

**NATIONAL
STATE DATA CENTER
STEERING COMMITTEE**

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*Representing a Network of 1,800
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We Bring Value-Added Census Data and Education to the User

March 31, 2021

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

Dear Acting Director Dr. Jarmin,

The State Data Center (SDC) network is proud to be one of the longest and most successful Census partnerships with over 40 years of collaboration. SDCs share the Census Bureau goal of providing accurate data to serve the needs of all communities in the nation, and the SDC network continues to serve the nation by promoting the dissemination and use of the reliable and accurate data about ourselves a healthy democracy requires.

On behalf of the 57 state, and territory entities and the 1400 affiliate agencies that comprise the State Data Center Network (SDC), we, the National Steering Committee wish to thank The Bureau for assuming the enormous and difficult task of protecting the quality of our nation's public data by protecting the privacy of its survey respondents and ensuring the transparency demanded by our citizens in this ever-evolving climate of security and privacy. We appreciate The Bureau's commitment to data that can support the priority use cases such as redistricting and administration of the Voting Rights Act, while meeting its responsibility to protect the confidentiality of our respondent's data through the Disclosure Avoidance System (DAS).

We are grateful to The Bureau for allowing our input into DAS development. Our many concerns have been stated through these channels, but as final DAS decisions are being made for application to 2020 Census data we must mention local, practical data concerns.

State statutory law commonly requires that policy and policy applications be based on population, such as: representation on State Boards, taxes and fees, thresholds for the establishment of government entities and programs, and annual State revenue distributions to local governments. Variance in data quality caused by the DAS will misdirect already scarce funds harming budgets, services, and the people who rely on them. Since Census data is a common input in forecast models, the DAS variance will be exaggerated in forecasts further harming communities who rely on accurate planning and budgeting.

Emergency response and disaster recovery and mitigation depend on accurate data at small geographic levels. Census data are critical for this planning as evidenced in the wildfires, tornadoes, and hurricanes that occurred in 2020.

Similarly, accurate Census data are essential inputs to population estimates required for vital statistics, disease and injury incidence, and public safety analysis and planning. This has been clearly shown in local responses to the COVID-19 Pandemic.

To assist the Census Bureau in avoiding these dangers, the SDCs urge that the total privacy budget be set at a point that appropriately protects privacy while maintaining the highest accuracy possible. We also urge that the same invariant rules used in the 2000 and 2010 Censuses - Total Population, Total Voting Age Population, Total Occupied Housing Units, and Total Number of Group Quarters by Type - be applied to the DAS to the census block geographic level.

These adjustments to the DAS will result in improved data quality from the Decennial Census which is the only source of data for small geographic areas and is the foundation for important estimates such as the American Community Survey. For data are to be useful, the difference between enumerated and reported values for demographic and housing characteristics must be kept to a minimum for all geographic levels—with the smallest differences maintained for the most smallest political entities such as tribal areas, counties, and incorporated places (or places within counties for places located within more than one county) allowing differences to increase for smaller statistical areas such as tracts, block groups and blocks so long as aggregated data remain consistent with larger, reported, geographies.

We recognize that the implementation of DAS will impact not only 2020 Census data products but also Census survey products in the future. To better facilitate this transition, we urge the Census Bureau share strategies and plan for Census data products including methodology, tables, timing, and known data quality metrics for those releases. Privacy protected microdata files from the 2010 Census should be provided for these releases prior to any final decisions regarding the privacy budget. Through such engagement, the SDC partnership can better support Census data releases and our common goal of appropriate application of Census data.

These adjustments will continue the Census Bureau's well-earned reputation for producing high quality data and protecting the privacy of respondents. As dedicated local partners, the State Data Centers will continue to support the US Census Bureau in our common task of serving the data needs of every community in the nation.

Our steering committee can be reached by email: Bob.Coats@osbm.nc.gov, or by US mail: Bob Coats, North Carolina Office of State Budget and Management, 116 W. Jones Street, Raleigh, NC 27603.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bob Coats', with a stylized flourish at the end.

Robert Coats, chair
State Data Center Steering Committee

CC:

U.S. House of Representatives Committee on Oversight and Reform

U.S. Senate Committee on Homeland Security and Government Affairs

Dr. John Abowd, U.S. Census Bureau, Chief Scientist and Associate Director for Research and Methodology

Mr. Burton Reist, U.S. Census Bureau, Assistant Director for Communications

Ms. Misty Reed, U.S. Census Bureau, Chief, Customer Liaison and Marketing Services Office

Ms. Lakiva Pullins, US Census Bureau, Assistant Division Chief, Customer Liaison and Marketing Services Office

State Data Center network

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Federal State Cooperative for Population Estimates and Projections network