



STATE OF WASHINGTON
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February 6, 2020

Steven Dillingham, Director
U.S. Census Bureau
4600 Silver Hill Road, Room 8H001
Washington, DC 20233

Dear Director Dillingham:

Thank you for the opportunity to review the demonstration data products. We appreciate the opportunity to provide feedback on the Disclosure Avoidance System (DAS). To provide you with the best possible feedback, we compared the results of the DAS approach against 2010 data and have reached the conclusion that the DAS as currently designed will harm Washington residents if it is applied to the 2020 Census data.

The following examples illustrate why we have reached this conclusion.

The household data in the demonstration product is unrealistic and unusable for large parts of Washington state. For example, eight counties had occupancy rates at or near 100%, which is illogical and historically implausible. This finding alone shows that DAS infused noise is readily apparent and damages the data even at higher levels of geography. The noise does not simply average out.

There is a bias in the demonstration data that causes areas with small populations to get larger while areas with larger populations get smaller. This bias has many impacts including the displacing of people from cities to the unincorporated parts of counties. The demonstration product tabulates about 19,400 more people in unincorporated areas than in the 2010 data. This can have a large impact on individual cities. For example, under the DAS the city of Ferndale would have lost 490 people or over 4% of its total population. Larger cities like the city of Kent are impacted as well. Kent would have lost 900 people or 1% of its population. These differences are consequential. They effect the city's planning and funding until the next census. As Washington distributes about \$200 million dollars each year to counties and cities on a per capita basis these differences are of great concern to us.

There is another bias in the data that makes communities with similar racial characteristics more dispersed geographically. For example, at the census tract level, the net numbers of Hispanic Asians alone, Hispanic Native Hawaiian and Other Pacific Islanders alone that were displaced by DAS are more than half the total number of persons counted in these groups in 2010.

The DAS will be particularly deleterious to our small governments. Washington is a made up of small places. Sixty-four percent of Washington's cities and unincorporated-county parts are under 10,000 people. The DAS demographic characteristics of small places are much more variant than large places and the characteristics are often unrealistic. Please review our [age by sex comparison graphics](#) for age by sex comparisons of Washington counties and cities.



Director Dillingham
February 6, 2020
Page 2 of 2

The amount of variation in the demonstration census block data is alarmingly high and extremely problematic for our work. Washington state routinely aggregates census block data to serve a variety of program management needs. We use census block data as the basis for: local voting precincts, legislative districts, congressional redistricts, community planning areas, fire protection areas, hospital districts, Islands, local health jurisdictions Public Transportation Benefit Areas, Regional Transit Areas, school districts, Traffic Analysis Zones, tribal areas, tsunami inundation zones, unincorporated portions of urban growth areas, urban areas, urban growth areas, watershed sub basins, watersheds, ZIP Codes and more. Nearly 11% of the total population is displaced by DAS at the block level making the data unreliable. When one looks at population characteristics of individual blocks the data looks worse. One extreme example of this is census block 530530725042008, the block where the Washington Correction Center for Women is located. Block 530530725042008 was 99% female in the 2010 SF1 data. In the demonstration product it is 25% female. Our male only prisons fare a little better. The blocks that contain all male prisons change from 98.2% Male to 87.5%, a change in gender of approximately 1,900 people.

It is essential that the data we receive from the 2020 Census reflect the actual populations of our communities. Age, sex, race and ethnicity are very important factors in local decision making. Differences in these characteristics will have dramatic impacts on these communities. These differences are key to providing services equitably and to preventing marginalized populations from further discrimination. It is vital that small area data be kept intact so official statistics accurately portray our communities, and we can have fairness in our decision making processes.

These preliminary investigations suggest that the DAS as currently designed has not had sufficient review and its implications have not been fully addressed. We would like you to reconsider applying the DAS to the 2020 Census data. Instead, we advocate applying the same methods of privacy protection to the 2020 data that were used in 2010. After the 2020 census data is released, engage stakeholders with a program that includes multiple iterations of DAS, providing an opportunity to provide feedback and input. This decision impacts all U.S. residents; it is essential that a variety of people have the opportunity to thoroughly review the results of the DAS before implementation.

Sincerely,



Mike Mohrman, State Demographer
Forecasting and Research

cc Marc Baldwin, Assistant Director