



STATE OF CONNECTICUT
OFFICE OF POLICY AND MANAGEMENT
OFFICE OF THE SECRETARY

January 28, 2020

Michael Ratcliffe
Asst. Division Chief, Geographic Standards, Criteria, Research, and Quality
Geography Division
U.S. Census Bureau
4600 Silver Hill Road
Washington, DC 20233

Dear Mr. Ratcliffe:

Thank you for providing the State of Connecticut, Office of Policy and Management (CT-OPM), with an opportunity to review and comment on the draft Federal Register notice that you circulated on November 22, 2019. During this review period, CT-OPM has sought input on the draft notice from the CT Census State Data Center, the regional councils of governments (COGs), and the state's Executive Branch agencies that participate in the state's open data efforts.

As the new Chief Data Officer for the State of Connecticut, I wanted to make sure that these organizations were fully aware of the proposed change and that they were given a reasonable opportunity to comment. I have attached a copy of the draft Federal Register notice with some suggested edits for your consideration.

In addition, I polled each state agency data officer on the following questions, in order to assess the potential impact of the proposed change on them and their agency:

- Do you use Census county-level data now? How? Is it used for reporting and compliance, for analysis, for research?
- What potential impact would there be for your agency in changing the Census reporting from counties to the planning regions?
- Do you foresee any risks or benefits to the change that may not already have been considered?

While most of those polled indicated that they do not anticipate the proposed change will have any significant impact on their respective agency's plans and operations, a few responders did raise the following questions:

- 1) The state Department of Public Health (CT-DPH) reports data by county to the CDC-National Center for Health Statistics. How is reporting handled in other states that have county equivalent entities?
- 2) Several agencies rely on trend data for analysis. How would agencies that use trend data manage changes to legacy systems? How long would the Census maintain counties and planning regions in parallel? For example, surveillance on reportable diseases relies on the ability to look at historical data and trends and could require re-coding historical data.
- 3) A few agencies provide county data for users on a voluntary basis. These agencies raised similar questions about managing the transition for these datasets: How long would county-level data be maintained in parallel? How would trend analysis be supported? Would historical Census data be re-coded to planning regions?
- 4) Would there be changes in data collection for the 2020 Census? CT-DPH uses the decennial Census data as the baseline for population estimates. If county-equivalents are not reflected in the 2020 Census data collection, how would that data be used for estimates in later years?
- 5) How would the change to county-equivalents impact eligibility for federal funding and federal funding formula allocations (such as for [CDBG](#) or [HOPWA](#))?

I would appreciate the opportunity to discuss your thoughts and perspective on these questions at a mutually convenient time, as this will help me to keep an open line of communication with our state's Census data users.

Finally, I understand that the issue of differential privacy is an independent action being taken by the Census Bureau to provide a more open and transparent system for producing and publishing official statistics. I intend to work with the CT Census State Data Center to schedule training and outreach on differential privacy in the future, as more guidance is provided by the Census Bureau.

Sincerely,

Scott Gaul
Chief Data Officer

Attachment: Draft Federal Register Notice with CT-OPM suggested edits

Cc: Melissa McCaw, CT-OPM
Martin Heft, CT-OPM
Dan Morley, CT-OPM
Michelle Riordan-Nold, CT Census State Data Center
CT Councils of Governments