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NATIONAL STATE DATA CENTER STEERING COMMITTEE

*Representing a Network of 1,800
State Data Centers and Affiliates Nationwide*

Allen Barnes (AZ)
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Suzan Reagan (NM)
Pam Schenker (FL)
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We Bring Value-Added Census Data and Education to the User

October 23, 2017

Desk Officer for Commerce
Office of Information and Regulatory Affairs
US OMB
725 17th Street NW
Washington, DC 20503

To whom it may concern—

The Department of Commerce has issued a request for comments concerning information collection by the Longitudinal Employer-Household Dynamics program, a program administered by the Census Bureau. (online: <https://www.federalregister.gov/d/2017-21082>)

I am writing on behalf of the Census State Data Centers (SDC) Steering Committee to offer our comments. The SDC network includes organizations from 56 states and territories that partner with the Census Bureau to provide training, technical assistance, and extension of Census products. The Steering Committee represents the interests of the participating organizations and coordinates the network's national activities with Census Bureau staff.

Our members **fully support** the continuation of the LEHD program. LEHD is a great, proven example of federal-state cooperation in the assembly of administrative records data and the harnessing of “big data” to answer research and analysis questions. Applied uses by state and local agencies include transportation planning and network modeling projects, local service analyses, and workforce and affordable housing needs analyses. The data products of the LEHD program do not capture much public attention – but are well-known and relied upon by state and local agencies.

With regard to paperwork reduction and respondent burden, the LEHD program makes use of administrative data already collected by federal and state agencies. Thus the additional paperwork burden for data subjects is zero.

Our SDC Steering Committee considers LEHD a valuable and necessary source of local workforce, employment and commuting statistics. Importantly, the LEHD program provides statistics with descriptive details and local geographic granularity that are not available from

any other federal statistical program. We encourage US OMB to clear the proposal of continued collection of information by Census Bureau's LEHD program.

Thank you for your attention to our comments. Our steering committee can be reached at todd.graham@metc.state.mn.us, or by US mail: Todd Graham, Metropolitan Council, 390 North Robert Street, St. Paul, MN 55101.

Sincerely,

Todd Graham
Chairman, Census SDC Steering Committee

cc: Allen Barnes, Arizona Office of Economic Opportunity
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