Administrative Records Handbook

A Compiliation of Policies, Processes, and Procedures

USCENSUSBUREAU

Helping You Make Informed Decisions

Table of Contents

Section

1

1. Introduction

The Administrative Records (ADREC) infrastructure supports a wide variety of U.S. Census Bureau programs for which administrative records from outside sources are essential. This handbook serves as a basic reference on administrative-record use for Census Bureau staff and special sworn associates. An overview of the ADREC process, section outlines, and definitions of key terms follow. Major topics include:

Handbook Overview

What is an Administrative Record?

What is an ADREC Project?

Which ADREC Projects are within the scope of this handbook?

1.1 Handbook Overview

1.1.1 ADREC Infrastructure

The ADREC infrastructure includes five component processes:

Initial Project Development

Project Review and Approval

Agreement Negotiation and Data Acquisition

Data Access and Agreement Administration

Project Implementation

This handbook describes the component processes and general policy and guidance supporting the ADREC infrastructure.
Figure 1 illustrates the ADREC processes.

Figure 1 ADREC Handbook and Process
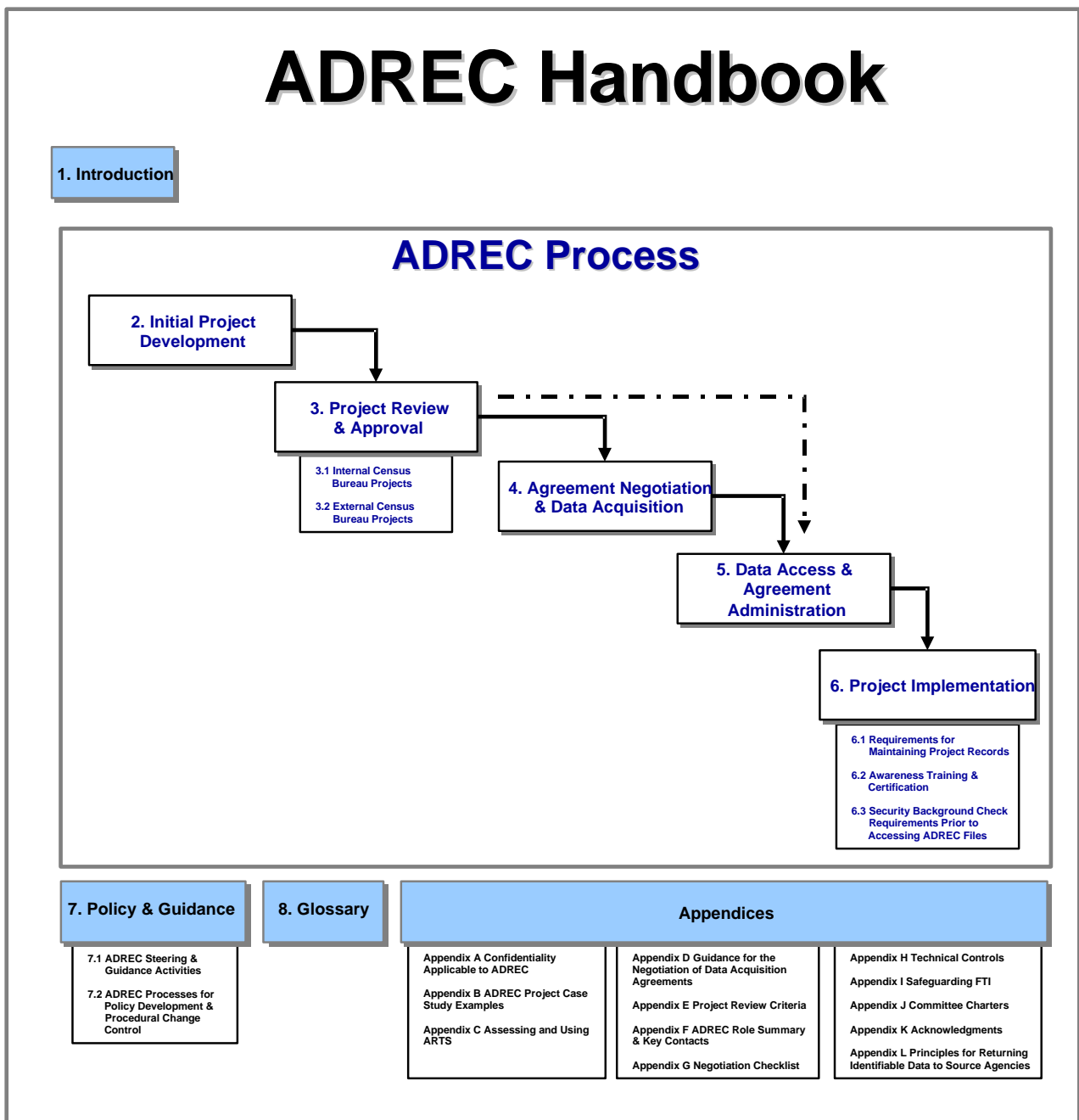
The remainder of this handbook provides specific procedures, individual roles and responsibilities, and policies associated with the ADREC process. It is organized as follows:

Section 2, **Initial Project Development**, provides guidance on the initial conception and development of an ADREC project prior to its submission for formal review.

Section 3, **Project Review and Approval**, explains how to document a proposed, new project, and describes the review and approval process. Both internal, reimbursable, and joint Census Bureau projects and external projects are described here.

Section 4, **Agreement Negotiation and Data Acquisition,** describes the process by which ADREC data files are formally acquired by the Census Bureau to support projects.

Section 5, **Data Access and Agreement Administration,** describes the process that ensures compliance with the terms of Census Bureau agreements with other agencies. It also describes the process by which ADREC data are managed, tracked, and released to authorized Census Bureau users.

Section 6, **Project Implementation,** describes the requirements for maintaining accurate project records, meeting source agency reporting requirements, completing annual awareness training, and conducting appropriate background investigations.

Section 7, **Policy and Guidance,** describes how policy issues should be developed and decided, and how changes to this handbook will be made.

Section 8, **Glossary** of administrative records terms.

The twelve appendices in this handbook include:

Appendix A, Confidentiality Applicable to Administrative Records

Appendix B, Administrative Records Project Case Study Examples

Appendix C, Accessing and Using the Administrative Records Tracking System (ARTS)

Appendix D, Guidance for the Negotiation of Data Acquisition Agreements

Appendix E, Project Review Criteria

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Appendix I, Safeguarding and Protecting Federal Tax Returns and Return Information—Guidelines for Census Bureau Officers, Employees, and Persons with Special Sworn Status

Appendix J, Committee Charters

Appendix K, Acknowledgements; Identification of key contributors to the development of this handbook

Appendix L, Principles for Returning Identifiable Data to Source Agencies (under development)

1.1.2 Primary Groups Supporting ADREC Infrastructure

Several primary groups support the ADREC Infrastructure. They include:

		Membership
Census Bureau ADREC Project Review Team (See Section 3 for more details.)	Reviews and approves internal, reimbursable, or joint Census Bureau ADREC projects before they begin.	▪ Project Review Coordinator, Center for Economic Studies (CES) ▪ Administrative Records Coordinator (ARC), Office of Analysis and Executive Support (OAES) ▪ Representative, Information Technology Security Office ▪ Assistant Division Chief for Data Management, Data Integration Division (DID) ▪ Representative, Economic Planning and Coordination Division Representative
CES Proposal Selection Committee (See Section 3 for more details.)	Reviews and approves external Census Bureau ADREC projects before they begin.	▪ CES Managers and Staff ▪ Members of the Census Bureau ADREC Project Review Team
Data Stewardship Executiv Policy Committee (See Section 7 for more details)	Sets ADREC and related policy. Considers appeals to Census Bureau ADREC Project Review Team decisions.	▪ Members of the Census Bureau Executive Staff
Committee on Administrative Records Policies and Procedures (CARPP) (See Section 7 for more details.)	Develops ADREC policy options and makes recommendations to the Stewardship Committee. Also manages change control on ADREC Handbook.	▪ ARC (OAES) ▪ Other Staff as assigned by the Executive Staff

1.2 What is an Administrative Record?

Administrative records and administrative record data refer to microdata records contained in files collected and maintained by administrative or program agencies and commercial entities. Government and commercial entities maintain these files for the purpose of administering programs and providing services. Administrative records are distinct from systems of information collected exclusively for statistical purposes, such data from censuses and surveys that are produced under the authority of Titles 13 or 15 of the United States Code (U.S.C.). For the most part, the Census Bureau draws upon administrative records developed by federal agencies. To a lesser degree, it may use information from state, local, and tribal governments, as well as commercial entities.

The primary sources of ADREC data used by the Census Bureau are the Internal Revenue Service (IRS), Social Security Administration (SSA), Bureau of Labor Statistics, Centers for Medicare and Medicaid Services (CMS), United States Postal Service (USPS), and Bureau of Economic Analysis. To obtain these data, the Census Bureau must adhere to a number of regulatory requirements.

1.2.1 Types of Administrative Records Information

Information contained in administrative records used by the Census Bureau generally falls under one of three types: person, business, or locator (including addresses).

 "Person"/demographic data are data about people or households, including counts, and demographic and housing characteristics. Personal identifiers include individual and householder names and social security numbers (SSN). These two types of identifiers allow identification of specific individuals. Demographic (person/household) statistics are the collection of numerical aggregates (macrodata) that describe the social, economic, and other characteristics of human populations.

"Business"/federal economic data refer to data collected on economic entities that produce goods or services.

The Census Bureau's Economic Programs use the business concept broadly to include commercial enterprises and noncommercial organizations or institutions, employers and nonemployers, and private-sector and government entities. The business concept *excludes* private households with paid employees whenever those employees primarily support the operation of a residence.

A business organized as a sole proprietorship and the individual who owns it are one and the same. Therefore, administrative-records information about such a business also identifies the owner. The Economic Programs' statistical activities are concerned exclusively with the entity's business activities and characteristics. The disposition of information about sole proprietorships, including name, address, and taxpayer and other identification numbers, is economic rather than personal.

Economic statistics are the collection of numerical aggregates (macrodata) that describe the operating, financial, ownership, and other characteristics of businesses. When compiled for the purpose of describing populations of economic units, this concept includes data about the demographic characteristics of legal entities (natural or legal persons) that own businesses.

"Locator" or "address" data are data that could be used alone or in combination with other data to locate a specific person or business. These identifiers include

latitude and longitude points, telephone numbers, addresses, and address information. Address information describes one or more data fields that denote the physical or mailing location of an individual or business entity. Address information includes, but is not limited to, USPS rural and "STAR" route designators, P.O. Box or Postal Drawer designators, addresses with street name and number; apartment, unit, or lot number; post office and postal state information and ZIP Codes.

1.2.2 Commingled Data

When administrative record data are incorporated with other Census Bureau data (or other administrative record data), the result is a "commingled dataset." The concept of commingled data is particularly important to individuals using the Business Register, because this frame includes Federal Tax Returns and Return Information (FTI).

FTI refers to all data about businesses or people received from the IRS. Census Bureau projects using FTI are subject to provisions of the Internal Revenue Code — Title 26, U.S.C., as well as the Census Bureau's authorizing statute — Title 13, U.S.C. Files that contain any FTI, along with Title 13 protected data, are referred to as "commingled" datasets.

A Census Bureau project involves FTI if it uses as its starting point:

> Individual-level record information from a file obtained by the Census Bureau from IRS, or tax or earnings data from the SSA;

> Individual-level record information contained in the Business Register, formerly called the Standard Statistical Establishment List (SSEL); or

> Individual-level record information contained in any census or survey that uses the Business Register as its universe or frame.

Most projects undertaken in the Economic Directorate will make use of FTI. Even a limited use of FTI makes the entire file subject to Title 26 provisions, as well as all IRS reviews, approvals, and protections.

1.3 What is an ADREC Project?

The Census Bureau tracks, manages, and reports on its ADREC activities both internally and externally at a "project" level. An ADREC project is a project that makes use of administrative records data. An example of an ADREC project is the "Current Population Survey — SSN Validation."

In general, a project is a set of activities that has a distinct mission and clear starting and ending points. Projects have a life cycle that proceeds from conception to planning, execution, and termination. There is generally a single point of contact for each project. A project is often part of a broader program and is a building block in the design and execution of program goals. Dependent relationships may exist between projects. For example, one project may require output from another.[1]

For additional information regarding project management principles, literature, and project management activities taking place at the Census Bureau, please visit the Census Project Management Repository, which can be accessed from the following Intranet Web site: http://cww2.census.gov/atozIndex.asp#c.

1.3.1 Project Types

Properly designating project type is important. Some project types may require additional reporting or extra safeguards. One, and only one, of the following types can classify each ADREC project.

Internal projects are authorized by Title 13 and managed by Census Bureau employees, including those at the Census Bureau under the Intergovernmental Personnel Act Mobility Program. Although ideas for conducting internal projects may not originate within the Census Bureau, they are funded solely by the Census Bureau's appropriated funds.

External projects are those that predominately meet a Title 13 purpose, but are managed by individuals granted special sworn status (SSS) by the Census Bureau. They are typically funded by external sources. Such projects are usually conducted at the Census Bureau's Center for Economic Studies or a Census Bureau Research Data Center.

Joint projects predominately meet a Title 13 purpose while also meeting that of another federal statistical agency. A team consisting of a representative from each contributing agency typically manages joint projects. Both agencies contribute data and other resources to the project.

Reimbursable projects are those for which the Census Bureau receives payment (in part or in total) from a customer for products or services rendered.

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[1] This definition is based on ESI International's Project Management Terms: A Working Glossary, J. Leroy, editor (Arlington, VA, 1997)

1.3.2 Project Status

Correctly identifying project status is important for two reasons. All new administrative records projects must be reviewed and approved through the Administrative Records Tracking System (ARTS) before they can begin. Also, inaccurately reporting project status – such as indicating a *one-time* project when the project is *recurring* – may require additional reviews and approvals that would otherwise be unnecessary. ADREC projects may fall into more than one of the following status categories.

New projects are subject to the Census Bureau review and approval process described in Section 3 of the handbook. A project is considered new if:

It is an original idea for a project that has not already been approved, or

It is an approved project whose scope, status, methodology, data linkage strategies, data sets, or data uses change.

Recurring or cyclical projects are typically defined as a set of discrete production activities that are periodically repeated within a program. The project cycles are defined at their inception as having specific starting and ending points with the associated activities repeated periodically. Predefined production cycles could be quarterly, annually, biennially, or some other period. As long as the methodologies, types of data, and data linkage strategies used to create a product are unchanged over time, the project is not "new," despite the fact that it occurs more than one time. Examples include production of the annual Intercensal Population Estimates and maintenance of the Business Register. Information about the project must be updated in ARTS for each cycle, but no additional review and approval are required, unless a change occurs which would characterize subsequent activities as a new project.

One-time projects are not recurring or cyclical. From their inception, it is anticipated that these projects will be executed only once. Although research projects are often one-time activities, successful research projects are sometimes incorporated into production activities. If this occurs, the project would be considered "new," requiring it to be reviewed and approved under the process described in Section 3.

Baseline projects include any internal or reimbursable administrative records project that was active in November 2000 or reported to the IRS during the 1999-2000 Safeguard Review. Baseline projects are not subject to additional internal Census Bureau review. However, they must be included in ARTS, because the Census Bureau is required to report on them as long as they remain active.

Approved projects are either in the baseline or have subsequently been formally reviewed and approved using the Census Bureau project review process specified in Section 3 of this handbook. All approved projects are included in ARTS.

Active projects are those in which activities are occurring at the present time. The only projects that should be active at any given time are those in the "baseline" or subsequently approved through the Census Bureau's project review process. Active projects are not subject to additional internal Census Bureau review but must be included and updated as needed in ARTS.

1.4 Which ADREC Projects are Within the Scope of This Handbook?

Projects that use ADREC data with use and access constraints must adhere to the processes within this handbook. Projects that use ADREC data without any use or access constraints may voluntarily participate in the processes within this handbook.

There are two subclasses of administrative record data, those with data supplier-related constraints on access and use and those without. This distinction is necessary, because the Census Bureau must ensure it meets all legal obligations imposed on it by the suppliers of administrative records. When the Census Bureau collects information from individuals or businesses, that information is usually subject to Title 13 confidentiality restrictions. All Census Bureau employees and individuals with SSS swear an oath to uphold the confidentiality of information that they access. However, information we receive from external sources often comes with restrictions on its access and use that go beyond the provisions of Title 13.

Administrative records information falls into five categories based on legal access and use restrictions. Those projects falling in the fourth and fifth categories are subject to the ADREC Handbook processes. Those in the first three categories are not.

Figure 2 ADREC Categories

		Review and Tracking
		Optional
		X
		X
		X

Publicly available files are those that the public could obtain as readily as the Census Bureau. These files are obtained without any restrictions on subsequent access or use. Examples include listed telephone numbers and the information found in the common core of data maintained by the Governments Division. Information about some of these files is provided in ARTS. Including information about the new files in ARTS is recommended, but not required.

Title 13, Section 301(g) or Section 9 covers the vast majority of data in the Census Bureau's possession. The former applies to foreign trade data and the latter to all other data collected under the authority of Title 13. An example of an administrative records file covered by Title 13, Section 9 is the Delivery Sequence File from the USPS. Information about some of these files is provided in ARTS.

Some administrative records data in the Census Bureau's possession are protected by the data supplier's own statutes or regulations, or by language in an agreement with the data supplier. Sometimes the data also are protected by Title 13. For a fuller discussion on determining whether Title 13 applies, see Appendix A, "Confidentiality Applicable to Administrative Records." A significant example of data protected by both Title 13 and a data supplier's statute is all FTI, whether received from the IRS directly or from the SSA. Additional examples include the American Business Information File or vital records from the National Center for Health Statistics.

The ADREC Handbook processes cover all ADREC projects and datasets maintained by the Census Bureau. However, only those projects that use data in categories four and five noted in Figure 2 are required to adhere to these processes. Those using data in the other categories may choose to do so in order to enhance corporate information sharing and coordination.

2. Initial Project
Development

3. Project Review
& Approval

4. Agreement
Negotiation
& Data Acquisition

5. Data Access
& Agreement
Administration

6. Project
Implementation
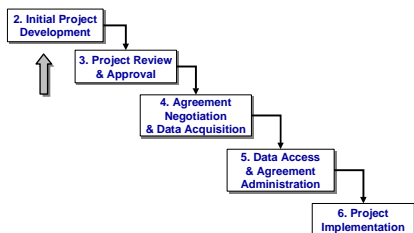
Section

2

2. Initial Project Development

Prior to formal project review, activities are by definition somewhat informal. Project Contacts (PCs) entertain ideas for projects and possibilities for new data sources and funding. The steps set forth in this section provide the flexibility necessary to initiate discussions with outside agencies within parameters that protect the overall interests of the U.S. Census Bureau.

As an idea evolves through this initial project development stage, the PC will prepare a formal project proposal for review according to the process articulated in Section 3 of this handbook, "Project Review and Approval." Example case studies are provided in Appendix B. The formal process for acquiring administrative record data is described in Section 4, "Agreement Negotiation and Data Acquisition."

2.1 Process Steps

1. **The PC begins with an idea.** In discussions with others at the Census Bureau or colleagues at outside agencies, the PC has a preliminary idea for conducting a project that will require administrative record (ADREC) data.

2. **The PC must determine the availability of data.** The Administrative Records Tracking System (ARTS), which provides an inventory of the ADREC data acquired by the Census Bureau, will help the PC establish whether the data are currently available. (See Appendix C, "Accessing and Using the Administrative Records Tracking System.") If further information about the data are required, the PC should contact one or more of the following divisions, depending on the type of data required:

   If "person data" or demographic data are required, the PC should contact the Data Integration Division (DID) Data Management Staff. DID will determine whether the data are currently available and if the data agreement or Memorandum of Understanding negotiated for those data permit the proposed use. In some cases, the proposed use may be reasonably close to the uses explicitly agreed upon, but further
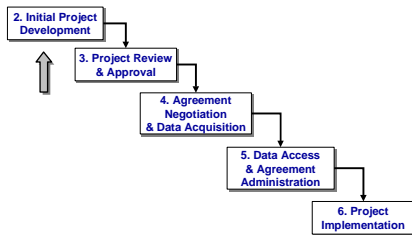
clarification will be needed. DID will make this determination and will be responsible for contacting the source agency to secure clarification.

If "business data" or federal economic data are required, the Economic Planning and Coordination Division (EPCD) is responsible for negotiations and acquisitions. People working within the Economic Directorate already have access to the Business Register and other sources of economic information and can determine data availability themselves. However, EPCD's involvement is required in three situations:

- If the PC works outside the Economic Directorate and requires federal economic data;

- If the PC wishes EPCD to consider the acquisition of additional federal economic data; or

- If the PC needs EPCD to verify whether the proposed project falls within the scope of acceptable uses of the data.

If locator data or address data are needed, the PC should contact the Geography Division, which is responsible for acquiring address data to support the Master Address File (MAF). If the PC is investigating alternative sources of address records, the Geography Division will need to determine whether those records have potential for enhancing the MAF.

If the project requires data outside the scope of the categories noted above (for example, state-level business files), the PC should contact the Census Bureau's Administrative Records Coordinator (ARC) in OAES. In these unusual instances, the ARC will work with the PC, DID, and EPCD to determine how best to conduct initial discussions with the appropriate source agencies.

3. **If the data are available, a formal proposal must be submitted.** If the data are available at the Census Bureau and usable for the potential project, the PC develops a formal project proposal and submits it for review according to the process set out in Section 3.

4. **If the data are not available, informal discussions with a source agency can begin.** If the PC and the divisions noted above determine that the necessary data are <u>not</u> available, the PC may initiate informal discussions with potential source agencies in most cases. The following agencies are exceptions:
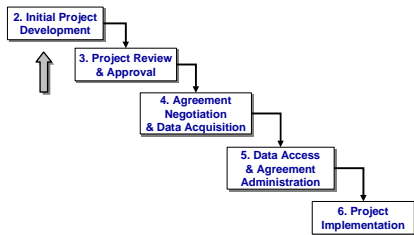
- The United States Postal Service (USPS),
- The Internal Revenue Service (IRS),
- The Social Security Administration (SSA),
- The Centers for Medicare and Medicaid Services (CMS),
- The Bureau of Labor Statistics (BLS), and
- The Bureau of Economic Analysis (BEA).

The Census Bureau has a strong corporate interest in these agencies, because they provide ADREC data that impact a broad range of programs at the Census Bureau. Before discussing source data or funding with these agencies, the PC should contact the ARC in OAES. The ARC will provide some context to assist the PC in discussions with that agency. Negotiations may be underway with the agency to support other projects. Or the ARC may be aware of other non-project activities, such as an IRS data safeguard review or previous problems with data received from the source agency. If there are any questions about the status of the Census Bureau's relationship with another agency, the PC should contact the ARC.

If the source agency is not one of those noted above or the ARC has been consulted, the PC may begin informal discussions. It is important that the PC conduct discussions with source agencies on an informal basis. The source agency must understand that the PC is not making commitments on behalf of the Census Bureau. The PC should not be working with the source agency to draft a Memoranda of Understanding or other contractual documents. Guidance on conducting both these informal discussions and the formal negotiations for acquiring the data can be found in Appendix D, "Guidance for the Negotiation of Data Acquisition Agreements."

Initial informal discussions may involve costs and deliverables required by the source agency, the data elements required, potential product outcomes, methodology, and timing. The PC then enters the information regarding these discussions into the Administrative Records Tracking System (ARTS).

5. **After informal discussions, a formal proposal must be submitted.** The PC develops a formal project proposal and submits it to the ADREC project review process as described in Section 3. The project must be submitted before any formal negotiations with a source or funding agency can take place. (See Section 4, "Agreement Negotiation and Data Acquisition.")
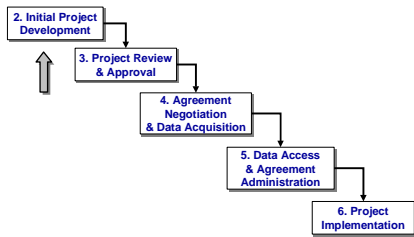
2.2 Documentation Requirements

1. The PC and others involved in discussions with source or funding agencies enter information on agency discussions into ARTS.

2. The PC prepares a formal proposal and submits it via ARTS to the ADREC project review process.
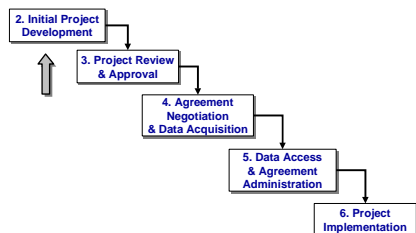
2.3 Supporting Roles and Responsibilities

The following table provides a summarized view of each participant's chief function in the initial project development stage.

					ARC
Develop initial idea for new project	X				
Determine availability/stated uses for required data	X	X	X	X	X
Notify ARC as required about approaching source/funding agencies with which the Census Bureau has strong corporate relationships (USPS, IRS, SSA, BLS, BEA, CMS)	X				
Conduct informal discussions with potential source agencies	X				
Develop proposal for submission to project review process	X				

2.4 Supporting Documentation

1. Appendix B, "Administrative Records Project Case Study Examples."
2. Appendix C, "Accessing and Using the Administrative Records Tracking System."
3. Appendix D, "Guidance for the Negotiation of Data Acquisition Agreements."

2.5 Process Flowchart

Initial Project Development

Project Contact (PC)	Administrative Records Coordinator (ARC)

Start

PC Gets Idea for ADREC Project (1)

PC Checks ARTS to Determine Availability of Data (2)

A

PC Submits Project to Formal Review Process (3a)

Are Data Currently Available?

— Yes

End

No

PC Consults with DID for Demographic Data (3b)

PC Consults with EPCD for Fed. Economic Data (3c)

PC Consults with Geography for MAF Data (3d)

PC Consults with ARC for Other Data (3e)

Yes

Are Data Available for Use in ADREC Projects?

No

B

Initial Project Development (continued)

Project Contact (PC)	Administrative Records Coordinator (ARC)

B

Is Source/ Funding for Data USPS, IRS, SSA, CMS,, BLS, BEA?

No

Yes

PC Consults with ARC Before Approaching Source Agency (4b)

PC and ARC Determine Strategy for Approaching Source Agency (5)

PC Contacts Source/Funding Agency for Informal Discussions (4a)

A

| 2. Initial Project Development |
| 3. Project Review & Approval |
| 4. Agreement Negotiation & Data Acquisition |
| 5. Data Access & Agreement Administration |
| 6. Project Implementation |

Section

3

3. Project Review and Approval

The review and approval process ensures projects are authorized by Title 13, U.S.C., are in compliance with existing data agreements, and provides adequate controls to protect confidentiality and privacy. These controls include the Privacy Act of 1974, the Computer Matching and Privacy Protection Act of 1988, and Office of Management and Budget Circular A-130. The U.S. Census Bureau will make public notification concerning any Privacy Act system of records involving administrative data about people or households, including those that combine such data with information about businesses. A Privacy Act system of records refers to a system containing records of individuals in which personal identifiers are maintained and records are retrieved by those personal identifiers. The Privacy Office will maintain responsibility for these notifications. The law does not require public notification for a system of records involving administrative data exclusively about businesses or addresses.

Section 3.1 provides procedures for the review and approval of internal Census Bureau projects, and Section 3.2 provides procedures for the review and approval of external projects.

Unless specifically exempted (see Section 1.4), all projects involving administrative records data must be submitted for formal review and approval using the Administrative Records Tracking System (ARTS). This requirement does not apply to projects requiring only Master Address File (MAF) data. However, Project Contacts (PC) interested in using the MAF or in securing address data from other sources should consult with the Geography Division.

New projects cannot commence until they are reviewed and approved. After the initial approval, recurring projects using existing or updated data from administrative records are exempt from annual reviews. However, activities that require new administrative records or significant modifications to existing data uses are subject to review in accordance with the procedures detailed in this section.

This review process and the criteria referenced supersede those described in a prior document "Approval Process for Projects Using Administrative Records," dated April 26, 2000.
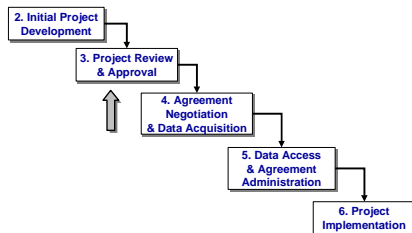
3.1 Internal Census Bureau Projects

This section describes the specific steps involved in the review and approval process for newly proposed projects that are internal to the Census Bureau, including projects classified as "joint" or "reimbursable." It includes discussions on roles and responsibilities, documentation, initiating project review, and obtaining project approval. Internal project review occurs after "Initial Project Development" (see Section 2) and before the formal negotiation and acquisition of administrative data (see Section 4).

At the end of Initial Project Development, the PC should have informally vetted the proposal and obtained all the necessary information about the administrative record file(s). The next steps are to document the proposal, obtain Division Chief approval, obtain Census Bureau ADREC Project Review Team approval, and ensure data supplier approval, if required.

Recurring projects, projects conducted on a cyclical basis with no substantive changes, require approval when they are first proposed. They do not require further approval unless the project undergoes a change in methodology, data use, or dataset. It is the PC's responsibility to identify such changes and resubmit the project for review as a "new" project. "Recurring" and "new" projects are further defined in the glossary and in Section 1.3.1.

External projects are reviewed using a similar, but separate process, described later in this section. "Internal," "external," "joint," and "reimbursable" are defined in the glossary and in Section 1.3.1.

3.1.1 Process Steps

The following steps are numbered to correspond with the flow chart that follows.

1. **The PC creates a proposed project record in the Administrative Records Tracking System (ARTS)**. [MBH1](See Appendix C, "Accessing and Using the Administrative Records Tracking System (ARTS)," for more information.) The project record includes fields for information on project objectives, methodology, datasets, and scheduling. If the project is recurring, the PC must make sure it is specified as such. Otherwise, the project may need to be reviewed again. The project record is the only document that the Census Bureau and other agency reviewers will use to assess a proposal. Therefore,

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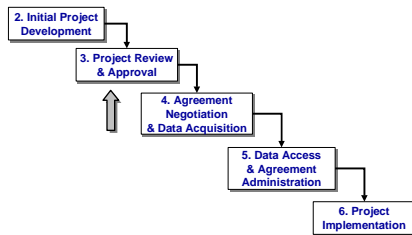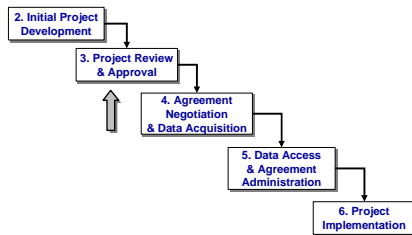
the information in the project description must be complete and stand alone as a formal project proposal.

All project reviews will rely upon the criteria in Appendix E, "Project Review Criteria." So, the PC must ensure that the project description clearly addresses those criteria, especially the anticipated benefit to the Census Bureau, if applicable.[2] The ARTS contains help screens and pull down menus designed to aid the PC in effectively documenting the proposal.

Certain Members of the Committee on Administrative Records Policies and Procedures (CARPP) are available to provide general guidance on proposal preparation and other administrative records processes. They are listed in Appendix F, "Administrative Records Role Summary and Key Contacts."

2. **The PC notifies the Division Chief when the proposal is ready for division review.** Using the appropriate division procedures, the PC alerts the Division Chief that the proposal is in the ARTS and ready for review. Divisions may require additional subject matter review. However, these additions are not part of the formal administrative records project review requirements.

3. **The Division Chief conducts the review.** The Division Chief accesses the completed project record in the ARTS and evaluates the proposal using the administrative records project review criteria. All of the criteria may be taken into account during the review. However, the Division Chief is primarily responsible for ensuring that the proposal has scientific merit, possesses a Census Bureau (Title 13, Chapter 5) benefit, if applicable, and presents no undue disclosure risk or conflict of interest. The Division Chief also must determine if all affected divisions are willing and able to participate.

4. **The Division Chief denotes approval or disapproval electronically in the ARTS.** Projects that are disapproved do not continue through the review process. To avoid formal disapproval, PCs may wish to work within the division informally prior to seeking the formal Division Chief review.

5. **The ARTS automatically notifies the Project Review Coordinator** by electronic mail after receiving the Division Chief's approval. When timing is an issue, the PC should contact the Project Review Coordinator, located in the

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[2] Projects that are conducted under the authority of Title 15, U.S.C., do not require a Title 13, Chapter 5, benefit. Certain administrative records data (e.g., Federal Tax Returns and Return Information) cannot be used to conduct non-Title 13 projects.

2. Initial Project
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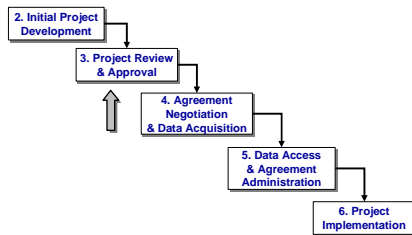
Center for Economic Studies (CES),[MBH2] as soon as possible. The Coordinator will try to work out an acceptable review schedule.

6. **The Project Review Coordinator conducts an initial screening** of the proposal for completeness and clarity. This is not a screening for content to assure approval. If a proposal is incomplete or unclear, the Project Review Coordinator will work with the PC prior to initiating further review.

7. **The Project Review Coordinator initiates the review** by providing to the Review Team a timetable and information needed to locate the proposal in ARTS. The team generally consists of:

- The Project Review Coordinator, CES;

- The Administrative Records Coordinator (ARC), OAES;

- Information Technology Security Office representative(s);

- The Assistant Division Chief for Data Management, Data Integration Division (DID) – if the project involves "person" or demographic data; and

- The Economic Planning and Coordination Division Representative (EPCD) – if the project involves "business" or federal economic data.

The Review Team members first review the proposal independently, applying the criteria provided in Appendix E, "Project Review Criteria." They may take all of the criteria into account during their review. However, they are chiefly responsible for evaluating consistency with existing data agreements or feasibility of obtaining new data, corporate benefit, effect on relationships with partner agencies, public perception issues, and new data linkage concerns.

Individual members within the Review Team have particular responsibilities. It is the responsibility of the ARC to ensure that the policy-related criteria are applied. For projects using "person" or demographic data, the Assistant Division Chief (ADC) for Data Management/DID has responsibility for reviewing the proposed use of ADREC data in the context of any agreement with the data supplier. For projects using "business" or federal economic data, the EPCD team member must review the project in the same manner. A consolidated checklist is prepared, documenting that all applicable criteria were considered. The PC is responsible for including all status and disposition information into the CES Information Management System (IMS).

Team members will indicate their approval in ARTS. If, however, there are questions or issues about the project, the team will meet to discuss the proposal.[3] In either case, the Project Review Coordinator must ensure that the criteria checklist is completed and documented in ARTS.

8. **The Project Review Team completes its review and chooses one of four outcomes:**

    A. Revise and resubmit[MBH3].

    B. The Project Review Team may refer the project to the Data Stewardship Executive Policy Committee (Stewardship Committee) for a decision. If the team believes that there are significant policy implications that cannot be addressed within the parameters of existing Census Bureau policy, it will forward the proposal to the Stewardship Committee and notify the PC.

    C. Approved,[4] approval may be contingent on approval by the supplying agency/agencies.

    D. Disapproved.

9. **The Project Review Team's decision results in the following actions**:

    A. The PC revises the project at the request of the ARC and begins the process again at Step 2, notifying the Division Chief that the proposal is ready for review.

    B. The ARC prepares background documentation on the pending issue in order to facilitate the Stewardship Committee's consideration at its next regularly scheduled meeting. As with all issues being prepared for Stewardship Committee consideration, the ARC works with the CARPP in preparing the issues paper. The ARC contacts the Project Review Coordinator who enters DSEP approval or disapproval in the ARTS and conveys it electronically to the PC.

    C. Proceed to Step 10.

---

[3] EPCD attends only in non-routine situations, based on its review and checklist completion.
[4] Approval may be contingent on approval by the supplying agency/agencies.

```
2. Initial Project
  Development

        3. Project Review
          & Approval

              4. Agreement
               Negotiation
            & Data Acquisition

                  5. Data Access
                   & Agreement
                  Administration

                        6. Project
                     Implementation
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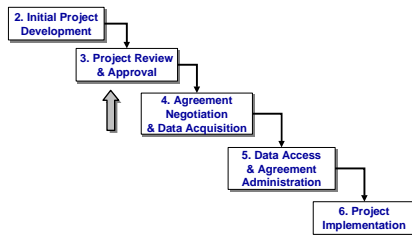
D. <u>The PC or Division Chief receives, upon request, an explanation of the chief reason(s) for disapproval</u>. At that time, if the Division Chief has additional information that may have bearing on the decision, they may work with the ARC to see if the concerns can be addressed, and the Review Team's decision reversed.

If not, then the Division Chief can appeal the disapproval of a project to the DSEP. The Division Chief must ask the Committee Chair to place the proposal on the agenda for discussion and prepare an issues paper in consultation with the ARC. In these instances, DSEP can reverse the decision of the Review Team.

The Project Review Coordinator documents all status/disposition information in ARTS and communicates it to the PC. Within two weeks after Review Team approval, the Coordinator informs all non-voting DSEP members (such as programmatic division chiefs) about the record of the approved project in ARTS.

10. **DID or EPCD will contact data suppliers** as necessary to notify them of the new project and secure appropriate approvals. The office seeking data supplier approval will denote this approval in ARTS.

11. **The IRS will be handled directly by the ARC.** For projects using IRS data, the ARC will seek approval for the project by preparing a letter from the Census Bureau's Director to the Statistics of Income Division (SOI) at IRS with a copy to the Office of Disclosure at IRS. [MBH4]

12. **Final approval is recorded in the ARTS** by the Project Review Coordinator after all required approvals are gathered. At this time, the PC can begin the project or continue with formal data acquisition activities. (See Section 4, "Agreement Negotiation and Data Acquisition" for more details on the latter.) A project is considered finally approved once it has been approved by the Division Chief, the Census Bureau Review Team, DSEP, as needed, and the IRS or other data suppliers, as needed.

If the project requires a new dataset or amendments to an existing agreement in order to allow for the new use, the PC must work to obtain data with the ARC and either DID (for person data) or EPCD (for business data). If the data are available internally at the Census Bureau and the proposed use is allowed under an existing data agreement, the PC should contact DID or EPCD to

2. Initial Project Development

3. Project Review & Approval

4. Agreement Negotiation & Data Acquisition

5. Data Access & Agreement Administration

6. Project Implementation
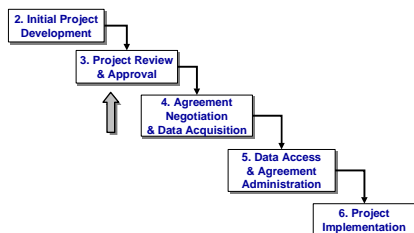
arrange for the data release. (See Section 4 "Agreement Negotiation and Data Acquisition" for more information on this process.)

If the proposal is disapproved at any stage of the review process, the PC may contact either the Project Review Coordinator or the ARC to discuss how the proposal might be revised to address the identified concerns.

3.1.2 Documentation Requirements

1. PC completes a project record in the ARTS.
2. Division Chief denotes division approval/disapproval on the project record in the ARTS.
3. Review Team members denote their approval/disapproval of the project in ARTS.
4. Project Review Coordinator denotes DSEP approval/disapproval on the project record in the ARTS, if applicable.
5. ARC prepares a letter to the IRS for the Director's signature using information from project record, if applicable.
6. ARC denotes IRS approval/disapproval on the project record in the ARTS, if applicable.
7. DID or EPCD denotes other supplier approval/disapproval on the project record in the ARTS, if required.
8. Project Review Coordinator indicates "final approval" in ARTS.

3.1.3 Roles and Responsibilities

The following table provides a summarized view of each participant's chief functions in the review process.

								IRS
Notification	X		X		X			
Documentation in ARTS	X	X	X	X	X	X		
Coordinate Review	X		X					
Conduct Review		X		X			X	X
Coordinate with DSEP					X			
Coordinate with IRS or Other Data Supplier					X	X		

3.1.4 Supporting Documentation

1. Glossary
2. Appendix C, Accessing and Using the Administrative Records Tracking System (ARTS)
3. Appendix E, Project Review Criteria, Draft, 9/13/00 (including MOU/Policy Checklists)
4. Appendix F, Administrative Records Role Summary and Key Contacts

3.1.5 Process Flowchart

Process Overview

2. Initial Project Development → 3. Project Review & Approval → 4. Agreement Negotiation & Data Acquisition → 5. Data Access & Agreement Administration → 6. Project Implementation

Internal Project Review & Approval

Division	CES	Administrative Records Coordinator

Division:

START

→ Project Contact (PC) Creates Proposed Project Record in ARTS (1)

→ PC Notifies Div. Chief Project is Ready for Review (2) ← E

→ Division Chief Conducts Review (3)

→ Division Chief Denotes Disapproval (4a) → END

→ Division Chief Denotes Approval in ARTS (4b)

→ ARTS Notifies Project Review Coord. Project is Ready for Bureau Review (5)

CES:

Project Review Coord. Conducts Initial Screening (6)

→ Project Review Coord. Initiates Review (7)

→ Reviewers Evaluate Project Independently (7a)

→ Reviewers Complete Review & Approve/Reject Project (8)

→ Team Approves?

- Yes → C
- Referred to DSEP → D
- Revise & Resubmit → A
- No → B

Internal Project Review & Approval (continued)

Division	CES		Administrative Records Coordinator

A

Project Contact Revises Project Description (9a)

E

Division Chief Prepares & Submits Issues Paper to Stewardship Committee (9e)

B

Project Review Coord. Notifies PC of Disapproval (9b)

Div. Chief Appeals?

YES → (to Division Chief Prepares & Submits Issues Paper)

No → **END**

C

Project Review Coord. Denotes Approval in ARTS & Informs PC (9c)

D

ARC Prepares Issue Paper for DSEP Review & Presents (9d)

DSEP Reviews Project (9g)

Project Review Coord. Denotes DSEP Review in ARTS (9h)

Proposal Approved?

No → **END**

Yes → Data Supplier Approval Required?

Yes → **F**

No → **G**

Internal Project Review & Approval (continued)

Division	CES	Administrative Records Coordinator/ DID/EPCD
	(G)	(F)
	Project Review Coord. Denotes Final Approval in ARTS (12)	DID/EPCD or ARC Coordinates Requesting Approval (10)
	END	DID/EPCD or ARC Obtains Approval & Denotes in ARTS (11)

Process steps (top left):
- 2. Initial Project Development
- 3. Project Review & Approval
- 4. Agreement Negotiation & Data Acquisition
- 5. Data Access & Agreement Administration
- 6. Project Implementation

3.2 External Census Bureau Projects

External proposals are those received from external researchers through CES. This section describes the specific steps for review of external proposals for ADREC projects, as well as the roles and responsibilities associated with project review. "Internal" and "external" projects are further defined in the glossary and Section 1.3.1.

An external ADREC project starts when an external party contacts the CES to express interest in conducting a research project at either the CES or at one of its Research Data Centers (RDCs). The formal process begins when the Principal Investigator (PI) submits a proposal to CES. The CES must then identify reviewers and schedules a review session. Finally, the CES Project Selection Committee reviews and determines whether to approve each project. At the end of external project review, the project implementation phase begins. (See Section 6.)

3.2.1 Process Steps

The following steps are numbered to correspond with the flow chart that follows.

1. **The PI submits a preliminary proposal** through the CES Internet site, following the specified format.

2. **The CES Information Management System (IMS) notifies the CES Project Review Coordinator or the RDC Administrator** that the preliminary proposal is in the IMS and ready for review.

3. **The Project Review Coordinator/RDC Administrator conducts an initial screening.** The PI may be invited to submit a full proposal or revise the preliminary proposal. The screening hinges on where the work will take place and whether demographic (person) or economic (business) administrative records will be used. This initial screening considers the potential benefit to the Census Bureau, [5] type of output, potential disclosure risk, conflicts of interest, data availability, and planned lab time.

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[5] Projects that are conducted under the authority of Title 15, U.S.C., do not require a Title 13, Chapter 5, benefit. Certain administrative records data (e.g., Federal Tax Returns and Return Information) cannot be used to conduct these types of projects.

4. **The Project Review Coordinator/RDC Administrator denotes acceptance, revision, or rejection of the preliminary proposal in the IMS.** The system notifies the PI of the decision. If the preliminary proposal is accepted, the PI is invited to submit a full proposal.

5. **The PI submits a full proposal**, including a Predominant Purpose Statement (PPS) [MBH5]using the CES Internet site. The Project Review Coordinator/RDC Administrator advises the PI of the proposal development on a continuing basis.

6. **The Project Review Coordinator schedules the project for the next proposal review cycle**.

7. **The Project Review Coordinator assigns the proposal to at least two reviewers** six weeks before the review meeting. If the proposal uses economic data, the reviewers are typically staff economists at CES with significant experience using the data required in the proposal. If the data required are demographic, the reviewers may be drawn from programmatic divisions within the Census Bureau as well as CES staff. For projects occurring at an RDC, the RDC Administrator assigns two local reviewers.

8. **The Reviewers independently assess the scientific merit and benefit of the project**, as noted in the Appendix E, Project Review Criteria.

9. **Reviewers submit their reviews** within four weeks of receiving the proposal. They use a standard template found in the CES IMS Internet site.

10. **The CES Project Review Coordinator convenes a Project Selection Committee** meeting one week after all reviews are in the system, approximately six weeks after the proposal submission deadline. The CES Project Selection Committee includes:

    - CES Director,

    - CES Assistant Division Chief,

    - CES Project Review Coordinator,

    - CES Policy Officer,

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2. Initial Project
Development
    3. Project Review
    & Approval
        4. Agreement
        Negotiation
        & Data Acquisition
            5. Data Access
            & Agreement
            Administration
                6. Project
                Implementation
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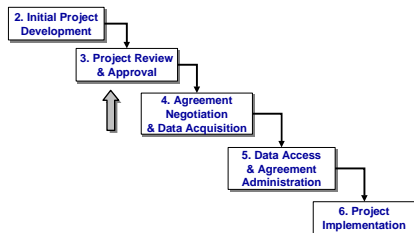
- Assistant Division Chief for Data Management, DID, or a designated representative,

- ARC, OAES,

- EPCD Representative,

- Information Technology Security Office representative(s);

- Representatives from agencies whose data are proposed for use in the project (at their option).

11. **The Project Review Coordinator presents proposal summaries and reviews, and concerns are fully discussed** at the project selection meetings. The three possible outcomes are approval, revise and resubmit, or disapproval. If there is support for the proposal, but a policy issue is raised that is outside the limitations of existing ADREC policy, it is referred to the Stewardship Committee. If there is support for the proposal, but there is a significant weakness in it, the review committee asks the PI to revise and resubmit the proposal for review during the next review cycle. If there are minor questions, the committee will ask the PI to submit a letter of clarification.

   The Project Selection Committee is responsible for applying all of the specified project review criteria. It is the particular responsibility of the ARC to ensure that the policy-related criteria are applied and documented. For projects using "person" or demographic data, the ADC for Data Management/DID is responsible for reviewing the proposed use of ADREC data in the context of any agreement with the data supplier. For projects using "business" or federal economic data, EPCD is responsible for reviewing the project in the same manner. The Project Review Coordinator ensures that all applicable criteria were considered by the appropriate area (the ARC, DID and/or EPCD) and documented in a consolidated review checklist. The Project Review Coordinator must include all status and disposition information in the CES IMS.
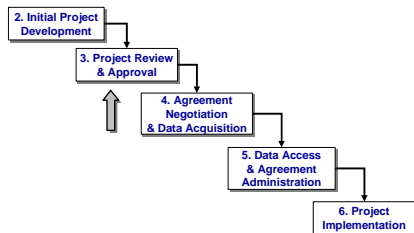
12. **The ARC prepares an analysis of the pending issue** in order to facilitate the Stewardship Committee's consideration at its next regularly scheduled meeting. As with all issues being prepared for Stewardship Committee consideration, the ARC works with the CARPP in preparing the issues paper.
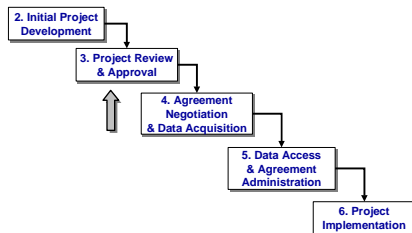
13. **The ARC conveys Stewardship Committee approval or disapproval to the Project Review Coordinator**, who records the outcome in the CES IMS Internet site. If Federal Tax Returns and Return Information (FTI) is not involved, the Coordinator informs all non-voting Stewardship Committee members (such as programmatic division chiefs) about the record of the approved project in ARTS within two weeks of approval.

14. **When Stewardship Committee approved projects FTI, the Project Review Coordinator works with the IRS Statistics of Income (SOI) Division.** The SOI receives the PI's PPS and the underlying proposal for each project.

15. **For an FTI project, the IRS informs the CES and ARC of its approval or disapproval** within three weeks of receiving the PPS and proposals. Within two weeks after the IRS approval, the Coordinator informs all non-voting Stewardship Committee members (such as programmatic division chiefs) about the record of the approved project in ARTS.

16. **DID or EPCD will contact non-IRS data suppliers** to notify them of the new project and secure appropriate approvals as necessary. The office seeking approval will document it in the project record in ARTS. The Project Review Coordinator will ensure that it is recorded in the CES IMS Internet site.

    A project has "final approval" once: the CES Project Selection Committee; the IRS, as necessary; the Stewardship Committee, as necessary; and any other data suppliers, as necessary have approved it. Once a project is finally approved, the Project Review Coordinator or RDC Administrator will notify the PI and make necessary arrangements to begin the project.

17. **The Project Review Coordinator will ensure that all approved projects are incorporated into ARTS** within two weeks of final approval of each annual review cycle. This information will then be used to generate official Census Bureau reports on Administrative Records projects. Projects requiring other data supplier approval are moved earlier in order to facilitate EPCD and DID tracking.

3.2.2 Documentation Requirements

1. PI completes an initial proposal via the CES Internet site.
2. Project Review Coordinator or RDC Administrators denotes initial approval/revision/disapproval via the CES IMS.
3. PI completes a final proposal via the CES Internet site.

2. Initial Project Development

3. Project Review & Approval

4. Agreement Negotiation & Data Acquisition

5. Data Access & Agreement Administration

6. Project Implementation

4. Reviewers complete review records in the CES IMS.
5. Project Review Coordinator ensures that the Review Checklist is complete.
6. Project Review Coordinator denotes Project Selection Committee approval/revision/disapproval in CES IMS.
7. The Project Review Coordinator denotes IRS approval/disapproval in the IMS, if applicable.
8. The Project Review Coordinator denotes DSEP approval/disapproval in the CES IMS.
9. EPCD and DID denote other data supplier approval/disapproval on the project record in ARTS, if applicable
10. The Project Review Coordinator denote other data supplier approval/disapproval on the project record in CES IMS, if applicable

3.2.3 Roles and Responsibilities

The following table provides a summarized view of each participant's chief functions in the review process.

							IRS
Notification	X	X			X		
Documentation in CES IMS	X	X	X		X		
Coordinate All Reviews		X					
Conduct Review			X	X	X	X	X
Participate in Committee Review		X		X	X		X
Coordinate with DSEP					X		
Provide File Copies to IRS		X					
Export Projects into ARTS		X					

3.2.4 Supporting Documentation

1. Glossary
2. Appendix E, Project Review criteria, Draft, 9/13/00 (including MOU/Policy Checklists)
3. Appendix F, Administrative Records Role Summary and Key Contacts

3.2.5 Process Flowchart

External Project Review & Approval

Principal Investigator	Project Review Coordinator	RDC Administrator

Start

PI Reads Proposal Guidelines

All Project Researchers Create System Account ID

PI Performs Initial Proposal Checklist

6 Items Checked Yes? — No / Yes

PI Creates Preliminary Proposal In Mgmt System

System Notifies PRC & RDCA

RDCA Reviews Preliminary Proposal Entry

PI Updates Preliminary Proposal in Mgmt System — Yes

Continue? — No

Approved? — No / Yes

PI Withdraws Proposal — No

Continue? — Yes

RDCA Notifies PI to Submit Draft Proposal

System Notifies PRC and RDCA

RDCA Performs Proposal Checklist

PI Uploads Draft Proposal Documents to Mgmt System

System Notifies RDCA

PI Revises Draft Proposal & Submits to Mgmt System — Yes

Continue? — No

Approved? — No / Yes

A

Side navigation diagram

2. Initial Project Development

3. Project Review & Approval

4. Agreement Negotiation & Data Acquisition

5. Data Access & Agreement Administration

6. Project Implementation

External Project Review and Approval (continued)

Reviewer	Project Review Coordinator	RDC Administrator

A

System Notifies PRC

PRC Requests Reviewers If Necessary

RDCA Sends Reviewer Names to PRC

PRC Assigns Reviewers to Proposal

Suppress Email to Reviewer?

No → System Sends Proposal Documents to Reviewers → Reviewer Uploads Review

Yes → PRC or RDCA Uploads Reviews

System Notifies PRC When Review is Submitted

10 Days Before Deadline: Review Submitted?

No → System Sends Reminder to Reviewer → Reviewer Uploads Review

Yes ↓

System Notifies PRC When Review is Submitted

Deadline Reached: All Reviews Submitted?

No → Extend Deadline?

Yes → PRC Enters New Date Into Mgt. System

No ↓

Yes ↓

PRC Follows up with Reviewer

PRC or RDCA Uploads Reviews

PRC Prepares Synopsis of Reviews and Issues for Review Committee

B

External Project Review and Approval (continued)

Reviewer	Project Review Coordinator	RDC Administrator

B

C

Committee Approves?

Yes → Referral to DSEP Needed?

No → PRC Denotes Outcome in Mgmt System

ARC Prepares Issues Paper & Presents to DSEP

Yes

DSEP Reviews Proposal

Mgmt System Notifies RDCA

RDC and CES Correspond as Appropriate

Approved?

Yes → PRC Updates Event Log

No

C

No → Data Supplier Approval Required?

No

PRC and RDCA Organize Notification to PI

Is IRS the Data Supplier?

Yes

Yes → D

No → E

Approved

Yes

No

PRC Denotes Final Approval in ARTS

System Archives Proposal

END

2. Initial Project Development

3. Project Review & Approval

4. Agreement Negotiation & Data Acquisition

5. Data Access & Agreement Administration

6. Project Implementation

External Project Review and Approval (continued)

Administrative Records Coordinator	Project Review Coordinator	RDC Administrator
E	D	F
DID Coordinates Requesting Approval	System Generates Draft PPS and Cover, and Notifies RDCA	RDCA Checks PPS
DID Communicates Approval to PRC		RDCA Sends PPS and PPS Coversheet to PRC
C	PRC Sends PPS & Proposal to IRS	
	Approved by IRS? — Yes → C	
	No	
	PRC Sends IRS Comments to RDCA	
	F	

2. Initial Project
Development

3. Project Review
& Approval

4. Agreement
Negotiation
& Data Acquisition

5. Data Access
& Agreement
Administration

6. Project
Implementation

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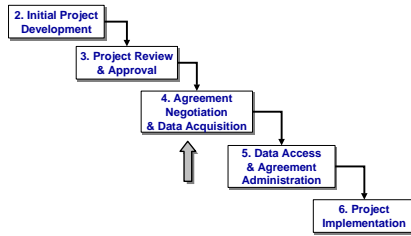
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4. Agreement Negotiation and Data Acquisition[MBH6]

This section describes the process by which administrative record data files supporting a particular project are acquired by the U.S. Census Bureau. In most cases, either a data agreement letter or a Memorandum of Understanding (MOU) is required. MOUs for the acquisition of administrative records (ADREC) files must have clearance from OAES, the Information Technology (IT) Security Office, and the Office of General Counsel. They also require a signature at the Associate Director level or higher.

The agreement negotiation and data acquisition process usually begins after the informal conception and development stage (see Section 2) when an ADREC project has been submitted for review (see Section 3). However, time constraints or other concerns may call for the initiation of this process before review begins.

Due to the range of data files available and the sensitivity of individual person data, the process for negotiating and acquiring demographic data can be slightly more complex than the process for obtaining other types of administrative records. The primary negotiator for demographic files is the Data Integration Division (DID). Federal economic data are acquired and maintained for the Business Register on a continuous basis by the Economic Planning and Coordination Division (EPCD). The Geography Division is responsible for acquiring address files to support the Master Address File (MAF). These include the U.S. Postal Service's Delivery Sequence File (DSF), files from state[MBH7], local, and tribal governments, and files from the private sector.

4.1 Process Steps

For Proposed Projects Requiring Use of "Person" or Demographic Administrative Record Data:

1. **When a project begins review, OAES Administrative Records Coordinator (ARC) facilitates a strategy meeting involving the Project Contact (PC) and**
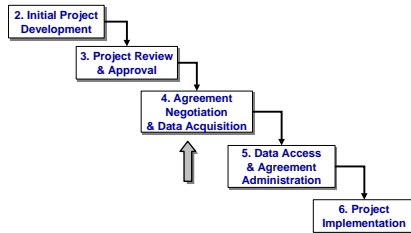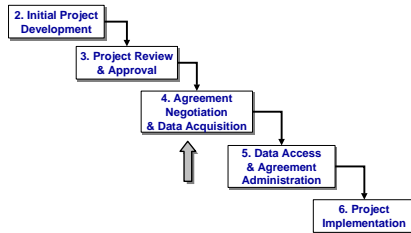
DID. In some cases, when there are time or other constraints, it may be necessary to initiate this strategy meeting prior to the project being submitted for review.

The purpose of this meeting is to develop a strategy for negotiating a MOU with the source agency, as well as any contractual arrangements necessary to acquire the required data. In collaboration with the PC and the ARC, DID assigns and tracks the tasks necessary to acquire the data. These tasks might include contacting the source agency, writing up contractual arrangements, drafting the MOU, and writing a data request letter. Meeting participants will also consider the potential costs necessary to obtain ADREC data and determine if these costs are justified.

The team also will determine if third-party concurrence is necessary, such as Internal Revenue Service (IRS) concurrence to acquire earnings data from the Social Security Administration. The team also establishes a timetable for accomplishing tasks to be tracked by DID. Assignments are made on a case-by-case basis depending on individuals' availability and expertise in negotiating the data acquisition. A complete checklist of items to be covered in this strategy meeting can be found in Appendix G.

2. **The strategy team (ARC, DID, and the PC) may reconvene, as necessary,** to assess progress on the negotiations or to revise the strategy. Once the MOU and other documents have been drafted, DID negotiates with the source agency to finalize them and obtain the appropriate signature(s). DID also serves as the custodian for demographic administrative record data. It is the Census Bureau's responsibility for receiving, logging and tracking the whereabouts and use of the demographic data in its care.

3. **DID receives the data files from the source agency where it logs in the data and conducts any necessary pre-processing**. Pre-processing might include a system of removing identifiers or anonymizing microdata containing individual names or Social Security numbers.

4. **DID releases the data to the PC** with a data release memorandum that articulates the appropriate uses of the data, legal authorities under which the data are being released, and confidentiality/disclosure requirements. Details on this process are described in Section 5, "Data Access and Agreement Administration."
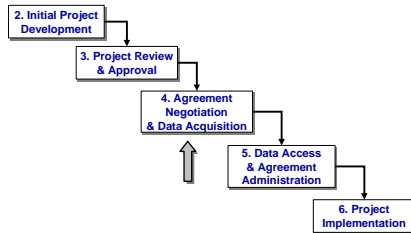
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2. Initial Project
Development

3. Project Review
& Approval

4. Agreement
Negotiation
& Data Acquisition

5. Data Access
& Agreement
Administration

6. Project
Implementation
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5. **The PC implements the approved project** with the required administrative data (see Section 6, "Project Implementation") and in accordance with the technical and security controls (see Appendix H).

For Proposed Projects Requiring Use of "Business" or Federal Economic Administrative Record Data:[MBH8]

The primary purpose for acquiring federal economic data is to support the Business Register. [MBH9]These acquisitions take place routinely, through an ongoing process with three key source agencies: the Internal Revenue Service (IRS), the Bureau of Labor Statistics (BLS), and the Social Security Administration (SSA). The acquisition of these data is not, therefore, driven by the needs of a specific project.

If the PC is interested in obtaining additional administrative record data that are outside the scope of those normally acquired for the Business Register, the following procedure applies:

1. **The PC contacts EPCD staff to discuss the possibility of obtaining additional administrative record data.** Although ADREC data typically offer an efficient and cost-effective means of obtaining statistical data, the cost to obtain them are not always justified. The EPCD staff will advise the PC on the approximate cost and utility of the data.

2. **EPCD meets with the source agency** to assess the benefits and potential drawbacks of the PC's data request.

3. **EPCD, in consultation with the agency, determines whether the new data will require a regulation change**. After the source agency agrees that the new data are a practical resource, EPCD will proceed with a formal regulation change request. (It typically takes IRS two years to implement a regulation change, and the IRS prefers that the Census Bureau accumulate multiple regulation change requests into a single submission.)

4. **EPCD adds the new data items to the Economic Directorate's official data request**, which is usually transmitted to IRS 18 months before the beginning of the fiscal year.

5. **Once a project requiring data from the Business Register is approved**, the PC may access the Business Register for purposes explicitly related to the project.

2. Initial Project
Development

3. Project Review
& Approval

4. Agreement
Negotiation
& Data Acquisition

5. Data Access
& Agreement
Administration

6. Project
Implementation

For Proposed Projects Requiring Use of the <u>Master Address File (MAF)</u>:

Like the Business Register, the process of developing the MAF is also routine and ongoing. The development and maintenance of the MAF is the responsibility of the Geography Division. The Geography Division acquires address data from the U.S. Postal Service (the DSF), local and tribal governments, and private vendors. As the custodian of these data, the Geography division is responsible for ensuring that the Census Bureau adheres to any source-agency restrictions placed on these files.

Projects requiring other administrative record data *in addition* to MAF data will be subject to the procedures in this handbook. However, projects requiring only MAF data are currently beyond the scope of these administrative record processes. However, PCs interested in using the MAF or in securing address data from other sources should consult with the Geography Division. Please see Section 2, "Initial Project Development," for further details.

For Proposed Projects Requiring the Use of <u>Other Types</u> of Administrative Record Data Not Mentioned Above:

There may be instances where a project requires ADREC data that are outside the scope of the demographic and federal economic categories noted above (for example, state-level business files). There also may be instances when PCs do not have immediate access to the Business Register and require use of data in that frame. In this event, the PC should contact the ARC. The ARC will then work with the PC, DID, and EPCD to determine how best to negotiate for and acquire the necessary data.

4.2 Documentation Requirements

For Projects Requiring Use of <u>"Person" or Demographic</u> Administrative Record Data:

1. During the strategy meeting, DID documents the individuals assigned to draft the MOU, the data request letter, contracts, and any other documents necessary to acquire the administrative data files. DID also tracks a timetable developed by the strategy team for completing these tasks.

2. DID finalizes the MOU and other documents in cooperation with the source agency. The negotiations necessary to develop the MOU, and its formal
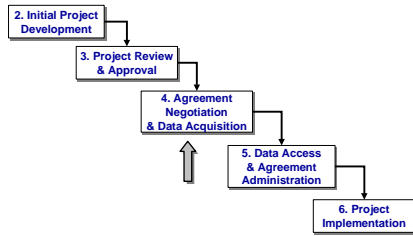
clearance process within the Census Bureau will be tracked in the Administrative Records Tracking System (ARTS).

3. DID documents acquisition of the data file upon its arrival from the source agency.

For Projects Requiring Use of the "Business" or Federal Economic Administrative Record Data:

1. EPCD prepares the MOU, data request letter, contracts, and any other documents necessary to acquire administrative record data to support the Business Register.

2. EPCD finalizes the MOU and other documents in cooperation with the source agency.

3. EPCD documents the acquisition of the data file upon its arrival from the source agency.

**For Proposed Projects Requiring Use of the MAF:**

1. The Geography Division prepares the MOU, data request letter, contracts, and any other documents necessary to acquire administrative record data to support the MAF.

2. Geography finalizes the MOU and other documents in cooperation with the source agency.

3. Geography documents the acquisition of the data file upon its arrival from the source agency.

4.3 Roles and Responsibilities

The following table provides a summarized view of each participant's chief function in the acquisition of administrative record data files.

For Demographic Data:

|			ARC
Initiate meeting to prepare MOU and negotiation strategy for new data			X
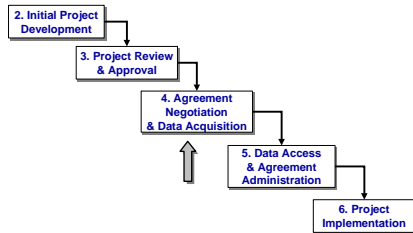
			ARC
acquisition			
In strategy meeting, determine roles and responsibilities for document preparation (MOU, data request, contracts, etc.)	X	X	X
Draft documents necessary to acquire data	X	X	
Coordinate with source agency and Census Bureau for MOU/data request and signature		X	
Acquire data as Census Bureau custodian		X	
Complete any necessary pre-processing of data		X	
Prepare data release memorandum for demographic data		X	
Release data to PC		X	

For Business Register Data:

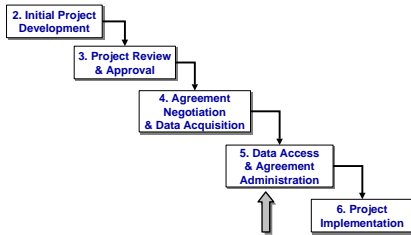|			ARC
Draft documents necessary to acquire data to support the Business Register		X	
Coordinate with source agency for final language of MOU/data request and signature		X	
Acquire data as Census Bureau custodian		X	
Complete any necessary pre-processing of data		X	

For Master Address File Data:

			ARC
Draft documents necessary to acquire data to support the Master Address File		X	
Coordinate with source agency for final language of MOU/data request and signature		X	
Acquire data as Census Bureau custodian		X	
Complete any necessary pre-processing of data		X	
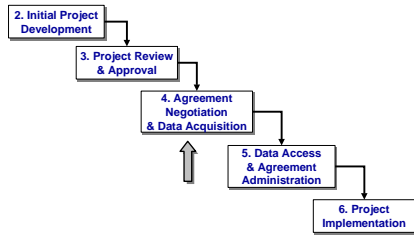
4.4 Supporting Documentation

1. Appendix D, "Guidance for the Negotiation of Data Acquisition Agreements."

2. Appendix G, "Negotiation Checklist."

3. Appendix H, "Technical Controls."

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3. Project Review
& Approval

4. Agreement
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& Data Acquisition

5. Data Access
& Agreement
Administration

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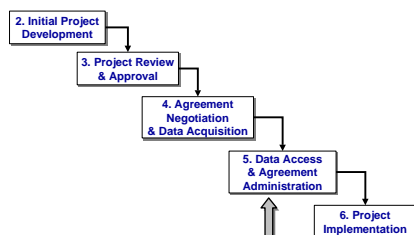# 5. Data Access and Agreement Administration

This section outlines the specific steps, documentation requirements, and responsibilities associated with the implementation of administrative records (ADREC) agreements between the U.S. Census Bureau and other agencies. An internal Census Bureau commitment to an ADREC agreement is normally established during the negotiation phase. The formal administration of data agreements begins immediately after the negotiation phase and signing of the agreement. (See Section 4.) Administration of an agreement occurs throughout the life of the agreement and project implementation. It ends when the Memorandum of Understanding (MOU) expires.

5.1 Process Steps

1. **The Census Bureau and the source agency determine all responsibilities and deliverables** required and explicitly specified under the agreement during the negotiation and sign-off phase of the process. (See Section 4.)

   Responsibilities and deliverables may include such things as custodianship of the data, period of agreement, security requirements, reporting requirements, quality assurance, data or service delivery, and the disposition of data at the conclusion of the retention period.

2. **The Census Bureau's custodian of the administrative data is responsible for ensuring that the data remain secure and accessible to authorized users only**. The custodian is responsible for meeting the reporting requirements of the agreement.

   ▪ For "person" or demographic administrative records, the Assistant Division Chief for Data Management, Data Integration Division (DID) is normally the designated custodian. (See Appendix H, "Technical Controls" for the requirements associated with physical and information technology security.)

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- For "business" or federal economic administrative records, the Chief of the Data Stewardship and Management Staff, Economic Planning and Coordination Division (EPCD) is normally the designated custodian.

3. **The Administrative Records Tracking System (ARTS) is the system by which DID and EPCD ensure that all requirements are met over the life of the agreement.** This process is facilitated by the ARTS Implementation Activity Records that are filled out by the DID ARTS Coordinator, usually at the time of MOU signature. The Implementation Activity records contains the following variables:

   - The Activity Name

   - Agreement Name

   - Person Responsible

   - Due Date of Activity

   - Predecessor Requirement

   - Status of Activity

   - Approval

   - Additional Comments

4. **The source agency delivers the data to Census Bureau facilities**, where it may reside for a period of time specified in the agreement. The tracking of access to the data is handled differently for demographic and economic files.
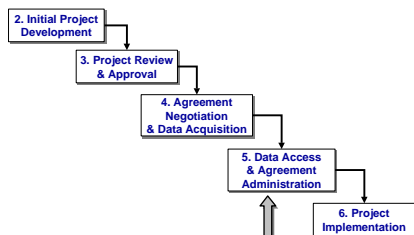
For "Person" or Demographic Files:

a) When the Project Contact (PC) accesses the ARTS to complete a project description record, ARTS allows the PC to generate a data request record and electronically submits it to DID.

b) DID reviews the data request to (1) determine if the data are in-house; (2) confirm that the use complies with the license or agreement; (3) determine if further research is required; and (4) determine if processing by DID is required. The DID also works with the program area to ensure that all data items on the request record are complete and interpreted correctly.

c) After the project is approved, DID generates a release document in the ARTS to be signed by the PC and Assistant Division Chief. All individuals accessing the file must receive a copy of the release letter detailing the authorities for acquiring the data and the penalties for disclosure and misuse. Once appropriate staff members sign the release letter, DID transfers the data to the PC. [MBH10]

For "Business" or Federal Economic Files:

a) The PC is responsible for completing a project description in the ARTS for any project using Federal Tax Returns and Return Information (FTI). This includes any project using the primary economic datasets, including the Business Register, the Nonemployer Register, or the Quarterly Financial Report extract.

b) PCs outside the Economic Directorate who require access to the FTI must complete a project description in the ARTS as well as Internal Data Request record that identifies the needed FTI. The EPCD reviews the request record to (1) confirm that the use complies with the interagency agreement; (2) confirm the project is approved; and (3) confirm that requested data resides on a primary or subsidiary economic dataset. Upon approval, EPCD notifies the office with direct control of the dataset to provide access.

c) All users of FTI will receive an annual data release document in conjunction with Title 26 awareness training. The data release document details the authorities for acquiring data, the penalties for disclosure or misuse, and the IRS data elements contained in the primary economic datasets. [MBH11]
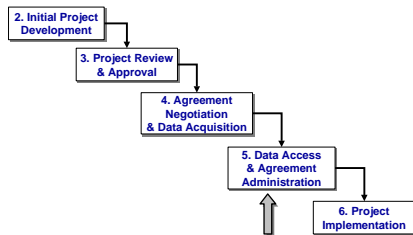
5. **New projects involving existing ADREC data must verify that all data uses are permissible under the terms of the MOU.** This is accomplished during the Project Review phase when an MOU Checklist is prepared by DID or EPCD. The MOU checklist also notes whether the source agency requires written notification of the project or if an amendment must be developed or approved before the project can be approved.

6. **When the file retention date expires, the Census Bureau is required to either destroy or return the data** as specified in the agreement with the source agency. In the case of demographic data, DID's ARTS staff will notify the PC in the writing of destruction requirements. In the case of federal economic data, the EPCD will notify the Bowie Computer Center to blank and degauss data. File dispositions are kept on record by DID or EPCD and reported to the source agency on an annual basis.

7. **DID or EPCD, in consultation with the PC, assesses the need to extend the agreement** as its expiration approaches. Typically, the agreement is renewed, but in some cases a new MOU may be warranted.

5.2 Documentation Requirements

1. The DID or EPCD ARTS staff completes documentation of agreed-upon MOU responsibilities (ARTS Implementation Activity Records).

2. The PC completes a project description in the ARTS during the project review process; the use of data is checked against the agreement for compliance with allowable uses.

3. For demographic files, DID generates a release document in the ARTS for signature by the PC (data requestor) and the Division Chief/Assistant Division Chief of the division requesting the file.

4. For demographic files, the PC notifies DID in writing if anyone else is to use or see the data or if any data are released.

5. Economic data files are not released to PCs. Instead, FTI is incorporated in primary economic datasets. EPCD prepares an annual economic data release document for all FTI users.
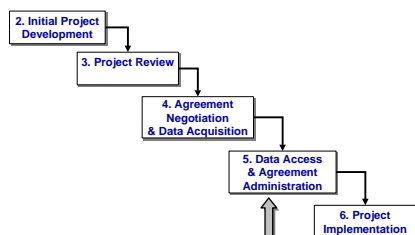
6. The DID/EPCD custodians annually report all data file activity to the source agency as required by agreements. If the source agency is supplying both demographic and economic data, this reporting is normally coordinated with the Administrative Records Coordinator.

7. DID/EPCD prepare MOU checklists to determine if new projects are permitted under existing agreements and whether written notification to the source agency is required. (See Section 3, Project Review and Approval, for additional details).

5.3 Roles and Responsibilities

The following table provides a summarized view of each participant's chief function in the data release process for "person" or demographic files:
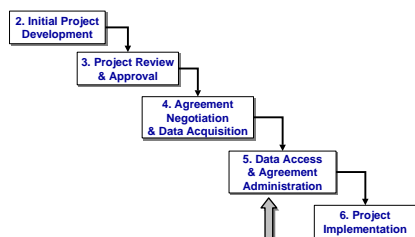
		DID
Complete Internal Data Request	X	
Review Request		X
Quality Assurance Check		X
Prepare Release Document for Signatures		X
Annual Report of Data File	X	X
Notification of Expiration of Data File		X

The following table provides a summarized view of each participant's chief function in the data release process for "business" or federal economic files:
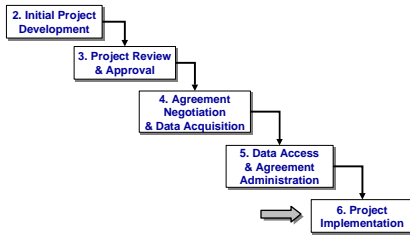
	Economic Directorate Project Contact	Non-Economic Directorate Project Contact	EPCD
Complete Internal Data Request	N/A	X	
Review Request			X
Quality Assurance Check			X
Prepare Release Letter for Signatures			X
Annual Report of Data File			X

5.4 Supporting Documentation

1. Appendix C, Accessing and Using the Administrative Records Tracking System (ARTS)

2. Appendix H, "Technical Controls"

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6. Project Implementation

This section discusses the details of project implementation requirements for administrative record projects. They include maintaining accurate project records, meeting source agency reporting requirements, completing annual awareness training, ensuring proper background investigations, providing physical and information technology security for administrative records (see Appendix H, "Technical Controls"), and implementing project closeout procedures.

Project implementation begins after the signing of the agreement (see Section 4) and the data has been acquired (see Section 5).

6.1 Requirements for Maintaining Project Records

This section describes the requirements for keeping project documentation up-to-date, including maintaining an accurate accounting of individuals assigned to administrative records (ADREC) projects. This activity is essential to support U.S. Census Bureau administrative records reporting requirements, which will be facilitated by information from the Administrative Records Tracking System (ARTS).

The following is a list of reports required by various agencies. The Census Bureau area dealing with this material is shown in parenthesis:
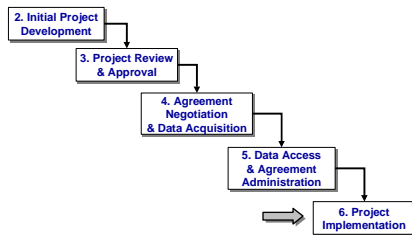
Internal Revenue Service (IRS):

The Safeguard Procedures Report (OAES)

Annual Safeguard Activity Report (OAES)

Annual Needs & Use Report (Economic Planning and Coordination Division (EPCD), and the Data Integration Division (DID)

Annual Data Request Letter (EPCD and DID)

Annual Detail Level Project Information (EPCD and DID)

Social Security Administration (SSA): (DID – All)

Maintenance of Inventory of Files (1967 Agreement and 1994 Addendum thereto)

Annual Status Report

Annual Report for Research Projects covered under SIPP/LEHD Agreement

**Centers for Medicare and Medicaid Services (CMS):** (DID)

Maintenance of Inventory of Files

These reports are further described in the "Supporting Documentation" section below.

The Census Bureau's Privacy [MBH12]Office must provide public notification concerning any Privacy Act system of records involving administrative data about people or households. A Privacy Act system of records refers to a system containing records of individuals in which personal identifiers are maintained and records are retrieved by those personal identifiers. Although the law does not require public notification for a system of records involving data exclusively about businesses or addresses, notification is required when these data are combined with information about people or households. This notification is in accordance with the Privacy Act of 1974, the Computer Matching and Privacy Protection Act of 1988, and Office of Management and Budget Circular A-130. [MBH13]

6.1.1 Process Steps

1. **Project Contacts (PC) should update information about personnel supporting projects** on a real-time basis by editing their project records in ARTS. The updates should include both adding and deleting individuals with special sworn status (SSS) for all projects and employees for all projects other than Economic Directorate projects that use the Business Register. Refer to Section 6.2, "Awareness Training and Certification," for further requirements if an individual is added to a project that uses FTI.

2. **PCs should update information about projects** (status and start/end dates) several times throughout the year to support preparation of the reports listed above. OAES, DID, and EPCD will make specific requests to the PCs for these updates.
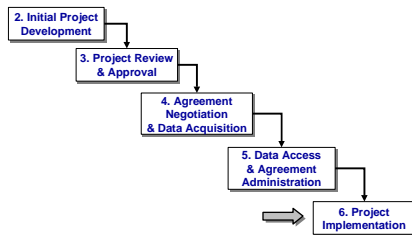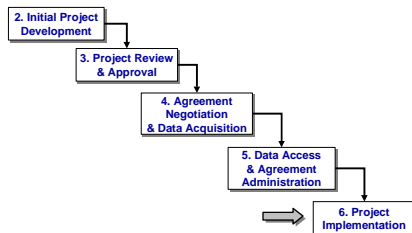
3. **PCs should update status information and perform several other steps as part of "closeout" procedures** for projects that are completed or are terminating prior to completion. The steps are as follows:

   a. The PC should change project status to "completed" or "terminated before completion" in ARTS.

   b. For "person" and demographic data, the PC should notify DID of the disposition of the files upon completion of the project and annually thereafter for as long as the files are kept.

   c. The PC notifies the Office of Security Counter-Espionage Branch that the SSS activities are finished for the specific project. Based on the date provided by the PC, the SSS individual's information is removed from the appropriate project record in the ARTS. The Office of Security Counter-Espionage Branch checks the ARTS database to determine if this individual is still actively working on any other approved projects. If they are, no further action is required at this time. If not, this individual is placed in an inactive status in the CBS/CBS database.

   The following list contains the only fields that the PC will be permitted to edit.

   ▪ Status

   ▪ Start Date

   ▪ End Date

   ▪ Special Sworn Status Entries

   ▪ Employees Supporting Project

   NOTE: Any changes needed to other fields that are "read only," e.g., "Project Methodology" or "Dataset Used" will likely constitute a new project, which requires re-approval. See definition of new project in the Glossary. To enable the necessary changes, the PC should make a copy of

> *the project description in ARTS, edit the copy, and submit it for project review and approval. See Appendix C for more details regarding ARTS.*

4. **The office responsible for a specific report, OAES, DID or EPCD, will begin preparation of specific reports** following the completion of project updates by PCs. This may include a review of updated project information as well as those projects for which no information has been updated. The office preparing the report may ask individual PCs for additional information regarding their records to support the production of specific reports.

5. **Specific reports may be documented in ARTS for archival purposes.**

6. **The PC must have any report that contains administrative record information reviewed** according to Census Bureau and source agency disclosure requirements. The PC has the responsibility to carry this out.

6.1.2 Documentation Requirements

The preceding section describes the steps necessary to support the production of required reports. As more components are developed in ARTS to support the Bureau's reporting requirements, documentation requirements will be added to this section.

6.1.3 Roles and Responsibilities

Based on the information described above, the following roles and responsibilities have been identified:

			Office of Security Counter-Espionage Branch
Update Project Description Fields:			
▪ Status as "Closeout" or upon request	X		
▪ Start Date upon request	X		
▪ End Date at "Closeout" or upon request	X		
▪ Special Sworn Status entries real-time	X		
▪ Employees Supporting Project real-time	X		
Notify Project Contacts for required project updates		X	
Generate reports, obtain requisite clearances,		X	
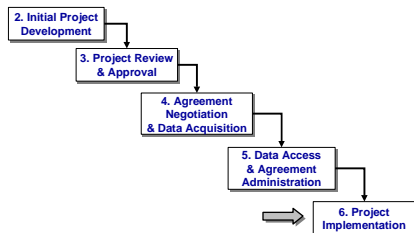
|			Office of Security Counter-Espionage Branch
and transmit reports (as required)			
Confirm whether reported SSS continues to work on other projects			X
Update SSS Status in CBS/CBS			X

6.1.4 Supporting Documentation

The following provides additional information regarding the Census Bureau's reporting requirements associated with the use of ADREC data.

1. **IRS Safeguard Procedures Report (SPR)** – As required under Internal Revenue Code (IRC) 6103(p)(4)(E), agencies receiving Federal Tax Returns and Return Information (FTI) are required to file a report that describes the procedures established and used by the agency for ensuring the confidentiality of the information received from the IRS. The SPR is a record of how FTI is processed by the agency and states how it is protected from unauthorized disclosure by that agency. Agencies should submit a new SPR every six years or whenever significant changes occur in their safeguard program.

   The Census Bureau delivered an SPR in preparation for the most recent IRS Safeguard Review, which was conducted on-site at the Census Bureau commencing in July 1999 and ending with a final report in December 2000.

2. **IRS Annual Safeguard Activity Report (SAR)** – As required under IRC 6103(p)(4)(E), this report is filed annually, by January 30, for the prior calendar year. This report advises the IRS of minor changes to the procedures or safeguards described in the SPR. It also advises the IRS of future actions that will affect the agency's safeguard procedures, summarizes the agency's current efforts to ensure the confidentiality of the FTI, and finally, certifies that the agency is protecting FTI pursuant to IRS 6103(p)(4) and the agency's own security requirements. As a result of the 1999 Safeguard Review, IRS has requested that the Census Bureau include descriptions of projects as part of this report. This report is transmitted from the Census Bureau Director to the IRS Office of Governmental Liaison and Disclosure.
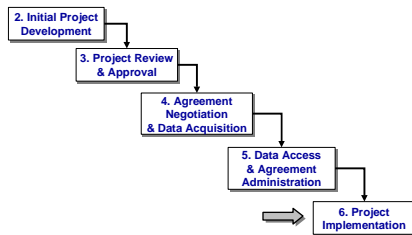
The Census Bureau complied with this request in the first SAR submission subsequent to the safeguard review, generating descriptions for all projects from the ARTS for the year 2000 reporting period.

3. **Annual Needs and Uses Report to the IRS** – This report is required by Specific Service and Conditions set forth in Interagency Agreements' contract language. For as long as it retains return information, the Census Bureau agrees to provide an annual report on the files provided under current and earlier similar contracts. Such reports will include information on the number and location of all files provided, as well as files derived therefrom. The Census Bureau further agrees to provide, at that time, a statement of its need for continued retention and the specific uses under the terms as referenced in the contract requiring this retention. The Census Bureau fulfills this reporting requirement with two separate reports – one each from the demographic and economic areas.

For the demographic area, it is sent from the Census Bureau Associate Director for Demographic Programs, and, for the economic area, it is sent from the Census Bureau Assistant Director for Economic Programs. Both reports are transmitted to the Chief Compliance Officer of the IRS, with a separate copy sent to the Director, Statistics of Income Division, IRS.

4. Both of the following documents are sent to the Director, Statistics of Income Division, IRS.

   a. **Annual Data Request Letter to the IRS** – As required under Title 26, United States Code (U.S.C.), Section 6103(j)(1), the Census Bureau will provide <u>program-level information</u> in the letter requesting FTI, and will transmit the detailed project-level information in a separate letter simultaneously. (See 4b below.) The data request letter and project-level information package are initiated and transmitted by the demographic and economic areas, respectively. For both areas, the letters of request are sent from the Secretary of Commerce to the Commissioner of the IRS.

   b. **Annual Detailed Project–Level Information for the IRS** – The Census Bureau will provide detailed <u>project-level information</u> in a separate letter and will transmit this information simultaneous to the transmission of the data request letter. (See 4a above.) The project-level information component of a request is transmitted from the respective demographic or economic initiating area. For the demographic area, it is sent from the Census Bureau
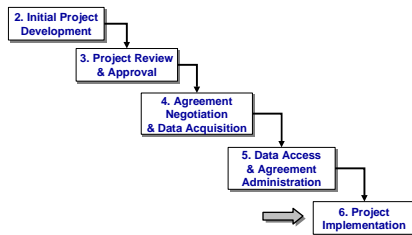
Associate Director for Demographic Programs, and, for the economic area, it is sent from the Census Bureau Associate Director for Economic Programs.
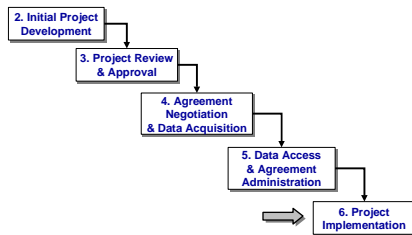
5. **Social Security Administration (SSA) Documentation** – For purposes of conducting self-audits and providing annual status reports, the Census Bureau is required to maintain an accounting of all data sets containing SSA data.[6] This includes both data with and without identifiers. Historically, the inventory has not been transmitted to the SSA. The Census Bureau keeps the inventory in-house and, as specified under the authorizing agreement, provides a status of the inventory in its annual report. The Census Bureau agrees to make the information available for inspection by SSA representatives at its headquarters facilities.

6. **Centers for Medicare and Medicaid Services (CMS) Requirements** – Under its existing Agreement with the CMS, the Census Bureau is required to maintain an inventory of files containing CMS data and make it available for inspection at CMA's request.

6.2 Awareness Training and Certification

The Census Bureau requires its employees and individuals with Special Sworn Status (SSS) to complete Title 13 Census Bureau awareness training annually. This training ensures that these individuals are aware of their responsibility to keep Title 13 data, as well as other sensitive data, confidential. It also advises them on the penalties for disclosing such information without authorization.

Each year, the Census Bureau must certify that employees and SSS individuals, who have access to FTI or IRS "Official Use Only" data, have been advised of their responsibilities associated with Title 26 (Internal Revenue Code) data protection and the penalties for unauthorized disclosure and use. For certification, these individuals must receive: (1) annual Title 26 awareness training; (2) a copy of the project description for which access to IRS data is required; and (3) a copy of the data release document that provides the appropriate uses of a particular IRS data set.

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[6] This action is required by the 1994 Addendum to the 1967 Agreement between the Census Bureau and the SSA.

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│ 2. Initial Project│
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    ┌──────────────────┐
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    └──────────────────┘
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        ┌──────────────────┐
        │ 4. Agreement      │
        │   Negotiation     │
        │ & Data Acquisition│
        └──────────────────┘
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            ┌──────────────────┐
            │ 5. Data Access    │
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            │  Administration   │
            └──────────────────┘
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        ⟹   ┌──────────────────┐
            │ 6. Project        │
            │  Implementation   │
            └──────────────────┘
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6.2.1 Process Steps

This section describes the specific steps, roles, and responsibilities associated with Title 26 awareness training and certification of employees and individuals with SSS.[7]

The three processes are described below:

1. The process for annual Title 26 awareness training and certification to IRS.
2. The process for ensuring training requirements are met prior to granting employees, or individuals with SSS, new access to FTI or "Official Use Only" data.
3. The process for Title 26 awareness training, when brief, short-term access to FTI is required (primarily refers to National Processing Center (NPC)).

The following steps are numbered to correspond with the flow chart that follows.

Annual Title 26 Awareness Training and Certification to IRS

1. **OAES generates a list of all employees and individuals with SSS who have authorized access to FTI or IRS "Official Use Only" data**. This "List of authorized FTI users" is created by September 27 of each year, and contains all people in the following categories:
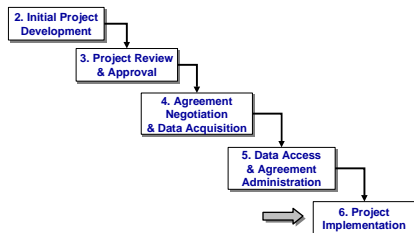
All employees in the Economic Directorate (including those working at NPC), except for those in the Governments and Foreign Trade Divisions.[8]

All employees and individuals with SSS attached to an approved FTI project in the Administrative Records Tracking System (ARTS).

2. **OAES notifies everyone on the list of authorized FTI users that they must complete the annual Title 26 awareness training by November 15** of that year, or their access to FTI will be revoked. Notification is given every year by October 1 or the first working day thereafter.[MBH14]

3. **Employees and people with SSS complete training**.

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[7] This section assumes that individuals meet the requirements for Title 13 training, because that requirement is broader than the scope of this handbook.

[8] Those working on FTI projects in the Governments or Foreign Trade Division are required to be listed in ARTS.

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a) Census Bureau employees, with access to the Census Bureau Intranet, log into cww.census.gov/itso/Security_Awareness_Training.htm [currently under development] and click on "Safeguarding IRS Title 26 Data" to complete the computer-based training (CBT). The CBT will generate a log of each entry into the training.

b) SSS individuals, who do not have access to the Census Bureau Intranet, obtain the CBT from their Census Bureau contact. They notify their contact when the training has been completed. The Census Bureau contact e-mails the Department of Commerce, Office of Security, at linda.h.guier@census.gov requesting that the SSS individual's record be updated to reflect the date training was completed.

4. **The completion of training is documented.**

a) For Census Bureau employees, the Workforce Development Branch of the Human Resources Division will update employees' training histories, as indicated on the CBT log, by entering the course into Learning Management System (LMS).

b) For SSS individuals, the Department of Commerce, Office of Security, will update the individual's CBS record to indicate the date that the Title 26 awareness training was completed.

5. **OAES sends out a reminder by November 8** (or first working day thereafter) of each year. Authorized FTI users are informed that if they have not completed their Title 26 awareness training by November 15 of that year, their access will be revoked.

6. **OAES matches the CBT log and CBS data to the list of authorized FTI users by November 16** (or first working day thereafter) of each year.

a) If everyone is in compliance, OAES will include the requisite information in its certification to IRS. It will state that all employees and SSS individuals who have access to FTI and IRS "Official Use Only" data have received their annual training and have been provided information regarding appropriate uses of the particular data sets in which they have access.

b) If individuals are non-compliant, OAES will notify the appropriate division chiefs, supervisors, and individuals that they have not completed their
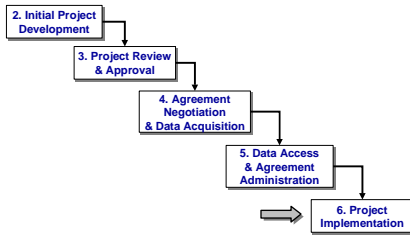
Annual Title 26 awareness training as required. If training is not completed by December 31, their access to FTI will be revoked.

7. **OAES will match the CBT log and CBS data to the list of authorized FTI users who have not completed training by December 31** (or first working day thereafter) of each year.

   a) If everyone is in compliance, OAES will include the requisite information in its certification to IRS. It will state that all employees and SSS individuals who have access to FTI and IRS "Official Use Only" data have received their annual training and have been provided information regarding appropriate uses of the particular data sets in which they have access.

   b) If individuals are non-compliant, OAES will notify the appropriate supervisor that they must revoke access to FTI immediately.[MBH15]

8. **Supervisors revoke access to FTI and notify OAES certifying that the individual(s) no longer have access to FTI.** Access may be restored only after training is completed.

9. **OAES will remove individuals identified in Step 7** [MBH16]**from its list of approved FTI users**. The requisite certification information will be included in the Annual Safeguard Activity Report to the IRS. It will state that all employees and SSS individuals who have access to FTI and IRS "Official Use Only" data have received training and have been provided information regarding appropriate uses of particular data sets to which they have access.
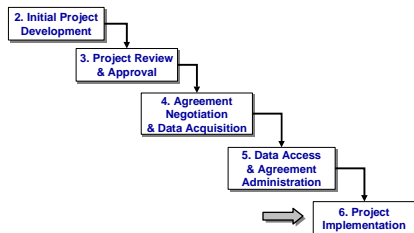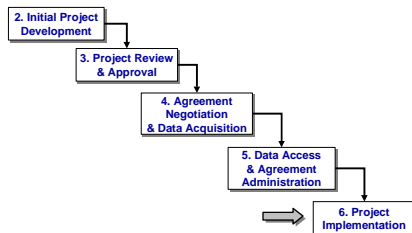
Training Process for New FTI Access

1. **Before granting individuals access to FTI or IRS "Official Use Only" data, the PC needs to determine the level of training required.** Throughout the year, employees or individuals with SSS will need access to FTI for which they did not have prior access.

For a Census Bureau employee being supervised by the PC:

2. **The PC determines if the employee has received Title 26 awareness training since December 31** of the prior year by entering Learning Management System (LMS).

3. **The PC notifies the employee to complete the Annual Title 26 awareness training** if the employee has not received the Annual Title 26 Awareness Training during the previous calendar year. If the training is current, then proceed to Step 7.

4. **The employee completes Title 26 awareness training** by logging into http://cww.census.gov/itso/Security_Awareness_Training.htm [currently under development] and clicking on "Safeguarding IRS Title 26 Data." The CBT will generate a log of each entry into the training. The employee notifies the PC that training has been completed.

5. **The Workforce Development Branch of the Human Resources Division (HRD) will update employees training history upon completion of the course** (as indicated on the CBT log).

6. **The PC re-enters Learning Management System (LMS) to verify training has been completed**.

7. **Access is provided**.

   a) For Demographic Programs, the Foreign Trade Division, and the Governments Division, the PC enters the employee into the Project Support section of the Project Record in ARTS and provides the employee with a copy of the project description and data release document that are available in ARTS. These documents describe the appropriate uses of the particular data sets to which the employee will have access. Finally, the PC provides the employee access to FTI.
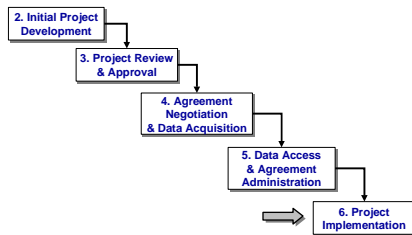
b) <u>For all other economic projects</u>, the PC provides the employee with the Economic Directorate's "data release document" that describes the description of approved Economic projects utilizing FTI, as well as describes the appropriate uses of the data sets to which the employee will have access. Finally, the PC provides the employee with access to FTI.

8. **The employee reads the project description and data release document**.

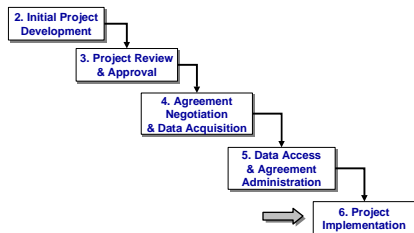**For Census Bureau employees not being supervised by the PC.**

9. **The PC notifies the employee's supervisor to determine if the employee's Title 26 awareness training is up-to-date**.

10. **The supervisor enters the Learning Management System (LMS) System** to determine if the employee has received Title 26 awareness training during the previous calendar year.

11. **The supervisor notifies the PC about the employee's status.** If the employee's status is current, the supervisor notifies the PC, and the process continues with Step 14. Untrained employees are directed to complete the Annual Title 26 awareness training.

12. **An employee without training completes the Title 26 awareness training** by logging into http://cww.census.gov/itso/Security_Awareness_Training.htm [currently under development] and clicking on "Safeguarding IRS Title 26 Data." The CBT will generate a log of each entry into the training. The employee notifies the PC that training has been completed.

13. **The Workforce Development Branch of the Human Resources Division will update employees training history**, as indicated on the CBT log by entering the course into Learning Management System (LMS).

14. **The Supervisor re-enters Learning Management System (LMS) to verify training** has been completed and notifies the PC that training has been completed.

15. **Access is provided**.

a) <u>For Demographic Programs, Foreign Trade Division, and Governments Division</u>, the PC enters the employee into the Project Support section of the Project Record in ARTS and provides the employee with a copy of the

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project description and data release document that are available in ARTS. These documents describe the appropriate uses of the particular data sets to which the employee will have access. Finally, the PC provides the employee access to FTI.

b) <u>For all other Economic projects</u>, the PC provides the employee with the Economic Directorate's "data release document" that describes the description of approved Economic projects utilizing FTI, as well as describes the appropriate uses of the data sets to which the employee will have access. Finally, the PC provides the employee with access to FTI.

16. **The employee reads the project description and data release document**.

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For Individuals with Special Sworn Status:

17. **The PC requests the Title 26 training history for the individual** from the Department of Commerce, Office of Security. If the training has been completed during the previous calendar year, then the PC proceeds to Step 21.

18. **The PC updates the CBT and instructs the SSS individual to complete the Title 26 awareness training**, if training has not been completed during the previous calendar year.

19. **The SSS individual notifies the Census Bureau contact after the training has been completed**. The Census Bureau contact e-mails the Department of Commerce, Office of Security, at linda.h.guier@census.gov requesting that the SSS individual's record be updated to reflect the date training was completed.

20. **Department of Commerce, Office of Security, updates the SSS individuals training history**.

21. **The PC enters the SSS individual into the Project Support section** of the Project Record in ARTS and provides the SSS individual with a copy of the project description and data release document. These documents are available in ARTS and describe the appropriate uses of the particular data sets to which the employee will have access. Finally, the PC provides the SSS individual access to FTI.

22. **The SSS individual reads the project description and data release document**.

Training Process for Census Bureau Employees for Which Short-Term Access to FTI is Required

There may be circumstances, especially related to staff at the NPC, under which a supervisor needs to assign a Census Bureau employee to very short-term access to FTI. For example, an employee assisting the Economic Directorate for a day or two may mail out survey forms that include a Census File Number, the business name, and the mailing address on the mailing label. At a minimum, the following process is required. Note: this training is never adequate for SSS individuals.

1. **The supervisor assigning temporary work notifies the employee the task involves accessing FTI**. The employee has a critical responsibility to protect the
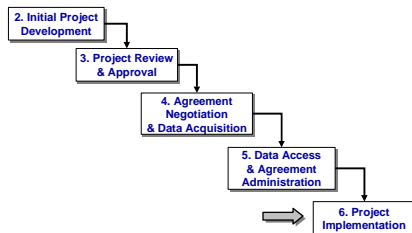
privacy and confidentiality of the income tax filers and provides for physical and procedural security to ensure the confidentiality of the data. The employee must use FTI for authorized purposes only. Failure to do so can cause the Census Bureau to lose access to the data or face a civil suit by the income tax filer. Dismissal, fines, and imprisonment are all possibilities. It is also important to inform the individual that <u>all</u> tax data, including names and addresses, are <u>equally</u> sensitive and are subject to IRS safeguard requirements and penalties regarding appropriate authorized uses. Each individual with access is legally bound by federal laws — whether the individual is a current employee, furloughed, or no longer employed (quit, retired, resigned, or terminated).

2. **The supervisor provides the employee with the "Abbreviated Title 26 Training Brochure"** prior to access to the FTI. The brochure is available on http://cww.census.gov/itso/Security_Awareness_Training.htm [currently under development] by clicking "Abbreviated Title 26 Training Brochure."[MBH17]

6.2.2 Documentation Requirements

1. OAES documents the list of authorized FTI users.
2. OAES generates a notification and reminder to each authorized FTI user that annual training is required.
3. OAES generates certification statements to the IRS in the SAR.
4. PC/Supervisors generate requests to the Department of Commerce Office of Security to determine training history for SSS individuals.
5. PC/Supervisors update ARTS with names of authorized FTI users.
6. PC/Supervisors generate notifications to OAES when access is revoked.

6.2.3 Roles and Responsibilities

				HRD/ Security
Generate List of FTI Users		X		
Certify Compliance to IRS		X		
Complete Training			X	
Verify Training	X			X
Update Training Records				X
Revoke Access	X			
Enter Users in ARTS	X			
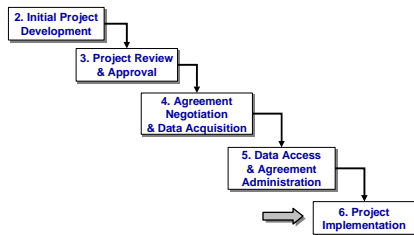
6.2.4 Supporting Documentation

Appendix I, *Safeguarding and Protecting Federal Tax Returns and Return Information—Guidelines for Census Bureau Officers and Employees and Persons with Special Sworn Status*

6.2.5 Process Flow Charts

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Yearly Title 26 Training and Certification Process

OAES	Division	Personnel/Security

OAES:

START 9/29

OAES Generates List of FTI Users

10/1 & 11/8 OAES Notifies FTI Users to Train

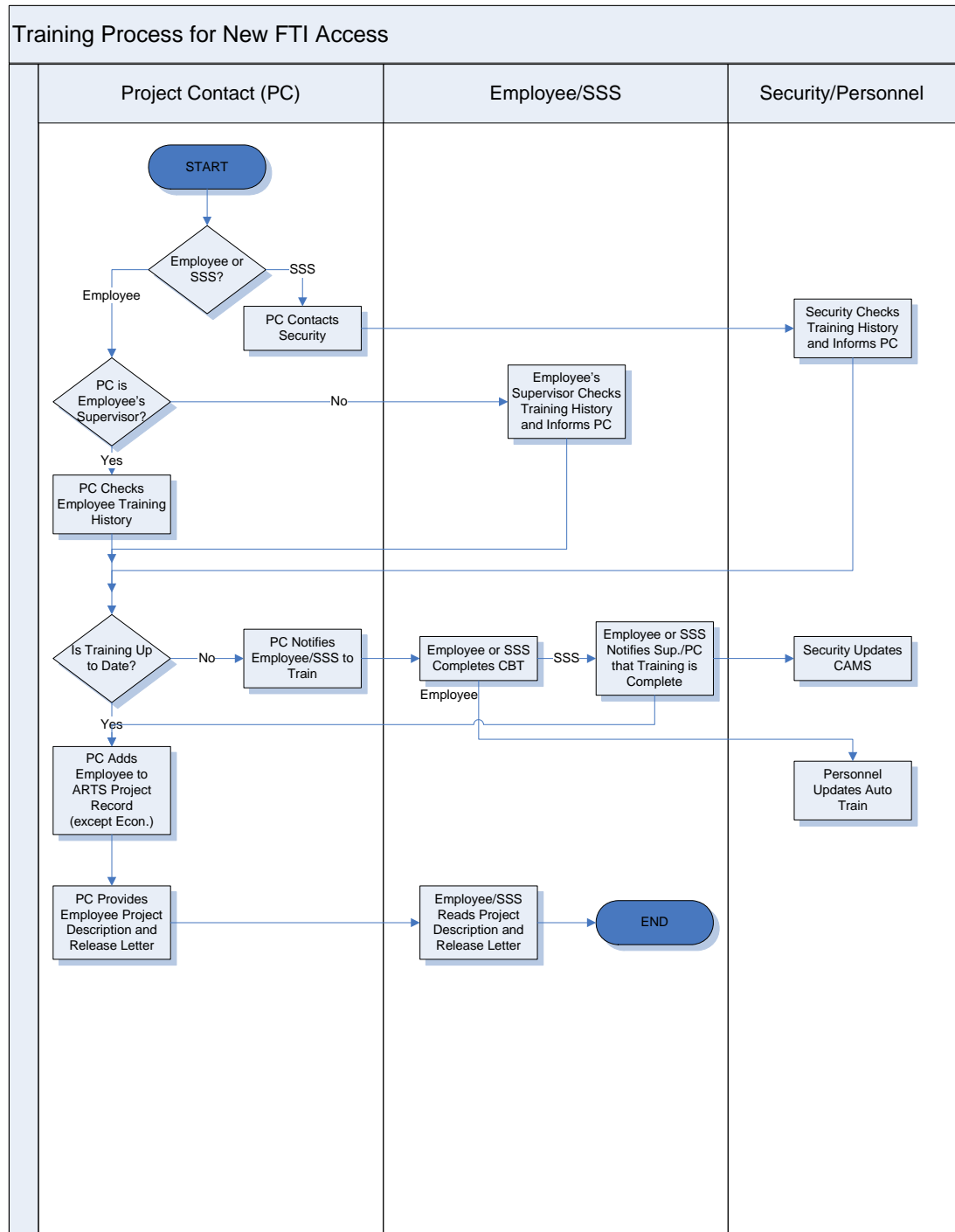11/16 OAES Compares Trainees to FTI Users

Do Lists Match? — Yes

No

OAES Notifies DC, Sup., & Users to Train

12/31 OAES Compares Trainees to FTI Users

Do Lists Match? — Yes

No

OAES Notifies Supervisor to Revoke Access

OAES Generates Certification to IRS

END

Division:

Users Complete CBT

Employee or SSS? — Employee

SSS

Supervisor Revokes Access

Personnel/Security:

HRD Updates LMS

Security Updates CAMS

Training Process for New FTI Access

Project Contact (PC)	Employee/SSS	Security/Personnel

START

Employee or SSS?

SSS → PC Contacts Security → Security Checks Training History and Informs PC

Employee

PC is Employee's Supervisor?

No → Employee's Supervisor Checks Training History and Informs PC

Yes

PC Checks Employee Training History

Is Training Up to Date?

No → PC Notifies Employee/SSS to Train → Employee or SSS Completes CBT

SSS → Employee or SSS Notifies Sup./PC that Training is Complete → Security Updates CAMS

Employee

Personnel Updates Auto Train

Yes

PC Adds Employee to ARTS Project Record (except Econ.)

PC Provides Employee Project Description and Release Letter → Employee/SSS Reads Project Description and Release Letter → END

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6.3 Security Background Check Requirements Prior to Accessing ADREC Files

This section describes the specific steps, roles, and responsibilities needed to ensure that individuals receive proper security background checks prior to accessing administrative records files. In general, personnel security procedures performed as part of bringing Census Bureau employees into the agency are sufficient to allow employees access to ADREC data. Therefore, this section focuses on the requirements associated with security background checks for the other major category of individuals who may need to access ADREC data, individuals requiring SSS. The additional requirements for documentation, training, and certification for SSS individuals are described in Sections 6.2 and 6.3.

In addition to its permanent employees, the Census Bureau may use temporary staff, as authorized by Title 13, United States Code (U.S.C.) Section 23(c):

"The Secretary [of Commerce] may utilize temporary staff, including employees of Federal, State, or local agencies or instrumentalities, and employees of private organizations to assist the [Census] Bureau in performing the work authorized by this title, but only if such temporary staff is sworn to observe the limitations imposed by section 9 of this title (i.e., 'maintain confidentiality of information')."

The current Census Bureau policy for the use of temporary staff – referred to as Census Special Sworn Status (SSS) individuals –requires that <u>all</u> potential SSS individuals must pass a pre-appointment suitability/security screening process prior to entrance on duty or the initiation of work with the Census Bureau.

Beyond the limitations imposed in Title 13, U.S.C., data suppliers may impose additional restrictions for access to their data. Therefore, the Census Bureau has developed specific procedures to ensure that it effectively tracks individuals accessing and using administrative records.

6.3.1 Process Steps

1. **At least two (2) weeks prior to expected access to data, Project Contact (PC) submits requisite pre-employment background check forms/documentation**
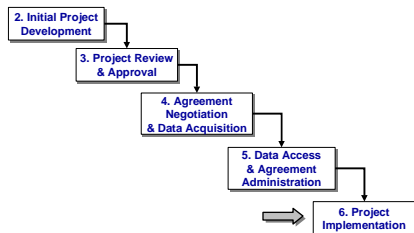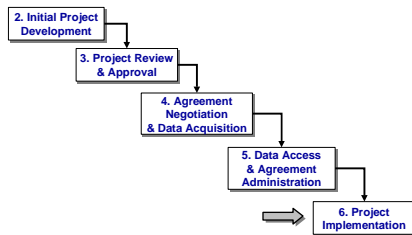
to Office of Security Counter-Espionage Branch. (See "Supporting Documentation.")

> **NOTE**: Potential SSS individuals requiring access for less than 14 calendar days will not require a background check. However, they will be required to take the oath of non-disclosure for Title 13. These individuals will be issued a daily visitor pass and must be escorted by a Census Bureau employee while at any Census Bureau site containing data or to an approved project requiring access to FTI.

2. **The Office of Security Counter-Espionage Branch reviews submitted forms package** for completeness and creates a folder and a database file in the Commerce Business System (CBS)/Commerce Business System (CBS) database.

> **NOTE:** Potential SSS individuals/contract employees who have previously had their suitability determined may not need to submit forms if (1) verification by a prior Government agency is pending, or (2) one calendar year or more has elapsed since they last started work under a Census Bureau contract/project or General Services Administration contract. Prior to Census Bureau employment, these potential SSS individuals shall, however, submit a statement in lieu of the required paperwork on the respective agency's letterhead indicating that they have a current suitability determination. In addition, the statement shall also list an agency point-of-contact, including an up-to-date telephone number, contract number(s), and performance dates for contracts/agreements in which they have participated, or are currently participating, that required such determination.

3. **The Office of Security Counter-Espionage staff forwards the specified pre-employment forms for processing** to the Census Decennial Applicant Name Check (DANC) Staff located in the Financial and Administrative Systems Division (FASD).

4. **The DANC staff electronically forwards paperwork to the Office of Personnel Management (OPM)/Federal Bureau of Investigation (FBI)**.

5. **The DANC staff receives results from the OPM/FBI**, and if:

   a. <u>No Criminal Record</u> - sends paperwork package with results directly to the Office of Security Counter-Espionage Branch.

   b. <u>Criminal Record</u> - completes further investigation in order to make a determination and forwards package with results to the Office of Security Counter-Espionage Branch.
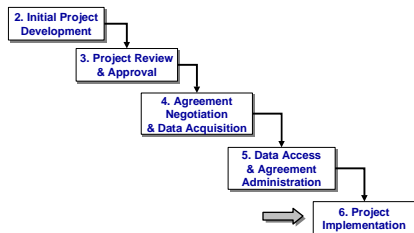
Should the PC receive an unsuitable report on any potential SSS individual or should an existing SSS individual become unsuitable for assigned duties, the PC shall be advised by the government that the employee cannot be assigned to work or continue to work under the contract/agreement. Any such employee shall be removed, and the PC will begin the process of finding a suitable substitute.

6. **The Office of Security Counter-Espionage Branch processes the information** by:

   a. Logging information (from Item 5.) into the CBS/CBS database.

   b. Making the final suitability determination.

   c. Entering final suitability determination information into the CBS/CBS database.

7. **The Office of Security Counter-Espionage Branch notifies the Project Contact** of the final determination by e-mail.

8. **All SSS individuals must complete Census Bureau Title 13 Training and Awareness modules** (UNDER DEVELOPMENT). If SSS individual's approved project activity requires access to Federal Tax Returns and Return Information (FTI), the PC ensures that FTI access certification requirements are met (as specified in Section 6.2 of this handbook) prior to permitting such access.

9. **At the conclusion of the SSS individual's approved administrative records project activity, the PC notifies the Office of Security Counter-Espionage Branch**, which verifies ARTS status for any other approved project activity for that individual. If the ARTS indicates that the SSS individual has no other approved administrative records project activities, the Office of Security Counter-Espionage Branch places the SSS individual in INACTIVE status.

6.3.2 Documentation Requirements

For all potential SSS individuals – At least two weeks prior to having access to any site that contains Census Bureau data or to an approved project requiring access FTI,

the PC must submit the following forms to the Office of Security Counter-Espionage Branch:

SF-86C - Special Agreement Check (SAC) - 15 to 365 calendar days on contract

SF-85   - National Agency Check Inquiry (NACI) - more than 365 calendar days on contract

FD-258 - Fingerprint Cards

OF-306 - Declaration for Federal Employment

BC-1759 - Special Sworn Status

These forms may be obtained from the headquarters staff of the Office of Security Counter-Espionage Branch.

6.3.3 Roles and Responsibilities

Potential SSS Individual –
Completion of all requisite Census Bureau security background check forms/documents.

Submission of completed documentation to PC.

Project Contact –
Determines what forms/documents are required for security background check for the potential SSS individual and ensures delivery to same.

Submits completed security background check documentation package to the Office of Security Counter-Espionage Branch.

Notifies Office of Security Counter-Espionage Branch when SSS individual's work on specific project is completed.

Office of Security Counter-Espionage Branch –
Receives potential SSS individual security background check information package from PC and establishes a file for that individual in the CBS/CBS database.

Submits information package to the DANC Staff.
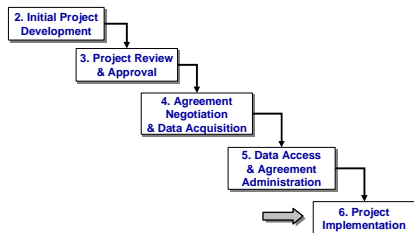
Receives investigation results from the DANC Staff and makes final status determination about the potential SSS individual.

Documents final status determination in CBS/CBS database.

Notifies PC about final status determination.

Upon notification by the PC that the SSS individual's work is finished for a specifically approved administrative records project, verifies in ARTS the status of the individuals approved project activity requirements (i.e., is this individual approved on any other projects)? If no other approved project activities, places the SSS individual in INACTIVE status in CBS/CBS.
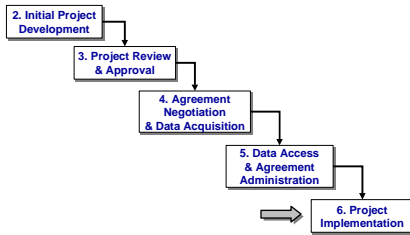
DANC Staff –
Receives potential SSS individual's security background check information package from the Office of Security Counter-Espionage Branch.

Submits all forms for processing.

Receives results requisite security checks.

Forwards information package with security check results to the Office of Security Counter-Espionage Branch.

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6.3.4 Supporting Documentation

Bureau of the Census Broadcast Message

Date: November 22, 2000

MEMORANDUM FOR All Offices and Division Chiefs

Through: Michael S. McKay
                Special Advisor to the Deputy Director

From: Sandra J. Patterson, Chief
                Decennial Applicant Name Check Staff
AND
                Michael L. Mersch, Chief,
                Census Office of Security

Subject: Census Bureau Policy for Clearing Contractors/Special Sworn Status

This memorandum is to advise all divisions and offices on new procedures for clearing any contractor/Special Sworn Status on Census premises or working on a Census project. Prior to entrance on duty or initiation of work, the contractor/Special Sworn must pass a pre-appointment investigative process. All project managers, Contractor Officer Technical Representative (COTR), administrative officers or division personnel who are responsible for having a contractor or Special Sworn personnel working within a Census facility or in Census designated areas must adhere to the new policy. This policy is effective the date of this memorandum.

The policy will require all contractors/Special Sworns to complete a pre-appointment suitability/security screening process prior to the inception of work with the Census Bureau. A minimum of two weeks notice must be given to the Office of Security Counter-Espionage Branch, Office of Security to initiate the pre-appointment investigative process. The initial pre-appointment check will be based on a fingerprint check with the FBI. Favorable results will be obtained within 3-5 working days. Fingerprint checks resulting in the identification of a criminal record will require additional investigation and can take up to 14 days to resolve.

Favorable results from the pre-appointment check must be obtained before the contractor/Special Sworn is allowed to begin work. The Office of Security Counter-Espionage Branch will notify the project managers, COTR, administrative officer or appropriate personnel of pre-appointment results.

1. All contractors/Special Sworns must be administered the Title 13 Oath of Nondisclosure by the Office of Security Counter-Espionage Branch using the BC-1759, Special Sworn affidavit.

2. Contractors requiring access for less than 14 days will not require a pre-appointment check. These individuals will be issued a daily visitor pass and MUST be escorted by a Census employee while on Census facilitates or Census designated areas.

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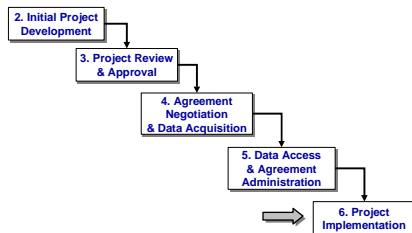
3. Contractors who require access longer than 14 days, but less than one year will be required to complete the SF-86C, BC-1759 and be fingerprinted for a Special Agreement Check (SAC).

4. Assignments for a year or longer will require a National Agency Check Inquiry (NACI). The completion of the SF-85, OF-306, BC-1759 and fingerprints will be required for processing.

Any questions regarding contractor/Special Sworn processing should be directed to the Chief of the Census Office of Security Counter-Espionage Branch.

TEMPORARY MEMORANDUM -- General – 19: Reissue of PPM Temporary Memoranda General-19: "New Building Pass and Investigative Procedures for Contractors and Individuals with Special Sworn Status," May 21, 2001. http://cww.census.gov/po/g19.htm [MBH18]

Section

7

7. Policy and Guidance

This section describes how administrative record policy issues should be developed and decided, and how changes to this handbook will be made.

7.1 Administrative Records (ADREC) Steering and Guidance Activities

This section describes the roles and responsibilities associated with providing steering and guidance on ADREC policy and procedural matters. Steering and guidance activities support administrative record use at the U.S. Census Bureau by (1) developing clear policies that ensure that the administrative records are used in keeping with the Census Bureau's legal and ethical obligations and (2) providing systematic change control to improve operational procedures. As such, they can occur throughout all of the relatively more discrete processes outlined in Sections 2 through 6 of this handbook.

On behalf of the full Executive Staff, the <u>Data Stewardship Executive Policy Committee (DSEP),</u> provides corporate guidance and sets Census Bureau administrative records policy. DSEP is supported by an operational-level administrative records issues and policy development group called the <u>Committee on Administrative Records, Policies and Procedures (CARPP).</u> Three other staff groups focus on the following related topics:

The Privacy, Policy, and Research Committee (privacy and confidentiality).

The Enterprise Security Issues and Policy Group (security).

The Disclosure Review Board (disclosure avoidance).

In addition, several other ADREC project review criteria-related groups exist, whose interaction with the primary decision-making body is described below. In general, staff interested in bringing specific administrative record issues to DSEP's attention may do so by contacting members of CARPP. A charter for each group is included in Appendix J.

7.1.1 Documentation Requirements

Documentation requirements are elaborated in each group's charter. In summary:

1. Each group chair should provide a written agenda and materials to members in advance of meetings, and timely minutes after.
2. Staff groups must prepare written materials for presentation to DSEP in time for distribution.
3. DSEP should document its decisions in a memorandum series.
4. OAES will post minutes and decision documents on its Intranet site.
5. Individual staff may be called upon to document issues or concerns in order to facilitate the work of the staff groups.

7.1.2 Roles and Responsibilities

The Data Stewardship Executive Policy Committee is a decision-making body that sets policy by deliberating on issues that have been fully analyzed and vetted by one or more of the groups mentioned above. Project Contacts or other staff with questions, ideas, or concerns about current administrative records policy should direct their comments to individual members of the CARPP.

The CARPP is the primary group that monitors and evaluates administrative records procedures and activities. They are responsible for keeping this handbook up-to-date and for considering any changes to related procedures. Members represent each directorate with a role in administrative records. Therefore, Project Contacts (PCs) or other staff with questions, ideas, or concerns about current administrative records procedures can direct their comments to individual members of this group, or can speak directly with the Census Bureau's Administrative Records Coordinator, who chairs this group.

The Principal Associate Director for Programs and program Associate Directors meet regularly to consider a wide range of programmatic issues, including administrative records. Members of the Executive Staff may identify issues in this forum and refer them to the Stewardship Committee.

The Longitudinal Employer-Household Dynamics (LEHD) Program's Executive Guidance Group is comprised of members of the Executive Staff and division chiefs, who provide operational and program guidance on LEHD-related matters. This group does not set administrative records policy, but may identify policy issues that it will refer to the Stewardship Committee.

The following table provides a summarized view of each participant's chief functions in the process of seeking and providing administrative records policy and procedural guidance.

						Census Bureau Staff
Notification	X		X	X	X	
Documentation	X		X	X		
Agenda Coordination			X	X		
Identify Issues		X			X	X
Assignments		X				
Conduct Analysis					X	
Vet Proposals					X	
Make Decisions		X				
Evaluate Process					X	

7.1.3 Supporting Documentation

Appendix F, Administrative Records Role Summary and Key Contacts

7.2 Administrative Records Processes for Policy Development and Procedural Change Control

This section describes the process by which administrative record policies are developed and procedures are changed to address the evolving needs of the Census Bureau's administrative record activities. These processes provide (1) an opportunity for developing and vetting new or amended policies, and (2) steps for managing changes to the administrative record procedures set forth in this handbook.

7.2.1 Policy Development Process Steps

1. **Individuals contact the Administrative Records Coordinator (ARC) with an ADREC policy question.** The ARC first attempts to resolve the question within the parameters of existing policies. If this cannot be accomplished, the ARC puts the issue on the agenda for discussion by CARPP.

2. **CARPP assesses the need for a new or amended policy**, taking into consideration the scope of the issue and its impact on overall Census Bureau activities.

3. **The ARC identifies team members to research the issue and develop a draft policy statement** after CARPP determines that a new or amended policy is

required. This process naturally involves consultation with other Census Bureau staff who may not be members of the CARPP.

4. **The Committee seeks feedback from the Census Bureau division chiefs** whose program areas would be affected once a draft policy recommendation has been developed. The CARPP then incorporates feedback from the division chiefs.

5. **The CARPP returns to the division chiefs to seek final consensus** on presenting the policy recommendation to the Stewardship Committee.

6. **The CARPP presents the recommendation to the Stewardship Committee.** The final Executive Staff decision will be documented by the ARC.

7. **The ARC prepares a memorandum** for distribution to all Project Contacts, Division Chiefs, and Executive Staff that advise them of the new policy. If appropriate, replacement or additional pages to this handbook will be provided. The ARC also will arrange to have the policy posted to the OAES Intranet site.

7.2.2 Procedural Change Control Process Steps

1. **Individuals contact the ARC with an ADREC procedural question or concern.** The ARC first attempts to resolve the question within the parameters of existing procedures. If this cannot be accomplished, the ARC puts the issue on the agenda for discussion by the CARPP.

2. **CARPP assesses the need for new or amended procedures,** taking into consideration the scope of the issue and its impact on overall Census Bureau activities.

3. **CARPP discusses possible alternatives** to address the gap or concern if it determines that new or amended procedures are required. Once consensus is reached on the change, the ARC will document the Committee's decision.

4. **The ARC prepares a memorandum** for distribution to Project Contacts, Division Chiefs, and Executive Staff to inform them of the procedural change. Replacement pages to this handbook are provided as necessary. The ARC also arranges to have all procedural changes posted to the OAES Intranet site.

7.2.3 Documentation Requirements

1. **The ARC prepares an agenda for the CARPP** meetings, based on ADREC policy and procedural issues needing attention.

2. **The ARC prepares minutes** of all CARPP meetings. The minutes document the introduction of new ADREC policy or procedural issues, discussion, and next steps for developing a recommendation to respond to the issues.

3. **The CARPP member(s) assigned to research and develop the issue prepares a written analysis and recommendation**.

4. **The ARC documents feedback** from division chiefs about proposed policy recommendations.

5. **The ARC prepares policy recommendations** for presentation to the Stewardship Committee.

6. **The ARC documents and disseminates decisions** made by the Stewardship Committee.

7.2.4 Roles and Responsibilities

				DSEP
Policy Development:				
Identify need for new/amended policy	X	X	X	X
Entertain questions/issues from BOC staff on ADREC policy/procedures.	X	X		
Develop policy problem statement and recommendation for change	X			
Present policy recommendation to division chiefs	X	X		
Provide feedback to policy recommendation			X	
Prepare policy recommendation for presentation and approval by the Exec Staff		X		
Provide final approval for new/amended policy				X
Disseminate new/amended policy		X		
Procedural Change Control:				
Identify need for new/amended procedure	X	X	X	X
Entertain questions/issues from BOC staff on ADREC policy/procedures	X	X		
Discuss alternatives to current procedures; decide on changes as necessary	X			
Disseminate procedural changes		X		

7.2.5 Supporting Documentation

Charters for the Committee on Administration Records Policies and Procedures (CARPP) and Data Stewardship Executive Policy Committee (DSEP).

Section

8

8. Glossary

Active project status refers to projects in which activities are occurring at the present time. The only projects that are classified as "active" are those in the baseline or those subsequently approved through the U.S. Census Bureau's project review process. Active projects are not subject to additional internal Census Bureau review, but must be included and updated as needed in the Administrative Records Tracking System (ARTS).

An activity is an element of work that is required by the project. It requires resources and takes time to complete. Activities have expected durations, costs, and resource requirements and may be subdivided into tasks. For example, a project may require the acquisition of data from two sources. The project phase is "execution", the work package is "acquisition"; and the activities might include the acquisition of data from source 1 and the acquisition of data from source 2. Activities can further be divided into tasks and subtasks.

Address data are a subset of locator data. It describes one or more data fields that denote the physical or mailing location of an individual or business entity. Address information includes, but is not limited to, rural and STAR route designators, P.O. Box or Postal Drawer designators, city-style addresses with street name and number; apartment, unit, or lot number; and post office and postal state information and ZIP Codes.

Administrative Records (ADREC) and administrative record data, refer to micro data records contained in files collected and maintained by administrative (i.e., program) agencies and commercial entities. Government and commercial entities maintain these files for the purpose of administering programs and providing services. Administrative records are distinct from systems of information collected exclusively for statistical purposes, such as those the Census Bureau produces under authority of Titles 13 or 15 of the United States Code (U.S.C). For the most part, the Census Bureau uses, and seeks to use, administrative records developed by federal agencies. To a lesser degree, it may use information from state, local, and tribal governments, as well as commercial entities

The Administrative Records Coordinator (ARC) in OAES provides overall direction and coordination to program areas regarding internal ADREC policy and external, data-supplier partnerships.

The Administrative Records Tracking System (ARTS) is an electronic database on the Census Bureau's Intranet, accessible through the OAES Web site. It tracks Census Bureau ADREC agreements, agreement commitments, data sets, projects, and relevant external contacts.

ADREC Projects are those that make use of administrative records data. An example of an ADREC project is "Current Population Survey – SSN Validation."

Agreements for administrative records are signed documents between the Census Bureau and other agencies to acquire restricted state or federal data or data from vendors.

Approved projects are either in the baseline or have subsequently been formally reviewed and approved using the Census Bureau's project review process specified in Section 3 of this handbook. All approved projects are documented and tracked in ARTS.

Approved projects, pending initiation are those approved projects that have not yet begun.

Archived project status have been completed or are no longer likely to be conducted. This may include projects that have been "terminated prior to completion" for an extended period and have then been converted to "archived" status.

AutoTrain (Learning Management System (LMS)) AutoTrain is one of two systems that constitutes the Education, Training, and Management Information System Plus (ETMIS+) within the Commerce Business System (CBS). The AutoTrain is a web-based system built with Oracle products, that is integrated with the CFS and that facilitates the scheduling and enrollment of in-house group training at the Census Bureau. In support of Title 26 training verification, the Workforce Development Branch of the Human Resources Division will update employees' training histories as indicated by the Computer Based Training log by entering the course into the Learning Management System (LMS).

Baseline project is any internal or reimbursable administrative records project that was active in November 2000 or reported to the IRS during the 1999-2000 Safeguard Review. Baseline project information must be updated in ARTS as long as they remain active. (See Section 1.3.2)

Budget activity is a group of related programs managed in a coordinated way. Budget activities can be defined from line items in the Census Bureau's budget, and in some cases may represent only one program. An example of a budget activity is "Current Demographic Statistics."

"Business" or federal economic data refer to data collected on economic entities that produce goods or services. The Census Bureau's economic programs use the business concept broadly to include commercial enterprises and noncommercial organizations or institutions, employers and nonemployers, and private-sector and government entities. The business concept *excludes* private households with paid employees whenever those employees primarily support the operation of a residence.

A business organized as a sole proprietorship and the individual who owns it are one and the same. Therefore, administrative-records information about such a business also identifies the owner. The economic programs' statistical activities are concerned exclusively with the entity's business activities and characteristics. The disposition of information about sole proprietorships, including name, address, and taxpayer and other identification numbers, is economic rather than personal.

Economic statistics are the collection of numerical aggregates (macrodata) that describe the operating, financial, ownership, and other characteristics of businesses. When compiled for the purpose of describing populations of economic units, this concept includes data about the demographic characteristics of legal entities (natural or legal persons) that own businesses.

The Business Register was formerly referred to as the Standard Statistical Establishment List (SSEL). It is the business frame for most economic censuses and surveys, and is comprised of Census Bureau data, as well as ADREC data from the Internal Revenue Service, the Social Security Administration, and the Bureau of Labor Statistics.

The Commerce Business System (CBS) provides central financial and administrative support for the Census Bureau, including APMS, BMIS+, purchases, travel, data warehouse, and general administration activities.

Computer Based Training (CBT) is modular training materials available via the Census Bureau Intranet.

Commingled data sets are files that contain ADREC data, such as tax data, along with Title 13-protected data. Such files remain commingled even if the ADREC data use was limited to the sample selection phase. They are typically subject to both Title 13 and any additional, data-supplier imposed restrictions.

Committee on Administrative Records Policy and Procedures (CARPP) is the primary group that monitors and evaluates administrative records procedures and activities. The Committee is responsible for keeping this handbook up-to-date and for considering any changes to related procedures. Members represent each directorate with a role in administrative records.

Completed projects are no longer active, and no additional activity is indicated or anticipated in a reporting cycle, i.e., calendar year. Maintains completed status until such time that its status is converted to "Archive."

The Data Integration Division (DID), Data Management staff provides central coordination for primarily demographic ADREC file acquisition, custodianship, and preprocessing.

Disapproved projects receive disapproval during the project review process. Has the potential to be re-submitted for approval.

The Economic Planning and Coordination Division (EPCD), Register Analysis Branch, provides central coordination of Economic Directorate ADREC file acquisition and pre-processing to support the Business Register, while the Data Stewardship and Management Staff is responsible for proposal review and data custodianship.

External projects predominately meet a Title 13 purpose, but are managed by individuals granted special sworn status by the Census Bureau. They are typically funded by external sources. These projects are usually conducted at the Center for Economic Studies or a Research Data Center.

Federal Tax Returns and Return Information (FTI) is defined in IRS Publication 1075 and 26 U.S.C., Section 6103. It refers to all data about businesses or people received from the IRS. Census Bureau projects using FTI are subject to the disclosure provisions of the Internal Revenue Code — Title 26, U.S.C., as well as the Census Bureau's authorizing statute — Title 13, U.S.C. Files that contain any FTI, along with Title 13-protected data, are referred to as "commingled" data sets.

Internal projects are authorized by Title 13 and managed by Census Bureau employees, including those projects at the Census Bureau under the Intergovernmental Personnel Act Mobility Program. These projects are funded solely by the Census Bureau's appropriated funds. However, the idea for conducting these projects does not necessarily originate within the Census Bureau.

Joint projects predominately meet a Title 13 purpose, while also meeting that of another federal statistical agency. A team consisting of a representative from each

contributing agency typically manages joint projects. Both agencies contribute data and other resources.

Locator data or address data, alone or in combination with other data, may be used to locate a specific person or business. These identifiers include latitude and longitude points, telephone numbers, addresses, and address information.

The Master Address File (MAF) is the decennial census and demographic survey frame, comprised of locator ADREC data. At this time, none of the files in MAF are subject to restrictions beyond those imposed by Title 13, U.S.C.

New projects are subject to the Census Bureau review and approval process described in Section 3 of this handbook. A project is considered new if:

- It is an original idea for a project that has not already been approved.

- It is an approved project for which the scope, status (i.e., goes from one-time to cyclical), methodology, data linkage strategies, data sets, or data uses change.

One-time projects are not recurring. From their inception, it is anticipated that these projects will be executed only once. Research projects are often one-time activities. If such a project is successful, and the program area chooses to execute it again, it would be considered new and would therefore require review under the process described in Section 3 of this handbook.

Pending projects are those awaiting project review completion.

"Person" or demographic data are data about people or households, including counts, and demographic and housing characteristics. Personal identifiers include individual and householder names and social security numbers (SSN). These two types of identifiers allow identification of specific individuals. Demographic (person/household) statistics are the collection of numerical aggregates (macrodata) that describe the social, economic, and other characteristics of human populations.

Personal identifiers are defined as (1) individual and householder names and (2) SSN. These two types of identifiers allow identification of specific individuals.

A Project is a set of activities that has a distinct mission and clear starting and ending points. A project has a life cycle that proceeds from conception to planning, execution, and termination. There is generally a single point of contact for each project. A project is often part of a broader program and is a building block in the design and execution of program goals. Dependent relationships may exist between

projects. For example, one project may require output from another. Finally, projects may be directly attributed to accounts in the Census Bureau's accounting structure. An example of a project is "Conduct 2001 Current Population Survey."

The Project Contact (PC) is the individual responsible for documenting a project proposal in ARTS and shepherding it from the review stage through implementation.

Reactivated projects are ones that became inactive (perhaps due to ADREC data unavailability) but are now active again.

Recurring projects are typically sets of discrete production activities that are periodically repeated within a program. The project cycles are defined at their inception as having specific starting and ending points, with the associated activities repeated periodically. Predefined production cycles could be quarterly, annually, biennially, quinquennially, decennially, or some other period. As long as the methodologies, types of data, and data linkage strategies used to create a product are unchanged over time, the project is not "new" despite the fact that it occurs more than one time. Examples include production of the annual Intercensal Population Estimates and maintenance of the Business Register. Information about the project must be updated in ARTS for each cycle, but no additional review and approval is required, unless a change occurs that would characterize subsequent activities as a new project.

Research Data Center (RDC): Secure facilities which provide the data user community with limited access to non publicly available data collected through a variety of Census Bureau surveys and censuses. Each RDC is a partnership between the Census Bureau's Center for Economic Studies (CES) and a local-area non-profit organization. The RDCs were established to improve the quality and utility of Census Bureau data by encouraging and supporting partnerships with researchers throughout government, academia, and business to conduct analytic research of mutual benefit and meeting statutory requirements.

Reimbursable projects are those for which the Census Bureau receives payment (in part or in total) from a customer for products or services rendered.

Special sworn status (SSS) is conferred upon individuals to whom the Census Bureau approves access to confidential Census Bureau data in furtherance of a Title 13 purpose. Project Contacts must ensure that specific background check and training requirements are met prior to SSS individuals accessing ADREC data.

Terminated before completed refers to projects that are inactive and not expected to resume.

Work Packages are deliverables. Work packages may be divided into activities and used to identify and control work flows in the organization. Each project phase can be broken into specific actions required for completion. Work packages are SMART: "Specific, Measurable, Agreed upon, Realistic, and Time Bound Actions." As an example, the project phase "execution" can be divided into work packages exhibited below:

Procure materials

Build and test operations

Develop a support structure

Produce a system

Verify performance

Modify the system as required

Work packages often represent a group of activities.

Note: Some of these definitions are based on ESI International's, *Project Management Terms: A Working Glossary,* J. Leroy Ward, editor (Arlington, VA, 1997). They are expanded with examples relevant to the Census Bureau. ESI International is widely recognized as the source for information on project management.

Appendices