, infants and children with a high probability of being eligible for WIC can be estimated using ACS information on family structure, reported income, and public assistance.[1] The estimated eligible infants and children can be matched to the administrative WIC data to determine who is estimated to be eligible but not participating in the program, helping agencies determine unmet need. The project results can help state agencies improve outreach efforts. This research helps the Census Bureau better understand their survey and census data.

3. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System (PVS) uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records. However, coverage for

1 Eligible pregnant and breastfeeding women cannot be identified in ACS data.

AMERICAN OVERSIGHT

some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

A. validating and enhancing the Master Address File (MAF);[2]
B. designing and assigning resources to carry out the 2020 Census;[3]
C. unduplicating public, private, and census lists; and
D. imputing missing data.[4]

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American population and economy. As Census and other Federal Statistical Agencies successfully

2 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.
3 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.
4 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

AMERICAN OVERSIGHT

integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

AMERICAN OVERSIGHT

Attachment C: Statement of Work for WIC Data Extraction

Statement of Work

for the

U.S. Census Bureau Funding of the Data Extraction Preparation by the

Wisconsin Department of Health Services for

WIC Administrative Data

Under the referenced MOU [0094-FY17-PAY-007] through which the Census Bureau is acquiring WIC Administrative Data from the Wisconsin Department of Health Services, Census Bureau funding reimburses the Department of Health Services efforts to extract WIC data for the years CY2010-CY2022, by providing funds to complete the following tasks:

Task 1 – Analysis, Design, and Initial File Delivery

Through this task, the Wisconsin Department of Health Services has agreed to provide WIC recipient data to the US Census Bureau. This data exists in the Wisconsin WIC Program Data Collection System. While there is no charge for the data, a considerable amount of design, programming, and testing work is needed to extract the data elements needed by the Census Bureau and create a series of "flat files" for transmission to the Census Bureau. We will extract WIC case and client details for CY2010 through CY2016, create a series of files, review the files for accuracy, and provide them to the Census Bureau, along with a data dictionary and record layout, or other similar documentation. This task is expected to be completed by December 31, 2017 with delivery of all CY2010-CY2016 files.

Task 2 – Delivery of CY2017 Data

Through this task, the CY2017 data can be provided after CY2017 is complete. This is expected to be completed by February 2018.

Task 3 – Delivery of CY2018 Data

Through this task, the CY2018 data can be provided after CY2018 is complete. This is expected to be completed by February 2019.

Task 4 – Delivery of CY2019 Data

Through this task, the CY2019 data can be provided after CY2019 is complete. This is expected to be completed by February 2020.

AMERICAN OVERSIGHT

Task 5 – Delivery of CY2020 Data

Through this task, the CY2020 data can be provided after CY2020 is complete. This is expected to be completed by February 2021.

Task 6 – Delivery of CY2021 Data

Through this task, the CY2021 data can be provided after CY2021 is complete. This is expected to be completed by February 2022.

Task 7 – Delivery of CY2022 Data

Through this task, the CY2022 data can be provided after CY2022 is complete. This is expected to be completed by February 2023.

AMERICAN OVERSIGHT

17-MOU-0068

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE UTAH DEPARTMENT OF WORKFORCE SERVICES

Agreement No. 0094-FY17-NFE-0105

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Utah Department of Workforce Services (DWS) for the acquisition of Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF) data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for DWS to share SNAP data and enter into this agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026. The Food and Nutrition Act of 2008 limits the use of SNAP recipient information to those directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the SNAP program because Census will provide to the state copies of its research tabulations for the state to use in administering its SNAP program.

The authority for DWS to share TANF data and enter into this agreement is the Public Health and Welfare Act, 42 U.S.C. § 613 and Section 1137 of the Social Security Act (42 U.S.C. 1320b-7. The Administration for Children and Families, through a Memorandum signed on December 7, 2016, has determined that sharing the data with the Census Bureau is consistent with the federal regulations implementing the disclosure requirements, 45 CFR 205.50, because the data are to be used to improve the accuracy of information the Census Bureau collects and states use that data in program management, policy-making and administration of TANF.

3. TERMS AND CONDITIONS

Pursuant to this agreement, DWS, hereinafter referred to as "the state program agency" shall transfer records to the Census Bureau from the administration of SNAP and TANF, hereinafter referred to as "the state data" and as described in Attachment A of this agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and those Special Sworn Status ("SSS") researchers participating in the projects will have access to the data. Access shall be limited to the

AMERICAN OVERSIGHT

minimum number of individuals necessary. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it may not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. To the extent provided by law, the Census Bureau will recognize the state program agency as the owner of the original data in the form that it is delivered to the Census Bureau, prior to its integration with confidential Census data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

    i. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) data from the administration of SNAP and administration of TANF for the years 2004—2022, as described in Attachment A.

    ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, record length and data dictionary.

    iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers may not contain any state data or direct identifiers.

    iv. To allow the Census Bureau staff and SSS researchers to use the state data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

    i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.

    ii. To provide the state program agency with a copy of data tabulations, to include matched microdata, that the Census Bureau will create for Census research purposes. Specifically, the Census Bureau will provide the state program agency with data tabulations based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American Community Survey (ACS). Data tabulationshall include estimated rates of program eligibility and access/participation for the state overall and by various demographic, economic, and household characteristics and by county when the data allow. It also will include distributions across the same characteristics both for program participants and for those who are estimated to be eligible but do not participate. The data tabulations will be delivered either within six

AMERICAN OVERSIGHT

(6) months from the date that the state administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.

iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to SNAP and TANF and resulting from use under this agreement of the state data. If no comments are received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this agreement.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the agreement to prevent unauthorized use.

Processing Sites: Bowie Computer Center
Suitland Federal Center
Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency POC:
Collin Peterson
MIS Supervisor
Utah Department of Workforce Services
140 E 300 S
Salt Lake City, UT 84111
801-526-9363
collinpeterson@utah.gov

Census Bureau POC: Dr. Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

AMERICAN OVERSIGHT

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement shall terminate six (6) years following the date on which it becomes effective. If, at the end of six (6) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, **in order to determine whether it should be revised, renewed or canceled.** The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Notwithstanding all other provisions of this agreement, the Parties agree that:

a. This agreement may be amended at any time by written mutual consent of both parties.

b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

To the extent permitted by federal law, the original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3. Terms and Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers

AMERICAN OVERSIGHT

and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

The Census Bureau will promptly consider and adjudicate, in accordance with Federal law, claims which may arise for damages of any nature arising out of a Census Bureau act under this agreement. Such adjudication will be pursued under the Federal Tort Claims Act, 28 U.S.C. Section 2671 et seq., the Federal Employees Compensation Act, 5 U.S.C. Section 8101 et seq., or such other legal authority as may be pertinent. The U.S. Department of Justice shall determine the appropriate venues for any litigation arising under this agreement.

7. CONFIDENTIALITY

Utah Code Title 63G, Chapter 2 protects the confidentiality of the state data, as well as:

- Medicaid, 42 U.S.C. § 1396(a)(a)(7), 42 CFR Part 431.300-307;
- Temporary Assistance to Needy Families, 42 U.S.C. § 602 (a)(1)(A)(iv);
- Supplemental Nutrition Assistance Program, 7 U.S.C. § 2020 (e)(8);
- 7 CFR Part 272.1(c);
- Social Security Act, 42 U.S.C. § 1396(a)(a)(7);
- Social Security Administration Disclosure, 20 CFR Part 401;
- Child Support, 42 U.S.C. § 654(26);
- Public Assistance Programs (Public Welfare), 45 CFR Part 205.50; and
- U.S. Department of Labor Employment and Training Administration, 20 CFR Part 603.

The Census Bureau will comply with all federal laws applicable to the privacy or security of data received pursuant to this agreement. As a federal agency, the Census Bureau is not subject to state laws, however the Census Bureau will comply with the requirements of applicable state laws to the extent that they do not conflict with the Census Bureau's requirements under federal law.

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the Chief Information Officer ("CIO"), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*"

AMERICAN OVERSIGHT

and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices.*" Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team ("US CERT"). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

8. APPROVALS

3/20/2017

Dr. John Eltinge (Date)
Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

4/17/17

Jon Pierpont (Date)
Executive Director
Utah Department of Workforce Services

AMERICAN OVERSIGHT

Attachment A: Data Elements

1. Data Requirements

Monthly data from the administration of SNAP and TANF for the years 2004—2022 will include, when available:

a. Case unit identifiers,
b. Complete monthly case unit address history (residence, mailing),
c. Benefit amounts received (monthly),
d. Income reporting requirement (simplified reporting, change reporting, etc.),
e. Gross income (monthly),
f. Net income (monthly),
g. Eligibility and denial information,
h. Identifiers for individuals in case units, and
i. The following information on individuals in a case unit:
    i. Name
    ii. Social Security Number
    iii. Case unit/main contact phone number
    iv. Relationship to primary recipient
    v. Race
    vi. Hispanic origin/Ethnicity
    vii. Sex
    viii. Date of birth
    ix. Education
    x. Employment
    xi. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)

AMERICAN OVERSIGHT

Attachment B: Description of Approved Research Projects

1. **Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records**

   The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

   This project will focus on evaluating and improving the measurement of state programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

   This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. **Characterizing likely eligible non-participants of SNAP**

   Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. **Improve Census Bureau Record Linkage Methods**

   The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to

AMERICAN OVERSIGHT

each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

A. validating and enhancing the Master Address File (MAF);[1]
B. designing and assigning resources to carry out the 2020 Census;[2]
C. unduplicating public, private, and census lists; and
D. imputing missing data.[3]

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American

1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.
2 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.
3 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

AMERICAN OVERSIGHT

population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

AMERICAN OVERSIGHT

DM17-004012

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE ARIZONA DEPARTMENT OF ECONOMIC SECURITY

Agreement No. 0094-FY17-NFE-0059

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Arizona Department of Economic Security for the acquisition of Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF) data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the Arizona Department of Economic Security to share SNAP data and enter into this agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026. The Food and Nutrition Act of 2008 limits the use of SNAP recipient information to those directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the SNAP program because Census will provide to the state copies of its tabulations of the data for the state to use in administering its SNAP program.

The authority for the Arizona Department of Economic Security to share TANF data and enter into this agreement is the Temporary Assistance for Needy Families (TANF) Block Grant, 42 U.S.C. § 613.

Additional authority for the state program agency to enter into this agreement is ARS §41-1959(C)(5).

3. TERMS AND CONDITIONS

Pursuant to this agreement, the Arizona Department of Economic Security (AZDES), hereinafter referred to as "the state program agency" shall transfer records to the Census Bureau from the administration of SNAP and TANF, hereinafter referred to as "the state data" and as described in Attachment A of this agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and

AMERICAN OVERSIGHT

the Privacy Act of 1974, 5 U.S.C § 552a. To the extent provided by law, only Census Bureau staff and Special Sworn Status ("SSS") researchers will have access to the data. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it may not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

   i. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of SNAP and administration of TANF for the years 2009—2021, as described in Attachment A.

   ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, record length and data dictionary.

   iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers may not contain any state data or direct identifiers.

   iv. To allow the Census Bureau staff and SSS researchers to use the state data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

   i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.

   ii. To provide the state program agency an aggregate table package based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American Community Survey (ACS). A table package shall include estimated rates of program eligibility and access/participation for the state overall and by various demographic, economic, and household characteristics and by county when the data allow. It also will include distributions across the same characteristics both for program participants and for those who are estimated to be eligible but do not participate. The table package will be

AMERICAN OVERSIGHT

delivered either within six (6) months from the date that the state administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.

iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to SNAP and TANF and resulting from use under this agreement of the state data. If no comments are received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this agreement.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the agreement to prevent unauthorized use.

Processing Sites: Bowie Computer Center
Suitland Federal Center
Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency POC: Carolyn McMahon
Data Security Manager
Department of Economic Security
1789 W Jefferson St.
Phoenix, AZ
(602) 542-0317
CMcMahon@azdes.gov

AMERICAN OVERSIGHT

Census Bureau POC: Dr. Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement, and the similarly descriptive Data Sharing Request detailed in Attachment C, are effective on the date on which it is signed by both parties. The agreement shall terminate six (6) years following the date on which it becomes effective. If, at the end of six (6) years, the parties wish to continue the relationship, they must execute a new agreement.

In order to determine whether the agreement should be revised, renewed or canceled, the state program agency and the Census Bureau's Associate Director for Research and Methodology will periodically review the terms of the agreement, at a minimum of at least once every three (3) years, to ensure it conforms with state program agency Policies and Procedures, as well as current and newly enacted Federal statutes or state law. In the event changes in either federal or state law, statutes or regulations occur that conflict with the terms of the agreement or render the terms of the agreement void, impracticable, or otherwise impossible, this agreement will terminate immediately. A new agreement or an amendment to the existing agreement will be initiated to provide for any changes that cannot be accommodated within the provisions of the existing agreement. The Census Bureau shall hold harmless the State of Arizona and its Department of Economic Security for any liability resulting from acts or omissions attributable to the Census Bureau.

Notwithstanding all other provisions of this agreement, the Parties agree that:

a. This agreement may be amended at any time by written mutual consent of both parties.

b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

In accordance with A.R.S. §38-511, the state program agency may within three (3) years after execution cancel the agreement, without penalty or further obligation, if any person significantly involved in initiating, negotiating, securing, drafting or creating the agreement on behalf of the State, at any time while the agreement is in effect, becomes an employee or agent of any other party to the agreement in any capacity or a consultant to any other party to the agreement with respect to the matter of the Agreement.

AMERICAN OVERSIGHT

So long as it is not inconsistent with federal law, the original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3. Terms and Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

To the extent permitted by federal records retention law, and in accordance with A.R.S. §35-214, and to the extent that A.R.S. §35-214 does not conflict with federal law, the Census Bureau shall retain all data and other records ("records") relating to the MOU for a period of five (5) years after the completion of the MOU. Authorized representatives of AZDES shall have access to any pertinent books, documents, papers and records of the parties to this agreement, in order to inspect or monitor compliance under this MOU, as authorized by law and so long as such access is not prohibited by federal law. So long as such access is not prohibited by federal law, the Census Bureau, upon request, shall produce the original of any or all such records.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

7. CONFIDENTIALITY

Arizona Revised Statutes Section 41-1959 and Section 46-135, including accompanying Arizona Administrative Code Rules 6-12-102 and 6-14-105, protect the confidentiality of the state data, as well as:

AMERICAN OVERSIGHT

- Medicaid, 42 U.S.C. § 1396a(a)(7), 42 CFR Part 431.300-307;
- Temporary Assistance to Needy Families, 42 U.S.C. § 602 (a)(1)(A)(iv);
- Supplemental Nutrition Assistance Program, 7 U.S.C. § 2020 (e)(8);
- 7 CFR Part 272.1(c);
- Child Support, 42 U.S.C. § 654(26);
- Public Assistance Programs (Public Welfare), 45 CFR Part 205.50; and
- U.S. Department of Labor Employment and Training Administration, 20 CFR Part 603.

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9.

Census Bureau employees and individuals with Special Sworn Status are data stewards with the responsibility to protect the confidentiality and privacy of information that is entrusted to them. This means that data and information are handled appropriately, as authorized, and in compliance with relevant laws. The Data Stewardship Awareness Training is mandatory and required to be taken annually. Data Stewardship Awareness training includes IT Security Awareness, Title 13 and Privacy Act responsibilities to reinforce the Census Bureau's strict confidentiality and privacy standards, and how those standards apply to every day work life. Failure to adhere to confidentiality standards may result in a civil suit, a fine of up to $250,000 and/or imprisonment of up to 5 years.

Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the Chief Information Officer ("CIO"), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*." Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team ("US CERT"). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the

AMERICAN OVERSIGHT

identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

8. Non-Discrimination

Consistent with federal law, the Census Bureau shall comply with non-discrimination rules and regulations, including the Americans with Disabilities Act.

9. APPROVALS

1/23/2017

Dr. John Eltinge (Date)
Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

Patty Clark 2/9/17

Patty Clark (Date)
Chief Procurement Officer
Arizona Department of Economic Security

Amy O'Hara

Dr. Amy O'Hara (Date)
Center Chief
Center for Administrative Records Research and Applications
Research and Methodology Directorate of the U.S. Census Bureau

Carolyn McMahon 1/26/17

Carolyn McMahon (Date)
Data Security Manager
Arizona Department of Economic Security

AMERICAN OVERSIGHT

2-3-17

Cari Allen (Date)
Division of Technology Services (DTS) Service Delivery Manager
Arizona Department of Economic Security

2.3.17

Jeffrey Raynor (Date)
Chief Information Security Officer
Arizona Department of Economic Security

AMERICAN OVERSIGHT

Attachment A: Data Elements

1. Data Requirements

Monthly data from the administration of SNAP and TANF for the years 2009—2021 will include, when available:

a. Case unit identifiers,
b. Complete monthly case unit address history (residence, mailing),
c. Benefit amounts received (monthly),
d. Income reporting requirement (simplified reporting, change reporting, etc.),
e. Gross income (monthly),
f. Net income (monthly),
g. Eligibility and denial information,
h. Identifiers for individuals in case units, and
i. The following information on individuals in a case unit:
    i. Name
    ii. Case unit/main contact phone number
    iii. Relationship to primary recipient
    iv. Race
    v. Hispanic origin/Ethnicity
    vi. Sex
    vii. Date of birth
    viii. Education
    ix. Employment
    x. Monthly income source (earnings, TANF, UI, general assistance, other)

AMERICAN OVERSIGHT

Attachment B: Description of Approved Research Projects

1. **Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records**

   The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

   This project will focus on evaluating and improving the measurement of state programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

   This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. **Characterizing likely eligible non-participants of SNAP**

   Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. **Improve Census Bureau Record Linkage Methods**

   The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to

AMERICAN OVERSIGHT

each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

A. validating and enhancing the Master Address File (MAF);[1]
B. designing and assigning resources to carry out the 2020 Census;[2]
C. unduplicating public, private, and census lists; and
D. imputing missing data.[3]

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American

1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.
2 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.
3 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

AMERICAN OVERSIGHT

population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

AMERICAN OVERSIGHT

Attachment C: Arizona Department of Economic Security – Data Sharing Request

J-119 DSA (11/2015)

ARIZONA DEPARTMENT OF ECONOMIC SECURITY
Information Risk Management,
3443 North Central, Site Code 829Z
Phoenix, Arizona 85012
Phone: (602) 771-2676 · Fax: (602) 364-0481

DATA-SHARING REQUEST/AGREEMENT

BETWEEN

REQUESTING ENTITY:

U.S. Census Bureau

(DES Division/Administration/Program/Office Name or External Organization Name)

AND

DATA MANAGER: ARIZONA DEPARTMENT OF ECONOMIC SECURITY

DBME / Family Assistance Administration

(Division/Administration/Program/Office Name)

DSA Effective Date: _____ Contract Start Date: _____ Contract Max End Date: *(If applicable)* _____	DSA Agreement No.: _____ Contract No: _____ UID: _____

Equal Opportunity Employer/Program
This document available in alternative formats by contacting: (602) 771-2670.

AMERICAN OVERSIGHT

Agreement No.: _____

SECTION I. REQUEST *(Completed by Requesting Entity)*

Use attachment if necessary

1a. PURPOSE OF THIS REQUEST *(What information is being requested and why? How will it be used? Define Business need. Give details/specifics.)*

Case and Demographic Data from the administration of SNAP and TANF for the years 2009—2021

1. Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records
This project will focus on evaluating and improving the measurement of state programs in the American Community Survey (ACS), the Current Population Survey (CPS) and the Survey of Income and Program Participation (SIPP).

2. Characterizing likely eligible non-participants of SNAP
This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs.

3. Improve Census Bureau Record Linkage Methods
The Census Bureau's Person Identification Validation System (PVS) uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS

4. Research, Testing and Operations for the 2020 Census

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes
This research is important to expand the Census Bureau data linkage infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. This is becoming mission critical to the Census Bureau. The data linkage infrastructure enables data discovery and secure analystic access for policy analysis, program evaluation, and research.

1b. INFORMATION TECHNOLOGY AND CONNECTIVITY TYPE *(vpn, DVD, citrix, Mainframe, etc; or some other alternative way of accessing application / data?) Select all appropriate and explain in detail Below:* ☐Citrix ☐ VPN-Client ☐MainFrame ☒ Secure-FTP ☐Secure-Email ☐ Other

DES will transfer to the Census Bureau via secure FTP (File Transfer Protocol) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of SNAP for the years 2009—2021, as described in Attachment A. DES will provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, record length and data dictionary.

AMERICAN OVERSIGHT

1c. INFORMATION TYPE BEING ACCESSED *(personal indentifiable information, FBI, SSA, HIPPA , define)*

Data from the administration of SNAP and TANF for the years 2009—2021 will include, when available:

a. Case unit identifiers,
b. Complete monthly case unit address history (residence, mailing),
c. History of benefit amounts received (monthly),
d. Income reporting requirement (simplified reporting, change reporting, etc.),
e. Gross income (monthly),
f. Net income (monthly),
g. Eligibility and denial information,
h. Identifiers for individuals in case units, and
i. The following information on individuals in a case unit:
   i. Name
   ii. Case unit/main contact phone number
   iii. Relationship to primary recipient
   iv. Race
   v. Hispanic origin/Ethnicity
   vi. Sex
   vii. Date of birth
   viii. Education
   ix. Employment
   x. Monthly income source (earnings, TANF, UI, general assistance, other)
   xi. History of membership in case unit

1d. WILL THIS INFORMATION BE RETAINED?

☒Yes ☐No If Yes, where and how?: So long as it is not inconsistent with federal law, the original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary

PLEASE SELECT THE TYPE OF INFORMATION REQUESTED AND SPECIFIC FIELDS

☐HIPPA ☐PCI ☐PHI ☒PII ☒Full name ☒Home address ☐SSN or National Identification number ☐Vehicle registration plate
☐Driver's license# ☐Fingerprints ☐Credit card numbers ☐Digital identity ☒Date of birth ☐Birthplace ☒Gender/race
☐Heath/ Medical records ☒Wage/Tax info ☒Telephone number ☐Criminal record ☐Medical Benefits eligibility records

The requester enters all information required for successful communication between the requesting entity and the DES IT Staff.

Contact Name (1): Dr. Amy O'Hara, Center Chief, Center for Administrative Records Research and Applications	Phone: (301) 763-5757
Contact Name (2): Katherine Reeves	Phone: (301) 763-7912
Contact Address: 4600 Silver Hill Rd, Washington, DC 20233	
Contact (1) E-Mail Address: amy.b.ohara@census.gov	Contact (2) E-Mail Address: katherine.l.reeves@census.gov
Contact Fax No: ( ) -	

AMERICAN OVERSIGHT

Agreement No.: _____

SECTION I. (cont.) ***REQUEST (Completed by Requesting Entity)***
Use attachment if necessary

2. CITE LAW, REGULATION, DIRECTIVE OR OTHER BASIS FOR THIS REQUEST

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.
The authority for the state agency to share SNAP data and enter into this agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026.

The authority for the Arizona Department of Economic Security to share TANF data and enter into this agreement is the Public Health and Welfare Act, 42 U.S.C. § 613.

Additional authority for the state program agency to enter into this agreement is ARS §41-1959(C)(5).

3. WILL OTHER ENTITIES INTERFACE/ WORK WITH YOUR ORGANIZATION?

☒ Yes ☐ No If Yes, identify entity and reason(s): Special Sworn Status individuals may access the data from the Economic Research Service of the FNS of the USDA to complete projects 2 and 5, as listed in #1 on this form. No PII data will be disclosed.

4. WILL IINFORMATION BE DISCLOSED/SHARED WITH ANOTHER ENTITY / ORGANIZATION?

☒ Yes ☐ No If Yes, identify the entity/Organization and reason(s) for disclosure: The Economic Research Service Special Sworn Status researchers. No PII data will be disclosed. For projects 2 and 5. All PII data is removed once the data is cleared and has gone through the Personal Validation System and receives a uniquie Census Bureau 9 digit identifier.

5. WILL DES DATA BE STORED IN ANY FORM OF (DATABASES, FILES, TAPES, PAPER COPYS, ETC.) WILL DATA BELONGING TO DES BE STORED IN A SECURE SPECIFIED ON-SITE LOCATION?

☒ Yes ☐ No If Yes, identify where, what type of data and how the data is to be stored, and for how long? So long as it is not inconsistent with federal law, data will be stored for 2 years on a secure, password protected server within the U.S. Census Bureau.

6. WHAT ARE THE SAFEGUARDS IN PLACE TO GUARD AGAINST UNAUTHORIZED ACCESS/DISCLOSURE OF THE INFORMATION; ACCESS CONTROL PARAMETERS, ROLE BASED ACCESS, ETC. ☒ Computers are stored in Secure ☐ Encryption ☒ Secure Physical Location ☐ Locked File Cabinet ☒ 8 Characters or more Password location ☒ Role based Access Permissions/Need to know

Only Census Bureau staff and Special Sworn Status (SSS) researchers will have access to the data. Any data, records, or other information shared through this research agreement will be protected from unauthorized disclosure and will be used solely for statistical purposes. The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347).
Census Bureau employees and individuals with Special Sworn Status are data stewards with the responsibility to protect the confidentiality and privacy of information that is entrusted to them. This means that data and information are handled appropriately, as authorized, and in compliance with relevant laws. The Data Stewardship Awareness Training is mandatory and required to be taken annually. Data Stewardship Awareness training includes IT Security Awareness, Title 13 and Privacy Act responsibilities to reinforce the Census Bureau's strict confidentiality and privacy standards, and how those standards apply to every day work life. Failure to adhere to confidentiality standards may result in a civil suit, a fine of up to $250,000 and/or imprisonment of up to 5 years.

AMERICAN OVERSIGHT

6a. IF AN INFORMATION BREACH SHOULD OCCUR, WHAT ARE YOUR PROCESSES AND PROCEDURES TO ADDRESS THIS? (SEE SECTION II, #6)

Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the Chief Information Officer ("CIO"), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*." Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team ("US CERT"). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

7. HOW WILL THE INFORMATION BE PRESENTED FOR USE? WILL THE INFORMATION BE POSTED, DIGITALLY COPIED, APPLICATION, ETC?

The data, with PII removed and the unique 9-digit identification number, will be made available only to SSS indivuals with permission rights to a server where the data is stored.

When the Census Bureau publicly releases information related to this research, it will not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data.

8. HOW WILL THIS INFORMATION BE DISPOSED OF WHEN NO LONGER NEEDED? SEE RETENTION POLICY.

To the extent permitted by federal law, the original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

So long as it is not inconsistent with federal law, the original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary.

PRINT NAME AND TITLE OF AUTHORIZED CONTACT	PHONE NO. (301) 763-5757 FAX ( ) - E-MAIL amy.b.ohara@census.gov		DATE
Amy O'Hara – Project POC Chief, Center for Administrative Records Research and Applications			6/3/2016
MAILING ADDRESS/SITE CODE	CITY	STATE	ZIP CODE
4600 Silver Hill Rd	Washington	DC	20233-

AMERICAN OVERSIGHT

Agreement No.: _____

SECTION II. STIPULATIONS REGARDING THE USE OF INFORMATION

STIPULATIONS APPLICABLE TO THE REQUESTING ENTITY:

1. Disclosure of the data provided to the Requesting Entity is not permitted unless specifically authorized.
2. Repackaging or redistribution of data or screens, or creation of separate files will not be permitted unless specifically authorized.
3. The data shall be used only to assist in legal valid business needs as stated in Section I, item 1a of this Agreement.
4. All data shall be stored in a physically secure logically encrypted facility/system following the physical security regulations and standards based on the type of data appropriate and related standards. HIPPA / PHI / PII / PCI/ PUB-1075 etc.
5. All data in electronic format shall be safeguarded and stored, processed and monitored so that unauthorized persons cannot compromise the information.
6. DES shall be notified with in 24hrs when an information breach occurs. Notification must be in accordance with timelines based on State and Federal law.
7. Only authorized staff will be given access to accomplish the purpose(s) specified in Section I, item 1a of this Agreement.
8. Staff shall view, read or attend an authorized data security awareness training class, where they will be instructed on confidentiality, privacy laws and penalties imposed when there in any non compliance. All staff with access to DES systems and/or applications must complete an annual recertification security awareness training class as scheduled by DES.
9. A **Request for Terminal Access and/or other Activity (J-125)** shall be used to request specific access for each authorized staff member and must be signed by the staff supervisor or designee.
10. All authorized staff are required to sign a **User Affirmation Statement (J-129)**, as a condition for using requested data. This affirmation statement must be resigned at three (3) year intervals as scheduled by DES.
11. Any changes requiring additional access or removal of access as, shall be reported promptly to the respective data security analyst.
12. Federal and state audit and data security personnel may have access to offices and records of the requesting entity to monitor or verify compliance with this Agreement.
13. This Data-Sharing Agreement will remain in effect for 10 years from the effective date unless otherwise stipulated in Section III or overridden by the Contract, a Memorandum of Understanding or an InterAgency Agreement. If duration is overridden by another document, please reference the document in Section III.
14. Upon Contract Termination, Media Sanitization procedures shall be adhered to in accordance to Arizona Statewide Policy – P8250 v 1.0 - The Business Unit shall sanitize digital and non-digital information system media containing Confidential information prior to disposal, release of organizational control, or release for reuse using defined sanitization techniques and procedures in accordance with the Media Protection Standard S8250. [NIST 800-53 MP-6] [HIPAA 164.310(d)(2)(i)] [HIPAA 164.310(d)(2)(ii)] [IRS Pub 1075]
15. All DES Contracts retention terms and conditions will be adhered to as written unless otherwise stated on DES Retention Policy ((DES 1-37-12-(01)(02)(03)) is applicable.
16. Requesting entity is responsible for all costs and licenses associated with securely connecting to DES and for maintaining confidential standards.

STIPULATIONS APPLICABLE TO HIPAA – HEALTH INSURANCE PORTABILITY & ACCOUNTABILITY ACT:

1. All staff shall attend an authorized HIPAA awareness training class, where they will be instructed on confidentiality, privacy, information safeguards and penalties imposed when compliance is breached.
2. If applicable, a "Business Associate Contract" [45 CFR 164.502(e), 154.504(e). 164.532(d) & (e)] on file and it will be attached to this data sharing agreement as an addendum.

STIPULATIONS APPLICABLE TO Division Data Owners:

1. DES Division Security Rep shall verify external or internal requesters and submit service desk ticket (SD) and attach the received (**J-125 from external customers only**) and process account. SD ticket must contain DSA# and all contents of attached J-125 in the SD summary field. DES Division Security Reps shall monitor and manage all accounts which have access to their data or with who this DSA in partnership.

AMERICAN OVERSIGHT

Agreement No.:

SECTION III. ADDITIONAL INFORMATION
Regarding Stipulations #1-#16 applicable to Requesting Entity, the Census Bureau only agrees, so long as they are not inconsistent with federal law. Regarding the following specific stipulations applicable to Requesting Entity, the exceptions noted are substitutions for the original stipulations in their entirety. **Exception to stipulation #2 -** The Census Bureau will link the state data to census data, survey data and administrative records data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation. The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.
Exception to stipulation #8 – The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Census Bureau employees and individuals with Special Sworn Status are data stewards with the responsibility to protect the confidentiality and privacy of information that is entrusted to them. This means that data and information are handled appropriately, as authorized, and in compliance with relevant laws. The Data Stewardship Awareness Training is mandatory and required to be taken annually. Data Stewardship Awareness training includes IT Security Awareness, Title 13 and Privacy Act responsibilities to reinforce the Census Bureau's strict confidentiality and privacy standards, and how those standards apply to every day work life. Failure to adhere to confidentiality standards may result in a civil suit, a fine of up to $250,000 and/or imprisonment of up to 5 years.
Exception to stipulation #9 – **This stipulation is not applicable.**
Exception to stipulation #10- **This stipulation is not applicable.**
Exception to stipulation #11 – The parties shall review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, in order to determine whether it should be revised, renewed or canceled. The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency. Notwithstanding all other provisions of this agreement, the Parties agree that: a. This agreement may be amended at any time by written mutual consent of both parties. b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

AMERICAN OVERSIGHT

Exception to stipulation #12 –
Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

Exception to stipulation #13 –
This agreement is effective on the date on which it is signed by both parties. The agreement shall terminate six (6) years following the date on which it becomes effective. If, at the end of six (6) years, the parties wish to continue the relationship, they must execute a new agreement.
The parties shall review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, **in order to determine whether it should be revised, renewed or canceled.** The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Exception to stipulations #14 and #15 –
So long as it is not inconsistent with federal law, the original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.
Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.
The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 *"Recommended Security Controls for Federal Information Systems and Organizations,"* as well as Special Publication 800-37r1 *"Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach."* The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the Chief Information Officer ("CIO"), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.
All information and information systems are categorized in accordance with NIST FIPS 199 *"Standards for Security Categorization of Federal Information and Information Systems"* and NIST Special Publication 800-60r1 *"Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices."* Security controls and subsequent assessments are to be completed based on the final categorization.
The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team ("US CERT").
Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

TERMINATION OF AGREEMENT ONLY: So long as it is not inconsistent with federal law --

a. Information will be returned based on Contract terms and conditions.	☐Yes ☒No
b. Information will be truncated (erased/deleted).	☒Yes ☐No
c. Information in physical form shall be shredded.	☒Yes ☐No
d. All of the above.	☐Yes ☐No

AMERICAN OVERSIGHT

 Agreement No.: _____

ROUTING INSTRUCTIONS for J-119

DATA SHARING AGREEMENT BETWEEN DES ENTITIES:

1. Section I, II and III are completed, contact information is provided and the document is signed by the requesting Division or Program Assistant Director, Program Administrator, or designee. The requesting entity Division or Program Security Analyst sends the document to the Data Managing Division/Program Security Analyst. The DSA/PSA from the Data Managing Division/Program will complete Section III and the recommendation in Section IV. If applicable, the Division HIPAA Privacy Officer will complete the recommendation in Section IV. Reason must be given if request is not recommended for approval. Section V is signed and dated by the Data Managing Assistant Director, Program Administrator or designee.

   EXCEPTION: All DERS UI Data Sharing Agreements will follow their own established process.

2. The data managing Division/Program Security Analyst forwards the Agreement to the Enterprise Delivery Team for signature and approval of Informaton technology connectivity. Enterprise service delivery team sends DSA back to the Division/Program security team for final signatures. The Agreement is signed, and dated by the Information Security Administrator. The original Agreement is sent back to the Division/Program entered into the tracking list. The Agreement is scanned PDF to the network share, for all data sharing agreements. DSA is not final until fully signed by all parties.

NOTE:
When the agreement is modified during the approval process, both entities must review the modifications and re-sign/date the document.

DATA-SHARING AGREEMENT BETWEEN DES AND AN EXTERNAL ENTITY:

1. Section I, II and III are completed by the requesting entity, contact information is provided and the document is signed by the requesting entity and Division or Program Assistant Director, Program Administrator, or designee. The Division or Program Security Analyst sends the document out for signatures. If applicable, the Division HIPAA Privacy Officer will complete the recommendation in Section IV. Reason must be given if request is not recommended for approval. Section V is signed and dated by the requesting entity administrator and Data Managing Assistant Director, Program Administrator or designee.

   EXCEPTION: All DERS UI Data Sharing Agreements will follow their own established process.

2. The data managing Division/Program Security Analyst forwards the Agreement to the Enterprise Delivery Team for signature and approval of Informaton technology connectivity. Enterprise service delivery team sends DSA back to the Division/Program security team for final signatures. The Agreement is signed, and dated by the Information Security Administrator. The original Agreement is sent back to the Division/Program entered into the tracking list. The Agreement is scanned PDF to the network share, for all data sharing agreements. DSA is not final until fully signed by all parties.

NOTE:
When the Agreement is modified during the approval process, both entities must review the modifications and resign/date the document.

AMERICAN OVERSIGHT

DATA SHARING AGREEMENT WITH INTERNAL (if applicable) EXTERNAL CONTRACTS BETWEEN ENTITIES PROCEDURES: STEP BY STEP

1. From the Contracts Division for which the Contract has been originally created, the authorized Contracts person shall contact the Security Representative from the specific Agency for which the Contract was created, notify that a Data Sharing Agreement (DSA) is needed and being requested and a copy must be sent to the Security Representative to start the process of creating a DSA.
    a. **NOTE: A DSA request will not be honored without a valid Contract (number) (*if applicable*) accompaning the DSA.**

2. Any external Contracts agreed upon by DES that include the sharing of information require a J-119 - Data Sharing Agreement (DSA). The normal longevity of the J-119 DSA is 10 years. The newly agreed upon Contract terms and conditions supersedes the longevity of the DSA length of 10 years to align with the Contracts terms, conditions, and longevity.

    a. Example: If a newly accepted Contract of 2 years needs a DSA, the DSA will align with the Contracts longevity of 2 years. A DSA is created.
    b. If at the end of the 2 years the contract is renewed for 1 more year, then the contract's personnel shall inform the Agency's Security Team of the contract extention. Agency's Security Team will update the DSA tracking database to reflect the contract extension. The DSA can be renewed every year(s) up to 10 years (the total lifecycle of a DSA) before a new DSA is created.

        i. J-119A (Amendment Form) is required when additional access to other information not stipulated in the original DSA is being requested. For any extentions/changes of a DSA along with the following requirements:
            1. J-119A must document the changes to the original DSA.
            2. J-119A must document the new Contract Number.
            3. Document any and all changes made on the renewed Contract that involve terms and conditions in the sharing of information.
            4. Assign an agreement number to the DSA and put the Contract number on the first page of the DSA (preferably typed).
            5. DSA with other hand written notes, directions, alterations and scratch offs will not be accepted by IRM.
            6. Security Representative will enter all data into the DSA Database and will select status field "pending signatures to IRM."

        Words of CAUTION:
            a. Security Representative that has created the DSA will have to reproduce the DSA once again to be compliant, no exceptions.
            b. A DSA that is attached to a Contract will not be approved by IRM without a valid contract number.

3. When the Security Representative has completed all the applicable/signatures, the DSA agreement is enterd into the Data Security Warehouse Database by the Security Representative with a status of "Pending-IRM Approval." Afterwards the DSA agreement is sent to IRM, to DES Information Security Administrator, 1720 W, Madison St., Phoenix, AZ 85007 (Site Code 829Z), for final review and approval. The agreement is then signed and dated by the Information Security Administrator.

4. The original agreement is filed in the DES Data Managing Division/Program and the IRM Security Representative confirms all data in the DSA database. The Agreement is not final until signed by the IRM Security Representative, the DES Executor, and the Requesting Entity(s).

5. A final digital copy of all signatures of essential personnel mentioned above is required to IRM for IRM Security Administrator to change the DSA to ACTIVE with in the database.

AMERICAN OVERSIGHT

MEMORANDUM OF UNDERSTANDING

ADHS MOU No. HU550021 / Census Bureau Agreement # 0094-2015-NFE-07

Memorandum of Understanding for Data Sharing ("MOU")

BETWEEN

ARIZONA DEPARTMENT OF HEALTH SERVICES ("ADHS")
DIVISION OF PUBLIC HEALTH SERVICES WIC PROGRAM (WIC)

AND

THE US CENSUS BUREAU (CENSUS BUREAU)

Definitions. Capitalized terms used herein shall have the meanings set forth in this Section [1]

1. "**Authorized Employees**" means the Census Bureau's employees who have a need to know or otherwise access Highly-Sensitive Personal Information or Personally Identifying Information to enable the Census Bureau to perform its obligations under this MOU

2. "**Authorized Persons**" means Authorized Employees who have a need to know or otherwise access Highly-Sensitive Personal Information or Personally Identifying Information to enable the Census Bureau to perform its obligations under this MOU, and who are bound in writing by confidentiality obligations sufficient to protect Personal Information in accordance with the terms and conditions of this MOU]

3. "**Highly-Sensitive Personal Information**" means an (i) individual's government-issued identification number (including social security number, driver's license number or state-issued identified number); (ii) financial account number, credit card number, debit card number, credit report information, with or without any required security code, access code, personal identification number or password, that would permit access to an individual's financial account; or (iii) biometric or health data

4. "**Personally Identifying Information**" means information provided to the Census Bureau by or at the direction of WIC, or to which access was provided to the Census Bureau by or at the direction of WIC, in the course of the Census Bureau's performance under this MOU that: (i) identifies or can be used to identify an individual (including, without limitation, names, signatures, addresses, telephone numbers, e-mail addresses and other unique identifiers), or (ii) can be used to authenticate an individual (including, without limitation, employee identification numbers, government-issued identification numbers, passwords or PINs, financial account numbers, credit report information, biometric or health data, answers to security questions and other personal identifiers), in case of both sub-clauses (i) and (ii), including, without limitation, all Highly-Sensitive Personal Information WIC's business contact information is not by itself deemed to be Personal Information

5. "**Security Breach**" means [(i)] any act or omission that [materially] compromises either the security, confidentiality or integrity of Personal Information or the physical, technical, administrative or organizational safeguards put in place by the Census Bureau [(or any Authorized Persons)] that relate to the protection of the security, confidentiality or integrity of Personal Information[, or (ii) receipt of a complaint in relation to the privacy practices of the Census Bureau [(or any Authorized Persons)] or a breach or alleged breach of this MOU relating to such privacy practices]

AMERICAN OVERSIGHT

1. Terms of the Agreement

This Agreement is effective on the date on which it is signed by both parties. The Agreement will terminate five (5) years following the date on which it becomes effective. If, at the end of five (5) years, the parties wish to continue the relationship, they must execute a new Agreement

The parties will review this Agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the Agreement, in order to determine whether it should be revised, renewed or canceled. The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and ADHS

Notwithstanding all other provisions of this Agreement, the Parties agree that:

1.1 This Agreement may be amended at any time by written mutual consent of both parties.

1.2 Either party may terminate this Agreement upon thirty (30) days written notice to the other party

The parties to this Agreement envision that upon expiration or termination of this Agreement, that the parties will execute a new Agreement permitting the Census Bureau continued use of the original state data. For this reason, the original state data will be retained by the Census Bureau after expiration or termination of this Agreement, unless ADHS notifies the Census Bureau in writing that the original state data are not to be retained by the Census Bureau past the expiration or termination of this Agreement. If, upon expiration or termination of this Agreement, ADHS notifies the Census Bureau Point of Contact in writing that the original state data covered by this Agreement are not to be retained by the Census Bureau, the data will be expunged from Census Bureau systems, so long as the data being expunged is not inconsistent with federal records retention law

If, upon expiration or termination of this Agreement, the Census Bureau retains the original state data, Census Bureau researchers will cease and desist all use of the state data until such time that a new Agreement is executed which permits the use of the state data by Census Bureau researchers. The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this Agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this Agreement

2. Termination:

2.1 This MOU remains in effect until terminated in accordance with Provision One (1) of this section, or as otherwise provided below.

2.1.1 Termination without Cause

Both the ADHS and the Census Bureau may terminate this MOU at any time with thirty (30) calendar days' notice, in writing specifying the termination date. Such notices shall be given by personal delivery or by certified mail, return receipt requested

2.1.2 Termination for Default

The ADHS reserves the right to terminate the MOU in whole or in part due to the failure of the Census Bureau to comply with any term or condition of the MOU

AMERICAN OVERSIGHT

2 1 3 **Cancellation for Conflict of Interest**

Pursuant to A R S § 38-511, the ADHS may cancel this MOU within three (3) years after MOU execution without penalty or further obligation if any person significantly involved in initiating, negotiating, securing, drafting or creating the MOU on behalf of ADHS is, or becomes at any time while the MOU or an extension of the MOU are in effect, an employee of or a consultant to any other party to this MOU with respect to the subject matter of the MOU The cancellation shall be effective when the Census Bureau receives written notice of the cancellation, unless the notice specifies a later time.

2 1 4 **Mutual Termination**

This MOU may be terminated by mutual written Agreement of the parties specifying the termination date and the terms for disposition of property and, as necessary, submission of required deliverables therein.

3. Confidentiality

A R S § 136-07 protects the confidentiality of the state data, as well as WIC regulations at 7 CFR 246 26(e) The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U S C. Section 9. Upon receipt, all data acquired as a result of this interagency Agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347) All systems are fully assessed against NIST Special Publication 800-53r3 "Recommended Security Controls for Federal Information Systems and Organizations," as well as Special Publication 800-37r1 "Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach " The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO (Chief Information Officer), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities

All information and information systems are categorized in accordance with NIST FIPS 199 "Standards for Security Categorization of Federal Information and Information Systems" and NIST Special Publication 800-60 "Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices " Security controls and subsequent assessments are to be completed based on the final categorization

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16 Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team (US CERT) Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state agency contacts to discuss the actions and potential remedies regarding the incident

4. Utilization of Confidential Information:

4 1 The Census Bureau agrees to monitor Authorized Persons use of WIC personally identifying data and not to use or disclose confidential medical information, Personally Identifying Information or Highly-Sensitive Personal Information other than as permitted by this MOU or as required by law,

AMERICAN OVERSIGHT

4 2 The Census Bureau agrees to use appropriate safeguards to prevent a Security Breach, such as, but not limited to, the disclosure of confidential medical information, Personally Identifying Information or

4 3 Highly-Sensitive Personal Information other than as provided by this MOU,

4 4 The Census Bureau agrees to mitigate, to the extent practicable, any harmful effect that is known to the Census Bureau from a use or disclosure of confidential medical information, Highly-Sensitive Personal Information, or Personally Identifying Information other than as provided by this MOU,

4 5 The Census Bureau agrees to report to the ADHS any Security Breach, including the use or disclosure of confidential medical information, Personally Identifying Information or Highly-Sensitive Personal Information not provided in this MOU of which it becomes aware, and

4 6 The Census Bureau agrees to ensure that any Authorized Persons, including any agent, or subcontractor to the Census Bureau, to whom the Census Bureau provides confidential medical information, Personally Identifying Information or Highly-Sensitive Personal Information received from the ADHS or created or received by the Census Bureau on behalf of the ADHS, agrees to the same restrictions and conditions that apply through this MOU to the Census Bureau with respect to such information

5. Records and Right of Inspection:

To the extent permitted by federal records retention law, the Census Bureau shall retain all data and other records ("records") relating to the MOU for a period of five (5) years after the completion of the MOU. Authorized representatives of ADHS shall have access to any pertinent books, documents, papers and records of the parties to this agreement, in order to inspect or monitor compliance under this MOU, as authorized by law.

6. Dispute Resolution:

The parties to this MOU agree to resolve all disputes arising out of, or relating to, this MOU through administrative review and management discussion, as necessary

7. Amendment or Modifications:

No amendment or modifications to this MOU, including any amendment or modification of this paragraph, shall be effective unless the same is in writing signed by the Parties

8. Relationship of Parties:

The Census Bureau under this MOU is an independent party Neither party to this MOU shall be deemed to be the employee or agent of the other party to the MOU

AMERICAN OVERSIGHT

9. Severability:

The Provisions of this MOU are severable Any term or condition deemed illegal or invalid shall not affect any other term or condition of the MOU

10. No Waiver:

Either Party's failure to insist on strict performance of any term or condition of the MOU shall not be deemed a waiver of that term or condition even if the party accepting or acquiescing in the nonconforming performance knows of the nature of the performance and fails to object to it

11. Non-disclosure of data:

The Census Bureau shall not disclose, in whole or in part, the data described in this MOU to any individual or agency not specifically authorized by this MOU the Census Bureau shall not disclose directly to, or use for the benefit of, any third party confidential information, knowledge or data acquired by virtue of its relationship with the other party named in this MOU, without the prior written approval of the other Party It is understood and agreed by the Parties that the obligations of this paragraph shall survive the expiration of termination of this MOU

12. Data Use and Ownership:

12 1 The Census Bureau may request data use approval from ADHS for development of papers or reports. Such papers, reports, or tables must have the specific written approval of the ADHS Human Subject Review Board (HSRB) before such products are submitted for presentation or publication

12 2 ADHS shall be cited as the source of the data in all tables, reports, presentations, and scientific papers, and the Census Bureau or its corresponding authors shall be cited as the source of interpretations, calculations, and/or manipulations of the data, including data visualizations

12 3 The Census Bureau shall furnish a copy of a proposed publication, including tables, or presentation, or request approval to the ADHS HSRB for review and comment.

AMERICAN OVERSIGHT

SCOPE OF WORK

1. Parties and Purpose

This Memorandum of Understanding establishes an Agreement between the U S Census Bureau (Census Bureau) and ADHS for the acquisition of Women, Infants, and Children (WIC) Administrative Data

2. Authority

The authority for the Census Bureau to enter into this Agreement is 13 U S C § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code
The authority for the ADHS to share WIC data and enter into this Agreement is Section 17 of the Child Nutrition Act of 1966, 42 U S C § 1786 and implementing regulations at 7 CFR Part 246 WIC regulations at 7 CFR 246 26(e) limit the disclosure of WIC recipient information to those directly connected with the administration or enforcement of the WIC program The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the WIC program because Census will provide to the state copies of its tabulations of the data for the state to use in administering its WIC program

3. Terms and Conditions

Pursuant to this Agreement ADHS will transfer records to the Census Bureau from the administration of WIC, hereinafter referred to as "the state data" and as described in Attachment A of this Agreement All data that the state program agency agrees to provide the Census Bureau remains confidential Maintaining confidentiality of these data is guaranteed under Title 13 U S C , Section 9, and the Privacy Act of 1974 Only Census Bureau staff and Special Sworn Status (SSS) researchers will have access to the data Any data, records, or other information shared through this research Agreement will be protected from unauthorized disclosure and will be used solely for statistical and outreach purposes When the Census Bureau publicly releases information related to this research, it will not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines The Census Bureau will link the state data to census data, survey data and administrative records data The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation

3 1 ADHS agrees to:

3 1 1 Transfer to the Census Bureau via secure FTP (File Transfer Protocol) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of WIC for the years 2004—2020, as described in Attachment A Data provided after the expiration of this Agreement will be provided through a new Agreement executed by both parties

3 1 2 Provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this Agreement; including a record layout, record count, and record length

3 1 3 Allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data Record linkage identifiers will not contain any state data or direct identifiers

3 1 4 Research projects exploring whether the administrative records represent the same individuals in survey or census households may need access to name data Access to name data will only be granted through approval by the Census Bureau Data Stewardship

AMERICAN OVERSIGHT

Executive Policy Committee Researchers will not have access to Social Security Numbers

3 1 5 Allow the Census Bureau staff and Special Sworn Status (SSS) researchers to use the state data at the Processing Sites listed in Section 4 of this Agreement for the projects listed in Attachment B or those approved in writing by both parties

3 2 The Census Bureau agrees.

3 2 1 To grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this Agreement and only for the projects listed in Attachment B or those approved in writing by both parties

3 2 2 To provide ADHS, within six (6) months of the receipt of acceptable data quality and acceptable file layouts, research by-product tabulations of the state data linked to the American Community Survey These tabulations will describe the demographic and household characteristics of residents who are likely to be eligible for WIC, but who do not participate in the program and compare those characteristics to the characteristics of the eligible participants

3 2 3 To provide ADHS a copy of the linked file containing all data elements used to describe demographic and household characteristics mentioned in section 3 2 2 of this document (including WIC, American Community Survey, other surveys and administrative records) for all likely eligible participants, plus census block identifier The state will analyze these data through geo-mapping to identify concentrations of likely eligible non-participants in order to locate areas of opportunity for outreach, potential clinic locations, and their proximity to vendors, schools, public services, and other potential partners; as well as to compare the characteristics of eligible participants to non-participants

3 2 4 To allow ADHS the opportunity to review and provide comments, clearance, or rejection of pre-publication copies of any report or other document containing information derived from the state data pertaining to WIC and resulting from use under this Agreement of the state data If no response is received from ADHS within thirty (30) days from delivery of pre-publication documents to ADHS, the Census Bureau shall send a reminder notice to ADHS If no response is received within three (3) business days from delivery of the reminder notice, ADHS will be deemed to have approved the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this Agreement

4. Contacts

The parties mutually agree that the following named individual is to be designated as custodian of the files on behalf of the Census Bureau and will be personally responsible for the observance of all conditions of use, and for the establishment and maintenance of security arrangements to prevent unauthorized use, as specified in the Agreement The Census Bureau agrees to notify ADHS within fifteen (15) days of any changes of custodianship

4 1 Custodian.

J Trent Alexander
Data Custodian
U S Census Bureau
4600 Silver Hill Road, 2K133
Washington DC 20233
Telephone. (301) 763-9810
Email. j trent alexander@census gov

AMERICAN OVERSIGHT

4 2 Processing Sites:
Bowie Computer Center
Suitland Federal Center
Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the Agreement on behalf of ADHS and the Census Bureau, respectively:

4 3 State agency POC:

Karen Sell
Bureau Chief
Bureau of Nutrition and Physical Activity
Arizona Department of Health Services
150 N 18th Ave Ate 310
Phoenix AZ 85007
Telephone: (602) 364-0687
Email: karen sell@azdhs gov

4 4 Census Bureau POC.

Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
U S Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
Telephone. (301) 763-5757
Email: amy b ohara@census gov

5. Resolution of Disagreements

Should disagreement arise on the interpretation of the provisions of this Agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration If Agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution

AMERICAN OVERSIGHT

6. **Approvals / Signatures**

For: US CENSUS BUREAU

RL

Ron Jarmin
Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

6/19/15

Date

For: ARIZONA DEPARTMENT OF HEALTH SERVICES

Authorized Signature

Rebecca O'Brien, Acting Chief Proc. Officer

Print Name & Title

6/30/15

Date

AMERICAN OVERSIGHT

Attachment A

Data Elements

1. Data Requirements

Data from the administration of WIC for the years 2004—2020 will include, when available:

1.1 Case unit identifiers,

1.2 Complete case unit address history (residence, mailing),

1.3 History of benefit amounts received (monthly),

1.4 Income reporting requirement (simplified reporting, change reporting, etc),

1.5 Gross income (monthly),

1.6 Net income (monthly),

1.7 Eligibility and denial information,

1.8 Identifiers for individuals in case units, and

1.9 The following information on individuals in a case unit:

1.10 Name

1.11 Social Security Number

1.12 Relationship to primary recipient

1.13 Race

1.14 Hispanic origin/Ethnicity

1.15 Sex

1.16 Date of birth

1.17 Education

1.18 Employment

1.19 Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)

1.20 History of membership in case unit

AMERICAN OVERSIGHT

Attachment B

Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records

The U.S. Census Bureau administers multiple household surveys that are designed to characterize the program participation characteristics of the U S population This project will evaluate the accuracy of such survey data; explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response

This project will focus on evaluating and improving the measurement of state programs in the American Community Survey (ACS), the Current Population Survey (CPS) and the Survey of Income and Program Participation (SIPP) In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway

This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing and reaching likely eligible non-participants of WIC

Persons with a high probability of being eligible for WIC can be modeled using ACS data on household composition and reported income The modeled eligible persons can be matched to the administrative WIC data to determine who participated in the program This research is important for the Census Bureau as it permits a greater understanding of whether WIC take-up is uniformly distributed across demographic and geographic groups Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs The project results in aggregate information that state agencies can use to improve outreach efforts

3. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System (PVS) uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records However, coverage for some populations may be incomplete in the PVS Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs

4. Research and Planning for the 2020 Census

The Census Bureau intends to test and potentially use data from many sources, including public and private sources, to design and conduct the 2020 Census The Census Bureau intends to use state program information, along with data from federal, state, and private sources to pursue the following four research initiatives, leading to improvements in quality and efficiency of 2020 Census operations:

AMERICAN OVERSIGHT

4 1 Validating and enhancing the Master Address File (MAF);

4 1 1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File

4 2 Designing and assigning resources to carry out the 2020 Census;

4 2 1 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning

4 3 Unduplicating public, private, and census lists; and

4 4 Imputing missing data

4 4 1 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources

Data quality will be explored using 2010 decennial census data to assess the quality and utility of household roster, location, and demographic characteristics data Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels These tabulations will be compared to the 2010 Census to assess accuracy based on the level of aggregation

AMERICAN OVERSIGHT

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
WOMEN, INFANTS, AND CHILDREN ADMINISTRATIVE DATA
FROM
THE COLORADO DEPARTMENT OF PUBLIC HEALTH & ENVIRONMENT

Agreement No. 0094-2015-NFE-06

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Department of Public Health & Environment of the State of Colorado for the acquisition of Women, Infants, and Children (WIC) Administrative Data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the Department of Public Health & Environment of the State of Colorado to share WIC data and enter into this agreement is Section 17 of the Child Nutrition Act of 1966, 42 U.S.C. § 1786 and implementing regulations at 7 CFR Part 246. WIC regulations at 7 CFR 246.26(e) limit the disclosure of WIC recipient information to those directly connected with the administration or enforcement of the WIC program. The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the WIC program because Census will provide to the state copies of its tabulations of the data for the state to use in administering its WIC program.

3. TERMS AND CONDITIONS

Pursuant to this agreement, the Department of Public Health & Environment of the State of Colorado, hereinafter referred to as "the state program agency", will transfer records to the Census Bureau from the administration of WIC, hereinafter referred to as "the state data" and as described in Attachment A of this agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. Maintaining confidentiality of these data is guaranteed under Title 13 U.S.C, Section 9, and the Privacy Act of 1974. Only Census Bureau staff and Special Sworn Status (SSS) researchers will have access to the data. Any data, records, or other information shared through this research agreement will be protected from unauthorized disclosure and will be used solely for statistical purposes. When the Census Bureau publicly releases

AMERICAN OVERSIGHT

information related to this research, it will not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state agency agrees:

   i. To transfer to the Census Bureau via secure FTP (File Transfer Protocol) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of WIC for the months and years from October 2011—December 2016, as described in Attachment A.

   ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, and record length.

   iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers will not contain any state data or direct identifiers.

   Research projects exploring whether the administrative records represent the same individuals in survey or census households may need access to name data. Access to name data will only be granted through approval by the Census Bureau Data Stewardship Executive Policy Committee. Researchers will not have access to Social Security Numbers.

   iv. To allow the Census Bureau staff and Special Sworn Status (SSS) researchers to use the state data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

   i. To grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.

   ii. To provide the state agency, within six (6) months of the receipt of acceptable data quality and acceptable file layouts, research by-product tabulations of the state data linked to the American Community Survey. These tabulations will describe the demographic and household characteristics of residents who are likely to be eligible for WIC, but who do not participate in the program.

   iii. To allow the state agency the opportunity to review and provide comments, clearance, or rejection of pre-publication copies of any report

AMERICAN OVERSIGHT

or other document containing information derived from the state data pertaining to WIC and resulting from use under this agreement of the state data. If no response is received from the state agency within thirty (30) days from delivery of pre-publication documents to the state agency, the Census Bureau shall send a reminder notice to the state agency. If no response is received within three (3) business days from delivery of the reminder notice, the state agency will be deemed to have approved the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this agreement.

4. CONTACTS

The parties mutually agree that the following named individual is to be designated as custodian of the files on behalf of the Census Bureau and will be personally responsible for the observance of all conditions of use, and for the establishment and maintenance of security arrangements to prevent unauthorized use, as specified in the agreement. The Census Bureau agrees to notify the state agency within fifteen (15) days of any changes of custodianship.

Custodian:
J. Trent Alexander
Data Custodian
U.S. Census Bureau
4600 Silver Hill Road, 2K133
Washington DC 20233
(301) 763-9810
j.trent.alexander@census.gov

Processing Sites:
Bowie Computer Center
Suitland Federal Center
Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the state agency and the Census Bureau, respectively:

State agency POC:
Erin Ulric
WIC Director
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, Colorado 80246
303.692.2452
erin.ulric@state.co.us

AMERICAN OVERSIGHT

Census Bureau POC: Amy O'Hara
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement will terminate five (5) years following the date on which it becomes effective. If, at the end of five (5) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties will review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, **in order to determine whether it should be revised, renewed or canceled.** The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state agency.

Notwithstanding all other provisions of this agreement, the Parties agree that:

a. This agreement may be amended at any time by written mutual consent of both parties.

b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

The parties to this agreement envision that upon expiration or termination of this agreement, that the parties will execute a new agreement permitting the Census Bureau continued use of the original state data. For this reason, the original state data will be retained by the Census Bureau after expiration or termination of this agreement, unless the state agency notifies the Census Bureau in writing that the original state data are not to be retained by the Census Bureau past the expiration or termination of this agreement. If, upon expiration or termination of this agreement, the state agency notifies the Census Bureau Point of Contact in writing that the original state data covered by this agreement are not to be retained by the Census Bureau, the data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

If, upon expiration or termination of this agreement, the Census Bureau retains the original state data, Census Bureau researchers will cease and desist all use of the state data until such time that a new agreement is executed which permits the use of the state data by Census Bureau researchers. The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

AMERICAN OVERSIGHT

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

7. CONFIDENTIALITY

WIC regulations at 7 CFR 246.26(e) protect the confidentiality of the state data. The Census Bureau also assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r3 *"Recommended Security Controls for Federal Information Systems and Organizations,"* as well as Special Publication 800-37r1 *"Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach."* The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO (Chief Information Officer), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 *"Standards for Security Categorization of Federal Information and Information Systems"* and NIST Special Publication 800-60 *"Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices."* Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state agency contacts to discuss the actions and potential remedies regarding the incident.

AMERICAN OVERSIGHT

8. APPROVALS

3/11/15

Ron Jarmin (Date)
Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

3/17/15

Erin Ulric (Date)
WIC Director
Colorado Department of Public Health and Environment

AMERICAN OVERSIGHT

Attachment A: Data Elements

Data from the Colorado Department of Public Health and Environment administration of WIC for the months and years October 2011 – December 2016 will include, when available:

1. Data Requirements

Item	Requested data item from Census Bureau:	What Colorado Department of Public Health and Environment WIC data extract can provide:
a	Case Unit Identifier	Forward Facing Family Id (FID)
b	Complete case unit address history (residence, mailing)	Primary and Mailing address
c	History of benefit amounts received (monthly)	Redeemed food Instruments (Fis) for month
d	Income reporting requirement	We can provide the reporting period for their gross income (Bi-weekly, Monthly, Weekly, Annual, Semi-Monthly)
e	Gross Income	Gross Income
f	Net Income	**N/A**
g	Eligibility and denial information	Eligibility is confirmed with the certification record, denial is recorded when the participant is terminated ineligible
h	Identifiers for individuals in case units	Forward Facing Member ID (PID)
i.i	Name	First and last name
i.ii	SSN	**N/A**
i.iii	Relationship to primary recipient	We can only provide the mother relationship if the participant came in as an infant.
i.iv	Race	Race
i.v	Hispanic origin/Ethnicity	Ethnicity
i.vi	Sex	Sex
i.vii	Date of Birth	Date of Birth
i.viii	Education	We can provide education only when on a participant who is pregnant, postpartum or breastfeeding.
i.ix	Employment	**N/A**
i.x	Monthly income sources (earnings, TANF, SSI, SSA, UI, general assistance, other)	Monthly income sources
i.xi	History of membership	We can provide certification history

AMERICAN OVERSIGHT

Attachment B: Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records

The U.S. Census Bureau administers multiple household surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of state programs in the American Community Survey (ACS), the Current Population Survey (CPS) and the Survey of Income and Program Participation (SIPP). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing likely eligible non-participants of WIC

Persons with a high probability of being eligible for WIC can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative WIC data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether WIC take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System (PVS) uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records. However, coverage for

AMERICAN OVERSIGHT

some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research and Planning for the 2020 Census

The Census Bureau intends to test and potentially use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau intends to use state program information, along with data from federal, state, and private sources to pursue the following four research initiatives, leading to improvements in quality and efficiency of 2020 Census operations:

A. validating and enhancing the Master Address File (MAF);[1]
B. designing and assigning resources to carry out the 2020 Census;[2]
C. unduplicating public, private, and census lists; and
D. imputing missing data.[3]

Data quality will be explored using 2010 decennial census data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census to assess accuracy based on the level of aggregation.

1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.
2 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.
3 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

AMERICAN OVERSIGHT

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
WOMEN, INFANTS, AND CHILDREN ADMINISTRATIVE DATA
FROM
THE COLORADO WIC PROGRAM
OF
THE COLORADO DEPARTMENT OF PUBLIC HEALTH & ENVIRONMENT

Agreement No. [2064-FY19-NFE-0244]

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Department of Public Health & Environment of the State of Colorado, Colorado WIC Program, for the acquisition of Women, Infants, and Children (WIC) Administrative Data.

2. AUTHORITY

The authority for the Census Bureau to enter into this Agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the Department of Public Health & Environment of the State of Colorado to share Colorado WIC Program data and enter into this Agreement is Section 17 of the Child Nutrition Act of 1966, 42 U.S.C. § 1786 and implementing regulations at 7 CFR Part 246. WIC regulations at 7 CFR 246.26(d)(1)(ii) limit the disclosure of WIC recipient information to those directly connected with the administration or enforcement of the WIC program. The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on October 24, 2017, has determined that the Census Bureau is directly connected with the administration of the WIC program because Census will provide to the state copies of its research tabulations for the state to use in administering its WIC program.

3. TERMS AND CONDITIONS

Pursuant to this Agreement, the Department of Public Health & Environment of the State of Colorado, Colorado WIC Program, hereinafter referred to as "the state program agency", will transfer records to the Census Bureau from the administration of WIC, hereinafter referred to as "the state data" and as described in Attachment A of this Agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and those Special Sworn Status (SSS) researchers participating in the projects will have access to the data. Access shall be limited to the minimum number of individuals necessary. Any data, records, or other information shared through this research Agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement.

AMERICAN OVERSIGHT

When the Census Bureau publicly releases information related to this research, it will not be disclosed in individually-identifiable form that permits the identification of any individual respondents, businesses, organizations, or institutions, and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. To the extent provided by law, the Census Bureau will recognize the state program agency as the owner of the original data in the form that it is delivered to the Census Bureau, prior to its integration with confidential Census data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

   i. To transfer to the Census Bureau via secure FTP (File Transfer Protocol) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of WIC for the years 2017-2023, as described in Attachment A.

   ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this Agreement; including active participant definitions, a record layout, record count, and record length.

   iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers will not contain any state data or direct identifiers.

   iv. To allow the Census Bureau staff and Special Sworn Status (SSS) researchers to use the state data at the Processing Sites listed in Section 4 of this Agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this Agreement.

b. The Census Bureau agrees:

   i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this Agreement and only for the projects listed in Attachment B or those approved in writing by both parties.

   ii. To provide the state program agency with a copy of data tabulations that the Census Bureau will create for Census research purposes. Specifically, the Census Bureau will provide the state program agency with data tabulations based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American Community Survey (ACS). Data tabulations shall include estimated rates of program eligibility and access/participation for the state overall and by various demographic, economic, and household characteristics and by county when the data allow. It also will include distributions across the same characteristics both for program participants and for those who are estimated to be eligible but do not participate. The data tabulations will be delivered either within six (6) months from the date that the state administrative records are processed and provided to Census

AMERICAN OVERSIGHT

Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.

iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to WIC and resulting from use under this Agreement of the state data. If no comments are received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this Agreement.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this Agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the Agreement to prevent unauthorized use. The parties mutually agree that the following locations are designated for data processing, analysis, and storage within the Census Network:

Sites: Bowie Computer Center or Other Approved Census Computer Centers
Suitland Federal Center
Federal Statistical Research Data Centers
Census Approved Cloud Services

The parties mutually agree that the following named individuals will be designated as points of contact for the Agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency POC:
Alex Erkenbeck
Data and Evaluation Manager, Nutrition Services Branch
Colorado Department of Public Health
4300 Cherry Creek Dr. South
Denver, CO 80246
(303) 692-2465
alexandria.erkenbeck@state.co.us

Census Bureau POC: Michael Berning
Assistant Division Chief
Data Acquisition and Curation
Economic Reimbursable Surveys Division
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233

AMERICAN OVERSIGHT

(301) 763-2028
michael.a.berning@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This Agreement is effective on the date on which it is signed by both parties. The Agreement will terminate five (5) years following the date on which it becomes effective. If, at the end of five (5) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties will review this Agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the Agreement, **in order to determine whether it should be revised, renewed or canceled.** The review will be conducted by the Census Bureau's Assistant Director for Economic Programs and the state program agency.

Notwithstanding all other provisions of this Agreement, the Parties agree that:

a. This Agreement may be amended at any time by written mutual consent of both parties.

b. Either party may terminate this Agreement upon thirty (30) days written notice to the other party.

To the extent permitted by federal law, the original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3, Terms and Conditions. Any revisions to the data retention timetable after the execution of this Agreement will be stated in writing in an amendment to this Agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this Agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this Agreement.

To promote organizational transparency, and in support of data discovery for current and future research projects, the U.S. Census Bureau posts non-sensitive data documentation to public-facing websites. This documentation, such as a record layout or data dictionary, can include file descriptions, variable lists, variable labels and valid values for each variable.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this Agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty

AMERICAN OVERSIGHT

(30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this Agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this Agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

The Census Bureau will promptly consider and adjudicate, in accordance with Federal law, claims which may arise for damages of any nature arising out of a Census Bureau act under this Agreement. Such adjudication will be pursued under the Federal Tort Claims Act, 28 U.S.C. Section 2671 et seq., the Federal Employees Compensation Act, 5 U.S.C. Section 8101 et seq., or such other legal authority as may be pertinent. The U.S. Department of Justice shall determine the appropriate venues for any litigation arising under this Agreement.

7. CONFIDENTIALITY

A. IT Security

State Statute at section 24-73-101 *et seq.*, C.R.S., protects the confidentiality of the state data that contains personal identifying information, as well as WIC regulations at 7 CFR 246.26(e). The Census Bureau will comply with all federal laws applicable to the privacy or security of data received pursuant to this Agreement. As a federal agency, the Census Bureau is not subject to state laws, however the Census Bureau will comply with the requirements of applicable state laws to the extent that they do not conflict with the Census Bureau's requirements under federal law.

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, United States Code. The data provided under this Agreement are confidential under 13, U.S.C. § 9. Per the Federal Cybersecurity Enhancement Act of 2015, these data are also protected from cybersecurity risks through screening of the systems that transmit the data. Upon receipt, all data acquired as a result of this Agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by

AMERICAN OVERSIGHT

the Department of Commerce Office of the CIO (Chief Information Officer), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 *"Standards for Security Categorization of Federal Information and Information Systems"* and NIST Special Publication 800-60r1 *"Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices."* Security controls and subsequent assessments are to be completed based on the final categorization.

Cloud providers must be approved for at least moderate level information through the GSA FedRAMP process prior to acquiring any services. Census Bureau identifies, assesses and authorizes use based on the published FedRAMP results and an assessment of any Census Bureau (customer provided) controls implemented to protect the infrastructure and data. Security reporting on cloud providers is reported to the Department of Commerce on a regular basis under FISMA.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum M-17-12. Known or suspected losses of protected data are to be reported within one (1) hour of its discovery to the Bureau of the Census Computer Incident Response Team (BOC CIRT) who will report as required to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau becomes aware of a known breach of the State Data, the Census Bureau will contact the state program agency contacts to discuss the actions and potential remedies regarding the incident.

B. Disclosure Avoidance Review of Statistical Products

Title 13, Section 9 of the United States Code (U.S.C.) requires the Census Bureau to keep confidential the information collected from the public under the authority of Title 13. Section 214 of Title 13, U.S.C., and Sections 3551, 3559 and 3571 of Title 18, U.S.C., provide for the imposition of penalties of up to five years in prison and/or up to $250,000.00 in fines for wrongful disclosure of confidential census information.

Disclosure avoidance is the process for protecting the confidentiality of data, as required under Title 13 U.S.C. A disclosure of data occurs when someone can use published statistical information to identify an individual who has provided confidential information under a pledge of confidentiality. For data tabulations, the Census Bureau uses disclosure avoidance procedures to modify or remove the characteristics that put confidential information at risk for disclosure. Although a published table may appear to show information about a specific individual, the Census Bureau has taken steps to disguise or suppress the original data, while making sure the results are still useful. The techniques used by the Census Bureau to protect confidentiality in tabulations vary, depending on the type of data.

Noise infusion is the Census Bureau's preferred disclosure avoidance technique. By policy, noise infusion is applied to all data products that are reported with geographies smaller than a state. Noise infusion may be required for microdata releases, depending on the characteristics of the microdata and the specific variables that are to be released. Data that cannot be publicly released may still be analyzed within the Federal Statistical

AMERICAN OVERSIGHT

Research Data Centers (FSRDCs) by individuals who have Special Sworn Status; the results of such analyses must still go through a disclosure avoidance process prior to being publicly released.

The parties understand that Title 13 confidentiality protection and disclosure avoidance techniques apply to all work described in this Agreement. The disclosure avoidance disclosure methods are defined by the Census Bureau which has the responsibility of carrying out that work. Accordingly, upon completion of the tabulation, the data produced must be reviewed by the Census Bureau to ensure that no identifiable Title 13 data are or may be disclosed. Should the Census Bureau's Disclosure Review Board (DRB) determine that the requested statistical product does or reasonably could result in such disclosure, then the data product will be modified prior to approval for release to the party(ies) to this Agreement. The DRB must approve before a research product can be released to an individual who does not have SSS and a need to know, or moved to a computer not approved for controlled data according to Census' existing policies and procedures.

8. APPROVALS

6/26/19

Kevin Deardorff (Date)
Chief, Economic Reimbursable Surveys Division
U.S. Census Bureau

7/17/19

Heidi Hoffman (Date)
WIC Director, Colorado WIC Program
Colorado Department of Public Health and Enviromment

AMERICAN OVERSIGHT

Attachment A: Data Elements

1. Data Requirements

Monthly data from the administration of WIC for the years 2017-2023 will include, when available:

a. Case unit identifiers,
b. Active Participant definitions,
c. Complete monthly case unit address history (residence, mailing),
d. Monthly Benefits data (any of the available: benefits received date, benefits amount issued/received, and benefit amount redeemed),
e. Income reporting requirement (simplified reporting, change reporting, etc.),
f. Income (monthly),
g. Eligibility and denial information,
h. Identifiers for individuals in case units, and
i. The following information on individuals in a case unit:
    i. Name
    ii. Case unit/main contact phone number
    iii. Relationship to primary recipient
    iv. Recipient or Caretaker phone number
    v. Race
    vi. Hispanic origin/Ethnicity
    vii. Sex
    viii. Date of birth
    ix. Gross income (monthly)
    x. Net Income (monthly)
    xi. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)
    xii. Education
    xiii. Employment

AMERICAN OVERSIGHT

Attachment B: Description of Approved Research Projects

1. **Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records**

   The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

   This project will focus on evaluating and improving the measurement of state programs in the American Community Survey (ACS), the Current Population Survey (CPS) and the Survey of Income and Program Participation (SIPP). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

   This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. **Characterizing WIC participants and likely eligible non-participants of WIC**

   WIC data linked to ACS data can provide characteristic information for women, infants, and children participating in the WIC program. Additionally, infants and children with a high probability of being eligible for WIC can be estimated using ACS information on family structure, reported income, and public assistance.[1] The estimated eligible infants and children can be matched to the administrative WIC data to determine who is estimated to be eligible but not participating in the program, helping agencies determine unmet need. The project results can help state agencies improve outreach efforts. This research helps the Census Bureau better understand their survey and census data.

3. **Improve Census Bureau Record Linkage Methods**

   The Census Bureau's Person Identification Validation System (PVS) uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records. However, coverage for

1 Eligible pregnant and breastfeeding women cannot be identified in ACS data.

AMERICAN OVERSIGHT

some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

A. validating and enhancing the Master Address File (MAF);[2]
B. designing and assigning resources to carry out the 2020 Census;[3]
C. unduplicating public, private, and census lists; and
D. imputing missing data.[4]

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American population and economy. As Census and other Federal Statistical Agencies successfully

2 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.
3 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.
4 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

AMERICAN OVERSIGHT

integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

AMERICAN OVERSIGHT

AMERICAN OVERSIGHT

revised

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM ADMINISTRATIVE DATA
FROM
THE VIRGINIA DEPARTMENT OF SOCIAL SERVICES

Agreement No. 0094-2015-PAY-02

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Virginia Department of Social Services for the acquisition of Supplemental Nutrition Assistance Program (SNAP) Administrative Data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the Virginia Department of Social Services to share SNAP data and enter into this agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026. The Food and Nutrition Act of 2008 limits the use of SNAP recipient information to those directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the SNAP program because Census will provide to the state copies of its tabulations of the data for the state to use in administering its SNAP program.

3. TERMS AND CONDITIONS

Pursuant to this agreement, the Virginia Department of Social Services, hereinafter referred to as "the state program agency", will transfer records to the Census Bureau from the administration of SNAP, hereinafter referred to as "the state data" and as described in Attachment A of this agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. Maintaining confidentiality of these data is guaranteed under Title 13 U.S.C, Section 9, and the Privacy Act of 1974. Only Census Bureau staff and Special Sworn Status (SSS) researchers will have access to the data. Any data, records, or other information shared through this research agreement will be protected from unauthorized disclosure and will be used solely for statistical purposes. When the Census Bureau publicly releases information related to this research, it will not be disclosed in individually-identifiable form and results will

AMERICAN OVERSIGHT

meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state agency agrees:

   i. To transfer to the Census Bureau via secure FTP (File Transfer Protocol) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of SNAP for the years 2009—2016, as described in Attachment A.

   ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, record length and data dictionary.

   iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers will not contain any state data or direct identifiers.

   Research projects exploring whether the administrative records represent the same individuals in survey or census households may need access to name data. Such access would only be granted through approval by the Census Bureau Data Stewardship Executive Policy Committee. Researchers will not have access to Social Security Numbers.

   iv. To allow the Census Bureau staff and Special Sworn Status (SSS) researchers to use the state data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

   i. To grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.

   ii. To provide the state agency, within six (6) months of the receipt of acceptable data quality and acceptable file layouts, selected tabulations of the state data linked to the American Community Survey. These tabulations will describe the demographic and household characteristics of residents who are likely to be eligible for SNAP, but who do not participate in the program.

AMERICAN OVERSIGHT

iii. To allow the state agency the opportunity to review and provide comments, clearance, or rejection of pre-publication copies of any report or other document containing information derived from the state data pertaining to SNAP and resulting from use under this agreement of the state data. If no response is received from the state agency within thirty (30) days from delivery of pre-publication documents to the state agency, the Census Bureau shall send a reminder notice to the state agency. If no response is received within three (3) business days from delivery of the reminder notice, the state agency will be deemed to have approved the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this agreement.

4. CONTACTS

The parties mutually agree that the following named individual is to be designated as custodian of the files on behalf of the Census Bureau and will be personally responsible for the observance of all conditions of use, and for the establishment and maintenance of security arrangements to prevent unauthorized use, as specified in the agreement. The Census Bureau agrees to notify the state agency within fifteen (15) days of any changes of custodianship.

Custodian:
J. Trent Alexander
Data Custodian
U.S. Census Bureau
4600 Silver Hill Road, 2K133
Washington DC 20233
(301) 763-9810
j.trent.alexander@census.gov

Processing Sites:
Bowie Computer Center
Suitland Federal Center
Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the state agency and the Census Bureau, respectively:

State agency POC:
Nikole Cox
SNAP Manager
Virginia Department of Social Services
801 E. Main St. Richmond, VA 23002
(804) 726-7270
Nikole.cox@dss.virginia.gov

AMERICAN OVERSIGHT

Census Bureau POC: Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
U.S. Census Bureau
4600 Silver Hill Road
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. FUNDING

The total amount to be paid by the Census Bureau to the Virginia Department of Social Services via Electronic Funds Transfer (EFT) is $10,000.00. Funding is provided to reimburse the state program agency for resources needed to set up and complete the data extraction as described in Attachment C. This Agreement is considered to be a firm commitment.

6. ACCOUNTING DATA

State Agency Accounting Data:

Agency Location Code: **765**

Appropriation No.:

CAN:

DUNS No.: **015571326**

EIN: **1540959533A2**

Total Amount:

Control Number:

Census Bureau Accounting Data:

Agency Location Code: **13-04-0001**

Project Code: **6410A00Z95**

TAS: **013 2015 2016 0450 000**

Business Event Type Code (BETC): **DISB**

Funds Expiration: **09-30-2016**

Funds Cancellation Date: **09-30-2021**

Organization Code: **11-09-0094-00-00-00-00**

DUNS No.: **929955383**

EIN: **52-0204537**

Total Amount: **$10,000.00**

Agreement No.: **0094-2015-PAY-02**

AMERICAN OVERSIGHT

7. FINANCIAL POINTS OF CONTACT

State Agency Financial Contact:

Michael Gump
Chief Financial Officer
Virginia Department of Social Services
801 East Main Street
(804) 726-7223
michael.gump@dss.virginia.gov

Census Bureau Financial Contact:

Sandi Walters
Division Chief, Finance
U.S. Census Bureau
4600 Silver Hill Road
Washington, DC 20233
(301) 763-9398
Sandi.walters@census.gov

8. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement will terminate five (5) years following the date on which it becomes effective. If, at the end of five (5) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties will review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, **in order to determine whether it should be revised, renewed or canceled.** The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state agency.

Notwithstanding all other provisions of this agreement, the Parties agree that:

a. This agreement may be amended at any time by written mutual consent of both parties.

b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

The parties to this agreement envision that upon expiration or termination of this agreement, that the parties will execute a new agreement permitting the Census Bureau continued use of the state data. For this reason, the original state data will be retained by the Census Bureau after expiration or termination of this agreement, unless the state agency notifies the Census Bureau in writing that the original state data are not to be retained by the Census Bureau past the expiration or termination of this agreement. If, upon expiration or termination of this agreement, the state agency notifies the Census Bureau Point of Contact in writing that the original state data covered by this agreement

AMERICAN OVERSIGHT

are not to be retained by the Census Bureau, the data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

If, upon expiration or termination of this agreement, the Census Bureau retains the original state data, Census Bureau researchers will cease and desist all use of the state data until such time that a new agreement is executed which permits the use of the state data by Census Bureau researchers. The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

9. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

10. CONFIDENTIALITY

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r3 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO (Chief Information Officer), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

AMERICAN OVERSIGHT

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices.*" Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state agency contacts to discuss the actions and potential remedies regarding the incident.

11.APPROVALS

RL 2/19/15

Ron Jarmin (Date)
Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

Robert Earley 2.23.15

Mr. Robert Earley (Date)
Contract Officer
Virginia Department of Social Services

AMERICAN OVERSIGHT

Attachment A: Data Elements

1. Data Requirements

Data from the administration of SNAP for the years 2009—2016 will include, when available:

a. Case unit identifiers,
b. Complete case unit address history,
c. History of benefit amounts received (monthly),
d. Income reporting requirement (simplified reporting, change reporting, etc.),
e. Gross income (monthly),
f. Net income (monthly),
g. Eligibility and denial information,
h. Identifiers for individuals in case units, and
i. The following information on individuals in a case unit:
    i. Name
    ii. Social Security Number
    iii. Relationship to primary recipient
    iv. Race
    v. Hispanic origin/Ethnicity
    vi. Sex
    vii. Date of birth
    viii. Education
    ix. Employment
    x. Monthly income by source (earnings, unearned income, TANF, SSI, SSA, UI, general assistance, other)
    xi. History of membership in case unit
    xii. SNAP program participation status or active status within a case

AMERICAN OVERSIGHT

Attachment B: Description of Approved Research Projects

1. **Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records**

   The U.S. Census Bureau administers multiple household surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

   This project will focus on evaluating and improving the measurement of state programs in the American Community Survey (ACS), the Current Population Survey (CPS) and the Survey of Income and Program Participation (SIPP). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

   This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. **Characterizing likely eligible non-participants of SNAP**

   Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. **Improve Census Bureau Record Linkage Methods**

   The Census Bureau's Person Identification Validation System (PVS) uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records. However, coverage for

AMERICAN OVERSIGHT

some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research and Planning for the 2020 Census

The Census Bureau intends to test and potentially use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau intends to use state program information, along with data from federal, state, and private sources to pursue the following four research initiatives, leading to improvements in quality and efficiency of 2020 Census operations:

A. validating and enhancing the Master Address File (MAF);[1]
B. designing and assigning resources to carry out the 2020 Census;[2]
C. unduplicating public, private, and census lists; and
D. imputing missing data.[3]

Data quality will be explored using 2010 decennial census data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census to assess accuracy based on the level of aggregation.

1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.
2 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.
3 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

AMERICAN OVERSIGHT

Attachment C: Statement of Work Funding SNAP Data Extraction

Statement of Work
for the
U.S. Census Bureau Funding of the Data Extraction by the
Virginia Department of Social Services for
Supplemental Nutrition Assistance Program Administrative Data

Under the referenced MOU [0094-2015-PAY-02] through which the Census Bureau is acquiring Supplemental Nutrition Assistance Program (SNAP) Administrative Data from the Virginia Department of Social Services (VDSS), Census Bureau funding reimburses VDSS efforts to extract SNAP data for the years 2009-2016, by providing funds to complete the following tasks:

Task 1 – Analysis, Design, and Initial File Delivery

Through this task, the Virginia Department of Social Services has agreed to provide SNAP recipient data to the US Census Bureau. This data exists in the DSS Data Warehouse, using a dimensional model. While there is no charge for the data, a considerable amount of design, programming, and testing work is needed to extract the data elements needed by the Census Bureau and create a series of "flat files" for transmission to them. We will extract SNAP case and client details for 2009 through 2013, create a series of files, review the files for accuracy, and provide them to the Census Bureau. This task is expected to be completed by the end of 2014 with delivery of all 2009 – 2013 files.

Task 2 – Delivery of 2014 Data

Through this task, the 2014 data can be provided after CY2014 is complete. This is expected to be completed by mid-February, 2015.

Task 3 – Delivery of 2015 Data

Through this task, the 2015 data can be provided after CY2015 is complete. This is expected to be completed by mid-February, 2016.

Task 4 – Delivery of 2016 Data

Through this task, the 2016 data can be provided after CY2016 is complete. This is expected to be completed by mid-February, 2017.

AMERICAN OVERSIGHT