

Congress of the United States

Washington, DC 20510

September 25, 2017

Dr. Ron Jarmin, Ph.D.
Acting Director
U.S. Census Bureau
4600 Silver Hill Road
Washington, DC 20233

Dear Dr. Jarmin:

We write to request information about the Census Bureau's (hereinafter "Bureau") plan to use federal, state, and local administrative records for address canvassing and enumeration efforts in the upcoming 2020 Decennial Census (hereinafter "Census").¹ While limited use of these records could reduce fraud, prevent errors, and control costs associated with carrying out the Census, we are concerned overreliance on potentially outdated or inaccurate administrative records may result in an inaccurate Census. For example, it appears the Census Bureau plans to use databases maintained by the Social Security Administration (SSA), which is known to contain inaccuracies and flaws.

For the 2020 Census, the Bureau plans to use a SSA database known as the Numident,² along with other government records, to count an estimated 4.1 percent of households.³ In lieu of sending staff to conduct in-person follow-ups for an estimated 3.9 percent of homes, the Bureau also plans to use these records as the basis for assuming the homes are vacant.⁴ Finally, the Bureau will use these records for imputation—a statistical process to fill in missing responses using available data.⁵

The Bureau's use of information in the Numident is problematic because SSA often fails to update it when a person dies and frequently marks living people as deceased. Since 2006, the SSA Office of Inspector General (OIG) released more than a

¹ U.S. CENSUS BUREAU, 2020 CENSUS OPERATIONAL PLAN: A NEW DESIGN FOR THE 21ST CENTURY 25 (SEPT. 2016), available at <https://www2.census.gov/programs-surveys/decennial/2020/program-management/planning-docs/2020-oper-plan2.pdf>.

² The "Numident" is an acronym for "Numerical Index File." This is SSA's computer database file of an abstract of information contained in an application for a U.S. Social Security number (Form SS-5).

³ ELIZABETH M. GRIECO, U.S. CENSUS BUREAU, THE USE OF ADMINISTRATIVE RECORDS AND THIRD-PARTY DATA IN THE 2020 CENSUS: AN OVERVIEW (Mar. 23, 2017) (briefing with S. Oversight Staff).

⁴ *Id.*

⁵ U.S. CENSUS BUREAU, 2020 CENSUS OPERATIONAL PLAN: A NEW DESIGN FOR THE 21ST CENTURY 25 (SEPT. 2016), available at <https://www2.census.gov/programs-surveys/decennial/2020/program-management/planning-docs/2020-oper-plan2.pdf>.

dozen reports questioning the accuracy of death information in Numident.⁶ For example, in 2015, the SSA OIG found 6.5 million living people listed in the Numident as more than 112 years old. There are only three known residents of the United States of that age.⁷ The Obama Administration disagreed with many of the OIG's recommendations, which would have addressed these problems.⁸ However, the questionable accuracy of the information contained in the Numident database remains because underlying problems remain unaddressed.

More recently, the SSA OIG reported in April 2017 that 188,000 people in California were "likely deceased but had no death information in the Numident."⁹ While SSA corrected these errors after learning of the mistake, the report states significant deficiencies still remain in the accuracy of Numident database. The deficiencies highlighted in that report could result in errors in the eight percent of households the Bureau estimates it will count or skip using administrative records.¹⁰

A recent Government Accountability Office (GAO) review also underscores concerns about the Bureau's use of administrative records for the Census. GAO reviewed the Bureau's efforts to address potential limitations on the use of administrative records, and the planned use of untested records. GAO's review found the Bureau planned to implement a two-stage quality assurance program for administrative record data sets. However, GAO did not conduct a test of the proposed quality assurance program to assess its in-field ability to identify poor quality records.¹¹ Further, GAO's review found the use of administrative records for fraud prevention purposes was not fully tested.¹²

The 2020 Decennial Census is important for ensuring the equitable apportionment of government spending, the number of Representatives serving each community, and the overall value of the demographic information. While GAO found the Bureau's plans for administrative records should help prevent misuse or inaccuracy, that finding was contingent on the Bureau executing and enacting the plans and safeguards in an effective

⁶ *AUDIT REPORTS INVOLVING NUMIDENT*, SOC. SEC. ADMIN. OFF. OF THE INSPECTOR GEN., https://oig.ssa.gov/search/site/numident?f%5B0%5D=bundle%3Aaudit_report (last visited Sept. 25, 2017).

⁷ SOC. SEC. ADMIN. OFF. OF THE INSPECTOR GEN., A-06-14-34030, *AUDIT REPORT: NUMBERHOLDERS AGE 112 OR OLDER WHO DID NOT HAVE A DEATH ENTRY ON THE NUMIDENT* (Mar. 2015), *available at* http://oig.ssa.gov/sites/default/files/audit/full/pdf/A-06-14-34030_0.pdf.

⁸ *Id.*

⁹ SOC. SEC. ADMIN. OFF. OF THE INSPECTOR GEN., A-06-14-24138, *AUDIT REPORT: MATCH OF CALIFORNIA DEATH INFORMATION AGAINST SOCIAL SECURITY ADMINISTRATION RECORDS* (Apr. 2017), *available at* <http://oig.ssa.gov/sites/default/files/audit/full/pdf/A-06-14-24138.pdf>.

¹⁰ ELIZABETH M. GRIECO, U.S. CENSUS BUREAU, *THE USE OF ADMINISTRATIVE RECORDS AND THIRD-PARTY DATA IN THE 2020 CENSUS: AN OVERVIEW* (Mar. 23, 2017) (briefing with S. Oversight Staff) at 15.

¹¹ The Gov't Accountability Office, GAO-17-664, *2020 Census: Bureau is Taking Steps to Address Limitations of Administrative Records*.

¹² *Id.*

and timely manner. The Bureau must ensure the count reflects the number of living people in the United States to the greatest extent possible. While we understand this process is designed to reduce the number of temporary workers hired for in-person follow-ups, there is too much at stake for too high a percentage of the population to be miscounted.

Given the unreliability of information in the Numident and other government records, we are concerned about the use of administrative records for actual counting or for determining which households do not require in-person follow up. Therefore, we ask the Census Bureau provide the following documents and information:

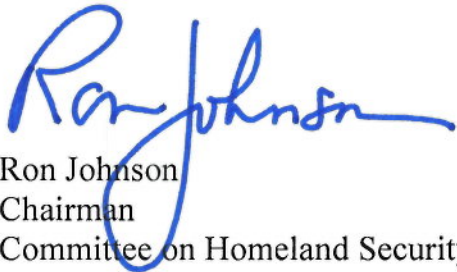
1. All analyses or assessment procedures the Bureau intends to use to verify the accuracy of any administrative record data set prior to its use for either enumeration or address canvassing purposes.
2. A list of all of the administrative record data sets that have been tested by the Bureau as of September 1, 2017.
3. All analyses or assessments conducted by the Bureau in testing its quality assurance process for administrative record data sets.
4. All analyses or assessments conducted or commissioned by the Census Bureau regarding the reliability of the data contained in the Numident.
5. All analyses or assessments conducted or commissioned by the Census Bureau regarding the reliability of the data contained in other administrative records, including but not limited to the Indian Health Service Patient Registration File, the National Change of Address File, the Assisted Renters Public and Indian Housing Center Database, the Supplemental Nutrition Assistance Program, and Temporary Assistance to Needy Families information.
6. An updated estimate of the number of households the Census Bureau plans to count or skip based on administrative records.
7. All legal analyses, memoranda, or opinions regarding whether the use of administrative records for counting the population constitutes imputation.

We ask you please provide this information as soon as possible but no later than October 9, 2017.

Mr. Ron Jarmin, Ph.D.
September 25, 2017
Page 4

If you have any questions about this request, please ask your staff to contact Jennifer Selde of Chairman Johnson's staff at 202-224-4751 or Patrick Hartobey of Chairman Gowdy's staff at 202-225-5074. Thank you for your attention to this matter.

Sincerely,



Ron Johnson
Chairman
Committee on Homeland Security
and Governmental Affairs
United States Senate



Trey Gowdy
Chairman
Committee on Oversight
and Government Reform
U.S. House of Representatives

cc: The Honorable Elijah Cummings
Ranking Member
Committee on Oversight and Government Reform
U.S. House of Representatives

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