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February 3, 2020

U.S. CENSUS BUREAU
4600 Silver Hill Road
Washington, DC 20233

RE: Effect of U.S. Census Differential Privacy on the City of Alexandria, Virginia

Dear U.S. Census Bureau,

The City of Alexandria relies on Census Bureau data to provide timely and accurate information on the city's population and demographic statistics. City staff, policymakers, and community-based organizations (CBOs) use these data to assess the efficacy of existing public policies and services, and to evaluate the expected impact of new policy decisions on our residents. We are concerned that the proposed differential privacy methodology would limit our understanding of the city's population, and inhibit our ability to serve our residents equitably.

The City uses Decennial Census data to calculate annual population estimates. During intercensal years, the City estimates the population at the block level based on average household size and occupancy rates from the most recent Decennial Census, and the current number of housing units as identified in the City's geodatabase system. In blocks where a significant number of units are added between Censuses, any discrepancy between the true block-level statistics and those to which differential privacy protections have been applied will be amplified. Similarly, the City uses Decennial Census data to forecast population estimates based on our best assumptions about how the City's built environment will develop in the future. These estimates are used to inform public service and policy decisions that will last for decades. For example, the estimates feed into the Metropolitan Washington Council of Governments' (MWCOC) long-range transportation plan, [Visualize 2045](#).

If our population estimates and projections are inaccurate, the City and CBOs risk providing inadequate levels of service to our residents if the true number of residents in a sub-jurisdictional geography is greater than the estimated number based on Census data. For example, the City is currently developing a new public transit routing plan using current Census data and City population forecasts. If Census data do not reflect reality, the system could unintentionally be designed to overserve some communities and underserve others.

We would also not be able to use Census data to reliably identify where communities of residents belonging to specific racial, ethnic, or age groups are located within the City. These data are necessary for City and CBO services that serve a specific subpopulation, such as early childhood education services. City staff also use these data to assess whether they are serving all racial, ethnic, and age groups equitably. Applying differential privacy protections to these variables could mask demographic characteristics of sub-jurisdictional geographies and alter the conclusions of these analyses.

The City of Alexandria appreciates and values the Census Bureau's dedication to protecting individual privacy in response to growing data science and artificial intelligence capabilities. At the same time, accurate block-level data are critically important to the City's understanding of the current population and ability to anticipate future population growth.

To prevent inaccuracies in annual and forecasted population estimates, we recommend that the Census Bureau permit authorized City staff to access 2020 Census results before the application of differential privacy. Staff would be subject to a strict non-disclosure agreement, as well as Title 13 protections. Authorized staff would adhere to Census Bureau guidance when summarizing population estimates and forecasts to protect individual privacy.

To best avoid inequitable allocation of services, we recommend that the Census Bureau provide clear guidance on how to interpret publicly accessible 2020 Census data that is understood by a non-technical audience. The guidance should focus particularly on sub-jurisdictional geographies, since many services are provided at the neighborhood-level. This would allow City staff and CBOs to continue to use Census data to determine whether services are being provided equitably and whether they are reaching their target populations.

Lastly, we recommend that the Census Bureau provide margins of error for publicly available 2020 Census data. Margins of error will make it easier to establish confidence intervals around population figures provided by the Census Bureau, which would reduce the uncertainty associated with differential privacy protections. Guidance on interpreting 2020 Census data should reference how to use and understand margins of error for non-technical audiences. Please contact Sierra Latham (703.746.3832 or sierra.latham@alexandriava.gov), City of Alexandria Demographer, with any questions.

Sincerely,



Mark B. Jinks
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