



July 2017

# 2020 CENSUS

## Bureau Is Taking Steps to Address Limitations of Administrative Records

# GAO Highlights

Highlights of [GAO-17-664](#), a report to congressional requesters

## Why GAO Did This Study

The cost of the decennial census has escalated the last 4 decades. To help control costs for the 2020 Census, the Bureau plans to use innovative methods, including administrative records when they are of sufficient quality to reduce expensive field visits. Administrative records are information already provided to the federal government and others to administer programs such as tax collection and public assistance. While these innovations have potential to control cost, they also introduce new risks. GAO added the 2020 Census to its High-Risk List in part because of the challenges with implementing administrative records and other innovations. GAO was asked to review coverage limitations of administrative records and what the Bureau is doing to address them.

This report describes (1) steps the Bureau has taken to address limitations for the use of administrative records in the 2020 Census and (2) the Bureau's planned uses of administrative records that have not been tested. GAO reviewed documentation from the Bureau on its assessments, testing, and preparations for using administrative records in 2020, and interviewed cognizant Bureau officials. GAO reviewed academic and other articles to identify limitations on the use of administrative records.

GAO provided a draft of this report to the Department of Commerce, which agreed with the findings.

View [GAO-17-664](#). For more information, contact Robert Goldenkoff at (202) 512-2757 or [goldenkoffr@gao.gov](mailto:goldenkoffr@gao.gov).

July 2017

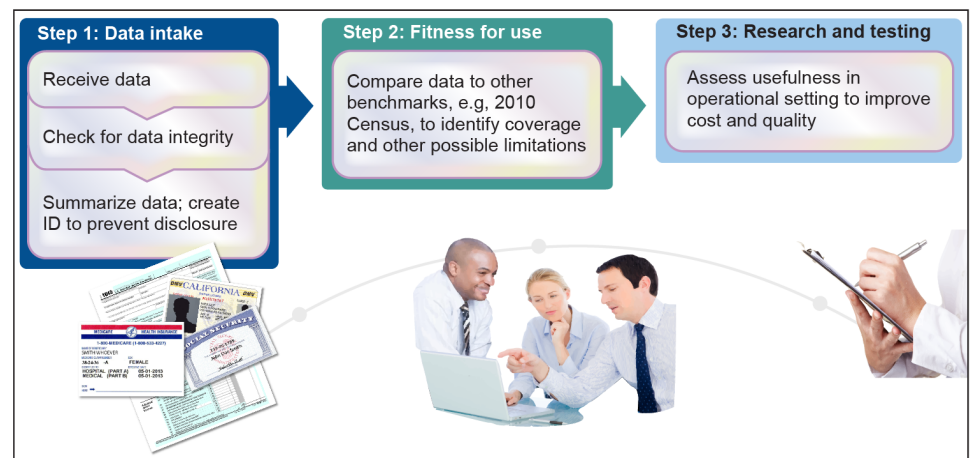
## 2020 CENSUS

### Bureau Is Taking Steps to Address Limitations of Administrative Records

## What GAO Found

The Census Bureau (Bureau) has taken steps to ensure that its use of administrative records will lower the cost and improve the accuracy of the 2020 Census. For example, the Bureau set a rule that it will only use administrative records to count a household when a minimum amount of information is present within data sources. According to the Bureau, this helps ensure that administrative records are used only in circumstances where research has shown them to be most accurate. This step will also assist the Bureau in avoiding missing populations that may be underrepresented in administrative records, such as the homeless or recent immigrants. Additionally, before using any administrative records to support census operations, the Bureau is to subject each source to a quality assurance process that includes, among other things, basic checks for data integrity as well as assessments by subject matter experts of the information's fitness for various uses by the Bureau. (See figure below.)

#### Census Bureau Implements Quality Assurance Steps before Using Administrative Records



Source: GAO analysis of U.S. Census data. | GAO-17-664

According to the Bureau, it links administrative records data sources to complement each other, improving their reliability and completeness. The Bureau told GAO it also creates an anonymous personal identifier for each individual in the data to reduce the risk of disclosure once the data are linked across sources.

The Bureau has already tested the uses of administrative records that hold the most potential for reducing census costs, such as counting people who did not respond to census mailings. The Bureau plans to test additional applications of administrative records for the first time during its upcoming 2018 End-to-End Census Test, which is essentially a dress rehearsal for 2020. For example, it plans to test the use of administrative records to help detect fictitious census responses. Testing the remaining uses should help detect potential problems that, if unaddressed for the 2020 Census, could increase costs.

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## Abbreviations

Bureau	U.S. Census Bureau
CHUMS	Computerized Homes Underwriting Management System
FHA	Federal Housing Administration
HHS	Department of Health and Human Services
HUD	Department of Housing and Urban Development
IRS	Internal Revenue Service
NRFU	Non-response follow-up
OMB	Office of Management and Budget
PIC	Public and Indian Housing Information Center
SNAP	Supplemental Nutrition Assistance Program
SSA	Social Security Administration
SSI	Supplemental Security Income
TANF	Temporary Assistance to Needy Families
USPS	U.S. Postal Service
VSGI	Veterans Service Group of Illinois
WIC	Special Supplemental Nutrition Program for Women, Infants, and Children

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July 26, 2017

Congressional Requesters:

With a cost of about \$12.3 billion, the 2010 Census was the most expensive population count in U.S. history, costing about 31 percent more than the \$9.4 billion 2000 Census (in constant 2020 dollars). Some cost growth is to be expected because the population is growing and becoming more complex and difficult to count, which increases the Census Bureau's (Bureau) workload. However, the cost of counting each housing unit has escalated from about \$16 in 1970 to \$92 in 2010 (in constant 2020 dollars), according to the Bureau.

The Bureau plans to control such cost growth for the 2020 Census by, among other actions, relying on administrative records to help reduce expensive and unnecessary field visit follow-ups to vacant or non-existing households. Administrative records are data collected by federal and state governments in the course of providing services and administering programs such as tax collection, nutrition assistance, and public assistance for housing or health needs. Examples of these include data from Internal Revenue Service (IRS) tax returns and applications for programs such as the Supplemental Nutrition Assistance Program, Temporary Assistance to Needy Families, and Medicaid. The Bureau also plans to rely on commercial or third-party data collected and compiled from public utilities records, among other sources.<sup>1</sup>

The Bureau has estimated that using administrative records could reduce the cost of the 2020 Census by \$1.4 billion compared to the cost of using "traditional" methods from the 2010 Census.<sup>2</sup> The Bureau Director has testified that the Bureau hopes to reallocate any cost savings it achieves by using administrative records toward enumerating hard-to-count

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<sup>1</sup>In order to ensure the confidentiality of protected information and administratively restricted information, administrative records provided by source agencies, such as federal tax information, are protected under Title 13—in addition to protections applicable when they were collected. Unauthorized use of these records is a crime which can result in severe penalties, such as a fine, imprisonment or both. 13 U.S.C. §214.

<sup>2</sup>In May 2017, we testified that while the Bureau has taken significant steps toward improving its capacity to produce reliable cost estimates, those efforts have not yet resulted in a reliable decennial cost estimate, so the precise savings are uncertain. See *2020 Census: Sustained Attention to Innovations, IT Systems, and Cost Estimation Is Needed*, [GAO-17-584T](#) (Washington, D.C.: May 3, 2017).

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populations. In preparation for the 2020 Census, the Bureau has been testing the quality of administrative records it has access to and developing ways to ensure its use of records does not adversely affect census quality. One of the reasons we added the 2020 Census to our High-Risk List this year was the challenge the Bureau faces in implementing innovations such as using administrative records.<sup>3</sup>

You asked us to review the Bureau's research about coverage limitations of the administrative records the Bureau is planning to use for the 2020 Census and what the Bureau is doing to address them. Our objectives were to describe (1) the steps the Bureau has taken to address limitations for the use of administrative records in the 2020 Census, and (2) the Bureau's planned uses of administrative records that have not yet been tested. To address both objectives, we reviewed documentation from the Bureau on its research, testing, and the status of activities preparing for the use of administrative records in 2020, and we interviewed cognizant Bureau officials. To identify steps taken, we also identified changes the Bureau has made based on its research and testing, and interviewed officials throughout the stages of the Bureau's quality assurance framework. We also reviewed academic and other publications on the use of administrative records to learn what other concerns and limitations may have been identified.

We conducted this performance audit from January 2017 through July 2017 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain, sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

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## Background

For decades, the Bureau has been considering how it could use administrative records to help reduce costs and improve accuracy of the decennial census. During that time, the Bureau has used administrative records on a limited basis, as shown in the following examples:

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<sup>3</sup>We also added the 2020 Census to our High-Risk List due to challenges the Bureau faces in implementing and securing necessary information technology systems and developing a reliable cost estimate for the 2020 Census. GAO, *High-Risk Series: Progress on Many High-Risk Areas, While Substantial Efforts Needed on Others*, [GAO-17-317](#) (Washington, D.C.: Feb. 15, 2017).

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- As far back as 1970, to help count people in group quarters, such as college dormitories and prisons, the Bureau made limited use of administrative records maintained by those institutions, such as lists of students and prisoners.
  - For the 2000 Census, the Bureau found that there was potential to use administrative records to assist with counting people who had not responded to census mailings—an operation called non-response follow-up (NRFU)—but that additional research was needed. NRFU is a key driver of census cost. In the 2010 Census, the Bureau hired over 600,000 employees to visit about 50 million addresses making up to six attempts at each, at a cost of over \$2 billion (in constant 2020 dollars).
  - Since 2000, the Bureau has used addresses provided by the U.S. Postal Service (USPS) Delivery Sequence File as a starting point to update its Master Address File, a data file that contains a list of all known living quarters in the United States and Puerto Rico.<sup>4</sup>
  - For the 2010 Census, the Bureau used administrative records to follow up on potentially inaccurate census responses.

For the 2020 Census, the Bureau plans to use administrative records much more extensively. The Bureau plans to leverage several federal, state, and third-party sources of administrative records in support of numerous operations.<sup>5</sup> We had earlier reported on the Bureau's readiness for many of these operations.<sup>6</sup> The operations include, for example, NRFU, where the Bureau is to use records and statistical models to identify and remove vacant addresses from the follow-up workload. The Bureau's modeling relies on over 20 different sources of linked records. In prior decennials, enumerators would have first made costly visits to each vacant house before they were deleted from the address list.

Using related modelling, the Bureau also plans to use administrative records to identify which non-responding housing units are occupied. In cases where administrative records are sufficient and one follow-up visit

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<sup>4</sup>USPS maintains and regularly updates the Delivery Sequence File as a database of all addresses to which it delivers mail, and provides this information regularly to the Bureau.

<sup>5</sup>U.S. Census Bureau, *2020 Census Operational Plan: A New Design for the 21st Century*, Version 2.0 (September 2016).

<sup>6</sup>GAO, *2020 Census: Additional Actions Would Help the Bureau Realize Potential Records Cost Savings*, [GAO-16-48](#) (Washington, D.C.: Oct. 20, 2015).

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has been unsuccessful, the Bureau is to use the same records to determine the count of people living in the household as well as the race, sex, and other characteristics of each person as required by the census. These modelling procedures using administrative records have been demonstrated by the Bureau in prior tests.

Administrative records collected by various programs, by their design, only contain information about the subgroups of the population the respective programs serve or engage. For example, the Selective Service System registers only men over the age of 18; therefore, the data provided to the Bureau include no women or children. The Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) covers low-income women and children up to age 5 who are found to be at nutritional risk and who apply for food assistance. Men and families above the program's income criteria do not generally appear in the WIC data provided to the Bureau. Appendix II includes a more extensive list of administrative-record sources the Bureau plans to use and who is covered by them.<sup>7</sup>

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## The Bureau Is Taking Steps to Address Known Limitations with Administrative Records

The Bureau Took Actions to Address the Risk of Administrative Records Missing Certain Populations

To position the agency to realize cost and quality improvements for the decennial, the Bureau has implemented steps to ensure that using administrative records is viable for 2020 and to address potential coverage limitations.

Because the purpose and target group of each of the programs vary, the demographic data collected from those covered by each program are not always the same. For example, in May 2017 the Urban Institute issued a report that raised several concerns about the use of administrative records for the 2020 Census, such as whether those records are less likely to represent people who do not routinely interact with society's

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<sup>7</sup>Bureau officials state that they are assessing administrative records and will determine the final set of administrative records data sources to be used to support the 2020 Census by September 2018.



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public institutions—citing the homeless, undocumented immigrants, formerly incarcerated people, and runaway or trafficked youth.<sup>8</sup>

According to Bureau reviews of numerous record sources, such as from Supplemental Security Income (SSI) and Temporary Assistance for Needy Families (TANF), noncitizens and more recent entrants into the United States who are less likely to be eligible for some government assistance programs are underrepresented by counts based solely on administrative records. Further, according to the Bureau, third-party sources that rely heavily on utility or publicly available property tax records will underrepresent noncitizens and recent immigrants who are less likely to have established housing. Moreover, according to a working group of the Bureau's National Advisory Committee tasked with advising on administrative records, the records generally tend to over-represent white and economically advantaged populations in comparison to how other groups appear in the records.

To help minimize possible coverage problems with administrative records so that subpopulations are not miscounted, the Bureau introduced a business rule to include administrative records for consideration in its modeling only when a minimum amount of information is present for a given household. Specifically, the Bureau must have an age for and be able to uniquely identify each person within its administrative records sources in order for the records to be considered for enumeration for that household. Bureau officials acknowledge that this business rule limits somewhat the extent to which it can rely on administrative records in place of more expensive door-to-door data collection methods for households that do not respond. Yet they also believe that their research has shown that the rule ensures that administrative records are used only in circumstances where research has shown them to be most accurate.

The Bureau has also developed statistical models for determining when administrative records are sufficiently reliable to represent a housing unit. The Bureau models what administrative records indicate about whether a housing unit is vacant, non-existent, or occupied, and also about who lives in units believed to be occupied. The models allow the Bureau to estimate the probability that administrative records are providing the correct information; the Bureau then uses the records when the

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<sup>8</sup>The Urban Institute, *Administrative Records in the 2020 US Census: Civil Rights Considerations and Opportunities* (Washington, D.C.: The Urban Institute, 2017).

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probabilities exceed a specified threshold. According to the Bureau, this approach lets it confidently rely on records where they appear to be strongest, resolving in an objective manner what the administrative records may report for the housing units in question.

The Bureau modified its NRFU contact strategy to ensure better coverage of non-Hispanic black households. The Bureau found in simulations of its initial administrative records approach that it was obtaining higher vacancy rates in areas of high concentration of non-Hispanic blacks than it did in those areas in the 2010 Census. The Bureau attributed this result to its administrative-records modeling of which households are vacant, and the Bureau determined that it could improve the modeling results by requiring two—instead of just one—notifications from USPS that mail could not be delivered to the addresses in question. So the Bureau added the step of an additional mailing to its contact strategy for households that USPS flagged as vacant. The Bureau acknowledged that this additional contact will cost more, but it will decrease the chance of a family being missed by the census, particularly where housing units turn out not to be vacant.

The Bureau Plans to Assess and Link Its Data Sources to Address Incomplete or Inaccurate Administrative Records

Although the Bureau has no control over the accuracy of data provided to it by other agencies, it is responsible for ensuring that it is fit for purposes of the 2020 Census. Administrative records collected by other agencies for programs they administer are inevitably collected under a variety of circumstances and conditions. Since they are collected for purposes other than for the decennial census, the quality control over their collection will vary from how the Bureau would execute it or need it to be. The data received by the Bureau may be incomplete or inaccurate. Missing data can make it more difficult to match administrative records.

Before using any administrative records to support census operations—whether for the 2020 Census or other Bureau surveys—the Bureau subjects each source and its files to a structured quality assurance process to (1) identify any technical limitations that may need to be considered and (2) help determine their suitability for the decennial and other Bureau programs. Although, we did not test the use of this process, figure 1 shows the process the Bureau is to follow.

**Figure 1: Census Bureau Implements Quality Assurance Steps before Using Administrative Records**



Source: GAO analysis of U.S. Census data. | GAO-17-664

According to the Bureau, it links its administrative records data sources to complement each other, improving their reliability and completeness. However, there are challenges to linking records. First, according to a working paper from a Bureau study team, linking records is not always straightforward, as names and other personal identifiers can vary in different sources. Second, the risk of disclosure of personal information increases when more information is linked together.

To address this challenge, the Bureau has developed anonymous unique personal identifiers for each individual in its data. Unique identifiers allow the Bureau to link varied sources without copying personal information, such as Social Security numbers, among its production files. The Bureau typically relies on a large number of linked files at once, rather than on individual sources, when using administrative records to support the census.

The Bureau created a database identifying the most likely race and ethnicity because different sources report conflicting information

Race and Hispanic origin data collected by others is not always collected the same way and may conflict. For example, states administering the Medicaid program do not always collect race, ethnicity, and other demographic data the same way. A 2011 report submitted to Congress by the Secretary of the Department of Health and Human Services (HHS) stated that a review of Medicaid online applications revealed that states

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sometimes list ethnic groups on applications under “race.”<sup>9</sup> Federal agencies are to report race based on guidance from the Office of Management and Budget (OMB), which separates the race and ethnicity categories.<sup>10</sup> The HHS report also noted that sometimes demographic data can be less reliable and lead to inconsistencies when it is recorded by a third party and not self-reported.

To help assign a single race and Hispanic origin with the highest level of agreement with 2010 Census responses, the Bureau drew upon federal, state, and third-party files to create a common database that its various uses of administrative records could link to and draw on. The Bureau created this database from sources such as the Department of Housing and Urban Development (HUD) Public and Indian Housing Information Center, TANF, and third-party or commercial data files. Bureau research with this database has shown that when the Bureau can match an individual into this file, the race and ethnicity categories match the values obtained in either prior censuses or other Bureau surveys over 90 percent of the time.

The Bureau Created a Database to Better Identify Relationships between Children and Adults, Because Data on Children Are Often Incomplete

Young children, particularly minority children, have been historically undercounted at disproportionately high rates compared to other age cohorts. The Bureau had found a persistent undercount of young children under the age of 5 in the decennial census. In fact, the Bureau states that there was an estimated undercount of 4.6 percent or nearly 1 million young children in the 2010 Census. The Bureau has stated that part of the work needed to address this issue could include the use of administrative records.

To help increase the number of households for which the Bureau has more information, and thus can use administrative records to reduce NRFU visits, the Bureau merged several administrative sources to identify relationships between children and adults, for whom the Bureau is more likely to have unique personal identifiers. According to the Bureau, if it can link incomplete information it has obtained about a child to complete

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<sup>9</sup>Department of Health and Human Services, *Approaches for Identifying, Collecting, and Evaluating Data on Health Care Disparities in Medicaid and CHIP* (September 2011).

<sup>10</sup>OMB provides minimum standards for maintaining, collecting, and presenting data on race and ethnicity for federal reporting purposes. The standards have five categories for data on race: American Indian or Alaska Native, Asian, Black or African American, Native Hawaiian or Other Pacific Islander, and White. There are two categories for data on ethnicity: “Hispanic or Latino,” and “Not Hispanic or Latino.” 62 Fed. Reg. 58,782.

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information it has about an adult in the household, such as a parent, it can be more confident in the list of people it has for the household.

The Bureau relies extensively on this database it has created, and calls it “Kidlink.”<sup>11</sup> The Bureau created the database primarily from data obtained from the Social Security Administration (SSA) and IRS, and believes that this effort has significantly expanded the number of households for which it has complete administrative records.

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## The Bureau Plans to Test Several Additional New Uses of Administrative Records in the 2018 End-to-End Test

Among the many uses of administrative records the Bureau is planning for the decennial, the ones shown in table 1 remain untested. The Bureau is to operationally test them for the first time in the upcoming 2018 End-to-End Test in Providence, RI. The 2018 test is essentially the Bureau’s dress rehearsal for the 2020 Census; in-field activities are to begin in August 2017. Testing of these applications under operational conditions can help the Bureau detect problems that could disrupt implementation of the 2020 Census and increase costs.

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**Table 1: Several Planned Uses of Administrative Records for the 2020 Census Are Being Tested Operationally for the First Time in the 2018 End-to-End Test**

Planned uses
Help detect fictitious self-responses
Support Nonresponse Follow-Up quality control
Telephone number look up (multiple operations)
Group quarters enumeration—use data records received electronically from administrators of respective programs.

Source: GAO analysis. | GAO-17-664

Significant among the uses not fully tested yet is the Bureau’s planned use of administrative records to help detect fictitious census responses received in the mail, over the telephone, from door-to-door visits, or over the Internet. Fraudulent responses might include those where respondents provide false information under fictitious names, or where a series of simple responses are recorded by a census enumerator

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<sup>11</sup>SSA maintains its own version of a database linking children with adults, which it also calls “Kidlink.” According to the Bureau, legal restrictions on the Bureau’s access to that file prompted the Bureau to create its own variant, and the Bureau is considering alternative names for its database that would reduce possible confusion in the future.

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falsifying data rather than visiting households door-to-door. According to Bureau officials, the Bureau compared administrative records to self-response data from the 2015 through 2017 tests as part of developing its approach for detecting such fraudulent responses, but the Bureau will first operationally test its comprehensive approach for fraud detection across all modes of self-responses during the 2018 End-to-End Test.<sup>12</sup>

Also, the Bureau is planning to use administrative records to support quality control during its non-response field enumeration. The Bureau plans to compare response data collected by enumerators to administrative records and flag significant differences based on predefined rules. The differences might be in the total count of persons in a household or in specific combinations of personal characteristics such as age or race. According to the Bureau, flagging such differences could be used to help identify which enumeration cases to re-interview as part of the quality control operation.

The Bureau has not yet developed the rules it will use or decided which comparisons it will make to administrative records, though it plans to do so by August 2017 for the 2018 End-to-End Test. By testing its rules under census-like conditions, the Bureau should have better data on the effectiveness of this use of administrative records. In particular the Bureau will better know the effectiveness within areas where other Bureau research has shown administrative records not to be as complete, such as areas with high proportions of immigrant populations.

The Bureau also has yet to test its planned reliance on administrative records and third-party sources to look up telephone numbers for two census operations.

- A telephone look-up system is planned to help support clerks who may need to follow up with respondents who did not provide a census identification number or their own telephone number when responding over the Internet.
- Telephone numbers from administrative records and third-party sources will also be used during the Bureau's nationwide independent survey to measure and evaluate the accuracy of the 2020 Census.

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<sup>12</sup>Bureau officials explain that the Bureau's fraud detection program allows the Bureau to monitor and enrich data quality and will be used only for statistical purposes, and not for enforcement or other activities that are not statistical in nature.

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According to Bureau officials, during that operation, referred to as Census Coverage Measurement, the Bureau uses these telephone numbers to help match survey and census respondents when respondents do not provide a number with their census response.

If administrative records yield needed telephone numbers within these two operations, it will result in decreased follow-up with respondents in person or less time trying to find matches, at a lower cost, according to Bureau officials.

The Bureau will also rely more directly on the administrative records and their electronic submission from group quarters, such as nursing facilities and correctional facilities, to enumerate the residents in such facilities more efficiently, rather than sending as many enumerators to the facilities to collect the information. For example, a prison could choose to submit its information about its prisoners electronically. The Bureau has enumerated group quarters with administrative records previously, but did so by visiting the facilities in person to record the data on paper forms. The Bureau intended to test this as part of the 2017 Census Test, but canceled the field work part of the test citing budget uncertainty. If the electronic submissions do not test well during the 2018 End-to-End Test, according to Bureau officials they can revert to methods used in prior decennials, although at higher cost.

The Bureau has another planned use of administrative records and third-party data that has not been tested yet, but the Bureau will not be testing it during the upcoming 2018 End-to-End Test. According to the Bureau's 2016 operational plan for the 2020 Census, the Bureau plans to use administrative records and third-party data to update addresses of transitory locations, such as recreational vehicle parks, tent cities, racetracks, carnivals, marinas, and motels. The Bureau visits such places and enumerates occupants who do not have a usual home elsewhere, typically working with state and local partners to identify the transitory locations.

According to Bureau officials, the Bureau is inviting state partners to submit the address data for known transitory locations electronically to the Bureau. Also, the Bureau plans to have staff conduct Internet research on transitory locations, such as circuses and carnivals, to help update its list. Both of these efforts have potential to help the Bureau to identify transitory locations, possibly improving coverage of people residing within them. Bureau officials have said that they thought it was an acceptable risk to proceed without including this use in a major census

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test due to the limited extent to which administrative records can support this operation and the ease with which any additional locations identified can be included in the list the Bureau will obtain directly from partners.

In 2015, we reviewed the status of the Bureau's plans for administrative records in the 2020 Census and found that the Bureau did not have deadlines for deciding on its administrative records uses, or specific milestones leading up to such decisions.<sup>13</sup> We recommended that the Bureau develop milestones. The Bureau agreed with our recommendation and told us that it would finalize which records it was using as part of NRFU by September 2018.

The Bureau has since committed to operationally test most of these remaining uses in the 2018 End-to-End Test, and also to make final decisions on all of their uses in September 2018 following the test. On that basis, we closed the recommendation and will monitor progress toward the Bureau's final decision as part of other ongoing work. Having clear decision milestones such as this helps the Bureau focus its resources on those activities that show promise for substantially reducing enumeration cost.

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## Agency Comments and Our Evaluation

We provided a draft of this report to the Department of Commerce for comment. In its written comments, reproduced in appendix II, the Department of Commerce agreed with our findings.

We are sending copies of this report to the Secretary of Commerce, the Acting Under Secretary of Economic Affairs, the Acting Director of the U.S. Census Bureau, and interested congressional committees. The report also will be available at no charge on GAO's website at <http://www.gao.gov>.

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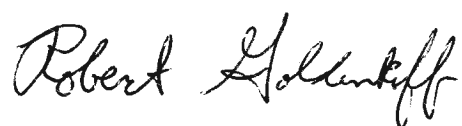
<sup>13</sup>[GAO-16-48](#).



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If you have any questions about this report please contact me at (202) 512-2757 or [goldenkoff@gao.gov](mailto:goldenkoff@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. The GAO staff that made major contributions to this report are listed in appendix III.

Sincerely yours,

A handwritten signature in black ink that reads "Robert Goldenkoff". The signature is written in a cursive style with a large, prominent "R" at the beginning.

Robert Goldenkoff

Director  
Strategic Issues

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*List of Requesters*

The Honorable Trey Gowdy  
Chairman

The Honorable Elijah E. Cummings  
Ranking Member  
Committee on Oversight and Government Reform  
House of Representatives

The Honorable Ron Johnson  
Chairman

The Honorable Claire McCaskill  
Ranking Member  
Committee on Homeland Security and Governmental Affairs  
United States Senate

The Honorable Thomas R. Carper  
United States Senate

# Appendix I: Illustrative Sources of Administrative Records

**Table 2. Illustrative Sources of Federal Administrative Records and Who Is and Is Not Covered by Them**

<b>Data source/program</b>	<b>Who is covered by the data</b>	<b>Generally who is not covered</b>
<b>Federal sources</b>		
Centers for Medicare and Medicaid Services: Medicare Enrollment Database	Medicare: Individuals age 65 or older; individuals under 65 with certain disabilities Medicaid: In general, low income families, qualified pregnant women and children, and individuals receiving Supplemental Security Income (SSI)	Medicare: Individuals, who are under the age of 65 or who do not have certain disabilities Medicaid: Families with incomes above the eligibility threshold and those not receiving SSI
Indian Health Service: Patient Registration System	Individuals who are federally recognized American Indians or Alaska Natives and have applied for health services	Individuals who are not federally recognized American Indians or Alaska Natives and have not applied for health services
IRS 1099 (Information Returns)	Individuals who report income other than wages, salaries, and tips, such as income from self-employment earnings, interest, dividends, government payments, withdrawals from retirement accounts, and taxable income from debt cancellations	Individuals that did not receive income from self-employment earnings, interest and dividends, government payments, withdrawals from retirement accounts, and taxable income from debt cancellations
IRS 1040 (Income Tax Returns)	Individuals (tax filers) with tax liabilities and earned income	Individuals with income less than the filing threshold; those with no income
Social Security Administration: Numident <sup>a</sup>	Individuals who have applied for a U.S. Social Security number	Individuals who have not applied for a U.S. Social Security number
Selective Service System Registration File	Almost all men between the ages of 18 to 25 are required to register for the Selective Service	Women and children under the age of 18
Housing and Urban Development (HUD) Computerized Homes Underwriting Management System (CHUMS) HUD Assisted Renters Public and Indian Housing Information Center (PIC) Database	HUD CHUMS: Individuals who have applied for Federal Housing Administration (FHA)-insured mortgage financing HUD PIC: Low income Native American families who have applied or receiving housing assistance	HUD CHUMS: Individuals who did not apply for FHA-insured mortgage financing Non-Native Americans who did not apply or receive housing assistance

Source: GAO analysis. | GAO-17-664

<sup>a</sup>Numident is an acronym for "Numerical Index File" the Social Security Administration's computer database file of an abstract of the information contained in an application for a social security number. It contains the name of the applicant, place and date of birth, and other information.

**Appendix I: Illustrative Sources of  
Administrative Records**

**Table 3. Illustrative Sources of State Administrative Records Data and Who Is and Is Not Covered by Them**

<b>Data source/program</b>	<b>Who is covered by the data</b>	<b>Generally who is not covered</b>
<b>State Sources</b>		
Temporary Assistance to Need Families (TANF)	In general, needy or low-income families with children who applied for temporary financial assistance	Individuals and families who do not satisfy the program's household composition or income eligibility criteria
Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)	Low-income women with infants or children up to age 5 who applied for food assistance	Men and families above the program's income criteria and age thresholds
Supplemental Nutrition Assistance Program (SNAP)	Low-income individuals and families who applied for food assistance	Individuals and families above the program's income threshold

Source: GAO analysis. | GAO-17-664

**Table 4. Illustrative Sources of Third-Party Data Providers**

<b>Data Source</b>	<b>Information contained in the data source</b>
<b>Third-Party Sources</b>	
Corelogic Property Tax and Deed Data Files	This dataset includes property tax information.
InfoUSA	This dataset contains current and historical address, name, race, Hispanic origin, age, and sex data from sources such as property taxes, voter registrations, and telephone books.
Targus Federal Consumer Files	This dataset contains address, telephone, name, race, Hispanic origin, age, and gender data.
Experian Consumer Files	This dataset contains current address, name, race, Hispanic origin, age, and gender data from credit bureau information.
Veterans Service Group of Illinois (VSGI) Consumer and Tracker Files	This database contains current address, name, date of birth, race, Hispanic origin, sex, and telephone number information from magazine/periodical change of address information, utility records, and other sources.

Source: GAO analysis. | GAO-17-664

# Appendix II: Comments from the Department of Commerce



**UNITED STATES DEPARTMENT OF COMMERCE**  
**The Secretary of Commerce**  
Washington, D.C. 20230

July 19, 2017

Mr. Robert Goldenkoff  
Director  
Strategic Issues  
U.S. Government Accountability Office  
441 G Street, NW  
Washington, DC 20548

Dear Mr. Goldenkoff:

The U.S. Department of Commerce appreciates the opportunity to comment on the U.S. Government Accountability Office's (GAO) draft report titled *2020 Census: Bureau is Taking Steps to Address Limitations of Administrative Records* (GAO-17-664).

We agree with and appreciate GAO's finding that the Census Bureau has taken steps to address known limitations with the planned uses of administrative records, which will help lower the cost and improve the accuracy of the 2020 Census.

Sincerely,

A handwritten signature in cursive script that reads "Wilbur Ross".

Wilbur Ross

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# Appendix III: GAO Contact and Staff Acknowledgments

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## GAO Contact

Robert Goldenkoff, (202) 512-2757 or [goldenkoffr@gao.gov](mailto:goldenkoffr@gao.gov)

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## Staff Acknowledgments

In addition to the contact named above, Ty Mitchell, Assistant Director; Carole J. Cimitile, Analyst-in-Charge; Mark Abraham, Robert Gebhart; Richard Hung; Kayla Robinson; and Robert Robinson.

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