

Developing A Link Between The Current Population Survey (CPS) and State Food Stamp Program (FSP) Administrative Data

**Phase II Report: Data Development Initiatives for Research on
Food Assistance and Nutrition Programs**

Final Report

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I. OVERVIEW	1
II. BACKGROUND.....	3
A. CURRENT POPULATION SURVEY.....	3
B. FSP ADMINISTRATIVE DATA.....	4
III. INITIATIVE SUMMARY	6
A. ADVANTAGES.....	7
B. LIMITATIONS.....	8
IV. OVERVIEW OF THE IMPLEMENTATION PLAN	9
A. SAMPLE SIZE.....	9
B. POTENTIAL IMPLEMENTATION BARRIERS	9
C. ASSUMPTIONS FOR COST ESTIMATES.....	10
V. DESCRIPTION OF SPECIFIC TASKS	11
A. TASK 1: AGENCY NEGOTIATIONS.....	11
B. TASK 2: TABULATIONS ON MATCHING ELEMENTS.....	13
C. TASK 3: COMPLETE CENSUS PROPOSAL PROCESS	13
D. TASK 4: NEGOTIATE ACCESS TO STATE(S) ADMINISTRATIVE FILES	14
E. TASK 5: ESTABLISH MEMORANDUM OF UNDERSTANDING (MOU) TO ACCESS AND MATCH THE CPS AND FLORIDA FSP DATA.....	15
F. TASK 6: DEVELOP COMPUTER SPACE AT RESEARCH DATA CENTER (RDC)	15
G. TASK 7: EXTRACT AND TRANSFER STATE FSP ADMINISTRATIVE DATA.....	16
H. TASK 8: EXTRACT AND GAIN FAMILIARITY WITH THE STATE ADMINISTRATIVE DATA FILES AT DATA ACCESS CENTER.....	16
I. TASK 9: DETERMINISTICALLY LINK STATE ADMINISTRATIVE FILES TO CPS FILES.....	17
J. TASK 10: ASSESS THE RELIABILITY OF THE MATCH AND DEVELOP FINAL FILES	18
1. Task Alternative: Probabilistic Matching.....	19
K. TASK 11: DATA ACCESS FOR LINKED CPS-FSP FILE.....	20
1. Task Alternative: Data Access for Linked CPS-FSP file and FSP Administrative-only Extract..	20
VI. SUMMARY OF COSTS AND SCHEDULE	22
VII. SUMMARY OF ALTERNATIVE INITIATIVES	24
A. ALTERNATIVE INITIATIVE 1: LINKING MULTIPLE STATES ADMINISTRATIVE FILES	24
B. ALTERNATIVE INITIATIVE 2: LINKING AN ALTERNATIVE CPS FILE.....	25
C. ALTERNATIVE INITIATIVE 3: LINKING POOLED CPS FILES.....	25
D. ALTERNATIVE INITIATIVE 4: LINKING ADDITIONAL STATE PROGRAM DATA	25
E. ALTERNATIVE INITIATIVE 5: LONGITUDINAL SURVEY OF STATE FSP PARTICIPANTS.....	26
VIII. REFERENCES	27
IX. APPENDIX A: DETAILED COST ASSUMPTIONS FOR SPECIFIC TASKS.....	28
A. TASK 1: AGENCY NEGOTIATIONS.....	28
1. USDA Responsibilities.....	28
2. Census Responsibilities.....	28
3. DCF Responsibilities.....	28
B. TASK 2: TABULATIONS ON MATCHING ELEMENTS.....	28
1. USDA Responsibilities.....	28
2. Census Responsibilities.....	28
3. DCF Responsibilities.....	29
C. TASK 3: COMPLETE CENSUS PROPOSAL PROCESS	29

1. USDA Responsibilities.....	29
2. Census Responsibilities.....	29
3. DCF Responsibilities.....	29
D. TASK 4: NEGOTIATE ACCESS TO STATE(S) ADMINISTRATIVE FILES	29
1. USDA Responsibilities.....	29
2. Census Responsibilities.....	29
3. DCF Responsibilities.....	30
E. TASK 5: ESTABLISH MEMORANDUM OF UNDERSTANDING (MOU) TO ACCESS AND MATCH THE CPS AND FLORIDA FSP DATA.....	30
1. USDA Responsibilities.....	30
2. Census Responsibilities.....	30
3. DCF Responsibilities.....	30
F. TASK 6: DEVELOP COMPUTER SPACE AT RESEARCH DATA CENTER (RDC)	30
1. USDA Responsibilities.....	30
2. Census Responsibilities.....	31
3. DCF Responsibilities.....	31
G. TASK 7: EXTRACT AND TRANSFER STATE FSP ADMINISTRATIVE DATA.....	31
1. USDA Responsibilities.....	31
2. Census Responsibilities.....	31
3. DCF Responsibilities.....	31
H. TASK 8: EXTRACT AND GAIN FAMILIARITY WITH THE STATE ADMINISTRATIVE DATA FILES AT DATA ACCESS CENTER.....	31
1. USDA Responsibilities.....	31
2. Census Responsibilities.....	31
3. DCF Responsibilities.....	32
I. TASK 9: DETERMINISTICALLY LINK STATE ADMINISTRATIVE FILES TO CPS FILES.....	32
1. USDA Responsibilities.....	32
2. Census Responsibilities.....	32
3. DCF Responsibilities.....	32
J. TASK 10: ASSESS THE RELIABILITY OF THE MATCH AND DEVELOP FINAL FILES	32
1. USDA Responsibilities.....	32
2. Census Responsibilities.....	33
3. DCF Responsibilities.....	33
K. TASK 11: DATA ACCESS	33
1. USDA Responsibilities.....	33
2. Census Responsibilities.....	33
3. DCF Responsibilities.....	33
X. APPENDIX B: SAMPLE OF MEMORANDUM OF UNDERSTANDING	37

I. OVERVIEW

The purpose of this report is to develop an initiative to link the Current Population Survey (CPS) to state Food Stamp program (FSP) administrative data. This report is a follow-up to Wittenburg, et al. (2001), which included a summary of ten data collection/enhancement initiatives that have the potential to improve the utility and cost-effectiveness of research on federal food assistance and nutrition programs. Economic Research Service (ERS) selected three initiatives from that report for further development. This report, along with Bell (2001) and Kenyon, et al. (2001), provide a specific implementation plan, including potential costs, benefits, and alternative options, for the three initiatives selected by ERS.

A linked CPS-FSP file would create new opportunities to explore dynamic program participation patterns of FSP participants and eligible non-participants. In addition, researchers could use the file to examine data collection and processing issues (e.g., imputation procedures), by comparing CPS survey responses to comparable fields in the administrative records. The resulting file would be accessible on a restricted basis to protect the confidentiality of the data.

Our analysis is based on a literature review and interviews with several experts familiar with data linking issues from the United States Department of Agriculture (USDA), the Census Bureau (Census), Florida Department of Children and Families (DCF) and The Urban Institute. We also conducted a meeting in October 2001 with experts from the Census and USDA to discuss a potential implementation plan. If this initiative does reach the implementation stage, this meeting should provide a foundation for future cross-agency collaborations.

There are several potential options to link the CPS to FSP administrative data. For example, the USDA might want to develop an initiative that matches the March 2000 CPS to three state administrative databases. Alternatively, the USDA may wish to develop other options to match multiple CPS files (e.g., March 2000 and March 2001) to a single administrative data source.

To develop a feasible implementation plan and estimate costs, we examine a potential pilot initiative that includes a linkage of one monthly CPS extract to one large state FSP administrative file.¹ If successful, this initiative should provide concrete research results that will encourage participation by more states and eventual expansion of this effort.

We estimate that this pilot would cost approximately \$194,000. It is important to note that the costs are for illustrative purposes only and depend upon the specific implementation plan chosen by the USDA. For example, the costs could change significantly if additional states are included in the linkage process.

¹ USDA can use the "pilot" analysis to estimate the costs for potential alternatives, including expansions of this initiative to other states. In Section VII, we illustrate costs of several potential alternative options (e.g., linkages to multiple state administrative databases).

We begin by providing background information on the CPS and FSP administrative files, which we use to motivate the proposed linkage (**Section II**). We then describe a specific linkage between the CPS-state FSP administrative records and discuss its advantages and limitations for future research (**Section III**). These sections provide important contextual information that will assist policy makers and researchers in understanding the costs and benefits of the proposed initiative. In the next three sections, we summarize a specific implementation for a pilot initiative. Specifically, we provide an overview of the implementation plan (**Section IV**); outline specific implementation tasks (**Section V**); and summarize an implementation schedule and costs (**Section VI**). These sections provide a roadmap for planning and implementing the pilot initiative. Finally, we conclude with potential alternatives to the proposed data initiative and the costs and benefits associated with these alternatives (**Section VII**). The USDA can use this information to identify potential alternative implementation plans, including expanding the pilot initiative.

II. BACKGROUND

A. Current Population Survey

The CPS is a monthly nationally representative survey of civilian non-institutionalized households conducted by the Census for the Bureau of Labor Statistics (BLS). Each month, interviewers contact households to obtain basic demographic information on all persons within the household, and more detailed labor force information for all persons over the age of 15. Each sample includes approximately 50,000 housing units. The Census selects the sampling units for the CPS to be representative at the state level. Consequently, unlike most surveys, such as the Survey of Income Program Participation (SIPP), researchers can use the CPS to generate estimates at the state level (e.g., unemployment statistics). Supplements are also added to each CPS that collect information on a variety of special topics, including food nutrition.

The Annual Demographic Supplement (March CPS) and the Food Security Supplement (generally occurs in April) are the most commonly used CPS supplements in FSP research.² The March supplement includes detailed information on sources of income (including FSP), which has been used extensively in analyses of FSP participants and non-participants. For example, researchers have used several cross-sections of the March CPS to examine the relationship between various factors (e.g., business cycles, individual characteristics) and FSP participation decisions (Corson and McConnell, 1990; Martini and Allen 1993; Yelowitz, 1995; Castner, 2000). The Food Security Supplement provides data on food spending, sufficiency, security, and program participation information. This supplement is the source of national and state-level statistics on food insecurity and hunger reported by the USDA in its series *Measuring Food Security in the United States* (Economic Research Services, 2001).

While most FSP research using the CPS focuses on the cross-sectional nature of the data, it is possible to develop a longitudinal file by matching households from the across months. The longitudinal files can be creating by using sample overlaps across each month (**Table 1**).³ For example, in March and April of any given year (or any other two consecutive months), 75% of the sample includes respondents in both months. For longer samples, such as one year, 50% of the sample is interviewed in both periods. Because of the nature of the interview process, linkages are not available beyond 16 months. Recently, Mills, et al. (2001) used the longitudinal portion of the CPS to examine exits from the FSP program.

² The 1995, 1997, 1999, and 2001 Food Security supplements were conducted in April. The 1996 and 2000 supplements were conducted in September. The 1998 supplement was conducted in August.

³Specifically, researchers can use the eight rotation group structure to link households across monthly surveys. Each monthly CPS includes eight rotation groups. A rotation group is interviewed for four consecutive months and then, after an eight-month rest period, for another four months a year later. Each month a new rotation group of addresses, or one-eighth of the total sample, is introduced into the CPS. Because the CPS is a household level survey, linking across different CPS months is complex. Specifically, movers are not followed which can create both matching and selection (e.g., movers tends to be disproportionately low-income) issues.

Table 1: Percent of Sample Overlap Across Monthly Current Population Surveys

Months	Overlap with Previous CPS
1	75
2	50
3	25
4-8	0
9	12.5
10	25
11	37.5
12	50
13	37.5
14	25
15	12.5
16 or more	0

(Source: The Census and the Bureau of Labor Statistics, 2000)

B. FSP Administrative Data

Unfortunately, there is no coordinated effort to organize and transform the micro-level information in state FSP administrative databases into a single national database. One major issue is that each state has its own set of protocols to access the administrative databases and, in some states, obtaining this access may involve contacting multiple state agencies (see Wittenburg, et al., 2001 for more details).

Fortunately, in part because of several state program evaluations, many states have created administrative data extracts for research purposes. UC-Data (1999) found over 100 administrative data extracts in a recent survey of 26 states, many of which included FSP administrative records.⁴ Specifically, they found that eighty percent of these states had major external projects or databases in development. They documented linkages between records from the FSP and several other programs, including Temporary Assistance for Needy Families (TANF), Medicaid, Foster Care, Child Care, JOBS, Child Support, and Unemployment Insurance (UI).

The most promising state FSP administrative extracts for this initiative include longitudinal histories of program participation by FSP participants. These files could be linked to the CPS, which would allow researchers to examine changes in FSP participation over multiple periods. The structure of the available administrative files for research differs across states. In general, states may have two types of longitudinal files. The first is a "cohort-specific" file that captures the histories of individuals who were participating in the FSP in a particular month. For example, this file could include the histories of March 2000 FSP participants. The second is a "full history file" that captures individuals who ever participated in the FSP program. Unlike the cohort-specific file,

⁴ Unfortunately, we do not have available full information of other state files not covered by the survey, but we are aware that several other states also have created similar linked databases.

this file could include the histories of FSP participants from multiple periods (e.g., all former and current FSP participants). The second type of file is preferable for the linkage because it contains information on a larger pool of participants (and, hence, provides a large possible sample of linked cases).

Currently, Abt Associates (2001) is examining the potential uses of administrative data for food nutrition and assistance programs from the same 26 states surveyed in the UC-Data study. They are surveying state agencies and school food authorities to inventory their system capabilities, data sharing arrangements, record linkages, and "best practices." Their analysis will include information on FSP, as well as WIC and other child nutrition programs (e.g., School Lunch). They are also testing the feasibility of linking data from multiple food assistance programs in select states.

The findings from the Abt study could significantly enhance this proposed initiative if it identifies the potential to use other state files as a link to CPS records. Of particular relevance will be Abt's summary of characteristics of the nutrition assistance information systems and data sharing agreements within states. Specifically, it will be important to understand the protocols for accessing data from various state systems. For example, the USDA may choose to link administrative data from states that have less cumbersome requirements for data access and usage. In addition, the Abt study may uncover linkages to other food nutrition and assistance programs, such as the Supplemental Nutrition Program for Women, Infants and Children (WIC), that could enhance the amount of information available that could be linked from some states.

III. INITIATIVE SUMMARY

Restricted files of the CPS can be linked to state FSP administrative extracts using unique identifiers that exist on both records, including Social Security Numbers (SSNs), name, and date of birth information. The CPS gathers this information during each monthly interview, but only makes it available in restricted research files. Several state FSP databases include SSN and/or name information to administer benefits and establish links to other programs. Researchers must satisfy specific confidentiality restrictions before using restricted CPS or state FSP administrative files. Because the match will use individual identifiers, information on FSP participation will need to be imputed to the household level. Researchers who use survey data often have to make similar imputations.⁵

Why use the CPS rather than another survey? The CPS has several advantages over other surveys for creating a data linkage to state FSP records. First, most surveys do not collect information on unique identifiers, such as SSNs, that are critical for the linkage (e.g., Panel Survey of Income Dynamics). Second, the CPS includes a large sample that can be used in state level analyses, which is particularly important given that micro-level FSP administrative data are only available at the state level. Third, researchers have used the CPS extensively in past research. Consequently, improving these data should enhance options for future FSP research. Finally, the CPS is an on-going survey planned each month, which provides some flexibility for future data linking projects.

Why use state FSP administrative data? State administrative data are necessary to provide program participation histories on FSP participants. In general, administrative data provide a low cost mechanism for obtaining program histories for FSP participants. Many states track FSP over multiple periods in their databases.

A linked CPS-FSP file would include CPS survey information on demographic, employment, and income characteristics that are linked to lifetime history records on FSP participation from a particular state.⁶ This file would be accessible from a restricted Research Data Center (RDC) (which would most likely be located in Washington, DC) by sworn special agents of the Census and USDA. Researchers would become sworn special agents by filing a proposal to the Census and USDA that ensures the confidentiality of the data.

⁵ This may pose a bigger problem for observing longer term changes in FSP patterns for other household member, particularly if researchers expect major changes in household composition. Unfortunately, we cannot observe household changes in the CPS. Nonetheless, researchers will be able to follow FSP histories for the heads of households (as recorded on the FSP file), but will need to make assumptions on the FSP patterns of other members.

⁶ The file may also include other FSP administrative information, such as benefit amount and income. The general rule in using administrative files is that the variables in these files are only as reliable as their importance for administering the program. For example, past research has found that certain variables, such as education, are very unreliable in many administrative systems because they are not necessary in administering the program

A. Advantages

The combination of survey and FSP administrative records would significantly expand research opportunities beyond that provided by survey or administrative data files alone, particularly in the area of FSP dynamics. The survey information would provide detailed background information on demographic, income, health, and other program characteristics of FSP participants and non-participants. This additional information would address a major limitation of administrative records, which contain very limited background information on individuals. The administrative records would supplement this information by providing lifetime FSP histories for each CPS respondent. These records would address a major limitation of the CPS, which provides a one period "snapshot" of FSP outcomes.

Researchers could use these data to observe detailed transitions of CPS respondents before, during, and after their interviews. While transitions onto FSP can be observed using FSP administrative data alone (e.g., the FSP Quality Control data), the linked survey data allow for the construction of detailed profiles of family characteristics at these transition points on FSP and non-FSP participants. Consequently, the linked data would provide detailed contextual information related to program dynamics unavailable elsewhere.

Researchers could use the linked files to address several questions related to the dynamics of FSP participation, including:

- What are the income and program characteristics of participants who cycle on and off FSP programs in specific states?
- How many eligible FSP non-participants have ever participated in the FSP? If so, are they more likely to participate in recent periods (e.g., past two years)?
- How do long-term FSP participation patterns vary across specific subgroups (e.g., low-income) of participants and non-participants?
- How do FSP participation patterns of CPS respondents vary before, during, and after their interviews?

Researchers could also use these files to assess the reliability of reported program participation in various states, which could be valuable to the Census data collection efforts for the CPS. For example,

- How do self-reported records for FSP differ from administrative records? Are there potential explanations for under-reporting of FSP participation in the CPS?
- Does the CPS adequately sample a representative sample of FSP households based on the information from the administrative records?
- Can the administrative records be used to improve current CPS imputation processes?

Finally, and potentially most importantly, the creation of a matched CPS-FSP file could generate other linked data initiatives, which, by virtue of having access of state

administrative records, would become significantly cheaper. Some natural extensions include:

- *Creation of other Matched Census-FSP data sources:* Other Census data sources could also be linked to state FSP administrative records, including the SIPP, American Community Survey, and the Decennial Census. Each of these data sources also contain the same unique identifiers as the CPS. Presumably, the same agreements developed to match the CPS to FSP records could also applied to these other data sources. These linkages could generate a set of unique research opportunities for both the Census and USDA.⁷
- *Creation of Longitudinal CPS-FSP File:* As mentioned above, researchers could link the publicly available CPS files from several months with the linked data. This linkage would provide multiple months of survey data on labor force attachment (from the survey) and FSP participation (from the administrative records). For example, researchers could use this information to assess questions such as "How do changes in employment status influence FSP participation?"
- *Matched CPS- FSP-SSA Administrative File:* Certain CPS files have already been linked to SSA administrative records on earnings and program participation. In theory, a matched CPS-FSP file could be linked with the existing linked CPS-SSA file. If SSA files become available, it would be a relatively low cost exercise to combine the information from the linked surveys. Unfortunately, obtaining the matched SSA restricted files is problematic because of significant data restrictions on SSA earnings files. Consequently, it is not clear, given the current rules, if this is a viable option.

B. Limitations

There are three important limitations of the linked data. First, detailed characteristics from CPS interviews are only available for a very limited period. Therefore, it is not possible to observe whether certain factors (found in the CPS), such as changes in household composition, influence FSP participation in other periods. Second, the linked administrative files only track program participants while they are participating in the state programs. In one sense, this is not a problem since non-participation is an important outcome in its own right signaled by the lack of inclusion in program files. However, researchers will not be able to distinguish between participants who left the program and those who moved from the state—a problem faced by all prior uses of administrative data and not considered crippling by most researchers. Finally, because the analysis is based on a state match, the sample sizes for specific state respondents could be somewhat limited, especially for small subgroups (e.g., Able-bodied adults). We discuss specific sample size issues in more detail in the next section.

⁷ For example, researchers could use a linkage to the longitudinal survey information from the SIPP records to address questions such as "How do the short-term program patterns observed in the SIPP relate to long-term patterns from the administrative records?"

IV. OVERVIEW OF THE IMPLEMENTATION PLAN

To develop an implementation plan, we focus on a pilot linkage between one monthly CPS extract (**March 2000**) and one state administrative extract (**Florida**). The March 2000 CPS has several advantages for this pilot because it includes recent information on income source; is collected around the same period as other data with strong potential for other data linking projects (e.g., ACS and Decennial Census); and the Census has worked on "verifying" the SSNs that will be used in the match.⁸ While the choice of any given state FSP administrative file is somewhat arbitrary, Florida has several comparable advantages for the match, including a large population of FSP participants; full history file of all FSP participants since 1993; use in previous research projects; and potential links to several other programs (e.g., TANF).

A. Sample Size

Based on our calculations, there should be a sufficient sample size of FSP recipients in the CPS for the linkage, though it could be limited for specific subgroups. In the March 2000 CPS, 145 (unweighted) Florida CPS households (313 recipients) reported receipt of FSP benefits. However, this estimate significantly undercounts the number of potential linked FSP households for two reasons. First, the CPS survey significantly undercounts FSP participation. Consequently, we suspect that some CPS respondents who do not self-report FSP participation will be in the FSP administrative records. Second, and more importantly, the Florida state administrative file includes *all recipients since 1993*. Hence, there should be a large sample of linked records, particularly for participants who were in the FSP just before the passage of welfare reform. For example, the 1996 CPS included 245 Florida FSP households.

B. Potential Implementation Barriers

The two primary implementation barriers, which are common with any data linking project, are legal issues associated in obtaining, processing, and storing confidential data and technical associated in generating a reliable match across separate files. The restricted CPS research files and the state administrative data are both governed by confidentiality agreements that may inhibit the use of the data in one form or another. While many of the confidentiality restrictions across the CPS and state data are likely be similar, special regulations for the administrative or survey data could affect the final linkage. For example, restricted CPS files can only be access at the Census RDCs, which will likely limit the broad usage of these files. The technical issues primarily involve missing, inconsistent, or purged data from either the CPS or state administrative file. If these issues are prevalent in either file, the reliability of the match will be significantly reduced.

⁸ Census has already assessed the reliability of the March 2000 files by cross-checking the CPS data with the Social Security Administration (SSA) files from the Alphadent and the Numident records. The Alphadent files include an alphabetical listing of a person's name and SSN. The Numident files include a list sorted by SSN of names. Both files are used in checking the reliability of the name and address information on the CPS. Presumably, these checks could be in place for other data sources, such as the 2001 March CPS.

C. Assumptions for Cost Estimates

To generate cost estimates, we make assumptions for the activities undertaken by each agency. For ease of illustration, we assume that the costs will be borne by the agency closest to the activity. For example, because the Census houses restricted CPS data, we assume that all costs associated in manipulating the data will be absorbed by the Census.

We assume that three agencies will be involved in the following activities:

- **USDA:** The USDA will coordinate all activities across agencies, including applying for access to use restricted files from the March 2000 CPS and Florida FSP files. The USDA will also assist in developing protocols for future use.
- **Census:** The Census will coordinate the details of the data linkage, which includes obtaining and cleaning the data and performing the statistical match. Because the data matching process is labor intensive, the bulk of the costs fall to the Census.
- **Florida's Department of Children and Families (DCF):** The DCF will provide technical assistance and the data from the state administrative records.

It is important to note that these costs are an estimate. The actual costs of implementation for each agency will depend on the funding available and further agreements across agencies. For example, while the majority of costs described in the next section fall to the Census, these costs could be offset if the USDA provided funds to either the Census or a private contractor to complete the tasks below.

To be consistent with Bell (2001) and Kenyon, et al. (2001), we assume that each agency has three labor categories: Senior Manager, Senior Analyst, and Research Assistant. The Senior Manager category includes experts who have at least ten years of research and/or program experience. The Senior Analyst category includes researchers and programmers who have between three to nine years of research and/or program experience. The Research Assistant category includes individuals with very limited experience. We generate cost estimates for these categories using a list of hourly wage rates from industry averages.⁹ *Appendix A* provides a detailed summary of these wage rates, along with a brief description of the workplan for each task outlined in the next section.

⁹ We developed these industry averages from our original proposal to ERS for this task order.

V. DESCRIPTION OF SPECIFIC TASKS

The following tasks are necessary to develop the March 2000 CPS-Florida FSP linkage:

- Agency Negotiations (**Task 1**);
- Tabulations on Matching Elements (**Task 2**);
- Complete Census Proposal Process (**Task 3**);
- Negotiate Access to State(s) Administrative Files (**Task 4**);
- Establish Memorandum of Understanding (MOU) to Access and Match the CPS and Florida FSP Data (**Task 5**);
- Develop Computer Space at Research Data Center (RDC) (**Task 6**);
- Extract and Transfer State FSP Administrative Data (**Task 7**);
- Extract and Gain Familiarity with the State Administrative Data Files at Data Access Center (**Task 8**);
- Deterministically Link State Administrative Files to CPS Files (**Task 9**);
- Assess the Reliability of the Match and Develop Final Files (**Task 10**);
- Data Access (**Task 11**);

The agency negotiation task (Task 1) represents a planning stage for all of the agencies that will be involved in this initiative. Upon completing these negotiations, the next step is to generate basic tabulations on data elements in the CPS and state administrative files (Task 2). These tabulations will allow the USDA and Census to assess the risks of data linkage (e.g., will we be able to successfully link records? how many records are missing?). The next four tasks (Task 3-6) outline the methodology to obtain access to restricted CPS and state administrative files and to store these files at an RDC. The data processing tasks (Task 7 and 8) highlight the important data manipulations that are necessary to become familiar with the data prior to the actual linkage. The data linkage tasks (Task 9 and 10) provide a description of the methodology to link the files and to assess the reliability of the match. Finally, the data access task (Task 11) builds on the existing agreements outlined in Tasks 3-6 and set up a system that allows restricted access to researchers.

A. Task 1: Agency Negotiations

The most important step in developing a link between the CPS and FSP data will be a set of negotiations between the USDA, Census, and state agency officials that lay the foundation for the data linking process. Our initial meeting at the Census in October 2001 (mentioned above) should provide a foundation for bringing together representatives from the Census and USDA. All participants were very interested in the possibility of creating a data linkage and agreed that further negotiations were necessary if there was enough interest for eventual implementation.

The negotiations under this task will need to address three basic questions:

- Which state data should be linked to the CPS or other Census survey (Question 1)?
- Which methodology should be used to link the data (Question 2)?
- How will the data be accessible (Question 3)?

Because several options exist, it is important for the USDA and Census to identify specific responses to these questions in the upcoming months.

We have made specific assumptions to address these questions. First, we assume that the March 2000 CPS will be linked to Florida's state FSP administrative data (Question 1). We assume that two research files will be created using a deterministic linking process (Question 2). The first will be used to address issues assess the reliability of self-reported questions in the CPS and the second will be used to address research questions related to FSP program dynamics.¹⁰ Finally, we assume that the data will be accessible from a Census RDC (Question 3).¹¹

The USDA can take three discrete steps in preparations for this task. First, using the findings from the Abt (2001) and Hotz, et al. (1999), the USDA can assess which state data files are of most interest for the data linkage, including Florida. We suggest developing a brief memo that summarizes several promising data sources. Second, to gain further background information, it will be critical to conduct teleconference calls with administrative officials in "promising states" to discuss the feasibility of using state data at a Census approved site. Third, the USDA should identify the specific research questions they would like to address with the linked data. Our summary of research questions in Section III should provide some guidance in this area.

We suggest two rounds of meetings. The USDA and Census will conduct the first meeting to identify the most promising data sources and research questions for the match. The USDA will conduct a second meeting with the Census and DCF to identify specific implementation barriers, especially those associated with the legal and technical issues in linking data, and discuss how the data could be accessible on an on-going basis. Based on the results from the meetings, the USDA (and/or another agency) would then decide whether to fund this particular initiative.

Agency	Cost
Census	\$4,448
USDA	\$4,448
DCF	\$2,224
Total Task	\$11,119

¹⁰ In Task 10 below, we discuss the differences between these two files.

¹¹ Unfortunately, based on our discussions with Census, there do not seem to be any alternatives to data access to storing the data at an RDC. However, it is important to note, the memorandum of understanding, described in Task 5 below, will govern how the data can be accessed and used on an on-going basis. Consequently, it is critical that USDA and Census create a strong foundation to ensure that these data can be accessible to address research questions of interest to both agencies.

B. Task 2: Tabulations on Matching Elements

Two potential major issues could significantly reduce the value of the linkage. First, the actual data matching elements (i.e., SSN, name, and date of birth) in the CPS or state administrative records could have several duplicative or missing values. If either file contains missing or incomplete information, the quality of the match will be significantly reduced. Second, the outcome information from the administrative records may include several missing or incomplete values. While the Census can readily assess the survey elements in the CPS files (e.g., race, gender, and income), it would be important to ensure that the Florida program history elements from the state file are also complete.

To minimize the costs of a "poor linkage", we suggest calculating basic tabulations on the matching elements and outcome information in the CPS and administrative data. On the CPS side, tabulations will be necessary for the matching elements to identify the percent of missing and/or duplicate values. On the state side, tabulations will be necessary for the matching elements and the FSP histories.

Researchers and administrators could use this information to weigh the costs and benefits of proceeding with the match. For example, assume that the CPS includes information on 90% of the matching elements, whereas the state data includes information on 80% of the matching elements. Based on this information, we would approximate that 72% of the cases (0.9×0.8) could be matched. The USDA could assess whether this match rate "is reasonable" before committing additional funding to the project. It is possible, for example, that the match rates would be significantly higher using an alternative state database.

We assume that the tabulations for both the CPS and state files are readily available from preexisting projects. Consequently, the costs of this task are relatively low for the Census and DCF.

Agency	Cost
Census	\$1,931
USDA	\$0
DCF	\$1,931
Total Task	\$3,862

C. Task 3: Complete Census Proposal Process

To begin the linkage process, it is necessary to obtain permission to use restricted files of the March 2000 CPS data files, which include essential information on the matching elements (SSN, name, and date of birth). To address the inherent privacy issues, the proposal will need to meet the Census's "Criteria for the Review and Approval of Census Projects that Use Federal Tax Information." These guidelines, (which are summarized at - <http://www.ces.census.gov/download.php?document=50>) require any research project to meet prior approval from the Census. Specifically, the project must meet a host of security controls including physical and computer security safeguards, approved methods

of data transferal, site approval, oversight of personnel using the data, and approved disclosure protections applied to products.

The USDA will develop the proposal to access these files. The Census will incur smaller costs related to reviewing the proposal. Presumably, the USDA and Census will outline a strategy to meet these guidelines during their initial negotiations in Task 1.

Agency	Cost
Census	\$1,779
USDA	\$4,448
DCF	\$0
Total Task	\$6,227

D. Task 4: Negotiate Access to State(s) Administrative Files

The next step is to obtain access to the raw state administrative FSP files from the DCF. The DCF has access to several types of administrative data extracts. In many cases, the FSP extracts can also be linked to other program records. While there are several potential files of interest, the initial linkage will rely on the DCF's longitudinal individual history file, which includes a full program history of any individual who ever participated in a Florida state program since 1993.

The DCF has a formal proposal process that requires researchers to submit a letter asking permission to use the state administrative file. Based on our conversations with the DCF, authorization will require a written request to the Director of Florida's Work And Gain Economic Self-Sufficiency (WAGES) program outlining the specifics of the request and the goals of the research. In general, these goals must illustrate how the research will benefit the state's programs. For example, it is possible that a better understanding of the dynamics of FSP participants and non-participants could inform state outreach efforts.

The USDA will be responsible for writing the letter requesting permission for data access. The DCF will review the letter and process the request. Based on our conversations with the DCF, we anticipate that this proposal process should be relatively straightforward.

Agency	Cost
Census	\$890
USDA	\$4,448
DCF	\$2,669
Total Task	\$8,006

E. Task 5: Establish Memorandum of Understanding (MOU) to Access and Match the CPS and Florida FSP Data

The USDA will summarize the agreements in Tasks 3 and 4 in a MOU. The MOU is a critical component of the data linking exercise because it outlines the provisions that govern data use and access. In short, it represents a summary of the confidentiality agreements established by the Census, DCF, and USDA to use restricted files of the CPS and state administrative records. After the records have been linked, the MOU will also summarize the guidelines that researchers must follow in using the data.

The USDA, with guidance from the Census and DCF, will establish the MOU. The USDA can use a template from previous a MOU between the Census and state agencies as a guideline (see *Appendix B* for a sample MOU).¹²

Agency	Cost
Census	\$8,895
USDA	\$26,686
DCF	\$8,895
Total Task	\$44,476

F. Task 6: Develop Computer Space at Research Data Center (RDC)

After obtaining rights to the restricted CPS and FSP files, the next step is to establish an infrastructure to match and store the data at a Research Data Center (RDC). The Census data programs are confidential, and may be used for statistical purposes only at an RDC by Census employees or by individuals who have obtained special sworn status from the Census. The Census has established RDCs at six sites, though we assume that the primary site to house these data will be at the site in Washington DC.¹³ RDCs include full security systems and access protocols for data access.

The only cost associated with this task is in developing computer space at the RDC for the data linkage and storage. We anticipate that the match will require a mainframe system to handle the large state administrative files. The final matched file could be

¹² Ronald Prevost of Census Bureau provided the template that appears in Appendix B.

¹³ Currently, there are six operating RDCs: Washington, DC (Census Center for Economic Studies), Boston (Boston RDC), Pittsburgh (Carnegie Mellon University), Los Angeles (University of California at Los Angeles), Berkeley (California Census Research Data Center), and Durham (Duke University Triangle RDC). For more information on these RDC, see <http://www.ces.census.gov/ces.php/rdc>.

stored on a secured drive of a personal computer. The Census will establish and monitor this personal computer, including the purchase of any necessary hardware and software to manipulate and store the data.

Agency	Cost
Census	\$32,603
USDA	\$0
DCF	\$0
Total Task	\$32,603

G. Task 7: Extract and Transfer State FSP Administrative Data

The DCF will provide the state FSP history files dating back to January 1993.¹⁴ By linking these files (using a recipient ID common across both files), a full history file can be created that includes identifiers for the match (from the demographic file) and program history information from 1993.

The DCF will assemble the full history file and extract it to a data cartridge to a Census RDC. We expect the file to be quite large based on the large number of FSP participants that exist on the full history file. During the data extraction process, Census programmers may want to conduct site visits to discuss the tape layout with the DCF. The data could be transferred using IBM 3480 data cartridges.

Agency	Cost
Census	\$0
USDA	\$0
DCF	\$1,562
Total Task	\$1,562

H. Task 8: Extract and Gain Familiarity with the State Administrative Data Files at Data Access Center

Because of the intricacies associated in processing state administrative data, it is recommended that Census agents responsible for creating the CPS-Florida FSP linkage become familiar with the state administrative data extracts. Specifically, it will be critical to have a full understanding of the data's historical development, state practices for overwriting, purging, and archiving data, and program rules for the documentation. In addition, it will be important to understand the obstacles that other researchers faced in

¹⁴ Specifically, the FSP history can be linked with the matching elements from the state files by linking Florida's Demographic administrative file to the Individual Eligibility full history file. The Demographic file includes a record for each person who has received public assistance and shows name, SSN, recipient ID, date of birth, race, and gender. The individual eligibility file includes a record for each month for which a person was eligible for public assistance. It includes family number, recipient ID, month, and year.

using previous state extracts, including potential issues related to data integrity (e.g., missing data, duplicative observations).

This check will involve running simple cross tabulations that check for outliers on variables from the state files. The tabulations will be cross-checked with the tabulations from the DCF tape layout.

The Census will be in charge of extracting the data and converting it into a useable format for the data linkage. Specifically, they will extract the state files and transform them into a useable format at the RDC. Florida's state FSP records are in DBS - Fox Pro, which is the database management file used in Florida. These files can be easily converted into a useable ASCII or SAS file using a database conversion program, such as STAT Transfer. The format of the state files will match the format of the restricted access CPS files, which are presumably in SAS format. The DCF will provide technical assistance on specific data elements.

Agency	Cost
Census	\$13,016
USDA	\$0
DCF	\$2,603
Total Task	\$15,619

I. Task 9: Deterministically Link State Administrative Files to CPS Files

The files will be linked using the available matching elements in both the CPS and FSP. The link will start by merging records that have a common SSN in both the CPS and FSP records. FSP state records that were in the CPS will be added to the linked files. FSP records that did not contain a CPS SSN will be excluded from the match. The next stage of the link will use the name and date of birth information to link other files that may have incorrect SSNs in either the CPS or FSP state file. SAS algorithms can manipulate name information into various forms to complete the match.¹⁵

The Census will be in charge of all matching activities associated with this task and will rely on the DCF to provide technical assistance on any state data questions.

Agency	Cost
Census	\$17,464
USDA	\$0
DCF	\$4,448
Total Task	\$21,911

¹⁵ Matches can be made on names that may be misspelled in either the CPS or FSP records by using algorithms that link phonetically similar records.

J. Task 10: Assess the Reliability of the Match and Develop Final Files

Any matching procedure must assess potential problems that arise due to "false links" and "false unlinks." False links and false unlinks arise because of errors in the matching variables. For example, if a transpositional error exists in an SSN on one record, the record will remain unlinked. Alternatively, two people with similar records (e.g., they have the same last name) may be falsely linked.

Most of the methods to adjust for false links and false unlinks depend on the research question being addressed. For example, if researchers are interested in understanding the differences between FSP patterns observed in the CPS and the FSP records, then the matching procedure will likely focus on potential false unlinks. Alternatively, if researchers are primarily interested in understanding the behavior of a representative sample of FSP participants, then either imputation (using FSP information on the FSP and CPS records) or reweighting procedures can be employed to ensure that the population is representative. In addition, some methods may just rely on subjective judgements of the researcher. For example, if the date of birth in the CPS does not match the date of birth in FSP records, it may be preferable to disregard the linkage. Alternatively, researchers may choose to use a more expansive matching algorithm that uses several combinations of a SSN (to adjust for potential transpositional error) or a person's name to increase the number of matches. It is important to note, however, that the subjective choice of the researcher will likely be influenced by the content of the research question.

This task builds on the "first stage" of data linking summarized in Task 9 by generating two research files that serve potentially different purposes. The first linked file will be used by the USDA to examine representative populations of FSP participants in Florida. To assess the representativeness of the file, it will be important to compare the CPS-FSP estimates to available state administrative estimates on the overall size and composition of the FSP caseload. It is likely that reweighting and/or imputation procedures will be necessary to produce a representative sample of FSP participants in the CPS. In addition, separate weights may be necessary to produce representative samples in other years. We assume that a base weight will be created for 2000 and separate weights could be generated in the future.

The second file will be used by the Census to examine differences in FSP reporting in the CPS survey and actual participation patterns in the FSP. Hence, this match will not employ any type of imputation or reweighting procedure based on CPS FSP survey responses. Rather, researchers will use these files to examine differences in reporting across the CPS and administrative data.

The Census will coordinate activities in developing the two research files. The DCF will provide estimates of FSP participant characteristics that will be used by the Census in the benchmarking process.

Agency	Cost
Census	\$24,730
USDA	\$1,302
DCF	\$2,603
Total Task	\$28,635

1. Task Alternative: Probabilistic Matching

An alternative to the approach outlined in Tasks 9 and 10 is a more complex probabilistic matching procedure designed to improve the reliability of the data linkage. Probabilistic record linkage assumes that no exact match between fields common to the source databases will link a person with complete confidence. Instead, probabilistic record linkage calculates the likelihood that two records belong to the same person, by matching together as many pieces of identifying information as possible.

This approach seeks to limit the probability of false links and unlinks in the data matching procedure. The precision of the match improves with the addition of common data elements that uniquely identify each individual. For example, this procedure could use all of the same matching elements described above to generate probabilities of matches.

A major advantage of probabilistic matching is that it allows researchers to use consistent criteria in calculating the probability of the match. Before starting the data linkage, researchers assign "weights" for the probabilistic linkage that place more emphasis on certain direct linkages, such as SSNs, than other variables. Once the data are linked, researchers can evaluate the reliability of the match by examining the probabilities that the records are "exact matches." For example, assume that a record includes a transpositional error in the SSN that precludes an exact match. A probabilistic procedure will calculate the probability that the record should be linked based on the SSN, as well as other identifying information. In a deterministic linkage, the researcher must make a judgement of the reliability of the individual record linkage, and, hence, must reexamine several types of "mismatches." In a probabilistic linkage, however, a researcher can make a decision on the weights to assign for every match and chose to only include matches that have, say, 80 percent likelihood of being a match.¹⁶

The drawback of the methodology is that it is far more costly. For the purposes of illustrating costs, we assume that the Census will develop the algorithms in SAS to conduct the data match.¹⁷ Unlike the deterministic linking process, the algorithms for probabilistic matching tend to be very complicated and labor intensive.

¹⁶ It is important to note, however, that in both the deterministic and probabilistic linkage, a researcher must make some assumptions on the reliability of individual matching elements. Consequently, both data linking processes contain some degree of subjectivity.

¹⁷ Census could also purchase commercial matching software, such as Automatch, for the linkage.

Agency	Cost
Census	\$70,508
USDA	\$0
DCF	\$0
Total Task	\$70,508

K. Task 11: Data Access for Linked CPS-FSP file

The resulting linked files will be accessible at a Census RDC. The rules governing data access and use will be specified in the MOU. Researchers will be able to use these files by submitting a proposal to the Census and USDA that satisfies the guidelines state in the MOU.

The Census will provide on-going support for monitoring the data and ensuring its confidentiality. These responsibilities include monitoring the data and assessing proposals to use the data. The USDA will also provide input on the proposal process. Our cost estimates for the Census and USDA both assume a one-year time frame, though it is likely that these costs will be applicable in future years.

Agency	Cost
Census	\$18,375
USDA	\$2,224
DCF	\$0
Total Task	\$20,599

1. Task Alternative: Data Access for Linked CPS-FSP file and FSP Administrative-only Extract

In addition to storing the linked data file, the USDA may consider storing the administrative extract used to create the linked file. The administrative file could be stored on the same computer as the linked file, though the Census would need to develop a larger platform to store the administrative extracts.

Researchers could use the administrative extract to examine issues that may require much larger sample sizes. For example, an analysis of a particular subgroup, such as elderly FSP participants, using the CPS-FSP file could be limited because there is not a large sample of elderly FSP participants in the CPS. Presumably, researchers could generate a large enough sample of elderly FSP participants using administrative-only information from the state file.

The costs of storing the extra file should be limited to the purchase of additional storage space on a PC.

Agency	Cost
Census	\$3,000
USDA	\$0
DCF	\$0
Total Task	\$3,000

VI. SUMMARY OF COSTS AND SCHEDULE

We estimate that the total cost of the initiative will be \$194,618 (*Table 2*). Not surprisingly, the majority of the costs (\$124,130) fall to the Census for planning, data processing, and data linkage. The costs to the USDA (\$43,554) are primarily for planning the initiative, writing proposals to access the restricted CPS and state administrative files, and summarizing the MOU. Finally, the smallest portion of the costs fall to the DCF (\$26,934) for providing the state administrative files and technical assistance on various tasks. We estimate the initial linkage could be completed in one year. Our cost estimates illustrate on-going access for only one year after the completion of the data linkage.

Table 2: Summary of Estimated Costs by Agency

Agency	Cost
Census	\$124,130
USDA	\$43,554
DCF	\$26,934
Total Task	\$194,618
Note: This table describes the costs of the tasks overseen by each agency. It makes no assumption about the funding source nor about whether the actual work will be conducted by agency staff or contractor.	

The most expensive tasks in developing this initiative involve establishing a framework for starting the data linkage (Task 5 and 6), and the technical aspects of linking the data (Task 9 and 10) (*Table 3*). These tasks address the major legal and technical implementation barriers summarized in Section IV.

Table 3. Summary of Estimated Costs by Task

Task	Duration of Activity	Estimated Cost	Estimated Cost of Alternative
<u>Task 1:</u> Agency Negotiations	Month 1	\$11,119	NA
<u>Task 2</u> Tabulations on Matching Elements	Month 2	\$3,862	NA
<u>Task 3</u> Census Proposal Process	Months 3-4	\$6,227	NA
<u>Task 4</u> Negotiate Access to State(s) Administrative Files	Months 4	\$8,006	NA
<u>Task 5</u> Establish Memo of Understanding (MOU) to Access and Match the CPS and Florida FSP	Months 5-6	\$44,476	NA
<u>Task 6</u> Develop Computer Space at Research Data Center (RDC)	Months 7-8	\$32,603	NA
<u>Task 7</u> Extract and Transfer State FSP Administrative Data	Month 9	\$1,562	NA
<u>Task 8</u> Extract and Gain Familiarity with the State Administrative Data Files at Data Access Center	Months 9-10	\$15,619	NA
<u>Task 9</u> Deterministically Link State Administrative Files to CPS Files	Months 10-11	\$21,911	NA
<u>Task 10</u> Assess the Reliability of the Match and Develop Final Files	Months 11-12	\$28,635	\$70,508
<u>Task 11</u> Data Access	Months 13-24	\$20,599	\$3,000
Total		\$194,618	\$73,508
Note: This table describes the costs of the tasks overseen by each agency. It makes no assumption about the funding source nor about whether the actual work will be conducted by agency staff or contractor.			

VII. SUMMARY OF ALTERNATIVE INITIATIVES

The following initiatives could serve as alternatives to the CPS-Florida initiative described above:

- Linking Multiple States Administrative Files (Alternative Initiative 1);
- Linking an Alternative CPS File (Alternative Initiative 2);
- Linking "Pooled" CPS Files (Alternative Initiative 3);
- Linking Additional State Program Data (Alternative Initiative 4); and
- Longitudinal Survey of State FSP Participants (Alternative Initiative 5)

The first four alternatives represent variations of the proposed link above using additional state FSP data (Alternative 1), alternative or multiple pooled data files from the CPS (Alternatives 2 and 3), or addition program data (e.g., TANF) (Alternative 4). The final initiative (Alternative 5) represents an alternative methodology for collecting dynamic FSP information at the state level.

A. Alternative Initiative 1: Linking Multiple States Administrative Files

One alternative would be to link multiple state administrative extracts, rather than one state, to the CPS file. Researchers could use the multiple state files in cross-state analyses.

The USDA could use several criteria to select administrative files including use in previous data projects, frequency of data update, and linkages to other programs (particularly UI wage records). Several existing databases meet one or more of the above criteria, including California, Illinois, Massachusetts, Texas and Oregon (Hotz, et al., 1998). In each of these states, researchers, contractors, and administrators have developed relationships to use administrative databases on an ongoing basis. Such databases would be a logical starting point for negotiating agreements, given their successful use in previous research projects. In addition, as mentioned above, it is likely that the Abt (2001) study will also identify other very promising states.

The costs of adding more states should expand the costs of all of the tasks above that require accessing and manipulating state administrative data (Tasks 1, 2, 4, 5, 7, 8, 9, and 10). A very rough estimate for an additional state would be to sum costs across these tasks, which total to \$135,190. This estimate illustrates the potential significant costs of adding more states. For example, if eight states are linked to the CPS data, we anticipate that the initiative could cost over one million dollars.¹⁸

¹⁸ An added challenge in linking records across multiple states is that variation may exist across state FSP administrative systems. While federal auditing provides an incentive for each state agency to keep accurate, machine-readable records in administering the FSP, differences across state program rules and

B. Alternative Initiative 2: Linking an Alternative CPS File

A second alternative could be to link an alternative monthly CPS extract to a single state administrative file. One possible alternative file could be the 2001 April CPS, which include the Food Supplement questions. Researchers could use this file to address a slightly different set of research questions than the base initiative. For example, researchers could examine the correlation between reported food insecurity (from the CPS) and long-term FSP participation (from state administrative records). The costs of matching an alternative monthly CPS file should be identical to that proposed in the base task because the issues around data access and processing are roughly similar across all monthly CPS extracts.

C. Alternative Initiative 3: Linking Pooled CPS Files

A potentially more promising option to Alternative Initiative 2 is to link the available state administrative data extracts to several available CPS files. For example, the USDA could propose a link to, say, the March 1999, March 2000, and March 2001 CPS files using the same administrative data extract. The USDA and Census could "pool" the files to increase the sample sizes available for the analysis. This additional linkage could be important for subgroup analyses. For example, researchers could use the pooled files to examine outcomes for, say, the elderly. The costs of matching each additional CPS file should be identical to summarized in Tasks 9 and 10 (approximately \$50,000).

D. Alternative Initiative 4: Linking Additional State Program Data

A fourth alternative is to include administrative data from other state programs such as TANF, Medicaid, Foster Care, Child Care, JOBS, Child Support, and UI wage records, in the data linkage. The DCF data system contains linkages to several files through its Florida Online Recipient Integrated Data Access System (FLORIDA).

administration might have significant consequences on the information record in each state's administrative files. It would be important to understand whether such differences will affect the precision of the probabilistic match, perhaps making matches in some states too unreliable to use, particularly if the administrative importance of certain matching variables, such as the SSN, varies across states. In addition, it would be important to understand the comparability of any data elements *not* used in record matching but available for analysis when linked data are later used in research (e.g., benefit amount, household composition) across FSP administrative databases, particularly those related to FSP eligibility. To better coordinate the data elements used for the matching process for cross-state analyses, Census and USDA will need to develop a standardized method for developing, storing, and updating FSP administrative databases when converting them to research use. This coordination could include designing record formats to facilitate research; developing a variable imputation procedure for any missing fields; standardizing fields from different systems; writing code to summarize and/or delete duplicate records; establishing eligibility links for individuals living in FSP households; and performing final verification checks. The "cleaned" FSP administrative records would then be transferred to a standardized research file for the matching to survey records. The costs of generating this comparison depend upon multiple factors, including the comparability of existing state data systems and rules. Unfortunately, without knowledge of this comparability (or even the possible alternative states), it is difficult to generate even general estimates. We anticipate that the Abt (2001) report, however, will provide significant information on the comparability across state systems that could be important for this specific subtask.

There are two potential advantages of adding additional state program data. First, the additional data will allow the USDA and Census to address more research questions related to cross-program participation. Potentially more importantly, the USDA and Census could use UI wage history records to examine the interaction of work and program participation. Second, other entities, such as the Assistant Secretary of Planning and Evaluation (ASPE), may become interested in the more expansive match and, hence, provide additional funding (and political resources) for the initiative.

The costs of this expansion for Tasks 1 through 7 should be relatively minimal. In Task 1, the USDA may wish to expand the negotiations to other federal agencies, such as ASPE. Because the DCF keeps state program administrative data for other programs, such as TANF, in a centralized location, there should not be an expansion in costs in obtaining other state program administrative extracts. In fact, the costs of obtaining the additional data are relatively small because most states have databases that include links to several programs (UC-Data, 1999).

The costs of processing the data (Task 8), linking the data (Task 9), and assessing the reliability of the match (Task 10) for later tasks would be significantly higher. Presumably, each additional program administrative extract would cost approximately the same amount to process as the FSP extracts.¹⁹ For example, if TANF records are linked, the Census would need to gain familiarity with the TANF program elements, link these elements, and assess whether the linkage “makes sense” in comparison to existing TANF benchmarks from administrative data. Consequently, a rough estimate would be to multiply the costs in each of these tasks (which total \$66,165) by the number of programs that the USDA may add to develop an “adjusted” cost estimate.

The limitation of this alternative initiative over the base initiative is that it may create more “pitfalls” for the data linkage. For example, it may be easier for the USDA and Census to start with a single program pilot and, if successful, extend this pilot to other programs. Therefore, at this early stage, one cost-neutral strategy could be to negotiate access to a broader range of state programs, but focus the initial matching efforts on just the FSP.

E. Alternative Initiative 5: Longitudinal Survey of State FSP Participants

A final alternative, which represents an alternative methodology for obtaining dynamic FSP information from state FSP participants, would be to develop a longitudinal survey of FSP participants and non-participants in a select state. This survey would collect the same type of information that is available in the CPS and FSP administrative records, such as program participation, demographic and income characteristics.

Unfortunately, creating such a survey is very labor intensive and costly. Consequently, the opportunity costs of creating such a survey relative to the base initiative seem to be quite high.

¹⁹ Larger program matches, such as UI wage records, could cost significantly more because the universe of UI wage records is larger than the universe of FSP participants.

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IX. APPENDIX A: DETAILED COST ASSUMPTIONS FOR SPECIFIC TASKS

In this section, we provide a detailed summary of our assumptions used to generate cost estimates presented in Sections V and VI. A summary of costs by organization and labor category appears in *Appendix Tables 1 and 2*.

A. Task 1: Agency Negotiations

1. USDA Responsibilities

The USDA will meet with the Census to discuss data and research objectives. In an additional meeting, the USDA will then meet with the Census and DCF to discuss implementation barriers.

Estimated time requirements - 40 hours of Senior Manager time.

2. Census Responsibilities

The Census will meet with the USDA to discuss data and research objectives. They will also discuss implementation barriers during a second meeting with the USDA and DCF.

Estimated time requirements - 40 hours of Senior Manager time.

3. DCF Responsibilities

The DCF will meet with the USDA and Census to discuss implementation barriers.

Estimated time requirements - 20 hours of Senior Manager time.

B. Task 2: Tabulations on Matching Elements

1. USDA Responsibilities

None.

2. Census Responsibilities

The Census will generate tabulations of the CPS data to validate the integrity of key linking variables. Probable choices for these variables include name, Social Security Number, and date of birth. The tabulations will test for invalid entries, duplicates and missing values.

Estimated time requirements - 16 hours of Senior Analyst time to produce tabulations and 8 hours of senior research time to review results.

3. DCF Responsibilities

The DCF will produce similar tabulations of the linking variables using the state data. In addition, the DCF will produce summary statistics on the program history information.

Estimated time requirements - 16 hours of Senior Analyst time to produce tabulations and 8 hours of senior research time to review results.

C. Task 3: Complete Census Proposal Process

1. USDA Responsibilities

The USDA will compose the request for permission to the Census to gain access to CPS files. The USDA will also respond to any comments by the Census on the initial proposal.

Estimated time requirements - 40 hours of Senior Manager time to prepare the letter of proposal and respond to comments.

2. Census Responsibilities

The Census will review the letter of proposal from the USDA and provide comments for revision.

Estimated time requirements - 16 hours of senior time to review the letter from the USDA and provide comments.

3. DCF Responsibilities

None.

D. Task 4: Negotiate Access to State(s) Administrative Files

1. USDA Responsibilities

The USDA will be responsible for writing a letter requesting permission for access to the state data. The letter will outline the specifics of the request and the goals of the research.

Estimated time requirements - 40 hours of Senior Manager time to compose the letter and respond to comments.

2. Census Responsibilities

The Census will be responsible for providing technical input describing the data requirements for the match and the benefits of the linkage.

Estimated time requirements - 8 hours of Senior Manager time to provide technical assistance to USDA.

3. DCF Responsibilities

The DCF will review the letter and propose revisions.

Estimated time requirements - 24 hours of senior time to review the letter and propose revisions.

E. Task 5: Establish Memorandum of Understanding (MOU) to Access and Match the CPS and Florida FSP Data

1. USDA Responsibilities

The MOU will outline any confidentiality restrictions placed on the data by the Census, the state agency or USDA. The USDA will use a sample outline to generate an initial MOU and work with the Census and DCF in crafting a final MOU.

Estimated time requirements - 240 hours of Senior Manager time to produce the MOU and respond to suggested revisions.

2. Census Responsibilities

The Census will be responsible for providing input to the USDA describing the confidentiality policies related to the CPS data.

Estimated time requirements - 80 hours of Senior Manager time to provide input into the composition of the MOU and comment on subsequent revisions.

3. DCF Responsibilities

The DCF will be responsible for providing input to the USDA regarding the confidentiality policies related to state data.

Estimated time requirements - 80 hours of Senior Manager time to provide input on the composition of the MOU and comment on subsequent revisions.

F. Task 6: Develop Computer Space at Research Data Center (RDC)

1. USDA Responsibilities

None.

2. Census Responsibilities

Because the 2001 March CPS file is relatively small, computer storage should not be an issue for these files. However, the state file may be quite large and, hence, may require a larger storage facility such as a mainframe. For the purposes of the Florida match, however, we assume that the data can fit on the hard drive of the PC.

Estimated time requirements - 40 hours of Senior Analyst time to set up the computer system.

3. DCF Responsibilities

None.

G. Task 7: Extract and Transfer State FSP Administrative Data

1. USDA Responsibilities

None.

2. Census Responsibilities

None.

3. DCF Responsibilities

The DCF will translate the data into the agreed upon format (ASCII, SAS Export, etc.), transfer it to the agreed upon medium (CD, Tape, FTP file) and transfer the data to the Census.

Estimated time requirement - 24 hours of Senior Analyst time.

H. Task 8: Extract and Gain Familiarity with the State Administrative Data Files at Data Access Center

1. USDA Responsibilities

None.

2. Census Responsibilities

The Census will transfer the data to a readable format and begin producing tabulations. The Census will communicate with the DCF on any potential issues related to missing or problematic data entries.

Estimated time requirements - 200 hours of Senior Analyst time to convert and explore the data.

3. DCF Responsibilities

The DCF will provide technical assistance to the Census. This will likely entail providing a number of general data tabulations for comparison and answering any questions.

Estimated time requirements - 40 hours of Senior Analyst time to provide technical support.

I. Task 9: Deterministically Link State Administrative Files to CPS Files

1. USDA Responsibilities

None.

2. Census Responsibilities

The Census will conduct an initial linkage between the CPS and FSP records using the matching elements.

Estimated time requirements - 40 hours of Senior Manager time will be necessary to oversee the matching process. 160 hours of Senior Analyst time will be necessary to program the match and check for outliers.

3. DCF Responsibilities

The DCF will provide technical support for the data.

Estimated time requirements - 40 hours of Senior Analyst time to advise the Census on any potential data issues.

J. Task 10: Assess the Reliability of the Match and Develop Final Files

1. USDA Responsibilities

The USDA will provide technical input on creating the file to examine dynamic FSP patterns in the state of Florida. This input may include suggestions on weighting and imputation procedures.

Estimated time requirements - 20 hours of Senior Manager time to monitor the data assessment activities and provide any necessary input on the reweighting or imputation process.

2. Census Responsibilities

The Census will coordinate activities in developing the two linked research files. To assess the representativeness of the file, the Census will compare the CPS-FSP estimates to the available state administrative estimates on the overall size and composition of the FSP caseload. It is likely that reweighting and/or imputation procedures will be necessary to produce a representative sample of FSP participants in the CPS. The second file will be used by the Census to examine differences in FSP reporting in the CPS survey and actual participation patterns in the FSP. Hence, this match will not employ any type of imputation or reweighting procedure based on CPS FSP survey responses. Rather, the Census will use these files to examine differences in reporting across the CPS and administrative data. The Census will examine differences in FSP reporting in the CPS survey and actual participation patterns in the FSP.

Estimated time requirements - 80 hours of Senior Manager time to coordinate the activities of the data assessment, including outlining any reweighting and/or imputation procedures. 300 hours of Senior Analyst time will be necessary to manipulate each file and implement any necessary reweighting suggested by the Senior Manager.

3. DCF Responsibilities

The DCF will provide estimates of FSP participant characteristics that will be used by the Census in the benchmarking process.

Estimated time requirements - 40 hours of Senior Analyst time.

K. Task 11: Data Access

1. USDA Responsibilities

The USDA will provide input on the proposal process.

Estimated time requirements - 20 hours of Senior Manager time.

2. Census Responsibilities

The Census will provide on-going support for monitoring the data and ensuring its confidentiality.

Estimated time requirements - 500 hours of Research Assistant time.

3. DCF Responsibilities

None.

Appendix Table 1: Summary of Costs

	Task 1: Agency Negotiations			Task 2: Tabulations on Matching Elements			Task 3: Complete Census Proposal Process		
	Labor Costs	Non-Labor Costs	All Costs	Labor Costs	Non-Labor Costs	All Costs	Labor Costs	Non-Labor Costs	All Costs
	USDA	\$4,448	\$0	\$4,448	\$0	\$0	\$0	\$0	\$0
	DCF	\$2,224	\$0	\$2,224	\$1,931	\$0	\$1,931	\$0	\$0
	Census	\$4,448	\$0	\$4,448	\$1,931	\$0	\$1,931	\$1,779	\$0
Task Total	\$11,119	\$0	\$11,119	\$3,862	\$0	\$3,862	\$6,227	\$0	\$6,227
Task 4: Negotiate Access to State(s) Administrative Files				Task 5: Establish Memo of Understanding (MOU) to Access and Match The CPS and Florida FSP Data			Task 6: Develop Computer Space at Research Data Center (RDC)		
	Labor Costs	Non-Labor Costs	All Costs	Labor Costs	Non-Labor Costs	All Costs	Labor Costs	Non-Labor Costs	All Costs
USDA	\$4,448	\$0	\$4,448	\$26,686	\$0	\$26,686	\$0	\$0	\$0
DCF	\$2,669	\$0	\$2,669	\$8,895	\$0	\$8,895	\$0	\$0	\$0
Census	\$890	\$0	\$890	\$8,895	\$0	\$8,895	\$2,603	\$30,000	\$32,603
Task Total	\$8,006	\$0	\$8,006	\$44,476	\$0	\$44,476	\$2,603	\$30,000	\$32,603
Task 7: Extract and Transfer State FSP Administrative Data				Task 8: Extract and Gain Familiarity with the State Administrative Data Files at Data Access Center			Task 9: Deterministically Link State Administrative Files to CPS Files		
	Labor Costs	Non-Labor Costs	All Costs	Labor Costs	Non-Labor Costs	All Costs	Labor Costs	Non-Labor Costs	All Costs
USDA	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
DCF	\$1,562	\$0	\$1,562	\$2,603	\$0	\$2,603	\$4,448	\$0	\$4,448
Census	\$0	\$0	\$0	\$13,016	\$0	\$13,016	\$17,464	\$0	\$17,464
Task Total	\$1,562	\$0	\$1,562	\$15,619	\$0	\$15,619	\$21,911	\$0	\$21,911
Task 10: Assess the Reliability of the Match and Develop Final Files				Task 11: Data Access			Total: All Tasks		
	Labor Costs	Non-Labor Costs		Labor Costs	Non-Labor Costs	All Costs	Labor Costs	Non-Labor Costs	All Costs
USDA	\$1,302	\$0	\$1,302	\$2,224	\$0	\$2,224	\$43,554	\$0	\$43,554
DCF	\$2,603	\$0	\$2,603	\$0	\$0	\$0	\$26,934	\$0	\$26,934
Census	\$24,730	\$0	\$24,730	\$18,375	\$0	\$18,375	\$94,130	\$30,000	\$124,130
Task Total	\$28,635	\$0	\$28,635	\$20,599	\$0	\$20,599	\$164,618	\$30,000	\$194,618

Appendix Table 2: Detailed Costs

USDA

Labor Categories	Assumed Rates	Task 1: Agency Negotiations		Task 2: Tabulations on Matching Elements		Task 3: Complete Census Proposal Process		Task 4: Negotiate Access to State(s) Administrative Files		Task 5: Establish Memo of Understanding (MOU) to Access and Match The CPS and Florida FSP Data		Task 6: Develop Computer Space at Research Data Center (RDC)	
		Total Hours	Total Dollars	Total Hours	Total Dollars	Total Hours	Total Dollars	Total Hours	Total Dollars	Total Hours	Total Dollars	Total Hours	Total Dollars
Senior Management	\$111.19	40	\$4,448	0	\$0	40	\$4,448	40	\$4,448	240	\$26,686	0	\$0
Sr Analysts/Sr Programmer	\$65.08		\$0	0	\$0	0	\$0	0	\$0	0	\$0	0	\$0
Research Assist./Jr. Programmer	\$36.75		\$0	0	\$0	0	\$0	0	\$0	0	\$0	0	\$0
TOTAL LABOR		40	\$4,448	0	\$0	40	\$4,448	40	\$4,448	240	\$26,686	0	\$0
Non-Labor Costs													
Travel			\$0		\$0		\$0		\$0		\$0		\$0
Computer			\$0		\$0		\$0		\$0		\$0		\$0
TOTAL Non-Labor Costs			\$0		\$0		\$0		\$0		\$0		\$0

DCF

Labor Categories	Assumed Rates	Task 1: Agency Negotiations		Task 2: Tabulations on Matching Elements		Task 3: Complete Census Proposal Process		Task 4: Negotiate Access to State(s) Administrative Files		Task 5: Establish Memo of Understanding (MOU) to Access and Match The CPS and Florida FSP Data		Task 6: Develop Computer Space at Research Data Center (RDC)	
		Total Hours	Total Dollars	Total Hours	Total Dollars	Total Hours	Total Dollars	Total Hours	Total Dollars	Total Hours	Total Dollars	Total Hours	Total Dollars
Senior Management	\$111.19	20	\$2,224	8	\$890	0	\$0	24	\$2,669	80	\$8,895	0	\$0
Sr Analysts/Sr Programmer	\$65.08		\$0	16	\$1,041	0	\$0	0	\$0	0	\$0	0	\$0
Research Assist./Jr. Programmer	\$36.75		\$0	0	\$0	0	\$0	0	\$0	0	\$0	0	\$0
TOTAL		20	\$2,224	24	\$1,931	0	\$0	24	\$2,669	80	\$8,895	0	\$0
Non-Labor Costs													
Travel			\$0		\$0		\$0		\$0		\$0		\$0
Computer			\$0		\$0		\$0		\$0		\$0		\$0
TOTAL Non-Labor Costs			\$0		\$0		\$0		\$0		\$0		\$0

Census

Labor Categories	Assumed Rates	Task 1: Agency Negotiations		Task 2: Tabulations on Matching Elements		Task 3: Complete Census Proposal Process		Task 4: Negotiate Access to State(s) Administrative Files		Task 5: Establish Memo of Understanding (MOU) to Access and Match The CPS and Florida FSP Data		Task 6: Develop Computer Space at Research Data Center (RDC)	
		Total Hours	Total Dollars	Total Hours	Total Dollars	Total Hours	Total Dollars	Total Hours	Total Dollars	Total Hours	Total Dollars	Total Hours	Total Dollars
Senior Management	\$111.19	40	\$4,448	8	\$890	16	\$1,779	8	\$890	80	\$8,895	0	\$0
Sr Analysts/Sr Programmer	\$65.08		\$0	16	\$1,041	0	\$0	0	\$0	0	\$0	40	\$2,603
Research Assist./Jr. Programmer	\$36.75		\$0	0	\$0	0	\$0	0	\$0	0	\$0	0	\$0
TOTAL LABOR		40	\$4,448	24	\$1,931	16	\$1,779	8	\$890	80	\$8,895	40	\$2,603
Non-Labor Costs													
Travel			\$0		\$0		\$0		\$0		\$0		\$0
Computer			\$0		\$0		\$0		\$0		\$0		\$30,000
TOTAL Non-Labor Costs			\$0		\$0		\$0		\$0		\$0		\$30,000

Appendix Table 2: Detailed Costs (Continued)

USDA

Labor Categories	Assumed Rates	Task 7: Extract and Transfer State FSP Administrative Data		Task 8: Extract and Gain Familiarity with the State Administrative Data Files at Data Access Center		Task 9: Deterministically Link State Administrative Files to CPS Files		Task 10: Assess the Reliability of the Match and Develop Final Files		Task 11: Data Access	
		Total Hours	Total Dollars	Total Hours	Total Dollars	Total Hours	Total Dollars	Total Hours	Total Dollars	Total Hours	Total Dollars
Senior Management	\$111.19	0	\$0	0	\$0	0	\$0	0	\$0	20	\$2,224
Sr Analysts/Sr Programmer	\$65.08	0	\$0	0	\$0	0	\$0	20	\$1,302	0	\$0
Research Assist./Jr. Programmer	\$36.75	0	\$0	0	\$0	0	\$0	0	\$0	0	\$0
TOTAL LABOR		0	\$0	0	\$0	0	\$0	20	\$1,302	20	\$2,224
Non-Labor Costs											
Travel			\$0		\$0		\$0		\$0		\$0
Computer			\$0		\$0		\$0		\$0		\$0
TOTAL Non-Labor Costs			\$0		\$0		\$0		\$0		\$0

DCF

Labor Categories	Assumed Rates	Task 7: Extract and Transfer State FSP Administrative Data		Task 8: Extract and Gain Familiarity with the State Administrative Data Files at Data Access Center		Task 9: Deterministically Link State Administrative Files to CPS Files		Task 10: Assess the Reliability of the Match and Develop Final Files		Task 11: Data Access	
		Total Hours	Total Dollars	Total Hours	Total Dollars	Total Hours	Total Dollars	Total Hours	Total Dollars	Total Hours	Total Dollars
Senior Management	\$111.19	0	\$0	0	\$0	40	\$4,448	0	\$0	0	\$0
Sr Analysts/Sr Programmer	\$65.08	24	\$1,562	40	\$2,603	0	\$0	40	\$2,603	0	\$0
Research Assist./Jr. Programmer	\$36.75	0	\$0	0	\$0	0	\$0	0	\$0	0	\$0
TOTAL		24	\$1,562	40	\$2,603	40	\$4,448	40	\$2,603	0	\$0
Non-Labor Costs											
Travel			\$0		\$0		\$0		\$0		\$0
Computer			\$0		\$0		\$0		\$0		\$0
TOTAL Non-Labor Costs			\$0		\$0		\$0		\$0		\$0

Census

Labor Categories	Assumed Rates	Task 7: Extract and Transfer State FSP Administrative Data		Task 8: Extract and Gain Familiarity with the State Administrative Data Files at Data Access Center		Task 9: Deterministically Link State Administrative Files to CPS Files		Task 10: Assess the Reliability of the Match and Develop Final Files		Task 11: Data Access	
		Total Hours	Total Dollars	Total Hours	Total Dollars	Total Hours	Total Dollars	Total Hours	Total Dollars	Total Hours	Total Dollars
Senior Management	\$111.19	0	\$0	0	\$0	40	\$4,448	0	\$0	0	\$0
Sr Analysts/Sr Programmer	\$65.08	0	\$0	200	\$13,016	200	\$13,016	380	\$24,730	0	\$0
Research Assist./Jr. Programmer	\$36.75	0	\$0	0	\$0	0	\$0	0	\$0	500	\$18,375
TOTAL LABOR		0	\$0	200	\$13,016	240	\$17,464	380	\$24,730	500	\$18,375
Non-Labor Costs											
Travel			\$0		\$0		\$0		\$0		\$0
Computer			\$0		\$0		\$0		\$0		\$0
TOTAL Non-Labor Costs			\$0		\$0		\$0		\$0		\$0

X. APPENDIX B: SAMPLE OF MEMORANDUM OF UNDERSTANDING

State MOU Template Information Page

There are three easy steps to the completion of this document.

STEP 1. Make Standard Changes to the Template

List of variables for search and replace functions in MS-Word (in BLUE).

I.A Formal name of State Agency:

Where state is: Abc

(example format: ABC DEPARTMENT OF ECONOMIC SECURITY)

STATE AGENCY NAME

I.B Commonly used acronym for that State Agency:

Where State Agency is: ABC DEPARTMENT OF ECONOMIC SECURITY

(example format: ADES)

ST ABB

I.C State Statutes that authorize this Agreement:

Where state is: Abc

(example format: Abc Statutes Section 123.45(a)1, 678.90 and Chapter 12.....) *As many as you require*

STATE STATUTES

I.D Effective Date of the Agreement (example format: October 19, 2001)

BEGIN DATE

I.E Termination Date of the Agreement (example format: September 18, 2011)

Note -- these are 10 year agreements.

END DATE

I.F State statutes that control data access and use

STATE USE STATUTE

I.G Date of this agreement (example format: October 19, 2001)

AGR DATE

I.H Present calendar year for the annual access certification listing (example format: 2001)

CY CERT DATE

I.I Latest calendar year of data currently available (example format: 2000)

LATEST DATA

STEP 2. Provide State Contact and Signatory Information

Please fill in information in Section 5 (page 2 of the agreement) and Section 20 (page 9 of the agreement).

STEP 3. Completion of the Agreement

3.A If all the terms of this agreement are amenable, then submit the **unsigned** agreement to your contact at the U.S. Bureau of the Census.

3.B. If you wish to change a specific term or condition of this agreement please suggest the language change (highlighted in the text of the agreement) and discuss this change with your contact at the U.S. Bureau of the Census. We will work closely with you to assure the suggested changes are agreeable to both parties.

3.C. After the completion of either step 3A or 3B, the U.S. Bureau of the Census will sign copies of the agreement and

FEDEX to you for your signature. Please keep one copy for your records and return the other copies of the agreement to the Census Bureau

DATA USE AGREEMENT

AGREEMENT BETWEEN THE [STATE AGENCY NAME \(ST ABB\)](#) AND THE BUREAU OF THE CENSUS FOR USE OF CONFIDENTIAL ST ABB ADMINISTRATIVE RECORDS

In order to ensure the integrity, security, and confidentiality of information maintained by the ST ABB and to permit appropriate disclosure and use of such data as permitted by law, the ST ABB and the Bureau of the Census enter into this agreement to comply with the following specific paragraphs.

Once data are transmitted to the Bureau of the Census, these data become a part of the Bureau of the Census system of records, to be established under the Privacy Act. As such, these records are subject to all requirements and conditions of the Privacy Act.

1. This Agreement is by and between the ST ABB and the Bureau of the Census, a component of the U.S. Department of Commerce, hereafter termed “User.” This Agreement shall begin on [BEGIN DATE](#) and end on [END DATE](#).
2. This Agreement addresses the conditions under which the ST ABB will disclose and the User will obtain and use the ST ABB data files specified in item 7. The terms of this Agreement can be changed only by a written modification to this Agreement, signed by both parties, or by the parties adopting a new agreement. The parties agree further that instructions or interpretations issued to the User concerning this Agreement or the data specified herein, shall not be valid unless issued in writing by the ST ABB point of contact specified in item 5 or the ST ABB signatory to the Agreement shown in item 20.
3. The Census Bureau’s access to the data files is authorized under Title 13, United States Code, Section 6 and the confidentiality of the ST ABB data is guaranteed under Title 13, United States Code, Section 9; Federal Regulations 7 CFR 272.8(a), 42 CFR 431.300F, 45 CFR 205.50, 45 CFR 303.21; and the BLS Commissioner's Order No. 3-93 provided in Attachment E. Only sworn Census Bureau employees will have access to the data files. The ST ABB shall make the specified information available to the Census Bureau pursuant to [STATE USE STATUTE](#).
4. The parties mutually agree that the following named individual is designated as “Custodian” of the files on behalf of the User and will be personally responsible for the observance of all conditions of use and for establishment and maintenance of security arrangements as specified in the Agreement to prevent unauthorized use. The User agrees to notify the ST ABB within fifteen (15) days of any changes of custodianship. The parties mutually agree that the ST ABB may disapprove the appointment of a custodian or may require the appointment of a new custodian at any time.

Custodian: Charlene Leggieri, Assistant Division Chief
Administrative Records Research
Bureau of the Census
4301 Suitland Road
Room 1103 - Bldg. 2
Suitland, MD 20746
(301) 457-8111 charlene.a.leggieri@census.gov

Processing Sites: Bowie Computer Center, Bowie, MD
Suitland Federal Reservation, Suitland, MD
Washington Plaza Building, Upper Marlboro, MD
Census Research Data Centers
Regional Offices
Cornell University remote site

5. The parties mutually agree that the following named individual will be designated as point of contact for the Agreement on behalf of the **ST ABB**.

(Name of Contact)

(Title/Component)

(Mail Stop)

(City/State/Zip Code)

(Phone No. Including Area Code and E-Mail Address, If Applicable)

6. The User represents and warrants and, in furnishing the data files specified in item 7, the ST ABB relies upon such representation and warranty that such data files will be used solely for the following purposes:

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 database called the Longitudinal Employer - Household Dynamics (LEHD) Database. The goal is to develop optimal combinations of administrative record file information based on data accuracy, timeliness, and availability.

This research will provide important data to support the Master Address File Program, current demographic and economic survey and census operations, the Intercensal Estimates Program population and housing estimates, and related census and survey program evaluations.

When the ST ABB data are received by the Census Bureau they become protected under the Privacy Act as well as subject to the provisions of [STATE STATUTES](#). The Census Bureau will then perform a series of data edits to assure the consistency between the Unemployment Insurance and ES-202 records. The User will conduct this statistical operation without any use of, or comingling with, Title 13 protected data files. Finally, these records will achieve Title 13 protected status when they are linked to selected Census Bureau surveys, including the Current Population Survey, the Survey of Income and Program Participation, the Survey of Program Dynamics, the American Community Survey, Economic Censuses, Annual Economic Surveys and to other administrative record sources. These records will generate complete and comprehensive individual data records that will be used to create an LEHD system of records for research and evaluation purposes. Within the system of records, data variables are identifiable by file source solely for research and evaluation purposes.

Within six months of receipt of the [ST ABB](#) data identified in item 7, the User shall provide [ST ABB](#) with the following products:

- a. A copy of the edited wage records before matching with any Title 13 or Title 26 employer record data, and tabulations by county and industry of these edits. Edited wage record files contain state-provided Unemployment Insurance records edited and imputed without the benefit of Title 13 data to improve quality. The User will modify records on these files when SSNs have been identified as incorrect through longitudinal analysis of firm level reporting patterns evident solely in [ST ABB](#) data. Additionally, firm level reporting anomalies identified within the [ST ABB](#) data may produce missing earnings data. The User will impute earnings data for records that meet these criteria. The [ST ABB](#) may only use edited wage records for statistical purposes.
- b. Estimates of employment dynamics by county, age, and gender, for each year for which data is supplied, subject to Census Bureau disclosure review, showing
 - workforce levels
 - accessions
 - separations
 - average earnings
 - job creation
 - job destruction.

The User agrees to explore the expansion of statistics described in 6b to include aggregate information on race and ethnicity. The User will report these research results to the [ST ABB](#) on a periodic basis. If the User and the [ST ABB](#) agree that accurate statistics can be developed for race and ethnicity, then said statistics will be provided to the ST ABB subject to Census Bureau disclosure review.

The User agrees that when the [ST ABB](#) Base Wage or ES-202 employer data elements, matched with Census data records, are requested by researchers under terms of access agreements with Census Research Data Centers (CRDC), [ST ABB](#) advance approval shall be required before release of the [ST ABB](#) data to the CRDC. The User understands that such approval may be granted only when the research project proposal is consistent with [STATE STATUTES](#). The User further agrees to suppress identifiers from all files shared with the CRDC, including Social Security Account number, worker name, employer account numbers, employer names, and employer addresses.

The User represents and warrants further that, except as specified in the Attachment A to this Agreement or except as the [ST ABB](#) shall authorize in writing, the User 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. The User agrees that within the User organization, access to the original data covered by this Agreement shall be limited to the minimum number of individuals necessary to achieve the purpose stated in this section.

7. The [ST ABB](#) shall prepare and forward to the User, on CD-ROM the following specific data files and updates as mutually agreed upon:
 - Unemployment Insurance (UI) Wage Records 1990-[LATEST DATA](#), as available
 - ES202 records 1990-[LATEST DATA](#), as available.

Data elements included on these files are provided in Attachment C and Attachment D which are standard file layouts. Notwithstanding any other provisions of this agreement, the wage records and employer records shall be treated in a manner that will assure that individually identifiable data will be used only for statistical purposes and will be accessible only to authorized persons. Refer to Attachment E, items 6b and 8d, for the definition of "statistical purposes" and Special Sworn Status Individuals".

8. The parties mutually agree that the aforesaid files, and any derivative files that continue identification of individuals and/or business entities, may be retained by the User for 10 years after receipt . The User agrees to notify the [ST ABB](#) within 30 days of the completion of the purpose specified in item 6 if the purpose is completed before this aforementioned retention period. Upon such notice or end of the above-mentioned retention date, whichever occurs sooner, the User will either return all

data files to the [ST ABB](#) at the User's expense or to destroy such data. If the User destroys the data, the User agrees to certify the destruction of the files in writing within 30 days of receiving the [ST ABB](#)'s instructions. A statement certifying this action must be sent to the [ST ABB](#). If the data is returned, the User agrees to return all files to the [ST ABB](#) within 30 days of receiving notice to that effect. The User agrees that no data from the [ST ABB](#) records, or any parts thereof, shall be retained when the aforementioned files are returned or destroyed unless authorization in writing for the retention of such files has been received from the point of contact as identified in item 5 of this Agreement. The User acknowledges that stringent adherence to the aforementioned retention period is required, and that the User shall ask the [ST ABB](#) for instructions under this paragraph if instructions have not been received within 30 days after the retention period ends.

The extended retention period of 10 years is requested in order to allow for research and development of longitudinal modeling techniques and survey validation associated with the creation of small area (tract and block) estimates of housing units, population and their characteristics for the American Community Surveys. Aggregate statistics modeled from records provided by the [ST ABB](#) and other agencies will be applied to the Census survey controls and coverage improvement statistics for the frame.

9. The User agrees to establish appropriate administrative, technical, and physical safeguards to protect the confidentiality of the data supplied by [ST ABB](#) and to prevent unauthorized use or access to it. The safeguards shall provide a level and scope of security that is not less than the level and scope of security established by the Office of Management and Budget (OMB) in OMB Circular No. A-130, Appendix III, Security of Federal Automated Information Systems, which sets forth guidelines for security plans for automated information systems in Federal agencies. The User acknowledges that the use of unsecured telecommunications, including the Internet, to transmit individually identifiable or deducible information derived from the file(s) specified in item 7 is prohibited. Further, the User agrees that the data must not be physically moved or transmitted in any way from the site(s) indicated in item 4 without written approval from the [ST ABB](#).

The Bureau of the Census maintains computer facilities located in secured buildings at the Bowie Computer Center, in Bowie, Maryland and secured facilities at Census Headquarters on the Suitland Federal Reservation in Suitland, Maryland and Washington Plaza in Upper Marlboro, Maryland, Census Research Data Centers, Regional Offices and a remote site at Cornell University. The computer systems that will store the data received from the [ST ABB](#) are located in all sites.

Access to the Bowie facility is controlled by a security guard and electronic card key access. Access to the Suitland and Washington Plaza facilities is controlled by security guards and key access. Controls on the computers are outlined in sensitive security plans (CEN001, CEN002, CEN038, and CEN039), currently being updated. Access to the computer databases is strictly limited to authorized individuals for the uses described above.

The Bowie Computer Center is connected to Census Headquarters and Washington Plaza via

dedicated OC-3 encrypted ATM circuits. Data are encrypted during transmission. Data stored on the computer systems in the Bowie Computer Center are accessed over these lines by analysts and programmers at Census Headquarters. Access controls on all the computers include individual accounts with unique passwords as well as Access Control Lists.

Census Bureau computer systems follow the requirements of the Computer Security Act of 1997. This includes conforming to the standards and scope of security established in OMB Circular A-130, Appendix III, which establishes computer security plans for sensitive systems using the U.S. Department of Commerce "Guidelines for Developing and Evaluating Security Plans for Sensitive and Classified Systems (February 1992)," and meeting the "Department of Defense Trusted Computer System Evaluation Criteria standards, which are C-2 compliant." (Source: Census Bureau Security Office.)

Notwithstanding the preceding paragraph or other provisions of this agreement, the User understands and agrees to the following provisions:

- a. In publicly releasing information, no individual entity shall be identified.
 - b. The [ST ABB](#) shall be allowed to review any publication, report, and other documents, which contain summaries or aggregations of [ST ABB](#) data, five working days prior to publication and/or distribution to others outside of the authorized staff under this agreement.
 - c. Prior to the handling of the [ST ABB](#) data, an [ST ABB](#) confidentiality statement will be completed by the supervisor of all authorized personnel who will be handling the [ST ABB](#) data in accordance with this Data Use Agreement. See Attachment A and Attachment B. The originals of the confidentiality statements are to be maintained by the User and copies are to be forwarded to the [ST ABB](#) point of contact for this agreement identified in item 5 of this agreement, prior to the disclosure of [ST ABB](#)'s confidential information and annually thereafter. These original confidentiality statements shall be made available to [ST ABB](#) personnel during on-site reviews.
10. The User agrees that the authorized representatives of the [ST ABB](#) will be granted access to premises where the aforesaid files are kept for the purpose of inspecting security arrangements to confirm whether the User is in compliance with the security requirements specified in paragraph 9.
 11. The User and [ST ABB](#) further agree that the User will provide full Title 13 confidentiality protection to identities of individuals and businesses in all the items derived from the files noted in item 7, except for data files identified in item 6a that will be protected by the User under the Privacy Act, until they are returned to the [ST ABB](#). The User agrees to allow the [ST ABB](#) the ability to verify that findings, listings, information derived, or any combination of data extracted or derived from the [ST ABB](#) files properly protects the identities of individuals and business entities according to the standards applicable to Title 13 data.

12. The inclusion of linkage of specific files in this Data Use Agreement approved in accordance with item 6 is considered express written authorization from the [ST ABB](#). In this particular instance, the linkage of the original [ST ABB](#) data files is approved by the [ST ABB](#) per the paragraph below.

The linkage of the [ST ABB](#) administrative records to other administrative record sources, censuses and surveys are essential to the Census Bureau's administrative records research, evaluation, and modeling activities. To generate the system of records, the Census Bureau will link the [ST ABB](#) data to data obtained from the Social Security Administration, and possibly to other administrative record sources. See item 6 for additional information related to linkage of administrative record data.

13. The User understands and agrees not to extend the scope of use of the original data files beyond the uses described herein without prior written approval from the point of contact for this agreement as identified in item 5 herein. The [ST ABB](#) acknowledges that derivative products that no longer contain [ST ABB](#) data items are not covered by this prohibition.
14. The User agrees that in the event the [ST ABB](#) determines or has a reasonable belief that the User has made or may have made disclosure of the aforesaid file(s) without authorization by the Agreement or other written authorization from the point of contact for this agreement as identified in item 5 herein, the [ST ABB](#) in its sole discretion may require the User to: (a) promptly investigate and report to the [ST ABB](#) the User's determinations regarding any alleged or actual unauthorized disclosure; (b) promptly resolve any problems identified by the investigation; (c) submit a formal response to an allegation of unauthorized disclosure; (d) submit a corrective action plan with steps designed to prevent any future unauthorized disclosures; and (e) return data file(s) to the [ST ABB](#). The User understands that, as a result of the [ST ABB](#)'s determination or reasonable belief that unauthorized disclosures have taken place, the [ST ABB](#) may refuse to release further [ST ABB](#) data to the User for a period of time to be determined by the [ST ABB](#) or may unilaterally and immediately terminate this agreement.
15. The User hereby acknowledges that criminal penalties under Section 1106(a) of the Social Security Act (42 U.S.C. Section 1306(a)), including a fine not exceeding \$1,000 or by imprisonment not exceeding 1 year, or both, may apply with respect to any disclosure of information in the file(s) specified in item 7 that is inconsistent with the terms of this Agreement. The User further acknowledges that criminal penalties under the Privacy Act (5 U.S.C. Section 552a (1) and (3)) may apply, if it is determined that the Requestor or Custodian, or any individual employed or affiliated therewith, knowingly and willfully obtained the file(s) under false pretense. Any person found guilty under the Privacy Act shall be guilty of a misdemeanor and fined not more than \$5,000. Further, the User acknowledges that criminal penalties may be imposed under 18 U.S.C. Section 641, which provides that if it is determined that the User, or any individual employed or affiliated therewith, has taken or converted to his own use data file(s) or received the file(s) knowing that they

were stolen or converted, they shall be fined not more than \$250,000 or imprisoned not more than 5 years, or both. In addition, the User and any individual employed or affiliated therewith, may be subject to civil suit under the Privacy Act for damages which occur as a result of willful or intentional actions which violate an individual's rights under the Privacy Act.

Notwithstanding all other provisions of this agreement, the User understands and agrees to the following provisions:

- 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.
16. By signing this Agreement, the User agrees to abide by all provisions set out in this Agreement for protection of the data file(s) specified in item 7, and acknowledges having received notice of potential criminal, administrative, or civil penalties for violation of the terms of the Agreement.
17. On behalf of the User, the undersigned individual hereby attests that he or she is authorized to enter into this Agreement and agrees to all the terms specified herein.

Ruth Ann Killion, Chief, Planning, Research, and Evaluation Division
(Name and Title of Individual - Typed or Printed)

(Signature)

(Date)

18. The Custodian, as named in paragraph 4, hereby acknowledges his/her appointment as Custodian of the aforesaid file(s) on behalf of the User, and agrees personally and in a representative capacity to comply with all of the provisions of this Agreement on behalf of the User.

Charlene Leggieri, Assistant Division Chief, Administrative Records Research
(Typed or Printed Name and Title of Custodian of File(s))

(Signature)

(Date)

19. On behalf of the Bureau of the Census, the undersigned individual hereby acknowledges that the aforesaid Federal agency sponsors or otherwise supports the User's request for and use of the **ST ABB** data, agrees to support the **ST ABB** in ensuring that the User maintains and uses the **ST ABB**'s data in accordance with the terms of this Agreement, and agrees further to make no statement to the User concerning the interpretation of the terms of this Agreement and to refer all questions of such interpretation or compliance with the terms of this Agreement to the **ST ABB** officials named in item 20 (or to his or her successor).

Cynthia Z.F. Clark, Associate Director for Methodology and Standards
(Typed or Printed Name and Title of Federal Representative)

(Signature)

(Date)

(301) 457-2106 cynthia.z.f.clark@census.gov
(Phone No. Including Area Code and E-Mail Address, If Applicable)

20. On behalf of the **ST ABB**, the undersigned individual hereby attests that he or she is authorized to enter into the Agreement and agrees to all the terms specified herein.

(Typed or Printed Name and Title of the **ST ABB** Representative)

(Signature)

(Date)

ST ABB CONFIDENTIALITY STATEMENT

All U.S. Department of Commerce, Bureau of the Census division and office chiefs who have employees who may access **ST ABB** information in the course of their duties must inform the employees officially about the legal requirements to safeguard the data and the restrictions on access and use of the individual records.

To accomplish this, we have prepared the following information that you or your designee should personally present to these employees. You should also provide these employees with a copy of your current contract language describing permitted uses. Each employee's immediate supervisor should sign the Certification Form (Attachment B) indicating that all employees listed (including those with Special Sworn Status) were provided time to read this memorandum and given information regarding the data they may access and the specific uses that are permitted. **DO NOT HAVE EMPLOYEES SIGN THE FORM!** Return the Certification Form to the **ST ABB** point of contact (identified in item #5) prior to the beginning of work and annually thereafter.

I understand that while performing my official duties I may have access to **ST ABB** information that is classified as either confidential or sensitive. Confidential information is information which identifies an individual or an employing unit. Sensitive information may be financial or operational information that requires the maintenance of its integrity and assurance of its accuracy and completeness. Confidential and sensitive information are not open to the public. Special precautions are necessary to protect these types of information from unauthorized access, use, modification, disclosure, and destruction.

I agree to protect the following types of **ST ABB information:**

- Client information (such as, information about job seekers, unemployment insurance and/or disability insurance claimants, recipients of public social services, participants of state/federal programs, employers, etc.)
- Wage earner information
- Information about how automated systems are accessed and operate.
- Any other proprietary information.
- Labor Market Information

I agree to protect **ST ABB confidential and sensitive information by:**

- Accessing or using confidential and/or sensitive information only for the purposes specified in the Memorandum Of Understanding between the **U. S. Department of Commerce, Bureau of the Census and **ST ABB** dated **AGR DATE**.**
- Never accessing or using confidential and/or sensitive information out of curiosity, or for

personal interest or advantage.

- Never showing, discussing, or disclosing confidential and/or sensitive information to or with anyone who does not have the legal authority or the “need to know”.
- Storing confidential and/or sensitive information in a place physically secure from access by unauthorized persons.
- Never removing confidential and/or sensitive information from the work area without authorization.
- Disposing [ST ABB](#) confidential and/or sensitive information by utilizing an approved method of destruction, which includes: shredding, burning, or certified or witnessed destruction. Never disposing such information in the wastebaskets or recycle bins.

Penalties:

Unauthorized access, use, modification, disclosure, or destruction is strictly prohibited by state and federal laws. The penalties for unauthorized access, use, modification, disclosure, or destruction may include disciplinary action and/or criminal or civil action.

Title 13, United States Code, Section 9, requires that all information furnished to the Census Bureau for its programs must be held confidential and not released in any form that would allow the identification of an establishment or individual. Title 13, United States Code, Section 214, allows for a fine of not more than \$250,000 and/or imprisonment of not more than five years for violation of this provision.

Computer activities may be monitored. Anyone using automated systems expressly consents to such monitoring.

Annual ST ABB Data Access Certification Listing

Unit:	Longitudinal Employer-Household Dynamics Program, Demographic Surveys Division U.S. Census Bureau, U.S. Department of Commerce
Reporting Year:	CY CERT DATE
Date:	AGR DATE

List names of employees who access ST ABB data and check the employment relationship they have to your organization.

	Status			
	Census Employee	SSS Individual	IPA	Contractor
Supervisor				
Ronald Prevost	X			
Personnel				
John Abowd			X	
Julia Lane				X
John Haltiwanger		X		
Elizabeth Gilliland	X			
Paul Lengermann	X			
Cyr Linonis	X			
Kevin McKinney	X			
Nicole Nestoriak	X			
Lee Kristin Sandusky	X			
Martha Stinson	X			
Bryce Stephens	X			
Lars Vilhuber				X
Frederick Anderssen		X		
Gary Benedetto		X		
Bahattin Buyuksahin		X		
Cheryl Grimm		X		
Simon Woodcock		X		

Your signature certifies that the above listing of names (no employee signature required) includes all individuals under your supervision (including those with Special Sworn Status) who may access ST ABB information in the course of their duties during calendar year CY CERT DATE. It also certifies that each individual has been given the opportunity to read the "ST ABB Confidentiality Statement" and received information regarding the data they may access and a copy of the contract language describing permitted uses.

Signature of Supervisor

Date

Annual ST ABB Data Access Certification Listing

Unit:	Planning, Research, and Evaluation Division U.S. Census Bureau, U.S. Department of Commerce			
Reporting Year:	CY CERT DATE			
Date:	AGR DATE			
List names of employees who access ST ABB data and check the employment relationship they have to your organization.				
	Status			
	Census Employee	SSS Individual	IPA	Contractor
Supervisor				
James Farber	X			
Vickie Kee	X			
Personnel				
Matt Falkenstein	X			
Harley Heimovitz				X
Jeong Kim	X			
Robert Jeffery				X
Daniella Mungo	X			
Nancy Osbourne	X			
Dean Resnick				X
Kevin M. Shaw	X			
Dianne Simmons	X			
Norman Kaplan	X			
William Rohde				X
Debbie Wagner	X			
<p><i>Your signature certifies that the above listing of names (no employee signature required) includes all individuals under your supervision (including those with Special Sworn Status) who may access ST ABB information in the course of their duties during calendar year CY CERT DATE. It also certifies that each individual has been given the opportunity to read the "ST ABB Confidentiality Statement" and received information regarding the data they may access and a copy of the contract language describing permitted uses.</i></p>				
<i>Signature of Supervisor</i>		<i>Date</i>		

LEHD UI-Wage File Format

Note: Round to the nearest dollar; do not include decimals or fractions in fields containing dollars.

LEHD Data Elements			
Position	Data Element	Length	Data Specification
1-9	Social Security Number	9	A 9-digit code indicating each worker's Social Security Number. Do not include hyphens.
10-24	Reference Worker's First Name	15	The first name of the reference worker, if known. Left justify, blank fill.
25	Reference Worker's Middle Initial	1	The middle name of the reference worker, if known. Left justify, blank fill.
26-45	Reference Worker's Last Name	20	The last name (surname) of the reference worker, if known. Left justify, blank fill.
46-47	Reference State	2	The 2-digit State FIPS code indicating the location of the establishment. (See http://129.6.13.40:80/fipspubs/codes/states.htm)
48-57	UI Account Number	10	The Unemployment Insurance (UI) account number assigned to the employer by the State. Right justify, zero fill.
58-62	Reporting Unit Number	5	The number assigned by the State to distinguish between records with the same UI account number. Right justify, zero fill.
63-71	Employer Identification Number (EIN)	9	The 9-digit EIN assigned to the employer by the Internal Revenue Service (IRS). Numeric, right justified. If EIN is unknown, zero fill.
72-75	Reference Year	4	Enter the four digits of the calendar year covered by the report.
76	Reference Quarter	1	The 1-digit number indicating the reference calendar quarter for the report. The calendar quarters are: 1 = January - March 2 = April - June 3 = July - September 4 = October - December

77-86	Quarterly Wages	10	The total amount of wages (both taxable and non-taxable) paid to employees during the entire reference quarter that are subject to Unemployment Insurance taxes. The wages for all worksites should match the wages paid that are reported on that States' Quarterly Contribution Report. Must be numeric (no \$ signs or commas). Must be right-justified and filled with leading zeros. Round to the nearest dollar (Omit cents). If no wages were paid, zero fill.
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LEHD ES-202 File Format

Data elements highlighted in blue, are common to both LEHD and MWR.

Note: Round to the nearest dollar; do not include decimals or fractions in fields containing dollars.

LEHD Data Elements			
Position	Data Element	Length	Data Specification
1-2	Program Code	2	A 2-digit program code indicating the type of data being reported. 01 = CES 02 = MWR 03 = LEHD
3	MEEI	1	A 1-digit number indicating the whether the record is for a single or multi-unit establishment. 1 = Single unit 2 = Multi-unit 3 = Physical location 4 = Multi-unit refusal 5 = County subunit 6 = Small Multi-unit (less than 10 employees) treated as a single unit
4-5	Reference State	2	The 2-digit State FIPS code indicating the location of the establishment. (See http://129.6.13.40:80/fipspubs/co-codes/states.htm)
6-15	UI Account Number	10	The Unemployment Insurance (UI) account number assigned to the employer by the State. Right justify, zero fill.
16-20	Reporting Unit Number	5	The number assigned by the State to distinguish between records with the same UI account number. Right justify, zero fill.
21-29	Employer Identification Number (EIN)	9	The 9-digit EIN assigned to the employer by the Internal Revenue Service (IRS). Numeric, right justified. If EIN is unknown, zero fill.
30-64	Trade Name	35	The division or subsidiary name of the establishment. "Mom's Restaurant" is an example of a trade name of ABC Enterprises. Left justify, blank fill.
65-99	Physical Location Street	35	The physical street address of the establishment. Abbreviate as necessary in accordance with the U.S.

	Address Line 1		Postal Service's National Zip Code and Postal Service Directory. Left justify, blank fill.
100-134	Physical Location Street Address Line 2	35	The physical street address of the establishment. Abbreviate as necessary in accordance with the U.S. Postal Service's National Zip Code and Postal Service Directory. Left justify, blank fill.
135-164	Physical Location City	30	The city of the establishment. Left justify, blank fill.
165-166	Physical Location State	2	The standard 2-letter Postal Service State abbreviation for the establishment. (See http://www.framed.usps.com/ncsc/lookups/usps_abbreviations.htm#states).
167-171	Physical Location Zip Code	5	The 5-digit Zip Code used by the Postal Service for the establishment. If blank zero fill.
172-175	Physical Location Expanded Zip Code	4	The 4-digit expanded Zip Code used by the Postal Service for the establishment. If not used, zero fill.
176	Address Type Code	1	Type of address available for establishment. 1 = Physical Address 2 = Mailing Address 3 = Headquarters 4 = Unknown or unverified
177	Coverage Type Code	1	Type of Coverage for establishment record. If source is QUI then leave this field blank If source is EQUI then use the following codes: 0 = Experience Rated 1 = Reimbursable 2 = Employee Taxable 3 = Employee Reimbursable 8 = Non Covered (non-subject) 9 = Federal Employer
178-179	Primary Comment Code	2	Enter one of the standard 2-digit comment codes from Appendix A if data values differ substantially from previously reported data. If not used, blank fill.
180-181	Secondary Comment Code	2	Enter one of the standard 2-digit comment codes from Appendix A if data values differ substantially from previously reported data. If not used, blank fill.
182-183	Third Comment	2	Enter one of the standard 2-digit comment codes from

	Code		Appendix A if data values differ substantially from previously reported data. If not used, blank fill.
184-187	Reference Year	4	Enter the four digits of the calendar year covered by the report.
188	Reference Quarter	1	The 1-digit number indicating the reference calendar quarter for the report. The calendar quarters are: 1 = January - March 2 = April - June 3 = July - September 4 = October - December
189-223	Legal Name	35	The legal or corporate name of the establishment. For example "ABC Enterprises" or "Smith Companies, Inc." Left justify, blank fill. If same as Trade Name, blank fill.
224-258	Worksite Description	35	Enter a meaningful, unique description of the establishment, such as store number or plant name (e.g., Store 101, Jones River Plant). Left justify, blank fill.
259-264	Month 1 Employment	6	The number of all full- and part-time employees who worked during or received pay(subject to UI wages) for the pay period which includes the 12th of the month . The employment for all worksites should match the employment that is reported on that States' Quarterly Contribution Report. Right-justify, zero fill.
265	Month 1 Indicator Code	1	" " = Reported by employer A = Estimated from CES C = Changed (i.e., re-reported) D = From a missing data notice response E = Estimated (using BLS algorithms) H = Hand estimated (vs. machine generated estimates based on BLS algorithms) L = Late reported (overrides an earlier estimate) M = Missing N = Zero data under review for long term delinquency P = Prorated from master to work site R = Reported (same as blank: typically single accounts show R whereas multiunit work sites are blank) S = Sums work sites for master W = Estimated from wage record count X = Converted to zeroes from non-numeric input
266-271	Month 2	6	The number of all full- and part-time employees who

	Employment		worked during or received pay(subject to UI wages) for the pay period which includes the 12th of the month . The employment for all worksites should match the employment that is reported on that States' Quarterly Contribution Report. Right-justify, zero fill.
272	Month 2 Indicator Code	1	" " = Reported by employer A = Estimated from CES C = Changed (i.e., re-reported) D = From a missing data notice response E = Estimated (using BLS algorithms) H = Hand estimated (vs. machine generated estimates based on BLS algorithms) L = Late reported (overrides an earlier estimate) M = Missing N = Zero data under review for long term delinquency P = Prorated from master to work site R = Reported (same as blank: typically single accounts show R whereas multiunit work sites are blank) S = Sums work sites for master W = Estimated from wage record count X = Converted to zeroes from non-numeric input
273-278	Month 3 Employment	6	The number of all full- and part-time employees who worked during or received pay(subject to UI wages) for the pay period which includes the 12th of the month . The employment for all worksites should match the employment that is reported on that States' Quarterly Contribution Report. Right-justify, zero fill.
279	Month 3 Indicator Code	1	" " = Reported by employer A = Estimated from CES C = Changed (i.e., re-reported) D = From a missing data notice response E = Estimated (using BLS algorithms) H = Hand estimated (vs. machine generated estimates based on BLS algorithms) L = Late reported (overrides an earlier estimate) M = Missing N = Zero data under review for long term delinquency P = Prorated from master to work site

			<p>R = Reported (same as blank: typically single accounts show R whereas multiunit work sites are blank)</p> <p>S = Sums work sites for master</p> <p>W = Estimated from wage record count</p> <p>X = Converted to zeroes from non-numeric input</p>
280-290	Quarterly Wages	11	<p>The total amount of wages (both taxable and non-taxable) paid to employees during the entire reference quarter that are subject to Unemployment Insurance taxes. The wages for all worksites should match the wages paid that are reported on that States' Quarterly Contribution Report. Must be numeric (no \$ signs or commas). Must be right-justified and filled with leading zeros. Round to the nearest dollar (Omit cents). If no wages were paid, zero fill.</p>
291	Quarterly Wages Indicator Code	1	<p>" " = Reported by employer</p> <p>A = Estimated from CES</p> <p>C = Changed (i.e., re-reported)</p> <p>D = From a missing data notice response</p> <p>E = Estimated (using BLS algorithms)</p> <p>H = Hand estimated (vs. machine generated estimates based on BLS algorithms)</p> <p>L = Late reported (overrides an earlier estimate)</p> <p>M = Missing</p> <p>N = Zero data under review for long term delinquency</p> <p>P = Prorated from master to work site</p> <p>R = Reported (same as blank: typically single accounts show R whereas multiunit work sites are blank)</p> <p>S = Sums work sites for master</p> <p>W = Estimated from wage record count</p> <p>X = Converted to zeroes from non-numeric input</p>
292-348	Comments	57	<p>Explain any large changes in employment or wages due to store closure, layoffs, bonuses, seasonal changes, etc. If any units of your firm are being reported for the first time following expansion of operations or purchase of units from another firm, please provide a description of the business activity(s) that will be conducted at each establishment. This will assist BLS in assigning industrial classification codes to the new unit(s). In addition, if units were purchased from another firm, please provide the</p>

			name of the firm, the effective date of the transaction, and the UI number of the seller, if known. If units have been sold to another firm, please provide the name of the firm, the effective date of the transaction, and the UI number of the purchaser, if known. Left justify, blank fill.
349-352	Employer Year of Account Registration	4	Initial liability date, if known. Year is Y2K compliant Blank fill.
353-354	Employer Month of Account Registration	2	Initial liability date, if known. Blank fill.
355-358	Employer Year of Account Termination	4	Most recent end of liability date (year), if drawn from EQUI. Year is Y2K compliant Blank fill.
359-360	Employer Month of Account Termination	2	Most recent end of liability date (month), if drawn from EQUI. Blank fill.
361-364	Employer Year of Account Reactivation	4	Most recent reactivation date (year), resulting in an active status code unless an even later end-of-liability date is present. Year is Y2K compliant Blank fill.
365-366	Employer Month of Account Reactivation	2	Most recent reactivation date (year), resulting in an active status code unless an even later end-of-liability date is present. Blank fill.
367	EQUI Status Code	1	1 = Active 2 = Inactive 3 = Pending future activation
368-370	Reference County	3	The 3-digit County FIPS code indicating the location of the establishment. (See http://129.6.13.40:80/fipspubs/co-codes/states.htm)
371-373	Telephone Area Code	3	Telephone number area code (three digits), if known. Blank fill
374-380	Telephone Number	7	Telephone number (including the exchange and last four digits), if known. No hyphens, blank fill.
381-415	UI-Tax Mailing Address Line 1	35	The mailing street address of the establishment. Abbreviate as necessary in accordance with the U.S. Postal Service's National Zip Code and Postal Service Directory. (From EQUI). Left justify, blank fill.
416-450	UI-Tax Mailing Address Line 2	35	The mailing street address of the establishment. Abbreviate as necessary in accordance with the U.S. Postal Service's National Zip Code and Postal Service

			Directory. (From EQUI). Left justify, blank fill.
451-480	UI-Tax Mailing City	30	The city mailing address of the establishment. (From EQUI). Left justify, blank fill.
481-482	UI-Tax Mailing State	2	The standard 2-letter Postal Service State abbreviation for the establishment. . (From EQUI). (See http://www.framed.usps.com/ncsc/lookups/usps_abbreviations.htm#states).
483-487	UI-Tax Mailing Zip Code	5	The 5-digit Zip Code used by the Postal Service for the establishment. (From EQUI). If blank zero fill.
488-491	UI-Tax Mailing Expanded Zip Code	4	The 4-digit expanded Zip Code used by the Postal Service for the establishment. (From EQUI). If not used, zero fill.
492-497	NAICS Code	6	The 6 digit North American Industry Classification System code of the establishment
498	Auxilliary Code	1	0 =Unknown 1 = Admin HQ or DP 2 = Research and Development 3 = Storage 5 = Not an auxiliary 9 = Other auxiliary
499-504	Auxilliary NAICS Code	6	The 6 digit North American Industry Classification System code of the sub-establishment.
505-514	Predecessor UI Account Number	10	The UI account number previously used by this establishment. If unknown, blank fill.
515-519	Predecessor Reporting Unit Number	5	The previously used number assigned by the State to distinguish between records with the same UI account number. Right justify, zero fill.
520-529	Successor UI Account Number	10	The UI account number that succeeds the previously used by this establishment. If unknown, blank fill.
530-534	Successor Reporting Unit Number	5	The number that succeeds the previously assigned number by the State to distinguish between records with the same UI account number. Right justify, zero fill.
535	Ownership Code	1	Type of ownership. 1 = Federal Govt 2 = State Govt 3 = Local Govt 5 = Private Blank fill.

536-538	Township Code	3	Three digit code used by states in the Boston Region. Zero fill if not applicable.
539-542	SIC Code	4	Standard Industry Classification Code. If unknown, zero fill.

Comment Codes

Code	Comment
01	Seasonal increase
02	Seasonal decrease
03	More business (expansion)
04	Less business (contraction)
05	Short-term/specific business project starting or continuing
06	Short-term/specific business project completed or approaching completion
07	Layoff, not elsewhere classified
08	Strike, lockout, or other labor dispute
09	Temporary shutdown
10	Conversion or remodeling of facilities, retooling, or repair and maintenance of equipment resulting in employment decrease
11	Conversion or remodeling of facilities, retooling, or repair and maintenance of equipment resulting in employment increase
12	Internal reorganization, downsizing, or bankruptcy resulting in employment decrease
13	Internal reorganization resulting in employment increase
14	Nonstandard work schedule
15	Interplant transfer
16	Establishment moved out of State
17	Establishment moved into State
18	Active employer reporting zero employment and wages
19	Employment returns or returning to normal or a new normal after events coded 07 - 18
20	Wage rate decrease
21	Wage rate increase (including COLAs)
22	Increase in percentage of lower-paid employees
23	Increase in percentage of higher-paid employees
24	Lower hourly earnings or wages because of piecework or lower incentive pay
25	Higher hourly earnings or wages because of piecework or higher incentive pay

26	Less overtime worked at premium pay or less overtime worked
27	Overtime worked at premium pay or more overtime pay
29	Severance pay distributed
30	Wages paid to employees working in pay periods not including the twelfth of the month and not shown in employment
31	Bonuses, executive pay, profits distributed, or unidentified lump-sum payments
32	Change in commissions
33	Faculty paid over a nine-month period. Lump-sum payments made at end of school term
34	Change in hourly earnings or pay because of change in amount of shift work with pay differential
35	Change in hours, earnings, or wages due to legislation or administrative regulations
36	Pay returns or returning to normal or a new normal after events coded 29-35
40	Shorter scheduled workweek or fewer hours worked. Number of pay periods less than usual
41	Longer scheduled workweek or more hours worked. Number of pay periods greater than usual
42	Decrease in part-time workers
43	Increase in part-time workers
44	Return to normal after end of paid vacation or receiving vacation pay or other paid leave
45	Employees on paid vacation or receiving vacation pay or other paid leave
46	Employees on unpaid vacation or unpaid leave
47	Return to normal after end of unpaid vacation or unpaid leave
49	Employees working and receiving vacation pay
50	Adverse weather conditions
51	Fire disruption
52	Natural disaster disruption
53	Nonnatural disaster disruption
54	Energy shortage
55	Data return or returning to normal or new normal after events coded 50-54, 56, or 57
56	Secondary-effects decrease
57	Secondary-effects increase
58	Environmental legislation
59	Defense-related buildups
60	Defense-related cutbacks
61-64	Temporary Codes determined by BLS national office
65-74	State Specific Comment Codes for CES use only
75	Change in tax rate

76	Change in Reimbursing/Nonreimbursing status
77	Change in UI coverage
78	Change in taxable wage base
79	Change in taxable wages and contributions
80	Change from unclassified to classified SIC or County
81	Non-economic code change (first quarter)
82	Economic code change
83	Reporting change from firm to or from Employee leasing co.
84	Data adjusted for summer month education (CES only)
85	New establishment or subunit
86	Establishment permanent/temporarily out of business
87	Reactivated UI account or subunit (202 only)
88	Establishment dissolution
89	Establishment merger
90	Reporter changes basis of reporting -single to multi (showing greater detail)
91	Reporter changes basis of reporting -multi to single (showing less detail)
92	CES cancellation (CES only)
93	Change of ownership
94	Problem reporter-do not contact (CES only)
95	Data verified using CES (ES-202 only)
96	Data used pending verification
97	Verified by respondent (CES only)
98	Verified by regional office (CES only)
99	Data verified (ES-202 only)</TBODY>

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COMMISSIONER'S ORDER NO. 3-93

Date: August 18, 1993

Commissioner's Order No. 3-93

Subject: Confidential Nature of BLS Records

1. Purpose. The purpose of this Order is to state Bureau of Labor Statistics (BLS) policy concerning its confidential records.
2. Reference Office. Office of Administration, Division of Management Systems.
3. Authority. Secretary's Order 39-72, "Control of Data and Information Collected by the Bureau of Labor Statistics," assigns the Commissioner of Labor Statistics responsibility for confidentiality policy and procedures related to the protection of BLS data and for deciding on all requests for public disclosure of data collected by BLS. Secretary's Order 9-75, "Delegation of Authority and Assignment of Responsibilities for Labor Statistics Programs," Secretary's Order 10-83, "Delegation of Authority and Assignment of Responsibilities for Statistical Programs Conducted by State Employment Security Agencies Under Cooperative Arrangements with the Department of Labor," and Secretary's Order 1-90, "Delegation of Authority and Assignment of Responsibilities for Occupational Safety and Health Programs," assign the Commissioner the responsibility of planning and managing statistical programs in the Department of Labor.
4. Directives Affected. Commissioner's Order No. 2-80, "Confidential Nature of Bureau Records," is replaced by this Order. In all cases where Commissioner's Order 2-80 is cited as BLS policy, this Order is henceforth the applicable document. The November 30, 1982, memorandum from the Commissioner to the Regional Commissioners titled "Delegation of Authority to Authorize Publication of Data That Do Not Meet BLS Confidentiality Disclosure Standards" is canceled.
5. References. BLS Directives Chapter 5100, "Responsibility for Safeguarding Sensitive Information," and BLS Commissioner's Order No. 1-85, "Consumer Price Index Futures Contracts," provide additional information on the BLS confidentiality policy.
6. Definitions. For purposes of this Order:
 - a. Data refers to all elements of information from a statistical program. Individually identifiable data refers to all elements of information (including but not limited to names and addresses) that might identify participants in a statistical program by either direct or indirect means. Pre-release economic series data means statistics and analyses which either have not yet been cleared for release or which have a set date and time of release before which they must not be divulged.
 - b. Statistical purposes refers to the description, estimation or analysis of the characteristics of groups without regard to the identities of individuals or organizations that comprise such groups, and the

development, implementation or maintenance of methods, procedures or information resources that support such purposes. This definition does not include any use of individually identifiable data for administrative, regulatory, enforcement or other similar purposes.

7. Policy. In conformance with existing law and Departmental regulations, it is the policy of BLS that:
 - a. Data collected or maintained by, or under the auspices of, BLS under a pledge of confidentiality shall be treated in a manner that will assure that individually identifiable data will be used only for statistical purposes and will be accessible only to authorized persons.
 - b. Pre-release economic series data prepared for release to the public will not be disclosed or used in an unauthorized manner before they have been cleared for release, and will be accessible only to authorized persons.
8. Designation of Authorized Persons. Authorized persons include only those individuals who are responsible for collecting, processing, or using the data in furtherance of statistical purposes or for the other stated purposes for which the data were collected. Authorized persons are authorized access to only those data which are integral to the program on which they work, and only to the extent required to perform their duties. The following categories of individuals are authorized persons:
 - a. BLS employees who sign the BLS Acknowledgment Letter when they enter on duty.
 - b. State agency employees who are directly involved in BLS/State cooperative programs, subject to the provisions of the BLS/State cooperative agreement. They continue to be subject to State laws that prohibit them from disclosing the data.
 - c. Contractor employees when the contract under which they are working contains provisions that include the BLS confidentiality policy and the employees have signed the BLS Non-disclosure Affidavit.
 - d. Employees of a Federal agency other than BLS when that agency is subject to an agreement with BLS that includes the BLS confidentiality policy, the employees have signed the BLS Non-disclosure Affidavit, and the employees are directly involved in a cooperative program with BLS or are otherwise serving as BLS agents in the conduct of BLS programs.

Any individuals or organizations not meeting the criteria in parts a. through d. of this section shall be granted access to confidential BLS records only when authorized by the Commissioner for a statistical or research purpose that furthers the mission and functions of BLS. Such authorization shall be in the form of a Memorandum of Understanding, Letter of Agreement, or other appropriate agreement signed by both the Commissioner and the head of the receiving organization. The authorization document will state the purpose for which the data will be used and that all persons with access to the data will follow the BLS confidentiality policy, including signing the BLS Non-disclosure Affidavit.

9. Other Actions in Support of This Policy. In the execution of this general policy concerning confidential BLS records, the following requirements shall be in effect:
 - a. Data collected in cooperation with another Federal or State agency are covered by the policy of this Order. The joint participation shall be indicated on the collection vehicle and by notifying the respondent of the cooperative nature of the survey in any letter or personal visit used in the original contact with the respondent.

- b. Universe lists derived from information provided to BLS under an agreement of confidentiality shall be kept confidential.
- c. The survey sample composition, lists of reporters and names of respondents shall be kept confidential, regardless of the source of such lists or names.
- d. Publications shall be prepared in such a way that they will not reveal the identity of any specific respondent and, to the knowledge of the preparer, will not allow the data of any specific respondent to be imputed from the published information.
- e. All individuals or organizations, government or private, who enter into a contract for the collection, processing, maintenance, or storage of data shall conform to the BLS confidentiality policy and to all specific procedures published pursuant to this Order.
- f. Each BLS/State cooperative agreement shall designate a State official to serve as a State Cooperating Representative. The State Cooperating Representative shall act as the focal point for ensuring that all provisions of the BLS confidentiality policy are understood and complied with in the cooperating State agency.
- g. Any restrictions placed by foreign sources upon the use of data obtained from those sources shall be observed. Also, any limitations placed by the Department of State or other agency upon the use, dissemination, or handling of data obtained through Foreign Service channels shall be observed wherever applicable.

10. Exceptions Under Conditions of Informed Consent. Exceptions to the general policy relating to the disclosure of confidential data set forth in Section 7, "Policy," or to the provisions listed in Section 9, "Other Actions in Support of This Policy," shall be granted only under the conditions of informed consent. Except as outlined in Section 11, "Assignment of Responsibility," the informed consent provisions of this section may be used only with prior authorization by the Commissioner. Under the conditions of informed consent, one of the following conditions must be met:

- a. It is made clear to the respondent when the data are obtained that they will be released under specified conditions. This notification must be in writing, either on the collection vehicle itself or in an accompanying letter.
- b. The written permission of the respondent to release the data is secured after the data have been furnished to BLS on a confidential basis. The actual respondent (or for establishments, a management level official who clearly has proper authority) must authorize the release. In cases where establishments no longer exist and no successor establishment can be located, the Commissioner retains sole discretion on whether a release will be authorized.

The written permission of the respondent must be obtained and kept on file by the authorized person negotiating the conditions of informed consent.

11. Assignment of Responsibility.

- a. For the BLS Covered Employment and Wages Program, the Associate Commissioner for Employment and Unemployment Statistics is assigned responsibility to establish policies and procedures for exceptions to the general confidentiality policy set forth in Section 7a when respondents are given notice, at or before the time the data are obtained, of any nonstatistical State use of individually identifiable data.
- b. For BLS/State cooperative programs, the Associate Commissioner for Field Operations is assigned the responsibility to establish policies and procedures for exceptions to the publication policy set forth in Section 9d when the written consent of respondents has been obtained. Such policies and procedures shall provide for the approval of those exceptions, and for obtaining and maintaining records of the respondent's written consent in the regional office and State files.

12. Implementation. All BLS offices and employees are responsible for adhering to the policy set forth in this Order. The Office of Administration will issue specific procedures and provisions to support the implementation of this policy. Such procedures and provisions will be issued in Chapter 5100 or related chapters of the BLS Directives System.

13. Disciplinary Actions. It is the policy of BLS to enforce the provisions of this Order to the full extent of its authority. Any willful disclosure of confidential records by a BLS employee in violation of the policy and provisions of this Order will constitute cause for BLS to take an adverse action against the employee.

WILLIAM G. BARRON, JR.

Acting Commissioner of Labor Statistics