

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
WOMEN, INFANTS, AND CHILDREN ADMINISTRATIVE DATA
FROM
THE WASHINGTON STATE DEPARTMENT OF HEALTH, OFFICE OF NUTRITION
SERVICES

Agreement No. [0094-2016-PAY-008]

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Washington (WA) State Department of Health, Office of Nutrition Services for the acquisition of Women, Infants, and Children (WIC) Administrative Data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the WA State Department of Health to share WIC data and enter into this agreement is Section 17 of the Child Nutrition Act of 1966, 42 U.S.C. § 1786 and implementing regulations at 7 CFR Part 246. WIC regulations at 7 CFR 246.26(d)(1)(ii) limit the disclosure of WIC recipient information to those directly connected with the administration or enforcement of the WIC program. The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the WIC program because Census will provide to the state copies of its tabulations of the data for the state to use in administering its WIC program.

Additional authority for the WA State Department of Health to enter into this agreement is RCW 43.70.040, which provides for the WA State Department of Health to enter into contracts to carry out its purposes.

3. TERMS AND CONDITIONS

Pursuant to this agreement, the WA State Department of Health, Office of Nutrition Services, hereinafter referred to as "the WA State WIC Program", will transfer records to the Census Bureau from the administration of WIC, hereinafter referred to as "WA State WIC data" and as described in Attachment A of this agreement. All data that the WA State WIC Program agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and Special Sworn Status ("SSS") researchers will have access to the data. Any data, records, or other information shared through this research agreement will be

protected from unauthorized disclosure and will be used solely for statistical purposes. When the Census Bureau publicly releases information related to this research, it will not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The WA State WIC Program agrees:

- i. To transfer to the Census Bureau via secure FTP (File Transfer Protocol) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of WIC for the years 2004–2021, as described in Attachment A.
- ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, and record length.
- iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the WA State WIC data. Record linkage identifiers will not contain any WA State WIC data or direct identifiers.

Research projects exploring whether the administrative records represent the same individuals in survey or census households may need access to name data. Access to name data will only be granted through approval by the Census Bureau Data Stewardship Executive Policy Committee. Researchers will not have access to Social Security Numbers.

- iv. To allow the Census Bureau staff and Special Sworn Status (SSS) researchers to use the WA State WIC data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

- i. To the extent provided by law, to grant access to the WA State WIC data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.
- ii. To provide the WA State WIC Program, within six (6) months of the time the data is processed and provided to Census Bureau research staff, selected tabulations of the WA State WIC data linked to the American Community Survey.
- iii. To the extent permitted by law, allow WA State WIC Program the opportunity to review and provide comments of pre-publication copies of

any report or other document containing information derived from the state data pertaining to WIC and resulting from use under this agreement of the state data. If no comments are received from the WA State WIC Program within fourteen (14) days from delivery of pre-publication documents to the WA State WIC Program, the Census Bureau shall send a reminder notice to the WA State WIC Program. If no comments are received within three (3) business days from delivery of the reminder notice, the WA State WIC Program will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this agreement.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the agreement, to prevent unauthorized use.

Processing Sites: Bowie Computer Center
 Suitland Federal Center
 Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the WA State WIC Program and the Census Bureau, respectively:

WA State WIC Program POC: Chris Halsell
 Operations and Planning Section Manager
 Office of Nutrition Services
 WA State Department of Health
 P.O. Box 47886
 Tumwater, WA 98504-7886
 (360) 236-3638
 chris.halsell@doh.wa.gov

Census Bureau POC: Dr. Amy O'Hara
 Center Chief
 Center for Administrative Records Research and Applications
 U.S. Census Bureau
 4600 Silver Hill Rd
 Washington, DC 20233
 (301) 763-5757
 amy.b.ohara@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. FUNDING

The total amount to be paid by the Census Bureau to the WA State WIC Program via Electronic Funds Transfer (EFT) is \$10,000.00. Funding is provided to reimburse the WA State WIC Program for resources needed to set up and complete the data extraction as described in Attachment C. This Agreement is considered to be a firm commitment.

6. ACCOUNTING DATA

State Agency Accounting Data:

Appropriation No.:

CAN:

DUNS No.: **808883128**

EIN: **91-1444603**

Total Amount:

Control Number:

Census Bureau Accounting Data:

Agency Location Code: **13-04-0001**

Project Code: **7030979**

Division Code: **0094**

Object Class Code: **25-30-07-00**

TAS: **013 X 4512 000**

Business Event Type Code (BETC): **DISB**

Funds Expiration: **No Year**

Funds Cancellation Date: **No Year**

Organization Code: **11-09-0094-00-00-00-00**

DUNS No.: **929955383**

EIN: **52-0204537**

Total Amount: **\$10,000.00**

Agreement No.: **0094-2016-PAY-008**

7. FINANCIAL POINTS OF CONTACT

State Agency Financial Contact: Sheridan Gatewood
Budget, Contracts and Grants Fiscal Lead
Office of Nutrition Services
WA State Department of Health
P.O. Box 47886
Tumwater, WA 98504-7886
(360) 236-3772
Sheridan.gatewood@DOH.WA.GOV

Census Bureau Financial Contact: Darrell Blyden
Chief, Financial Services Center
Finance Division
U.S. Census Bureau
4600 Silver Hill Road
Washington, DC 20233
(301) 763-4390
Darrell.b.blyden@census.gov

8. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date of the last party's signature. The agreement shall terminate six (6) years following the date on which it becomes effective. If, at the end of six (6) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties will review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, in order to determine whether it should be revised, renewed or canceled. The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the WA State WIC Program.

Notwithstanding all other provisions of this agreement, the Parties agree that:

- a. This agreement may be amended at any time by written mutual consent of both parties.
- b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

The WA State WIC data received from the WA State WIC Program will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the WA State WIC Program establishes a different timetable as clarified, when necessary, in Section 3. Terms and Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original the WA State WIC data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the WA State WIC data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and the WA State WIC data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

9. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

10. CONFIDENTIALITY

WIC regulations at 7 CFR 246.26(e) protect the confidentiality of the WA State WIC data. The Census Bureau shall protect the individually identifiable WIC information provided under this agreement in accordance with 13 U.S.C. Section 9. Both parties agree that the requirements of Title 13, Section 9, and the terms of this MOU provide sufficient protection to allow the Washington State Department of Health to satisfy its requirements to protect data pursuant to 45 C.F.R., Part 46 and all state laws governing the confidentiality of the data. The Census Bureau assumes an obligation to keep all data received from other federal, state, and tribal agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9.

Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO (Chief

Information Officer), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "Standards for Security Categorization of Federal Information and Information Systems" and NIST Special Publication 800-60r1 "Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices." Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team (US CERT). Within two business days of the Census Bureau becoming aware of a known or suspected breach of the WA State WIC data, the Census Bureau will contact the identified the WA State WIC Program contacts to discuss the actions and potential remedies regarding the incident.

11. APPROVALS



7/27/16

Ron Jarmin
Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

(Date)



10/24/16

Michael Maverick
Director, Contract & Procurement Office
WA Department of Health
(360) 236-3918
Michael.maverick@doh.wa.gov

(Date)

Attachment A: Data Elements

1. Data Requirements

Data from the administration of WIC for the years 2004—2021 will include, when available:

- a. Case unit identifiers,
- b. Complete monthly case unit address history (residence, mailing),
- c. History of benefit amounts received (monthly),
- d. Income reporting requirement (simplified reporting, change reporting, etc.),
- e. Gross income (monthly),
- f. Net income (monthly),
- g. Eligibility and denial information,
- h. Identifiers for individuals in case units, and
- i. The following information on individuals in a case unit:
 - i. Name
 - ii. Relationship to primary recipient
 - iii. Case unit/main contact phone number
 - iv. Race
 - v. Hispanic origin/Ethnicity
 - vi. Sex
 - vii. Date of birth
 - viii. Education
 - ix. Employment
 - x. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)
 - xi. History of membership in case unit

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Attachment B: Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State, Federal and Tribal Administrative Records

The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the WA State WIC data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of the WA State WIC programs in the American Community Survey (ACS), the Current Population Survey (CPS) and the Survey of Income and Program Participation (SIPP). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state, federal and tribal programs (including the WA State WIC data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing WIC participants and likely eligible non-participants of WIC

WIC data linked to ACS data can provide characteristic information for women, infants, and children participating in the WIC program. Additionally, infants and children with a high probability of being eligible for WIC can be estimated using ACS information on family structure, reported income, and public assistance.¹ The estimated eligible infants and children can be matched to the administrative WIC data to determine who is estimated to be eligible but not participating in the program, helping agencies determine unmet need. The project results can help the WA State WIC agencies improve outreach efforts. This research helps the Census Bureau better understand their survey and census data.

¹ Eligible pregnant and breastfeeding women cannot be identified in ACS data.

3. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System (PVS) uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the WA State WIC program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in the WA State WIC programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

- A. validating and enhancing the Master Address File (MAF);²
- B. designing and assigning resources to carry out the 2020 Census;³
- C. unduplicating public, private, and census lists; and
- D. imputing missing data.⁴

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

² Examples of possible Census Bureau uses include updating and evaluating the Master Address File.

³ Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.

⁴ Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

Attachment C: Statement of Work Funding WA State WIC data Data Extraction

**Statement of Work
for the
U.S. Census Bureau Funding of the Data Extraction by the
WA STATE WIC PROGRAM for
WIC Administrative Data**

Under the referenced MOU [0094-2016-PAY-008] through which the Census Bureau is acquiring WIC Administrative Data from the WA State WIC Program, Census Bureau funding reimburses the WA State WIC Program efforts to extract WIC data for the years CY2004-CY2021, by providing funds to complete the following tasks:

Task 1 – Analysis, Design, and Initial File Delivery

Through this task, the WA State WIC Program has agreed to provide WIC recipient data to the US Census Bureau. This data exists in the WA State WIC Program MIS (WIC-CIMS). While there is no charge for the data, a considerable amount of design, programming, and testing work is needed to extract the data elements needed by the Census Bureau and create a series of "flat files" for transmission to the Census Bureau. We will extract WIC case and client details for CY2004 through CY2015, create a series of files, review the files for accuracy, and provide them to the Census Bureau, along with a data dictionary and record layout, or other similar documentation. This task is expected to be completed by October 1, 2016 with delivery of all CY2004 - CY2015 files.

Task 2 – Delivery of 2016 Data

Through this task, the CY2016 data can be provided after CY2016 is complete. This is expected to be completed by June 30, 2017.

Task 3 – Delivery of 2017 Data

Through this task, the CY2017 data can be provided after CY2017 is complete. This is expected to be completed by June 30, 2018.

*This task deadline may be delayed by the WA State WIC Program implementing a new WIC-MIS database during this time period.

Task 4 – Delivery of 2018 Data

Through this task, the CY2018 data can be provided after CY2018 is complete.
This is expected to be completed by June 30, 2019.

*This task deadline may be delayed by the WA State WIC Program implementing a new WIC-MIS database during this time period.

Task 5 – Delivery of 2019 Data

Through this task, the CY2019 data can be provided after CY2019 is complete.
This is expected to be completed by June 30, 2020.

*This task deadline may be delayed by the WA State WIC Program implementing a new WIC-MIS database during this time period.

Task 6 – Delivery of 2020 Data

Through this task, the CY2020 data can be provided after CY2020 is complete.
This is expected to be completed by June 30, 2021.

*This task deadline may be delayed by the WA State WIC Program implementing a new WIC-MIS database during this time period.

Task 7 – Delivery of 2021 Data

Through this task, the CY2021 data can be provided after CY2021 is complete.
This is expected to be completed by June 30, 2022.

*This task deadline may be delayed by the WA State WIC Program implementing a new WIC-MIS database during this time period.

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MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE IDAHO DEPARTMENT OF HEALTH AND WELFARE, DIVISION OF WELFARE

Agreement No. 0094-FY17-NFE-0086

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Idaho Department of Health and Welfare, Division of Welfare (IDHW) for the acquisition of Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF) data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the IDHW to share SNAP data and enter into this agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026. The Food and Nutrition Act of 2008 limits the use of SNAP recipient information to those directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the SNAP program because Census will provide to the state copies of its tabulations of the data for the state to use in administering its SNAP program.

The authority for the IDHW to share TANF data and enter into this agreement is the Public Health and Welfare Act, 42 U.S.C. § 613.

3. TERMS AND CONDITIONS

Pursuant to this agreement, the IDHW, hereinafter referred to as "the state program agency" shall transfer records to the Census Bureau from the administration of SNAP and TANF, hereinafter referred to as "the state data" and as described in Attachment A of this agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and Special Sworn Status ("SSS") researchers will have access to the data. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it may not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. The Census Bureau will use the linked data for

research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

- i. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of SNAP and administration of TANF for readily available information between the years 2004—2021, as described in Attachment A.
- ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, record length and data dictionary.
- iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers may not contain any state data or direct identifiers.
- iv. To allow the Census Bureau staff and SSS researchers to use the state data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

- i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.
- ii. To provide the state program agency a table package based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American Community Survey (ACS). A table package shall include estimated rates of program eligibility and access/participation for the state overall and by various demographic, economic, and household characteristics and by county when the data allow. It also will include distributions across the same characteristics both for program participants and for those who are estimated to be eligible but do not participate. The table package will be delivered either within six (6) months from the date that the state administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.
- iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to SNAP and TANF and resulting from use under this agreement of the state data. If no comments are received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are

received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this agreement.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the agreement to prevent unauthorized use.

Processing Sites: Bowie Computer Center
 Suitland Federal Center
 Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the state program agency and the Census Bureau, respectively:

State program primary agency POC:
 Shane Leach
 Bureau Chief
 Division of Welfare
 450 W. State Street, 2nd Floor
 Boise, Idaho 83720
 LeachS@dhw.idaho.gov

State program secondary agency POC:
 Lori Wolff
 Division Administrator
 Division of Welfare
 450 W. State Street, 2nd Floor
 Boise, Idaho 83720
 WolffL@dhw.idaho.gov

Census Bureau POC: Dr. Amy O'Hara
 Center Chief
 Center for Administrative Records Research and Applications
 U.S. Census Bureau
 4600 Silver Hill Rd
 Washington, DC 20233
 (301) 763-5757
 amy.b.ohara@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement shall terminate six (6) years following the date on which it becomes effective. If, at the end of six (6) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, in order to determine whether it should be revised, renewed or canceled. The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Notwithstanding all other provisions of this agreement, the Parties agree that:

- a. This agreement may be amended at any time by written mutual consent of both parties.
- b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

The original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3. Terms and Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded,

produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

7. CONFIDENTIALITY

Idaho Administrative Procedure Act (IDAPA) 16.05.01. Use and Disclosure of Department Records protect the confidentiality of the state data, as well as:

- Medicaid, 42 U.S.C. § 1396(a)(a)(7), 42 CFR Part 431.300-307;
- Temporary Assistance to Needy Families, 42 U.S.C. § 602 (a)(1)(A)(iv);
- Supplemental Nutrition Assistance Program, 7 U.S.C. § 2020 (e)(8);
- 7 CFR Part 272.1(c);
- Social Security Act, 42 U.S.C. § 1396(a)(a)(7);
- Social Security Administration Disclosure, 20 CFR Part 401;
- Child Support, 42 U.S.C. § 654(26);
- Public Assistance Programs (Public Welfare), 45 CFR Part 205.50; and
- U.S. Department of Labor Employment and Training Administration, 20 CFR Part 603.

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the Chief Information Officer ("CIO"), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*." Security controls and subsequent assessments are to be completed based on the final categorization.

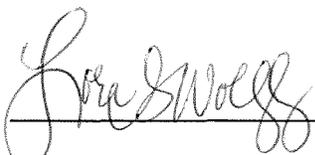
The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team ("US CERT"). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

8. APPROVALS

 _____ 11/30/2016

Michael Thieme
Acting Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

(Date)

 _____ 12/2/2016

Lori Wolff
Administrator
Idaho Department of Health and Welfare, Division of Welfare

(Date)

Attachment A: Data Elements

1. Data Requirements

Readily available monthly data from the administration of SNAP and TANF for the years 2004—2021 will include, when available:

- a. Case unit identifiers,
- b. Complete monthly case unit address history (residence, mailing),
- c. Benefit amounts received (monthly),
- d. Income reporting requirement (simplified reporting, change reporting, etc.),
- e. Gross income (monthly),
- f. Net income (monthly),
- g. Eligibility and denial information,
- h. Identifiers for individuals in case units, and
- i. The following information on individuals in a case unit:
 - i. Name
 - ii. Social Security Number
 - iii. Case unit/main contact phone number
 - iv. Relationship to primary recipient
 - v. Race
 - vi. Hispanic origin/Ethnicity
 - vii. Sex
 - viii. Date of birth
 - ix. Education
 - x. Employment
 - xi. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)

Attachment B: Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records

The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of state programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing likely eligible non-participants of SNAP

Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to

each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

- A. validating and enhancing the Master Address File (MAF);¹
- B. designing and assigning resources to carry out the 2020 Census;²
- C. unduplicating public, private, and census lists; and
- D. imputing missing data.³

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American

1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.

2 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.

3 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE ILLINOIS DEPARTMENT OF HUMAN SERVICES

Census Agreement No. [2064-FY18-NFE-0137]
Illinois No. [2018-015]

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Illinois Department of Human Services (IDHS) for the acquisition of Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF) and Women's, Infants, and Children (WIC) data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the IDHS to share SNAP data and enter into this agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026. The Food and Nutrition Act of 2008 limits the use of SNAP recipient information to those directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on October 24, 2017, has determined that the Census Bureau is directly connected with the administration of the SNAP program because Census will provide to the state copies of its research tabulations for the state to use in administering its SNAP program.

The authority for the IDHS to share TANF data and enter into this agreement is consistent with Section 1137 of the Social Security Act and Section 205.50 of Title 45, Code of Federal Regulations.

The authority for the IDHS to share WIC data and enter into this agreement is Section 17 of the Child Nutrition Act of 1966, 42 U.S.C. § 1786 and implementing regulations at 7 CFR Part 246. WIC regulations at 7 CFR 246.26(d)(1)(ii) limit the disclosure of WIC recipient information to those directly connected with the administration or enforcement of the WIC program. The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on October 24, 2017, has determined that the Census Bureau is directly connected with the administration of the WIC program because Census will provide to the state copies of its research tabulations for the state to use in administering its WIC program.

3. TERMS AND CONDITIONS

Pursuant to this agreement, the IDHS hereinafter referred to as "the state program agency" shall transfer records to the Census Bureau from the administration of WIC, SNAP

and TANF, hereinafter referred to as “the state data” and as described in Attachment A of this agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and those Special Sworn Status (“SSS”) researchers participating in the projects will have access to the data. Access shall be limited to the minimum number of individuals necessary. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it may not be disclosed in individually-identifiable form that permits the identification of any individual respondents, businesses, organizations, or institutions, and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. To the extent provided by law, the Census Bureau will recognize the state program agency as the owner of the original data in the form that it is delivered to the Census Bureau, prior to its integration with confidential Census data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

A. The state program agency agrees:

- i. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of SNAP for the years 2017–2023, as described in Attachment A.
- ii. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of TANF for the years 2004–2023, as described in Attachment A.
- iii. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of WIC for the years 2004–2023, as described in Attachment A.
- iv. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including definitions of active participants, a record layout, record count, record length and data dictionary.
- v. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers may not contain any state data or direct identifiers.
- vi. To allow the Census Bureau staff and SSS researchers to use the state data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency SNAP and TANF POC:

Paul Thelen
Senior Public Service Administrator
Bureau of Performance Management
100 S. Grand Ave East, Springfield, IL 62762
(217) 782-1128
Paul.thelen@illinois.gov

State program agency WIC POC:

Stephanie Bess
Senior Public Service Administrator
Bureau of Family Nutrition
823 East Monroe, Springfield, IL 62701
(217) 524-3353
Stephanie.bess@illinois.gov

Census Bureau POC:

Michael Berning
Assistant Division Chief
Economic Reimbursables Survey Division
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-2028
michael.a.berning@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement shall terminate six (6) years following the date on which it becomes effective. If, at the end of six (6) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, in order to determine whether it should be revised, renewed or canceled. The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Notwithstanding all other provisions of this agreement, the Parties agree that:

- A. This agreement may be amended at any time by written mutual consent of both parties.
- B. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

To the extent permitted by federal law, the original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3. Terms and Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

To promote organizational transparency, and in support of data discovery for current and future research projects, the U.S. Census Bureau posts non-sensitive data documentation to public-facing websites. This documentation, such as a record layout or data dictionary, can include file descriptions, variable lists, variable labels and valid values for each variable.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5 U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

The Census Bureau will promptly consider and adjudicate, in accordance with Federal law, claims which may arise for damages of any nature arising out of a Census Bureau act under this agreement. Such adjudication will be pursued under the Federal Tort Claims Act, 28 U.S.C. Section 2671 et seq., the Federal Employees Compensation Act, 5 U.S.C. Section 8101 et seq., or such other legal authority as may be pertinent. The U.S. Department of Justice shall determine the appropriate venues for any litigation arising under this agreement.

7. CONFIDENTIALITY

A. IT Security

The confidentiality of the state data is protected by:

- Medicaid, 42 U.S.C. § 1396(a)(a)(7), 42 CFR Part 431.300-307;
- Temporary Assistance to Needy Families, 42 U.S.C. § 602 (a)(1)(A)(iv);

- Supplemental Nutrition Assistance Program, 7 U.S.C. § 2020 (e)(8);
- 7 CFR Part 272.1(c);
- WIC, 7 CFR 246.26(e)
- Social Security Act, 42 U.S.C. § 1396(a)(a)(7);
- Social Security Administration Disclosure, 20 CFR Part 401;
- Child Support, 42 U.S.C. § 654(26);
- Public Assistance Programs (Public Welfare), 45 CFR Part 205.50; and
- U.S. Department of Labor Employment and Training Administration, 20 CFR Part 603.

The Census Bureau will comply with all federal laws applicable to the privacy or security of data received pursuant to this agreement. As a federal agency, the Census Bureau is not subject to state laws, however the Census Bureau will comply with the requirements of applicable state laws to the extent that they do not conflict with the Census Bureau's requirements under federal law.

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, United States Code. The data provided under this Agreement are confidential under 13, U.S.C. § 9. Per the Federal Cybersecurity Enhancement Act of 2015, these data are also protected from cybersecurity risks through screening of the systems that transmit the data. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the Chief Information Officer ("CIO"), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*." Security controls and subsequent assessments are to be completed based on the final categorization.

Cloud providers must be approved for at least moderate level information through the GSA FedRAMP process prior to acquiring any services. Census Bureau identifies, assesses and authorizes use based on the published FedRAMP results and an assessment of any Census Bureau (customer provided) controls implemented to protect the infrastructure and data. Security reporting on cloud providers is reported to the Department of Commerce on a regular basis under FISMA.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team ("US CERT"). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

B. Disclosure Avoidance Review of Statistical Products

Title 13, Section 9 of the United States Code (U.S.C.) requires the Census Bureau to keep confidential the information collected from the public under the authority of Title 13. Section 214 of Title 13, U.S.C., and Sections 3551, 3559 and 3571 of Title 18, U.S.C., provide for the imposition of penalties of up to five years in prison and/or up to \$250,000.00 in fines for wrongful disclosure of confidential census information.

Disclosure avoidance is the process for protecting the confidentiality of data, as required under Title 13 U.S.C. A disclosure of data occurs when someone can use published statistical information to identify an individual who has provided confidential information under a pledge of confidentiality. For data tabulations, the Census Bureau uses disclosure avoidance procedures to modify or remove the characteristics that put confidential information at risk for disclosure. Although a published table may appear to show information about a specific individual, the Census Bureau has taken steps to disguise or suppress the original data, while making sure the results are still useful. The techniques used by the Census Bureau to protect confidentiality in tabulations vary, depending on the type of data.

The parties understand that Title 13 confidentiality protection and disclosure avoidance techniques apply to all work described in this Agreement. The disclosure avoidance disclosure methods are defined by the Census Bureau which has the responsibility of carrying out that work. Accordingly, upon completion of the tabulation, the data produced must be reviewed by the Census Bureau to ensure that no identifiable Title 13 data are or may be disclosed. Should the Census Bureau's Disclosure Review Board (DRB) determine that the requested statistical product does or reasonably could result in such disclosure, then the data product will be modified prior to approval for release to the party(ies) to this Agreement. The DRB must approve before a research product can be released to an individual who does not have SSS and a need to know, or moved to a computer not approved for controlled data according to Census' existing policies and procedures.

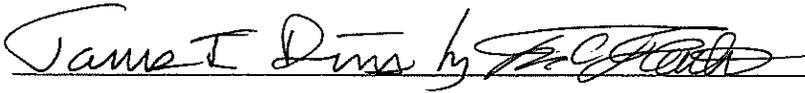
8. APPROVALS



3-6-2018

Nick Orsini
Assistant Director, Economic Programs
the U.S. Census Bureau

(Date)



5-21-2018

James T. Dimas
Secretary
Illinois Department of Human Services

(Date)

Attachment A: SNAP and TANF Data Elements

1. Data Requirements from SNAP and TANF:

Monthly data from the administration of SNAP for the years 2017–2023, and monthly data from the administration of TANF for the years 2004–2023 will include, when available:

- a. Case unit identifiers,
- b. Active Participant definitions,
- c. Complete monthly case unit address history (residence, mailing),
- d. Monthly Benefits data (any of the available: benefits received date, benefits amount issued/received, and benefit amount redeemed),
- e. Income reporting requirement (simplified reporting, change reporting, etc.),
- f. Gross income (monthly),
- g. Net income (monthly),
- h. Eligibility and denial information,
- i. Identifiers for individuals in case units, and
- j. The following information on individuals in a case unit:
 - i. Name
 - ii. Social Security Number
 - iii. Case unit/main contact phone number
 - iv. Relationship to primary recipient
 - v. Race
 - vi. Hispanic origin/Ethnicity
 - vii. Sex
 - viii. Date of birth
 - ix. Education
 - x. Employment
 - xi. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)

2. Data Requirements from WIC:

Monthly data from the administration of WIC for the years 2004–2023 will include, when available:

- a. Case Unit identifiers,
- b. Active Participant definitions,
- c. Complete monthly case unit address history (residence, mailing),
- d. Monthly Benefits data (any of the available: benefits received date, benefits amount issued/received, and benefit amount redeemed),
- e. Income reporting requirement (simplified reporting, change reporting, etc.),
- f. Income (monthly),
- g. Eligibility and denial information,
- h. Identifiers for individuals in case units, and
- i. The following information on individuals in a case unit:
 - i. Name
 - ii. Case unit/main contact phone number
 - iii. Relationship to primary recipient
 - iv. Recipient or Caretaker phone number
 - v. Race
 - vi. Hispanic origin/Ethnicity
 - vii. Sex
 - viii. Date of birth

- ix. Education
- x. Employment
- xi. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)

Attachment B: Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records

The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of state programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing likely eligible non-participants of SNAP

Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. Characterizing WIC participants and likely eligible non-participants of WIC

WIC data linked to ACS data can provide characteristic information for women, infants, and children participating in the WIC program. Additionally, infants and children with a

high probability of being eligible for WIC can be estimated using ACS information on family structure, reported income, and public assistance.¹ The estimated eligible infants and children can be matched to the administrative WIC data to determine who is estimated to be eligible but not participating in the program, helping agencies determine unmet need. The project results can help state agencies improve outreach efforts. This research helps the Census Bureau better understand their survey and census data.

4. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

5. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

- A. validating and enhancing the Master Address File (MAF);²
- B. designing and assigning resources to carry out the 2020 Census;³
- C. unduplicating public, private, and census lists; and
- D. imputing missing data.⁴

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010

1 Eligible pregnant and breastfeeding women cannot be identified in ACS data.

2 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.

3 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.

4 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

6. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE KENTUCKY DEPARTMENT FOR COMMUNITY BASED SERVICES

Agreement No. 94-2016-PAY-002

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Kentucky Department for Community Based Services (DCBS) for the acquisition of Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF) data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the Kentucky Department for Community Based Services to share SNAP data and enter into this agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026. The Food and Nutrition Act of 2008 limits the use of SNAP recipient information to those directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the SNAP program because Census will provide to the state copies of its tabulations of the data for the state to use in administering its SNAP program.

The authority for the Kentucky Department for Community Based Services to share TANF data and enter into this agreement is the Public Health and Welfare Act, 42 U.S.C. § 613.

Additional authority for the Kentucky Department for Community Based Services to enter into this agreement is KRS194A.060(2). The cabinet shall share pertinent information from within the agency's records on clients, current and former clients, recipients, and patients as may be permitted by federal and state confidentiality statutes and regulations governing release of data with other public, quasi-public, and private agencies involved in providing services to current or former clients or patients subject to confidentiality agreements as permitted by federal and state law if those agencies demonstrate a direct, tangible, and legitimate interest in the records. In all instances, the individual's right to privacy is to be respected.

3. TERMS AND CONDITIONS

Pursuant to this agreement, the Kentucky Department for Community Based Services, hereinafter referred to as "the state program agency" shall transfer records to the Census Bureau from the administration of SNAP and TANF, hereinafter referred to as "the state data" and as described in Attachment A of this agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. Maintaining confidentiality of these data is guaranteed under Title 13 U.S.C, Section 9, and the Privacy Act of 1974. Only Census Bureau staff and Special Sworn Status ("SSS") researchers will have access to the data. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes. When the Census Bureau publicly releases information related to this research, it may not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

- i. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of SNAP and administration of TANF for the years 2014–2020, as described in Attachment A.
- ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, record length and data dictionary.
- iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers may not contain any state data or direct identifiers.

Research projects exploring whether the administrative records represent the same individuals in survey or census households may need access to name data. Access to name data will only be granted through approval by the Census Bureau Data Stewardship Executive Policy Committee. Researchers may not have access to Social Security Numbers.

- iv. To allow the Census Bureau staff and SSS researchers to use the state data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

- i. To grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.
- ii. To provide the state program agency, within six (6) months of the time the state data is processed and provided to Census Bureau research staff, selected tabulations of the state SNAP and TANF data linked to the American Community Survey. SNAP profile tabulations shall describe the demographic and household characteristics of residents who are likely to be eligible for SNAP, but who do not participate in the program.
- iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to SNAP and TANF and resulting from use under this agreement of the state data. If no comments are received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this agreement.

4. CONTACTS

The parties mutually agree that the following named individual is to be designated as custodian of the files on behalf of the Census Bureau and shall be personally responsible for the observance of all conditions of use, and for the establishment and maintenance of security arrangements to prevent unauthorized use, as specified in the agreement. The Census Bureau agrees to notify the state program agency within fifteen (15) days of any changes of custodianship.

Custodian: J. Trent Alexander
Data Custodian
U.S. Census Bureau
4600 Silver Hill Road, 2K133
Washington DC 20233
(301) 763-9810
j.trent.alexander@census.gov

Processing Sites: Bowie Computer Center
Suitland Federal Center
Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency POC:

Todd Trapp
Branch Manager
Division of Family Support
275 E. Main Street
Frankfort, KY 40621
(502) 564-3440
Todd.trapp@ky.gov

Census Bureau POC:

Dr. Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. FUNDING

The total amount to be paid by the Census Bureau to the state program agency via Electronic Funds Transfer (EFT) is \$22,776.00. Funding is provided to reimburse the state program agency for resources needed to set up and complete the data extraction as described in Attachment C. This Agreement is considered to be a firm commitment.

6. ACCOUNTING DATA

State Agency Accounting Data:

Agency Location Code: **L3**

Appropriation No.:

CAN:

DUNS No.: **927-049-767**

EIN: **61-0600439**

Total Amount:

Control Number:

Census Bureau Accounting Data:

Agency Location Code: **13-04-0001**

Project Code: **7008001**

Division Code: **0094**

Object Class Code: **25-30-07-00**

TAS: **013-X-4512-000**

Business Event Type Code (BETC): **DISB**

Funds Expiration: **No Year**

Funds Cancellation Date: **No Year**

Organization Code: **11-09-0094-00-00-00-00**

DUNS No.: **929955383**

EIN: **52-0204537**

Total Amount: **\$22,776.00**

Agreement No.: **0094-2016-PAY-002**

7. FINANCIAL POINTS OF CONTACT

State Agency Financial Contact: Kelli Hill
Assistant Director, Accounting
Office of Administrative & Technology Services
275 East Main Street, Mail Stop 4E-A
Frankfort, KY 40601
502-564-8890

Census Bureau Financial Contact: Darrell Blyden
Chief, Financial Services Center
Finance Division
U.S. Census Bureau
4600 Silver Hill Road
Washington, DC 20233
(301) 763-43980
Darrell.b.blyden@census.gov

8. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement shall terminate five (5) years following the date on which it becomes effective. If, at the end of five (5) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, in order to determine whether it should be revised, renewed or

canceled. The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Notwithstanding all other provisions of this agreement, the Parties agree that:

- a. This agreement may be amended at any time by written mutual consent of both parties.
- b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

The original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3. Terms and Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

9. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

10. CONFIDENTIALITY

KRS194A.060(1) protects the confidentiality of the state data, as well as:

- Medicaid, 42 U.S.C. § 1396(a)(a)(7), 42 CFR Part 431.300-307;
- Temporary Assistance to Needy Families, 42 U.S.C. § 602 (a)(1)(A)(iv);
- Supplemental Nutrition Assistance Program, 7 U.S.C. § 2020 (e)(8);

- 7 CFR Part 272.1(c);
- Social Security Act, 42 U.S.C. § 1396(a)(a)(7);
- Social Security Administration Disclosure, 20 CFR Part 401;
- Child Support, 42 U.S.C. § 654(26);
- Public Assistance Programs (Public Welfare), 45 CFR Part 205.50; and
- U.S. Department of Labor Employment and Training Administration, 20 CFR Part 603.

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the Chief Information Officer ("CIO"), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*." Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team ("US CERT"). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

11. APPROVALS



3/19/16

Ron Jarmin
Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

(Date)



3/22/16

Adria Johnson
Commissioner
Kentucky Cabinet for Health and Family Services

(Date)

Attachment A: Data Elements

1. Data Requirements

Data from the administration of SNAP and TANF for the years 2014–2020 will include, when available:

- a. Case unit identifiers,
- b. Complete monthly case unit address history (residence, mailing),
- c. History of benefit amounts received (monthly),
- d. Income reporting requirement (simplified reporting, change reporting, etc.),
- e. Gross income (monthly),
- f. Net income (monthly),
- g. Eligibility and denial information,
- h. Identifiers for individuals in case units, and
- i. The following information on individuals in a case unit:
 - i. Name
 - ii. Social Security Number
 - iii. Relationship to primary recipient
 - iv. Race
 - v. Hispanic origin/Ethnicity
 - vi. Sex
 - vii. Date of birth
 - viii. Education
 - ix. Employment
 - x. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)
 - xi. History of membership in case unit

Attachment B: Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records

The U.S. Census Bureau administers multiple household surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of state programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing likely eligible non-participants of SNAP

Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to

each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

- A. validating and enhancing the Master Address File (MAF);¹
- B. designing and assigning resources to carry out the 2020 Census;²
- C. unduplicating public, private, and census lists; and
- D. imputing missing data.³

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.

2 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.

3 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

Attachment C: Statement of Work Funding SNAP and TANF Data Extraction

Statement of Work

for the

**U.S. Census Bureau Funding of the Data Extraction by the
Kentucky Department for Community Based Services (DCBS) for
Supplemental Nutrition Assistance Program (SNAP) and Temporary
Assistance for Needy Families (TANF) Administrative Data**

Under the referenced MOU 94-2016-PAY-002 through which the Census Bureau is acquiring SNAP and TANF Administrative Data from the Kentucky DCBS, Census Bureau funding reimburses DCBS efforts to extract SNAP and TANF monthly data for the years 2014-2020, by providing funds to complete the following tasks:

Task 1 – Analysis, Design, and Initial File Delivery

Through this task, the DCBS has agreed to provide SNAP and TANF recipient data to the US Census Bureau. While there is no charge for the data, a considerable amount of design, programming, and testing work is needed to extract the data elements needed by the Census Bureau and create a series of “flat files” for transmission to them. We will extract SNAP and TANF case and client monthly details for CY2014 through CY2015 create a series of files, review the files for accuracy, and provide them to the Census Bureau. This task is expected to be completed by February 2016 with delivery of all CY2014 through CY2015 files.

Task 2 – Delivery of 2016 Data

Through this task, the 2016 data can be provided after CY2016 is complete. This is expected to be completed by February 2017.

Task 3 – Delivery of 2017 Data

Through this task, the 2017 data can be provided after CY2017 is complete. This is expected to be completed by February 2018.

Task 4 – Delivery of 2018 Data

Through this task, the 2018 data can be provided after CY2017 is complete. This is expected to be completed by February 2019.

Task 5 – Delivery of 2019 Data

Through this task, the 2019 data can be provided after CY2019 is complete. This is expected to be completed by February 2020.

Task 6 – Delivery of 2020 Data

Through this task, the 2020 data can be provided after CY2020 is complete. This is expected to be completed by February 2021.

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
WOMEN, INFANTS, AND CHILDREN ADMINISTRATIVE DATA
FROM

The Department of Health and Human Services, Maine CDC WIC Nutrition Program
Census Agreement # 2064-FY19-NFE-0199

1. PARTIES AND PURPOSE

This Memorandum of Understanding (MOU) establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Department of Health and Human Services, Maine CDC WIC Nutrition Program (State Program Agency) for the acquisition of Women, Infants, and Children (WIC) Administrative Data.

2. AUTHORITY

The authority for the Census Bureau to enter into this Agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code. The authority for the Maine CDC WIC Nutrition Program to share WIC data and enter into this Agreement is Section 17 of the Child Nutrition Act of 1966, 42 U.S.C. § 1786 and implementing regulations at 7 CFR Part 246. WIC regulations at 7 CFR 246.26(d)(1)(ii) limit the disclosure of WIC recipient information to those directly connected with the administration or enforcement of the WIC program. The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on October 24, 2017, has determined that the Census Bureau is directly connected with the administration of the WIC program because Census will provide to the state copies of its research tabulations for the state to use in administering its WIC program.

3. TERMS AND CONDITIONS

Pursuant to this Agreement, the Maine CDC WIC Nutrition Program, will transfer records to the Census Bureau from the administration of WIC, hereinafter referred to as "the state data" and as described in Attachment A of this Agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and those Special Sworn Status (SSS) researchers participating in the projects will have access to the data. Access shall be limited to the minimum number of individuals necessary. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it will not be disclosed in individually-identifiable form that permits the identification of any individual respondents, businesses, organizations, or institutions, and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. To the extent provided by law, the Census Bureau will recognize the state program agency as the owner of the original data in the form that it is delivered to the Census Bureau, prior to its integration with confidential Census data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

- i. To transfer to the Census Bureau via secure FTP (File Transfer Protocol) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of WIC for the years 2012—2022, as described in Attachment A.
- ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this Agreement; including active participant definitions, a record layout, record count, and record length.
- iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers will not contain any state data or direct identifiers.
- iv. To allow the Census Bureau staff and Special Sworn Status researchers to use the state data at the Processing Sites listed in Section 4 of this Agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this Agreement.

b. The Census Bureau agrees:

- i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this Agreement and only for the projects listed in Attachment B or those approved in writing by both parties.
- ii. To provide the state program agency with a copy of data tabulations that the Census Bureau will create for Census research purposes. Specifically, the Census Bureau will provide the state program agency with data tabulations based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American Community Survey (ACS). Data tabulations shall include estimated rates of program eligibility and access/participation for the state overall and by various demographic, economic, and household characteristics and by county when the data allow. It also will include distributions across the same characteristics both for program participants and for those who are estimated to be eligible but do not participate. The data tabulations will be delivered either within six months from the date that the state administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.
- iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to WIC and resulting from use under this Agreement of the state data. If no comments are received from the state program agency within fourteen days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three business days from delivery of the reminder notice, the state program agency will be deemed to have no comment regarding the

delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this Agreement.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this Agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the Agreement to prevent unauthorized use. The parties mutually agree that the following locations are designated for data processing, analysis, and storage within the Census Network:

Sites: Bowler Computer Center or Other Approved Census Computer Centers
 Suitland Federal Center
 Federal Statistical Research Data Centers
 Census Approved Cloud Services

The parties mutually agree that the following named individuals will be designated as points of contact for the Agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency POC:

Ginger Roberts-Scott
Director Maine CDC WIC Nutrition Program
286 Water Street
Augusta, Maine 04333-0011
207-287-5342
Ginger.roberts-scott@maine.gov

Census Bureau POC:

Michael Berning
Assistant Division Chief
Data Acquisition and Curation
Economic Reimbursable Surveys Division
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-2028
michael.a.berning@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This Agreement is effective on the date on which it is signed by both parties. The Agreement will terminate six years following the date on which it becomes effective. If, at the end of six years, the parties wish to continue the relationship, they must execute a new agreement.

The parties will review this Agreement at least once every three years, or whenever a Federal statute is enacted that materially affects the substance of the Agreement, in order to determine whether it should be revised, renewed or canceled. The review will be conducted by the Census Bureau's Assistant Director for Economic Programs and the state program agency.

Notwithstanding all other provisions of this Agreement, the Parties agree that:

- a. This Agreement may be amended at any time by written mutual consent of both parties.

- b. Either party may terminate this Agreement upon thirty days' written notice to the other party.

To the extent permitted by federal law, the original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3, Terms and Conditions. Any revisions to the data retention timetable after the execution of this Agreement will be stated in writing in an amendment to this Agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this Agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this Agreement.

To promote organizational transparency, and in support of data discovery for current and future research projects, the U.S. Census Bureau posts non-sensitive data documentation to public-facing websites. This documentation, such as a record layout or data dictionary, can include file descriptions, variable lists, variable labels and valid values for each variable.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this Agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5 U.S.C. App. 3, a review of this Agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this Agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

The Census Bureau will promptly consider and adjudicate, in accordance with Federal law, claims which may arise for damages of any nature arising out of a Census Bureau act under this Agreement. Such adjudication will be pursued under the Federal Tort Claims Act, 28 U.S.C. Section 2671 et seq., the Federal Employees Compensation Act, 5 U.S.C. Section 8101 et seq., or such other legal authority as may be pertinent. The U.S. Department of Justice shall determine the appropriate venues for any litigation arising under this Agreement.

7. CONFIDENTIALITY

A. IT Security

State Statute 22 M.R.S. § 3762(3)(A) protects the confidentiality of the state data, as well as WIC regulations at 7 CFR 246.26(e). The Census Bureau will comply with all federal laws applicable to the privacy or security of data received pursuant to this Agreement. As a federal agency, the Census Bureau is not

subject to state laws, however the Census Bureau will comply with the requirements of applicable state laws to the extent that they do not conflict with the Census Bureau's requirements under federal law.

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, United States Code. The data provided under this Agreement are confidential under 13, U.S.C. § 9. Per the Federal Cybersecurity Enhancement Act of 2015, these data are also protected from cybersecurity risks through screening of the systems that transmit the data. Upon receipt, all data acquired as a result of this Agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO (Chief Information Officer), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*." Security controls and subsequent assessments are to be completed based on the final categorization.

Cloud providers must be approved for at least moderate level information through the GSA FedRAMP process prior to acquiring any services. Census Bureau identifies, assesses and authorizes use based on the published FedRAMP results and an assessment of any Census Bureau (customer provided) controls implemented to protect the infrastructure and data. Security reporting on cloud providers is reported to the Department of Commerce on a regular basis under FISMA.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum M-17-12. Known or suspected losses of protected data are to be reported within one (1) hour of its discovery to the Bureau of the Census Computer Incident Response Team (BOC CIRT) who will report as required to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau becomes aware of a known breach of the State Data, the Census Bureau will contact the state program agency contacts to discuss the actions and potential remedies regarding the incident.

B. Disclosure Avoidance Review of Statistical Products

Title 13, Section 9 of the United States Code (U.S.C.) requires the Census Bureau to keep confidential the information collected from the public under the authority of Title 13. Section 214 of Title 13, U.S.C., and Sections 3551, 3559 and 3571 of Title 18, U.S.C., provide for the imposition of penalties of

up to five years in prison and/or up to \$250,000.00 in fines for wrongful disclosure of confidential census information.

Disclosure avoidance is the process for protecting the confidentiality of data, as required under Title 13 U.S.C. A disclosure of data occurs when someone can use published statistical information to identify an individual who has provided confidential information under a pledge of confidentiality. For data tabulations, the Census Bureau uses disclosure avoidance procedures to modify or remove the characteristics that put confidential information at risk for disclosure. Although a published table may appear to show information about a specific individual, the Census Bureau has taken steps to disguise or suppress the original data, while making sure the results are still useful. The techniques used by the Census Bureau to protect confidentiality in tabulations vary, depending on the type of data.

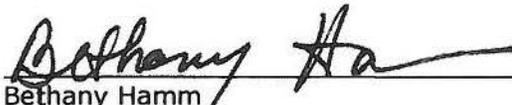
Noise infusion is the Census Bureau's preferred disclosure avoidance technique. By policy, noise infusion is applied to all data products that are reported with geographies smaller than a state. Noise infusion may be required for microdata releases, depending on the characteristics of the microdata and the specific variables that are to be released. Data that cannot be publicly released may still be analyzed within the Federal Statistical Research Data Centers (FSRDCs) by individuals who have Special Sworn Status; the results of such analyses must still go through a disclosure avoidance process prior to being publicly released.

The parties understand that Title 13 confidentiality protection and disclosure avoidance techniques apply to all work described in this Agreement. The disclosure avoidance disclosure methods are defined by the Census Bureau which has the responsibility of carrying out that work. Accordingly, upon completion of the tabulation, the data produced must be reviewed by the Census Bureau to ensure that no identifiable Title 13 data are or may be disclosed. Should the Census Bureau's Disclosure Review Board (DRB) determine that the requested statistical product does or reasonably could result in such disclosure, then the data product will be modified prior to approval for release to the party(ies) to this Agreement. The DRB must approve before a research product can be released to an individual who does not have SSS and a need to know, or moved to a computer not approved for controlled data according to Census' existing policies and procedures.

8. APPROVALS

 11/19/18

Kevin Deardorff (Date)
Chief, Economic Reimbursable Surveys Division
U.S. Census Bureau

 10/9/18

Bethany Hamm (Date)
Acting Commissioner
Department of Health and Human Services

Attachment A: Data Elements

1. Data Requirements

Monthly data from the administration of WIC for the years 2012–2022 will include, when available:

- a. Case unit identifiers,
- b. Active Participant definitions,
- c. Complete monthly case unit address history (residence, mailing),
- d. Monthly Benefits data (any of the available: benefits received date, benefits amount issued/received, and benefit amount redeemed),
- e. Income reporting requirement (simplified reporting, change reporting, etc.),
- f. Income (monthly),
- g. Eligibility and denial information,
- h. Identifiers for individuals in case units, and
- i. The following information on individuals in a case unit:
 - i. Name
 - ii. Case unit/main contact phone number
 - iii. Relationship to primary recipient
 - iv. Recipient or caretaker phone number
 - v. Race
 - vi. Hispanic origin/Ethnicity
 - vii. Sex
 - viii. Date of birth
 - ix. Gross income (monthly)
 - x. Net income (monthly)
 - xi. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)
 - xii. Education
 - xiii. Employment

Attachment B: Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records

The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of state programs in the American Community Survey (ACS), the Current Population Survey (CPS) and the Survey of Income and Program Participation (SIPP). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing WIC participants and likely eligible non-participants of WIC

WIC data linked to ACS data can provide characteristic information for women, infants, and children participating in the WIC program. Additionally, infants and children with a high probability of being eligible for WIC can be estimated using ACS information on family structure, reported income, and public assistance.¹ The estimated eligible infants and children can be matched to the administrative WIC data to determine who is estimated to be eligible but not participating in the program, helping agencies determine unmet need. The project results can help state agencies improve outreach efforts. This research helps the Census Bureau better understand their survey and census data.

3. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System (PVS) uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to

¹ Eligible pregnant and breastfeeding women cannot be identified in ACS data.

pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

- A. validating and enhancing the Master Address File (MAF);²
- B. designing and assigning resources to carry out the 2020 Census;³
- C. unduplicating public, private, and census lists; and
- D. imputing missing data.⁴

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and Intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

² Examples of possible Census Bureau uses include updating and evaluating the Master Address File.

³ Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.

⁴ Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE STATE OF MARYLAND FAMILY INVESTMENT ADMINISTRATION,
DEPARTMENT OF HUMAN RESOURCES

Agreement No. 0094-2015-NFE-05

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau ("Census Bureau") and the State of Maryland Family Investment Administration ("FIA"), Department of Human Resources ("DHR") for the acquisition of Supplemental Nutrition Assistance Program ("SNAP") and Temporary Assistance for Needy Families ("TANF") data contained in the Client Automated Resource and Eligibility System ("CARES") and the Maryland WORKS system.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the state agency to share SNAP data and enter into this agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026. The Food and Nutrition Act of 2008 limits the use of SNAP recipient information to those directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the SNAP program because Census will provide to the state copies of its tabulations of the data for the state to use in administering its SNAP program.

Additional authority for the state program agency to enter into this agreement is Md. Code Ann., Human Services § 1-201, General Provisions Article, Section 4-202, *et seq.*, and COMAR 07.01.07.04 and COMAR.

3. TERMS AND CONDITIONS

Pursuant to this agreement, the State of Maryland FIA DHR, hereinafter referred to as "the state program agency" shall transfer records to the Census Bureau from the CARES and Maryland WORKS system, hereinafter referred to as "the state data" and as described in Attachment A of this agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. Maintaining confidentiality of

these data is guaranteed under Title 13 U.S.C, Section 9, and the Privacy Act of 1974. Only Census Bureau staff and Special Sworn Status ("SSS") researchers will have access to the data. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes. When the Census Bureau publicly releases information related to this research, it may not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau shall link the state data to census data, survey data and administrative records data. The Census Bureau shall use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau shall also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

- i. To transfer to the Census Bureau via secure File Transfer Protocol ("FTP") or appropriately encrypted CD-ROM or DVD-ROM, data from the CARES for the years 2004—2016 and from the Maryland WORKS system for the years 2004—2016, as described in Attachment A.
- ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, record length and data dictionary.
- iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers may not contain any state data or direct identifiers.

Research projects exploring whether the administrative records represent the same individuals in survey or census households may need access to name data. Access to name data will only be granted through approval by the Census Bureau Data Stewardship Executive Policy Committee. Researchers may not have access to Social Security Numbers.

- iv. To allow the Census Bureau staff and SSS researchers to use the state data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

- i. To grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.
- ii. To provide the state program agency, within six (6) months of the receipt of acceptable data quality and acceptable file layouts, selected tabulations of the state data linked to the American Community Survey. These

tabulations shall describe the demographic and household characteristics of residents who are likely to be eligible for SNAP, but who do not participate in the program.

- iii. To the extent permitted by law to allow the state program agency the opportunity to review and provide comments, clearance, or rejection of pre-publication copies of any report or other document containing information derived from the state data and resulting from use under this agreement of the state data. If no response is received from the state program agency within thirty (30) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no response is received within three (3) business days from delivery of the reminder notice, the state program agency shall be deemed to have approved the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this agreement.

4. CONTACTS

The parties mutually agree that the following named individual is to be designated as custodian of the files on behalf of the Census Bureau and shall be personally responsible for the observance of all conditions of use, and for the establishment and maintenance of security arrangements to prevent unauthorized use, as specified in the agreement. The Census Bureau agrees to notify the state program agency within fifteen (15) days of any changes of custodianship.

Custodian: J. Trent Alexander
Data Custodian
U.S. Census Bureau
4600 Silver Hill Road, 2K133
Washington DC 20233
(301) 763-9810
j.trent.alexander@census.gov

Processing Sites: Bowie Computer Center
Suitland Federal Center
Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the state program agency and the Census Bureau, respectively:

State agency POC: Fern Hill
Assistant Director
Bureau of Systems Development and Management
Office of Programs
Family Investment Administration
Department of Human Resources
311 West Saratoga Street
Baltimore, MD 21201
(410) 767-7064
fern.hill@maryland.gov

Census Bureau POC: Amy O'Hara
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement shall terminate five (5) years following the date on which it becomes effective. If, at the end of five (5) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, in order to determine whether it should be revised, renewed or canceled. The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Notwithstanding all other provisions of this agreement, the Parties agree that:

- a. This agreement may be amended at any time by written mutual consent of both parties.
- b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

The parties to this agreement envision that upon expiration or termination of this agreement, that the parties shall execute a new agreement permitting the Census Bureau continued use of the original state data. For this reason, the original state data shall be retained by the Census Bureau after expiration or termination of this agreement, unless the state program agency notifies the Census Bureau in writing that the original state data are not to be retained by the Census Bureau past the expiration or termination of this agreement. If, upon expiration or termination of this agreement, the state program agency notifies the Census Bureau Point of Contact in writing that the

original state data covered by this agreement are not to be retained by the Census Bureau, the data shall be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law

If, upon expiration or termination of this agreement, the Census Bureau retains the original state data, Census Bureau researchers shall cease and desist all use of the state data until such time that a new agreement is executed which permits the use of the state data by Census Bureau researchers. The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

7. CONFIDENTIALITY

Md. Code Ann., Human Services § 1-201 protects the confidentiality of the state data. The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r3 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the Chief Information Officer ("CIO"), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*." Security controls and subsequent assessments are to be completed based on the final categorization.

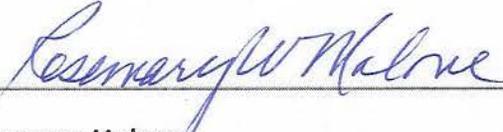
The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team ("US CERT"). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

8. APPROVALS

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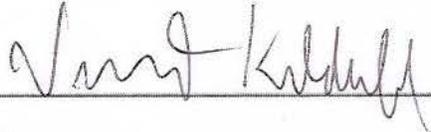
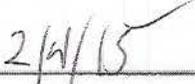
Ron Jarmin
Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

(Date)

 _____ 

Rosemary Malone
Executive Director
Family Investment Administration of the Department of Human Resources

(Date)

 _____ 

Vince Kilduff
Deputy Executive Director
Family Investment Administration of the Department of Human Resources

(Date)

Attachment A: Data Elements

1. Data Requirements

Data from the CARES for each program for the years 2004-2016, and from the Maryland WORKS system for each program for the years 2004—2016 will include, when available:

- a. Case unit identifiers,
- b. Complete case unit address history (residence, mailing),
- c. History of benefit amounts received (monthly),
- d. Income reporting requirement (simplified reporting, change reporting, etc.),
- e. Gross income (monthly),
- f. Net income (monthly),
- g. Eligibility and denial information,
- h. Identifiers for individuals in case units, and
- i. The following information on individuals in a case unit:
 - i. Name
 - ii. Social Security Number
 - iii. Contact phone number
 - iv. Contact phone number type (residence/home, message, business, cell)
 - v. Email address
 - vi. Relationship to primary recipient
 - vii. Race
 - viii. Hispanic origin/Ethnicity
 - ix. Sex
 - x. Date of birth
 - xi. Education
 - xii. Employment
 - xiii. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)
 - xiv. History of membership in case unit

Attachment B: Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records

The U.S. Census Bureau administers multiple household surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of state programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing likely eligible non-participants of SNAP

Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to

each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research and Planning for the 2020 Census

The Census Bureau intends to test and potentially use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau intends to use state program information, along with data from federal, state, and private sources to pursue the following four research initiatives, leading to improvements in quality and efficiency of 2020 Census operations:

- A. validating and enhancing the Master Address File (MAF);¹
- B. designing and assigning resources to carry out the 2020 Census;²
- C. unduplicating public, private, and census lists; and
- D. imputing missing data.³

Data quality will be explored using 2010 decennial census data to assess the quality and utility of household roster, location, and demographic characteristics data.

Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information.

Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census to assess accuracy based on the level of aggregation.

1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.

2 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.

3 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

**MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE COALITION FOR THE HOMELESS OF HOUSTON/HARRIS COUNTY**

Agreement No. 0094-FY16-NFE-0038

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Coalition for the Homeless of Houston/Harris County for the acquisition of Homeless Management Information System (HMIS) data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the Houston/Harris County Coalition for the Homeless to share HMIS data and enter into this agreement is through the Homeless Management Information System Policies and Procedures of the Houston/Harris County Continuum of Care, which states that the Houston/Harris /County Coalition for the Homeless may disclose data "to conduct a study or research project approved by the CoC".

3. TERMS AND CONDITIONS

Pursuant to this agreement, the Coalition for the Homeless of Houston/Harris County, hereinafter referred to as "the program agency" shall transfer records to the Census Bureau from the administration of HMIS, hereinafter referred to as "the program data" and as described in Attachment A of this agreement. All data that the program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and Special Sworn Status ("SSS") researchers will have access to the data. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes. When the Census Bureau publicly releases information related to this research, it may not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the program data to census data, survey data and administrative records data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the program data to provide new and improved estimates of population characteristics related to program participation.

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the program agency and the Census Bureau, respectively:

Program agency POC:

Erol Fetahagic
HMIS System Administrator and Analyst
Coalition for the Homeless of Houston/Harris County
600 Jefferson, suite 2050
Houston, TX 77002
832-531-6013
efetahagic@homelesshouston.org

Census Bureau POC:

Dr. Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement shall terminate five (5) years following the date on which it becomes effective. If, at the end of five (5) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, in order to determine whether it should be revised, renewed or canceled. The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the program agency.

Notwithstanding all other provisions of this agreement, the Parties agree that:

- a. This agreement may be amended at any time by written mutual consent of both parties.
- b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

The original program data received from the program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the program agency establishes a different timetable as clarified, when necessary, in Section 3. Terms and

Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of program records with linkage identifiers and data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

7. CONFIDENTIALITY

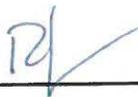
The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 *"Recommended Security Controls for Federal Information Systems and Organizations,"* as well as Special Publication 800-37r1 *"Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach."* The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the Chief Information Officer ("CIO"), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "Standards for Security Categorization of Federal Information and Information Systems" and NIST Special Publication 800-60r1 "Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices." Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team ("US CERT"). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

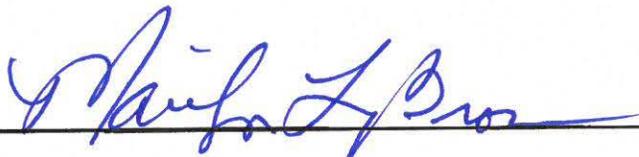
8. APPROVALS



3/30/16

Ron Jarmin
Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

(Date)



03.31.2016

Marilyn Brown
President/CEO
Coalition for the Homeless of Houston/Harris County

(Date)

Attachment A: Data Elements

1. Data Requirements

Data from the administration of HMIS for the years 2004–2021 will include, when available:

- a. Case unit identifiers,
- b. Complete monthly case unit address history (residence, mailing),
- c. History of benefit amounts received (monthly),
- d. Income reporting requirement (simplified reporting, change reporting, etc.),
- e. Gross income (monthly),
- f. Net income (monthly),
- g. Eligibility and denial information,
- h. Identifiers for individuals in case units, and
- i. The following information on individuals in a case unit:
 - i. Name
 - ii. Social Security Number
 - iii. Case unit/main contact phone number
 - iv. Relationship to primary recipient
 - v. Race
 - vi. Hispanic origin/Ethnicity
 - vii. Sex
 - viii. Date of birth
 - ix. Education
 - x. Employment
 - xi. History of membership in case unit (i.e. all shelter entry and exit dates).

Attachment B: Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using Program and Federal Administrative Records

The U.S. Census Bureau administers multiple household surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the program data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state and federal programs (including the program data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing likely eligible non-participants of SNAP

Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to

each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

- A. validating and enhancing the Master Address File (MAF);¹
- B. designing and assigning resources to carry out the 2020 Census;²
- C. unduplicating public, private, and census lists; and
- D. imputing missing data.³

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

¹ Examples of possible Census Bureau uses include updating and evaluating the Master Address File.

² Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.

³ Examples of possible Census Bureau uses include Item Imputation and count imputation using information from a composite of public and private data sources.

SPECIAL AGREEMENT
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
WOMEN, INFANTS, AND CHILDREN ADMINISTRATIVE DATA
FROM
THE INDIANA STATE DEPARTMENT OF HEALTH

Agreement # [2064-FY19-NFE-0216]

1. PARTIES AND PURPOSE

This Agreement establishes a relationship between the U.S. Census Bureau (Census Bureau) and the Indiana State Department of Health for the acquisition of Women, Infants, and Children (WIC) Administrative Data from the Indiana WIC program.

2. AUTHORITY

The authority for the Census Bureau to enter into this Agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the Indiana State Department of Health to share WIC data and enter into this Agreement is Section 17 of the Child Nutrition Act of 1966, 42 U.S.C. § 1786 and implementing regulations at 7 CFR Part 246. WIC regulations at 7 CFR 246.26(d)(1)(ii) limit the disclosure of WIC recipient information to those directly connected with the administration or enforcement of the WIC program. The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on October 24, 2017, has determined that the Census Bureau is directly connected with the administration of the WIC program because Census will provide to the state copies of its research tabulations for the state to use in administering its WIC program.

3. TERMS AND CONDITIONS

Pursuant to this Agreement, the Indiana State Department of Health hereinafter referred to as "the state program agency", will transfer records to the Census Bureau from the administration of WIC, hereinafter referred to as "the state data" and as described in Attachment A of this Agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and those Special Sworn Status (SSS) researchers participating in the projects will have access to the data. Access shall be limited to the minimum number of individuals necessary. Any data, records, or other information shared through this research Agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it will not be disclosed in individually-identifiable form that permits the identification of any individual respondents, businesses, organizations, or institutions, and results will meet

Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. To the extent provided by law, the Census Bureau will recognize the state program agency as the owner of the original data in the form that it is delivered to the Census Bureau, prior to its integration with confidential Census data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

- i. To transfer an encrypted, password-protected zip file to the Census Bureau via secure FTP (File Transfer Protocol) using the Census Bureau's SFTP site, data from the administration of WIC for January 2017— September 2020, as described in Attachment A.
- ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this Agreement; including active participant definitions, a record layout, record count, and record length.
- iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers will not contain any state data or direct identifiers.
- iv. To allow the Census Bureau staff and Special Sworn Status (SSS) researchers to use the state data at the Processing Sites listed in Section 4 of this Agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this Agreement.

b. The Census Bureau agrees:

- i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this Agreement and only for the projects listed in Attachment B or those approved in writing by both parties.
- ii. To provide the state program agency with a copy of data tabulations that the Census Bureau will create for Census research purposes. Specifically, the Census Bureau will provide the state program agency with data tabulations based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American Community Survey (ACS). Data tabulations shall include estimated rates of program eligibility and access/participation for the state overall and by various demographic, economic, and household characteristics and by county when the data allow. It also will include distributions across the same characteristics both for program participants and for those who are estimated to be eligible but do not participate. The data tabulations will be delivered either within six (6) months from the date that the state administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.

- iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to WIC and resulting from use under this Agreement of the state data. If no comments are received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this Agreement.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this Agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the Agreement to prevent unauthorized use. The parties mutually agree that the following locations are designated for data processing, analysis, and storage within the Census Network:

Sites: Bowie Computer Center or Other Approved Census Computer Centers
 Suitland Federal Center
 Federal Statistical Research Data Centers
 Census Approved Cloud Services

The parties mutually agree that the following named individuals will be designated as points of contact for the Agreement on behalf of the state program agency and the Census Bureau, respectively:

Indiana WIC POC:

Laura Chavez
WIC Director
Indiana State Department of Health
2 N Meridian St
Indianapolis, IN 46204
(317) 234-6158
LChavez2@isdh.IN.gov

Census Bureau POC:

Michael Berning
Assistant Division Chief
Data Acquisition and Curation
Economic Reimbursable Surveys Division
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-2028
michael.a.berning@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This Agreement is effective on the date on which it is signed by both parties. The Agreement will terminate two (2) years following the date on which it becomes effective. If, at the end of two (2) years, the parties wish to continue the relationship, they must execute a new agreement.

Notwithstanding all other provisions of this Agreement, the Parties agree that:

- a. This Agreement may be amended at any time by written mutual consent of both parties.
- b. Either party may terminate this Agreement upon thirty (30) days written notice to the other party.

To the extent permitted by federal law, the original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3, Terms and Conditions. Any revisions to the data retention timetable after the execution of this Agreement will be stated in writing in an amendment to this Agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this Agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this Agreement.

To promote organizational transparency, and in support of data discovery for current and future research projects, the U.S. Census Bureau posts non-sensitive data documentation to public-facing websites. This documentation, such as a record layout or data dictionary, can include file descriptions, variable lists, variable labels and valid values for each variable.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this Agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this Agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this Agreement, whether written, printed, recorded,

produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

The Census Bureau will promptly consider and adjudicate, in accordance with Federal law, claims which may arise for damages of any nature arising out of a Census Bureau act under this Agreement. Such adjudication will be pursued under the Federal Tort Claims Act, 28 U.S.C. Section 2671 et seq., the Federal Employees Compensation Act, 5 U.S.C. Section 8101 et seq., or such other legal authority as may be pertinent. The U.S. Department of Justice shall determine the appropriate venues for any litigation arising under this Agreement.

7. CONFIDENTIALITY

A. IT Security

The Census Bureau will comply with all federal laws applicable to the privacy or security of data received pursuant to this Agreement. As a federal agency, the Census Bureau is not subject to state laws, however the Census Bureau will comply with the requirements of applicable state laws to the extent that they do not conflict with the Census Bureau's requirements under federal law.

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, United States Code. The data provided under this Agreement are confidential under 13, U.S.C. § 9. Per the Federal Cybersecurity Enhancement Act of 2015, these data are also protected from cybersecurity risks through screening of the systems that transmit the data. Upon receipt, all data acquired as a result of this Agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 *"Recommended Security Controls for Federal Information Systems and Organizations,"* as well as Special Publication 800-37r1 *"Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach."* The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO (Chief Information Officer), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 *"Standards for Security Categorization of Federal Information and Information Systems"* and NIST Special Publication 800-60r1 *"Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices."* Security controls and subsequent assessments are to be completed based on the final categorization.

Cloud providers must be approved for at least moderate level information through the GSA FedRAMP process prior to acquiring any services. Census Bureau identifies, assesses and authorizes use based on the published FedRAMP results

and an assessment of any Census Bureau (customer provided) controls implemented to protect the infrastructure and data. Security reporting on cloud providers is reported to the Department of Commerce on a regular basis under FISMA.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum M-17-12. Known or suspected losses of protected data are to be reported within one (1) hour of its discovery to the Bureau of the Census Computer Incident Response Team (BOC CIRT) who will report as required to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau becomes aware of a known breach of the State Data, the Census Bureau will contact the state program agency contacts to discuss the actions and potential remedies regarding the incident.

B. Disclosure Avoidance Review of Statistical Products

Title 13, Section 9 of the United States Code (U.S.C.) requires the Census Bureau to keep confidential the information collected from the public under the authority of Title 13. Section 214 of Title 13, U.S.C., and Sections 3551, 3559 and 3571 of Title 18, U.S.C., provide for the imposition of penalties of up to five years in prison and/or up to \$250,000.00 in fines for wrongful disclosure of confidential census information.

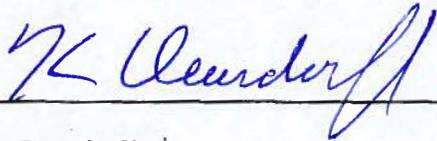
Disclosure avoidance is the process for protecting the confidentiality of data, as required under Title 13 U.S.C. A disclosure of data occurs when someone can use published statistical information to identify an individual who has provided confidential information under a pledge of confidentiality. For data tabulations, the Census Bureau uses disclosure avoidance procedures to modify or remove the characteristics that put confidential information at risk for disclosure. Although a published table may appear to show information about a specific individual, the Census Bureau has taken steps to disguise or suppress the original data, while making sure the results are still useful. The techniques used by the Census Bureau to protect confidentiality in tabulations vary, depending on the type of data.

Noise Infusion is the Census Bureau's preferred disclosure avoidance technique. By policy, noise infusion is applied to all data products that are reported with geographies smaller than a state. Noise infusion may be required for microdata releases, depending on the characteristics of the microdata and the specific variables that are to be released. Data that cannot be publicly released may still be analyzed within the Federal Statistical Research Data Centers (FSRDCs) by individuals who have Special Sworn Status; the results of such analyses must still go through a disclosure avoidance process prior to being publicly released.

The parties understand that Title 13 confidentiality protection and disclosure avoidance techniques apply to all work described in this Agreement. The disclosure avoidance disclosure methods are defined by the Census Bureau which has the responsibility of carrying out that work. Accordingly, upon completion of the tabulation, the data produced must be reviewed by the Census Bureau to ensure that no identifiable Title 13 data are or may be disclosed. Should the Census Bureau's Disclosure Review Board (DRB) determine that the requested statistical product does or reasonably could result in such disclosure, then the data product will be modified prior to approval for release to the party(ies) to this Agreement. The DRB must

approve before a research product can be released to an individual who does not have SSS and a need to know, or moved to a computer not approved for controlled data according to Census' existing policies and procedures.

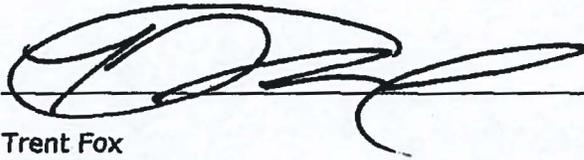
8. APPROVALS



3/1/19

Kevin Deardorff
Chief, Economic Reimbursable Surveys Division
U.S. Census Bureau

(Date)



2/14/19

Trent Fox
Chief of Staff
Indiana State Department of Health

(Date)

Attachment A: Data Elements

1. Data Requirements

Monthly data from the administration of WIC for January 2017—September 2020 will include, when available:

- a. Case unit identifiers,
- b. Active Participant definitions,
- c. Complete monthly case unit address history (residence, mailing),
- d. Monthly Benefits data (any of the available: benefits received date, benefits amount issued/received, and benefit amount redeemed),
- e. Income reporting requirement (simplified reporting, change reporting, etc.),
- f. Income (monthly),
- g. Eligibility and denial information,
- h. Identifiers for individuals in case units, and
- i. The following information on individuals in a case unit:
 - i. Name
 - ii. Case unit/main contact phone number
 - iii. Relationship to primary recipient
 - iv. Recipient or Caretaker phone number
 - v. Race
 - vi. Hispanic origin/Ethnicity
 - vii. Sex
 - viii. Date of birth
 - ix. Gross income (monthly)
 - x. Net Income (monthly)
 - xi. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)
 - xii. Education
 - xiii. Employment

Attachment B: Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records

The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of state programs in the American Community Survey (ACS), the Current Population Survey (CPS) and the Survey of Income and Program Participation (SIPP). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing WIC participants and likely eligible non-participants of WIC

WIC data linked to ACS data can provide characteristic information for women, infants, and children participating in the WIC program. Additionally, infants and children with a high probability of being eligible for WIC can be estimated using ACS information on family structure, reported income, and public assistance.¹ The estimated eligible infants and children can be matched to the administrative WIC data to determine who is estimated to be eligible but not participating in the program, helping agencies determine unmet need. The project results can help state agencies improve outreach efforts. This research helps the Census Bureau better understand their survey and census data.

3. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System (PVS) uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records. However, coverage for

¹ Eligible pregnant and breastfeeding women cannot be identified in ACS data.

some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

- A. validating and enhancing the Master Address File (MAF);²
- B. designing and assigning resources to carry out the 2020 Census;³
- C. unduplicating public, private, and census lists; and
- D. imputing missing data.⁴

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American population and economy. As Census and other Federal Statistical Agencies successfully

² Examples of possible Census Bureau uses include updating and evaluating the Master Address File.

³ Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.

⁴ Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE INDIANA FAMILY & SOCIAL SERVICES ADMINISTRATION (FSSA)

Agreement No. [0094-FY16-NFE-0055]

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Indiana Family & Social Services Administration (FSSA) for the acquisition of Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF) data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the Indiana Family & Social Services Administration (FSSA) to share SNAP data and enter into this agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026. The Food and Nutrition Act of 2008 limits the use of SNAP recipient information to those directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the SNAP program because Census will provide to the state copies of its tabulations of the data for the state to use in administering its SNAP program.

The authority for the Indiana Family & Social Services Administration (FSSA) to share TANF data and enter into this agreement is the Public Health and Welfare Act, 42 U.S.C. § 613.

Additional authority for the Indiana Family & Social Services Administration (FSSA) to enter into this agreement is 45 CFR 5b.9(b).

3. TERMS AND CONDITIONS

Pursuant to this agreement, the Indiana Family & Social Services Administration (FSSA), hereinafter referred to as "the state program agency" shall transfer records to the Census Bureau from the administration of SNAP and TANF, hereinafter referred to as "the state data" and as described in Attachment A of this agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13

U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and Special Sworn Status ("SSS") researchers will have access to the data. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it may not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

- i. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of SNAP and administration of TANF for the years 2004—2021, as described in Attachment A.
- ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, record length and data dictionary.
- iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers may not contain any state data or direct identifiers.

Research projects exploring whether the administrative records represent the same individuals in survey or census households may need access to name data. Access to name data will only be granted through approval by the Census Bureau Data Stewardship Executive Policy Committee. Researchers may not have access to Social Security Numbers.

- iv. To allow the Census Bureau staff and SSS researchers to use the state data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

- i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.
- ii. To provide the state program agency a table package based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American

Community Survey (ACS). A table package shall include estimated rates of program eligibility and access/participation for the state overall and by various demographic, economic, and household characteristics and by county when the data allow. It also will include distributions across the same characteristics both for program participants and for those who are estimated to be eligible but do not participate. The table package will be delivered either within six (6) months from the date that the state administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.

- iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to SNAP and TANF and resulting from use under this agreement of the state data. If no comments are received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this agreement.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the agreement to prevent unauthorized use.

Processing Sites: Bowie Computer Center
 Suitland Federal Center
 Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency POC:

Adrienne M. Shields
Director, Division of Family Resources
Family & Social Services Administration/DFR
402 West Washington Street, Room W-392
Indianapolis, IN 46204
(317) 234-2373
Adrienne.Shields@fssa.in.gov

Census Bureau POC: Dr. Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement shall terminate six (6) years following the date on which it becomes effective. If, at the end of six (6) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, in order to determine whether it should be revised, renewed or canceled. The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Notwithstanding all other provisions of this agreement, the Parties agree that:

- a. This agreement may be amended at any time by written mutual consent of both parties.
- b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

The original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3. Terms and Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with

linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

7. CONFIDENTIALITY

45 CFR Part 5b – PRIVACY ACT REGULATIONS protect the confidentiality of the state data, as well as:

- Medicaid, 42 U.S.C. § 1396(a)(a)(7), 42 CFR Part 431.300-307;
- Temporary Assistance to Needy Families, 42 U.S.C. § 602 (a)(1)(A)(iv);
- Supplemental Nutrition Assistance Program, 7 U.S.C. § 2020 (e)(8);
- 7 CFR Part 272.1(c);
- Social Security Act, 42 U.S.C. § 1396(a)(a)(7);
- Social Security Administration Disclosure, 20 CFR Part 401;
- Child Support, 42 U.S.C. § 654(26);
- Public Assistance Programs (Public Welfare), 45 CFR Part 205.50; and
- U.S. Department of Labor Employment and Training Administration, 20 CFR Part 603.

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal*

Information Systems: A Security Life Cycle Approach." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the Chief Information Officer ("CIO"), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices.*" Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team ("US CERT"). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

8. APPROVALS



6/30/16

Ron Jarmin
Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

(Date)



6/21/16

John J. Wernert, M.D., MHA
Secretary
Family & Social Services Administration

(Date)

Attachment A: Data Elements

1. Data Requirements

Data from the administration of SNAP and TANF for the years 2004–2021 will include, when available, but not limited to:

- a. Case unit identifiers,
- b. Complete monthly case unit address history (residence, mailing),
- c. History of benefit amounts received (monthly),
- d. Income reporting requirement (simplified reporting, change reporting, etc.),
- e. Gross income (monthly),
- f. Net income (monthly),
- g. Eligibility and denial information,
- h. Identifiers for individuals in case units, and
- i. The following information on individuals in a case unit:
 - i. Name
 - ii. Social Security Number
 - iii. Case unit/main contact phone number
 - iv. Relationship to primary recipient
 - v. Race
 - vi. Hispanic origin/Ethnicity
 - vii. Sex
 - viii. Date of birth
 - ix. Education
 - x. Employment
 - xi. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)
 - xii. History of membership in case unit

Attachment B: Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records

The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of state programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing likely eligible non-participants of SNAP

Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to

each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

- A. validating and enhancing the Master Address File (MAF);¹
- B. designing and assigning resources to carry out the 2020 Census;²
- C. unduplicating public, private, and census lists; and
- D. imputing missing data.³

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American

1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.

2 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.

3 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE STATE OF CONNECTICUT DEPARTMENT OF SOCIAL SERVICES

Agreement No. [2064-18-PAY-15]

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the State of Connecticut Department of Social Services (DSS) for the acquisition of Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF) data.

2. AUTHORITY

The authority for the Census Bureau to enter into this Agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the DSS to share SNAP data and enter into this Agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026. The Food and Nutrition Act of 2008 limits the use of SNAP recipient information to those directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on October 24, 2017, has determined that the Census Bureau is directly connected with the administration of the SNAP program because Census will provide to the state copies of its research tabulations for the state to use in administering its SNAP program.

The authority for the DSS to share TANF data and enter into this Agreement is consistent with Section 1137 of the Social Security Act and Section 205.50 of Title 45, Code of Federal Regulations.

Additional authority for the DSS to enter into this Agreement is Conn. Gen. Stat. § 17b-3.

3. TERMS AND CONDITIONS

Pursuant to this Agreement, the DSS, hereinafter referred to as "the state program agency" shall transfer records to the Census Bureau from the administration of SNAP and TANF, hereinafter referred to as "the state data" and as described in Attachment A of this Agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and those Special Sworn Status (SSS) researchers participating in the projects will have access to the data. Access shall be limited to the minimum number of individuals necessary. Any data, records, or other information shared

through this research Agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it may not be disclosed in individually-identifiable form that permits the identification of any individual respondents, businesses, organizations, or institutions, and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. To the extent provided by law, the Census Bureau will recognize the state program agency as the owner of the original data in the form that it is delivered to the Census Bureau, prior to its integration with confidential Census data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

- i. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of SNAP and administration of TANF for the years 2004-2022, as described in Attachment A.
- ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this Agreement; including active participant definitions, a record layout, record count, record length and data dictionary.
- iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers may not contain any state data or direct identifiers.
- iv. To allow the Census Bureau staff and SSS researchers to use the state data at the Processing Sites listed in Section 4 of this Agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this Agreement.

b. The Census Bureau agrees:

- i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this Agreement and only for the projects listed in Attachment B or those approved in writing by both parties.
- ii. To provide the state program agency with a copy of data tabulations that the Census Bureau will create for Census research purposes. Specifically, the Census Bureau will provide the state program agency with data tabulations based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American Community Survey (ACS). Data tabulations shall include estimated rates of program eligibility and access/participation for the state overall and by various demographic, economic, and household characteristics and by county when the data allow. It also will include distributions across the same characteristics both for program participants

and for those who are estimated to be eligible but do not participate. The data tabulations will be delivered either within six (6) months from the date that the state administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.

- iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to SNAP and TANF and resulting from use under this Agreement of the state data. If no comments are received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this Agreement.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this Agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the Agreement to prevent unauthorized use. The parties mutually agree that the following locations are designated for data processing, analysis, and storage within the Census Network:

Sites: Bowle Computer Center or Other Approved Census Computer Centers
 Suitland Federal Center
 Federal Statistical Research Data Centers
 Census Approved Cloud Services

The parties mutually agree that the following named individuals will be designated as points of contact for the Agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency POC:

Peter Hadler
Program Administration Manager
Department of Social Services
55 Farmington Avenue
Hartford, CT 06105
(860) 424-5385
peter.hadler@ct.gov

Census Bureau POC: Michael Berning
Assistant Division Chief
Data Acquisition and Curation
Economic Reimbursable Surveys Division
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-2028
michael.a.berning@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. FUNDING

The total amount to be paid by the Census Bureau to the state program agency via Electronic Funds Transfer (EFT) is \$20,000.00. Funding is provided as financial support to reimburse the state program agency for resources needed to develop, set up, complete the data extraction, and deliver an initial production file within the first two years of this Agreement, as described in Attachment C. The funding is only obligated for Task 1 in the Statement of Work (Attachment C) and an invoice must be submitted immediately following the completion of Task 1 and the funds must be transferred prior to September 30, 2021. Tasks 2-4 will be completed on a no-funds-exchanged basis. This Agreement is considered to be a firm commitment.

6. ACCOUNTING DATA

State Agency Accounting Data:

DUNS No.: **807854435**

EIN: **06-6000798**

Census Bureau Accounting Data:

Agency Location Code: **13-04-0001**

Project Code: **7008016**

Division Code: **2064**

Object Class Code: **25-30-07-00**

TAS: **013-X-4512-000**

Business Event Type Code (BETC): **DISB**

Funds Expiration: **9/30/2016**

Funds Cancellation Date: **9/30/2021**

Organization Code: **11-26-2064-00-00-00-01**

DUNS No.: **929955383**

EIN: **52-0204537**

Total Amount: **\$20,000**

Agreement No.: **2064-18-PAY-15**

7. FINANCIAL POINTS OF CONTACT

State Agency Financial Contact: Michael Gilbert
Chief Financial Officer
Department of Social Services
55 Farmington Avenue
Hartford, CT 06105
(860) 424-5841
mike.gilbert@ct.gov

Census Bureau Financial Contact: Darrell Blyden
Chief, Financial Services Center
Finance Division
U.S. Census Bureau
4600 Silver Hill Road
Washington, DC 20233
(301) 763-4390
Darrell.b.blyden@census.gov

8. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This Agreement is effective on the date on which it is signed by both parties. The Agreement shall terminate six (6) years following the date on which it becomes effective or December 31, 2024, whichever comes first. If, at the end of the Agreement, the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this Agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the Agreement, in order to determine whether it should be amended, renewed or canceled. The review will be conducted by the Census Bureau's Assistant Director for Economic Programs and the state program agency.

Notwithstanding all other provisions of this Agreement, the Parties agree that:

- a. This Agreement may be amended at any time by written mutual consent of both parties.
- b. Either party may terminate this Agreement upon thirty (30) days written notice to the other party.

To the extent permitted by federal law, the original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3, Terms and Conditions. Any revisions to the data retention timetable after the execution of this Agreement will be stated in writing in an amendment to this Agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this Agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this Agreement.

To promote organizational transparency, and in support of data discovery for current and future research projects, the U.S. Census Bureau posts non-sensitive data documentation to public-facing websites. This documentation, such as a record layout or data dictionary, can include file descriptions, variable lists, variable labels and valid values for each variable.

9. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this Agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5 U.S.C. App. 3, a review of this Agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this Agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

The Census Bureau will promptly consider and adjudicate, in accordance with Federal law, claims which may arise for damages of any nature arising out of a Census Bureau act under this Agreement. Such adjudication will be pursued under the Federal Tort Claims Act, 28 U.S.C. Section 2671 et seq., the Federal Employees Compensation Act, 5 U.S.C. Section 8101 et seq., or such other legal authority as may be pertinent. The U.S. Department of Justice shall determine the appropriate venues for any litigation arising under this Agreement.

10. CONFIDENTIALITY

A. IT Security

Connecticut General Statutes protect the confidentiality of the state data, including but not limited to Conn. Gen. Stat. § 17b-90, as well as:

- Medicaid, 42 U.S.C. § 1396a(a)(7), 42 CFR Part 431.300-307;
- Temporary Assistance to Needy Families, 42 U.S.C. § 602 (a)(1)(A)(iv);
- Supplemental Nutrition Assistance Program, 7 U.S.C. § 2020 (e)(8);
- 7 CFR Part 272.1(c);
- Social Security Act, 42 U.S.C. § 1396(a)(a)(7);
- Social Security Administration Disclosure, 20 CFR Part 401;

- Child Support, 42 U.S.C. § 654(26);
- Public Assistance Programs (Public Welfare), 45 CFR Part 205.50; and
- U.S. Department of Labor Employment and Training Administration, 20 CFR Part 603.

The Census Bureau will comply with all federal laws applicable to the privacy or security of data received pursuant to this Agreement. As a federal agency, the Census Bureau is not subject to state laws, however the Census Bureau will comply with the requirements of applicable state laws to the extent that they do not conflict with the Census Bureau's requirements under federal law.

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, United States Code. The data provided under this Agreement are confidential under 13, U.S.C. § 9. Per the Federal Cybersecurity Enhancement Act of 2015, these data are also protected from cybersecurity risks through screening of the systems that transmit the data. Upon receipt, all data acquired as a result of this Agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO (Chief Information Officer), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*." Security controls and subsequent assessments are to be completed based on the final categorization.

Cloud providers must be approved for at least moderate level information through the GSA FedRAMP process prior to acquiring any services. Census Bureau identifies, assesses and authorizes use based on the published FedRAMP results and an assessment of any Census Bureau (customer provided) controls implemented to protect the infrastructure and data. Security reporting on cloud providers is reported to the Department of Commerce on a regular basis under FISMA.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum M-17-12. Known or suspected losses of protected data are to be reported within one (1) hour of its discovery to the Bureau of the Census Computer Incident Response Team (BOC CIRT) who will report as required to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau becomes aware of a known

breach of the State Data, the Census Bureau will contact the state program agency contacts to discuss the actions and potential remedies regarding the incident.

B. Disclosure Avoidance Review of Statistical Products

Title 13, Section 9 of the United States Code (U.S.C.) requires the Census Bureau to keep confidential the information collected from the public under the authority of Title 13. Section 214 of Title 13, U.S.C., and Sections 3551, 3559 and 3571 of Title 18, U.S.C., provide for the imposition of penalties of up to five years in prison and/or up to \$250,000.00 in fines for wrongful disclosure of confidential census information.

Disclosure avoidance is the process for protecting the confidentiality of data, as required under Title 13 U.S.C. A disclosure of data occurs when someone can use published statistical information to identify an individual who has provided confidential information under a pledge of confidentiality. For data tabulations, the Census Bureau uses disclosure avoidance procedures to modify or remove the characteristics that put confidential information at risk for disclosure. Although a published table may appear to show information about a specific individual, the Census Bureau has taken steps to disguise or suppress the original data, while making sure the results are still useful. The techniques used by the Census Bureau to protect confidentiality in tabulations vary, depending on the type of data.

Noise infusion is the Census Bureau's preferred disclosure avoidance technique. By policy, noise infusion is applied to all data products that are reported with geographies smaller than a state. Noise infusion may be required for microdata releases, depending on the characteristics of the microdata and the specific variables that are to be released. Data that cannot be publicly released may still be analyzed within the Federal Statistical Research Data Centers (FSRDCs) by individuals who have Special Sworn Status; the results of such analyses must still go through a disclosure avoidance process prior to being publicly released.

The parties understand that Title 13 confidentiality protection and disclosure avoidance techniques apply to all work described in this Agreement. The disclosure avoidance disclosure methods are defined by the Census Bureau which has the responsibility of carrying out that work. Accordingly, upon completion of the tabulation, the data produced must be reviewed by the Census Bureau to ensure that no identifiable Title 13 data are or may be disclosed. Should the Census Bureau's Disclosure Review Board (DRB) determine that the requested statistical product does or reasonably could result in such disclosure, then the data product will be modified prior to approval for release to the party(ies) to this Agreement. The DRB must approve before a research product can be released to an individual who does not have SSS and a need to know, or moved to a computer not approved for controlled data according to Census' existing policies and procedures.

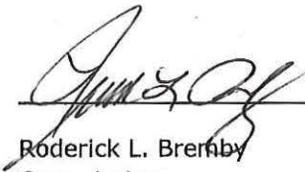
11. APPROVALS



10/29/18

Kevin Deardorff
Chief, Economic Reimbursable Surveys Division
U.S. Census Bureau

(Date)



11/14/18

Roderick L. Brenby
Commissioner
Connecticut Department of Social Services

(Date)

Attachment A: Data Elements

1. Data Requirements

Monthly data from the administration of SNAP and TANF for the years 2004-2022 will include, when available:

- a. Case unit identifiers,
- b. Active Participant definitions,
- c. Complete monthly case unit address history (residence, mailing),
- d. Monthly Benefits data (any of the available: benefits received date, benefits amount issued/received, and benefit amount redeemed),
- e. Income reporting requirement (simplified reporting, change reporting, etc.),
- f. Gross income (monthly),
- g. Net income (monthly),
- h. Eligibility and denial information,
- i. Identifiers for individuals in case units,
- j. Benefit certification period,
- k. Primary language, and
- l. The following information on individuals in a case unit:
 - i. Name
 - ii. Social Security Number
 - iii. Case unit/main contact phone number
 - iv. Relationship to primary recipient
 - v. Race
 - vi. Hispanic origin/Ethnicity
 - vii. Sex
 - viii. Date of birth
 - ix. Gross income (monthly)
 - x. Net Income (monthly)
 - xi. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)
 - xii. Education
 - xiii. Employment
 - xiv. Penalty data
 - xv. Work status
 - xvi. Disability
 - xvii. Reasonable accommodations

Attachment B: Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records

The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of state programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing likely eligible non-participants of SNAP

Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to

each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

- A. validating and enhancing the Master Address File (MAF);¹
- B. designing and assigning resources to carry out the 2020 Census;²
- C. unduplicating public, private, and census lists; and
- D. imputing missing data.³

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American

1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.

2 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.

3 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

Attachment C: Statement of Work SNAP and TANF Data Extraction

**Statement of Work
for the
U.S. Census Bureau Funding of the Data Extraction by the
Connecticut Department of Social Services for
SNAP and TANF Administrative Data**

Under the referenced MOU [2064-18-PAY-15] through which the Census Bureau is acquiring SNAP and TANF Administrative Data from the Connecticut Department of Social Services ("DSS"), Census Bureau funding reimburses the DSS efforts to develop a process to analyze, design and extract SNAP and TANF data for the years 2004-2022, by providing funds to develop a process to complete the following tasks:

Task 1 – Analysis, Design, and Initial File Delivery

Through this task, the DSS has agreed to develop a process to provide SNAP and TANF recipient data to the US Census Bureau. This data exists in - DSS EMS and ImpaCT computer systems. While there is no charge for the data, a considerable amount of design, programming, and testing work is needed to extract the data elements needed by the Census Bureau and create a series of "flat files" for transmission to the Census Bureau. DSS will develop a process to extract SNAP and TANF case and client details for January 1, 2004 through September 2016, create a test file, review the file for accuracy, and provide it to the Census Bureau, along with a data dictionary and record layout, or other similar documentation. Analysis, design, and testing is expected to be completed by January 1, 2019, with delivery of an initial test file expected to be completed by January 1, 2019.

Task 2 – Delivery of 2004-2016 Data

Through this task, the data from January 2004 through September 2016 can be provided after Task 1 is complete. This is expected to be completed by January 1, 2020.

Task 3 – Delivery of 2016-2018 Data

Through this task, the October 2016 – December 2018 data can be provided after Task 2 is complete. This is expected to be completed by July 1, 2020. DSS may

provide the Census Bureau with two separate files per month for this timeframe – one file from each of two computer systems – because relevant data will be obtained from two separate systems and may not readily be combined into a single file.

Task 4 – Delivery of 2019-2022 Data

Through this task, the 2019-2022 data can be provided after Task 3 is complete. Once the file query for Task 4 is developed, DSS expects to provide Census Bureau with monthly files within 90 days of each monthly query (such that the last monthly data from 2019 will be provided by the end of March 2020). This entire task is expected to be completed by April 1, 2023.

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE LOS ANGELES HOMELESS SERVICES AUTHORITY

Agreement No. [0094-FY16-NFE-0045]

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Los Angeles Homeless Services Authority (LAHSA) for the acquisition of Homeless Management Information System (HMIS) data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for LAHSA to share HMIS data and enter into this agreement is based on the HMIS Data Use and Disclosure, Section 4.1.3 of the HMIS Rules and Procedures provided by the U.S. Department of Housing and Urban Development.¹

3. TERMS AND CONDITIONS

Pursuant to this agreement, LAHSA, hereinafter referred to as "the program agency" shall transfer records to the Census Bureau from the HMIS, hereinafter referred to as "the program data" and as described in Attachment A of this agreement. All data that the program agency agrees to provide the Census Bureau remains confidential. Maintaining confidentiality of these data is guaranteed under Title 13 U.S.C, Section 9, and the Privacy Act of 1974. Only Census Bureau staff and Special Sworn Status ("SSS") researchers will have access to the data. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes. When the Census Bureau publicly releases information related to this research, it may not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the program data to census data, survey data and administrative records data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the program data to provide new and improved estimates of population characteristics related to program participation.

¹ Section 4.1.3 Allowable HMIS Uses and Disclosures of Protected Personal Information (PPI), states in pertinent part: A Covered Homeless Organization may use or disclose PPI from an HMIS under the following circumstances: (1) To provide or coordinate services to an individual; (2) for functions related to payment or reimbursement for services; (3) to carry out administrative functions, including but not limited to legal, audit, personnel, oversight and management functions; or (4) for creating de-identified PPI.

a. The program agency agrees:

- i. On an annual basis, to transfer to the Census Bureau via secure File Transfer Protocol (FTP), or appropriately encrypted CD-ROM or DVD-ROM, data from the HMIS for the years 2004–2021. The data to be transferred is described in Attachment A.
- ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, record length and data dictionary.
- iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the program data. Record linkage identifiers may not contain any program data or direct identifiers.

Research projects exploring whether the administrative records represent the same individuals in survey or census households may need access to name data. Access to name data will only be granted through approval by the Census Bureau Data Stewardship Executive Policy Committee. Researchers may not have access to Social Security Numbers.

- iv. To allow the Census Bureau staff and SSS researchers to use the program data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

- i. To the extent provided by law, to grant access to the program data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the agreement to prevent unauthorized use.

Processing Sites: Bowie Computer Center
 Suitland Federal Center
 Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the program agency and the Census Bureau, respectively:

Program agency POC:

Peter Lynn
Executive Director
Los Angeles Homeless Services Authority
811 Wilshire Boulevard, 6th Floor
Los Angeles, California 90017

Census Bureau POC:

Dr. Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date of the last party's signature. The agreement shall terminate six (6) years following the date on which it becomes effective. If, at the end of six (6) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, in order to determine whether it should be revised, renewed or canceled. The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the program agency.

Notwithstanding all other provisions of this agreement, the Parties agree that:

- a. This agreement may be amended at any time by written mutual consent of both parties.
- b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

The original program data received from the program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the program agency establishes a different timetable as clarified, when necessary, in Section 3. Terms and Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the data will not be discontinued due to the expiration

or termination of this agreement. Furthermore, the use of de-identified program records with linkage identifiers and data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

7. CONFIDENTIALITY

Confidentiality of HMIS data is covered by the HMIS Data Use and Disclosure Section of the HMIS Policies and Procedures provided by the U.S. Department of Housing and Urban Development. It states that the HMIS Lead Agency collects HMIS data from organizations that directly enter data into the HMIS with the knowledge and authority of the CoC Steering Committee. HMIS data may only be collected, used, or disclosed for activities described in the HMIS Data Use and Disclosure section of the HMIS Policies and Procedures.

The Census Bureau assumes an obligation to keep all data received from other federal and program agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the Chief Information Officer ("CIO"), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "Standards for Security Categorization of Federal Information and Information Systems" and NIST Special Publication 800-60r1 "Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices." Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team ("US CERT"). Once the Census Bureau becomes aware of a known breach of the program data, the Census Bureau will contact the identified program agency contacts within twenty-four (24) hours to discuss the actions and potential remedies regarding the incident.

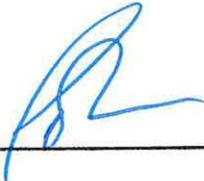
8. APPROVALS



5/25/14

Ron Jarmin
Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

(Date)



6/7/16

Peter Lynn
Executive Director
Los Angeles Homeless Services Authority

(Date)

Attachment A: Data Elements

1. Data Requirements

Data from the administration of HMIS for the years 2004—2021 will include, when available:

- a. HMIS identifier (HMIS ID)
- b. Client's Program Enrollment identifier (Application ID),
- c. Last known permanent address and client destination address
- d. Permanent Supportive Housing unit site address
- e. Total monthly income with income benefits and non-cash income sources,
- f. Identifier that groups individuals to one unique household (Household ID), and
- g. The following information on individuals in a household:
 - i. Name
 - ii. Head of Household status
 - iii. Social Security Number
 - iv. Household's main contact phone number
 - v. Relationship to Head of Household (primary recipient)
 - vi. Race
 - vii. Hispanic origin/Ethnicity
 - viii. Sex
 - ix. Date of birth
 - x. Education
 - xi. Employment and employment type (e.g. full-time vs. part-time)
 - xii. Program type (e.g. emergency shelter, permanent supportive housing)
 - xiii. Program name
 - xiv. Program entry and exit dates

Attachment B: Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using Program and Federal Administrative Records

The U.S. Census Bureau administers multiple household surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the program data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state and federal programs (including the program data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing likely eligible non-participants of SNAP

Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

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The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would

have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

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- B. designing and assigning resources to carry out the 2020 Census;³
- C. unduplicating public, private, and census lists; and
- D. imputing missing data.⁴

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of

² Examples of possible Census Bureau uses include updating and evaluating the Master Address File.

³ Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.

⁴ Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE FLORIDA DEPARTMENT OF CHILDREN AND FAMILIES

Agreement No. [FL DCF: ESS 2016-01]
[U.S. Census Bureau: 0094-2016-PAY-003]

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Florida Department of Children and Families for the acquisition of Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF) data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the Florida Department of Children and Families to share SNAP data and enter into this agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026. The Food and Nutrition Act of 2008 limits the use of SNAP recipient information to those directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the SNAP program because the Census Bureau will provide to the state copies of its tabulations of the data for the state to use in administering its SNAP program.

The authority for the Florida Department of Children and Families to share TANF data and enter into this agreement is the Public Health and Welfare Act, 42 U.S.C. § 613.

3. TERMS AND CONDITIONS

Pursuant to this agreement, the Florida Department of Children and Families, hereinafter referred to as "the state program agency" shall transfer records to the Census Bureau from the administration of SNAP and TANF, hereinafter referred to as "the state data" and as described in Attachment A of this agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and Special Sworn Status ("SSS") researchers will have access to the data. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes. When the Census Bureau publicly releases information related to this research, it

may not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

- i. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of SNAP and administration of TANF for the years 2009—2020, as described in Attachment A.
- ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, record length and data dictionary.
- iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers may not contain any state data or direct identifiers.

Research projects exploring whether the administrative records represent the same individuals in survey or census households may need access to name data. Access to name data will only be granted through approval by the Census Bureau Data Stewardship Executive Policy Committee. Researchers may not have access to Social Security Numbers.

- iv. To allow the Census Bureau staff and SSS researchers to use the state data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

- i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.
- ii. To provide the state program agency, within six (6) months of the time the state data is processed and provided to Census Bureau research staff, selected tabulations of the state SNAP and TANF data linked to the American Community Survey. SNAP profile tabulations shall describe the demographic and household characteristics of residents who are likely to be eligible for SNAP, but who do not participate in the program.
- iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to SNAP and TANF and resulting from use under this agreement of the state data. If no

comments are received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comments regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this agreement.

4. CONTACTS

The parties mutually agree that the following named individual is to be designated as custodian of the files on behalf of the Census Bureau and shall be personally responsible for the observance of all conditions of use, and for the establishment and maintenance of security arrangements to prevent unauthorized use, as specified in the agreement. The Census Bureau agrees to notify the state program agency within fifteen (15) days of any changes of custodianship.

Custodian: J. Trent Alexander
Data Custodian
U.S. Census Bureau
4600 Silver Hill Road, 2K133
Washington DC 20233
(301) 763-9810
j.trent.alexander@census.gov

Processing Sites: Bowie Computer Center
Suitland Federal Center
Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency POC:
Janice "JD" Johnson
Agreement Manager
Department of Children and Families
1317 Winewood Boulevard, Building 3, Room 461
(850) 717-4110
jd.johnson@myflfamilies.com

State program agency POC:
Peter Bull
Data Manager
Department of Children and Families
1317 Winewood Boulevard, Building 3, Room 424
(850) 717-4088
peter.bull@myflfamilies.com

Census Bureau POC: Dr. Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. FUNDING

The total amount to be paid by the Census Bureau to the state program agency via Electronic Funds Transfer (EFT) is \$20,000.00. Funding is provided to reimburse the state program agency for resources needed to set up and complete the data extraction as described in Attachment C. This Agreement is considered to be a firm commitment. The funding will be sent to the Florida Department of Children and Families within 60 days from the receipt of invoice by the Census Bureau.

6. ACCOUNTING DATA

State Agency Accounting Data:

Appropriation No.:

CAN:

DUNS No.: **6056043500000**

EIN: **59-3458463**

Total Amount:

Control Number:

Census Bureau Accounting Data:

Agency Location Code: **13-04-0001**

Project Code: **7008001**

Division Code: **0094**

Object Class Code: **25-30-07-00**

TAS: **013 X 4512 000**

Business Event Type Code (BETC): **DISB**

Funds Expiration: **No Year**

Funds Cancellation Date: **No Year**

Organization Code: **11-09-0094-00-00-00-00**

DUNS No.: **929955383**

EIN: **52-0204537**

Total Amount: **\$20,000.00**

Agreement No.: **0094-2016-PAY-003**

7. FINANCIAL POINTS OF CONTACT

State Agency Financial Contact: Joella McGoogan
Budget Liaison
Department of Children and Families
1317 Winewood Boulevard, Building 3, Room 102
(850) 717-4102
joella.mcgoogan@myflfamilies.com

Census Bureau Financial Contact: Darrell Blyden
Chief, Financial Services Center
Finance Division
U.S. Census Bureau
4600 Silver Hill Road
Washington, DC 20233
(301) 763-4390
Darrell.b.blyden@census.gov

8. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement shall terminate five (5) years following the date on which it becomes effective. If, at the end of five (5) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, in order to determine whether it should be revised, renewed or canceled. The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Notwithstanding all other provisions of this agreement, the Parties agree that:

- a. This agreement may be amended at any time by written mutual consent of both parties.
- b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

The original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3. Terms and Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original state data will be

expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

9. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law and DCF or other state and federal representatives shall have the right to make on-site inspections of records relevant to this agreement.

10. CONFIDENTIALITY

Pursuant to section 71A of the Florida Administrative Code and Chapters 39, 119, 812, 815, 817, 839, or 877, Florida Statutes which protects the confidentiality of the state data, as well as:

- Medicaid, 42 U.S.C. § 1396(a)(a)(7), 42 CFR Part 431.300-307;
- Temporary Assistance to Needy Families, 42 U.S.C. § 602 (a)(1)(A)(iv);
- Supplemental Nutrition Assistance Program, 7 U.S.C. § 2020 (e)(8);
- 7 CFR Part 272.1(c);
- Social Security Act, 42 U.S.C. § 1396(a)(a)(7);
- Social Security Administration Disclosure, 20 CFR Part 401;
- Child Support, 42 U.S.C. § 654(26);
- Public Assistance Programs (Public Welfare), 45 CFR Part 205.50; and
- U.S. Department of Labor Employment and Training Administration, 20 CFR Part 603.

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "Recommended Security Controls for Federal Information Systems and Organizations," as well as Special Publication 800-37r1 "Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the Chief Information Officer ("CIO"), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "Standards for Security Categorization of Federal Information and Information Systems" and NIST Special Publication 800-60r1 "Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices." Security controls and subsequent assessments are to be completed based on the final categorization.

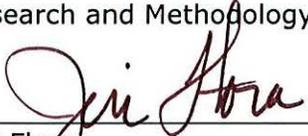
The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team ("US CERT"). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

11. APPROVALS



Ron Jarmin
Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

3/23/14
(Date)



Jeri Flora
Program Director
Economic Self-Sufficiency

3/23/16
(Date)



Joseph Vastola
Chief Information Officer
Office of Information Technology Services

3/24/16
(Date)

Attachment A: Data Elements

1. Data Requirements

Data from the administration of SNAP and TANF for the years 2009—2020 will include:

- a. Case unit identifiers,
- b. Residence address history (ZIP Code and County only),
- c. History of benefit amounts received (monthly),
- d. Eligibility and denial information,
- e. Identifiers for individuals in case units, and
- f. The following information on individuals in a case unit:
 - i. Name
 - ii. Relationship to primary recipient
 - iii. Race
 - iv. Hispanic origin/Ethnicity
 - v. Sex
 - vi. Date of birth
 - vii. History of membership in case unit

Attachment B: Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records

The U.S. Census Bureau administers multiple household surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of state programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing likely eligible non-participants of SNAP

Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to

each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

- A. validating and enhancing the Master Address File (MAF);¹
- B. designing and assigning resources to carry out the 2020 Census;²
- C. unduplicating public, private, and census lists; and
- D. imputing missing data.³

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.

2 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.

3 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

Attachment C: Statement of Work Funding SNAP and TANF Data Extraction

Statement of Work

for

**the U.S. Census Bureau Funding of the Data Extraction by the
Florida Department of Children and Families for
SNAP and TANF Administrative Data**

Under the referenced FL DCF agreement # ESS 2016-01/Census Bureau agreement # 0094-2016-PAY-003 through which the Census Bureau is acquiring SNAP and TANF Administrative Data from the Florida Department of Children and Families, Census Bureau funding reimburses the Florida Department of Children and Families' efforts to extract SNAP and TANF data for the years 2009-2020, by providing funds to complete the following tasks:

Task 1 – Analysis, Design, and Initial File Delivery

Through this task, the Florida Department of Children and Families (DCF) has agreed to provide SNAP and TANF recipient data to the US Census Bureau. This data exists in the Florida Online Receipt Integrated Data Access (FLORIDA) System mainframe. While there is no charge for the data, a considerable amount of design, programming, and testing work is needed to extract the data elements needed by the Census Bureau and create a series of "flat files" for transmission to the Census Bureau. DCF shall extract SNAP and TANF case and client details for CY2009 through CY2015, create a series of files, review the files for accuracy, and provide them to the Census Bureau, along with a data dictionary and record layout, or other similar documentation. This task is expected to be completed by Spring/April 2016 with delivery of all CY2009-CY2015 files.

Task 2 – Delivery of 2016 Data

Through this task, the CY2016 data can be provided after CY2016 is complete. This is expected to be completed by January 31, 2017.

Task 4 – Delivery of 2017 Data

Through this task, the CY2017 data can be provided after CY2017 is complete. This is expected to be completed by January 31, 2018.

Task 5 – Delivery of 2018 Data

Through this task, the CY2018 data can be provided after CY2018 is complete. This is expected to be completed by January 31, 2019.

Task 6 – Delivery of 2019 Data

Through this task, the CY2019 data can be provided after CY2019 is complete. This is expected to be completed by January 31, 2020.

Task 7 – Delivery of 2020 Data

Through this task, the CY2020 data can be provided after CY2020 is complete. This is expected to be completed by January 31, 2021.

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE STATE OF HAWAII DEPARTMENT OF HUMAN SERVICES

Agreement No. [2064-FY18-NFE-0162]

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the State of Hawaii Department of Human Services for the acquisition of Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF) data.

2. AUTHORITY

The authority for the Census Bureau to enter into this Agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the State of Hawaii Department of Human Services to share SNAP data and enter into this Agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026. The Food and Nutrition Act of 2008 limits the use of SNAP recipient information to those directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on October 24, 2017 has determined that the Census Bureau is directly connected with the administration of the SNAP program because Census will provide to the state copies of its research tabulations for the state to use in administering its SNAP program.

The authority for the State of Hawaii Department of Human Services to share TANF data and enter into this Agreement is consistent with Section 1137 of the Social Security Act and Section 205.50 of Title 45, Code of Federal Regulations.

Additional authority for the Hawaii Department of Human Services to enter into this Agreement is 42 U.S.C. 1320b-7 and the routine use exception to the Privacy Act, 5 U.S.C. 552a(b)(3).

3. TERMS AND CONDITIONS

Pursuant to this Agreement, the State of Hawaii Department of Human Services, hereinafter referred to as "the state program agency" shall transfer records to the Census Bureau from the administration of SNAP and TANF, hereinafter referred to as "the state data" and as described in Attachment A of this Agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and those Special

Sworn Status (SSS) researchers participating in the projects will have access to the data. Access shall be limited to the minimum number of individuals necessary. Any data, records, or other information shared through this research Agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it may not be disclosed in individually-identifiable form that permits the identification of any individual respondents, businesses, organizations, or institutions, and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. To the extent provided by law, the Census Bureau will recognize the state program agency as the owner of the original data in the form that it is delivered to the Census Bureau, prior to its integration with confidential Census data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

- i. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of SNAP for the years 2021-2023 and the administration of TANF for the years 2013—2023, as described in Attachment A.
- ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this Agreement; including definitions of active participants, a record layout, record count, record length and data dictionary.
- iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers may not contain any state data or direct identifiers.
- iv. To allow the Census Bureau staff and SSS researchers to use the state data at the Processing Sites listed in Section 4 of this Agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this Agreement.

b. The Census Bureau agrees:

- i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this Agreement and only for the projects listed in Attachment B or those approved in writing by both parties.
- ii. To provide the state program agency with a copy of data tabulations that the Census Bureau will create for Census research purposes. Specifically, the Census Bureau will provide the state program agency with data tabulations based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American Community Survey (ACS). Data tabulations shall include estimated rates of program eligibility and access/participation for the state

overall and by various demographic, economic, and household characteristics and by county when the data allow. It also will include distributions across the same characteristics both for program participants and for those who are estimated to be eligible but do not participate. The data tabulations will be delivered either within six (6) months from the date that the state administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.

- iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to SNAP and TANF and resulting from use under this Agreement of the state data. If no comments are received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this Agreement.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this Agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the Agreement to prevent unauthorized use. The parties mutually agree that the following locations are designated for data processing, analysis, and storage within the Census Network:

Sites: Bowie Computer Center
 Suitland Federal Center
 Federal Statistical Research Data Centers
 Census Approved Cloud Services

The parties mutually agree that the following named individuals will be designated as points of contact for the Agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency SNAP POC:

Pamela Higa
SNAP Administrator
Benefits, Employment and Support Services Division
1010 Richards Street, Suite 512
Honolulu HI 96813
(808) 586-5722
PHiga@dhs.hawaii.gov

State program agency TANF POC:

Paul Higa
Financial Assistance Program Administrator
Benefits, Employment and Support Services Division
1010 Richards Street, Suite 512
Honolulu HI 96813
(808) 586-5722
PHiga3@dhs.hawaii.gov

Census Bureau POC:

Michael Berning
Assistant Division Chief
Data Acquisition and Curation
Economic Reimbursable Surveys Division
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-2028
michael.a.berning@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This Agreement is effective on the date on which it is signed by both parties. The Agreement shall terminate six (6) years following the date on which it becomes effective. If, at the end of six (6) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this Agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the Agreement, in order to determine whether it should be revised, renewed or canceled. The review will be conducted by the Census Bureau's Assistant Director for Economic Programs and the state program agency.

Notwithstanding all other provisions of this Agreement, the Parties agree that:

- a. This Agreement may be amended at any time by written mutual consent of both parties.
- b. Either party may terminate this Agreement upon thirty (30) days written notice to the other party.

To the extent permitted by federal law, the original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3, Terms and Conditions. Any revisions to the data retention timetable after the execution of this Agreement will be stated in writing in an amendment to this Agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this Agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this Agreement.

To promote organizational transparency, and in support of data discovery for current and future research projects, the U.S. Census Bureau posts non-sensitive data documentation to public-facing websites. This documentation, such as a record layout or data dictionary, can include file descriptions, variable lists, variable labels and valid values for each variable.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this Agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5 U.S.C. App. 3, a review of this Agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this Agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

The Census Bureau will promptly consider and adjudicate, in accordance with Federal law, claims which may arise for damages of any nature arising out of a Census Bureau act under this Agreement. Such adjudication will be pursued under the Federal Tort Claims Act, 28 U.S.C. Section 2671 et seq., the Federal Employees Compensation Act, 5 U.S.C. Section 8101 et seq., or such other legal authority as may be pertinent. The U.S. Department of Justice shall determine the appropriate venues for any litigation arising under this Agreement.

7. CONFIDENTIALITY

A. IT Security

Hawaii Revised Statutes §346-10 protect the confidentiality of the state data, as well as:

- Medicaid, 42 U.S.C. § 1396(a)(a)(7), 42 CFR Part 431.300-307;
- Temporary Assistance to Needy Families, 42 U.S.C. § 602 (a)(1)(A)(iv);
- Supplemental Nutrition Assistance Program, 7 U.S.C. § 2020 (e)(8);
- 7 CFR Part 272.1(c);
- Social Security Act, 42 U.S.C. § 1396(a)(a)(7);
- Social Security Administration Disclosure, 20 CFR Part 401;
- Child Support, 42 U.S.C. § 654(26);

- Public Assistance Programs (Public Welfare), 45 CFR Part 205.50; and
- U.S. Department of Labor Employment and Training Administration, 20 CFR Part 603.

The Census Bureau will comply with all federal laws applicable to the privacy or security of data received pursuant to this Agreement. As a federal agency, the Census Bureau is not subject to state laws, however the Census Bureau will comply with the requirements of applicable state laws to the extent that they do not conflict with the Census Bureau's requirements under federal law.

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, United States Code. The data provided under this Agreement are confidential under 13, U.S.C. § 9. Per the Federal Cybersecurity Enhancement Act of 2015, these data are also protected from cybersecurity risks through screening of the systems that transmit the data. Upon receipt, all data acquired as a result of this Agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO (Chief Information Officer), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*." Security controls and subsequent assessments are to be completed based on the final categorization.

Cloud providers must be approved for at least moderate level information through the GSA FedRAMP process prior to acquiring any services. Census Bureau identifies, assesses and authorizes use based on the published FedRAMP results and an assessment of any Census Bureau (customer provided) controls implemented to protect the infrastructure and data. Security reporting on cloud providers is reported to the Department of Commerce on a regular basis under FISMA.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum M-17-12. Known or suspected losses of protected data are to be reported within one (1) hour of its discovery to the Bureau of the Census Computer Incident Response Team (BOC CIRT) who will report as required to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau becomes aware of a known breach of the State Data, the Census Bureau will contact the state program agency contacts to discuss the actions and potential remedies regarding the incident.

B. Disclosure Avoidance Review of Statistical Products

Title 13, Section 9 of the United States Code (U.S.C.) requires the Census Bureau to keep confidential the information collected from the public under the authority of Title 13. Section 214 of Title 13, U.S.C., and Sections 3551, 3559 and 3571 of Title 18, U.S.C., provide for the imposition of penalties of up to five years in prison and/or up to \$250,000.00 in fines for wrongful disclosure of confidential census information.

Disclosure avoidance is the process for protecting the confidentiality of data, as required under Title 13 U.S.C. A disclosure of data occurs when someone can use published statistical information to identify an individual who has provided confidential information under a pledge of confidentiality. For data tabulations, the Census Bureau uses disclosure avoidance procedures to modify or remove the characteristics that put confidential information at risk for disclosure. Although a published table may appear to show information about a specific individual, the Census Bureau has taken steps to disguise or suppress the original data, while making sure the results are still useful. The techniques used by the Census Bureau to protect confidentiality in tabulations vary, depending on the type of data.

Noise infusion is the Census Bureau's preferred disclosure avoidance technique. By policy, noise infusion is applied to all data products that are reported with geographies smaller than a state. Noise infusion may be required for microdata releases, depending on the characteristics of the microdata and the specific variables that are to be released. Data that cannot be publicly released may still be analyzed within the Federal Statistical Research Data Centers (FSRDCs) by individuals who have Special Sworn Status; the results of such analyses must still go through a disclosure avoidance process prior to being publicly released.

The parties understand that Title 13 confidentiality protection and disclosure avoidance techniques apply to all work described in this Agreement. The disclosure avoidance disclosure methods are defined by the Census Bureau which has the responsibility of carrying out that work. Accordingly, upon completion of the tabulation, the data produced must be reviewed by the Census Bureau to ensure that no identifiable Title 13 data are or may be disclosed. Should the Census Bureau's Disclosure Review Board (DRB) determine that the requested statistical product does or reasonably could result in such disclosure, then the data product will be modified prior to approval for release to the party(ies) to this Agreement. The DRB must approve before a research product can be released to an individual who does not have SSS and a need to know, or moved to a computer not approved for controlled data according to Census' existing policies and procedures.

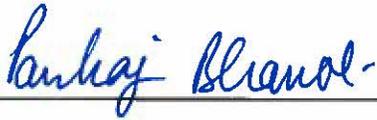
8. APPROVALS



11/19/18

Kevin Deardorff
Chief, Economic Reimbursable Surveys Division
U.S. Census Bureau

(Date)



12/27/18

Pankaj Bhanot
Director
Department of Human Services

(Date)

Attachment A: Data Elements

1. Data Requirements - SNAP

Monthly data from the Hawaii Department of Human Services administration of SNAP for the years 2021—2023 will include, when available:

- a. Case unit identifiers,
- b. Active Participant definitions,
- c. Complete monthly case unit address history (residence, mailing),
- d. Monthly Benefits data (any of the available: benefits received date, benefits amount issued/received, and benefit amount redeemed),
- e. Income reporting requirement (simplified reporting, change reporting, etc.),
- f. Gross income (monthly),
- g. Net income (monthly),
- h. Eligibility and denial information,
- i. Identifiers for individuals in case units, and
- j. The following information on individuals in a case unit:
 - i. Name
 - ii. Social Security Number
 - iii. Case unit/main contact phone number
 - iv. Relationship to primary recipient
 - v. Race
 - vi. Hispanic origin/Ethnicity
 - vii. Sex
 - viii. Date of birth
 - ix. Gross income (monthly)
 - x. Net Income (monthly)
 - xi. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)
 - xii. Education
 - xiii. Employment

2. Data Requirements - TANF

Monthly data from the Hawaii Department of Human Services administration of TANF for the years 2013—2023 will include, when available:

- a. Case unit identifiers,
- b. Active Participant definitions,
- c. Complete monthly case unit address history (residence, mailing),
- d. Monthly Benefits data (any of the available: benefits received date, benefits amount issued/received, and benefit amount redeemed),
- e. Income reporting requirement (simplified reporting, change reporting, etc.),
- f. Gross income (monthly),
- g. Net income (monthly),
- h. Eligibility and denial information,
- i. Identifiers for individuals in case units, and
- j. The following information on individuals in a case unit:
 - i. Name
 - ii. Social Security Number
 - iii. Case unit/main contact phone number
 - iv. Relationship to primary recipient
 - v. Race
 - vi. Hispanic origin/Ethnicity

- vii. Sex
- viii. Date of birth
- ix. Gross income (monthly)
- x. Net Income (monthly)
- xi. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)
- xii. Education
- xiii. Employment

Attachment B: Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records

The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of state programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing likely eligible non-participants of SNAP

Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to

each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

- A. validating and enhancing the Master Address File (MAF);¹
- B. designing and assigning resources to carry out the 2020 Census;²
- C. unduplicating public, private, and census lists; and
- D. imputing missing data.³

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American

1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.

2 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.

3 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM ADMINISTRATIVE DATA
FROM
THE STATE OF HAWAII DEPARTMENT OF HUMAN SERVICES

Agreement No. 0094-2015-NFE-006

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the State of Hawaii Department of Human Services for the acquisition of Supplemental Nutrition Assistance Program (SNAP) Administrative Data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the State of Hawaii Department of Human Services to share SNAP data and enter into this agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026. The Food and Nutrition Act of 2008 limits the use of SNAP recipient information to those directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the SNAP program because Census will provide to the state copies of its tabulations of the data for the state to use in administering its SNAP program.

Additional authority for the Hawaii Department of Human Services to enter into this agreement is 42 U.S.C. 1320b-7 and the routine use exception to the Privacy Act, 5 U.S.C. 552a(b)(3).

3. TERMS AND CONDITIONS

Pursuant to this agreement, the State of Hawaii Department of Human Services, hereinafter referred to as "the state program agency", will transfer records to the Census Bureau from the administration of SNAP, hereinafter referred to as "the state data" and as described in Attachment A of this agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. Maintaining confidentiality of these data is guaranteed under Title 13 U.S.C, Section 9, and the Privacy Act of 1974. Only Census Bureau staff and Special Sworn Status (SSS) researchers will have access to the data. Any data, records, or other information shared through this research agreement will be protected from unauthorized disclosure and will

be used solely for statistical purposes. When the Census Bureau publicly releases information related to this research, it will not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

- i. To transfer to the Census Bureau via secure FTP (File Transfer Protocol) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of SNAP for the years 2013–2020, as described in Attachment A.
- ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, record length and data dictionary.
- iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers will not contain any state data or direct identifiers.

Research projects exploring whether the administrative records represent the same individuals in survey or census households may need access to name data. Access to name data will only be granted through approval by the Census Bureau Data Stewardship Executive Policy Committee. Researchers will not have access to Social Security Numbers.

- iv. To allow the Census Bureau staff and Special Sworn Status (SSS) researchers to use the state data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

- i. To grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.
- ii. To provide the state program agency, within six (6) months of the time the data is processed and provided to Census Bureau research staff, selected tabulations of the state data linked to the American Community Survey. These tabulations will describe the demographic and household characteristics of residents who are likely to be eligible for SNAP, but who do not participate in the program.

- iii. To the extent permitted by law allow the state program agency the opportunity to review and provide comments, clearance, or rejection of pre-publication copies of any report or other document containing information derived from the state data pertaining to SNAP and resulting from use under this agreement of the state data. If no response is received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no response is received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have approved the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this agreement.

4. CONTACTS

The parties mutually agree that the following named individual is to be designated as custodian of the files on behalf of the Census Bureau and will be personally responsible for the observance of all conditions of use, and for the establishment and maintenance of security arrangements to prevent unauthorized use, as specified in the agreement. The Census Bureau agrees to notify the state program agency within fifteen (15) days of any changes of custodianship.

Custodian: J. Trent Alexander
Data Custodian
U.S. Census Bureau
4600 Silver Hill Road, 2K133
Washington DC 20233
(301) 763-9810
j.trent.alexander@census.gov

Processing Sites: Bowie Computer Center
Suitland Federal Center
Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency POC:
Pamela Higa
SNAP Administrator
Benefits, Employment and Support Services Division
820 Mililani Street, Suite 606
Honolulu HI 96813
808-586-5722
PHiga@dhs.hawaii.gov

Census Bureau POC: Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement will terminate five (5) years following the date on which it becomes effective. If, at the end of five (5) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties will review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, in order to determine whether it should be revised, renewed or canceled. The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Notwithstanding all other provisions of this agreement, the Parties agree that:

- a. This agreement may be amended at any time by written mutual consent of both parties.
- b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

The original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3. Terms and Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

7. CONFIDENTIALITY

Hawaii Revised Statutes §346-10 protect the confidentiality of the state data. The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r3 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO (Chief Information Officer), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*." Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau

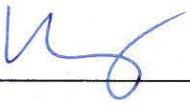
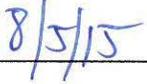
becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

8. APPROVALS

 _____ 

Ron Jarmin
Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

(Date)

 _____ 

Rachael Wong, DrPH
Director
State of Hawaii Department of Human Services

(Date)

Attachment A: Data Elements

1. Data Requirements

Data from the Hawaii Department of Human Services administration of SNAP for the years 2013—2020 will include, when available:

- a. Case unit identifiers,
- b. Complete monthly case unit address history (residence, mailing),
- c. History of benefit amounts received (monthly),
- d. Income reporting requirement (simplified reporting, change reporting, etc.),
- e. Gross income (monthly),
- f. Net income (monthly),
- g. Eligibility and denial information,
- h. Identifiers for individuals in case units, and
- i. The following information on individuals in a case unit:
 - i. Name
 - ii. Social Security Number
 - iii. Relationship to primary recipient
 - iv. Race
 - v. Sex
 - vi. Date of birth
 - vii. Education
 - viii. Employment
 - ix. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)

Attachment B: Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records

The U.S. Census Bureau administers multiple household surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of state programs in the American Community Survey (ACS), the Current Population Survey (CPS) and the Survey of Income and Program Participation (SIPP). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing likely eligible non-participants of SNAP

Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System (PVS) uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records. However, coverage for

some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research and Planning for the 2020 Census

The Census Bureau intends to test and potentially use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau intends to use state program information, along with data from federal, state, and private sources to pursue the following four research initiatives, leading to improvements in quality and efficiency of 2020 Census operations:

- A. validating and enhancing the Master Address File (MAF);¹
- B. designing and assigning resources to carry out the 2020 Census;²
- C. unduplicating public, private, and census lists; and
- D. imputing missing data.³

Data quality will be explored using 2010 decennial census data to assess the quality and utility of household roster, location, and demographic characteristics data.

Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information.

Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census to assess accuracy based on the level of aggregation.

1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.

2 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.

3 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

Memorandum of Agreement



ALASKA
**PERMANENT
FUND DIVIDEND**

pfd.alaska.gov

Alaska Department of Revenue
Permanent Fund Dividend Division
PO Box 110462
Juneau, Alaska 99811-0462

Terms and Responsibilities

The PFDD agrees to provide the agency with the URL, login and password to access the data via the web upon the agency's compliance with the requirements of this agreement. The PFDD does not guarantee the availability or accuracy of information obtained by the agency from the PFDD's computer data files. The agency agrees to use information obtained through this agreement only for the purposes described in AS 43.23.017. The agency agrees to ensure that each subordinate employee given access to the PFD Government Extract data will be required to sign a CONFIDENTIALITY AGREEMENT REGARDING PERMANENT FUND DIVIDEND APPLICANT INFORMATION which includes all of the requirements provided in 15 AAC 23.253 (h). The agency agrees not to release, or allow its subordinate employees to release, information obtained through this agreement other than as provided herein.

Data Security and Confidentiality

The agency understands that PFD applicant data is confidential as prescribed by AS 43.23.017 and art. I, § 22, Constitution of Alaska. The agency hereby declares that safeguards are in place to prevent unauthorized access to PFD applicant data. The agency also hereby declares that access to the PFDD's computer data files will be limited to only those PFD applicant records necessary for the uses and purposes as stated in the business intent, as it meets AS 43.23.017.

Should the agency employ the services of a contractor who will have access to PFD applicant data, the agency will submit a statement to the PFDD, signed by the agency and the contractor affirming that the contractor and any subordinate employees having access to the information understand that the information is confidential and have a signed CONFIDENTIALITY AGREEMENT REGARDING PERMANENT FUND DIVIDEND APPLICANT INFORMATION which includes all of the requirements provided in 15 AAC 23.253(h). The agency understands the applicable provisions of AS 11.56.860 and 5 U.S.C. 552a (Privacy Act of 1974) regarding misuse of confidential information.

Prior Agreements Superseded and Effective Date

This agreement supersedes and makes null and void all previous agreements made between the PFDD and the agency with respect to access of the PFDD's computer data files. This agreement is effective on the date of signature below and will remain in effect as long as the agency's uses and purposes are consistent with those as stated in section three (3) above and the agency annually provides a certification agreeing to remain bound by all of the terms contained in this agreement. This agreement may be renegotiated to incorporate change upon notification in writing by both parties and approval by all signatories. This agreement may be rescinded at any time by either party upon notification in writing by the party rescinding the agreement that they no longer wish to be bound by the terms of this agreement.

I certify that I am authorized to sign this document.

Your Signature:

Date:

Adam Galemore

12/21/2017

This signature is not valid until you sign with myAlaska.

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
WOMEN, INFANTS, AND CHILDREN ADMINISTRATIVE DATA
FROM
THE IDAHO DEPARTMENT OF HEALTH AND WELFARE

Agreement No. 0094-FY17-NFE-0089

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Idaho Department of Health and Welfare for the acquisition of Women, Infants, and Children (WIC) Administrative Data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the Idaho Department of Health and Welfare to share WIC data and enter into this agreement is Section 17 of the Child Nutrition Act of 1966, 42 U.S.C. § 1786 and implementing regulations at 7 CFR Part 246. WIC regulations at 7 CFR 246.26(d)(1)(ii) limit the disclosure of WIC recipient information to those directly connected with the administration or enforcement of the WIC program. The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the WIC program because Census will provide to the state copies of its tabulations of the data for the state to use in administering its WIC program.

3. TERMS AND CONDITIONS

Pursuant to this agreement, the Idaho Department of Health and Welfare, hereinafter referred to as "the state program agency", will transfer records to the Census Bureau from the administration of WIC, hereinafter referred to as "the state data" and as described in Attachment A of this agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and Special Sworn Status ("SSS") researchers will have access to the data. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it will not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses.

The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

- i. To transfer to the Census Bureau via secure FTP (File Transfer Protocol) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of WIC for the years 2012–2021, as described in Attachment A.
- ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, and record length.
- iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers will not contain any state data or direct identifiers.
- iv. To allow the Census Bureau staff and Special Sworn Status (SSS) researchers to use the state data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

- i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.
- ii. To provide the state program agency a table package based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American Community Survey (ACS). A table package shall include estimated rates of program eligibility and access/participation for the state overall and by various demographic, economic, and household characteristics and by county when the data allow. It also will include distributions across the same characteristics both for program participants and for those who are estimated to be eligible but do not participate. The table package will be delivered either within six (6) months from the date that the state administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.
- iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to WIC and resulting from use under this agreement of the state data. If no comments are received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comment

regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this agreement.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the agreement to prevent unauthorized use.

Processing Sites: Bowie Computer Center
 Suitland Federal Center
 Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency POC:

Cristi Litzsinger
Idaho WIC Program Manager
Division of Public Health
Department of Health and Welfare
450 West State Street
Boise, ID 83720-0036
(208) 334-5951
cristi.litzsinger@dhw.idaho.gov

Census Bureau POC:

Dr. Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement will terminate six (6) years following the date on which it becomes effective. If, at the end of six (6) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties will review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, in order to determine whether it should be revised, renewed or

canceled. The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Notwithstanding all other provisions of this agreement, the Parties agree that:

- a. This agreement may be amended at any time by written mutual consent of both parties.
- b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

The original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3. Terms and Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

7. CONFIDENTIALITY

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO (Chief Information Officer), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*." Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

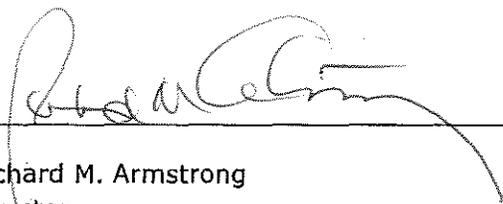
8. APPROVALS



12/12/16

Michael Thieme
Acting Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

(Date)



1/6/17

Richard M. Armstrong
Director
Idaho Department of Health and Welfare

(Date)

Attachment A: Data Elements

1. Data Requirements

Monthly data from the administration of WIC for the years 2012–2021 will include, when available:

- a. Case unit identifiers,
- b. Complete monthly case unit address history (residence, mailing),
- c. Benefit amounts received (monthly) or benefits received date (monthly),
- d. Income reporting requirement (simplified reporting, change reporting, etc.),
- e. Gross income (monthly),
- f. Net income (monthly),
- g. Eligibility and denial information,
- h. Identifiers for individuals in case units, and
- i. The following information on individuals in a case unit:
 - i. Name
 - ii. Case unit/main contact phone number
 - iii. Relationship to primary recipient
 - iv. Recipient or Caretaker phone number
 - v. Race
 - vi. Hispanic origin/Ethnicity
 - vii. Sex
 - viii. Date of birth

Attachment B: Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records

The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of state programs in the American Community Survey (ACS), the Current Population Survey (CPS) and the Survey of Income and Program Participation (SIPP). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing WIC participants and likely eligible non-participants of WIC

WIC data linked to ACS data can provide characteristic information for women, infants, and children participating in the WIC program. Additionally, infants and children with a high probability of being eligible for WIC can be estimated using ACS information on family structure, reported income, and public assistance.¹ The estimated eligible infants and children can be matched to the administrative WIC data to determine who is estimated to be eligible but not participating in the program, helping agencies determine unmet need. The project results can help state agencies improve outreach efforts. This research helps the Census Bureau better understand their survey and census data.

3. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System (PVS) uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would

¹ Eligible pregnant and breastfeeding women cannot be identified in ACS data.

have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

- A. validating and enhancing the Master Address File (MAF);²
- B. designing and assigning resources to carry out the 2020 Census;³
- C. unduplicating public, private, and census lists; and
- D. imputing missing data.⁴

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of

² Examples of possible Census Bureau uses include updating and evaluating the Master Address File.

³ Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.

⁴ Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

MODIFICATION TO THE
MEMORANDUM OF UNDERSTANDING BETWEEN THE
U.S. CENSUS BUREAU AND
THE LOS ANGELES HOMELESS SERVICES AUTHORITY
Modification # 0094-FY16-NFE-0045-001

This document amends the June 7, 2016 agreement #0094-FY16-NFE-0045 between the U.S. Census Bureau and the Los Angeles Homeless Services Authority (LAHSA) under which LAHSA agrees to transfer to the Census Bureau confidential data. The purpose of the amendment is to:

1. Add two additional projects to Attachment B: Description of Approved Research Projects:

6. Evaluating the Impact of Veterans Justice Programs on Homelessness, Incarceration, and Healthcare

The Veterans Justice Programs (VJP) is a key component of the Department of Veterans Affairs' commitment to ending Veteran homelessness. The VJP partners with local criminal justice agencies to identify Veterans who would benefit from treatment as an alternative to incarceration, and links them to VA and community-based services to prevent homelessness, end Veterans' cyclical contact with the criminal justice system, improve social and clinical outcomes, and facilitate recovery. The Healthcare for Reentry Veterans (HCRV) program, one of two VJP programs and the focus of this study, provides pre-release outreach, assessment, service linkage, and post-release case management services for Veterans released from state and federal prisons to promote successful community integration.

This will be the first comparative effectiveness study of HCRV, assessing homelessness, incarceration, and healthcare utilization of its clients compared to control groups that did not receive VJP services. Bureau of Justice Statistics (BJS) state prison data for Texas, California, and New York will be matched with VJP records to identify control groups of (1) veterans with current or recent involvement in the criminal justice system that have not accessed HCRV and (2) criminal-justice involved non-veterans. To evaluate program outcomes, these data will then be matched with shelter and local jail data in New York City, Houston and Harris County, Texas, and Los Angeles, CA to assess homeless service and local criminal justice system involvement as well as earnings and employment data from the Census Bureau, education data from the National Student Clearinghouse, and state prison reentry data from the BJS.

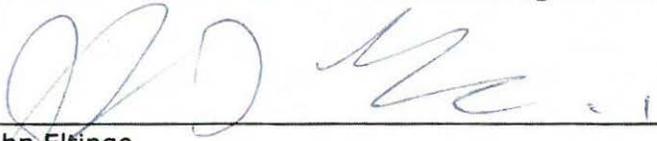
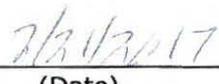
7. Tracking Service Usage and Geographic Mobility following Shelter Exit

There is little research describing the circumstances under which homeless adults exit homelessness and their subsequent life trajectories. This is generally a result of provider-based data systems that track people during a spell of homelessness and may capture information about precipitating factors, but do not track people beyond program exit or across localities. Studies on migration among homeless persons are particularly rare for this reason. One 1996 nationwide study found that 41 percent of homeless or formerly homeless single adults reported moving communities following the onset of homelessness, and 16 percent reported migrating across state lines, and less systematic findings suggest that homeless adults have stronger place-based ties than others. Beyond limiting our understanding of geographic mobility, these constraints have impeded research on the extent to which formerly homeless adults access services in other locations. Little research exists on the extent to which people homeless in one jurisdiction move and access homelessness or other services elsewhere, with the one study on migratory patterns of homeless service utilization focusing on homeless veterans.

All other terms and conditions contained in the original Census Bureau/LAHSAs agreement shall remain the same.

SIGNATURES:

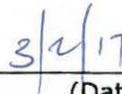
On behalf of the Census Bureau, the undersigned individual hereby attests that he or she is authorized to enter into this amendment and agrees to all the terms specified herein.

Dr. John Eltinge
Assistant Director
Research and Methodology Directorate of U.S. Census Bureau

(Date)

On behalf of LAHSA, the undersigned individual hereby attests that he or she is authorized to enter into this amendment and agrees to all the terms specified herein.

Peter Lynn
Executive Director
Los Angeles Homeless Services Authority

(Date)

Memorandum of Understanding Execution Routing Form

Contractor Name: United States Department of Commerce – Bureau of the Census

Contract Number: 0094-FY16-NFE-0045-001

CFDA: NONE

Project: HMIS Data Acquisition

Contract Amount: N/A

Contract Term: June 7, 2016 and then set to terminate six (6) years after Signature Date

This MOU is between LAHSA and the U.S. Census Bureau in which LAHSA provides data from HMIS to the U.S. Census Bureau.

Contract Execution

Fiscal Approval Required

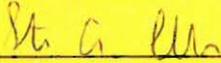
Yes

No

Comment:

This modification to the MOU adds two additional projects to the Description of Approved Research Projects for this MOU.

Completed by



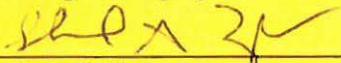
Contracts Specialist

Funder Agreement Executed

3/1/17

Date

Approved generally by

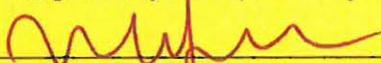


Contracts Unit Manager

3/2/17

Date

Approved, generally and specifically for Statement of Work, by



Data and Research Manager

3/2/17

Date

Approved, generally and specifically for Performance Targets, by

N/A

Outcomes and Evaluation Manager

RETURN TO CONTRACTS UNIT – SEE COMMENTS ABOVE

READY FOR EXECUTION BY CFO AND EXECUTIVE DIRECTOR

N/A

Chief Financial Officer

Date

Executive Execution by



Executive Director

3/4/17

Date



ADMINISTRATIVE OFFICE
811 Wilshire Blvd., 6th Floor
Los Angeles, CA 90017
Ph: 213.683.3333
Fx: 213.892.0093
TTY: 213.553.8488
www.lahsa.org

MEMO

To: Katherine Reeves
From: Debra Neal, Administrative Assistant /Operation Unit
Date: March 7, 2017
CC: Shalon Zeferjahn, Contract Unit Manager
Re: Contract Number 0094-FY16-NFE-0045-001

Dear Mr. Eltinge:

Enclosed is the fully executed Memorandum of Understanding between Los Angeles Homeless Services Authority and The United States Department of Commerce- Bureau of the Census- HMIS Data Acquisition.

Please keep this Contract in your records for future reference and auditing purposes.

If you have any questions regarding this matter, please contact Steve Cuellar, Contract Specialist at (213) 683.3349 or via email scuellar@lahsa.org

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
WOMEN, INFANTS, AND CHILDREN ADMINISTRATIVE DATA
FROM
THE ALABAMA DEPARTMENT OF PUBLIC HEALTH

Agreement No. 0094-FY16-NFE-0072

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Alabama Department of Public Health for the acquisition of Women, Infants, and Children (WIC) Administrative Data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the Alabama Department of Public Health to share WIC data and enter into this agreement is Section 17 of the Child Nutrition Act of 1966, 42 U.S.C. § 1786 and implementing regulations at 7 CFR Part 246. WIC regulations at 7 CFR 246.26(e) limit the disclosure of WIC recipient information to those directly connected with the administration or enforcement of the WIC program. The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the WIC program because Census will provide to the state copies of its tabulations of the data for the state to use in administering its WIC program.

Additional authority for the Alabama Department of Public Health to enter into this agreement is Section 38-2-6 of the *Code of Alabama 1975* regarding the use and confidentiality of records concerning children, children's families, and public-assistance recipients and applicants.

The Census Bureau shall protect the information provided under this agreement in accordance with 13 U.S.C. Section 9. Both parties agree to comply with HIPAA to the extent applicable under this agreement. In the unlikely even protected health information (PHI), as that term is defined by HIPAA, is disclosed to the other party for any purpose, the receiving party will not use or disclose PHI other than as permitted or required by this Agreement and /or applicable law.

3. TERMS AND CONDITIONS

Pursuant to this agreement, the Alabama Department of Public Health, hereinafter referred to as "the State program agency", will transfer records to the Census Bureau

from the administration of WIC, hereinafter referred to as "the State data" and as described in Attachment A of this agreement. All data that the State program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of these data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act of 1974. To the extent provided by law, only Census Bureau staff and Special Sworn Status (SSS) researchers will have access to the data. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and will be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it will not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the State data to census data, survey data and administrative records data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the State data to provide new and improved estimates of population characteristics related to program participation.

a. The State program agency agrees:

- i. To transfer to the Census Bureau via secure FTP (File Transfer Protocol) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of WIC for October 2014–2021, as described in Attachment A.
- ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, and record length.
- iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the State data. Record linkage identifiers will not contain any State data or direct identifiers.
- iv. To allow the Census Bureau staff and Special Sworn Status (SSS) researchers to use the State data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

- i. To the extent provided by law, to grant access to the State data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.
- ii. To provide the State program agency a table package based on at least two consecutive calendar years of State program participation administrative records linked to annual responses to the American Community Survey (ACS). A table package shall include estimated rates of program eligibility and access/participation for the State overall and by various demographic, economic, and household characteristics and by

county when the data allow. It also will include distributions across the same characteristics both for program participants and for those who are estimated to be eligible but do not participate. The table package will be delivered either within six (6) months from the date that the State administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.

- iii. To the extent permitted by law, allow the State program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the State data pertaining to WIC and resulting from use under this agreement of the State data. If no comments are received from the State program agency within fourteen (14) days from delivery of pre-publication documents to the State program agency, the Census Bureau shall send a reminder notice to the State program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the State program agency will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the State data under this agreement.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the agreement to prevent unauthorized use.

Processing Sites: Bowie Computer Center
 Suitland Federal Center
 Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the State program agency and the Census Bureau, respectively:

State program agency POC:
 Amanda Martin
 Alabama WIC Program Director
 Bureau of Family Health Services
 Alabama Department of Public Health
 201 Monroe Street, Suite 1300
 Montgomery, Alabama 36104
 (334) 206-2927
 Amanda.Martin@adph.state.al.us

Census Bureau POC: Dr. Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement will terminate six (6) years following the date on which it becomes effective. If, at the end of six (6) years, the parties wish to continue the relationship, they must execute a new agreement.

This Memorandum of Understanding may be canceled at any time by either party providing a thirty (30) day written notice to the other party.

The parties will review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, in order to determine whether it should be revised, renewed or canceled. The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the State program agency.

Notwithstanding all other provisions of this agreement, the Parties agree that:

- a. This agreement may be amended at any time by written mutual consent of both parties.
- b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

The original State data received from the State program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the State program agency establishes a different timetable as clarified, when necessary, in Section 3. Terms and Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original State data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the State data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of State records with linkage identifiers and State data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

7. CONFIDENTIALITY

Alabama Code section 38-2-6 protects the confidentiality of the State data, as well as WIC regulations at 7 CFR 246.26(e). The Census Bureau assumes an obligation to keep all data received from other federal, state, and tribal agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO (Chief Information Officer), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*." Security controls and subsequent assessments are to be completed based on the final categorization.

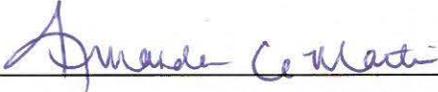
The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau

becomes aware of a known breach of the State data, the Census Bureau will contact the identified State program agency contacts to discuss the actions and potential remedies regarding the incident.

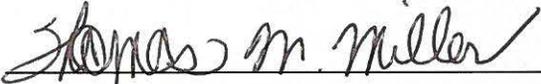
8. APPROVALS



Ron Jarmin (Date) 9/20/14
Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau



Amanda Martin (Date) 10/27/2014
Alabama WIC Program Director
Alabama Department of Public Health



Thomas M. Miller, M.D. (Date) 11/8/16
State Health Officer
Alabama Department of Public Health

APPROVED AS TO FORM AND
COMPLIANCE WITH APPLICABLE
RULES AND REGULATIONS
DEPT. OF PUBLIC HEALTH

NOV 4 2016



OFFICE OF GENERAL COUNSEL

Attachment A: Data Elements

1. Data Requirements

Data from the administration of WIC beginning October 2014 -2021 will include, when available:

- (a) Family ID
- (b) Physical Address
- (c) Reported Income
- (d) Number in Household
- (e) The following information on individuals:
 - i) Participant ID
 - ii) Name
 - iii) Race
 - iv) Ethnicity
 - v) Sex
 - vi) Date of Birth
 - vii) Adjunct Program (if applicable)

Attachment B: Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State, Federal and Tribal Administrative Records

The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the State data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of State programs in the American Community Survey (ACS), the Current Population Survey (CPS) and the Survey of Income and Program Participation (SIPP). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state, federal and tribal programs (including the State data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing WIC participants and likely eligible non-participants of WIC

WIC data linked to ACS data can provide characteristic information for women, infants, and children participating in the WIC program. Additionally, infants and children with a high probability of being eligible for WIC can be estimated using ACS information on family structure, reported income, and public assistance.¹ The estimated eligible infants and children can be matched to the administrative WIC data to determine who is estimated to be eligible but not participating in the program, helping agencies determine unmet need. The project results can help State agencies improve outreach efforts. This research helps the Census Bureau better understand their survey and census data.

3. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System (PVS) uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records. However, coverage for

¹ Eligible pregnant and breastfeeding women cannot be identified in ACS data.

some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the State program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in State programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using State program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

- A. validating and enhancing the Master Address File (MAF);²
- B. designing and assigning resources to carry out the 2020 Census;³
- C. unduplicating public, private, and census lists; and
- D. imputing missing data.⁴

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American

² Examples of possible Census Bureau uses include updating and evaluating the Master Address File.

³ Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.

⁴ Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE NEVADA DIVISION OF WELFARE AND SUPPORTIVE SERVICES

Agreement No. [2064-FY19-NFE-0267]

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Nevada Division of Welfare and Supportive Services (DWSS) for the acquisition of Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF) data.

2. AUTHORITY

The authority for the Census Bureau to enter into this Agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the Nevada DWSS to share SNAP data and enter into this Agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026. The Food and Nutrition Act of 2008 limits the use of SNAP recipient information to those directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on October 24, 2017 has determined that the Census Bureau is directly connected with the administration of the SNAP program because Census will provide to the state copies of its research tabulations for the state to use in administering its SNAP program.

The authority for the Nevada DWSS to share TANF data and enter into this Agreement is consistent with Section 1137 of the Social Security Act and Section 205.50 of Title 45, Code of Federal Regulations.

Additional authority for the Nevada DWSS to enter into this Agreement is the Nevada Statute, NRS 422A.342 regarding the custody, use, preservation and confidentiality of records, files and communications concerning applicants for and recipients of public assistances or assistance pursuant to Children's Health Insurance Program.

3. TERMS AND CONDITIONS

Pursuant to this Agreement, the Nevada DWSS, hereinafter referred to as "the state program agency" shall transfer records to the Census Bureau from the administration of SNAP and TANF, hereinafter referred to as "the state data" and as described in Attachment A of this Agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and those Special Sworn Status (SSS)

researchers participating in the projects will have access to the data. Access shall be limited to the minimum number of individuals necessary. Any data, records, or other information shared through this research Agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it may not be disclosed in individually-identifiable form that permits the identification of any individual respondents, businesses, organizations, or institutions, and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. To the extent provided by law, the Census Bureau will recognize the state program agency as the owner of the original data in the form that it is delivered to the Census Bureau, prior to its integration with confidential Census data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

- i. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of SNAP and administration of TANF for the years 2017–2023, as described in Attachment A.
- ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this Agreement; including definitions of active participants, a record layout, record count, record length and data dictionary.
- iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers may not contain any state data or direct identifiers.
- iv. To allow the Census Bureau staff and SSS researchers to use the state data at the Processing Sites listed in Section 4 of this Agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this Agreement.

b. The Census Bureau agrees:

- i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this Agreement and only for the projects listed in Attachment B or those approved in writing by both parties.
- ii. To provide the state program agency with a copy of data tabulations that the Census Bureau will create for Census research purposes. Specifically, the Census Bureau will provide the state program agency with data tabulations based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American Community Survey (ACS). Data tabulations shall include estimated rates of program eligibility and access/participation for the state

overall and by various demographic, economic, and household characteristics and by county when the data allow. It also will include distributions across the same characteristics both for program participants and for those who are estimated to be eligible but do not participate. The data tabulations will be delivered either within six (6) months from the date that the state administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.

- iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to SNAP and TANF and resulting from use under this Agreement of the state data. If no comments are received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this Agreement.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this Agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the Agreement to prevent unauthorized use. The parties mutually agree that the following locations are designated for data processing, analysis, and storage within the Census Network:

Sites: Bowie Computer Center or Other Approved Census Computer Centers
 Suitland Federal Center
 Federal Statistical Research Data Centers
 Census Approved Cloud Services

The parties mutually agree that the following named individuals will be designated as points of contact for the Agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency POC:

Steve H. Fisher
Administrator
Nevada Division of Welfare and Supportive Services
1470 College Parkway
(775) 684-0500
shfisher@dwss.nv.gov

Census Bureau POC: Michael Berning
Assistant Division Chief
Data Acquisition and Curation
Economic Reimbursable Surveys Division
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-2028
michael.a.berning@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This Agreement is effective on the date on which it is signed by both parties. The Agreement shall terminate five (5) years following the date on which it becomes effective. If, at the end of five (5) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this Agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the Agreement, in order to determine whether it should be revised, renewed or canceled. The review will be conducted by the Census Bureau's Assistant Director for Economic Programs and the state program agency.

Notwithstanding all other provisions of this Agreement, the Parties agree that:

- a. This Agreement may be amended at any time by written mutual consent of both parties.
- b. Either party may terminate this Agreement upon thirty (30) days written notice to the other party.

To the extent permitted by federal law, the original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3, Terms and Conditions. Any revisions to the data retention timetable after the execution of this Agreement will be stated in writing in an amendment to this Agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this Agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this Agreement.

To promote organizational transparency, and in support of data discovery for current and future research projects, the U.S. Census Bureau posts non-sensitive data documentation to public-facing websites. This documentation, such as a record layout or data dictionary, can include file descriptions, variable lists, variable labels and valid values for each variable.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this Agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5 U.S.C. App. 3, a review of this Agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this Agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

The Census Bureau will promptly consider and adjudicate, in accordance with Federal law, claims which may arise for damages of any nature arising out of a Census Bureau act under this Agreement. Such adjudication will be pursued under the Federal Tort Claims Act, 28 U.S.C. Section 2671 et seq., the Federal Employees Compensation Act, 5 U.S.C. Section 8101 et seq., or such other legal authority as may be pertinent. The U.S. Department of Justice shall determine the appropriate venues for any litigation arising under this Agreement.

7. CONFIDENTIALITY

A. IT Security

Nevada Statute, NRS 422A.342 protects the confidentiality of the state data, as well as:

- Medicaid, 42 U.S.C. § 1396(a)(a)(7), 42 CFR Part 431.300-307;
- Temporary Assistance to Needy Families, 42 U.S.C. § 602 (a)(1)(A)(iv);
- Supplemental Nutrition Assistance Program, 7 U.S.C. § 2020 (e)(8);
- 7 CFR Part 272.1(c);
- Social Security Act, 42 U.S.C. § 1396(a)(a)(7);
- Social Security Administration Disclosure, 20 CFR Part 401;
- Child Support, 42 U.S.C. § 654(26);
- Public Assistance Programs (Public Welfare), 45 CFR Part 205.50; and
- U.S. Department of Labor Employment and Training Administration, 20 CFR Part 603.

The Census Bureau will comply with all federal laws applicable to the privacy or security of data received pursuant to this Agreement. As a federal agency, the

Census Bureau is not subject to state laws, however the Census Bureau will comply with the requirements of applicable state laws to the extent that they do not conflict with the Census Bureau's requirements under federal law.

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, United States Code. The data provided under this Agreement are confidential under 13, U.S.C. § 9. Per the Federal Cybersecurity Enhancement Act of 2015, these data are also protected from cybersecurity risks through screening of the systems that transmit the data. Upon receipt, all data acquired as a result of this Agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO (Chief Information Officer), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*." Security controls and subsequent assessments are to be completed based on the final categorization.

Cloud providers must be approved for at least moderate level information through the GSA FedRAMP process prior to acquiring any services. Census Bureau identifies, assesses and authorizes use based on the published FedRAMP results and an assessment of any Census Bureau (customer provided) controls implemented to protect the infrastructure and data. Security reporting on cloud providers is reported to the Department of Commerce on a regular basis under FISMA.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum M-17-12. Known or suspected losses of protected data are to be reported within one (1) hour of its discovery to the Bureau of the Census Computer Incident Response Team (BOC CIRT) who will report as required to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau becomes aware of a known breach of the State Data, the Census Bureau will contact the state program agency contacts to discuss the actions and potential remedies regarding the incident.

B. Disclosure Avoidance Review of Statistical Products

Title 13, Section 9 of the United States Code (U.S.C.) requires the Census Bureau to keep confidential the information collected from the public under the authority of Title 13. Section 214 of Title 13, U.S.C., and Sections 3551,

3559 and 3571 of Title 18, U.S.C., provide for the imposition of penalties of up to five years in prison and/or up to \$250,000.00 in fines for wrongful disclosure of confidential census information.

Disclosure avoidance is the process for protecting the confidentiality of data, as required under Title 13 U.S.C. A disclosure of data occurs when someone can use published statistical information to identify an individual who has provided confidential information under a pledge of confidentiality. For data tabulations, the Census Bureau uses disclosure avoidance procedures to modify or remove the characteristics that put confidential information at risk for disclosure. Although a published table may appear to show information about a specific individual, the Census Bureau has taken steps to disguise or suppress the original data, while making sure the results are still useful. The techniques used by the Census Bureau to protect confidentiality in tabulations vary, depending on the type of data.

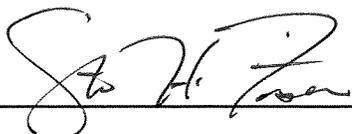
Noise injection is the Census Bureau's preferred disclosure avoidance technique. By policy, noise injection is applied to all data products that are reported with geographies smaller than a state. In cases when it is not feasible to fully implement noise injection within the period of the contract, a transition plan for implementing noise injection or other provable privacy methods must be developed in coordination with the Census Bureau. Noise injection may be required for microdata releases, depending on the characteristics of the microdata and the specific variables that are to be released. Data that cannot be publicly released may still be analyzed within the Federal Statistical Research Data Centers (FSRDCs) by individuals who have Special Sworn Status; the results of such analyses must still go through a disclosure avoidance process prior to being publicly released.

The parties understand that Title 13 confidentiality protection and disclosure avoidance techniques apply to all work described in this Agreement. The disclosure avoidance disclosure methods are defined by the Census Bureau which has the responsibility of carrying out that work. Accordingly, upon completion of the tabulation, the data produced must be reviewed by the Census Bureau to ensure that no identifiable Title 13 data are or may be disclosed. Should the Census Bureau's Disclosure Review Board (DRB) determine that the requested statistical product does or reasonably could result in such disclosure, then the data product will be modified prior to approval for release to the party(ies) to this Agreement. The DRB must approve before a research product can be released to an individual who does not have SSS and a need to know, or moved to a computer not approved for controlled data according to Census' existing policies and procedures.

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8. APPROVALS

FOR:  7/30/19
Kevin Deardorff (Date)
Chief, Economic Reimbursable Surveys Division
U.S. Census Bureau

 8/13/19
Steve H. Fisher (Date)
Administrator
Nevada Division of Welfare and Supportive Services

Attachment A: Data Elements

1. Data Requirements

Monthly data from the administration of SNAP and TANF for the years 2017–2023 will include, when available:

- a. Case unit identifiers,
- b. Active Participant definitions,
- c. Complete monthly case unit address history (residence, mailing),
- d. Monthly Benefits data (any of the available: benefits received date, benefits amount issued/received, and benefit amount redeemed),
- e. Income reporting requirement (simplified reporting, change reporting, etc.),
- f. Gross income (monthly),
- g. Net income (monthly),
- h. Eligibility and denial information,
- i. Identifiers for individuals in case units, and
- j. The following information on individuals in a case unit:
 - i. Name
 - ii. Social Security Number
 - iii. Case unit/main contact phone number
 - iv. Relationship to primary recipient
 - v. Race
 - vi. Hispanic origin/Ethnicity
 - vii. Sex
 - viii. Date of birth
 - ix. Gross income (monthly)
 - x. Net Income (monthly)
 - xi. Monthly Income source (earnings, TANF, SSI, SSA, UI, general assistance, other)
 - xii. Education
 - xiii. Employment

Attachment B: Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records

The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of state programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing likely eligible non-participants of SNAP

Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to

each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

- A. validating and enhancing the Master Address File (MAF);¹
- B. designing and assigning resources to carry out the 2020 Census;²
- C. unduplicating public, private, and census lists; and
- D. imputing missing data.³

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American

¹ Examples of possible Census Bureau uses include updating and evaluating the Master Address File.

² Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.

³ Examples of possible Census Bureau uses include Item Imputation and count Imputation using information from a composite of public and private data sources.

population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE NORTH DAKOTA DEPARTMENT OF HUMAN SERVICES

Agreement No. 0094-FY17-NFE-0077

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Economic Assistance Division, North Dakota Department of Human Services, for the acquisition of Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF) data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the Economic Assistance Division, hereinafter referred to as "the state program agency," to share SNAP data and enter into this agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026. The Act limits the use of SNAP recipient information to those directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the SNAP program because the Census Bureau will provide to the state program agency copies of its tabulations of the data for the state program agency to use in administering its SNAP program.

The authority for the state program agency to share TANF data and enter into this agreement is the Public Health and Welfare Act, 42 U.S.C. § 613.

Pursuant to this agreement, the state program agency shall transfer records to the Census Bureau from the administration of SNAP and TANF, hereinafter referred to as "the state data" and as described in Attachment A of this agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and Special Sworn Status ("SSS") researchers will have access to the data. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it may not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines.

The Census Bureau will link the state data to census data, survey data and administrative records data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

- i. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of SNAP and administration of TANF for the years 2004—2021, as described in Attachment A.
- ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, record length and data dictionary.
- iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers may not contain any state data or direct identifiers.
- iv. To allow the Census Bureau staff and SSS researchers to use the state data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

- i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.
- ii. To provide the state program agency a table package based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American Community Survey (ACS). A table package shall include estimated rates of program eligibility and access/participation for the state overall and by various demographic, economic, and household characteristics and by county when the data allow. It also will include distributions across the same characteristics both for program participants and for those who are estimated to be eligible but do not participate. The table package will be delivered either within six (6) months from the date that the state administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.
- iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to SNAP and TANF and resulting from use under this agreement of the state data. If no comments are received from the state

program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this agreement.

3. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the agreement to prevent unauthorized use.

Processing Sites: Bowie Computer Center
 Suitland Federal Center
 Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency POC:

Carol Cartledge
Director of Economic Assistance Division
North Dakota Department of Human Services
600 E Boulevard Ave, Judicial Wing, 3rd Floor
Bismarck, ND 58505
(701) 328-4008
ccartledge@nd.gov

Census Bureau POC:

Dr. Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

4. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement shall terminate six (6) years following the date on which it becomes effective. If, at the end of six (6) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, in order to determine whether it should be revised, renewed or canceled. The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Notwithstanding all other provisions of this agreement, the Parties agree that:

- a. This agreement may be amended at any time by written mutual consent of both parties.
- b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

The original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3. Terms and Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

5. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in

order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

6. CONFIDENTIALITY

N.D.C.C. 44-04-18.19 and N.D.C.C. 50-06-15 protect the confidentiality of the state data, as well as:

- Medicaid, 42 U.S.C. § 1396(a)(a)(7), 42 CFR Part 431.300-307;
- Temporary Assistance to Needy Families, 42 U.S.C. § 602 (a)(1)(A)(iv);
- Supplemental Nutrition Assistance Program, 7 U.S.C. § 2020 (e)(8);
- 7 CFR Part 272.1(c);
- Social Security Act, 42 U.S.C. § 1396(a)(a)(7);
- Social Security Administration Disclosure, 20 CFR Part 401;
- Child Support, 42 U.S.C. § 654(26);
- Public Assistance Programs (Public Welfare), 45 CFR Part 205.50; and
- U.S. Department of Labor Employment and Training Administration, 20 CFR Part 603.

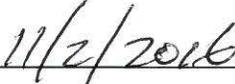
The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the Chief Information Officer ("CIO"), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

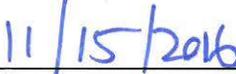
All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*." Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team ("US CERT"). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

7. APPROVALS

  _____

Michael Thieme (Date)
Acting Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

  _____

Maggie D. Anderson (Date)
Executive Director
North Dakota Department of Human Services

Attachment A: Data Elements

1. Data Requirements

Monthly data from the administration of SNAP and TANF for the years 2004—2021 will include, when available:

- a. Case unit identifiers,
- b. Complete monthly case unit address history (residence, mailing),
- c. Benefit amounts received (monthly),
- d. Income reporting requirement (simplified reporting, change reporting, etc.),
- e. Gross income (monthly),
- f. Net income (monthly),
- g. Eligibility and denial information,
- h. Identifiers for individuals in case units, and
- i. The following information on individuals in a case unit:
 - i. Name
 - ii. Social Security Number
 - iii. Case unit/main contact phone number
 - iv. Relationship to primary recipient
 - v. Race
 - vi. Hispanic origin/Ethnicity
 - vii. Sex
 - viii. Date of birth
 - ix. Education
 - x. Employment
 - xi. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)

Attachment B: Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records

The Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of state programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing likely eligible non-participants of SNAP

Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to

each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

- A. validating and enhancing the Master Address File (MAF);¹
- B. designing and assigning resources to carry out the 2020 Census;²
- C. unduplicating public, private, and census lists; and
- D. imputing missing data.³

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American

1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.

2 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.

3 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE OREGON DEPARTMENT OF HUMAN SERVICES

Agreement No. 0094-FY17-NFE-0076

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Oregon Department of Human Services for the acquisition of Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF) data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the Oregon Department of Human Services to share SNAP data and enter into this agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C. § 2026. The Food and Nutrition Act of 2008 limits the use of SNAP recipient information to those directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture Food and Nutrition Service (FNS), through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the SNAP program because Census will provide to the state copies of its tabulations of the data for the state to use in administering its SNAP program.

The authority for the Oregon Department of Human Services to share TANF data and enter into this agreement is the Public Health and Welfare Act, 42 U.S.C. § 613. Additional authority for the Oregon Department of Human Services to enter into this agreement is Oregon Revised Statute 411.116.

Additionally, under Oregon Revised Statute 411.320, as relevant to this agreement, the Oregon Department of Human Services may only use and disclose public assistance records, such as SNAP records, for purposes directly connected with the administration of the public assistance programs; or as necessary to assist public assistance applicants and recipients in accessing and receiving other governmental or private nonprofit services.

Disclosing data to the Census Bureau and receiving information from the Census Bureau will allow the Oregon Department of Human Services to identify specific geographical areas and populations that underutilize the SNAP program and to do outreach to these underserved groups. One of the goals of SNAP is to reach all families and individuals that may be eligible for benefits and break through barriers to those not currently receiving benefits but may be potentially eligible. Per the USDA Economic Research Service, in 2012, Oregon experienced a 13.6% food insecurity rate, meaning 13.6% of

Oregonians experienced hunger at some point in the year. In addition, child hunger rates in Oregon are more alarming. According to a study completed by Feeding America, in conjunction with USDA food insecurity measurements, Oregon's child food insecurity for 2011 was 29.1%, meaning 29.1% of Oregon children experienced hunger at some point during the year. Obtaining tabulations through this agreement will help Oregon to continue to combat hunger, improving health and well-being of Oregonians. This data sharing agreement will assist the Oregon Department of Human Services in reaching underserved populations, continuing to battle hunger, maximizing nutrition education efforts and realizing potential federal fiscal benefits.

3. TERMS AND CONDITIONS

Pursuant to this agreement, the Oregon Department of Human Services, hereinafter referred to as "the state program agency" shall transfer records to the Census Bureau from the administration of SNAP and TANF, hereinafter referred to as "the state data" and as described in Attachment A of this agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act, 5 U.S.C. 552a. To the extent provided by law, only Census Bureau staff and Special Sworn Status ("SSS") researchers will have access to the data. Any data, records, or other information shared through this data sharing agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this agreement, it may not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

- a. The state program agency agrees:
 - i. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of SNAP and administration of TANF for the years 2015—2021, as described in Attachment A.
 - ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, record length and data dictionary.
 - iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers may not contain any state data or direct identifiers.
 - iv. To allow the Census Bureau staff and SSS researchers to use the state data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

- i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.
- ii. To provide the state program agency a table package based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American Community Survey (ACS). A table package shall include estimated rates of program eligibility and access/participation for the state overall and by various demographic, economic, and household characteristics and by county when the data allow. It also will include distributions across the same characteristics both for program participants and for those who are estimated to be eligible but do not participate. The table package will be delivered either within six (6) months from the date that the state administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.
- iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to SNAP and TANF and resulting from use under this agreement of the state data. If no comments are received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this agreement.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the agreement to prevent unauthorized use.

Processing Sites: Bowie Computer Center
 Suitland Federal Center
 Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact ("POC") for the agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency POC:

Maurice Walker
EBT Coordinator
Office of Self-Sufficiency Programs
500 Summer St NE E48, Salem, OR 97301
503-945-6075
maurice.walker@state.or.us

Census Bureau POC:

Dr. Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement shall terminate six (6) years following the date on which it becomes effective. If, at the end of six (6) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, in order to determine whether it should be revised, renewed or canceled. The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Notwithstanding all other provisions of this agreement, the parties agree that:

- a. This agreement may be amended at any time by written mutual consent of both parties.
- b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

The original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3, Terms and Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in

Attachment B will not be discontinued due to expiration or termination of this agreement.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

7. CONFIDENTIALITY

Oregon State Statute, ORS 411.320, protects the confidentiality of the state data, as well as:

- Medicaid, 42 U.S.C. § 1396(a)(a)(7), 42 CFR Part 431.300-307;
- Temporary Assistance to Needy Families, 42 U.S.C. § 602 (a)(1)(A)(iv);
- Supplemental Nutrition Assistance Program, 7 U.S.C. § 2020 (e)(8);
- 7 CFR Part 272.1(c);
- Social Security Act, 42 U.S.C. § 1396(a)(a)(7);
- Social Security Administration Disclosure, 20 CFR Part 401;
- Child Support, 42 U.S.C. § 654(26);
- Public Assistance Programs (Public Welfare), 45 CFR Part 205.50; and
- U.S. Department of Labor Employment and Training Administration, 20 CFR Part 603.

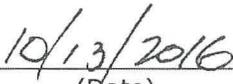
The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the Chief Information Officer ("CIO"), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

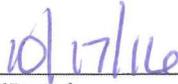
All information and information systems are categorized in accordance with NIST FIPS 199 "Standards for Security Categorization of Federal Information and Information Systems" and NIST Special Publication 800-60r1 "Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices." Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with Office of Management and Budget (OMB) Memorandum 6-19 and M-07-16. Known or suspected losses of protected data will be reported within one (1) hour to the United States Computer Emergency Readiness Team ("US CERT"). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

8. APPROVALS

Michael Thieme (Date)
Acting Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

Kim Fredlund (Date)
Director, Self-Sufficiency Programs
Oregon Department of Human Services

Attachment A: Data Elements

1. Data Requirements

Data from the administration of SNAP and TANF for the years 2015—2021 will include, when available:

- a. Case unit identifiers,
- b. Complete monthly case unit address history (residence, mailing),
- c. Benefit amounts received (monthly),
- d. Income reporting requirement (simplified reporting, change reporting, etc.),
- e. Gross income (monthly),
- f. Net income (monthly),
- g. Eligibility and denial information,
- h. Identifiers for individuals in case units, and
- i. The following information on individuals in a case unit:
 - i. Name
 - ii. Social Security Number
 - iii. Case unit/main contact phone number
 - iv. Relationship to primary recipient
 - v. Race
 - vi. Hispanic origin/Ethnicity
 - vii. Sex
 - viii. Date of birth
 - ix. Education
 - x. Employment
 - xi. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)

Attachment B: Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records

The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of state programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing likely eligible non-participants of SNAP

Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

- A. validating and enhancing the Master Address File (MAF);¹
- B. designing and assigning resources to carry out the 2020 Census;²
- C. unduplicating public, private, and census lists; and
- D. imputing missing data.³

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.

2 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.

3 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE STATE OF MARYLAND FAMILY INVESTMENT ADMINISTRATION,
DEPARTMENT OF HUMAN SERVICES

Agreement No. [2064-FY19-NFE-0304.000]

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the State of Maryland Family Investment Administration (FIA), Department of Human Services (DHS) for the acquisition of Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF) data contained in the Client Automated Resource and Eligibility System (CARES) and the Maryland WORKS system.

2. AUTHORITY

The authority for the Census Bureau to enter into this Agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the State of Maryland FIA DHS to share SNAP data and enter into this Agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026. The Food and Nutrition Act of 2008 limits the use of SNAP recipient information to those directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on October 24, 2017 has determined that the Census Bureau is directly connected with the administration of the SNAP program because Census will provide to the state copies of its research tabulations for the state to use in administering its SNAP program.

The authority for the State of Maryland FIA DHS to share TANF data and enter into this Agreement is consistent with Section 1137 of the Social Security Act and Section 205.50 of Title 45, Code of Federal Regulations.

Additional authority for the state program agency to enter into this agreement is Md. Code Ann., Human Services § 1-201, General Provisions Article, Section 4-202, *et seq.*, and COMAR 07.01.07.04 and COMAR.

3. TERMS AND CONDITIONS

Pursuant to this Agreement, the State of Maryland FIA DHS, hereinafter referred to as "the state program agency" shall transfer records to the Census Bureau from the CARES and Maryland WORKS system, hereinafter referred to as "the state data" and as described in Attachment A of this Agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the

Privacy Act. To the extent provided by law, only Census Bureau staff and those Special Sworn Status (SSS) researchers participating in the projects will have access to the data. Access shall be limited to the minimum number of individuals necessary. Any data, records, or other information shared through this research Agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it may not be disclosed in individually-identifiable form that permits the identification of any individual respondents, businesses, organizations, or institutions, and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. To the extent provided by law, the Census Bureau will recognize the state program agency as the owner of the original data in the form that it is delivered to the Census Bureau, prior to its integration with confidential Census data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

- i. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of SNAP and administration of TANF for the years 2017—2024, as described in Attachment A.**
- ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this Agreement; including definitions of active participants, a record layout, record count, record length and data dictionary.**
- iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers may not contain any state data or direct identifiers.**
- iv. To allow the Census Bureau staff and SSS researchers to use the state data at the Processing Sites listed in Section 4 of this Agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this Agreement.**

b. The Census Bureau agrees:

- i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this Agreement and only for the projects listed in Attachment B or those approved in writing by both parties.**
- ii. To provide the state program agency with a copy of data tabulations that the Census Bureau will create for Census research purposes. Specifically, the Census Bureau will provide the state program agency with data tabulations based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American Community Survey (ACS). Data tabulations shall include estimated rates of program eligibility and access/participation for the state**

overall and by various demographic, economic, and household characteristics and by county when the data allow. It also will include distributions across the same characteristics both for program participants and for those who are estimated to be eligible but do not participate. The data tabulations will be delivered either within six (6) months from the date that the state administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.

- iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to SNAP and TANF and resulting from use under this Agreement of the state data. If no comments are received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this Agreement.
- iv. As required by 5 U.S.C. § 2302(b)(13), any restriction with respect to disclosure by a Government employee must be consistent with, not supersede, nor conflict with, or otherwise alter the employee obligations, rights, or liabilities created by existing statute or Executive order relating to (1) classified information, (2) communications to Congress, (3) the reporting to an Inspector General of a violation of any law, rule, or regulation, or mismanagement, a gross waste of funds, an abuse of authority, or a substantial and specific danger to public health or safety, or (4) any other whistleblower protection. The definitions, requirements, obligations, rights, sanctions, and liabilities created by controlling Executive orders and statutory provisions are incorporated into this agreement and are controlling. This paragraph shall not be construed to authorize the withholding of information from Congress or the taking of any personnel action against an employee who discloses information to Congress.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this Agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the Agreement to prevent unauthorized use. The parties mutually agree that the following locations are designated for data processing, analysis, and storage within the Census Network:

Sites: Bowie Computer Center or Other Approved Census Computer Centers
 Suitland Federal Center
 Federal Statistical Research Data Centers
 Census Approved Cloud Services

The parties mutually agree that the following named individuals will be designated as points of contact for the Agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency POC:

Augustin Ntabaganyimana, MPA
Deputy Executive Director for Operations
Family Investment Administration
Maryland Department of Human Services
311 West Saratoga Street
Baltimore, MD 21201
(410) 767-7571
augustin.ntabaganyimana@maryland.gov

Census Bureau POC:

Michael Berning
Assistant Division Chief
Data Acquisition and Curation
Economic Reimbursable Surveys Division
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-2028
michael.a.berning@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This Agreement is effective on the date on which it is signed by both parties. The Agreement shall terminate six (6) years following the date on which it becomes effective. If, at the end of six (6) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this Agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the Agreement, in order to determine whether it should be revised, renewed or canceled. The review will be conducted by the Census Bureau's Assistant Director for Economic Programs and the state program agency.

Notwithstanding all other provisions of this Agreement, the Parties agree that:

- a. This Agreement may be amended at any time by written mutual consent of both parties.
- b. Either party may terminate this Agreement upon thirty (30) days written notice to the other party.

To the extent permitted by federal law, the original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two

(2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3, Terms and Conditions. Any revisions to the data retention timetable after the execution of this Agreement will be stated in writing in an amendment to this Agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this Agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this Agreement.

To promote organizational transparency, and in support of data discovery for current and future research projects, the U.S. Census Bureau posts non-sensitive data documentation to public-facing websites. This documentation, such as a record layout or data dictionary, can include file descriptions, variable lists, variable labels and valid values for each variable.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this Agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5 U.S.C. App. 3, a review of this Agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this Agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

The Census Bureau will promptly consider and adjudicate, in accordance with Federal law, claims which may arise for damages of any nature arising out of a Census Bureau act under this Agreement. Such adjudication will be pursued under the Federal Tort Claims Act, 28 U.S.C. Section 2671 et seq., the Federal Employees Compensation Act, 5 U.S.C. Section 8101 et seq., or such other legal authority as may be pertinent. The U.S. Department of Justice shall determine the appropriate venues for any litigation arising under this Agreement.

7. CONFIDENTIALITY

A. IT Security

Md. Code Ann., Human Services § 1-201 protects the confidentiality of the state data, as well as:

- Medicaid, 42 U.S.C. § 1396(a)(a)(7), 42 CFR Part 431.300-307;

- Temporary Assistance to Needy Families, 42 U.S.C. § 602 (a)(1)(A)(iv);
- Supplemental Nutrition Assistance Program, 7 U.S.C. § 2020 (e)(8);
- 7 CFR Part 272.1(c);
- Social Security Act, 42 U.S.C. § 1396(a)(a)(7);
- Social Security Administration Disclosure, 20 CFR Part 401;
- Child Support, 42 U.S.C. § 654(26);
- Public Assistance Programs (Public Welfare), 45 CFR Part 205.50; and
- U.S. Department of Labor Employment and Training Administration, 20 CFR Part 603.

The Census Bureau will comply with all federal laws applicable to the privacy or security of data received pursuant to this Agreement. As a federal agency, the Census Bureau is not subject to state laws, however the Census Bureau will comply with the requirements of applicable state laws to the extent that they do not conflict with the Census Bureau's requirements under federal law.

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, United States Code. The data provided under this Agreement are confidential under 13, U.S.C. § 9. Per the Federal Cybersecurity Enhancement Act of 2015, these data are also protected from cybersecurity risks through screening of the systems that transmit the data. Upon receipt, all data acquired as a result of this Agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with the Federal Information Security Modernization Act of 2014, Public Law 113-283. All systems are fully assessed against NIST Special Publication 800-53r4 "Recommended Security Controls for Federal Information Systems and Organizations," as well as Special Publication 800-37r2 "Risk Management Framework for Information Systems and Organizations: A System Life Cycle Approach for Security and Privacy." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO (Chief Information Officer), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices.*" Security controls and subsequent assessments are to be completed based on the final categorization.

Cloud providers must be approved for at least moderate level information through the GSA FedRAMP process prior to acquiring any services. Census Bureau identifies, assesses and authorizes use based on the published FedRAMP results and an assessment of any Census Bureau (customer provided) controls implemented to protect the infrastructure and data. Security reporting on cloud providers is reported to the Department of Commerce on a regular basis under FISMA.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum M-17-12. Known or suspected losses of protected data are to be reported within one (1) hour of its discovery to the Bureau of the Census Computer Incident Response Team (BOC

CIRT) who will report as required to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau becomes aware of a known breach of the State Data, the Census Bureau will contact the state program agency contacts to discuss the actions and potential remedies regarding the incident.

B. Disclosure Avoidance Review of Statistical Products

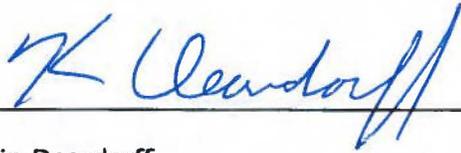
Title 13, Section 9 of the United States Code (U.S.C.) requires the Census Bureau to keep confidential the information collected from the public under the authority of Title 13. Section 214 of Title 13, U.S.C., and Sections 3551, 3559 and 3571 of Title 18, U.S.C., provide for the imposition of penalties of up to five years in prison and/or up to \$250,000.00 in fines for wrongful disclosure of confidential census information.

Disclosure avoidance is the process for protecting the confidentiality of data, as required under Title 13 U.S.C. A disclosure of data occurs when someone can use published statistical information to identify an individual who has provided confidential information under a pledge of confidentiality. For data tabulations, the Census Bureau uses disclosure avoidance procedures to modify or remove the characteristics that put confidential information at risk for disclosure. Although a published table may appear to show information about a specific individual, the Census Bureau has taken steps to disguise or suppress the original data, while making sure the results are still useful. The techniques used by the Census Bureau to protect confidentiality in tabulations vary, depending on the type of data.

Noise injection is the Census Bureau's preferred disclosure avoidance technique. By policy, noise injection is applied to all data products that are reported with geographies smaller than a state. In cases when it is not feasible to fully implement noise injection within the period of the contract, a transition plan for implementing noise injection or other provable privacy methods must be developed in coordination with the Census Bureau. Noise injection may be required for microdata releases, depending on the characteristics of the microdata and the specific variables that are to be released. Data that cannot be publicly released may still be analyzed within the Federal Statistical Research Data Centers (FSRDCs) by individuals who have Special Sworn Status; the results of such analyses must still go through a disclosure avoidance process prior to being publicly released.

The parties understand that Title 13 confidentiality protection and disclosure avoidance techniques apply to all work described in this Agreement. The disclosure avoidance disclosure methods are defined by the Census Bureau which has the responsibility of carrying out that work. Accordingly, upon completion of the tabulation, the data produced must be reviewed by the Census Bureau to ensure that no identifiable Title 13 data are or may be disclosed. Should the Census Bureau's Disclosure Review Board (DRB) determine that the requested statistical product does or reasonably could result in such disclosure, then the data product will be modified prior to approval for release to the party(ies) to this Agreement. The DRB must approve before a research product can be released to an individual who does not have SSS and a need to know, or moved to a computer not approved for controlled data according to Census' existing policies and procedures.

8. APPROVALS



9/12/19

Kevin Deardorff
Chief, Economic Reimbursable Surveys Division
U.S. Census Bureau

(Date)



8/22/19

Netsanet Kibret
Executive Director, Family Investment Administration
Maryland Department of Human Services

(Date)

Attachment A: Data Elements

1. Data Requirements

Monthly data from the CARES for each program for the years 2017-2024, and from the Maryland WORKS system for each program for the years 2017–2024 will include, when available:

- a. Case unit identifiers,
- b. Active Participant definitions,
- c. Complete monthly case unit address history (residence, mailing),
- d. Monthly Benefits data (any of the available: benefits received date, benefits amount issued/received, and benefit amount redeemed),
- e. Income reporting requirement (simplified reporting, change reporting, etc.),
- f. Gross income (monthly),
- g. Net income (monthly),
- h. Eligibility and denial information,
- i. Identifiers for individuals in case units, and
- j. The following information on individuals in a case unit:
 - i. Name
 - ii. Last four (4) digits of the Social Security Number
 - iii. Case unit/main contact phone number
 - iv. Relationship to primary recipient
 - v. Race
 - vi. Hispanic origin/Ethnicity
 - vii. Sex
 - viii. Date of birth
 - ix. Gross income (monthly)
 - x. Net Income (monthly)
 - xi. Monthly income source (earnings, TANF and general assistance)
 - xii. Education
 - xiii. Employment

Attachment B: Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records

The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of state programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing likely eligible non-participants of SNAP

Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative

records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

- A. validating and enhancing the Master Address File (MAF);¹
- B. designing and assigning resources to carry out the 2020 Census;²
- C. unduplicating public, private, and census lists; and
- D. imputing missing data.³

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical

1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.

2 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.

3 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE OFFICE OF TEMPORARY AND DISABILITY ASSISTANCE OF THE STATE OF NEW YORK

Agreement No. [0094-FY16-NFE-0071]

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Office of Temporary and Disability Assistance, an agency of the State of New York (NYS OTDA), for the acquisition of data from the Supplemental Nutrition Assistance Program (SNAP) and Public Assistance programs (TANF).

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the New York Office of Temporary and Disability Assistance to share SNAP data and enter into this agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026. The Food and Nutrition Act of 2008 limits the use of SNAP recipient information to those directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the SNAP program because Census will provide to the state copies of its tabulations of the data for the state to use in administering its SNAP program.

The authority for the New York Office of Temporary and Disability Assistance to share TANF data from the Public Assistance programs and enter into this agreement is the Public Health and Welfare Act, 42 U.S.C. § 613.

3. TERMS AND CONDITIONS

Pursuant to this agreement, the New York Office of Temporary and Disability Assistance, hereinafter referred to as "the state program agency" shall transfer records to the Census Bureau from the administration of SNAP and Public Assistance programs, hereinafter referred to as "the state data" and as described in Attachment A of this agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and Special Sworn Status ("SSS") researchers will have

access to the data. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it may not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

- i. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of SNAP and administration of Public Assistance programs for the years 2013–2020, as described in Attachment A.
- ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, record length and data dictionary.
- iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers may not contain any state data or direct identifiers.

Research projects exploring whether the administrative records represent the same individuals in survey or census households may need access to name data. Access to name data will only be granted through approval by the Census Bureau Data Stewardship Executive Policy Committee. Researchers may not have access to Social Security Numbers.

- iv. To allow the Census Bureau staff and SSS researchers to use the state data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

- i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.
- ii. To provide the state program agency a table package based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American Community Survey (ACS). A table package shall include estimated rates

Census Bureau POC: Dr. Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
U.S. Census Bureau
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Washington, DC 20233
(301) 763-5757
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The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement shall terminate five (5) years following the date on which it becomes effective. If, at the end of five (5) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, in order to determine whether it should be revised, renewed or canceled. The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Notwithstanding all other provisions of this agreement, the Parties agree that:

- a. This agreement may be amended at any time by written mutual consent of both parties.
- b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

The original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3. Terms and Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

7. CONFIDENTIALITY

New York statutes 18 NYCRR 357.2 and 387.2(j), and New York SSL section 136.2, protect the confidentiality of the state data, as well as:

- Medicaid, 42 U.S.C. § 1396(a)(a)(7), 42 CFR Part 431.300-307;
- Temporary Assistance to Needy Families, 42 U.S.C. § 602 (a)(1)(A)(iv);
- Supplemental Nutrition Assistance Program, 7 U.S.C. § 2020 (e)(8);
- 7 CFR Part 272.1(c);
- Social Security Act, 42 U.S.C. § 1396(a)(a)(7);
- Social Security Administration Disclosure, 20 CFR Part 401;
- Child Support, 42 U.S.C. § 654(26);
- Public Assistance Programs (Public Welfare), 45 CFR Part 205.50; and
- U.S. Department of Labor Employment and Training Administration, 20 CFR Part 603.

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the Chief Information Officer ("CIO"), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "Standards for Security Categorization of Federal Information and Information Systems" and NIST Special Publication 800-60r1 "Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices." Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team ("US CERT"). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

8. APPROVALS



7/13/16

Ron Jarmin
Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

(Date)



10/5/16

Samuel D. Roberts
Commissioner
New York State Office of Temporary and Disability Assistance

(Date)

Attachment A: Data Elements

1. Data Requirements

Data from the administration of SNAP and Public Assistance programs for the years 2013-2020 will include, when available:

- a. Case unit identifiers,
- b. Complete monthly case unit address history (residence or mailing, if residence is unavailable),
- c. History of benefit amounts received (monthly),
- d. Eligibility and most recent application date,
- e. Unique identifiers for individuals in case units, and
- f. The following information on individuals in a case unit:
 - i. Name
 - ii. Social Security Number
 - iii. Sex
 - iv. Date of birth
 - v. Education (highest degree/highest grade level)
 - vi. Monthly income source (TANF, general assistance)
 - vii. History of membership in case unit (as provided/derived from monthly records)

Attachment B: Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records

The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of state programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing likely eligible non-participants of SNAP

Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to

each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

- A. validating and enhancing the Master Address File (MAF);¹
- B. designing and assigning resources to carry out the 2020 Census;²
- C. unduplicating public, private, and census lists; and
- D. imputing missing data.³

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American

1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.

2 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.

3 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE NEW JERSEY DEPARTMENT OF HUMAN SERVICES

Agreement No. 0094-2015-NFE-009

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau and the New Jersey Department of Human Services for the acquisition of Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF) data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the New Jersey Department of Human Services to share SNAP data and enter into this agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026 and N.J.A.C. 10:87-1.2. The Food and Nutrition Act of 2008 limits the use of SNAP recipient information to those parties directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture, Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the SNAP program because the Census Bureau will provide to the state copies of its tabulations of the data for the state to use in administering its SNAP program.

The authority for the New Jersey Department of Human Services to share TANF data and enter into this agreement is the Public Health and Welfare Act, 42 U.S.C. § 613 and N.J.S.A. 44:10-47.

The Census Bureau shall protect the individually identifiable health information provided under this agreement in accordance with 13 U.S.C. Section 9. Both parties agree that the terms of this MOU provide sufficient protection to allow the New Jersey Department of Human services to satisfy its requirements to protect data pursuant to the Health Insurance Portability and Accountability Act.

3. TERMS AND CONDITIONS

Pursuant to this agreement, the New Jersey Department of Human Services, hereinafter referred to as "the state program agency," shall transfer records to the Census Bureau from the administration of SNAP and TANF, hereinafter referred to as "the state data,"

and as described in Attachment A of this agreement. All data that the state program agency agrees to provide the Census Bureau shall remain confidential. Maintaining confidentiality of these data is also guaranteed under Title 13 U.S.C, Section 9, and the Privacy Act of 1974. Only Census Bureau staff and Special Sworn Status (“SSS”) researchers will have access to the data. Any data, records, or other information shared through this research agreement shall be protected from unauthorized disclosure and shall be used solely for statistical purposes. When the Census Bureau publicly releases information related to this research, it shall not be disclosed in individually-identifiable form, and results will meet the Census Bureau disclosure avoidance guidelines. The Census Bureau shall link the state data to census data, survey data and administrative records data. The Census Bureau shall use the linked data for research and operations to improve data collection, and record linkage methods for surveys and decennial censuses. The Census Bureau shall also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

a. The state program agency agrees:

- i. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) or appropriately encrypted CD-ROM or DVD-ROM, data from the State’s database for the years 2004–2020, or available years, as described in Attachment A.
- ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement, including a record layout, record count, record length and data dictionary.
- iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers may not contain any state data or direct identifiers.

Research projects exploring whether the administrative records represent the same individuals in survey or census households may need access to name data. Access to name data will only be granted through approval by the federal Census Bureau Data Stewardship Executive Policy Committee. Researchers shall not have access to Social Security Numbers.

- iv. To allow the Census Bureau staff and SSS researchers to use the state data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B, and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

- i. To grant access to the state data only to the Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement, and only for the projects listed in Attachment B or those approved in writing by both parties.
- ii. To provide the state program agency, within six (6) months of the time the data is processed and provided to the Census Bureau research staff, selected tabulations of the state data linked to the American Community Survey. These tabulations shall describe the demographic and household characteristics of residents who are likely to be eligible for SNAP, but who do not participate in the program.
- iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments, clearance, or rejection of pre-publication copies of any report or other document containing information derived from the state program agency data pertaining to SNAP and TANF and resulting from use under this agreement of the state data. If no response is received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no response is received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have approved the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this agreement.

4. CONTACTS

The parties mutually agree that the following named individual is to be designated as custodian of the files on behalf of the Census Bureau and shall be personally responsible for the observance of all conditions of use, and for the establishment and maintenance of security arrangements to prevent unauthorized use as specified in the agreement. The Census Bureau agrees to notify the state program agency within fifteen (15) days of any changes of custodianship.

Custodian:

J. Trent Alexander
Data Custodian
U.S. Census Bureau
4600 Silver Hill Road, 2K133
Washington DC 20233
(301) 763-9810
j.trent.alexander@census.gov

Processing Sites: Bowie Computer Center
 Suitland Federal Center
 Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the state program agency and the Census Bureau, respectively:

State of New Jersey program agency POC:
 Natasha Johnson
 Director
 NJ Department of Human Services
 Division of Family Development
 P.O. Box 716
 Trenton, NJ 08625
 (609) 588-2402
 Natasha.Johnson@dhs.state.nj.us

Census Bureau POC: Amy O'Hara
 Center Chief
 Center for Administrative Records Research and Applications
 U.S. Census Bureau
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 (301) 763-5757
 amy.b.ohara@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement shall terminate five (5) years following the date on which it becomes effective. If at the end of five (5) years the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this agreement at least once every three (3) years, or whenever a Federal or State statute is enacted that materially affects the substance of the agreement, in order to determine whether it should be revised, renewed or canceled. The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Notwithstanding all other provisions of this agreement, the Parties agree that:

- a. This agreement may be amended at any time by written mutual consent of both parties.

- b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

The original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3. Terms and Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data, as part of the projects described in Attachment B, will not be discontinued due to expiration or termination of this agreement.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

7. CONFIDENTIALITY

State Statutes or Acts protect the confidentiality of the state data, as well as:

- Temporary Assistance to Needy Families, 42 U.S.C. § 602 (a)(1)(A)(iv);
- Supplemental Nutrition Assistance Program, 7 U.S.C. § 2020 (e)(8);
- 7 CFR Part 272.1(c);
- Social Security Act, 42 U.S.C. § 1396(a)(a)(7);
- Social Security Administration Disclosure, 20 CFR Part 401;
- Public Assistance Programs (Public Welfare), 45 CFR Part 205.50; and
- Public Welfare, Security and Privacy, Uses and Disclosures, 45 CFR 164.504 (e)(3)

The Census Bureau assumes an obligation to safeguard all data received from other federal and state agencies and commercial entities pursuant to federal and State laws and regulations, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60.

The Census Bureau agrees to remain compliant with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347).

All systems shall be fully assessed against NIST Special Publication 800-53r3 "Recommended Security Controls for Federal Information Systems and Organizations," as well as Special Publication 800-37r1 "Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach." The Census Bureau IT Security Program shall be reviewed annually by the {Department of Commerce, Office of the Chief Information Officer ("CIO")}, as well as the {Department of Commerce, Office of Inspector General}, as part of the oversight responsibilities.

All information and information systems shall be categorized in accordance with NIST FIPS 199 "Standards for Security Categorization of Federal Information and Information Systems" and NIST Special Publication 800-60 "Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices." Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau shall maintain a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team ("US CERT"). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

8. APPROVALS

Tommy Wright for 8/18/2015
(Date)

Ron Jarmin
Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

Elizabeth Connolly 10/1/15
(Date)

Elizabeth Connolly
Commissioner
NJ Department of Human Services

Attachment A: Data Elements

1. Data Requirements

Data from the administration of SNAP and TANF for the years 2004–2020 will include, when available:

- a. Case unit identifiers,
- b. Complete monthly case unit address history (residence, mailing),
- c. History of benefit amounts received (monthly),
- d. Income reporting requirement (simplified reporting, change reporting, etc.),
- e. Gross income (monthly),
- f. Net income (monthly),
- g. Eligibility and denial information,
- h. Identifiers for individuals in case units, and
- i. The following information on individuals in a case unit:
 - i. Name
 - ii. Social Security Number
 - iii. Relationship to primary recipient
 - iv. Race
 - v. Hispanic origin/Ethnicity
 - vi. Sex
 - vii. Date of birth
 - viii. Education
 - ix. Employment
 - x. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)
 - xi. History of membership in case unit

Attachment B: Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records

The U.S. Census Bureau administers multiple household surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of state programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing likely eligible non-participants of SNAP

Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to

each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research and Planning for the 2020 Census

The Census Bureau intends to test and potentially use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau intends to use state program information, along with data from federal, state, and private sources, to pursue the following four research initiatives, leading to improvements in quality and efficiency of 2020 Census operations:

- A. validating and enhancing the Master Address File (MAF);¹
- B. designing and assigning resources to carry out the 2020 Census;²
- C. unduplicating public, private, and census lists; and
- D. imputing missing data.³

Data quality will be explored using 2010 decennial census data to assess the quality and utility of household roster, location, and demographic characteristics data.

Disagreement observed in content across sources will be analyzed to develop approaches, such as modeling or business rules, to resolve conflicting information.

Administrative records will be assessed to tabulate data at various levels of geography, including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census to assess accuracy based on the level of aggregation.

1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.

2 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.

3 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE MICHIGAN DEPARTMENT OF HEALTH AND HUMAN SERVICES

Agreement No. 0094-FY17-NFE-0085

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Michigan Department of Health and Human Services (MDHHS) for the acquisition of Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF) data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the MDHHS to share SNAP data and enter into this agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026. The Food and Nutrition Act of 2008 limits the use of SNAP recipient information to those directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the SNAP program because Census will provide to the state copies of its tabulations of the data for the state to use in administering its SNAP program.

The authority for the MDHHS to share TANF data and enter into this agreement is the Public Health and Welfare Act, 42 U.S.C. § 613.

3. TERMS AND CONDITIONS

Pursuant to this agreement, the MDHHS, hereinafter referred to as "the state program agency" will transfer records to the Census Bureau from the administration of SNAP, TANF, and WIC hereinafter referred to as "the state data" and as described in Attachment A of this agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and Special Sworn Status ("SSS") researchers will have access to the data. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information

related to this research, it will not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

- i. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of SNAP and administration of TANF for the years 2010—2021, as described in Attachment A.
- ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, record length and data dictionary.
- iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers may not contain any state data or direct identifiers.
- iv. To allow the Census Bureau staff and SSS researchers to use the state data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

- i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.
- ii. To provide the state program agency a table package based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American Community Survey (ACS). A table package shall include estimated rates of program eligibility and access/participation for the state overall and by various demographic, economic, and household characteristics and by county when the data allow. It also will include distributions across the same characteristics both for program participants and for those who are estimated to be eligible but do not participate. The table package will be delivered either within six (6) months from the date that the state administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.

- iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to SNAP and TANF and resulting from use under this agreement of the state data. If no comments are received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this agreement.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the agreement to prevent unauthorized use.

Processing Sites: Bowie Computer Center
 Suitland Federal Center
 Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency POC: SNAP/TANF

George Noonan
Manager, Data Strategy Group
Department of Health and Human Services
235 S. Grand Avenue
Lansing, MI 48909
517 335-7756
noonang@michigan.gov

Census Bureau POC: Dr. Amy O'Hara
 Center Chief
 Center for Administrative Records Research and Applications
 U.S. Census Bureau
 4600 Silver Hill Rd
 Washington, DC 20233
 (301) 763-5757
 amy.b.ohara@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement shall terminate six (6) years following the date on which it becomes effective. If, at the end of six (6) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, in order to determine whether it should be revised, renewed or canceled. The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Notwithstanding all other provisions of this agreement, the Parties agree that:

- a. This agreement may be amended at any time by written mutual consent of both parties.
- b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

The original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3. Terms and Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of

Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

7. CONFIDENTIALITY

Michigan Public Act 280, Section 400.11c protects the confidentiality of the state data, as well as:

- Medicaid, 42 U.S.C. § 1396(a)(a)(7), 42 CFR Part 431.300-307;
- Temporary Assistance to Needy Families, 42 U.S.C. § 602 (a)(1)(A)(iv);
- Supplemental Nutrition Assistance Program, 7 U.S.C. § 2020 (e)(8);
- 7 CFR Part 272.1(c);
- Social Security Act, 42 U.S.C. § 1396(a)(a)(7);
- Social Security Administration Disclosure, 20 CFR Part 401;
- Child Support, 42 U.S.C. § 654(26);
- Public Assistance Programs (Public Welfare), 45 CFR Part 205.50; and
- U.S. Department of Labor Employment and Training Administration, 20 CFR Part 603.

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the Chief Information Officer ("CIO"), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*." Security controls and subsequent assessments are to be completed based on the final categorization.

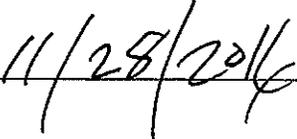
The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United

States Computer Emergency Readiness Team ("US CERT"). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

8. APPROVALS

 _____ 

Michael Thieme (Date)
Acting Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

 _____ 

Laurie Johnson (Date)
Director, Support Services, Business Integration Center
Michigan Department of Health & Human Services

Attachment A: Data Elements

1. Data Requirements

Monthly data from the administration of SNAP and TANF for the years 2010—2021 will include, when available:

- a. Case unit identifiers,
- b. Complete monthly case unit address history (residence, mailing),
- c. Benefit amounts received (monthly),
- d. Income reporting requirement (simplified reporting, change reporting, etc.),
- e. Gross income (monthly),
- f. Net income (monthly),
- g. Eligibility and denial information,
- h. Identifiers for individuals in case units, and
- i. The following information on individuals in a case unit:
 - i. Name
 - ii. Social Security Number
 - iii. Case unit/main contact phone number
 - iv. Relationship to primary recipient
 - v. Race
 - vi. Hispanic origin/Ethnicity
 - vii. Sex
 - viii. Date of birth
 - ix. Education
 - x. Employment
 - xi. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)

Attachment B: Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records

The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of state programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing likely eligible non-participants of SNAP

Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to

each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

- A. validating and enhancing the Master Address File (MAF);¹
- B. designing and assigning resources to carry out the 2020 Census;²
- C. unduplicating public, private, and census lists; and
- D. imputing missing data.³

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American

1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.

2 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.

3 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
WOMEN, INFANTS, AND CHILDREN ADMINISTRATIVE DATA
FROM
THE MICHIGAN DEPARTMENT OF HEALTH AND HUMAN SERVICES

Agreement No. 0094-FY17-NFE-0088

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Michigan Department of Health and Human Services (MDHHS) for the acquisition of Women, Infants, and Children (WIC) Administrative Data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the MDHHS to share WIC data and enter into this agreement is Section 17 of the Child Nutrition Act of 1966, 42 U.S.C. § 1786 and Implementing regulations at 7 CFR Part 246. WIC regulations at 7 CFR 246.26(d)(1)(ii) limit the disclosure of WIC recipient information to those directly connected with the administration or enforcement of the WIC program. The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the WIC program because Census will provide to the state copies of its tabulations of the data for the state to use in administering its WIC program.

3. TERMS AND CONDITIONS

Pursuant to this agreement, the MDHHS WIC Program hereinafter referred to as "the state program agency", will transfer records to the Census Bureau from the administration of WIC, hereinafter referred to as "the state data" and as described in Attachment A of this agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and Special Sworn Status ("SSS") researchers will have access to the data. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it will not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey

data and administrative records data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

- i. To transfer to the Census Bureau via secure FTP (File Transfer Protocol) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of WIC for the years 2010–2021, as described in Attachment A.
- ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, and record length.
- iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers will not contain any state data or direct identifiers.

Research projects exploring whether the administrative records represent the same individuals in survey or census households may need access to name data. Access to name data will only be granted through approval by the Census Bureau Data Stewardship Executive Policy Committee. Researchers will not have access to Social Security Numbers.

- iv. To allow the Census Bureau staff and Special Sworn Status (SSS) researchers to use the state data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.1 of this agreement.

b. The Census Bureau agrees:

- i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.
- ii. To provide the state program agency a table package based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American Community Survey (ACS). A table package shall include estimated rates of program eligibility and access/participation for the state overall and by various demographic, economic, and household characteristics and by county when the data allow. It also will include distributions across the same characteristics both for program participants and for those who are estimated to be eligible but do not participate. The table package will be delivered either within six (6) months from the date that the state administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.

- iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to WIC and resulting from use under this agreement of the state data. If no comments are received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this agreement.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the agreement to prevent unauthorized use.

Processing Sites: Bowie Computer Center
 Suitland Federal Center
 Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency POC:

Dr. Kobra Eghtedary
Director of Data, Research & Technology
Michigan WIC Program
320 S. Walnut St., Lansing, MI - 48913
(517) 335-9834
EghtedaryK@Michigan.Gov

Census Bureau POC:

Dr. Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement will terminate six (6) years following the date on which it becomes effective. If, at the end of six (6) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties will review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, in order to determine whether it should be revised, renewed or canceled. The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Notwithstanding all other provisions of this agreement, the Parties agree that:

- a. This agreement may be amended at any time by written mutual consent of both parties.
- b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

The original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3. Terms and Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

7. CONFIDENTIALITY

Michigan State HIPAA Privacy protects the confidentiality of the state data, as well as WIC regulations at 7 CFR 246.26(e). The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO (Chief Information Officer), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*." Security controls and subsequent assessments are to be completed based on the final categorization.

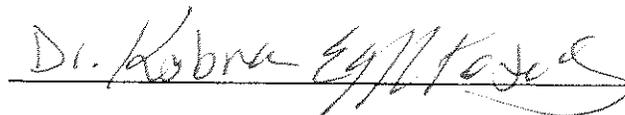
The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

8. APPROVALS



Dr. John Eltinge
Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

12/27/2016
(Date)



Dr. Kobra Eghtedary
Director of Data, Research and Technology
MDHHS / Michigan WIC Program

1-19-17
(Date)

Attachment A: Data Elements

1. Data Requirements

Monthly data from the administration of WIC for the years 2010—2021 will include, when available:

- a. Case unit identifiers,
- b. Complete monthly case unit address history (residence, mailing),
- c. Benefit Start and End Dates
- d. Income reporting requirement (simplified reporting, change reporting, etc.),
- e. Gross income (monthly)
- f. Identifiers for individuals in case units, and
- g. The following information on individuals in a case unit:
 - i. Name
 - ii. Case unit/main contact phone number
 - iii. Recipient or Caretaker phone number
 - iv. Race
 - v. Hispanic origin/Ethnicity
 - vi. Sex
 - vii. Date of birth
 - viii. Education
 - ix. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)

Attachment B: Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records

The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of state programs in the American Community Survey (ACS), the Current Population Survey (CPS) and the Survey of Income and Program Participation (SIPP). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing WIC participants and likely eligible non-participants of WIC

WIC data linked to ACS data can provide characteristic information for women, infants, and children participating in the WIC program. Additionally, infants and children with a high probability of being eligible for WIC can be estimated using ACS information on family structure, reported income, and public assistance.¹ The estimated eligible infants and children can be matched to the administrative WIC data to determine who is estimated to be eligible but not participating in the program, helping agencies determine unmet need. The project results can help state agencies improve outreach efforts. This research helps the Census Bureau better understand their survey and census data.

3. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System (PVS) uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records. However, coverage for

¹ Eligible pregnant and breastfeeding women cannot be identified in ACS data.

some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

- A. validating and enhancing the Master Address File (MAF);²
- B. designing and assigning resources to carry out the 2020 Census;³
- C. unduplicating public, private, and census lists; and
- D. imputing missing data.⁴

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American population and economy. As Census and other Federal Statistical Agencies successfully

² Examples of possible Census Bureau uses include updating and evaluating the Master Address File.

³ Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.

⁴ Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE NEBRASKA DEPARTMENT OF MOTOR VEHICLES

Agreement No. [#2064-FY20-NFE-0315.000]

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Nebraska Department of Motor Vehicles for the acquisition of Driver License Administrative Data, of which data may include: Driver Licenses, Identification Cards, and Junior Driver Licenses.

2. AUTHORITY

The authority for the Census Bureau to enter into this Agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the Nebraska Department of Motor Vehicles to enter into this Agreement is the Uniform Motor Vehicle Records Disclosure Act, hereinafter "the UMVRDA," found at Neb. Rev. Stat. §§ 60-2901, *et seq.* The specific authorizing statute for the release of Driver License Administrative Data is found at Neb. Rev. Stat. § 60-2907(1): "For use by any federal, state, or local government agency, including any court or law enforcement agency, in carrying out the agency's functions or by a private person or entity acting on behalf of a governmental agency in carrying out the agency's functions." The Census Bureau agrees to use the information from Driver License Administrative Data only for the purposes of carrying out its functions. This authority permits the release of basic driver license records to agencies of the Federal government. The Federal Driver's Privacy Protection Act, 18 U.S.C. §2721-2725 permits states to disclose driver license information to any government agency carrying out its functions.

3. TERMS AND CONDITIONS

Pursuant to this Agreement, the Nebraska Department of Motor Vehicles, hereinafter referred to as "the state program agency" shall transfer records to the Census Bureau from the administration of driver licensing and identification card issuance, hereinafter referred to as "the state data" and as described in Attachment A of this Agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, the UMVRDA, and the Privacy Act. To the extent provided by law, only Census Bureau staff and those Special Sworn Status (SSS) researchers participating in the projects will have access to the data. Access shall be limited to the minimum number of individuals necessary. Any data, records, or other information shared through this research Agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it may not

be disclosed in individually-identifiable form that permits the identification of any individual respondents, businesses, organizations, or institutions, and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. To the extent provided by law, the Census Bureau will recognize the state program agency as the owner of the original data in the form that it is delivered to the Census Bureau, prior to its integration with confidential Census data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics and estimates.

a. The state program agency agrees:

- i. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) or appropriately encrypted CD-ROM or DVD-ROM, data from Nebraska Department of Motor Vehicles for Drivers License and Identification Card administrative records for December 2019 – December 2021, as described in Attachment A. An initial delivery of monthly data will occur before December 31, 2019. The remaining deliveries can follow on a monthly or annual basis, including a delivery of data vintage (April 1, 2020) on or before June 30, 2020.
- ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this Agreement; including definitions of variables/data dictionary, a record layout, record count, and record length.
- iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers may not contain any state data or direct identifiers.
- iv. To allow the Census Bureau staff and SSS researchers to use the state data at the Processing Sites listed in Section 4 of this Agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this Agreement.

b. The Census Bureau agrees:

- i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this Agreement and only for the projects listed in Attachment B or those approved in writing by both parties. Census bureau may not release, disclose, use, resell, or otherwise share data unless expressly authorized by law.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this Agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the Agreement to prevent unauthorized use. The parties mutually agree

that the following locations are designated for data processing, analysis, and storage within the Census Network:

Sites: Bowie Computer Center or Other Approved Census Computer Centers
 Suitland Federal Center
 Federal Statistical Research Data Centers
 Census Approved Cloud Services

The parties mutually agree that the following named individuals will be designated as points of contact for the Agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency POC:

Kenneth Lackey
Agency Legal Counsel
Nebraska Department of Motor Vehicles
P.O. Box 94699, Lincoln, NE 68509
(402) 471-9593
kenneth.lackey@nebraska.gov

Census Bureau POC:

Michael Berning
Assistant Division Chief
Data Acquisition and Curation
Economic Reimbursable Surveys Division
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-2028
michael.a.berning@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This Agreement is effective on the date on which it is signed by both parties. The Agreement shall terminate December 31, 2021. If, at the end of the term, the parties wish to continue the relationship, they must execute a new agreement.

The parties may review this Agreement every year, or whenever a Federal statute or Nebraska law is enacted that materially affects the substance of the Agreement, in order to determine whether it should be revised, renewed or canceled. The review will be conducted by the Census Bureau's Assistant Director for Economic Programs and the state program agency.

Notwithstanding all other provisions of this Agreement, the Parties agree that:

- a. This Agreement may be amended at any time by written mutual consent of both parties.

- b. Either party may terminate this Agreement upon thirty (30) days written notice to the other party.
- c. Either party may terminate this Agreement immediately upon the discovery that the other party has violated a term of this Agreement or relevant law.

To the extent permitted by federal law, the original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3, Terms and Conditions. Any revisions to the data retention timetable after the execution of this Agreement will be stated in writing in an amendment to this Agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this Agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this Agreement.

To promote organizational transparency, and in support of data discovery for current and future research projects, the U.S. Census Bureau posts non-sensitive data documentation to public-facing websites. This documentation, such as a record layout or data dictionary, can include file descriptions, variable lists, variable labels and valid values for each variable.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this Agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher official of each agency for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5 U.S.C. App. 3, a review of this Agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this Agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

The Census Bureau will promptly consider and participate in adjudication of, in accordance with Federal law, claims which may arise for damages of any nature arising out of a Census Bureau act under this Agreement. Such adjudication will be pursued under the Federal Tort Claims Act, 28 U.S.C. Section 2671 et seq., the Federal Employees Compensation Act, 5 U.S.C. Section 8101 et seq., or such other legal authority as may be pertinent.

7. CONFIDENTIALITY

A. IT Security

The UMVRDA protects the confidentiality of the state data.

The Census Bureau will comply with all federal laws applicable to the privacy or security of data received pursuant to this Agreement. As a federal agency, the Census Bureau is not subject to state laws, however the Census Bureau will comply with the requirements of applicable state laws, including the UMVRDA, to the extent that they do not conflict with the Census Bureau's requirements under federal law.

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, United States Code. The data provided under this Agreement are confidential under 13, U.S.C. § 9. Per the Federal Cybersecurity Enhancement Act of 2015, these data are also protected from cybersecurity risks through screening of the systems that transmit the data. Upon receipt, all data acquired as a result of this Agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with the Federal Information Security Modernization Act of 2014, Public Law 113-283. All systems are fully assessed against NIST Special Publication 800-53r4 *"Recommended Security Controls for Federal Information Systems and Organizations,"* as well as Special Publication 800-37r2 *"Risk Management Framework for Information Systems and Organizations: A System Life Cycle Approach for Security and Privacy."* The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO (Chief Information Officer), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 *"Standards for Security Categorization of Federal Information and Information Systems"* and NIST Special Publication 800-60r1 *"Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices."* Security controls and subsequent assessments are to be completed based on the final categorization.

Cloud providers must be approved for at least moderate level information through the GSA FedRAMP process prior to acquiring any services. Census Bureau identifies, assesses and authorizes use based on the published FedRAMP results and an assessment of any Census Bureau (customer provided) controls implemented to protect the infrastructure and data. Security reporting on cloud providers is reported to the Department of Commerce on a regular basis under FISMA.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum M-17-12. Known or suspected losses of protected data are to be reported within one (1) hour of its

discovery to the Bureau of the Census Computer Incident Response Team (BOC CIRT) who will report as required to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau becomes aware of a known breach of the State Data, the Census Bureau will contact the state program agency contacts to discuss the actions and potential remedies regarding the incident.

B. Disclosure Avoidance Review of Statistical Products

Title 13, Section 9 of the United States Code (U.S.C.) requires the Census Bureau to keep confidential the information collected from the public under the authority of Title 13. Section 214 of Title 13, U.S.C., and Sections 3551, 3559 and 3571 of Title 18, U.S.C., provide for the imposition of penalties of up to five years in prison and/or up to \$250,000.00 in fines for wrongful disclosure of confidential census information.

Disclosure avoidance is the process for protecting the confidentiality of data, as required under Title 13 U.S.C. A disclosure of data occurs when someone can use published statistical information to identify an individual who has provided confidential information. For data tabulations, the Census Bureau uses disclosure avoidance procedures to modify or remove the characteristics that put confidential information at risk for disclosure. Although a published table may appear to show information about a specific individual, the Census Bureau has taken steps to disguise or suppress the original data, while making sure the results are still useful. The techniques used by the Census Bureau to protect confidentiality in tabulations vary, depending on the type of data.

Noise Injection is the Census Bureau's preferred disclosure avoidance technique. By policy, noise injection is applied to all data products that are reported with geographies smaller than a state. In cases when it is not feasible to fully implement noise injection within the period of the contract, a transition plan for implementing noise injection or other provable privacy methods must be developed in coordination with the Census Bureau. Noise injection may be required for microdata releases, depending on the characteristics of the microdata and the specific variables that are to be released. Data that cannot be publicly released may still be analyzed within the Federal Statistical Research Data Centers (FSRDCs) by individuals who have Special Sworn Status (SSS); the results of such analyses must still go through a disclosure avoidance process prior to being publicly released.

The parties understand that Title 13 confidentiality protection and disclosure avoidance techniques apply to all work described in this Agreement. The disclosure avoidance disclosure methods are defined by the Census Bureau, which has the responsibility of carrying out that work. Accordingly, upon completion of the tabulation, the data produced must be reviewed by the Census Bureau to ensure that no identifiable Title 13 data are or may be disclosed. Should the Census Bureau's Disclosure Review Board (DRB) determine that the requested statistical product does or reasonably could result in such disclosure, then the data product will be modified prior to approval for release to the party(ies) of this Agreement. The DRB must approve before a research product can be released to an individual who does not have SSS and a need to know, or moved to a computer not approved for controlled data according to Census' existing policies and procedures.

8. APPROVALS

Kevin Deardorff
Chief, Economic Reimbursable Surveys Division
U.S. Census Bureau

(Date)

Rhonda K. Lahm
Director
Nebraska Department of Motor Vehicles

(Date)

Attachment A: Data Elements

1. Data Requirements

Monthly data from the administration of Drivers Licensing and Identification Card Issuance for December 2019 – December 2021, will include, when available:

- a. Driver License Number or Identification Number
- b. Type of card
- c. Name
- d. Address
- e. Date of Birth
- f. Sex
- g. Race
- h. Eye Color
- i. Citizenship status
- j. Date Issued

Attachment B: Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records

The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of state programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

3. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to

pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

- A. validating and enhancing the Master Address File (MAF);¹
- B. designing and assigning resources to carry out the 2020 Census;²
- C. unduplicating public, private, and census lists; and
- D. Imputing missing data.³

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

4. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

¹ Examples of possible Census Bureau uses include updating and evaluating the Master Address File.

² Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.

³ Examples of possible Census Bureau uses include Item Imputation and count imputation using information from a composite of public and private data sources.

5. Project to Use Administrative Records Data to Support Executive Order 13880

The Census Bureau plans to use several administrative data sources of citizenship status in a statistical model that will produce a probability of being a U.S. citizen on April 1, 2020 for each person in the 2020 Census. The citizenship probability will be used together with age, race, ethnicity, and location information from the 2020 Census to produce Citizen Voting Age Population (CVAP) statistics. The objective of the project is to determine the number of citizens and non-citizens in the country.

Person records in each administrative and survey data source, including the 2020 Census, will be validated and assigned a unique person identifier, called a Protected Identification Key (PIK). The PIKs will be used to link each person's citizenship information to their 2020 Census record. The citizenship probability for persons in the 2020 Census without PIKs will be estimated based on local area information and the person's demographic characteristics, but not the person's citizenship, which makes the estimate much less accurate than if the person's citizenship information were available. The validation process (called the Person Identification Validation System (PVS)) involves comparing records to high-quality federal government sources (called reference files) using fields such as Social Security Number (SSN), name, date of birth, sex, and residential address. Currently the reference files are limited to the Social Security Administration's (SSA's) Numident file and the Internal Revenue Service's (IRS's) Individual Taxpayer Identification Number (ITIN) file. Several million U.S. residents have neither an SSN nor an ITIN, however. Thus, even if such a person's information in an administrative or survey source is accurate, it will not be found in the reference files, no PIK will be assigned, and the person's citizenship probability will be estimated without the benefit of information about her/his citizenship status. Just because a person doesn't have a PIK does not necessarily mean the person doesn't have an SSN or ITIN, however. Records often contain errors in personally identifiable information (PII), missing information, or variants not seen in the reference files (e.g., a name or address change), leading to a failure to validate. Thus, imposing an assumption that all persons without PIKs are not U.S. citizens would lead to a significant underestimate of the number of citizens.

Once citizenship data sources and the 2020 Census person file have been assigned PIKs, the citizenship data will be linked to the 2020 Census person file. A model will be estimated for each person with a PIK, using the most current citizenship status from each available citizenship source for the person, as well as the person's other demographic, household, and location information as explanatory variables. The model will produce a citizenship probability for each person, which will then be combined with age, race, ethnicity, and location information from the 2020 Census to produce the Citizen Voting Age Population (CVAP) statistics.

Having more than one source of citizenship information is necessary, because no one source is complete and up-to-date. The SSA Numident contains citizenship status for most of the population. But the information is not always up-to-date for foreign-born persons. Prior to the 1970's people were not required to provide evidence of citizenship status when applying for an SSN. Thus, the citizenship status is blank for many older people in the Numident. Also, naturalized citizens are not required to notify SSA about their

naturalization. Thus, a naturalized citizen's SSA record may incorrectly say the person is not a citizen.

Having information about not only whether a person is a U.S. citizen or not at a point in time, but also their country of origin, visa status, and how long they have been in that status, could help predict naturalization at a later date, because naturalization rates vary across countries of origin, visa statuses, and lengths of time in status. This would be useful for estimating the current citizenship status for persons with citizenship information sometime in the past, but who lack current information.

Prior to producing citizenship statistics in the fall/winter of 2020-2021, the Census Bureau will do extensive testing of the citizenship models. Researchers will use past censuses and the American Community Survey (ACS) as person frames (in place of the 2020 Census), together with citizenship information from administrative sources in the same time periods. The testing will require historical data.

The administrative records data will both expand the coverage of persons with citizenship information in the 2020 Census and provide more up-to-date citizenship information for those already covered by other sources, resulting in more accurate statistics about the U.S. citizen population.

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE MISSISSIPPI DEPARTMENT OF HUMAN SERVICES

Agreement No. 0094-2017-PAY-001

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Mississippi Department of Human Services for the acquisition of Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF) data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the Mississippi Department of Human Services to share SNAP data and enter into this agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026. The Food and Nutrition Act of 2008 limits the use of SNAP recipient information to those directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the SNAP program because Census will provide to the state copies of its tabulations of the data for the state to use in administering its SNAP program.

The authority for the Mississippi Department of Human Services to share TANF data and enter into this agreement is the Public Health and Welfare Act, 42 U.S.C. § 613.

3. TERMS AND CONDITIONS

Pursuant to this agreement, the Mississippi Department of Human Services, hereinafter referred to as "the state program agency" shall transfer records to the Census Bureau from the administration of SNAP and TANF, hereinafter referred to as "the state data" and as described in Attachment A of this agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and Special Sworn Status ("SSS") researchers will have access to the data. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases

information related to this research, it may not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

- i. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of SNAP and administration of TANF for the years 2010—2021, as described in Attachment A.
- ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, record length and data dictionary.
- iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers may not contain any state data or direct identifiers.
- iv. To allow the Census Bureau staff and SSS researchers to use the state data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

- i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.
- ii. To provide the state program agency a table package based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American Community Survey (ACS). A table package shall include estimated rates of program eligibility and access/participation for the state overall and by various demographic, economic, and household characteristics and by county when the data allow. It also will include distributions across the same characteristics both for program participants and for those who are estimated to be eligible but do not participate. The table package will be delivered either within six (6) months from the date that the state administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.
- iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of

any report or other document containing information derived from the state data pertaining to SNAP and TANF and resulting from use under this agreement of the state data. If no comments are received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this agreement.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the agreement to prevent unauthorized use.

Processing Sites: Bowie Computer Center
 Suitland Federal Center
 Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency POC:

Cathy Sykes
Deputy Administrator, Programs
Mississippi Department of Human Services
750 N State St
Jackson, MS 39202
601-359-4888
cathy.sykes@mdhs.ms.gov

Census Bureau POC:

Dr. Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. FUNDING

The total amount to be paid by the Census Bureau to the state program agency via Electronic Funds Transfer (EFT) is \$20,000. Funding is provided to reimburse the state program agency for resources needed to set up and complete the data extraction as described in Attachment C. This Agreement is considered to be a firm commitment. If this agreement is terminated on behalf of the state program agency prior to the completion of the data being transferred to the Census Bureau, the state program agency will return the funds within sixty (60) days of termination.

6. ACCOUNTING DATA

State Agency Accounting Data:

Appropriation No.:

CAN:

DUNS No.: **809399918**

EIN: **64-6000807**

Total Amount:

Control Number:

Census Bureau Accounting Data:

Agency Location Code: **13-04-0001**

Project Code: **0331000**

Division Code: **0094**

Object Class Code: **25-30-07-00**

TAS: **013 X 4512 000**

Business Event Type Code (BETC): **DISB**

Funds Expiration: **No Year**

Funds Cancellation Date: **No Year**

Organization Code: **11-09-0094-00-00-00-00**

DUNS No.: **929955383**

EIN: **52-0204537**

Total Amount: **\$20,000.00**

Agreement No.: **0094-2017-PAY-001**

7. FINANCIAL POINTS OF CONTACT

State Agency Financial Contact:

Chris Christmas
Director of Budgets and Accounting
Mississippi Department of Human Services
750 N State St
Jackson, MS 39202
601-359-4665

Census Bureau Financial Contact: Darrell Blyden
Chief, Financial Services Center
Finance Division
U.S. Census Bureau
4600 Silver Hill Road
Washington, DC 20233
(301) 763-4390
Darrell.b.blyden@census.gov

8. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement shall terminate six (6) years following the date on which it becomes effective. If, at the end of six (6) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, in order to determine whether it should be revised, renewed or canceled. The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Notwithstanding all other provisions of this agreement, the Parties agree that:

- a. This agreement may be amended at any time by written mutual consent of both parties.
- b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

The original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3. Terms and Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

9. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within

thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

10. CONFIDENTIALITY

Mississippi law protects the confidentiality of the state data, as well as:

- Medicaid, 42 U.S.C. § 1396(a)(a)(7), 42 CFR Part 431.300-307;
- Temporary Assistance to Needy Families, 42 U.S.C. § 602 (a)(1)(A)(iv);
- Supplemental Nutrition Assistance Program, 7 U.S.C. § 2020 (e)(8);
- 7 CFR Part 272.1(c);
- Social Security Act, 42 U.S.C. § 1396(a)(a)(7);
- Social Security Administration Disclosure, 20 CFR Part 401;
- Child Support, 42 U.S.C. § 654(26);
- Public Assistance Programs (Public Welfare), 45 CFR Part 205.50; and
- U.S. Department of Labor Employment and Training Administration, 20 CFR Part 603.

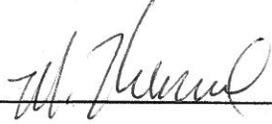
The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the Chief Information Officer ("CIO"), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*." Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team ("US CERT"). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

11. APPROVALS



11/30/2016
Michael Thieme (Date)
Acting Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

DocuSigned by:


12/1/2016
AEDBFDD02F7A44A...
Garrig Shields (Date)
Deputy Executive Director
Mississippi Department of Human Services

Attachment A: Data Elements

1. Data Requirements

Monthly data from the administration of SNAP and TANF for the years 2010–2021 will include, when available:

- a. Case unit identifiers,
- b. Current monthly case unit address (residence, mailing),
- c. Benefit amounts received (monthly),
- d. Income reporting requirement (simplified reporting, change reporting, etc.),
- e. Gross income (monthly),
- f. Net income (monthly),
- g. Eligibility and denial information,
- h. Identifiers for individuals in case units, and
- i. The following information on individuals in a case unit:
 - i. Name
 - ii. Social Security Number
 - iii. Case unit/main contact phone number
 - iv. Relationship to primary recipient
 - v. Race
 - vi. Hispanic origin/Ethnicity
 - vii. Sex
 - viii. Date of birth
 - ix. Education
 - x. Employment
 - xi. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)

Attachment B: Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records

The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of state programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing likely eligible non-participants of SNAP

Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to

each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

- A. validating and enhancing the Master Address File (MAF);¹
- B. designing and assigning resources to carry out the 2020 Census;²
- C. unduplicating public, private, and census lists; and
- D. imputing missing data.³

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American

¹ Examples of possible Census Bureau uses include updating and evaluating the Master Address File.

² Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.

³ Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

Attachment C: Statement of Work SNAP and TANF Data Extraction

**Statement of Work
for the
U.S. Census Bureau Funding of the Data Extraction by the
Mississippi Department of Human Services for
SNAP and TANF Administrative Data**

Under the referenced MOU [0094-2017-PAY-001] through which the Census Bureau is acquiring SNAP and TANF Administrative Data from the Mississippi Department of Human Services, Census Bureau funding reimburses the Mississippi Department of Human Services for its efforts to extract SNAP and TANF data for the years CY2010-CY2021, by providing funds to complete the following tasks:

Task 1 – Analysis, Design, and Initial File Delivery

Through this task, the Mississippi Department of Human Services has agreed to provide SNAP and TANF recipient data to the US Census Bureau. While there is no charge for the data, a considerable amount of design, programming, and testing work is needed to extract the data elements needed by the Census Bureau and create a series of "flat files" for transmission to the Census Bureau. We will extract SNAP and TANF case and client details for CY2010 through CY2021, create a series of files, review the files for accuracy, and provide them to the Census Bureau, along with a data dictionary and record layout, or other similar documentation. This task is expected to be completed by March 31, 2022, with delivery of all CY2010-CY2021 files.

Task 2 – Delivery of CY2010-CY2016 Data

Through this task, the CY2010-CY2016 data can be provided after CY2016 is complete. This is expected to be completed by June 30, 2017.

Task 3 – Delivery of CY2017 Data

Through this task, the CY2017 data can be provided after CY2017 is complete. This is expected to be completed by March 31, 2018.

Task 4 – Delivery of CY2018 Data

Through this task, the CY2018 data can be provided after CY2018 is complete. This is expected to be completed by March 31, 2019.

Task 5 – Delivery of CY2019 Data

Through this task, the CY2019 data can be provided after CY2019 is complete. This is expected to be completed by March 31, 2020.

Task 6 – Delivery of CY2020 Data

Through this task, the CY2020 data can be provided after CY2020 is complete. This is expected to be completed by March 31, 2021.

Task 4 – Delivery of CY2021 Data

Through this task, the CY2021 data can be provided after CY2021 is complete. This is expected to be completed by March 31, 2022.

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE MONTANA DEPARTMENT OF PUBLIC HEALTH & HUMAN SERVICES

Agreement No. [2064-FY18-NFE-0134]

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Montana Department of Public Health and Human Services (DPHHS) for the acquisition of Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF) data.

2. AUTHORITY

The authority for the Census Bureau to enter into this Agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the DPHHS to share SNAP data and enter into this Agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026. The Food and Nutrition Act of 2008 limits the use of SNAP recipient information to those directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on October 24, 2017, has determined that the Census Bureau is directly connected with the administration of the SNAP program because Census will provide to the state copies of its research tabulations for the state to use in administering its SNAP program.

The authority for the DPHHS to share TANF data and enter into this Agreement is consistent with Section 1137 of the Social Security Act and Section 205.50 of Title 45, Code of Federal Regulations.

Additional authority for the DPHHS to enter into this Agreement is Section 53-2-211(4), Montana Code Annotated, and Rule 37.78.106(2)(d), Administrative Rules of Montana.

3. TERMS AND CONDITIONS

Pursuant to this Agreement, the DPHHS, hereinafter referred to as "the state program agency" shall transfer records to the Census Bureau from the administration of SNAP and TANF, hereinafter referred to as "the state data" and as described in Attachment A of this Agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and those Special Sworn Status (SSS) researchers participating in the projects will have access to the data. Access shall be limited to the minimum number of individuals necessary. Any data, records, or other information shared through this research Agreement are protected from unauthorized disclosure and shall be

used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it may not be disclosed in individually-identifiable form that permits the identification of any individual respondents, businesses, organizations, or institutions, and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. To the extent provided by law, the Census Bureau will recognize the state program agency as the owner of the original data in the form that it is delivered to the Census Bureau, prior to its integration with confidential Census data. As owner of the original form of data only, the state program agency acknowledges that it has no ownership or control over the access, use or disclosure of confidential Census data, including the linked files containing both the original data and confidential Census data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

- i. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of SNAP and administration of TANF for the years 2012—2024, as described in Attachment A.
- ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this Agreement; including definitions of active participants, a record layout, record count, record length and data dictionary.
- iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers may not contain any state data or direct identifiers.
- iv. To allow the Census Bureau staff and SSS researchers to use the state data at the Processing Sites listed in Section 4 of this Agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this Agreement.

b. The Census Bureau agrees:

- i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this Agreement and only for the projects listed in Attachment B or those approved in writing by both parties.
- ii. To provide the state program agency with a copy of data tabulations that the Census Bureau will create for Census research purposes. Specifically, the Census Bureau will provide the state program agency with data tabulations based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American Community Survey (ACS). Data tabulations shall include estimated rates of program eligibility and access/participation for the state overall and by various demographic, economic, and household characteristics and by county when the data allow. It also will include

Economic Reimbursable Surveys Division
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-2028
michael.a.berning@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This Agreement is effective on the date on which it is signed by both parties. The Agreement shall terminate six (6) years following the date on which it becomes effective. If, at the end of six (6) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this Agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the Agreement, in order to determine whether it should be revised, renewed or canceled. The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Notwithstanding all other provisions of this Agreement, the Parties agree that:

- a. This Agreement may be amended at any time by written mutual consent of both parties.
- b. Either party may terminate this Agreement upon thirty (30) days written notice to the other party.

To the extent permitted by federal law, the original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3, Terms and Conditions. Any revisions to the data retention timetable after the execution of this Agreement will be stated in writing in an amendment to this Agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this Agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this Agreement.

To promote organizational transparency, and in support of data discovery for current and future research projects, the U.S. Census Bureau posts non-sensitive data documentation to public-facing websites. This documentation, such as a record layout or data dictionary, can include file descriptions, variable lists, variable labels and valid values for each variable.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this Agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5 U.S.C. App. 3, a review of this Agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this Agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

The Census Bureau will promptly consider and adjudicate, in accordance with Federal law, claims which may arise for damages of any nature arising out of a Census Bureau act under this Agreement. Such adjudication will be pursued under the Federal Tort Claims Act, 28 U.S.C. Section 2671 et seq., the Federal Employees Compensation Act, 5 U.S.C. Section 8101 et seq., or such other legal authority as may be pertinent. The U.S. Department of Justice shall determine the appropriate venues for any litigation arising under this Agreement.

7. CONFIDENTIALITY

A. IT Security

Sections 53-2-105 and 53-2-106, Montana Code Annotated, and Rule 37.78.106(1), Administrative Rules of Montana, protect the confidentiality of the state data, as well as:

- Medicaid, 42 U.S.C. § 1396(a)(a)(7), 42 CFR Part 431.300-307;
- Temporary Assistance to Needy Families, 42 U.S.C. § 602 (a)(1)(A)(iv);
- Supplemental Nutrition Assistance Program, 7 U.S.C. § 2020 (e)(8);
- 7 CFR Part 272.1(c);
- Social Security Act, 42 U.S.C. § 1396(a)(a)(7);
- Social Security Administration Disclosure, 20 CFR Part 401;
- Child Support, 42 U.S.C. § 654(26);
- Public Assistance Programs (Public Welfare), 45 CFR Part 205.50; and
- U.S. Department of Labor Employment and Training Administration, 20 CFR Part 603.

The Census Bureau will comply with all federal laws applicable to the privacy or security of data received pursuant to this Agreement. As a federal agency, the Census Bureau is not subject to state laws, however the Census Bureau will comply with the requirements of applicable state laws to the extent that they do not conflict with the Census Bureau's requirements under federal law.

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13,

United States Code. The data provided under this Agreement are confidential under 13, U.S.C. § 9. Per the Federal Cybersecurity Enhancement Act of 2015, these data are also protected from cybersecurity risks through screening of the systems that transmit the data. Upon receipt, all data acquired as a result of this Agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the Chief Information Officer (CIO), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*." Security controls and subsequent assessments are to be completed based on the final categorization.

Cloud providers must be approved for at least moderate level information through the GSA FedRAMP process prior to acquiring any services. Census Bureau identifies, assesses and authorizes use based on the published FedRAMP results and an assessment of any Census Bureau (customer provided) controls implemented to protect the infrastructure and data. Security reporting on cloud providers is reported to the Department of Commerce on a regular basis under FISMA.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum M-17-12. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau becomes aware of a known breach of the State Data, the Census Bureau will contact the state program agency contacts to discuss the actions and potential remedies regarding the incident.

B. Disclosure Avoidance Review of Statistical Products

Title 13, Section 9 of the United States Code (U.S.C.) requires the Census Bureau to keep confidential the information collected from the public under the authority of Title 13. Section 214 of Title 13, U.S.C., and Sections 3551, 3559 and 3571 of Title 18, U.S.C., provide for the imposition of penalties of up to five years in prison and/or up to \$250,000.00 in fines for wrongful disclosure of confidential census information.

Disclosure avoidance is the process for protecting the confidentiality of data, as required under Title 13 U.S.C. A disclosure of data occurs when someone can use published statistical information to identify an individual who has provided confidential information under a pledge of confidentiality. For data tabulations, the Census Bureau uses disclosure avoidance procedures to modify or remove the characteristics that put confidential information at risk for disclosure. Although a published table may appear to show information about a specific individual, the Census Bureau has taken steps to disguise or suppress the original data, while making sure the results are still useful. The techniques used by the Census Bureau to protect confidentiality in tabulations vary, depending on the type of data.

The parties understand that Title 13 confidentiality protection and disclosure avoidance techniques apply to all work described in this Agreement. The disclosure avoidance disclosure methods are defined by the Census Bureau which has the responsibility of carrying out that work. Accordingly, upon completion of the tabulation, the data produced must be reviewed by the Census Bureau to ensure that no identifiable Title 13 data are or may be disclosed. Should the Census Bureau's Disclosure Review Board (DRB) determine that the requested statistical product does or reasonably could result in such disclosure, then the data product will be modified prior to approval for release to the party(ies) to this Agreement. The DRB must approve before a research product can be released to an individual who does not have SSS and a need to know, or moved to a computer not approved for controlled data according to Census' existing policies and procedures.

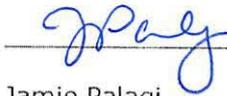
8. APPROVALS



3-6-2018

Nick Orsini
Assistant Director, Economic Programs
U.S. Census Bureau

(Date)



4-9-18

Jamie Palagi
Administrator
Human and Community Services Division

(Date)

Attachment A: Data Elements

1. Data Requirements

Monthly data from the administration of SNAP and TANF for the years 2012–2024 will include, when available:

- a. Case unit identifiers,
- b. Active Participant definitions,
- c. Complete monthly case unit address history (residence, mailing),
- d. Benefit amounts received (monthly),
- e. Income reporting requirement (simplified reporting, change reporting, etc.),
- f. Gross income (monthly),
- g. Net income (monthly),
- h. Eligibility and denial information,
- i. Identifiers for individuals in case units, and
- j. The following information on individuals in a case unit:
 - i. Name
 - ii. Social Security Number
 - iii. Case unit/main contact phone number
 - iv. Relationship to primary recipient
 - v. Race
 - vi. Hispanic origin/Ethnicity
 - vii. Sex
 - viii. Date of birth
 - ix. Education
 - x. Employment
 - xi. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)

Attachment B: Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records

The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of state programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing likely eligible non-participants of SNAP

Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to

each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

- A. validating and enhancing the Master Address File (MAF);¹
- B. designing and assigning resources to carry out the 2020 Census;²
- C. unduplicating public, private, and census lists; and
- D. imputing missing data.³

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American

1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.

2 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.

3 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

**MEMORANDUM OF AGREEMENT
ESTABLISHING A JOINT PROJECT BETWEEN
THE U.S. CENSUS BUREAU
AND
THE OREGON PUBLIC HEALTH DIVISION, OREGON WIC PROGRAM
0094-FY17-NFE-0091**

1. PARTIES AND PURPOSE

Under this Memorandum of Agreement (MOA), the Census Bureau will provide Oregon Public Health Division, Oregon WIC Program (Oregon WIC), with information on the feasibility of conducting statistical analyses of WIC administrative records data linked to other sources of data at the Census Bureau, including but not limited to surveys, decennial censuses, and other administrative records sources. The linked data may be used to research the demographic and economic characteristics of persons in the files and relationships between participation in WIC and income, employment, housing, health, incarceration, and participation in other public assistance programs.

2. LEGAL AUTHORITY

- A. The Census Bureau is authorized to enter into this agreement pursuant to 13 U.S.C., Section 8(b), which allows the Census Bureau to engage in joint statistical projects with Federal and State Agencies on matters of mutual interest, upon equitable apportionment of costs. Additional authority is provided by 13 U.S.C., Section 6 which allows the Census Bureau to obtain information pertinent to the Census Bureau's Title 13 U.S.C. work from Federal and State Agencies.
- B. The Oregon WIC is authorized to enter into this agreement pursuant to Oregon Revised Statutes 411.116.

3. PURPOSE

Pursuant to this agreement, the Census Bureau will explore the completeness and quality of identification variables in the Oregon WIC data. The Census Bureau will also explore the feasibility of linking administrative data obtained through the Oregon WIC with other records at the Census Bureau, including, but not limited to, the American Community Survey (ACS), Current Population Survey (CPS), Master Address File (MAF), Census of Population and Housing, and Longitudinal Employer Household Dynamics (LEHD) database. The Census Bureau will also link the data disclosed through Oregon WIC to administrative records from public and private sources. The Census Bureau has determined that this project cannot be done as effectively without the participation of the Oregon WIC.

4. MUTUAL INTEREST OF THE PARTIES

The Census Bureau benefits in that it will use these linked data to improve the quality of the demographic and economic censuses and surveys that it conducts. The data contained in the linked files are to be used for statistical research described in Attachment A. New projects may be initiated in writing to Oregon WIC and the Census Bureau Data Custodian for review and written approval by both agencies throughout the term of this MOA. New projects must include a description of the project and Title 13 benefits to the Census Bureau. All new projects and any modifications, expansions, or enhancements to existing projects that are approved will be subject to all of the terms and conditions of this MOA.

Oregon WIC will benefit from the joint research linking WIC administrative data to various data sources that the Census Bureau maintains to study outcomes such as income, employment, housing, health insurance usage, and program participation. The linked data will be used to evaluate the quality of key variables in the WIC data and coverage of persons in the data by demographic and socioeconomic characteristics.

5. RESPONSIBILITIES OF THE PARTIES

The Census Bureau will perform the work as described below:

A. Acquire data from Oregon WIC

1. The Census Bureau will obtain, process, and maintain data disclosed by Oregon WIC at the Census Bureau in accordance with COMMERCE/Census-8, Statistical Administrative Records System.
2. The Census Bureau will protect all data, records, data elements, and any other information collected, gathered, obtained, or otherwise received by the Census Bureau under this agreement from unauthorized disclosure. All information regarding corrections data is confidential, and the Census Bureau shall follow the appropriate requirements to maintain the confidentiality of information concerning BJS persons and facilities. Any violations of this provision or the provisions of the federal statutes listed above shall be considered cause for immediate termination of this agreement.
3. The Census Bureau will ensure that data acquired under this agreement may be accessed in the Census Bureau's Research Data Center (RDC) Network under the approved projects as described in Attachment A and those that meet all review criteria and are approved by Oregon WIC and the Census Bureau using the Census Bureau's standard data protection processes. Access to the anonymized analytical data files created through this agreement shall be limited to the minimum number of individuals necessary and will include Title 13, U.S.C., Section 23 (c) Special Sworn Status (SSS) researchers participating in the project at the Census Bureau.

- B. Validate person records
 - 1. A unique Protected Identification Key (PIK) will be assigned to records to allow linkage between Oregon WIC files, Census Bureau data, and other administrative records data.
 - 2. Tabulations will be created that provide information about the socio-economic characteristics of validated and non-validated records.
- C. Validate address records
 - 1. A unique unit-level address (MAFID) will be assigned to records to allow linkage between Oregon WIC files, Census Bureau data, and other administrative records data.
 - 2. Tabulations will be created that provide information about the structures and areas of MAF-matched and non-MAF-matched addresses.
- D. Produce statistical outputs per Oregon WIC specifications
 - 1. A set of tabulations designed to inform the Census Bureau and Oregon WIC about the quality of linkage with other sources of data and characteristics about Oregon WIC program participants.
 - 2. In order to produce these tabulations, it may be necessary to adjust the survey weights Census Bureau data to account for biases resulting from issues including un-validated records and other data anomalies. Reweighting procedures will be designed and implemented to account for unmatched persons or units.

The Oregon WIC agrees to perform the following activities and provide the following resources:

- 1. The Oregon WIC will prepare and transfer WIC participants' data to the Census Bureau, via Secure FTP. A transfer of data for 2008 thru the most recent completed calendar year will be delivered initially. Additional years of data thru 2020 will be transferred when they are available.
- 2. The Oregon WIC will provide records count, layouts, and data dictionaries for WIC participants data that will be transferred for the initial delivery and subsequent years of data delivery (Attachment B).
- 3. The Oregon WIC program will provide analytic support to the Census Bureau in the interpretation of data linkage results.

6. EQUITABLE APPORTIONMENT OF COSTS

The costs associated with this MOA are equitably apportioned. The Census Bureau will provide 1.25 FTE to enhance matching algorithms, develop metadata and match the WIC data to existing data assets.

Oregon WIC will provide 1.0 FTE with Special Sworn Status (SSS) for research support on the WIC data and linked survey-administrative data.

7. CONFIDENTIALITY

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence and to use the data for statistical purposes only in accordance with the provisions of Title 13, United States Code. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with the National Institute of Standards and Technology (NIST) Federal Information Processing Standards (FIPS) 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 *“Recommended Security Controls for Federal Information Systems and Organizations,”* as well as Special Publication 800-37r1 *“Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach.”* The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO as well as the Department of Commerce Office of Inspector General as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 *“Standards for Security Categorization of Federal Information and Information Systems”* and NIST Special Publication 800-60r1 *“Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices.”* Security controls and subsequent assessments are done based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are reported within one hour to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau becomes aware of a known breach of the Oregon WIC data, the Census Bureau will contact the identified WIC contacts to discuss the actions and potential remedies in regards to the incident.

8. CONTACTS

The primary contacts of each party to this agreement are:

Census Bureau Points of Contact:

Michael Berning
Center for Administrative Records Research and Applications

U.S. Census Bureau
Phone: (301) 763-2028
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Sonya Porter
Center for Administrative Records Research and Applications
U.S. Census Bureau
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Oregon WIC Points of Contact:

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Center for Prevention and Health Promotion
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Julie A. Reeder, PhD, MPH, CHES
Senior Research Analyst
Public Health, Oregon WIC Program
Phone: (971) 673-0051
Email: julie.a.reeder@state.or.us

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such a change.

9. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement will become effective when signed by all parties. The agreement will terminate 5 years from the date signed, but may be amended at any time by mutual consent of the parties. The parties will review this agreement at least once every 3 years to determine whether it should be revised, renewed, or canceled. Any party may terminate this agreement by providing 30 days written notice to the other party.

Attachment A

U.S. Census Bureau Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records

The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of state programs in the American Community Survey (ACS), the Current Population Survey (CPS) and the Survey of Income and Program Participation (SIPP). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing WIC participants and likely eligible non-participants of WIC

WIC data linked to ACS data can provide characteristic information for women, infants, and children participating in the WIC program. Additionally, infants and children with a high probability of being eligible for WIC can be estimated using ACS information on family structure, reported income, and public assistance.¹ The estimated eligible infants and children can be matched to the administrative WIC data to determine who is estimated to be eligible but not participating in the program, helping agencies determine unmet need. The project results can help state agencies improve outreach efforts. This research helps the Census Bureau better understand their survey and census data.

3. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System (PVS) uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys,

¹ Eligible pregnant and breastfeeding women cannot be identified in ACS data.

Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

- A. validating and enhancing the Master Address File (MAF);²
- B. designing and assigning resources to carry out the 2020 Census;³
- C. unduplicating public, private, and census lists; and
- D. imputing missing data.⁴

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data.

Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American population and economy. As Census and other Federal Statistical Agencies successfully

² Examples of possible Census Bureau uses include updating and evaluating the Master Address File.

³ Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.

⁴ Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

Attachment B

Oregon WIC Core File Record Layout

Data elements needed to support approved projects shall include but not be limited to:

FIELD NAME	COMMENTS
CALENDAR_YEAR	YYYY
FAMILY_ID	Numeric, 4-7 digits no leading zeros
WIC_CATEGORY_CODE	<p>One of the following:</p> <p>C1 = Child 13-23 months</p> <p>C2-5 = Child 2-5 years</p> <p>IB1-3 = Partially breastfeeding infant 1-3 months</p> <p>IB4-6 = Partially breastfeeding infant 4-6 months</p> <p>IB7-12 = Partially breastfeeding infant 7-12 months</p> <p>IE0-3 = Exclusively breastfeeding infant 0-3 months</p> <p>IE4-6 = Exclusively breastfeeding infant 4-6 months</p> <p>IE7-12 = Exclusively breastfeeding infant 7-12 months</p> <p>INO-3 = Non breastfeeding infant 0-3 months</p> <p>IN4-6 = Non breastfeeding Infant 4-6 months</p> <p>IN7-12 = Non breastfeeding infant 7-12 months</p> <p>NB = Newborn, partially breastfeeding</p> <p>NE = Newborn, exclusively breastfeeding</p> <p>NN = Newborn, non breastfeeding</p> <p>WB = Woman, partially breastfeeding</p> <p>WE = Woman, exclusively breastfeeding</p> <p>WN = Woman, non breastfeeding</p> <p>WP = Woman, pregnant</p>
DATE_OF_BIRTH	MMDDYYYY
LAST_NAME	Text
FIRST_NAME	Text
MIDDLE_NAME	Text
PHONE_HOME	Text, format (3 area) 3 prefix-4 number
PHONE_CELL	Text, format (3 area) 3 prefix-4 number
FULL_STREET	Text
CITY	Text
STATE	Text
ZIP_CODE	Numeric, 5 digits
ZIP_PLUS_4	Numeric, 4 digits

Gender

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
WOMEN, INFANTS AND CHILDREN ADMINISTRATIVE DATA
FROM
THE COMMONWEALTH OF PENNSYLVANIA,
DEPARTMENT OF HEALTH, BUREAU OF WOMEN, INFANTS AND CHILDREN

Agreement No. 0094-FY16-NFE-0075

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Commonwealth of Pennsylvania, Department of Health, Bureau of Women, Infants and Children (PA WIC) for the acquisition of Women, Infants and Children (WIC) Administrative Data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for PA WIC to share WIC data and enter into this agreement is Section 17 of the Child Nutrition Act of 1966, 42 U.S.C. § 1786 and implementing regulations at 7 CFR Part 246. WIC regulations at 7 CFR 246.26(d)(1)(ii) limit the disclosure of WIC recipient information to those directly connected with the administration or enforcement of the WIC program. The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the WIC program because Census will provide to the state copies of its tabulations of the data for the state to use in administering its WIC program.

3. TERMS AND CONDITIONS

Pursuant to this agreement, the PA WIC, hereinafter referred to as "the state program agency", will transfer records to the Census Bureau from the administration of WIC, hereinafter referred to as "the state data" and as described in Attachment A of this agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and Special Sworn Status ("SSS") researchers will have access to the data. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it will not be

disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

- i. To transfer to the Census Bureau via secure FTP (File Transfer Protocol) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of WIC for the years 2004–2021, as described in Attachment A.
- ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, and record length.
- iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers will not contain any state data or direct identifiers.
- iv. To allow the Census Bureau staff and Special Sworn Status (SSS) researchers to use the state data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

- i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.
- ii. To provide the state program agency a table package based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American Community Survey (ACS). A table package shall include estimated rates of program eligibility and access/participation for the state overall and by various demographic, economic, and household characteristics and by county when the data allow. It also will include distributions across the same characteristics both for program participants and for those who are estimated to be eligible but do not participate. The table package will be delivered either within six (6) months from the date that the state administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.

- iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to WIC and resulting from use under this agreement of the state data. If no comments are received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this agreement.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the agreement to prevent unauthorized use.

Processing Sites: Bowie Computer Center
 Suitland Federal Center
 Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency POC:

William Cramer
Director of WIC
Bureau of Woman, Infants and Children
Pennsylvania Department of Health
625 Forster Street
7th Floor West Health and Welfare Building
Harrisburg, PA 17120
(717) 738- 1289
w.cramer@pa.gov

Census Bureau POC:

Dr. Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement will terminate five (5) years following the date on which it becomes effective. If, at the end of five (5) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties will review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, in order to determine whether it should be revised, renewed or canceled. The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Notwithstanding all other provisions of this agreement, the Parties agree that:

- a. This agreement may be amended at any time by written mutual consent of both parties.
- b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

The original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3. Terms and Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of

Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

7. CONFIDENTIALITY

Federal regulations governing WIC protect the confidentiality of data and participant information found at 7 CFR 246.26(e). The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO (Chief Information Officer), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*." Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

8. APPROVALS



9/30/14

Ron Jarmin
Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

(Date)



2/1/17

Lori Stubbs
Director, Bureau of Administrative & Financial Services
Pennsylvania Department of Health

(Date)

Attachment A: Data Elements

1. Data Requirements

Data from the administration of WIC for the years 2004—2021 will include, when available, but not limited to:

- a. Case unit identifiers,
- b. Complete monthly case unit address history (residence, mailing),
- c. Benefit amounts received (monthly),
- d. Income reporting requirement (simplified reporting, change reporting, etc.),
- e. Gross income (monthly),
- f. Net income (monthly),
- g. Eligibility and denial information,
- h. Identifiers for individuals in case units, and
- i. The following information on individuals in a case unit:
 - i. Name
 - ii. Case unit/main contact phone number
 - iii. Relationship to primary recipient
 - iv. Recipient or Caretaker phone number
 - v. Race
 - vi. Hispanic origin/Ethnicity
 - vii. Sex
 - viii. Date of birth
 - ix. Education
 - x. Employment
 - xi. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)

Attachment B: Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records

The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of state programs in the American Community Survey (ACS), the Current Population Survey (CPS) and the Survey of Income and Program Participation (SIPP). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing WIC participants and likely eligible non-participants of WIC

WIC data linked to ACS data can provide characteristic information for women, infants, and children participating in the WIC program. Additionally, infants and children with a high probability of being eligible for WIC can be estimated using ACS information on family structure, reported income, and public assistance.¹ The estimated eligible infants and children can be matched to the administrative WIC data to determine who is estimated to be eligible but not participating in the program, helping agencies determine unmet need. The project results can help state agencies improve outreach efforts. This research helps the Census Bureau better understand their survey and census data.

3. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System (PVS) uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would

¹ Eligible pregnant and breastfeeding women cannot be identified in ACS data.

have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

- A. validating and enhancing the Master Address File (MAF);²
- B. designing and assigning resources to carry out the 2020 Census;³
- C. unduplicating public, private, and census lists; and
- D. imputing missing data.⁴

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of

² Examples of possible Census Bureau uses include updating and evaluating the Master Address File.

³ Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.

⁴ Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE TENNESSEE DEPARTMENT OF HUMAN SERVICES

Agreement No. 0094-FY16-NFE-0039

1. PARTIES AND PURPOSE

This Memorandum of Understanding ("Memorandum") documents agreement between the U.S. Census Bureau (Census Bureau) and the Tennessee Department of Human Services (TDHS) for the acquisition of Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF) data.

2. AUTHORITY

The authority for the Census Bureau to enter into this Memorandum is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the TDHS to share SNAP data and enter into this Memorandum is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026. The Food and Nutrition Act of 2008 limits the use of SNAP recipient information to those directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the SNAP program because Census will provide to TDHS copies of its tabulations of the data for the state to use in administering its SNAP program.

The authority for the TDHS to share TANF data and enter into this Memorandum is the Public Health and Welfare Act, 42 U.S.C. § 613.

Additional authority for the TDHS to enter into this Memorandum is 7 CFR 272.1(c)(1)(i) and 45 CFR 205.50(a)(1)(i)(A).

3. TERMS AND CONDITIONS

Pursuant to this Memorandum, the TDHS, hereinafter referred to as "the state program agency" shall transfer data to the Census Bureau from the administration of SNAP and TANF, hereinafter referred to as "the state data" and as described in Attachment A of this Memorandum. All state data that the state program agency agrees to provide the Census Bureau shall remain confidential. To the extent provided by law, confidentiality of such data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act of 1974. To the extent provided by law, only Census Bureau staff and Special Sworn Status ("SSS") researchers will have access to the data. Any data, records, or other information shared through this research Memorandum are protected from unauthorized disclosure and shall be used solely for statistical purposes. When the Census Bureau publicly releases information related to this research, the Census Bureau shall ensure that it is not

disclosed in Individually-Identifiable form and comply with all Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

- i. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) or appropriately encrypted CD-ROM or DVD-ROM, the state data for the years 2004—2021, as described in Attachment A.
- ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this Memorandum; including a record layout, record count, record length and data dictionary.
- iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers may not contain any state data or direct identifiers.

Research projects exploring whether the administrative records represent the same individuals in survey or census households may need access to name data. Access to name data will only be granted through approval by the Census Bureau Data Stewardship Executive Policy Committee. Researchers may not have access to Social Security Numbers.

- iv. To allow the Census Bureau staff and SSS researchers to use the state data at the Processing Sites listed in Section 4 of this Memorandum for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this Memorandum.

b. The Census Bureau agrees:

- i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this Memorandum and only for the projects listed in Attachment B or those approved in writing by both parties.
- ii. To provide TDHS , within six (6) months of the time the state data is processed and provided to Census Bureau research staff, selected tabulations of the state SNAP and TANF data linked to the American Community Survey. SNAP profile tabulations shall describe the demographic and household characteristics of residents who are likely to be eligible for SNAP, but who do not participate in the program.
- iii. To the extent permitted by law, allow TDHS the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to SNAP and TANF and resulting from use under this Memorandum of the state data. If no

comments are received from TDHS within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to TDHS. If no comments are received within thirty (30) business days from delivery of the reminder notice, TDHS will be deemed to have approved the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this Memorandum.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the agreement to prevent unauthorized use.

Processing Sites: Bowie Computer Center
 Suitland Federal Center
 Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the Memorandum on behalf of the state program agency and the Census Bureau, respectively:

Tennessee Department of Human Services POC:
 Keisha Malone
 Interim Director of Operations, Family Assistance
 Citizen's Plaza
 400 Deaderick Street
 (615) 313-5292
 Keisha.malone@tn.gov

Census Bureau POC: Dr. Amy O'Hara
 Center Chief
 Center for Administrative Records Research and Applications
 U.S. Census Bureau
 4600 Silver Hill Rd
 Washington, DC 20233
 (301) 763-5757
 amy.b.ohara@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF MEMORANDUM, AMENDMENTS, AND MODIFICATIONS

This Memorandum is effective on the date on which it is signed by both parties. The Memorandum shall terminate five (5) years following the date on which it becomes

effective. If, at the end of five (5) years, the parties wish to continue the relationship, they must execute a new Memorandum.

The parties shall review this Memorandum at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the Memorandum, in order to determine whether it should be revised, renewed or canceled. The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Notwithstanding all other provisions of this Memorandum, the Parties agree that:

- a. This Memorandum may be amended at any time by written mutual consent of both parties.
- b. Either party may terminate this Memorandum upon thirty (30) days written notice to the other party.

The original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3. Terms and Conditions. Any revisions to the data retention timetable after the execution of this Memorandum will be stated in writing in an amendment to this Memorandum. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this Memorandum. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this Memorandum.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this Memorandum, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this Memorandum may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this Memorandum, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

7. CONFIDENTIALITY

State statutes protect the confidentiality of the state data, as well as:

- Medicaid, 42 U.S.C. § 1396(a)(a)(7), 42 CFR Part 431.300-307;
- Temporary Assistance to Needy Families, 42 U.S.C. § 602 (a)(1)(A)(iv);
- Supplemental Nutrition Assistance Program, 7 U.S.C. § 2020 (e)(8);
- 7 CFR Part 272.1(c);
- Social Security Act, 42 U.S.C. § 1396(a)(a)(7);
- Social Security Administration Disclosure, 20 CFR Part 401;
- Child Support, 42 U.S.C. § 654(26);
- Public Assistance Programs (Public Welfare), 45 CFR Part 205.50; and
- U.S. Department of Labor Employment and Training Administration, 20 CFR Part 603.

The Census Bureau assumes responsibility to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency Memorandum will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the Chief Information Officer ("CIO"), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*." Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team ("US CERT"). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

8. APPROVALS



2/25/14

Ron Jarmin
Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

(Date)



3/2/16

Charles Bryson
Assistant Commissioner
Tennessee Department of Human Services

(Date)

Attachment A: Data Elements

1. Data Requirements

Data from the administration of SNAP and TANF for the years 2004—2021 will include, when available:

- a. Case unit identifiers,
- b. Complete monthly case unit address history (residence, mailing),
- c. History of benefit amounts received (monthly),
- d. Income reporting requirement (simplified reporting, change reporting, etc.),
- e. Gross income (monthly),
- f. Net income (monthly),
- g. Eligibility and denial information,
- h. Identifiers for individuals in case units, and
- i. The following information on individuals in a case unit:
 - i. Name
 - ii. Social Security Number
 - iii. Contact phone number
 - iv. Relationship to primary recipient/caretaker
 - v. Race
 - vi. Hispanic origin/Ethnicity
 - vii. Sex
 - viii. Date of birth
 - ix. Education
 - x. Employment
 - xi. Earned income (employment, self-employment)
 - xii. Unearned income
 - xiii. Participation status

Attachment B: Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records

The U.S. Census Bureau administers multiple household surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of state programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing likely eligible non-participants of SNAP

Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to

each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

- A. validating and enhancing the Master Address File (MAF);¹
- B. designing and assigning resources to carry out the 2020 Census;²
- C. unduplicating public, private, and census lists; and
- D. imputing missing data.³

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.

2 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.

3 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
WOMEN, INFANTS, AND CHILDREN ADMINISTRATIVE DATA
FROM
THE UTAH WOMEN, INFANTS AND CHILDREN (WIC) PROGRAM

Agreement No. 0094-FY17-NFE-0080

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Utah WIC Program for the acquisition of Women, Infants, and Children (WIC) Administrative Data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the Utah WIC Program to share WIC data and enter into this agreement is Section 17 of the Child Nutrition Act of 1966, 42 U.S.C. § 1786 and implementing regulations at 7 CFR Part 246. WIC regulations at 7 CFR 246.26(d)(1)(ii) limit the disclosure of WIC recipient information to those directly connected with the administration or enforcement of the WIC program. The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the WIC program because Census will provide to the state copies of its tabulations of the data for the state to use in administering its WIC program.

Additional authority for the Utah WIC Program to enter into this agreement is the Utah Code Ann. 26-1-30.

3. TERMS AND CONDITIONS

Pursuant to this agreement, the Utah WIC Program, hereinafter referred to as "the state program agency", will transfer records to the Census Bureau from the administration of WIC, hereinafter referred to as "the state data" and as described in Attachment A of this agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and Special Sworn Status ("SSS") researchers will have access to the data. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it will not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey

data and administrative records data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

- i. To transfer to the Census Bureau via secure FTP (File Transfer Protocol) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of WIC for the years 2011–2021, as described in Attachment A.
- ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, and record length.
- iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers will not contain any state data or direct identifiers.
- iv. To allow the Census Bureau staff and Special Sworn Status (SSS) researchers to use the state data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

- i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.
- ii. To provide the state program agency a table package based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American Community Survey (ACS). A table package shall include estimated rates of program eligibility and access/participation for the state overall and by various demographic, economic, and household characteristics and by county when the data allow. It also will include distributions across the same characteristics both for program participants and for those who are estimated to be eligible but do not participate. The table package will be delivered either within six (6) months from the date that the state administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.
- iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to WIC and resulting from use under this agreement of the state data. If no comments are received from the state program agency within fourteen (14) days from delivery of pre-publication

documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this agreement.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the agreement to prevent unauthorized use.

Processing Sites: Bowie Computer Center
 Suitland Federal Center
 Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency POC:

Christopher D. Furner
Program Manager, Women, Infants and Children
Division of Family Health and Preparedness
3760 S. Highland Drive, Suite 512
Salt Lake City, UT 84106
801-273-2918
cfurner@utah.gov

Census Bureau POC:

Dr. Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement will terminate six (6) years following the date on which it becomes effective. If, at the end of six (6) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties will review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, in order to determine whether it should be revised, renewed or canceled. The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Notwithstanding all other provisions of this agreement, the Parties agree that:

- a. This agreement may be amended at any time by written mutual consent of both parties.
- b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

The original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3. Terms and Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

7. CONFIDENTIALITY

Utah Code Title 26 Chapter 3 and Chapter 25 protects the confidentiality of the state data, as well as WIC regulations at 7 CFR 246.26(e). The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data

acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

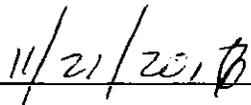
The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 *"Recommended Security Controls for Federal Information Systems and Organizations,"* as well as Special Publication 800-37r1 *"Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach."* The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO (Chief Information Officer), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 *"Standards for Security Categorization of Federal Information and Information Systems"* and NIST Special Publication 800-60r1 *"Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices."* Security controls and subsequent assessments are to be completed based on the final categorization.

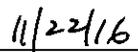
The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

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8. APPROVALS

Michael Thieme (Date)
Acting Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

Shari A. Watkins (Date)
Director, Office of Fiscal Operations
Utah Department of Health

Attachment A: Data Elements

1. Data Requirements

Monthly data from the administration of WIC for the years 2011–2021 will include, when available:

- a. Case unit identifiers,
- b. Complete monthly case unit address history (residence, mailing),
- c. Benefit received (monthly date or amount),
- d. Income reporting requirement (simplified reporting, change reporting, etc.),
- e. Gross Income (monthly),
- f. Net Income (monthly),
- g. Eligibility and denial information,
- h. Identifiers for individuals in case units, and
- i. The following information on individuals in a case unit:
 - i. Name
 - ii. Case unit/main contact phone number
 - iii. Relationship to primary recipient
 - iv. Recipient or caretaker phone number
 - v. Race
 - vi. Hispanic origin/Ethnicity
 - vii. Sex
 - viii. Date of birth
 - ix. Education
 - x. Employment
 - xi. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)

Attachment B: Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records

The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of state programs in the American Community Survey (ACS), the Current Population Survey (CPS) and the Survey of Income and Program Participation (SIPP). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing WIC participants and likely eligible non-participants of WIC

WIC data linked to ACS data can provide characteristic information for women, infants, and children participating in the WIC program. Additionally, infants and children with a high probability of being eligible for WIC can be estimated using ACS information on family structure, reported income, and public assistance.¹ The estimated eligible infants and children can be matched to the administrative WIC data to determine who is estimated to be eligible but not participating in the program, helping agencies determine unmet need. The project results can help state agencies improve outreach efforts. This research helps the Census Bureau better understand their survey and census data.

3. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System (PVS) uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would

¹ Eligible pregnant and breastfeeding women cannot be identified in ACS data.

have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

- A. validating and enhancing the Master Address File (MAF);²
- B. designing and assigning resources to carry out the 2020 Census;³
- C. unduplicating public, private, and census lists; and
- D. imputing missing data.⁴

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of

² Examples of possible Census Bureau uses include updating and evaluating the Master Address File.

³ Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.

⁴ Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE WYOMING DEPARTMENT OF FAMILY SERVICES

Agreement No. [2064-FY18-NFE-0133]

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Wyoming Department of Family Services (DFS) for the acquisition of Supplemental Nutrition Assistance Program (SNAP) data.

2. AUTHORITY

The authority for the Census Bureau to enter into this Agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the Wyoming Department of Family Services to share SNAP data and enter into this Agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026. The Food and Nutrition Act of 2008 limits the use of SNAP recipient information to those directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on October 24, 2017, has determined that the Census Bureau is directly connected with the administration of the SNAP program because the Census Bureau will provide to the state copies of its research tabulations for the state to use in administering its SNAP program.

Additional guidance for the Wyoming Department of Family Services to enter into this Agreement is the Memorandum of Record Regarding the Sharing of State SNAP Recipient Data with the U.S. Census Bureau dated October 24, 2017.

3. TERMS AND CONDITIONS

Pursuant to this Agreement, the Wyoming Department of Family Services, hereinafter referred to as "the state program agency" shall transfer records to the Census Bureau from the administration of SNAP, hereinafter referred to as "the state data" and as described in Attachment A of this Agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and those Special Sworn Status (SSS) researchers participating in the projects will have access to the data.

Access shall be limited to the minimum number of individuals necessary. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it may not be disclosed in individually-identifiable form that permits the identification of any individual respondents, businesses, organizations, or institutions, and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. To the extent provided by law, the Census Bureau will recognize the state program agency as the owner of the original data in the form that it is delivered to the Census Bureau, prior to its integration with confidential Census data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

A. The state program agency agrees:

- i. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of SNAP for the years 2004–2022, as described in Attachment A.
- ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this Agreement; including definitions of active participants, a record layout, record count, record length and data dictionary.
- iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers may not contain any state data or direct identifiers.
- iv. To allow the Census Bureau staff and SSS researchers to use the state data at the Processing Sites listed in Section 4 of this Agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this Agreement.

B. The Census Bureau agrees:

- i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this Agreement and only for the projects listed in Attachment B or those approved in writing by both parties.
- ii. To provide the state program agency with a copy of data tabulations that the Census Bureau will create for Census research purposes. Specifically, the Census Bureau will provide the state program agency with data

tabulations based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American Community Survey (ACS). Data tabulations shall include estimated rates of program eligibility and access/participation for the state overall and by various demographic, economic, and household characteristics and by county when the data allows. It also will include distributions across the same characteristics both for program participants and for those who are estimated to be eligible but do not participate. The data tabulations will be delivered either within six (6) months from the date that the state administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.

- iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to SNAP and resulting from use under this Agreement of the state data. If no comments are received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this Agreement.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this Agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the Agreement to prevent unauthorized use. The parties mutually agree that the following locations are designated for data processing, analysis, and storage within the Census Network:

Sites: Bowie Computer Center
 Suitland Federal Center
 Federal Statistical Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact (POC) for the Agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency POC:
 Kristie Arneson
 Economic Assistance Administrator
 Wyoming Department of Family Services

2300 Capitol Ave., Hathaway Bldg.
Cheyenne, WY 82002
(307) 777-6031
Kristie.arneson@wyo.gov

Census Bureau POC:

Michael Berning
Assistant Division Chief
Data Acquisition and Curation
Economic Reimbursable Surveys Division
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-2028
michael.a.berning@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. **DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS**

This Agreement is effective on the date on which it is signed by both parties. The Agreement shall terminate 5 years following the date on which it becomes effective. If, at the end of five (5) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this Agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, in order to determine whether it should be revised, renewed or canceled. The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Notwithstanding all other provisions of this Agreement, the Parties agree that:

- A. This Agreement may be amended at any time by written mutual consent of both parties.
- B. Either party may terminate this Agreement upon thirty (30) days written notice to the other party.

To the extent permitted by federal law, the original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3, Terms and Conditions. Any revisions to the data retention timetable after the execution of this Agreement will be stated in writing in an amendment

to this Agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this Agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this Agreement.

To promote organizational transparency, and in support of data discovery for current and future research projects, the U.S. Census Bureau posts non-sensitive data documentation to public-facing websites. This documentation, such as a record layout or data dictionary, can include file descriptions, variable lists, variable labels and valid values for each variable.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this Agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5 U.S.C. App. 3, a review of this Agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this Agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

The Census Bureau will promptly consider and adjudicate, in accordance with Federal law, claims which may arise for damages of any nature arising out of a Census Bureau act under this Agreement. Such adjudication will be pursued under the Federal Tort Claims Act, 28 U.S.C. Section 2671 et seq.; the Federal Employees Compensation Act, 5 U.S.C. Section 8101 et seq., or such other legal authority as may be pertinent. The U.S. Department of Justice shall determine the appropriate venues for any litigation arising under this Agreement.

7. CONFIDENTIALITY

A. IT Security

The Wyoming Public Records Act protects the confidentiality of the state data, as well as:

- Supplemental Nutrition Assistance Program, 7 U.S.C. § 2020 (e)(8);
- 7 CFR Part 272.1(c);
- Social Security Act, 42 U.S.C. § 1396(a)(a)(7);
- Social Security Administration Disclosure, 20 CFR Part 401;
- Public Assistance Programs (Public Welfare), 45 CFR Part 205.50; and
- U.S. Department of Labor Employment and Training Administration, 20 CFR Part 603.

The Census Bureau will comply with all federal laws applicable to the privacy or security of data received pursuant to this Agreement. As a federal agency, the Census Bureau is not subject to state laws; however the Census Bureau will comply with the requirements of applicable state laws to the extent that they do not conflict with the Census Bureau's requirements under federal law.

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, United States Code. The data provided under this Agreement are confidential under 13, U.S.C. § 9. Per the Federal Cybersecurity Enhancement Act of 2015, these data are also protected from cybersecurity risks through screening of the systems that transmit the data. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the Chief Information Officer ("CIO"), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*." Security controls and subsequent assessments are to be completed based on the final categorization.

Cloud providers must be approved for at least moderate level information through the GSA FedRAMP process prior to acquiring any services. Census Bureau identifies, assesses and authorizes use based on the published FedRAMP results and an assessment of any Census Bureau (customer provided) controls

implemented to protect the infrastructure and data. Security reporting on cloud providers is reported to the Department of Commerce on a regular basis under FISMA.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum M-17-12. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team ("US CERT"). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

B. Disclosure Avoidance Review of Statistical Products

Title 13, Section 9 of the United States Code (U.S.C.) requires the Census Bureau to keep confidential the information collected from the public under the authority of Title 13. Section 214 of Title 13, U.S.C., and Sections 3551, 3559 and 3571 of Title 18, U.S.C., provide for the imposition of penalties of up to five years in prison and/or up to \$250,000.00 in fines for wrongful disclosure of confidential census information.

Disclosure avoidance is the process for protecting the confidentiality of data, as required under Title 13 U.S.C. A disclosure of data occurs when someone can use published statistical information to identify an individual who has provided confidential information under a pledge of confidentiality. For data tabulations, the Census Bureau uses disclosure avoidance procedures to modify or remove the characteristics that put confidential information at risk for disclosure. Although a published table may appear to show information about a specific individual, the Census Bureau has taken steps to disguise or suppress the original data, while making sure the results are still useful. The techniques used by the Census Bureau to protect confidentiality in tabulations vary, depending on the type of data.

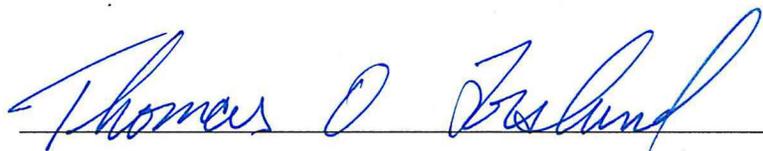
The parties understand that Title 13 confidentiality protection and disclosure avoidance techniques apply to all work described in this Agreement. The disclosure avoidance disclosure methods are defined by the Census Bureau which has the responsibility of carrying out that work. Accordingly, upon completion of the tabulation, the data produced must be reviewed by the Census Bureau to ensure that no identifiable Title 13 data are or may be disclosed. Should the Census Bureau's Disclosure Review Board (DRB) determine that the requested statistical product does or reasonably could result in such disclosure, then the data product will be modified prior to approval for release to the party(ies) to this Agreement. The DRB must approve before a research product can be released to an individual who does not have SSS and a need to know, or moved to a computer not approved for controlled data according to Census' existing policies and procedures.

8. **APPROVALS**

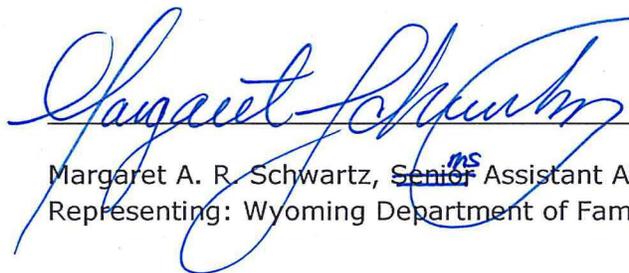
The parties to this MOU, through their duly authorized representatives, have executed this MOU on the dates set out below, and certify that they have read, understood, and agreed to the terms and conditions of this MOU as set forth herein.



2-15-2018
Nick Orsini (Date)
Assistant Director, Economic Programs
U.S. Census Bureau



3/8/18
Thomas O. Forslund (Date)
Director
Wyoming Department of Family Services



179035 Mar. 22, 2018
Margaret A. R. Schwartz, ~~Senior~~^{MS} Assistant Attorney General (Date)
Representing: Wyoming Department of Family Services

Attachment A: Data Elements

1. Data Requirements

Monthly data from the administration of SNAP for the years 2004—2022 will include, when available:

- a. Case unit identifiers,
- b. Active Participant definitions,
- c. Complete monthly case unit address history (residence, mailing),
- d. Benefit amounts received (monthly),
- e. Income reporting requirement (simplified reporting, change reporting, etc.),
- f. Gross income (monthly),
- g. Net income (monthly),
- h. Eligibility and denial information,
- i. Identifiers for individuals in case units, and
- j. The following information on individuals in a case unit:
 - i. Name
 - ii. Social Security Number
 - iii. Case unit/main contact phone number
 - iv. Relationship to primary recipient
 - v. Race
 - vi. Hispanic origin/Ethnicity
 - vii. Sex
 - viii. Date of birth
 - ix. Gross income (monthly)
 - x. Net Income (monthly)
 - xi. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)
 - xii. Education
 - xiii. Employment

Attachment B: Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records

The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data; explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of state programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing likely eligible non-participants of SNAP

Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. **Improve Census Bureau Record Linkage Methods**

The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. **Research, Testing and Operations for the 2020 Census**

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

- A. validating and enhancing the Master Address File (MAF);¹
- B. designing and assigning resources to carry out the 2020 Census;²
- C. unduplicating public, private, and census lists; and
- D. imputing missing data.³

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

¹ Examples of possible Census Bureau uses include updating and evaluating the Master Address File.

² Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.

³ Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
WOMEN, INFANTS, AND CHILDREN ADMINISTRATIVE DATA
FROM
THE WISCONSIN DEPARTMENT OF HEALTH SERVICES
WOMEN, INFANTS, AND CHILDREN (WIC) PROGRAM
Agreement No. [0094-FY17-PAY-007]

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Wisconsin Department of Health Services Women, Infants, and Children (WIC) Program for the acquisition of WIC Administrative Data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the Wisconsin Department of Health Services WIC Program to share WIC data and enter into this agreement is Section 17 of the Child Nutrition Act of 1966, 42 U.S.C. § 1786 and implementing regulations at 7 CFR Part 246. WIC regulations at 7 CFR 246.26(d)(1)(ii) limit the disclosure of WIC recipient information to those directly connected with the administration or enforcement of the WIC program. The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the WIC program because Census will provide to the state copies of its research tabulations for the state to use in administering its WIC program.

Additional authority for the Wisconsin DHS WIC Program to enter into this agreement was granted by the Data Governance Board in the Department of Health Services.

3. TERMS AND CONDITIONS

Pursuant to this agreement, the Wisconsin DHS WIC Program, hereinafter referred to as "the state program agency", will transfer records to the Census Bureau from the administration of WIC, hereinafter referred to as "the state data" and as described in Attachment A of this agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and those Special Sworn Status ("SSS") researchers participating in the projects will have access to the data. Access shall be limited to the minimum number of individuals necessary. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it will not be disclosed in individually-identifiable form and results

will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. To the extent provided by law, the Census Bureau will recognize the state program agency as the owner of the original data in the form that it is delivered to the Census Bureau, prior to its integration with confidential Census data. As owner of the original form of data only, the state program agency acknowledges that it has no ownership or control over the access, use or disclosure of confidential Census data, including the linked files containing both the original data and confidential Census data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

- i. To transfer to the Census Bureau via secure FTP (File Transfer Protocol) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of WIC for the years 2010–2022, as described in Attachment A.
- ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, and record length.
- iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers will not contain any state data or direct identifiers.
- iv. To allow the Census Bureau staff and Special Sworn Status (SSS) researchers to use the state data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

- i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.
- ii. To provide the state program agency with a copy of data tabulations that the Census Bureau will create for Census research purposes. Specifically, the Census Bureau will provide the state program agency with data tabulations based on at least two consecutive calendar based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American Community Survey (ACS). Data tabulations shall include estimated rates of program eligibility and access/participation for the state overall and by various demographic, economic, and household characteristics and by county when the data allow. It also will include distributions across the same characteristics both for program participants and for those who are estimated to be eligible but do not participate. The data tabulations will be delivered either within six (6) months from the date that the state

administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.

- iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to WIC and resulting from use under this agreement of the state data. If no comments are received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this agreement.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the agreement to prevent unauthorized use.

Processing Sites: Bowie Computer Center
 Suitland Federal Center
 Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency POC:

Lisa Murphy
WIC & Nutrition Section Chief
Wisconsin Department of Health Services
1 W Wilson St
Madison, WI 53701
(608) 266-6780
Lisa.Murphy@wisconsin.gov

Census Bureau POC:

Dr. Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. FUNDING

The total amount to be paid by the Census Bureau to the state program agency via Electronic Funds Transfer (EFT) is \$10,000.00. Funding is provided as financial support to reimburse the state program agency for resources needed to develop, set up, complete the data extraction, and deliver an initial production file within the first two years of this agreement, as described in Attachment C. The funding is only obligated for Task 1 in the Statement of Work (Attachment C). Tasks 2-7 will be completed on a no-funds-exchanged basis. This Agreement is considered to be a firm commitment.

6. ACCOUNTING DATA

State Agency Accounting Data:

Appropriation No.: **14800**

CAN:

DUNS No.: **0364488350000**

EIN: **39-6006469**

Total Amount: **\$10,000.00**

Control Number:

Census Bureau Accounting Data:

Agency Location Code: **13-04-0001**

Project Code: **6750C01**

Division Code: **0094**

Object Class Code: **25-30-07-00**

TAS: **013 2017 2018 0450 000**

Business Event Type Code (BETC): **DISB**

Funds Expiration: **9/30/2018**

Funds Cancellation Date: **9/30/2023**

Organization Code: **11-09-0094-00-00-00-00**

DUNS No.: **929955383**

EIN: **52-0204537**

Total Amount: **\$10,000.00**

Agreement No.: **0094-FY17-PAY-007**

7. FINANCIAL POINTS OF CONTACT

State Agency Financial Contact:

James Otterson
Financial Management Supervisor
Division of Enterprise Services
1 W Wilson St Room 756
Madison, WI 53701
(608) 267-3904
James.Otterson@wisconsin.gov

Census Bureau Financial Contact: Darrell Blyden
Chief, Financial Services Center
Finance Division
U.S. Census Bureau
4600 Silver Hill Road
Washington, DC 20233
(301) 763-4390
Darrell.b.blyden@census.gov

8. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement will terminate six (6) years following the date on which it becomes effective. If, at the end of six (6) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties will review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, in order to determine whether it should be revised, renewed or canceled. The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Notwithstanding all other provisions of this agreement, the Parties agree that:

- a. This agreement may be amended at any time by written mutual consent of both parties.
- b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

To the extent permitted by federal law, the original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3. Terms and Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

9. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty

(30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

The Census Bureau will promptly consider and adjudicate, in accordance with Federal law, claims which may arise for damages of any nature arising out of a Census Bureau act under this agreement. Such adjudication will be pursued under the Federal Tort Claims Act, 28 U.S.C. Section 2671 et seq., the Federal Employees Compensation Act, 5 U.S.C. Section 8101 et seq., or such other legal authority as may be pertinent. The U.S. Department of Justice shall determine the appropriate venues for any litigation arising under this agreement.

10. CONFIDENTIALITY

State Statute Chapter 153 protects the confidentiality of the state data, as well as WIC regulations at 7 CFR 246.26(e). The Census Bureau will comply with all federal laws applicable to the privacy or security of data received pursuant to this agreement. As a federal agency, the Census Bureau is not subject to state laws, however the Census Bureau will comply with the requirements of applicable state laws to the extent that they do not conflict with the Census Bureau's requirements under federal law.

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO (Chief Information Officer), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2:*

Appendices." Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

11. APPROVALS


_____ 5/24/2017
Dr. John Eltinge (Date)
Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau


_____ 6/5/17
Chuck Warzecha (Date)
Deputy Administrator
Division of Public Health
Wisconsin Department of Health Services

Attachment A: Data Elements

1. Data Requirements

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- a. Case unit identifiers,
- b. Complete monthly case unit address history (residence, mailing),
- c. Benefits received date,
- d. Income reporting requirement (simplified reporting, change reporting, etc.),
- e. Income (monthly),
- f. Eligibility and denial information,
- g. Identifiers for individuals in case units, and
- h. The following information on individuals in a case unit:
 - i. Name
 - ii. Case unit/main contact phone number
 - iii. Relationship to primary recipient
 - iv. Recipient or Caretaker phone number
 - v. Race
 - vi. Hispanic origin/Ethnicity
 - vii. Sex
 - viii. Date of birth
 - ix. Education
 - x. Employment
 - xi. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)

Attachment B: Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records

The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of state programs in the American Community Survey (ACS), the Current Population Survey (CPS) and the Survey of Income and Program Participation (SIPP). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing WIC participants and likely eligible non-participants of WIC

WIC data linked to ACS data can provide characteristic information for women, infants, and children participating in the WIC program. Additionally, infants and children with a high probability of being eligible for WIC can be estimated using ACS information on family structure, reported income, and public assistance.¹ The estimated eligible infants and children can be matched to the administrative WIC data to determine who is estimated to be eligible but not participating in the program, helping agencies determine unmet need. The project results can help state agencies improve outreach efforts. This research helps the Census Bureau better understand their survey and census data.

3. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System (PVS) uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records. However, coverage for

¹ Eligible pregnant and breastfeeding women cannot be identified in ACS data.

some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

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- B. designing and assigning resources to carry out the 2020 Census;³
- C. unduplicating public, private, and census lists; and
- D. imputing missing data.⁴

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American population and economy. As Census and other Federal Statistical Agencies successfully

² Examples of possible Census Bureau uses include updating and evaluating the Master Address File.

³ Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.

⁴ Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

Attachment C: Statement of Work for WIC Data Extraction

**Statement of Work
for the
U.S. Census Bureau Funding of the Data Extraction Preparation by
the
Wisconsin Department of Health Services for
WIC Administrative Data**

Under the referenced MOU [0094-FY17-PAY-007] through which the Census Bureau is acquiring WIC Administrative Data from the Wisconsin Department of Health Services, Census Bureau funding reimburses the Department of Health Services efforts to extract WIC data for the years CY2010-CY2022, by providing funds to complete the following tasks:

Task 1 – Analysis, Design, and Initial File Delivery

Through this task, the Wisconsin Department of Health Services has agreed to provide WIC recipient data to the US Census Bureau. This data exists in the Wisconsin WIC Program Data Collection System. While there is no charge for the data, a considerable amount of design, programming, and testing work is needed to extract the data elements needed by the Census Bureau and create a series of “flat files” for transmission to the Census Bureau. We will extract WIC case and client details for CY2010 through CY2016, create a series of files, review the files for accuracy, and provide them to the Census Bureau, along with a data dictionary and record layout, or other similar documentation. This task is expected to be completed by December 31, 2017 with delivery of all CY2010-CY2016 files.

Task 2 – Delivery of CY2017 Data

Through this task, the CY2017 data can be provided after CY2017 is complete. This is expected to be completed by February 2018.

Task 3 – Delivery of CY2018 Data

Through this task, the CY2018 data can be provided after CY2018 is complete. This is expected to be completed by February 2019.

Task 4 – Delivery of CY2019 Data

Through this task, the CY2019 data can be provided after CY2019 is complete. This is expected to be completed by February 2020.

Task 5 – Delivery of CY2020 Data

Through this task, the CY2020 data can be provided after CY2020 is complete. This is expected to be completed by February 2021.

Task 6 – Delivery of CY2021 Data

Through this task, the CY2021 data can be provided after CY2021 is complete. This is expected to be completed by February 2022.

Task 7 – Delivery of CY2022 Data

Through this task, the CY2022 data can be provided after CY2022 is complete. This is expected to be completed by February 2023.

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE UTAH DEPARTMENT OF WORKFORCE SERVICES

Agreement No. 0094-FY17-NFE-0105

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Utah Department of Workforce Services (DWS) for the acquisition of Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF) data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for DWS to share SNAP data and enter into this agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026. The Food and Nutrition Act of 2008 limits the use of SNAP recipient information to those directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the SNAP program because Census will provide to the state copies of its research tabulations for the state to use in administering its SNAP program.

The authority for DWS to share TANF data and enter into this agreement is the Public Health and Welfare Act, 42 U.S.C. § 613 and Section 1137 of the Social Security Act (42 U.S.C. 1320b-7). The Administration for Children and Families, through a Memorandum signed on December 7, 2016, has determined that sharing the data with the Census Bureau is consistent with the federal regulations implementing the disclosure requirements, 45 CFR 205.50, because the data are to be used to improve the accuracy of information the Census Bureau collects and states use that data in program management, policy-making and administration of TANF.

3. TERMS AND CONDITIONS

Pursuant to this agreement, DWS, hereinafter referred to as "the state program agency" shall transfer records to the Census Bureau from the administration of SNAP and TANF, hereinafter referred to as "the state data" and as described in Attachment A of this agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and those Special Sworn Status ("SSS") researchers participating in the projects will have access to the data. Access shall be limited to the

minimum number of individuals necessary. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it may not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. To the extent provided by law, the Census Bureau will recognize the state program agency as the owner of the original data in the form that it is delivered to the Census Bureau, prior to its integration with confidential Census data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

- i. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) data from the administration of SNAP and administration of TANF for the years 2004—2022, as described in Attachment A.
- ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, record length and data dictionary.
- iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers may not contain any state data or direct identifiers.
- iv. To allow the Census Bureau staff and SSS researchers to use the state data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

- i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.
- ii. To provide the state program agency with a copy of data tabulations, to include matched microdata, that the Census Bureau will create for Census research purposes. Specifically, the Census Bureau will provide the state program agency with data tabulations based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American Community Survey (ACS). Data tabulations shall include estimated rates of program eligibility and access/participation for the state overall and by various demographic, economic, and household characteristics and by county when the data allow. It also will include distributions across the same characteristics both for program participants and for those who are estimated to be eligible but do not participate. The data tabulations will be delivered either within six

(6) months from the date that the state administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.

- iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to SNAP and TANF and resulting from use under this agreement of the state data. If no comments are received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this agreement.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the agreement to prevent unauthorized use.

Processing Sites: Bowie Computer Center
 Suitland Federal Center
 Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency POC:

Collin Peterson
MIS Supervisor
Utah Department of Workforce Services
140 E 300 S
Salt Lake City, UT 84111
801-526-9363
collinpeterson@utah.gov

Census Bureau POC:

Dr. Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement shall terminate six (6) years following the date on which it becomes effective. If, at the end of six (6) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, in order to determine whether it should be revised, renewed or canceled. The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Notwithstanding all other provisions of this agreement, the Parties agree that:

- a. This agreement may be amended at any time by written mutual consent of both parties.
- b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

To the extent permitted by federal law, the original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3. Terms and Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers

and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

The Census Bureau will promptly consider and adjudicate, in accordance with Federal law, claims which may arise for damages of any nature arising out of a Census Bureau act under this agreement. Such adjudication will be pursued under the Federal Tort Claims Act, 28 U.S.C. Section 2671 et seq., the Federal Employees Compensation Act, 5 U.S.C. Section 8101 et seq., or such other legal authority as may be pertinent. The U.S. Department of Justice shall determine the appropriate venues for any litigation arising under this agreement.

7. CONFIDENTIALITY

Utah Code Title 63G, Chapter 2 protects the confidentiality of the state data, as well as:

- Medicaid, 42 U.S.C. § 1396(a)(a)(7), 42 CFR Part 431.300-307;
- Temporary Assistance to Needy Families, 42 U.S.C. § 602 (a)(1)(A)(iv);
- Supplemental Nutrition Assistance Program, 7 U.S.C. § 2020 (e)(8);
- 7 CFR Part 272.1(c);
- Social Security Act, 42 U.S.C. § 1396(a)(a)(7);
- Social Security Administration Disclosure, 20 CFR Part 401;
- Child Support, 42 U.S.C. § 654(26);
- Public Assistance Programs (Public Welfare), 45 CFR Part 205.50; and
- U.S. Department of Labor Employment and Training Administration, 20 CFR Part 603.

The Census Bureau will comply with all federal laws applicable to the privacy or security of data received pursuant to this agreement. As a federal agency, the Census Bureau is not subject to state laws, however the Census Bureau will comply with the requirements of applicable state laws to the extent that they do not conflict with the Census Bureau's requirements under federal law.

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the Chief Information Officer ("CIO"), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*"

and NIST Special Publication 800-60r1 "Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices." Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team ("US CERT"). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

8. APPROVALS



Dr. John Eltinge (Date)
Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

3/20/2017



Jon Pierpont (Date)
Executive Director
Utah Department of Workforce Services

4/17/17

Attachment A: Data Elements

1. Data Requirements

Monthly data from the administration of SNAP and TANF for the years 2004–2022 will include, when available:

- a. Case unit identifiers,
- b. Complete monthly case unit address history (residence, mailing),
- c. Benefit amounts received (monthly),
- d. Income reporting requirement (simplified reporting, change reporting, etc.),
- e. Gross income (monthly),
- f. Net income (monthly),
- g. Eligibility and denial information,
- h. Identifiers for individuals in case units, and
- i. The following information on individuals in a case unit:
 - i. Name
 - ii. Social Security Number
 - iii. Case unit/main contact phone number
 - iv. Relationship to primary recipient
 - v. Race
 - vi. Hispanic origin/Ethnicity
 - vii. Sex
 - viii. Date of birth
 - ix. Education
 - x. Employment
 - xi. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)

Attachment B: Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records

The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of state programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing likely eligible non-participants of SNAP

Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to

each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

- A. validating and enhancing the Master Address File (MAF);¹
- B. designing and assigning resources to carry out the 2020 Census;²
- C. unduplicating public, private, and census lists; and
- D. imputing missing data.³

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American

1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.

2 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.

3 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
ADMINISTRATIVE DATA
FROM THE ARIZONA DEPARTMENT OF ECONOMIC SECURITY

Agreement No. 0094-FY17-NFE-0059

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Arizona Department of Economic Security for the acquisition of Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF) data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the Arizona Department of Economic Security to share SNAP data and enter into this agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026. The Food and Nutrition Act of 2008 limits the use of SNAP recipient information to those directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the SNAP program because Census will provide to the state copies of its tabulations of the data for the state to use in administering its SNAP program.

The authority for the Arizona Department of Economic Security to share TANF data and enter into this agreement is the Temporary Assistance for Needy Families (TANF) Block Grant, 42 U.S.C. § 613.

Additional authority for the state program agency to enter into this agreement is ARS §41-1959(C)(5).

3. TERMS AND CONDITIONS

Pursuant to this agreement, the Arizona Department of Economic Security (AZDES), hereinafter referred to as "the state program agency" shall transfer records to the Census Bureau from the administration of SNAP and TANF, hereinafter referred to as "the state data" and as described in Attachment A of this agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and

the Privacy Act of 1974, 5 U.S.C § 552a. To the extent provided by law, only Census Bureau staff and Special Sworn Status ("SSS") researchers will have access to the data. Any data, records, or other information shared through this research agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement. When the Census Bureau publicly releases information related to this research, it may not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

- i. To transfer to the Census Bureau via secure File Transfer Protocol (FTP) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of SNAP and administration of TANF for the years 2009—2021, as described in Attachment A.
- ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, record length and data dictionary.
- iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers may not contain any state data or direct identifiers.
- iv. To allow the Census Bureau staff and SSS researchers to use the state data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

- i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.
- ii. To provide the state program agency an aggregate table package based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American Community Survey (ACS). A table package shall include estimated rates of program eligibility and access/participation for the state overall and by various demographic, economic, and household characteristics and by county when the data allow. It also will include distributions across the same characteristics both for program participants and for those who are estimated to be eligible but do not participate. The table package will be

delivered either within six (6) months from the date that the state administrative records are processed and provided to Census Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.

- iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to SNAP and TANF and resulting from use under this agreement of the state data. If no comments are received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this agreement.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the agreement to prevent unauthorized use.

Processing Sites: Bowie Computer Center
 Sultland Federal Center
 Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency POC: Carolyn McMahon
 Data Security Manager
 Department of Economic Security
 1789 W Jefferson St.
 Phoenix, AZ
 (602) 542-0317
 CMcMahon@azdes.gov

Census Bureau POC: Dr. Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement, and the similarly descriptive Data Sharing Request detailed in Attachment C, are effective on the date on which it is signed by both parties. The agreement shall terminate six (6) years following the date on which it becomes effective. If, at the end of six (6) years, the parties wish to continue the relationship, they must execute a new agreement.

In order to determine whether the agreement should be revised, renewed or canceled, the state program agency and the Census Bureau's Associate Director for Research and Methodology will periodically review the terms of the agreement, at a minimum of at least once every three (3) years, to ensure it conforms with state program agency Policies and Procedures, as well as current and newly enacted Federal statutes or state law. In the event changes in either federal or state law, statutes or regulations occur that conflict with the terms of the agreement or render the terms of the agreement void, impracticable, or otherwise impossible, this agreement will terminate immediately. A new agreement or an amendment to the existing agreement will be initiated to provide for any changes that cannot be accommodated within the provisions of the existing agreement. The Census Bureau shall hold harmless the State of Arizona and its Department of Economic Security for any liability resulting from acts or omissions attributable to the Census Bureau.

Notwithstanding all other provisions of this agreement, the Parties agree that:

- a. This agreement may be amended at any time by written mutual consent of both parties.
- b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

In accordance with A.R.S. §38-511, the state program agency may within three (3) years after execution cancel the agreement, without penalty or further obligation, if any person significantly involved in initiating, negotiating, securing, drafting or creating the agreement on behalf of the State, at any time while the agreement is in effect, becomes an employee or agent of any other party to the agreement in any capacity or a consultant to any other party to the agreement with respect to the matter of the Agreement.

So long as it is not inconsistent with federal law, the original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3. Terms and Conditions. Any revisions to the data retention timetable after the execution of this agreement will be stated in writing in an amendment to this agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

To the extent permitted by federal records retention law, and in accordance with A.R.S. §35-214, and to the extent that A.R.S. §35-214 does not conflict with federal law, the Census Bureau shall retain all data and other records ("records") relating to the MOU for a period of five (5) years after the completion of the MOU. Authorized representatives of AZDES shall have access to any pertinent books, documents, papers and records of the parties to this agreement, in order to inspect or monitor compliance under this MOU, as authorized by law and so long as such access is not prohibited by federal law. So long as such access is not prohibited by federal law, the Census Bureau, upon request, shall produce the original of any or all such records.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

7. CONFIDENTIALITY

Arizona Revised Statutes Section 41-1959 and Section 46-135, including accompanying Arizona Administrative Code Rules 6-12-102 and 6-14-105, protect the confidentiality of the state data, as well as:

- Medicaid, 42 U.S.C. § 1396a(a)(7), 42 CFR Part 431.300-307;
- Temporary Assistance to Needy Families, 42 U.S.C. § 602 (a)(1)(A)(iv);
- Supplemental Nutrition Assistance Program, 7 U.S.C. § 2020 (e)(8);
- 7 CFR Part 272.1(c);
- Child Support, 42 U.S.C. § 654(26);
- Public Assistance Programs (Public Welfare), 45 CFR Part 205.50; and
- U.S. Department of Labor Employment and Training Administration, 20 CFR Part 603.

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9.

Census Bureau employees and individuals with Special Sworn Status are data stewards with the responsibility to protect the confidentiality and privacy of information that is entrusted to them. This means that data and information are handled appropriately, as authorized, and in compliance with relevant laws. The Data Stewardship Awareness Training is mandatory and required to be taken annually. Data Stewardship Awareness training includes IT Security Awareness, Title 13 and Privacy Act responsibilities to reinforce the Census Bureau's strict confidentiality and privacy standards, and how those standards apply to every day work life. Failure to adhere to confidentiality standards may result in a civil suit, a fine of up to \$250,000 and/or imprisonment of up to 5 years.

Upon receipt, all data acquired as a result of this Interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the Chief Information Officer ("CIO"), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*." Security controls and subsequent assessments are to be completed based on the final categorization.

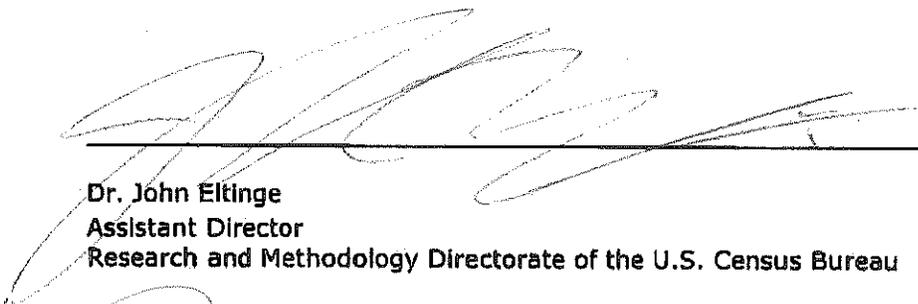
The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team ("US CERT"). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the

Identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

8. Non-Discrimination

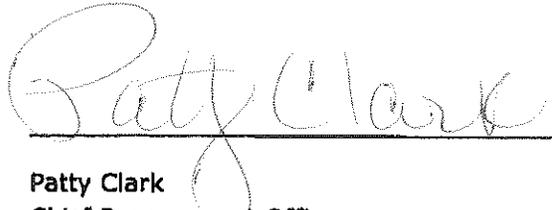
Consistent with federal law, the Census Bureau shall comply with non-discrimination rules and regulations, including the Americans with Disabilities Act.

9. APPROVALS



Dr. John Eltinge
Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

1/23/17
(Date)



Patty Clark
Chief Procurement Officer
Arizona Department of Economic Security

2/9/17
(Date)



Dr. Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
Research and Methodology Directorate of the U.S. Census Bureau

(Date)



Carolyn McMahon
Data Security Manager
Arizona Department of Economic Security

1/26/17
(Date)



2-3-17

Cari Allen
Division of Technology Services (DTS) Service Delivery Manager
Arizona Department of Economic Security

(Date)



2.3.17

Jeffrey Raynor
Chief Information Security Officer
Arizona Department of Economic Security

(Date)

Attachment A: Data Elements

1. Data Requirements

Monthly data from the administration of SNAP and TANF for the years 2009—2021 will include, when available:

- a. Case unit identifiers,
- b. Complete monthly case unit address history (residence, mailing),
- c. Benefit amounts received (monthly),
- d. Income reporting requirement (simplified reporting, change reporting, etc.),
- e. Gross income (monthly),
- f. Net income (monthly),
- g. Eligibility and denial information,
- h. Identifiers for individuals in case units, and
- i. The following information on individuals in a case unit:
 - i. Name
 - ii. Case unit/main contact phone number
 - iii. Relationship to primary recipient
 - iv. Race
 - v. Hispanic origin/Ethnicity
 - vi. Sex
 - vii. Date of birth
 - viii. Education
 - ix. Employment
 - x. Monthly income source (earnings, TANF, UI, general assistance, other)

Attachment B: Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records

The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of state programs in the American Community Survey ("ACS"), the Current Population Survey ("CPS") and the Survey of Income and Program Participation ("SIPP"). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing likely eligible non-participants of SNAP

Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System ("PVS") uses administrative records from a variety of sources to assign, where possible, unique person identifiers to

each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

- A. validating and enhancing the Master Address File (MAF);¹
- B. designing and assigning resources to carry out the 2020 Census;²
- C. unduplicating public, private, and census lists; and
- D. imputing missing data.³

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American

¹ Examples of possible Census Bureau uses include updating and evaluating the Master Address File.

² Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.

³ Examples of possible Census Bureau uses include Item imputation and count imputation using information from a composite of public and private data sources.

population and economy. As Census and other Federal Statistical Agencies successfully integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

Attachment C: Arizona Department of Economic Security – Data Sharing Request

J-119 DSA (11/2016)

ARIZONA DEPARTMENT OF ECONOMIC SECURITY
Information Risk Management,
3443 North Central, Site Code 829Z
Phoenix, Arizona 85012
Phone: (602) 771-2676 • Fax: (602) 364-0481

DATA-SHARING REQUEST/AGREEMENT

BETWEEN

REQUESTING ENTITY:

U.S. Census Bureau

(DES Division/Administration/Program/Office Name or External Organization Name)

AND

DATA MANAGER: ARIZONA DEPARTMENT OF ECONOMIC SECURITY

DBME / Family Assistance Administration

(Division/Administration/Program/Office Name)

DSA Effective Date: _____ Contract Start Date: _____ Contract Max End Date: <i>(if applicable)</i> _____	DSA Agreement No.: _____ Contract No.: _____ UID: _____
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SECTION I. REQUEST (Completed by Requesting Entity)*Use attachment if necessary*

1a. PURPOSE OF THIS REQUEST (What information is being requested and why? How will it be used? Define Business need. Give details/specifics.)
Case and Demographic Data from the administration of SNAP and TANF for the years 2009—2021

1. Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records
 This project will focus on evaluating and improving the measurement of state programs in the American Community Survey (ACS), the Current Population Survey (CPS) and the Survey of Income and Program Participation (SIPP).

2. Characterizing likely eligible non-participants of SNAP
 This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs.

3. Improve Census Bureau Record Linkage Methods
 The Census Bureau's Person Identification Validation System (PVS) uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS

4. Research, Testing and Operations for the 2020 Census

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes
 This research is important to expand the Census Bureau data linkage infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. This is becoming mission critical to the Census Bureau. The data linkage infrastructure enables data discovery and secure analytic access for policy analysis, program evaluation, and research.

1b. INFORMATION TECHNOLOGY AND CONNECTIVITY TYPE (vpn, DVD, citrix, Mainframe, etc; or some other alternative way of accessing application / data?) Select all appropriate and explain in detail Below: Citrix VPN-Client MainFrame Secure-FTP Secure-Email Other
 DES will transfer to the Census Bureau via secure FTP (File Transfer Protocol) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of SNAP for the years 2009—2021, as described in Attachment A. DES will provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, record length and data dictionary.

1c. INFORMATION TYPE BEING ACCESSED (personal identifiable information, FBI, SSA, HIPPA, define)

Data from the administration of SNAP and TANF for the years 2009—2021 will include, when available:

- a. Case unit identifiers,
- b. Complete monthly case unit address history (residence, mailing),
- c. History of benefit amounts received (monthly),
- d. Income reporting requirement (simplified reporting, change reporting, etc.),
- e. Gross income (monthly),
- f. Net income (monthly),
- g. Eligibility and denial information,
- h. Identifiers for individuals in case units, and
- i. The following information on individuals in a case unit:
 - i. Name
 - ii. Case unit/main contact phone number
 - iii. Relationship to primary recipient
 - iv. Race
 - v. Hispanic origin/Ethnicity
 - vi. Sex
 - vii. Date of birth
 - viii. Education
 - ix. Employment
 - x. Monthly income source (earnings, TANF, UI, general assistance, other)
 - xi. History of membership in case unit

1d. WILL THIS INFORMATION BE RETAINED?

Yes No If Yes, where and how?: So long as it is not inconsistent with federal law, the original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary

PLEASE SELECT THE TYPE OF INFORMATION REQUESTED AND SPECIFIC FIELDS

HIPPA PCI PHI PII Full name Home address SSN or National Identification number Vehicle registration plate
 Driver's license# Fingerprints Credit card numbers Digital identity Date of birth Birthplace Gender/race
 Health/ Medical records Wage/Tax info Telephone number Criminal record Medical Benefits eligibility records

The requester enters all information required for successful communication between the requesting entity and the DES IT Staff.

Contact Name (1): Dr. Amy O'Hara, Center Chief, Center for Administrative Records Research and Applications	Phone: (301) 763-5757
Contact Name (2): Katherine Reeves	Phone: (301) 763-7912
Contact Address: 4600 Silver Hill Rd, Washington, DC 20233	
Contact (1) E-Mail Address: amy.b.ohara@census.gov	Contact (2) E-Mail Address: katherine.l.reeves@census.gov
Contact Fax No: () -	

SECTION I. (cont.) <i>REQUEST (Completed by Requesting Entity)</i> <small>Use attachment if necessary</small>	
2. CITE LAW, REGULATION, DIRECTIVE OR OTHER BASIS FOR THIS REQUEST	
<p>The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.</p> <p>The authority for the state agency to share SNAP data and enter into this agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026.</p> <p>The authority for the Arizona Department of Economic Security to share TANF data and enter into this agreement is the Public Health and Welfare Act, 42 U.S.C. § 613.</p> <p>Additional authority for the state program agency to enter into this agreement is ARS §41-1959(C)(5).</p>	
3. WILL OTHER ENTITIES INTERFACE/WORK WITH YOUR ORGANIZATION?	
<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes, identify entity and reason(s): Special Sworn Status individuals may access the data from the Economic Research Service of the FNS of the USDA to complete projects 2 and 5, as listed in #1 on this form. No PII data will be disclosed.</p>	
4. WILL INFORMATION BE DISCLOSED/SHARED WITH ANOTHER ENTITY / ORGANIZATION?	
<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes, identify the entity/Organization and reason(s) for disclosure: The Economic Research Service Special Sworn Status researchers. No PII data will be disclosed. For projects 2 and 5. All PII data is removed once the data is cleared and has gone through the Personal Validation System and receives a unique Census Bureau 9 digit identifier.</p>	
5. WILL DES DATA BE STORED IN ANY FORM OF (DATABASES, FILES, TAPES, PAPER COPIES, ETC.) WILL DATA BELONGING TO DES BE STORED IN A SECURE SPECIFIED ON-SITE LOCATION?	
<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes, identify where, what type of data and how the data is to be stored, and for how long? So long as it is not inconsistent with federal law, data will be stored for 2 years on a secure, password protected server within the U.S. Census Bureau.</p>	
8. WHAT ARE THE SAFEGUARDS IN PLACE TO GUARD AGAINST UNAUTHORIZED ACCESS/DISCLOSURE OF THE INFORMATION; ACCESS CONTROL PARAMETERS, ROLE BASED ACCESS, ETC.	
<p><small><input checked="" type="checkbox"/> Computers are stored in Secure <input type="checkbox"/> Encryption <input checked="" type="checkbox"/> Secure Physical Location <input type="checkbox"/> Locked File Cabinet <input checked="" type="checkbox"/> 8 Characters or more Password location <input checked="" type="checkbox"/> Role based Access Permissions/Need to know</small></p> <p>Only Census Bureau staff and Special Sworn Status (SSS) researchers will have access to the data. Any data, records, or other information shared through this research agreement will be protected from unauthorized disclosure and will be used solely for statistical purposes. The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347).</p> <p>Census Bureau employees and individuals with Special Sworn Status are data stewards with the responsibility to protect the confidentiality and privacy of information that is entrusted to them. This means that data and information are handled appropriately, as authorized, and in compliance with relevant laws. The Data Stewardship Awareness Training is mandatory and required to be taken annually. Data Stewardship Awareness training includes IT Security Awareness, Title 13 and Privacy Act responsibilities to reinforce the Census Bureau's strict confidentiality and privacy standards, and how those standards apply to every day work life. Failure to adhere to confidentiality standards may result in a civil suit, a fine of up to \$250,000 and/or imprisonment of up to 5 years.</p>	

6a. IF AN INFORMATION BREACH SHOULD OCCUR, WHAT ARE YOUR PROCESSES AND PROCEDURES TO ADDRESS THIS? (SEE SECTION II, #8)

Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "Recommended Security Controls for Federal Information Systems and Organizations," as well as Special Publication 800-37r1 "Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the Chief Information Officer ("CIO"), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities. All information and information systems are categorized in accordance with NIST FIPS 199 "Standards for Security Categorization of Federal Information and Information Systems" and NIST Special Publication 800-60r1 "Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices." Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team ("US CERT"). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

7. HOW WILL THE INFORMATION BE PRESENTED FOR USE? WILL THE INFORMATION BE POSTED, DIGITALLY COPIED, APPLICATION, ETC?

The data, with PII removed and the unique 9-digit identification number, will be made available only to SSS individuals with permission rights to a server where the data is stored.

When the Census Bureau publicly releases information related to this research, it will not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data.

8. HOW WILL THIS INFORMATION BE DISPOSED OF WHEN NO LONGER NEEDED? SEE RETENTION POLICY.

To the extent permitted by federal law, the original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

So long as it is not inconsistent with federal law, the original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary.

PRINT NAME AND TITLE OF AUTHORIZED CONTACT
Amy O'Hara - Project POC
Chief, Center for Administrative Records: Research and Applications

PHONE NO. (301) 763-5757
FAX () -
E-MAIL amy.b.ohara@census.gov

DATE
6/3/2016

MAILING ADDRESS/SITE CODE
4600 Silver Hill Rd

CITY
Washington

STATE
DC

ZIP CODE
20233-

SECTION II. STIPULATIONS REGARDING THE USE OF INFORMATION
--

STIPULATIONS APPLICABLE TO THE REQUESTING ENTITY:

1. Disclosure of the data provided to the Requesting Entity is not permitted unless specifically authorized.
2. Repackaging or redistribution of data or screens, or creation of separate files will not be permitted unless specifically authorized.
3. The data shall be used only to assist in legal valid business needs as stated in Section I, item 1a of this Agreement.
4. All data shall be stored in a physically secure logically encrypted facility/system following the physical security regulations and standards based on the type of data appropriate and related standards, HIPAA / PHI / PII / PCI/ PUB-1075 etc.
5. All data in electronic format shall be safeguarded and stored, processed and monitored so that unauthorized persons cannot compromise the information.
6. DES shall be notified with in 24hrs when an information breach occurs. Notification must be in accordance with timelines based on State and Federal law.
7. Only authorized staff will be given access to accomplish the purpose(s) specified in Section I, item 1a of this Agreement.
8. Staff shall view, read or attend an authorized data security awareness training class, where they will be instructed on confidentiality, privacy laws and penalties imposed when there in any non compliance. All staff with access to DES systems and/or applications must complete an annual recertification security awareness training class as scheduled by DES.
9. A Request for Terminal Access and/or other Activity (J-125) shall be used to request specific access for each authorized staff member and must be signed by the staff supervisor or designee.
10. All authorized staff are required to sign a User Affirmation Statement (J-129), as a condition for using requested data. This affirmation statement must be resigned at three (3) year intervals as scheduled by DES.
11. Any changes requiring additional access or removal of access as, shall be reported promptly to the respective data security analyst.
12. Federal and state audit and data security personnel may have access to offices and records of the requesting entity to monitor or verify compliance with this Agreement.
13. This Data-Sharing Agreement will remain in effect for 10 years from the effective date unless otherwise stipulated in Section III or overridden by the Contract, a Memorandum of Understanding or an Inter-Agency Agreement. If duration is overridden by another document, please reference the document in Section III.
14. Upon Contract Termination, Media Sanitization procedures shall be adhered to in accordance to Arizona Statewide Policy – P8250 v 1.0 - The Business Unit shall sanitize digital and non-digital information system media containing Confidential information prior to disposal, release of organizational control, or release for reuse using defined sanitization techniques and procedures in accordance with the Media Protection Standard 58250. [NIST 800-53 MP-6] [HIPAA 164.310(d)(2)(g)] [HIPAA 164.310(d)(2)(ii)] [IRS Pub 1075]
15. All DES Contracts retention terms and conditions will be adhered to as written unless otherwise stated on DES Retention Policy ((DES 1-37-12-(01)(02)(03)) is applicable.
16. Requesting entity is responsible for all costs and licenses associated with securely connecting to DES and for maintaining confidential standards.

STIPULATIONS APPLICABLE TO HIPAA - HEALTH INSURANCE PORTABILITY & ACCOUNTABILITY ACT:

1. All staff shall attend an authorized HIPAA awareness training class, where they will be instructed on confidentiality, privacy, information safeguards and penalties imposed when compliance is breached.
2. If applicable, a "Business Associate Contract" [45 CFR 164.502(e), 154.504(e), 164.532(d) & (e)] on file and it will be attached to this data sharing agreement as an addendum.

STIPULATIONS APPLICABLE TO Division Data Owners:

1. DES Division Security Rep shall verify external or internal requesters and submit service desk ticket (SD) and attach the received (J-125 from external customers only) and process account. SD ticket must contain DSA# and all contents of attached J-125 in the SD summary field. DES Division Security Reps shall monitor and manage all accounts which have access to their data or with who this DSA in partnership.

SECTION III. ADDITIONAL INFORMATION

Regarding Stipulations #1-#16 applicable to Requesting Entity, the Census Bureau only agrees, so long as they are not inconsistent with federal law. Regarding the following specific stipulations applicable to Requesting Entity, the exceptions noted are substitutions for the original stipulations in their entirety.

Exception to stipulation #2 -

The Census Bureau will link the state data to census data, survey data and administrative records data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation. The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

Exception to stipulation #8 -

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9.

Census Bureau employees and individuals with Special Sworn Status are data stewards with the responsibility to protect the confidentiality and privacy of information that is entrusted to them. This means that data and information are handled appropriately, as authorized, and in compliance with relevant laws. The Data Stewardship Awareness Training is mandatory and required to be taken annually. Data Stewardship Awareness training includes IT Security Awareness, Title 13 and Privacy Act responsibilities to reinforce the Census Bureau's strict confidentiality and privacy standards, and how those standards apply to every day work life. Failure to adhere to confidentiality standards may result in a civil suit, a fine of up to \$250,000 and/or imprisonment of up to 5 years.

Exception to stipulation #9 -

This stipulation is not applicable.

Exception to stipulation #10-

This stipulation is not applicable.

Exception to stipulation #11 -

The parties shall review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, in order to determine whether it should be revised, renewed or canceled. The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Notwithstanding all other provisions of this agreement, the Parties agree that:

- a. This agreement may be amended at any time by written mutual consent of both parties.
- b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

Exception to stipulation #12 –

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

Exception to stipulation #13 –

This agreement is effective on the date on which it is signed by both parties. The agreement shall terminate six (6) years following the date on which it becomes effective. If, at the end of six (6) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties shall review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, in order to determine whether it should be revised, renewed or canceled. The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state program agency.

Exception to stipulations #14 and #15 –

So long as it is not inconsistent with federal law, the original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "Recommended Security Controls for Federal Information Systems and Organizations," as well as Special Publication 800-37r1 "Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the Chief Information Officer ("CIO"), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "Standards for Security Categorization of Federal Information and Information Systems" and NIST Special Publication 800-60r1 "Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices." Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team ("US CERT"). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state program agency contacts to discuss the actions and potential remedies regarding the incident.

TERMINATION OF AGREEMENT ONLY: So long as it is not inconsistent with federal law --

- a. Information will be returned based on Contract terms and conditions.
- b. Information will be truncated (erased/deleted).
- c. Information in physical form shall be shredded.
- d. All of the above.

- Yes No
- Yes No
- Yes No
- Yes No

ROUTING INSTRUCTIONS for J-119**DATA SHARING AGREEMENT BETWEEN DES ENTITIES:**

1. Section I, II and III are completed, contact information is provided and the document is signed by the requesting Division or Program Assistant Director, Program Administrator, or designee. The requesting entity Division or Program Security Analyst sends the document to the Data Managing Division/Program Security Analyst. The DSA/PSA from the Data Managing Division/Program will complete Section III and the recommendation in Section IV. If applicable, the Division HIPAA Privacy Officer will complete the recommendation in Section IV. Reason must be given if request is not recommended for approval. Section V is signed and dated by the Data Managing Assistant Director, Program Administrator or designee.

EXCEPTION: All DERS UI Data Sharing Agreements will follow their own established process.

2. The data managing Division/Program Security Analyst forwards the Agreement to the Enterprise Delivery Team for signature and approval of Information technology connectivity. Enterprise service delivery team sends DSA back to the Division/Program security team for final signatures. The Agreement is signed, and dated by the Information Security Administrator. The original Agreement is sent back to the Division/Program entered into the tracking list. The Agreement is scanned PDF to the network share, for all data sharing agreements. DSA is not final until fully signed by all parties.

NOTE:

When the agreement is modified during the approval process, both entities must review the modifications and re-sign/date the document.

DATA SHARING AGREEMENT BETWEEN DES AND AN EXTERNAL ENTITY:

1. Section I, II and III are completed by the requesting entity, contact information is provided and the document is signed by the requesting entity and Division or Program Assistant Director, Program Administrator, or designee. The Division or Program Security Analyst sends the document out for signatures. If applicable, the Division HIPAA Privacy Officer will complete the recommendation in Section IV. Reason must be given if request is not recommended for approval. Section V is signed and dated by the requesting entity administrator and Data Managing Assistant Director, Program Administrator or designee.

EXCEPTION: All DERS UI Data Sharing Agreements will follow their own established process.

2. The data managing Division/Program Security Analyst forwards the Agreement to the Enterprise Delivery Team for signature and approval of Information technology connectivity. Enterprise service delivery team sends DSA back to the Division/Program security team for final signatures. The Agreement is signed, and dated by the Information Security Administrator. The original Agreement is sent back to the Division/Program entered into the tracking list. The Agreement is scanned PDF to the network share, for all data sharing agreements. DSA is not final until fully signed by all parties.

NOTE:

When the Agreement is modified during the approval process, both entities must review the modifications and re-sign/date the document.

DATA SHARING AGREEMENT WITH INTERNAL (if applicable) EXTERNAL CONTRACTS BETWEEN ENTITIES PROCEDURES: STEP BY STEP

1. From the Contracts Division for which the Contract has been originally created, the authorized Contracts person shall contact the Security Representative from the specific Agency for which the Contract was created, notify that a Data Sharing Agreement (DSA) is needed and being requested and a copy must be sent to the Security Representative to start the process of creating a DSA.
 - a. **NOTE:** A DSA request will not be honored without a valid Contract (number) (if applicable) accompanying the DSA.
2. Any external Contracts agreed upon by DES that include the sharing of information require a J-119 - Data Sharing Agreement (DSA). The normal longevity of the J-119 DSA is 10 years. The newly agreed upon Contract terms and conditions supersedes the longevity of the DSA length of 10 years to align with the Contracts terms, conditions, and longevity.
 - a. Example: If a newly accepted Contract of 2 years needs a DSA, the DSA will align with the Contract longevity of 2 years. A DSA is created.
 - b. If at the end of the 2 years the contract is renewed for 1 more year, then the contract's personnel shall inform the Agency's Security Team of the contract extension. Agency's Security Team will update the DSA tracking database to reflect the contract extension. The DSA can be renewed every year(s) up to 10 years (the total lifecycle of a DSA) before a new DSA is created.
 - i. J-119A (Amendment Form) is required when additional access to other information not stipulated in the original DSA is being requested. For any extensions/changes of a DSA along with the following requirements:
 1. J-119A must document the changes to the original DSA.
 2. J-119A must document the new Contract Number.
 3. Document any and all changes made on the renewed Contract that involve terms and conditions in the sharing of information.
 4. Assign an agreement number to the DSA and put the Contract number on the first page of the DSA (preferably typed).
 5. DSA with other hand written notes, directions, alterations and scratch off will not be accepted by IRM.
 6. Security Representative will enter all data into the DSA Database and will select status field "pending signatures to IRM."

Words of CAUTION:

- a. Security Representative that has created the DSA will have to reproduce the DSA once again to be compliant, no exceptions.
 - b. A DSA that is attached to a Contract will not be approved by IRM without a valid contract number.
3. When the Security Representative has completed all the applicable/signatures, the DSA agreement is entered into the Data Security Warehouse Database by the Security Representative with a status of "Pending-IRM Approval." Afterwards the DSA agreement is sent to IRM, to DES Information Security Administrator, 1720 W, Madison St., Phoenix, AZ 85007 (Site Code 829Z), for final review and approval. The agreement is then signed and dated by the Information Security Administrator.
 4. The original agreement is filed in the DES Data Managing Division/Program and the IRM Security Representative confirms all data in the DSA database. The Agreement is not final until signed by the IRM Security Representative, the DES Executor, and the Requesting Entity(s).
 5. A final digital copy of all signatures of essential personnel mentioned above is required to IRM for IRM Security Administrator to change the DSA to ACTIVE with in the database.
-

MEMORANDUM OF UNDERSTANDING

ADHS MOU No. HU550021 / Census Bureau Agreement # 0094-2015-NFE-07

Memorandum of Understanding for Data Sharing ("MOU")

BETWEEN

ARIZONA DEPARTMENT OF HEALTH SERVICES ("ADHS")
DIVISION OF PUBLIC HEALTH SERVICES WIC PROGRAM (WIC)

AND

THE US CENSUS BUREAU (CENSUS BUREAU)

Definitions. Capitalized terms used herein shall have the meanings set forth in this Section [1]

1. **"Authorized Employees"** means the Census Bureau's employees who have a need to know or otherwise access Highly-Sensitive Personal Information or Personally Identifying Information to enable the Census Bureau to perform its obligations under this MOU
2. **"Authorized Persons"** means Authorized Employees who have a need to know or otherwise access Highly-Sensitive Personal Information or Personally Identifying Information to enable the Census Bureau to perform its obligations under this MOU, and who are bound in writing by confidentiality obligations sufficient to protect Personal Information in accordance with the terms and conditions of this MOU]
3. **"Highly-Sensitive Personal Information"** means an (i) individual's government-issued identification number (including social security number, driver's license number or state-issued identified number); (ii) financial account number, credit card number, debit card number, credit report information, with or without any required security code, access code, personal identification number or password, that would permit access to an individual's financial account; or (iii) biometric or health data
4. **"Personally Identifying Information"** means information provided to the Census Bureau by or at the direction of WIC, or to which access was provided to the Census Bureau by or at the direction of WIC, in the course of the Census Bureau's performance under this MOU that: (i) identifies or can be used to identify an individual (including, without limitation, names, signatures, addresses, telephone numbers, e-mail addresses and other unique identifiers); or (ii) can be used to authenticate an individual (including, without limitation, employee identification numbers, government-issued identification numbers, passwords or PINs, financial account numbers, credit report information, biometric or health data, answers to security questions and other personal identifiers), in case of both sub-clauses (i) and (ii), including, without limitation, all Highly-Sensitive Personal Information. WIC's business contact information is not by itself deemed to be Personal Information.
5. **"Security Breach"** means [(i)] any act or omission that [materially] compromises either the security, confidentiality or integrity of Personal Information or the physical, technical, administrative or organizational safeguards put in place by the Census Bureau [(or any Authorized Persons)] that relate to the protection of the security, confidentiality or integrity of Personal Information[, or (ii) receipt of a complaint in relation to the privacy practices of the Census Bureau [(or any Authorized Persons)] or a breach or alleged breach of this MOU relating to such privacy practices]

MEMORANDUM OF UNDERSTANDING

ADHS MOU No. HU550021 / Census Bureau Agreement # 0094-2015-NFE-07

1. Terms of the Agreement

This Agreement is effective on the date on which it is signed by both parties. The Agreement will terminate five (5) years following the date on which it becomes effective. If, at the end of five (5) years, the parties wish to continue the relationship, they must execute a new Agreement.

The parties will review this Agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the Agreement, in order to determine whether it should be revised, renewed or canceled. The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and ADHS.

Notwithstanding all other provisions of this Agreement, the Parties agree that:

1.1 This Agreement may be amended at any time by written mutual consent of both parties.

1.2 Either party may terminate this Agreement upon thirty (30) days written notice to the other party.

The parties to this Agreement envision that upon expiration or termination of this Agreement, that the parties will execute a new Agreement permitting the Census Bureau continued use of the original state data. For this reason, the original state data will be retained by the Census Bureau after expiration or termination of this Agreement, unless ADHS notifies the Census Bureau in writing that the original state data are not to be retained by the Census Bureau past the expiration or termination of this Agreement. If, upon expiration or termination of this Agreement, ADHS notifies the Census Bureau Point of Contact in writing that the original state data covered by this Agreement are not to be retained by the Census Bureau, the data will be expunged from Census Bureau systems, so long as the data being expunged is not inconsistent with federal records retention law.

If, upon expiration or termination of this Agreement, the Census Bureau retains the original state data, Census Bureau researchers will cease and desist all use of the state data until such time that a new Agreement is executed which permits the use of the state data by Census Bureau researchers. The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this Agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this Agreement.

2. Termination:

2.1 This MOU remains in effect until terminated in accordance with Provision One (1) of this section, or as otherwise provided below.

2.1.1 Termination without Cause

Both the ADHS and the Census Bureau may terminate this MOU at any time with thirty (30) calendar days' notice, in writing specifying the termination date. Such notices shall be given by personal delivery or by certified mail, return receipt requested.

2.1.2 Termination for Default

The ADHS reserves the right to terminate the MOU in whole or in part due to the failure of the Census Bureau to comply with any term or condition of the MOU.

MEMORANDUM OF UNDERSTANDING

ADHS MOU No. HU550021 / Census Bureau Agreement # 0094-2015-NFE-07

2 1 3 Cancellation for Conflict of Interest

Pursuant to A R S. § 38-511, the ADHS may cancel this MOU within three (3) years after MOU execution without penalty or further obligation if any person significantly involved in initiating, negotiating, securing, drafting or creating the MOU on behalf of ADHS is, or becomes at any time while the MOU or an extension of the MOU are in effect, an employee of or a consultant to any other party to this MOU with respect to the subject matter of the MOU. The cancellation shall be effective when the Census Bureau receives written notice of the cancellation, unless the notice specifies a later time.

2 1 4 Mutual Termination

This MOU may be terminated by mutual written Agreement of the parties specifying the termination date and the terms for disposition of property and, as necessary, submission of required deliverables therein.

3. Confidentiality

A R S. § 136-07 protects the confidentiality of the state data, as well as WIC regulations at 7 CFR 246.26(e). The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency Agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r3 "Recommended Security Controls for Federal Information Systems and Organizations," as well as Special Publication 800-37r1 "Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO (Chief Information Officer), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "Standards for Security Categorization of Federal Information and Information Systems" and NIST Special Publication 800-60 "Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices." Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state agency contacts to discuss the actions and potential remedies regarding the incident.

4. Utilization of Confidential Information:

4 1 The Census Bureau agrees to monitor Authorized Persons use of WIC personally identifying data and not to use or disclose confidential medical information, Personally Identifying Information or Highly-Sensitive Personal Information other than as permitted by this MOU or as required by law,

MEMORANDUM OF UNDERSTANDING

ADHS MOU No. HU550021 / Census Bureau Agreement # 0094-2015-NFE-07

- 4.2 The Census Bureau agrees to use appropriate safeguards to prevent a Security Breach, such as, but not limited to, the disclosure of confidential medical information, Personally Identifying Information or
- 4.3 Highly-Sensitive Personal Information other than as provided by this MOU,
- 4.4 The Census Bureau agrees to mitigate, to the extent practicable, any harmful effect that is known to the Census Bureau from a use or disclosure of confidential medical information, Highly-Sensitive Personal Information, or Personally Identifying Information other than as provided by this MOU,
- 4.5 The Census Bureau agrees to report to the ADHS any Security Breach, including the use or disclosure of confidential medical information, Personally Identifying Information or Highly-Sensitive Personal Information not provided in this MOU of which it becomes aware, and
- 4.6 The Census Bureau agrees to ensure that any Authorized Persons, including any agent, or subcontractor to the Census Bureau, to whom the Census Bureau provides confidential medical information, Personally Identifying Information or Highly-Sensitive Personal Information received from the ADHS or created or received by the Census Bureau on behalf of the ADHS, agrees to the same restrictions and conditions that apply through this MOU to the Census Bureau with respect to such information

5. **Records and Right of Inspection:**

To the extent permitted by federal records retention law, the Census Bureau shall retain all data and other records ("records") relating to the MOU for a period of five (5) years after the completion of the MOU. Authorized representatives of ADHS shall have access to any pertinent books, documents, papers and records of the parties to this agreement, in order to inspect or monitor compliance under this MOU, as authorized by law.

6. **Dispute Resolution:**

The parties to this MOU agree to resolve all disputes arising out of, or relating to, this MOU through administrative review and management discussion, as necessary

7. **Amendment or Modifications:**

No amendment or modifications to this MOU, including any amendment or modification of this paragraph, shall be effective unless the same is in writing signed by the Parties

8. **Relationship of Parties:**

The Census Bureau under this MOU is an independent party. Neither party to this MOU shall be deemed to be the employee or agent of the other party to the MOU

MEMORANDUM OF UNDERSTANDING

ADHS MOU No. HU550021 / Census Bureau Agreement # 0094-2015-NFE-07

9. Severability:

The Provisions of this MOU are severable. Any term or condition deemed illegal or invalid shall not affect any other term or condition of the MOU.

10. No Waiver:

Either Party's failure to insist on strict performance of any term or condition of the MOU shall not be deemed a waiver of that term or condition even if the party accepting or acquiescing in the nonconforming performance knows of the nature of the performance and fails to object to it.

11. Non-disclosure of data:

The Census Bureau shall not disclose, in whole or in part, the data described in this MOU to any individual or agency not specifically authorized by this MOU. The Census Bureau shall not disclose directly to, or use for the benefit of, any third party confidential information, knowledge or data acquired by virtue of its relationship with the other party named in this MOU, without the prior written approval of the other Party. It is understood and agreed by the Parties that the obligations of this paragraph shall survive the expiration or termination of this MOU.

12. Data Use and Ownership:

12.1 The Census Bureau may request data use approval from ADHS for development of papers or reports. Such papers, reports, or tables must have the specific written approval of the ADHS Human Subject Review Board (HSRB) before such products are submitted for presentation or publication.

12.2 ADHS shall be cited as the source of the data in all tables, reports, presentations, and scientific papers, and the Census Bureau or its corresponding authors shall be cited as the source of interpretations, calculations, and/or manipulations of the data, including data visualizations.

12.3 The Census Bureau shall furnish a copy of a proposed publication, including tables, or presentation, or request approval to the ADHS HSRB for review and comment.

MEMORANDUM OF UNDERSTANDING

ADHS MOU No. HU550021 / Census Bureau Agreement # 0094-2015-NFE-07

SCOPE OF WORK

1. Parties and Purpose

This Memorandum of Understanding establishes an Agreement between the U S Census Bureau (Census Bureau) and ADHS for the acquisition of Women, Infants, and Children (WIC) Administrative Data

2. Authority

The authority for the Census Bureau to enter into this Agreement is 13 U S C § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code

The authority for the ADHS to share WIC data and enter into this Agreement is Section 17 of the Child Nutrition Act of 1966, 42 U S C § 1786 and implementing regulations at 7 CFR Part 246. WIC regulations at 7 CFR 246 26(e) limit the disclosure of WIC recipient information to those directly connected with the administration or enforcement of the WIC program. The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the WIC program because Census will provide to the state copies of its tabulations of the data for the state to use in administering its WIC program

3. Terms and Conditions

Pursuant to this Agreement ADHS will transfer records to the Census Bureau from the administration of WIC, hereinafter referred to as "the state data" and as described in Attachment A of this Agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. Maintaining confidentiality of these data is guaranteed under Title 13 U S C , Section 9, and the Privacy Act of 1974. Only Census Bureau staff and Special Sworn Status (SSS) researchers will have access to the data. Any data, records, or other information shared through this research Agreement will be protected from unauthorized disclosure and will be used solely for statistical and outreach purposes. When the Census Bureau publicly releases information related to this research, it will not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

3.1 ADHS agrees to:

- 3.1.1 Transfer to the Census Bureau via secure FTP (File Transfer Protocol) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of WIC for the years 2004—2020, as described in Attachment A. Data provided after the expiration of this Agreement will be provided through a new Agreement executed by both parties.
- 3.1.2 Provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this Agreement; including a record layout, record count, and record length.
- 3.1.3 Allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers will not contain any state data or direct identifiers.
- 3.1.4 Research projects exploring whether the administrative records represent the same individuals in survey or census households may need access to name data. Access to name data will only be granted through approval by the Census Bureau Data Stewardship

MEMORANDUM OF UNDERSTANDING

ADHS MOU No. HU550021 / Census Bureau Agreement # 0094-2015-NFE-07

Executive Policy Committee Researchers will not have access to Social Security Numbers.

- 3 1 5 Allow the Census Bureau staff and Special Sworn Status (SSS) researchers to use the state data at the Processing Sites listed in Section 4 of this Agreement for the projects listed in Attachment B or those approved in writing by both parties
- 3 2 The Census Bureau agrees.
- 3 2 1 To grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this Agreement and only for the projects listed in Attachment B or those approved in writing by both parties
- 3 2 2 To provide ADHS, within six (6) months of the receipt of acceptable data quality and acceptable file layouts, research by-product tabulations of the state data linked to the American Community Survey. These tabulations will describe the demographic and household characteristics of residents who are likely to be eligible for WIC, but who do not participate in the program and compare those characteristics to the characteristics of the eligible participants
- 3 2 3 To provide ADHS a copy of the linked file containing all data elements used to describe demographic and household characteristics mentioned in section 3 2 2 of this document (including WIC, American Community Survey, other surveys and administrative records) for all likely eligible participants, plus census block identifier. The state will analyze these data through geo-mapping to identify concentrations of likely eligible non-participants in order to locate areas of opportunity for outreach, potential clinic locations, and their proximity to vendors, schools, public services, and other potential partners; as well as to compare the characteristics of eligible participants to non-participants
- 3 2 4 To allow ADHS the opportunity to review and provide comments, clearance, or rejection of pre-publication copies of any report or other document containing information derived from the state data pertaining to WIC and resulting from use under this Agreement of the state data. If no response is received from ADHS within thirty (30) days from delivery of pre-publication documents to ADHS, the Census Bureau shall send a reminder notice to ADHS. If no response is received within three (3) business days from delivery of the reminder notice, ADHS will be deemed to have approved the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this Agreement

4. Contacts

The parties mutually agree that the following named individual is to be designated as custodian of the files on behalf of the Census Bureau and will be personally responsible for the observance of all conditions of use, and for the establishment and maintenance of security arrangements to prevent unauthorized use, as specified in the Agreement. The Census Bureau agrees to notify ADHS within fifteen (15) days of any changes of custodianship.

4 1 Custodian.

J. Trent Alexander
Data Custodian
U S Census Bureau
4600 Silver Hill Road, 2K133
Washington DC 20233
Telephone. (301) 763-9810
Email. j.trent.alexander@census.gov

MEMORANDUM OF UNDERSTANDING

ADHS MOU No. HU550021 / Census Bureau Agreement # 0094-2015-NFE-07

- 4.2 Processing Sites:
Bowie Computer Center
Suitland Federal Center
Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the Agreement on behalf of ADHS and the Census Bureau, respectively:

- 4.3 State agency POC:

Karen Sell
Bureau Chief
Bureau of Nutrition and Physical Activity
Arizona Department of Health Services
150 N 18th Ave Ate 310
Phoenix AZ 85007
Telephone: (602) 364-0687
Email: karen.sell@azdhs.gov

- 4.4 Census Bureau POC.

Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
U S Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
Telephone. (301) 763-5757
Email: amy.b.ohara@census.gov

5. Resolution of Disagreements

Should disagreement arise on the interpretation of the provisions of this Agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If Agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

MEMORANDUM OF UNDERSTANDING

ADHS MOU No. HU550021 / Census Bureau Agreement # 0094-2015-NFE-07

6. Approvals / Signatures

For: US CENSUS BUREAU



Ron Jarmin
Assistant Director
Research and Methodology Directorate of the U S Census Bureau

6/19/15

Date

For: ARIZONA DEPARTMENT OF HEALTH SERVICES



Authorized Signature

Rebecca O'Brien, Acting Chief Proc. Officer

Print Name & Title

6/30/15

Date

MEMORANDUM OF UNDERSTANDING

ADHS MOU No. HU550021 / Census Bureau Agreement # 0094-2015-NFE-07

Attachment A

Data Elements

1. Data Requirements

Data from the administration of WIC for the years 2004—2020 will include, when available:

- 1 1 Case unit identifiers,
- 1 2 Complete case unit address history (residence, mailing),
- 1 3 History of benefit amounts received (monthly),
- 1 4 Income reporting requirement (simplified reporting, change reporting, etc),
- 1 5 Gross income (monthly),
- 1 6 Net income (monthly),
- 1 7 Eligibility and denial information,
- 1 8 Identifiers for individuals in case units, and
- 1 9 The following information on individuals in a case unit:
 - 1 10 Name
 - 1 11 Social Security Number
 - 1 12 Relationship to primary recipient
 - 1 13 Race
 - 1.14 Hispanic origin/Ethnicity
 - 1 15 Sex
 - 1 16 Date of birth
 - 1 17 Education
 - 1 18 Employment
 - 1.19 Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)
 - 1 20 History of membership in case unit

MEMORANDUM OF UNDERSTANDING

ADHS MOU No. HU550021 / Census Bureau Agreement # 0094-2015-NFE-07

Attachment B

Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records

The U.S. Census Bureau administers multiple household surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data; explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of state programs in the American Community Survey (ACS), the Current Population Survey (CPS) and the Survey of Income and Program Participation (SIPP). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing and reaching likely eligible non-participants of WIC

Persons with a high probability of being eligible for WIC can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative WIC data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether WIC take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System (PVS) uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records. However, coverage for some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research and Planning for the 2020 Census

The Census Bureau intends to test and potentially use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau intends to use state program information, along with data from federal, state, and private sources to pursue the following four research initiatives, leading to improvements in quality and efficiency of 2020 Census operations:

MEMORANDUM OF UNDERSTANDING

ADHS MOU No. HU550021 / Census Bureau Agreement # 0094-2015-NFE-07

- 4 1 Validating and enhancing the Master Address File (MAF);
 - 4 1 1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File
- 4 2 Designing and assigning resources to carry out the 2020 Census;
 - 4 2 1 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning
- 4 3 Unduplicating public, private, and census lists; and
- 4 4 Imputing missing data
 - 4 4 1 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources

Data quality will be explored using 2010 decennial census data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census to assess accuracy based on the level of aggregation.

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
WOMEN, INFANTS, AND CHILDREN ADMINISTRATIVE DATA
FROM
THE COLORADO DEPARTMENT OF PUBLIC HEALTH & ENVIRONMENT

Agreement No. 0094-2015-NFE-06

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Department of Public Health & Environment of the State of Colorado for the acquisition of Women, Infants, and Children (WIC) Administrative Data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the Department of Public Health & Environment of the State of Colorado to share WIC data and enter into this agreement is Section 17 of the Child Nutrition Act of 1966, 42 U.S.C. § 1786 and implementing regulations at 7 CFR Part 246. WIC regulations at 7 CFR 246.26(e) limit the disclosure of WIC recipient information to those directly connected with the administration or enforcement of the WIC program. The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the WIC program because Census will provide to the state copies of its tabulations of the data for the state to use in administering its WIC program.

3. TERMS AND CONDITIONS

Pursuant to this agreement, the Department of Public Health & Environment of the State of Colorado, hereinafter referred to as "the state program agency", will transfer records to the Census Bureau from the administration of WIC, hereinafter referred to as "the state data" and as described in Attachment A of this agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. Maintaining confidentiality of these data is guaranteed under Title 13 U.S.C, Section 9, and the Privacy Act of 1974. Only Census Bureau staff and Special Sworn Status (SSS) researchers will have access to the data. Any data, records, or other information shared through this research agreement will be protected from unauthorized disclosure and will be used solely for statistical purposes. When the Census Bureau publicly releases

information related to this research, it will not be disclosed in individually-identifiable form and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state agency agrees:

- i. To transfer to the Census Bureau via secure FTP (File Transfer Protocol) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of WIC for the months and years from October 2011–December 2016, as described in Attachment A.
- ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, and record length.
- iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers will not contain any state data or direct identifiers.

Research projects exploring whether the administrative records represent the same individuals in survey or census households may need access to name data. Access to name data will only be granted through approval by the Census Bureau Data Stewardship Executive Policy Committee. Researchers will not have access to Social Security Numbers.

- iv. To allow the Census Bureau staff and Special Sworn Status (SSS) researchers to use the state data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

- i. To grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.
- ii. To provide the state agency, within six (6) months of the receipt of acceptable data quality and acceptable file layouts, research by-product tabulations of the state data linked to the American Community Survey. These tabulations will describe the demographic and household characteristics of residents who are likely to be eligible for WIC, but who do not participate in the program.
- iii. To allow the state agency the opportunity to review and provide comments, clearance, or rejection of pre-publication copies of any report

or other document containing information derived from the state data pertaining to WIC and resulting from use under this agreement of the state data. If no response is received from the state agency within thirty (30) days from delivery of pre-publication documents to the state agency, the Census Bureau shall send a reminder notice to the state agency. If no response is received within three (3) business days from delivery of the reminder notice, the state agency will be deemed to have approved the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this agreement.

4. CONTACTS

The parties mutually agree that the following named individual is to be designated as custodian of the files on behalf of the Census Bureau and will be personally responsible for the observance of all conditions of use, and for the establishment and maintenance of security arrangements to prevent unauthorized use, as specified in the agreement. The Census Bureau agrees to notify the state agency within fifteen (15) days of any changes of custodianship.

Custodian: J. Trent Alexander
Data Custodian
U.S. Census Bureau
4600 Silver Hill Road, 2K133
Washington DC 20233
(301) 763-9810
j.trent.alexander@census.gov

Processing Sites: Bowie Computer Center
Suitland Federal Center
Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the state agency and the Census Bureau, respectively:

State agency POC: Erin Ulric
WIC Director
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, Colorado 80246
303.692.2452
erin.ulric@state.co.us

Census Bureau POC: Amy O'Hara
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement will terminate five (5) years following the date on which it becomes effective. If, at the end of five (5) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties will review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, **in order to determine whether it should be revised, renewed or canceled**. The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state agency.

Notwithstanding all other provisions of this agreement, the Parties agree that:

- a. This agreement may be amended at any time by written mutual consent of both parties.
- b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

The parties to this agreement envision that upon expiration or termination of this agreement, that the parties will execute a new agreement permitting the Census Bureau continued use of the original state data. For this reason, the original state data will be retained by the Census Bureau after expiration or termination of this agreement, unless the state agency notifies the Census Bureau in writing that the original state data are not to be retained by the Census Bureau past the expiration or termination of this agreement. If, upon expiration or termination of this agreement, the state agency notifies the Census Bureau Point of Contact in writing that the original state data covered by this agreement are not to be retained by the Census Bureau, the data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

If, upon expiration or termination of this agreement, the Census Bureau retains the original state data, Census Bureau researchers will cease and desist all use of the state data until such time that a new agreement is executed which permits the use of the state data by Census Bureau researchers. The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

7. CONFIDENTIALITY

WIC regulations at 7 CFR 246.26(e) protect the confidentiality of the state data. The Census Bureau also assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r3 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO (Chief Information Officer), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices*." Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state agency contacts to discuss the actions and potential remedies regarding the incident.

8. APPROVALS



Ron Jarmin
Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

(Date)



Erin Ulric
WIC Director
Colorado Department of Public Health and Environment

(Date)

Attachment A: Data Elements

Data from the Colorado Department of Public Health and Environment administration of WIC for the months and years October 2011 – December 2016 will include, when available:

1. Data Requirements

Item	Requested data item from Census Bureau:	What Colorado Department of Public Health and Environment WIC data extract can provide:
a	Case Unit Identifier	Forward Facing Family Id (FID)
b	Complete case unit address history (residence, mailing)	Primary and Mailing address
c	History of benefit amounts received (monthly)	Redeemed food Instruments (Fis) for month
d	Income reporting requirement	We can provide the reporting period for their gross income (Bi-weekly, Monthly, Weekly, Annual, Semi-Monthly)
e	Gross Income	Gross Income
f	Net Income	N/A
g	Eligibility and denial information	Eligibility is confirmed with the certification record, denial is recorded when the participant is terminated ineligible
h	Identifiers for individuals in case units	Forward Facing Member ID (PID)
i.i	Name	First and last name
i.ii	SSN	N/A
i.iii	Relationship to primary recipient	We can only provide the mother relationship if the participant came in as an infant.
i.iv	Race	Race
i.v	Hispanic origin/Ethnicity	Ethnicity
i.vi	Sex	Sex
i.vii	Date of Birth	Date of Birth
i.viii	Education	We can provide education only when on a participant who is pregnant, postpartum or breastfeeding.
i.ix	Employment	N/A
i.x	Monthly income sources (earnings, TANF, SSI, SSA, UI, general assistance, other)	Monthly income sources
i.xi	History of membership	We can provide certification history

Attachment B: Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records

The U.S. Census Bureau administers multiple household surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of state programs in the American Community Survey (ACS), the Current Population Survey (CPS) and the Survey of Income and Program Participation (SIPP). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing likely eligible non-participants of WIC

Persons with a high probability of being eligible for WIC can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative WIC data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether WIC take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System (PVS) uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records. However, coverage for

some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research and Planning for the 2020 Census

The Census Bureau intends to test and potentially use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau intends to use state program information, along with data from federal, state, and private sources to pursue the following four research initiatives, leading to improvements in quality and efficiency of 2020 Census operations:

- A. validating and enhancing the Master Address File (MAF);¹
- B. designing and assigning resources to carry out the 2020 Census;²
- C. unduplicating public, private, and census lists; and
- D. imputing missing data.³

Data quality will be explored using 2010 decennial census data to assess the quality and utility of household roster, location, and demographic characteristics data.

Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information.

Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census to assess accuracy based on the level of aggregation.

1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.

2 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.

3 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
WOMEN, INFANTS, AND CHILDREN ADMINISTRATIVE DATA
FROM
THE COLORADO WIC PROGRAM
OF
THE COLORADO DEPARTMENT OF PUBLIC HEALTH & ENVIRONMENT

Agreement No. [2064-FY19-NFE-0244]

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Department of Public Health & Environment of the State of Colorado, Colorado WIC Program, for the acquisition of Women, Infants, and Children (WIC) Administrative Data.

2. AUTHORITY

The authority for the Census Bureau to enter into this Agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the Department of Public Health & Environment of the State of Colorado to share Colorado WIC Program data and enter into this Agreement is Section 17 of the Child Nutrition Act of 1966, 42 U.S.C. § 1786 and implementing regulations at 7 CFR Part 246. WIC regulations at 7 CFR 246.26(d)(1)(ii) limit the disclosure of WIC recipient information to those directly connected with the administration or enforcement of the WIC program. The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on October 24, 2017, has determined that the Census Bureau is directly connected with the administration of the WIC program because Census will provide to the state copies of its research tabulations for the state to use in administering its WIC program.

3. TERMS AND CONDITIONS

Pursuant to this Agreement, the Department of Public Health & Environment of the State of Colorado, Colorado WIC Program, hereinafter referred to as "the state program agency", will transfer records to the Census Bureau from the administration of WIC, hereinafter referred to as "the state data" and as described in Attachment A of this Agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. To the extent provided by law, confidentiality of this data will be maintained under Title 13 U.S.C, Section 9, and the Privacy Act. To the extent provided by law, only Census Bureau staff and those Special Sworn Status (SSS) researchers participating in the projects will have access to the data. Access shall be limited to the minimum number of individuals necessary. Any data, records, or other information shared through this research Agreement are protected from unauthorized disclosure and shall be used solely for statistical purposes and not for program or administrative enforcement.

When the Census Bureau publicly releases information related to this research, it will not be disclosed in individually-identifiable form that permits the identification of any individual respondents, businesses, organizations, or institutions, and results will meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. To the extent provided by law, the Census Bureau will recognize the state program agency as the owner of the original data in the form that it is delivered to the Census Bureau, prior to its integration with confidential Census data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state program agency agrees:

- i. To transfer to the Census Bureau via secure FTP (File Transfer Protocol) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of WIC for the years 2017-2023, as described in Attachment A.
- ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this Agreement; including active participant definitions, a record layout, record count, and record length.
- iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers will not contain any state data or direct identifiers.
- iv. To allow the Census Bureau staff and Special Sworn Status (SSS) researchers to use the state data at the Processing Sites listed in Section 4 of this Agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this Agreement.

b. The Census Bureau agrees:

- i. To the extent provided by law, to grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this Agreement and only for the projects listed in Attachment B or those approved in writing by both parties.
- ii. To provide the state program agency with a copy of data tabulations that the Census Bureau will create for Census research purposes. Specifically, the Census Bureau will provide the state program agency with data tabulations based on at least two consecutive calendar years of state program participation administrative records linked to annual responses to the American Community Survey (ACS). Data tabulations shall include estimated rates of program eligibility and access/participation for the state overall and by various demographic, economic, and household characteristics and by county when the data allow. It also will include distributions across the same characteristics both for program participants and for those who are estimated to be eligible but do not participate. The data tabulations will be delivered either within six (6) months from the date that the state administrative records are processed and provided to Census

Bureau research staff, or from the date that relevant years of the ACS become available, whichever is later.

- iii. To the extent permitted by law, allow the state program agency the opportunity to review and provide comments of pre-publication copies of any report or other document containing information derived from the state data pertaining to WIC and resulting from use under this Agreement of the state data. If no comments are received from the state program agency within fourteen (14) days from delivery of pre-publication documents to the state program agency, the Census Bureau shall send a reminder notice to the state program agency. If no comments are received within three (3) business days from delivery of the reminder notice, the state program agency will be deemed to have no comment regarding the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this Agreement.

4. CONTACTS

The parties mutually agree that the Census Bureau will appoint a designated "Custodian" of the files, who will in a representative capacity, comply with all of the designated provisions of this Agreement on behalf of the Census Bureau; including observance of all conditions of use, and for the establishment and maintenance of security arrangements, as specified in the Agreement to prevent unauthorized use. The parties mutually agree that the following locations are designated for data processing, analysis, and storage within the Census Network:

Sites: Bowie Computer Center or Other Approved Census Computer Centers
 Suitland Federal Center
 Federal Statistical Research Data Centers
 Census Approved Cloud Services

The parties mutually agree that the following named individuals will be designated as points of contact for the Agreement on behalf of the state program agency and the Census Bureau, respectively:

State program agency POC:

Alex Erkenbeck
Data and Evaluation Manager, Nutrition Services Branch
Colorado Department of Public Health
4300 Cherry Creek Dr. South
Denver, CO 80246
(303) 692-2465
alexandria.erkenbeck@state.co.us

Census Bureau POC:

Michael Berning
Assistant Division Chief
Data Acquisition and Curation
Economic Reimbursable Surveys Division
U.S. Census Bureau
4600 Silver Hill Rd
Washington, DC 20233

(301) 763-2028
michael.a.berning@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This Agreement is effective on the date on which it is signed by both parties. The Agreement will terminate five (5) years following the date on which it becomes effective. If, at the end of five (5) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties will review this Agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the Agreement, in order to determine whether it should be revised, renewed or canceled. The review will be conducted by the Census Bureau's Assistant Director for Economic Programs and the state program agency.

Notwithstanding all other provisions of this Agreement, the Parties agree that:

- a. This Agreement may be amended at any time by written mutual consent of both parties.
- b. Either party may terminate this Agreement upon thirty (30) days written notice to the other party.

To the extent permitted by federal law, the original state data received from the state program agency will be retained by the Census Bureau after receipt for a maximum of two (2) years, unless the state program agency establishes a different timetable as clarified, when necessary, in Section 3, Terms and Conditions. Any revisions to the data retention timetable after the execution of this Agreement will be stated in writing in an amendment to this Agreement. The original state data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this Agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this Agreement.

To promote organizational transparency, and in support of data discovery for current and future research projects, the U.S. Census Bureau posts non-sensitive data documentation to public-facing websites. This documentation, such as a record layout or data dictionary, can include file descriptions, variable lists, variable labels and valid values for each variable.

6. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this Agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty

(30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this Agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, must be sworn in under 13 U.S.C. Section 23(c), and shall have access to any pertinent books, documents, papers and records of the parties to this Agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

The Census Bureau will promptly consider and adjudicate, in accordance with Federal law, claims which may arise for damages of any nature arising out of a Census Bureau act under this Agreement. Such adjudication will be pursued under the Federal Tort Claims Act, 28 U.S.C. Section 2671 et seq., the Federal Employees Compensation Act, 5 U.S.C. Section 8101 et seq., or such other legal authority as may be pertinent. The U.S. Department of Justice shall determine the appropriate venues for any litigation arising under this Agreement.

7. CONFIDENTIALITY

A. IT Security

State Statute at section 24-73-101 et seq., C.R.S., protects the confidentiality of the state data that contains personal identifying information, as well as WIC regulations at 7 CFR 246.26(e). The Census Bureau will comply with all federal laws applicable to the privacy or security of data received pursuant to this Agreement. As a federal agency, the Census Bureau is not subject to state laws, however the Census Bureau will comply with the requirements of applicable state laws to the extent that they do not conflict with the Census Bureau's requirements under federal law.

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, United States Code. The data provided under this Agreement are confidential under 13, U.S.C. § 9. Per the Federal Cybersecurity Enhancement Act of 2015, these data are also protected from cybersecurity risks through screening of the systems that transmit the data. Upon receipt, all data acquired as a result of this Agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60r1.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r4 "Recommended Security Controls for Federal Information Systems and Organizations," as well as Special Publication 800-37r1 "Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach." The Census Bureau IT Security Program is reviewed annually by

the Department of Commerce Office of the CIO (Chief Information Officer), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "*Standards for Security Categorization of Federal Information and Information Systems*" and NIST Special Publication 800-60r1 "*Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices.*" Security controls and subsequent assessments are to be completed based on the final categorization.

Cloud providers must be approved for at least moderate level information through the GSA FedRAMP process prior to acquiring any services. Census Bureau identifies, assesses and authorizes use based on the published FedRAMP results and an assessment of any Census Bureau (customer provided) controls implemented to protect the infrastructure and data. Security reporting on cloud providers is reported to the Department of Commerce on a regular basis under FISMA.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum M-17-12. Known or suspected losses of protected data are to be reported within one (1) hour of its discovery to the Bureau of the Census Computer Incident Response Team (BOC CIRT) who will report as required to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau becomes aware of a known breach of the State Data, the Census Bureau will contact the state program agency contacts to discuss the actions and potential remedies regarding the incident.

B. Disclosure Avoidance Review of Statistical Products

Title 13, Section 9 of the United States Code (U.S.C.) requires the Census Bureau to keep confidential the information collected from the public under the authority of Title 13. Section 214 of Title 13, U.S.C., and Sections 3551, 3559 and 3571 of Title 18, U.S.C., provide for the imposition of penalties of up to five years in prison and/or up to \$250,000.00 in fines for wrongful disclosure of confidential census information.

Disclosure avoidance is the process for protecting the confidentiality of data, as required under Title 13 U.S.C. A disclosure of data occurs when someone can use published statistical information to identify an individual who has provided confidential information under a pledge of confidentiality. For data tabulations, the Census Bureau uses disclosure avoidance procedures to modify or remove the characteristics that put confidential information at risk for disclosure. Although a published table may appear to show information about a specific individual, the Census Bureau has taken steps to disguise or suppress the original data, while making sure the results are still useful. The techniques used by the Census Bureau to protect confidentiality in tabulations vary, depending on the type of data.

Noise infusion is the Census Bureau's preferred disclosure avoidance technique. By policy, noise infusion is applied to all data products that are reported with geographies smaller than a state. Noise infusion may be required for microdata releases, depending on the characteristics of the microdata and the specific variables that are to be released. Data that cannot be publicly released may still be analyzed within the Federal Statistical

Research Data Centers (FSRDCs) by individuals who have Special Sworn Status; the results of such analyses must still go through a disclosure avoidance process prior to being publicly released.

The parties understand that Title 13 confidentiality protection and disclosure avoidance techniques apply to all work described in this Agreement. The disclosure avoidance disclosure methods are defined by the Census Bureau which has the responsibility of carrying out that work. Accordingly, upon completion of the tabulation, the data produced must be reviewed by the Census Bureau to ensure that no identifiable Title 13 data are or may be disclosed. Should the Census Bureau's Disclosure Review Board (DRB) determine that the requested statistical product does or reasonably could result in such disclosure, then the data product will be modified prior to approval for release to the party(ies) to this Agreement. The DRB must approve before a research product can be released to an individual who does not have SSS and a need to know, or moved to a computer not approved for controlled data according to Census' existing policies and procedures.

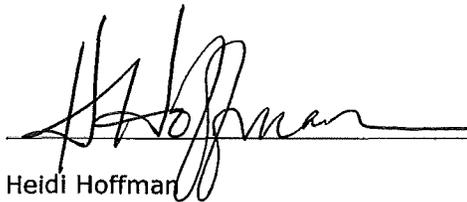
8. APPROVALS



6/26/19

Kevin Deardorff
Chief, Economic Reimbursable Surveys Division
U.S. Census Bureau

(Date)



7/17/19

Heidi Hoffman
WIC Director, Colorado WIC Program
Colorado Department of Public Health and Environment

(Date)

Attachment A: Data Elements

1. Data Requirements

Monthly data from the administration of WIC for the years 2017-2023 will include, when available:

- a. Case unit identifiers,
- b. Active Participant definitions,
- c. Complete monthly case unit address history (residence, mailing),
- d. Monthly Benefits data (any of the available: benefits received date, benefits amount issued/received, and benefit amount redeemed),
- e. Income reporting requirement (simplified reporting, change reporting, etc.),
- f. Income (monthly),
- g. Eligibility and denial information,
- h. Identifiers for individuals in case units, and
- i. The following information on individuals in a case unit:
 - i. Name
 - ii. Case unit/main contact phone number
 - iii. Relationship to primary recipient
 - iv. Recipient or Caretaker phone number
 - v. Race
 - vi. Hispanic origin/Ethnicity
 - vii. Sex
 - viii. Date of birth
 - ix. Gross income (monthly)
 - x. Net Income (monthly)
 - xi. Monthly income source (earnings, TANF, SSI, SSA, UI, general assistance, other)
 - xii. Education
 - xiii. Employment

Attachment B: Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records

The U.S. Census Bureau administers multiple household and business surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of state programs in the American Community Survey (ACS), the Current Population Survey (CPS) and the Survey of Income and Program Participation (SIPP). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing WIC participants and likely eligible non-participants of WIC

WIC data linked to ACS data can provide characteristic information for women, infants, and children participating in the WIC program. Additionally, infants and children with a high probability of being eligible for WIC can be estimated using ACS information on family structure, reported income, and public assistance.¹ The estimated eligible infants and children can be matched to the administrative WIC data to determine who is estimated to be eligible but not participating in the program, helping agencies determine unmet need. The project results can help state agencies improve outreach efforts. This research helps the Census Bureau better understand their survey and census data.

3. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System (PVS) uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records. However, coverage for

¹ Eligible pregnant and breastfeeding women cannot be identified in ACS data.

some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research, Testing and Operations for the 2020 Census

The Census Bureau intends to test and use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau is using state program information, along with data from federal, state, and private sources to pursue the following four research initiatives leading to the integration of these data to augment or replace Census operations:

- A. validating and enhancing the Master Address File (MAF);²
- B. designing and assigning resources to carry out the 2020 Census;³
- C. unduplicating public, private, and census lists; and
- D. imputing missing data.⁴

To determine the feasibility of incorporating the administrative records data into Census operations, the data will be explored using 2010 decennial census data and intercensal test data to assess the quality and utility of household roster, location, and demographic characteristics data. Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information. Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census and intercensal test data to assess accuracy based on the level of aggregation. Research and testing includes simulations with 2010 Census data as well as using these data in operational site tests with the end goal of eventually incorporating the data into decennial census operations.

5. Leveraging Administrative Data to Drive Program Evaluation and Enhance Policy Outcomes

The U.S. Census Bureau is expanding its Data Linkage Infrastructure to increase the opportunity for cross-organizational research and program evaluation across the Federal Statistical Research Data Center network and/or via Remote Network Access. The acquisition and use of Administrative Data is becoming increasingly central to the U.S. Census Bureau's mission. Like many agencies in the Federal Statistical System, the Census Bureau uses Administrative Data to reduce inquiries on the public, to promote the efficient use of federal funds, and to produce and improve statistics on the American population and economy. As Census and other Federal Statistical Agencies successfully

² Examples of possible Census Bureau uses include updating and evaluating the Master Address File.

³ Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.

⁴ Examples of possible Census Bureau uses include Item Imputation and count Imputation using information from a composite of public and private data sources.

integrate Administrative Data, they acquire and use the data within the context of comprehensive data stewardship programs that ensure strong confidentiality and privacy protections.

The Census Bureau Linkage Infrastructure (CBLI) enables data discovery and secure analytic access for policy analysis, program evaluation, and research. CBLI relies on the Census Bureau's authority to access government records and collect data for statistical purposes, and leverages the Census Bureau's data stewardship culture, policies, and practices.

revised

MEMORANDUM OF UNDERSTANDING
THROUGH WHICH
THE U.S. CENSUS BUREAU IS ACQUIRING
SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM ADMINISTRATIVE DATA
FROM
THE VIRGINIA DEPARTMENT OF SOCIAL SERVICES

Agreement No. 0094-2015-PAY-02

1. PARTIES AND PURPOSE

This Memorandum of Understanding establishes an agreement between the U.S. Census Bureau (Census Bureau) and the Virginia Department of Social Services for the acquisition of Supplemental Nutrition Assistance Program (SNAP) Administrative Data.

2. AUTHORITY

The authority for the Census Bureau to enter into this agreement is 13 U.S.C. § 6, which permits the Census Bureau to access, by purchase or otherwise, information to assist the Census Bureau in the performance of duties under Title 13, United States Code.

The authority for the Virginia Department of Social Services to share SNAP data and enter into this agreement is Section 17 of the Food and Nutrition Act of 2008 (Act), 7 U.S.C., § 2026. The Food and Nutrition Act of 2008 limits the use of SNAP recipient information to those directly connected with the administration or enforcement of the provisions of the Act, specifically Section 11(e)(8)(A) of the Act (7 U.S.C. 2020(e)(8)(A)). The Department of Agriculture Food and Nutrition Service, through a Memorandum of Record signed on August 18, 2014, has determined that the Census Bureau is directly connected with the administration of the SNAP program because Census will provide to the state copies of its tabulations of the data for the state to use in administering its SNAP program.

3. TERMS AND CONDITIONS

Pursuant to this agreement, the Virginia Department of Social Services, hereinafter referred to as "the state program agency", will transfer records to the Census Bureau from the administration of SNAP, hereinafter referred to as "the state data" and as described in Attachment A of this agreement. All data that the state program agency agrees to provide the Census Bureau remains confidential. Maintaining confidentiality of these data is guaranteed under Title 13 U.S.C, Section 9, and the Privacy Act of 1974. Only Census Bureau staff and Special Sworn Status (SSS) researchers will have access to the data. Any data, records, or other information shared through this research agreement will be protected from unauthorized disclosure and will be used solely for statistical purposes. When the Census Bureau publicly releases information related to this research, it will not be disclosed in individually-identifiable form and results will

meet Census Bureau disclosure avoidance guidelines. The Census Bureau will link the state data to census data, survey data and administrative records data. The Census Bureau will use the linked data for research and operations to improve data collection and record linkage methods for surveys and decennial censuses. The Census Bureau will also utilize the state data to provide new and improved estimates of population characteristics related to program participation.

a. The state agency agrees:

- i. To transfer to the Census Bureau via secure FTP (File Transfer Protocol) or appropriately encrypted CD-ROM or DVD-ROM, data from the administration of SNAP for the years 2009–2016, as described in Attachment A.
- ii. To provide adequate documentation and support of transferred files for the Census Bureau to be able to interpret the data for the uses permitted in this agreement; including a record layout, record count, record length and data dictionary.
- iii. To allow the Census Bureau to use its record linking processes to assign, where possible, person and address identifiers to each record in the state data. Record linkage identifiers will not contain any state data or direct identifiers.

Research projects exploring whether the administrative records represent the same individuals in survey or census households may need access to name data. Such access would only be granted through approval by the Census Bureau Data Stewardship Executive Policy Committee. Researchers will not have access to Social Security Numbers.

- iv. To allow the Census Bureau staff and Special Sworn Status (SSS) researchers to use the state data at the Processing Sites listed in Section 4 of this agreement for the projects listed in Attachment B and for additional projects as permitted by Section 3.b.i of this agreement.

b. The Census Bureau agrees:

- i. To grant access to the state data only to Census Bureau staff and SSS researchers at the Processing Sites listed in Section 4 of this agreement and only for the projects listed in Attachment B or those approved in writing by both parties.
- ii. To provide the state agency, within six (6) months of the receipt of acceptable data quality and acceptable file layouts, selected tabulations of the state data linked to the American Community Survey. These tabulations will describe the demographic and household characteristics of residents who are likely to be eligible for SNAP, but who do not participate in the program.

- iii. To allow the state agency the opportunity to review and provide comments, clearance, or rejection of pre-publication copies of any report or other document containing information derived from the state data pertaining to SNAP and resulting from use under this agreement of the state data. If no response is received from the state agency within thirty (30) days from delivery of pre-publication documents to the state agency, the Census Bureau shall send a reminder notice to the state agency. If no response is received within three (3) business days from delivery of the reminder notice, the state agency will be deemed to have approved the delivered documents for publication and/or distribution to persons outside of the Census Bureau staff authorized to use the state data under this agreement.

4. CONTACTS

The parties mutually agree that the following named individual is to be designated as custodian of the files on behalf of the Census Bureau and will be personally responsible for the observance of all conditions of use, and for the establishment and maintenance of security arrangements to prevent unauthorized use, as specified in the agreement. The Census Bureau agrees to notify the state agency within fifteen (15) days of any changes of custodianship.

Custodian: J. Trent Alexander
Data Custodian
U.S. Census Bureau
4600 Silver Hill Road, 2K133
Washington DC 20233
(301) 763-9810
j.trent.alexander@census.gov

Processing Sites: Bowie Computer Center
Suitland Federal Center
Census Bureau Research Data Centers

The parties mutually agree that the following named individuals will be designated as points of contact for the agreement on behalf of the state agency and the Census Bureau, respectively:

State agency POC: Nikole Cox
SNAP Manager
Virginia Department of Social Services
801 E. Main St. Richmond, VA 23002
(804) 726-7270
Nikole.cox@dss.virginia.gov

Census Bureau POC: Amy O'Hara
Center Chief
Center for Administrative Records Research and Applications
U.S. Census Bureau
4600 Silver Hill Road
Washington, DC 20233
(301) 763-5757
amy.b.ohara@census.gov

The parties agree that if there is a change regarding the information in this section, the party making the change will notify the other party in writing of such change.

5. FUNDING

The total amount to be paid by the Census Bureau to the Virginia Department of Social Services via Electronic Funds Transfer (EFT) is \$10,000.00. Funding is provided to reimburse the state program agency for resources needed to set up and complete the data extraction as described in Attachment C. This Agreement is considered to be a firm commitment.

6. ACCOUNTING DATA

State Agency Accounting Data:

Agency Location Code: **765**

Appropriation No.:

CAN:

DUNS No.: **015571326**

EIN: **1540959533A2**

Total Amount:

Control Number:

Census Bureau Accounting Data:

Agency Location Code: **13-04-0001**

Project Code: **6410A00Z95**

TAS: **013 2015 2016 0450 000**

Business Event Type Code (BETC): **DISB**

Funds Expiration: **09-30-2016**

Funds Cancellation Date: **09-30-2021**

Organization Code: **11-09-0094-00-00-00-00**

DUNS No.: **929955383**

EIN: **52-0204537**

Total Amount: **\$10,000.00**

Agreement No.: **0094-2015-PAY-02**

7. FINANCIAL POINTS OF CONTACT

State Agency Financial Contact: Michael Gump
Chief Financial Officer
Virginia Department of Social Services
801 East Main Street
(804) 726-7223
michael.gump@dss.virginia.gov

Census Bureau Financial Contact: Sandi Walters
Division Chief, Finance
U.S. Census Bureau
4600 Silver Hill Road
Washington, DC 20233
(301) 763-9398
Sandi.walters@census.gov

8. DURATION OF AGREEMENT, AMENDMENTS, AND MODIFICATIONS

This agreement is effective on the date on which it is signed by both parties. The agreement will terminate five (5) years following the date on which it becomes effective. If, at the end of five (5) years, the parties wish to continue the relationship, they must execute a new agreement.

The parties will review this agreement at least once every three (3) years, or whenever a Federal statute is enacted that materially affects the substance of the agreement, in order to determine whether it should be revised, renewed or canceled. The review will be conducted by the Census Bureau's Associate Director for Research and Methodology and the state agency.

Notwithstanding all other provisions of this agreement, the Parties agree that:

- a. This agreement may be amended at any time by written mutual consent of both parties.
- b. Either party may terminate this agreement upon thirty (30) days written notice to the other party.

The parties to this agreement envision that upon expiration or termination of this agreement, that the parties will execute a new agreement permitting the Census Bureau continued use of the state data. For this reason, the original state data will be retained by the Census Bureau after expiration or termination of this agreement, unless the state agency notifies the Census Bureau in writing that the original state data are not to be retained by the Census Bureau past the expiration or termination of this agreement. If, upon expiration or termination of this agreement, the state agency notifies the Census Bureau Point of Contact in writing that the original state data covered by this agreement

are not to be retained by the Census Bureau, the data will be expunged from Census Bureau systems, so long as such expungement is not inconsistent with federal records retention law.

If, upon expiration or termination of this agreement, the Census Bureau retains the original state data, Census Bureau researchers will cease and desist all use of the state data until such time that a new agreement is executed which permits the use of the state data by Census Bureau researchers. The dissemination and use of publicly-released reports, articles, and other products derived in whole or in part from the state data will not be discontinued due to the expiration or termination of this agreement. Furthermore, the use of state records with linkage identifiers and state data linked to other data as part of the projects described in Attachment B will not be discontinued due to expiration or termination of this agreement.

9. RESOLUTION OF DISAGREEMENTS

Should disagreement arise on the interpretation of the provisions of this agreement, or amendments and/or revisions thereto, that cannot be resolved at the operating level, the area(s) of disagreement shall be stated in writing by each party and presented to the other party for consideration. If agreement on interpretation is not reached within thirty (30) days, the parties shall forward the written presentation of the disagreement to respective higher officials for appropriate resolution.

Under the Inspector General Act of 1978, as amended, 5. U.S.C. App. 3, a review of this agreement may be conducted at any time. The Inspector General of the Department of Commerce, or any of his or her duly authorized representatives, shall have access to any pertinent books, documents, papers and records of the parties to this agreement, whether written, printed, recorded, produced, or reproduced by any mechanical, magnetic or other process or medium, in order to make audits, inspections, excerpts, transcripts, or other examinations as authorized by law.

10. CONFIDENTIALITY

The Census Bureau assumes an obligation to keep all data received from other federal and state agencies and commercial entities in confidence, and to use the data for statistical purposes only in accordance with the provisions of Title 13, U.S.C. Section 9. Upon receipt, all data acquired as a result of this interagency agreement will be treated as if they have, at a minimum, protection at the appropriate risk level in accordance with NIST FIPS 200 and Special Publication 800-60.

The Census Bureau complies with all current NIST standards and publications in accordance with Title III of the E-Government Act of 2002 (PL 107-347). All systems are fully assessed against NIST Special Publication 800-53r3 "*Recommended Security Controls for Federal Information Systems and Organizations*," as well as Special Publication 800-37r1 "*Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*." The Census Bureau IT Security Program is reviewed annually by the Department of Commerce Office of the CIO (Chief Information Officer), as well as the Department of Commerce Office of Inspector General, as part of the oversight responsibilities.

All information and information systems are categorized in accordance with NIST FIPS 199 "Standards for Security Categorization of Federal Information and Information Systems" and NIST Special Publication 800-60 "Guide for Mapping Types of Information and Information Systems to Security Categories: (2 Volumes) - Volume 1: Guide Volume 2: Appendices." Security controls and subsequent assessments are to be completed based on the final categorization.

The Census Bureau maintains a policy regarding the reporting of, and response to losses of protected data in accordance with OMB Memorandum 6-19 and M-07-16. Known or suspected losses of protected data are to be reported within one (1) hour to the United States Computer Emergency Readiness Team (US CERT). Once the Census Bureau becomes aware of a known breach of the state data, the Census Bureau will contact the identified state agency contacts to discuss the actions and potential remedies regarding the incident.

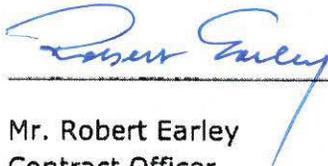
11. APPROVALS



2/19/15

Ron Jarmin
Assistant Director
Research and Methodology Directorate of the U.S. Census Bureau

(Date)



2.23.15

Mr. Robert Earley
Contract Officer
Virginia Department of Social Services

(Date)

Attachment A: Data Elements

1. Data Requirements

Data from the administration of SNAP for the years 2009—2016 will include, when available:

- a. Case unit identifiers,
- b. Complete case unit address history,
- c. History of benefit amounts received (monthly),
- d. Income reporting requirement (simplified reporting, change reporting, etc.),
- e. Gross income (monthly),
- f. Net income (monthly),
- g. Eligibility and denial information,
- h. Identifiers for individuals in case units, and
- i. The following information on individuals in a case unit:
 - i. Name
 - ii. Social Security Number
 - iii. Relationship to primary recipient
 - iv. Race
 - v. Hispanic origin/Ethnicity
 - vi. Sex
 - vii. Date of birth
 - viii. Education
 - ix. Employment
 - x. Monthly income by source (earnings, unearned income, TANF, SSI, SSA, UI, general assistance, other)
 - xi. History of membership in case unit
 - xii. SNAP program participation status or active status within a case

Attachment B: Description of Approved Research Projects

1. Evaluation and Improvement of Demographic Surveys Using State and Federal Administrative Records

The U.S. Census Bureau administers multiple household surveys that are designed to characterize the program participation characteristics of the U.S. population. This project will evaluate the accuracy of such survey data, explore the determinants of misreporting and the impact of misreporting on estimates of population characteristics. This project will also evaluate and improve current procedures for editing and/or imputing survey data related to program participation. The project will also use the state data to investigate survey frame coverage, survey effects and survey non-response.

This project will focus on evaluating and improving the measurement of state programs in the American Community Survey (ACS), the Current Population Survey (CPS) and the Survey of Income and Program Participation (SIPP). In the case of SIPP, this evaluation will also inform the redesign of the SIPP survey instrument that is currently underway.

This project will include additional studies that use administrative records from state and federal programs (including the state data) and/or Census Bureau survey data, and that can inform the Census Bureau about the quality of its data products and the feasibility of using administrative records to improve Census Bureau data products. These additional studies could include linkages to surveys conducted by the National Center for Health Statistics (NCHS), and linkages to datasets created from joint statistical projects between the Census Bureau and NCHS, the USDA Economic Research Service, the Bureau of Justice Statistics, the Department of Health and Human Services and the Department of Veterans Affairs.

2. Characterizing likely eligible non-participants of SNAP

Persons with a high probability of being eligible for SNAP can be modeled using ACS data on household composition and reported income. The modeled eligible persons can be matched to the administrative SNAP data to determine who participated in the program. This research is important for the Census Bureau as it permits a greater understanding of whether SNAP take-up is uniformly distributed across demographic and geographic groups. Disparities among persons with different languages spoken at home, race or ethnic identification, or urbanicity could affect interpretations of Supplemental Poverty Measure estimates. This research also benefits FNS and state agencies by assessing the characteristics of persons with unmet needs. The project results in aggregate information that state agencies can use to improve outreach efforts.

3. Improve Census Bureau Record Linkage Methods

The Census Bureau's Person Identification Validation System (PVS) uses administrative records from a variety of sources to assign, where possible, unique person identifiers to each record in its surveys, Censuses and administrative records. However, coverage for

some populations may be incomplete in the PVS. Incomplete coverage in the PVS would have important implications for the Census Bureau's ability to evaluate and improve its data products using administrative records. The use of the state program administrative records will permit an assessment of the coverage completeness in PVS while improving upon coverage in the PVS of the populations participating in state programs.

4. Research and Planning for the 2020 Census

The Census Bureau intends to test and potentially use data from many sources, including public and private sources, to design and conduct the 2020 Census. The Census Bureau intends to use state program information, along with data from federal, state, and private sources to pursue the following four research initiatives, leading to improvements in quality and efficiency of 2020 Census operations:

- A. validating and enhancing the Master Address File (MAF);¹
- B. designing and assigning resources to carry out the 2020 Census;²
- C. unduplicating public, private, and census lists; and
- D. imputing missing data.³

Data quality will be explored using 2010 decennial census data to assess the quality and utility of household roster, location, and demographic characteristics data.

Disagreement observed in content across sources will be analyzed to develop approaches such as modeling or business rules to resolve conflicting information.

Administrative records will be assessed to tabulate data at various levels of geography including the housing unit, block, tract, and state levels. These tabulations will be compared to the 2010 Census to assess accuracy based on the level of aggregation.

1 Examples of possible Census Bureau uses include updating and evaluating the Master Address File.

2 Examples of possible data uses include simulating a targeted address canvassing, modeling to determine data collection modes, modeling to predict self-response probabilities, simulating non-response follow-up designs, directed advertising campaigns, and special enumeration operations planning.

3 Examples of possible Census Bureau uses include item imputation and count imputation using information from a composite of public and private data sources.

Attachment C: Statement of Work Funding SNAP Data Extraction

Statement of Work

for the

**U.S. Census Bureau Funding of the Data Extraction by the
Virginia Department of Social Services for**

Supplemental Nutrition Assistance Program Administrative Data

Under the referenced MOU [0094-2015-PAY-02] through which the Census Bureau is acquiring Supplemental Nutrition Assistance Program (SNAP) Administrative Data from the Virginia Department of Social Services (VDSS), Census Bureau funding reimburses VDSS efforts to extract SNAP data for the years 2009-2016, by providing funds to complete the following tasks:

Task 1 – Analysis, Design, and Initial File Delivery

Through this task, the Virginia Department of Social Services has agreed to provide SNAP recipient data to the US Census Bureau. This data exists in the DSS Data Warehouse, using a dimensional model. While there is no charge for the data, a considerable amount of design, programming, and testing work is needed to extract the data elements needed by the Census Bureau and create a series of “flat files” for transmission to them. We will extract SNAP case and client details for 2009 through 2013, create a series of files, review the files for accuracy, and provide them to the Census Bureau. This task is expected to be completed by the end of 2014 with delivery of all 2009 – 2013 files.

Task 2 – Delivery of 2014 Data

Through this task, the 2014 data can be provided after CY2014 is complete. This is expected to be completed by mid-February, 2015.

Task 3 – Delivery of 2015 Data

Through this task, the 2015 data can be provided after CY2015 is complete. This is expected to be completed by mid-February, 2016.

Task 4 – Delivery of 2016 Data

Through this task, the 2016 data can be provided after CY2016 is complete. This is expected to be completed by mid-February, 2017.