

# Washington Center for Equitable Growth

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To Whom It May Concern:

The Washington Center for Equitable Growth strongly supports the proposed rule REG-123376-22. Equitable Growth is a nonprofit research and grantmaking organization dedicated to advancing evidence-backed ideas and policies that promote strong, stable, and broad-based economic growth.

Administrative tax data from the Internal Revenue Service is critically important for measuring and understanding income and wealth in the United States. A recent report from the Committee on National Statistics that investigates the creation of an integrated system of income, consumption, and wealth statistics suggests that administrative tax data [could serve as the “spine”](#) of this ambitious system. The spine is the initial population data to which surveys and other administrative data sets would be linked. The relatively comprehensive nature of tax data makes it an ideal base for this purpose.

Such a system would provide policymakers with new insights on economic inequality and mobility in the United States and could lead to a range of new federal statistics that would give policymakers detailed intelligence on the economic well-being of households across the country. This spine is most useful, however, if it contains as many sources of income as possible alongside geographic and demographic details. The proposed rule would greatly expand the amount of tax data available to the U.S. Census Bureau, allowing the creation of comprehensive federal statistics on income that offer disaggregation by demographic characteristics and geographic locations. Future Census research using these data could include more accurate program evaluation with granular breakouts of what kinds of places or people benefit most from a program.

Over 10 years of grantmaking, Equitable Growth has awarded grants to more than 400 researchers in the social sciences. These and other academic researchers also would benefit enormously from the proposed rule. The Census Bureau can make these data available to researchers in Federal Statistical Research Data Centers. With the implementation of appropriate disclosure protections by Census and in these secure environments, these data will be invaluable for researchers investigating a huge range of topics.

Equitable Growth grantees have used IRS data to study economic mobility, the costs of hurricanes, how people make decisions to migrate within the United States, and much more. The U.S. Department of the Treasury’s Advisory Committee on Racial Equity rightfully sees this work as [essential to the administration’s equity agenda](#) because of the many

avenues it will open to help researchers understand the impacts of race, gender, education, and place in the U.S. economy.

The disclosure of these data to the Census Bureau is consistent with section 6103(j)(1)(A) of the U.S. Tax Code, which grants the U.S. Department of Commerce broad access to these data if they are used for authorized statistical activities. The Census Bureau has an impeccable record of protecting the privacy of U.S. residents. Granting it these additional data will greatly facilitate economic research and comes with low risk to privacy. The Washington Center for Equitable Growth therefore supports this rule and encourages Treasury to cooperate with the Census Bureau on future requests.

Sincerely,

Austin Clemens  
Senior Fellow  
Washington Center for Equitable Growth