

AN UPDATE ON ESTABLISHMENT REPORTING ISSUES: PRACTICAL CONSIDERATIONS

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INTRODUCTION

These are strange times for the statistical use of administrative records. At a time when statistics from sample surveys and censuses are contracting, it would seem reasonable for the community of statistical users and statistical agencies to turn to increased and improved utilization of administrative records. This has not happened, however, partially because of the effect of budget cuts on the utilization of administrative records.

Most users are painfully aware of the effects of budget cuts on sample surveys and censuses. A number of user groups have compiled "casualty lists," which include such things as:

- decreased sample size for Current Population Survey
- reduction of number of occupations in the Occupational Outlook Handbook
- cancellation of 1982 Annual Housing Survey

There are very few lists, however, that consider the effects of budget cuts on administrative record data sources. One of the reasons for this is that the effect on administrative records, and eventually on statistics produced from those records, is much more insidious and difficult to trace.

An example is the fact that, as State Employment Security Agencies experience funding cuts and staff reduction, there has been an observable decrease in the timeliness and quality of data which they provide to the Bureau of Economic Analysis (BEA) from Unemployment Insurance (UI) records. The effect on personal income estimates for States and counties is even more difficult to identify and by nature of a longer range. Initially, this has meant that--even though the agency has itself experienced staff reductions--BEA has been forced to devote more effort to preparing estimates for States whose reports are late, and to edit the data received more intensely for possible errors to refer back to the State agency for investigation or verification. Ultimately, this will take its "toll" on the reliability and timeliness of the personal income estimates.

The effects of budget cuts include not only decreased availability and reliability of statistics that have been produced from administrative records, but also increased difficulty in obtaining changes and improvements necessary to new statistical uses. It is the second category of effects that is addressed here.

The lack of a uniform set of establishment codes and definitions among administrative record systems is a major deterrent to increased and improved statistical use of administrative records. This problem of nonuniform establishment reporting, which in some cases is inadequate for statistical purposes, has received considerable attention in recent years because of increased emphasis on using administrative records to generate necessary statistics in lieu of the more expensive sample survey approach.

The importance of the problem is illustrated by the fact that a major new administrative record

data source, with powerful potential statistical applications, continues to go largely unutilized--if not unnoticed--by the statistical community because of serious establishment reporting problems. That system is the one assembled by the Social Security Administration (SSA) from Forms W-2 and W-3, which will present possibilities for the creation of powerful data bases for the measurement and analysis of economic activity and demographic changes for subnational areas. The realization of these possibilities, however, requires improvements in the way in which establishment units are reported and coded. There is potential for such improved records to provide much needed statistics on a current and geographically detailed basis. These potential uses could yield improved statistics, at low cost, with less reporting burden for employers.

BACKGROUND

There was a rapid increase in the 1970s in the demand for subnational statistics. This was partially because of new Federal programs, such as Environmental Protection, that required geographically detailed information for environmental impact statements. It was also partially due to General Revenue Sharing, and a number of other formula-type grant programs enacted in the 1970s. Finally, managers at all levels of government expressed interest in economic statistics that would allow them to pinpoint areas of need and thus "target" government services to the most needy populations.

There was not, however, a corresponding increase in the amount of subnational statistics available because, with few exceptions, there were no new source materials upon which to base the statistics. Current economic statistics for the Nation and for large regions are produced from ongoing sample surveys, such as the Current Population Survey. It is not economically nor politically feasible, however, to conduct sample surveys large enough to yield geographically detailed time series statistics.

There are relatively few administrative records sources that are comprehensive enough to produce current economic statistics for all areas of the Nation, and those existing few were already heavily in use by the end of the 1960s. Differences in statistics relating to the same subject (employment or wages generated in a given State or county, for example) derived from different administrative record sets have been a subject of concern among statisticians and economists for many years. Differences between administrative record based and census or sample survey based statistics have also been of concern, particularly to Census Bureau staff, who have used administrative records as sampling frames for statistical surveys and to evaluate census results.

These inconsistency problems are perhaps most evident, and most important, at the Bureau of Economic Analysis, where a wide variety of statistics--administrative, survey, and census--are used to construct national, regional, and international economic accounts that provide both an

overview of economic activity and the basis for a detailed analysis of interrelationships among components of the national, regional and international economies. Since, with very few exceptions, the Bureau does not collect information directly from the public but utilizes available statistical and administrative record sources, the statistical inconsistencies are at best troublesome and at worst critically important to the accuracy of the nation's economic statistics.

Although administrative records are used heavily in the national and international accounts, they are most important to the regional accounts where sample survey statistics are generally unusable.

STATISTICAL USES OF ADMINISTRATIVE RECORDS (SUAR)

Subcommittee on SUAR

Partially in response to the problem of inconsistent statistics, and partially in response to a growing interest in the use of administrative records to generate multipurpose statistics, the Federal Committee on Statistical Methodology established a subcommittee on the Statistical Uses of Administrative Records (SUAR). This subcommittee, chaired by Daniel Garnick of the Bureau of Economic Analysis, studied the extent of administrative record usage in the Federal statistical community, potential new statistical uses, and problems that inhibit more extensive use of administrative records for statistical purposes. The subcommittee produced a report that was published as Statistical Working Paper No. 6:

Report on Statistical Uses Of Administrative Records.

Administrative Records Subcommittee

One area that the SUAR did not research was possible remedies for the problems which it had identified in the statistical use of administrative records. The SUAR made a number of broad recommendations regarding improved use of administrative records, but these were so general in nature that a second subcommittee was established to encourage and to research specific actions necessary to implement the SUAR recommendations.

Establishment Reporting Work Group

The Administrative Records Subcommittee, chaired by Fritz Scheuren of the Internal Revenue Service (IRS), created a number of work groups, one of which was formed to study the possibilities and problems involved in implementing two of the recommendations that concerned the manner in which employers file administrative reports for establishments.

The first of these was SUAR recommendation #1, which called for common identifiers to be used wherever possible in the various administrative record systems in collecting information pertaining to the same individuals or organizations. The Establishment Reporting Work Group has interpreted this to mean that, for businesses, a uniform set of codes should be utilized to identify a company, an establishment, a State and county, and an industry. The Unemployment Insurance (UI) and Standard Statistical Establishment List (SSEL) files contain the Federal Information Processing Standards (FIPS) codes for geographic areas and, although the SSA and IRS use a different set of codes, they can generally be translated into FIPS codes without problem. All of

the major systems are based on the Standard Industrial Classification (SIC) codes and definitions for industries (although there are substantial differences in the way in which the codes are assigned). The Employer Identification Number (EIN) assigned by IRS identifies a legal entity, which is not necessarily a company, and it is not present in the BLS records for all States, but it is very close to a uniform identifier for employers. There are no such uniform identifiers, however, for establishments or reporting units.

The second area of concern for the Work Group was SUAR recommendation #3, which calls for consistent procedures to be used in administrative and statistical data collection efforts for defining reporting units, identifying and coding reporting unit characteristics, and developing standards for data tabulations. The authors interpreted this to mean that the SSEL definitions and codes for establishments should be adopted (to the extent possible) by administrative reporting systems. The authors feel employers should be asked (required?) to report to SSA and BLS by the same establishment units and codes as they report to the Census Bureau.

The Work Group recognized the existence of numerous record systems, which contain reports for business establishments, but limited itself to three major comprehensive systems: (1) Unemployment Insurance (UI) records collected by each State under rules and procedures established and coordinated by the Department of Labor; (2) the W-2 and W-3 records collected by the Social Security Administration (SSA) for both SSA and IRS administrative purposes; and (3) the Census Bureau's SSEL records. The IRS tax return files for businesses were omitted because the work group recognized that these are company, rather than establishment, records and there is little probability that the tax legislation will be changed to require separate returns for each establishment.

The Work Group identified three tasks: (1) Document the three selected establishment record systems; (2) identify the factors contributing to statistical inconsistencies among the three systems; and (3) study the possibilities and problems involved in implementing the SUAR recommendations.

Documentation

In the process of collecting documentation on the three major systems, the Work Group discovered that there are no administrative record systems that presently collect establishment records. Despite the fact that SSA operates an "Establishment Reporting Plan" and the BLS publishes "establishment data," both systems contain records for reporting units rather than establishments. Reporting units are generally defined as a single industrial activity within a county. Multiple establishments with the same industrial activity within the same county (such as retail stores) may be combined into a single reporting unit.

The SSA and SSEL systems begin with the same source document--the employer's application for an employer identification number (IRS form SS-4). This form signals the "birth" of a new employer, and indicates whether or not that employer operates more than one place of business. The UI system also utilizes Forms SS-4, but relies

primarily upon State employer registration forms. Although the systems utilize similar information to identify a new employer, the ways this information is processed to identify multi unit employers and request separate reports differ considerably among the three systems. The way in which expansions of single unit employers to multi unit are identified can be important, since most new businesses begin as single units.

Although in principle the BLS and the SSA systems should have nearly identical reporting units, there are significant differences in the way the two systems operate that lead to different reporting units.

The BLS system is actually a collection of separate State systems. Each State Employment Security Agency collects the records from employers under BLS guidelines and its own State laws. There are differences among the State data systems in the type and amount of information collected, and in the record systems established.

The SSA system, in contrast, is centralized. The SSA operates an "Establishment Reporting Plan" (ERP) that seeks to collect separate reports for each reporting unit. The ERP is a voluntary plan, whereas in the UI system, separate reports for each county/industry are required under Federal legislation (although not strictly enforced by the States). The SSA sends a form to each new employer who indicated more than one place of business on the SS-4. This form (5019) requests information for each reporting unit, including address, number of employees, and industrial activity. State, county, and industry codes are assigned to the reporting unit by the SSA.

Other important differences between the BLS and the SSA systems are the way in which reporting unit numbers are assigned. In the BLS system, reporting unit numbers are assigned by the State UI staff, whereas in the SSA system the employers assign the numbers. While both systems will incorporate, on an ongoing basis, new information supplied by employers, systematic updates are handled differently. In the BLS system, employers are asked every 3 years to "refile" SIC classification forms for each reporting unit. In the SSA system the codes for large employers are updated approximately every 5 years from correspondence.

The SSEL was designed, as its name implies, as an establishment directory. It is a combination of administrative records (SS-4, IRS 941, SSA 5019, IRS Business Master File) and statistical records (Company Organization Survey, economic surveys, censuses). Although the file was originally intended as an interagency directory, access to the file is currently restricted to Census Bureau personnel because of confidentiality provisions contained in Census legislation. The SS-4 is the primary source for employer "birth" information. For single-unit employers, county, industry, employment, and wage information is initially based on SSA records, then updated from economic censuses. For employers who have more than one place of business, however, the primary source of information is the Company Organization Survey (COS). This Census Bureau survey covers all multiunit employers every 3 years, and large employers each year.

The COS, in contrast to the BLS and SSA

systems, asks for separate information for each establishment. The Census Bureau assigns a 4-digit identification code for each establishment. The same identification codes are also used for economic census and other Census Bureau reports.

The SSEL was therefore considered by the work group to be the standard for adoption in the administrative record systems.

Statistical Differences

The structure of the three systems outlined above would suggest that the BLS and SSA systems, with the exception of occasional coding or processing differences, contain identical reporting units with similar employment and wage information, and that the SSEL would contain additional units which, when grouped by county, would approximate the reporting units of the other systems. The evidence, however, suggests otherwise.

A number of studies have been conducted that compare statistics from the BLS, SSA, and County Business Patterns (CBP--based on the SSEL) programs. Most have been initiated by the agencies involved in producing the statistics in an attempt to explain differences between their statistics and those produced by other systems. What these studies have in common is that they have found significant differences to exist, particularly among regional statistics by industry, but few of the studies have identified the factors responsible for the differences.

The Establishment Reporting Work Group identified as one of its tasks a study to shed more light on the extent and nature of the establishment reporting problem. The study proposed was a match of the reporting unit/establishment records for one State. Only a microstudy of records for reporting units--opposed to the usual study of the economic aggregates for areas and industries--will yield the desired information on the nature and extent of establishment reporting problems.

The proposed study would address two questions: (1) How much of the discrepancy in statistical results is due to coding and processing differences (the causes of which are being investigated by another work group of the Implementation Subcommittee) opposed to reporting differences; and (2) How much of the reporting difference is accounted for by cases where different information is reported for the same units, and how much by cases where different units are reported?

It became clear early in the project that confidentiality restrictions would be a major stumbling block. The approach that was considered to be most workable was to compose a letter to senior managers of SSA, BLS, and Census, requesting Subcommittee access to the necessary reporting unit records for the study. It was felt that the study must be well specified and the letter carefully composed and sent from the Office of Management and Budget.

A task force established to develop specifications felt that, before it could further develop the specifications for a microstudy (to a sufficient degree that a letter could be drafted to request the microdata), a "macro" comparison should first be done (for all States) to determine the extent of the statistical discrepancies among the three data systems, by State and by industry. Even the macrostudy ran into confidentiality problems, however, as well as definitional and timing problems among the three systems. The

SSA employer file, for example, does not contain current employment and payroll information. Such information must come from the 1 percent CWS, which is not yet available for 1979. It would be very difficult and expensive, however, for Census to develop a file reflecting 1978 SSEL information. These difficulties underscore the problems of working with administrative records, noted in the SUAR report, and make it even more important that a microstudy be conducted.

The Work Group decided to compare the number of reporting units among the systems, by State, by industry, and by employer size class (to the extent feasible). Such a focus would provide information on the extent of the discrepancies, avoid definitional and conceptual problems associated with a comparison of employment, avoid confidentiality problems associated with a comparison of payroll, and provide the necessary background for the microstudy. Even here, however, there were problems to be resolved before the data files could be matched and tabulations prepared. A tabulation of central administrative offices by State and industry had to be prepared by Census before the Census distribution of reporting units could have been compared with BLS distribution (which included central administrative offices with the industry associated with that employer). Additionally, the SSA employer file had to be purged of all reporting units that were inactive in 1979, and the resulting file tabulated by State and industry.

The recent budget cuts and associated increase in workload has made it very difficult to proceed with reasonable speed on a project such as this study, which is not part of any agency's mission or manager's official duties.

Implementation Considerations

The Work Group's primary function was to study the possibilities and problems associated with the implementation of SUAR establishment reporting recommendations. An implementation study was therefore planned as the third, and central, task of the Work Group. Both the documentation task and the study of the extent and nature of reporting problems were designed to provide information for the implementation study.

The Work Group decided to limit the implementation study to the SSA system. The BLS system was considered to have a far more difficult implementation problem because of the Federal-State nature of the program, the greater frequency of reports, and the greater reporting burden for employers. The question to be addressed by the implementation study therefore became: Can the SUAR recommendations concerning common identifiers and establishment reports be implemented in the SSA system based on W-2 and W-3 forms? If so, what are the costs and benefits of implementation? If not, what are the barriers to implementation?

The implementation study had three major elements:

1. Identification of a feasible (given present confidentiality restrictions) method of implementing the recommendations in the SSA system.
2. Consideration of the willingness of employers to comply with an SSA request for establishment reports, given the voluntary nature of the ERP.
3. Assessment of the costs and benefits of implementing the recommendations. Costs include the direct costs of preparing and mailing addi-

ional W-3 forms, and of processing the expanded number of reports and larger employer file, as well as indirect costs such as lower employer participation in the ERP. Benefits include improved statistics and reduced costs (through a simplification of the ERP), which may offset or exceed the increased costs associated with the larger number of reporting units.

--Approach

The identification of an implementation approach for study drew upon previous discussions between SSA and Census. It had been determined by prior discussions that while the Census Bureau could not provide its SSEL file to the SSA, it could assign industrial and geographic codes to the SSA employer file and return it to SSA. The implementation problem therefore centered on the question of how SSA can identify to employers what Census establishment units (and codes) should be used for W-3 reports. It was noted that it is often different persons--or even different corporate units--who provide SSA reports from those that provide Census reports. Other issues included concerns over how SSA can monitor the establishment reporting and distinguish between reports filed on the new basis (with Census codes and units) from those on the old reporting unit basis, as well as concerns regarding how the SSA employer file can be kept up to date with the constant flow of employer and establishment changes.

The approach that the Work Group identified for investigation was as follows:

1. The SSA would send letters to all multiunit employers advising them of the change and requesting a list of establishment numbers (possibly addresses?) used on their most recent Company Organization Survey (COS).
2. The Census Bureau, in conjunction with its COS, would remind employers to use the same units and numbers when filing W-2 and W-3 forms.
3. The Census Bureau would precode W-3 forms (or the peel-off address labels) with the 9-digit employment identification number and the 4-digit Census plant number (which would become the universal establishment code), as well as the employer's name and address. The precoded forms would be mailed to all multiunit employers by Census, SSA, or IRS, with a letter requesting that W-2 forms be grouped accordingly.
4. The precoded W-3 forms received at SSA would form the basis for a new SSA employer file, to be forwarded to Census for assignment of industry and geography codes. Multiunit reports received by SSA without the precoded W-3 forms would be assumed to be on the old reporting unit basis.
5. Establishment changes received by SSA during the year would be forwarded to Census on an ongoing basis so that they could be reflected in the next set of precoded W-3 forms. Additionally, the annual match between SSA and Census employer records would provide Census with yet another check on the currency of its file.

--Feasibility

The Work Group met with representatives from Census, SSA, and IRS to explore this approach. The timing of this investigation was unfortunate, since most agencies were preoccupied with an impending round of budget cuts. It was generally felt that the outlined approach was unworkable,

for the following reasons:

1. The Census Bureau may be unable to provide SSA and IRS with a precoded set of W-3 forms, and it would be very hesitant to get involved with anything as closely related to administration of the taxing system as mailing W-3 forms.

2. It is not entirely clear that the Work Group's assumption that SSEL geography and industry codes can be provided to SSA is correct.

Accordingly, the Work Group determined that if Census-SSA-IRS cooperation was unlikely, it would be impossible for the SUAR establishment reporting recommendations to be implemented at SSA at that time and that this should be reported to the Implementation Subcommittee. It was not thought worthwhile to investigate other approaches, such as an independent effort at SSA to convert the present ERP to an establishment basis. The increased cost of an expanded ERP, the duplication of effort, and the increased reporting burden all make this an impractical and undesirable alternative. A new reporting system should yield cost savings to the government and lighten the reporting burden for businesses.

--Costs

The third element of the implementation study--assessment of costs and benefits of implementing establishment reporting in the SSA system--was begun by the Work Group. One of the major costs was identified as the cost of mailings to multi-unit employers. Although there are approximately one million establishments (according to SSEL estimates), the mailings would be approximately 250,000 multiunit EINs, belonging to less than 130,000 companies. Under the optimum approach, it would include the cost of precoding W-3 forms for the one million establishments before mailing to the 250,000 EIN addresses. No attempt was made to prepare an estimate of this cost.

Another cost would be SSA processing costs for the increased volume of reports. Since the number of W-2s to be processed would be unaffected (approximately 180 million), the increase in SSA processing would be modest (from approximately 600,000 W-3s for reporting units to one million W-3s for establishments).

Additionally, there would be some increased reporting burden on employers because of the necessity to keep records by establishment so that W-2s could be grouped and W-3s prepared for each establishment. (Although presumably the firms already maintain employment and payroll information by establishment in order to respond to the Census Company Organization Survey.)

--Benefits

There would be substantial benefits to adoption of an SSEL-based system that, aside from the benefits of improved statistics, may offset the additional costs and result in a net gain both for the Federal Government and for the employers.

Offsetting the increased costs would be the potential savings associated with eliminating the present SSA Establishment Reporting Plan. There may be other savings, but this potential savings may alone be enough to offset the W-3 coding, mailing, and processing costs.

Offsetting the increased reporting burden for employers to group W-2s by establishment is the decreased burden associated with discontinuing form 5019 as well as related forms and correspondence related to the ERP.

The fact that the Establishment Reporting Work Group stopped short of its original objectives is evidence that it is more difficult than ever to obtain needed improvements in administrative records. The Work Group did make significant progress, however, in identifying the issues that require attention and in identifying possibilities for further exploration.

Employer Reporting Unit Match Study Work Group

Armed with a "never say die" attitude and a determination to continue, a follow-up group was immediately formed within the Administrative Records Subcommittee. Represented on the new work group are representatives from the Bureau of Labor Statistics, the Internal Revenue Service, the Social Security Administration, the Bureau of Economic Analysis and the OMB Office of Information and Regulatory Affairs. Not only would this new group continue examining some of the establishment reporting issues already identified by the previous Work Group (with a new focus and in a different direction) but it could at the same time begin to address a topic selected by the Federal Committee on Statistical Methodology for study--the need for interagency sharing of statistical data files.

In light of the difficulties encountered by the previous Work Group, the new group agreed that the objectives and tasks to be undertaken should be items that the members felt were achievable and could be controlled by the group. The group determined that its primary objective would be to conduct a pilot study designed to match information, at a micro-data level, from employer wage reporting and establishment reporting systems at the BLS, the IRS and the SSA.

Thus, the name Employer Reporting Unit Match Study (ERUMS) Work Group emerged. This micro study would differ from that proposed by the previous work group in that it would focus on the reporting unit relationships between the BLS and SSA systems, with the employer information at IRS. This type of study would allow the group to carefully examine and gain insight into the differences and similarities of the three systems so that recommendations might be made regarding what needs to be done to implement recommendations 1 and 3 made by the original SUAR Subcommittee. In conducting the study the group would also gain valuable experience in learning what it takes to accomplish interagency data file exchanges under current regulatory constraints. Additionally, the group hoped to learn from the pilot study how a cooperative interagency data exchange could be used to identify and correct errors, deficiencies and shortcomings in the systems of the participating agencies.

As of the initial writing of this paper, the ERUMS Work Group has met just a few times. At these meetings members have concentrated on outlining plans for the study, with discussions focused on defining directions and areas requiring attention. So far the Work Group has considered and acted on the following:

Scope of Study

It was decided that a sample of records should be selected from one State for the pilot study. Considering the size of the Work Group and the resources available to it, this would give a manageable number of records with which to work and thoroughly examine the match results.

Data Access

It was clearly recognized from the beginning that, because of current restrictions on the release of identifiable information, careful consideration must be given to the steps to be taken for the group to gain access to and use the required microdata records. Instead of the approach outlined by the previous group, this group felt that it would be necessary to conduct the study under inter-agency agreements between the participating agencies. Extensive discussion centered around what the terms of such agreements would be. It is very important that these agreements contain well defined statements as to the purpose of the pilot study and assurances as to the protection of confidentiality of identifiable information.

Data Sources

Each participating agency identified the files from its system that could be made available for the match study, given a satisfactory outcome of the access issue. The SSA can provide records from its master file of employers which contains information used to code geography and industry for workers in statistical files and from records of employer wage reports furnished on Form W-3 (Transmittal of Income and Tax Statements). The IRS will provide records of information from Forms 940 (Employer's Annual Federal Unemployment Tax Return), Form 941 (Employer's Quarterly Federal Tax Return) and Form W-2 (Wage and Tax Statement). BLS intends to furnish employer information from reports that States are required to file under the Unemployment Insurance program and summarized in their ES-202 report.

Data Processing

The BEA has offered its services in performing the electronic data processing that will be required for the micro-data match. An appropriate sample of records from the BLS, SSA and IRS systems for the one State will be selected and matched based on a set of variables yet to be determined. The group has recognized that they will have to perform a substantial amount of manual data processing after the electronic match is done. An examination and analysis of the matched and unmatched records will be a key part of the pilot study and should provide the work group with much of the information needed to meet its objectives.

Now that the groundwork for the pilot study has been laid, the ERUMS Work Group must get on with its business of finalizing arrangements, working out the details for each specific task, conducting the study and reporting the results. Progress to date has been slow and obviously much work remains, but there persists a determination to overcome existing obstacles and keep plugging away at these important issues on establishment reporting.

CONCLUSIONS

Further progress in the statistical use of administrative records requires the resolution of some very serious problems, including inadequate and inconsistent reporting practices. Establishment reporting may be one of the most important issues facing the statistical community. It is a key to improved coordination among data sources and expanded use of administrative records. Decreased sample sizes and the general decline in resources

available to statistical agencies have made it more important than ever before to develop new lower cost methods of generating necessary general purpose statistics from administrative records. Such uses are severely hampered by the noncomparability and data quality problems caused by inadequate establishment reporting.

The availability--for the first time--of machine readable files of W-2 and W-3 records adds an urgency to the establishment reporting issues. The file of W-3 reports--if it were properly coded by geography and industry--would provide a valuable new resource for employment and income estimates (at perhaps a subcounty level). A large sample of W-2 forms could provide similar information on a place of residence basis, information on the characteristics of wage earners, as well as migration--and perhaps even commutation--data on a current basis. It is necessary to act now for the statistical community to have a useful file available by the end of the decade.

The resolution of establishment reporting issues will require the focused attention of the entire Federal statistical system. For example, the SSA--unlike the Department of Labor, which distributes funds on the basis of statistics from the UI program--has very little program incentive to improve the geographic and industrial data produced from its records. Such initiatives must come from the statistical agencies and others who use the data. It is essential that renewed support be given to these continuing interagency activities.

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