

# Supporting Document A Policy Review Checklist

*Version 1.2*

Effective: 01 Mar 04

*Census Bureau Standard  
Review and Approval of Census Bureau Documents and Presentations*

Authored by:

Cynthia Z.F. Clark  
Associate Director  
for Methodology and Standards

USCENSUSBUREAU

*Helping You Make Informed Decisions*



## Document Management & Control

Version	Issue Date	Approval	Description
1.0	09 Aug 02	Associate Directors	Initial Release
1.1	01 Mar 04	Associate Directors	Reissue
1.2	29 Dec 04	Configuration Mgr.	Reformatted to comply with Census Bureau Identity Standard and Quality Program Document Management Plan

**The most current version of this document is maintained on the Census Bureau Intranet and may be accessed from the Methodology & Standards Council Intranet Web Site.**

## Policy Review Checklist

The Policy Office is responsible for reviewing a wide range of external communications *from the policy perspective*. The reviews especially focus on sensitive issues and ensure that statements represent current policy. The Policy Office is primarily responsible for reviewing material for the signature of the Deputy Director or above. Policy review for other material is first the responsibility of the divisions and the associate directors. Questions on policy issues may be referred to the Policy Office. Reviews include correspondence, interagency agreements, reimbursable agreements, memoranda of understanding, brochures, advance letters for surveys, responses to oversight and congressional inquiries, and Office of Management and Budget clearance packages, among others.

The policy review looks at each document with the following issues in mind:

1. **The Census Bureau's Position** – Ensures that statements made reflect the current policy and position of the Census Bureau. In particular, the reviewer checks to see that statements in the document are consistent with the Census Bureau's policies and procedures.
2. **Sensitive Issues** – Ensures that any comments related to currently sensitive issues are reviewed. These issues evolve over time. Current issues include:
  - Census Adjustment or the Accuracy and Coverage Evaluation survey;
  - Congressional Budget Office access to Title 13 data;
  - Any issue under a Freedom of Information Act request;
  - Part of a lawsuit;
  - Issues that Congressional and other Oversight committees are addressing, e.g., counting overseas Americans;
  - Secretarial correspondence;
  - Any issue related to privacy or confidentiality; and
  - Other topics as identified by the Policy Office.
3. **Consistency** – Checks to see that the document's response to an issue is consistent with comparable responses to similar correspondence. In other words, letters about the same issue should receive essentially the same response, unless the overall response has changed.
4. **Exaggeration or Overstatement** – Examines the document to be sure that it does not overstate or exaggerate in making statements about the Census Bureau's programs or products. For instance, census data may be useful in making decisions about where to locate a new business, but census data alone will not justify a loan for a new building.
5. **Inappropriate Statements** – Reviews the document to ensure that it does not offend people of any particular age, sex, race, religion, ethnic group, or nationality. Furthermore, it checks

the tone of the document to be sure that it is polite and informative – not harassing or offensive to the reader.

- 6. Confidentiality Statements** – Examines the Title 13 confidentiality statement to ensure it is correct. Confidentiality statements for Census Bureau censuses and surveys should state that *Title 13, United States Code, Section 9 provides for confidentiality of the respondent's information, requires that only persons sworn to protect the confidentiality of Census Bureau information may see your answers, and that the information collected will be used for statistical purposes only.*

**Note:** The standard confidentiality statement differs by program. Each new statement should be cleared with the Policy Office before implementing it. Examples of confidentiality statements are:

*All the information the Census Bureau collects for this survey about you and your household is confidential by law (Title 13, United States Code, Section 9). By law every Census Bureau employee – including the Director and every field representative – has taken an oath and is subject to a jail term, a fine, or both, if he or she discloses ANY information that could identify you or your household. The information will be used only for statistical purposes.* (DSD)

*Your response is required by law. Title 13, United States Code, requires businesses and other organizations that receive this questionnaire to answer the questions and return the report to the U.S. Census Bureau. By the same law, your report is confidential. It may be seen only by persons sworn to uphold the confidentiality of Census Bureau information and may be used only for statistical purposes. Further, copies retained in respondent's files are immune from legal process.* (Economic Directorate)

- 7. Title 13/Title 15 – Verifies that Title 15 surveys do not make statements that imply that Title 13 protections will be provided to the data collected. In particular:**

The Census Bureau confidentiality statement is a *must* for all Title 13 surveys; it does **not** apply to Title 15 surveys and should not be used for them.

When stating the legal authority for Title 15 surveys, be sure to note the sponsor's authority for acquiring the data from the respondents, the sponsor's and the Census Bureau's obligation to protect the data, and the Census Bureau's role as the data collector under Title 15, United States Code.