May 14, 2020

Director Steven D. Dillingham
U.S. Census Bureau
4600 Silver Hill Road
Suitland, MD 20746

Dear Director Dillingham:

On behalf of the Population Association of America (PAA)
(www.populationassociation.org) and the Association of Population Centers
(APC), we are writing to reiterate our interests in the Census Bureau's
efforts to implement a new Disclosure Avoidance System (DAS) and to
urge the agency to release at least one more set of demonstration products
before finalizing the DAS.

As you know, PAA and APC are two affiliated organizations that together
represent over 3,000 population scientists who conduct research on the
individual, societal, and environmental implications of population change.
Census data are used broadly by our members, regardless of their unique
expertise, to conduct research and research training activities. As supportive
partners of the Census Bureau, we recognize that the agency has a duty to
not only collect and disseminate high-quality data, but also to protect the
confidentiality of individuals. New technologies combined with the
proliferation of publicly available databases have made the job of privacy
protection much more difficult. We appreciate that procedures the Census
Bureau enacted just 10 years ago can no longer be used to protect privacy.

The new methods being adopted in the Bureau's new DAS use the
methodology referred to as Differential Privacy (DP). This new DAS is
designed to provide a guaranteed level of protection to individuals
completing the decennial census. However, this system is new in its
application and poses risks to the utility of the data that are the mainstay of
the Census Bureau's foremost mission – to provide high quality data for the
nation.

To its credit, the Census Bureau has embarked on a cooperative effort with
the data user community through the NASEM's Committee on National
Statistics (CNSTAT) to evaluate the impact of privacy constraints on the
utility of decennial census data. The Census Bureau created and distributed
to the public, in October 2019, the **2010 Census Demonstration products**,
a version of the 2010 products to which it applied the Bureau's new DAS
that could be directly compared to the published 2010 census data that was
based on the previous DAS. Census invited public comments on these
demonstration data.

In addition, CNSTAT convened a workshop in December 2019 where data users from all over the nation gauged the utility of the special DAS demonstration file for applications that included emergency preparedness, public health outcomes, local revenue distribution, and the drawing of political districts. While the new DAS did show some promise, the general conclusion was that it failed to meet the requirements for most of the applications presented at the workshop. A synopsis of the workshop findings is available on the PAA home page.

The CNSTAT December 2019 workshop left little doubt in the minds of the data user community and the Census Bureau that the newly proposed DAS based on Differential Privacy was in serious need of improvement. As follow-up, the Census Bureau commissioned CNSTAT to convene a group of expert data users to provide input as they seek to improve the DAS, in light of the problems identified in the CNSTAT Workshop and by others in the user community.

Furthermore, the Census Bureau is developing a set of metrics or summary statistics that will be released with the 2020 Census products to measure data quality. On March 27, 2020 the Census Bureau released a draft of the metrics it proposes to use and invited public comment.
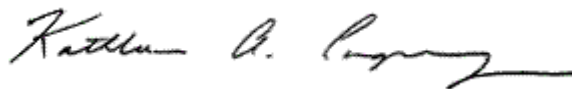
While necessary, these measures are insufficient to gauge the level of improvement or adequacy of 2020 census products subject to the new DAS for real world applications of the data. Furthermore, it is our understanding that the Census Bureau currently plans to move forward *without* offering the data user community an updated set of demonstration products, like the ones released in October 2019 with actual tabulations subject to the new (and we hope) improved DAS and to allow the user community to evaluate and provide comment.

In sum, we urge the Bureau to work collaboratively with the user communities, including the PAA, to ensure that the utility of the data produced by the updated DAS is sufficient to meet their various use cases. Thank you for considering our request for at least one more set of demonstration products and to allow users to evaluate and comment before the Bureau makes its final decisions on the DAS. We look forward to your response and to continue working with you and your team.

Sincerely,

Eileen Crimmins,
PAA President

Kathleen A. Cagney
APC President