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Subject: Re: DOC
Attachments: Topics to discuss with Secretary Ross through 12_31 cdj.docx

Here's my thoughts, but I forgot to use track changes. I added the first sentence and moved, then edited the Presidential Memorandum paragraph.

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Topics to discuss with Secretary Ross through 12/31/2020

The Department is demonstrating an unusually, high degree of engagement in technical matters, which is unprecedented relative to the previous censuses.

1. Completion of NRFU by 9/30. If there are many states substantially below the target 99% completion rate, do we stay in the field past the 9/30 deadline? If we do, we won't be able to deliver the apportionment data to the Secretary and President by the 12/31 statutory deadline. The Census Bureau is currently engaged in extraordinary efforts to achieve the 99% target in every state by the end of September. However, this may not be achievable and a decision to end field work by schedule date or work completeness will need to be made. The Census Bureau views this as policy decision that political leadership should make.
2. Imputation. The Secretary and other political personnel have expressed interest in the Census Bureau's use of imputation in the 2020 Census. Interest was expressed in both item (filling in missing items in a self-response, direct enumeration or NRFU record) and status and count imputation (resolving cases with no response). Status and count imputation impact the CUF (Census unedited file) that underlies the 12/31 apportionment products. Item imputation impacts the CEF (census edited file) that impacts the 4/1 PL-94-171 redistricting products. The Census Bureau views imputation methodologies as its responsibility as an independent statistical agency.
3. Post-collection processing. Due to the compressed schedule, political leadership has expressed interest in ways that processing can be accelerated to meeting statutory deadlines. The Census Bureau has found efficiencies that can generate a completed CUF in time to produce resident population and foreign affiliated overseas residents for each state to meet the apportionment deadline assuming no major processing glitches are encountered. The Census Bureau views post-collection procedures as its responsibility as an independent statistical agency.
4. Disclosure Avoidance. The Secretary and other political personnel have expressed interest in the methods the Census Bureau will be using to protect privacy and confidentiality as required by law for the 2020 Census. To summarize, two important decisions have already been made by the Census Bureau's DSEP (Data Stewardship Executive Policy) Committee: i) to adopt differential privacy as the statistical disclosure avoidance methodology for the 2020 Census and ii) to leave the resident population and federally affiliated overseas counts as invariants (i.e., published as enumerated). The DSEP will soon be meeting to decide the value of the privacy parameter – epsilon – for the PL 94-171 and other data products. If state level counts of unauthorized immigrants counted in the 2020 Census are to be released, the DSEP will also need to decide if they require disclosure protection. The adoption of differential privacy has been controversial across the data user community. Essentially, there's a direct tradeoff between privacy protection and detailed and accurate statistics. Where one lands on that continuum is a choice. The only policy guidance on that choice is title 13, which calls for strict privacy protections. The Census Bureau views disclosure avoidance procedures and policies as its responsibility as an independent statistical agency. Moreover, these decisions are the purview of the DSEP and not of political leadership.
5. Production of the CEF and other downstream data products (e.g., PL 94-171, CVAP and other data products). The Secretary and other political personnel have expressed interest in the redistricting, the citizen voting age population and other data products constructed from the

2020 Census. Notably, the Census Bureau is using administrative records to produce improved (block level) CVAP data. The Census Bureau is still assessing whether it will be able to make adjustments under the compressed schedule to deliver the PL data by 4/1 as required by statute. The Census Bureau views the procedures and schedule of the release of these data products as its responsibility as an independent statistical agency.

Finally, with respect to the Presidential memo, we are also concerned by the level of direct engagement with the methodology. As we've reported throughout the past weeks, the Census Bureau's response to the 7/21 Presidential memo has been to begin developing a method to identify unauthorized residents in administrative data, some of which the Bureau obtained after EO 13880. These admin record identified unauthorized immigrants would then be matched to the 2020 Census to find those enumerated in the census. The number found in each state would be then transmitted to the Secretary and the President. This process lives downstream from the production of the CUF, the current schedule for the availability of these counts is 1/7. While the Bureau has ceased work on this due to court order and is awaiting legal and policy guidance on whether work can progress during legal proceedings, we view the development of the methodology as a technical activity and it has been our goal to deliver the most objective data possible given the constraints and the potential use of the information. In many respects, while the Presidential Memorandum may be a statement of the Administration's policy, the Census Bureau views the development of the methodology and processes as its responsibility as an independent statistical agency.