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May 14, 2021

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

Dear Dr. Jarmin,

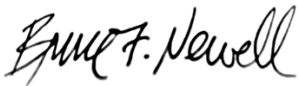
The Montana State Library Commission, and on behalf of the Montana Land Information Advisory Council and the Network Advisory Council of Libraries, write to you to express our serious concerns regarding the U.S. Census Bureau's use of differential privacy statistical methods on the 2020 Decennial Census. The Montana State Library and libraries around the state worked diligently for more than four years to ensure a complete count in Montana because we know that conducting the decennial census, and delivering quality data products, are essential to the productivity and well-being of our state. The data are critical to funding allocations, economic planning and development decisions, and state governance.

The Bureau's decision to apply differential privacy, as proposed, undermines the Census's ability to ensure that states and citizens receive accurate information. We draw this conclusion in part from the Montana's Census and Economic Information Center and other states' analysis. The variations in population found in the demonstration datasets, based on the 2010 Census, provided to the states, are concerning.

If population and household census data is released in a form that is known to not represent the actual number of people enumerated, the data will result in numerous issues of serious concern that will negatively impact state programs and our ability to carry out our statutory responsibilities. First, there will be a misallocation of federal funding that is distributed based on population. States will find themselves in the same situation when distributing state funding and services based on population and in turn, this will affect local government funding and services. Specifically, decisions made by the U.S. Census will directly determine the allocation of state funding for Montana's public libraries and our ability to accurately assess the impact of library services for Montanans. As the State Library Commission, we have legal standing and an obligation to avert inequitable distribution of these funds. Based on current projections, Montana tribes and small communities will be adversely affected and we will be unable to confidently distribute funds fairly and in accordance with Montana law. Data must be accurate to ensure the fair distribution of funds and the authoritativeness of our evaluation information. Finally, without the use of accurate population information, problems will arise for states during the reapportionment process resulting in legislative districts that do not reflect reality in the demographic makeup of statistical geographies and households.

U.S. Census has always set the standard for the most reliable population and demographic data. We are concerned these newly applied differential privacy statistical methods will create an unintended distrust of information and cause users to seek it elsewhere from less reliable and unauthoritative sources. As information professionals tasked with providing authoritative, trusted information, we hope that the Census shares our concerns and will make every effort to resolve this matter.

Sincerely,

A handwritten signature in black ink that reads "Bruce F. Newell". The signature is written in a cursive style with a large initial "B" and "N".

Bruce Newell, Chair  
Montana State Library Commission

Cc: Jennie Stapp, Montana State Librarian  
Erin Fashoway, State GIS Coordinator  
Senator John Tester  
Senator Steve Daines  
Representative Matt Rosendale