

*Version 1.3*

# Disclosure Review

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*Census Bureau Standard*

Authored by:

Laura Zayatz  
Chair, Disclosure Review Board  
Statistical Research Division

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## Document Management & Control

Version	Issue Date	Approval	Description
1.0	12 Mar 04	Associate Directors	Initial Release
1.1	14 Jan 05	Configuration Mgr.	Reformatted to comply with Census Bureau Identity Standard and Quality Program Document Management Plan
1.2	09 Mar 06	Configuration Mgr.	Inserted hyperlink for supporting document.
1.3	22 May 07	Configuration Mgr.	Update hyperlinks

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

# Census Bureau Standard: Disclosure Review

## Introduction

The Census Bureau Quality Standards are survey or statistical methodology procedures for all of the U.S. Census Bureau program areas. Title 13 of the United States Code (U.S.C.) mandates that the Census Bureau protect the confidentiality of responses to censuses and surveys, and of individual data on other record files that the Census Bureau receives. The Census Bureau Standard for Disclosure Review (the Standard) describes the procedures that the Census Bureau applies to all data products that the Census Bureau publicly releases to protect confidentiality. The Standard will aid the Disclosure Review Board (DRB) in ensuring that the disclosure avoidance procedures of the Census Bureau are always applied.

The attached *Checklist on Disclosure Potential of Data* supplements the Standard and will assist the DRB in deciding which data products may be released and which products must be revised in some way prior to their release in order to meet confidentiality requirements. It is designed to pull together complete information on the data product and disclosure avoidance procedures used to protect the data. It covers microdata, demographic frequency count data, and establishment magnitude data.

## Scope

Except as noted in footnote 1, all data collected or maintained by the Census Bureau under Title 13, U.S.C., need disclosure protection. This includes Title 13 information commingled with or enhanced by information from other sources. Commingled files link Census Bureau data with information from another survey, from administrative records, or from other sources. For example, the Census Bureau uses federal tax information in lieu of direct data collection for some single employer establishments and appends demographic information from the Social Security Administration's Numident File of applications for social security numbers to data collected for minority-owned businesses and to some of its other survey records. In addition to Census Bureau disclosure avoidance requirements, some commingled information may be subject to disclosure protections from the source agency as well.

## Standard

- 1. Disclosure Avoidance Techniques.** The Census Bureau uses a number of different disclosure avoidance techniques to protect Title 13 data – rounding, top-coding, data swapping, thresholds, random noise, cell suppression and complementary cell suppression, to name a few.<sup>1</sup> Methods differ depending on whether the release is for

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<sup>1</sup>See also *Federal Register* notice, vol. 68, no. 86, pp. 23693-23694.

tabular data, public-use microdata, or statistical model output. For basic information on these techniques, see *Statistical Policy Working Paper 22: Report on Statistical Disclosure Limitation Methodology*, published by the Office of Management and Budget's Federal Committee on Statistical Methodology – this report is available at: [http://www.fcsm.gov/working-papers/SPWP22\\_rev.pdf](http://www.fcsm.gov/working-papers/SPWP22_rev.pdf).

For specific information on current Census Bureau disclosure avoidance practices or assistance in developing appropriate disclosure avoidance techniques for a specific type of release, consult the Statistical Disclosure Avoidance staff in the Statistical Research Division.

2. **The Checklist.** The *Checklist for Disclosure Potential of Data* is a general list of questions developed by the DRB to elicit responses from the data producers that help the DRB learn about the data set and identify potential disclosure issues. The data producers are required to provide what disclosure avoidance methodologies (if any) have been used to protect the data from disclosure; what other similar data have already been released (by the Census Bureau or other sources) that could be used to identify individuals or establishments; and, if data from the same survey were approved for release last year, how does the new release differ. Questions like these help the DRB determine what additional measures may be needed (if any) to ensure protection of individual respondents' answers.

In general, this form must be completed for all types of data releases (e.g., demographic and economic microdata, demographic and economic tabular data, audio tapes, etc.). The standard does take account of those situations where it is reasonable to reduce the reporting burden. The checklist is unnecessary in the cases described below. However, the data will still be reviewed in order to take into account any change in the public availability of information that could be used for reidentification. For economic backcasting, one memo and checklist are required for approval of the disclosure avoidance techniques to be used to protect the data.

The memorandum to the Chair of the DRB needs to be prepared, but the Checklist does not have to be completed for the following cases:

- Repetitive survey where no changes have occurred in geographic information, in data items published, or in disclosure avoidance procedures since the previous data release;
- Cross tabulations from demographic surveys that do not identify geographic areas with fewer than 100,000 people in the area from which the sample was chosen;
- Output from the *American FactFinder* (AFF) Advanced Query System that passes the confidentiality filters; or

- Decennial census special tabulations and Research Data Center data products because they have their own separate set of disclosure avoidance requirements and procedures.

Neither the memorandum nor the Checklist has to be completed in the following cases:

- Monthly and quarterly economic releases and economic revisions.

3. **Obtaining DRB Approval.** The project manager should write a formal memorandum to the Chair, DRB, requesting clearance for the release of the data. The memorandum should contain detailed information about the data set, including a completed copy of the *Checklist for Disclosure Potential of Data*, and any other information that will help the DRB determine what the disclosure issues are for the data set. Examples of additional information include frequency tables for identifying sparse variables, record layouts, and, in the case of new data collections, the questionnaire and data collection procedures.

The DRB generally meets weekly to discuss pending requests. A quorum of DRB members is needed to approve a release. On average, the project manager should submit the formal request for clearance one to two months before planned release. That time permits the DRB to address other pending requests, review the material submitted by the project manager, and request and review additional output (if needed). As a result of DRB discussions, the project manager may be asked to make changes to the final data set before release – e.g., collapsing some sparse cells or releasing data at a higher level of geography. Once a DRB decision is made, the Chair, DRB, will send a formal memorandum to the project manager, providing the recommendations of the Board.

Data producers and/or project managers are encouraged to informally contact the Chair, DRB, early in the data production schedule, to identify any significant disclosure issues presented by the proposed data set. Such interactions can save resources and expedite the release of the data. It is important to remember, however, that advance contacts with the Chair or the full DRB do not represent clearance by the DRB.

In the formal DRB approval memorandum, approval is usually provided unconditionally, with no other clearances needed, aside from any required by the division, office, and directorate. Sometimes conditional approval is provided, contingent upon some specific change to the data set. Then the data must be changed, as requested, prior to release. Other times, when administrative records are involved, conditional approval may be provided, pending any further clearances required by the source agency.

In most cases, when the DRB has concerns about the release of a data set, it will work with the project manager and data producers to address those concerns. If the DRB still denies a request to release a data set, and the project manager disagrees, the reasons why there are no disclosure issues present in the data to be released must be documented and submitted in an appeal to the DRB. If there is still no resolution, then the case is

appealed to the Data Stewardship Executive Policy Committee for a final decision. These further steps are rarely needed.

Use the following information to contact the Disclosure Review Board:  
Laura Zayatz, Chair, Disclosure Review Board  
Statistical Research Division  
[laura.zayatz@census.gov](mailto:laura.zayatz@census.gov)

## Responsibilities

### Program areas will be responsible for the following:

- applying appropriate disclosure avoidance techniques to any data intended for public release;
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- using the Standard Checklist as applicable; and
- documenting its use.

### The DRB will be responsible for the following:

- assisting in identifying appropriate disclosure avoidance methods;
- providing timely feedback on materials sent to the DRB for disclosure review;
- applying disclosure review criteria in a consistent manner;
- formally informing program areas of DRB decisions and maintaining copies of all decision documentation; and
- maintaining a database that contains a compilation of prior decisions.

### The Methodology and Standards Council will be responsible for the following:

- the initiation of periodic evaluations, reviews, and updates to the standards, as necessary; and
- guidance to program areas in the development and usage of the standards.

## Implementation

Implementation starts immediately.

## **Inquiries**

Inquiries relating to the interpretation of this standard should be addressed to the Census Bureau Methodology and Standards Council.

### *Supporting Document:*

Checklist on Disclosure Potential of Data

**Recommended by Census Bureau Methodology and Standards Council:**

*Signed Cynthia Z.F. Clark, March 12, 2004*

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Cynthia Z.F. Clark  
Chair, Census Bureau Methodology and Standards Council  
Associate Director for Methodology and Standards

*Signed Robert N. Tinari, March 12, 2004*

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Robert N. Tinari  
Chief, Computer Assisted Survey Research Office

*Signed Rajendra P. Singh, March 12, 2004*

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Rajendra P. Singh  
Chief, Decennial Statistical Studies Division

*Signed Alan R. Tupek, March 12, 2004*

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Alan R. Tupek  
Chief, Demographic Statistical Methods Division

*Signed Howard Hogan, March 12, 2004*

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Howard Hogan  
Chief, Economic Statistical Methods and Programming Division

*Signed Ruth Ann Killion, March 12, 2004*

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Ruth Ann Killion  
Chief, Planning, Research, and Evaluation Division

*Signed Tommy Wright, March 12, 2004*

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Tommy Wright  
Chief, Statistical Research Division



**Concurrence:**

*Signed Preston Jay Waite, March 12, 2004*

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Preston Jay Waite  
Associate Director for Decennial Programs

*Signed Nancy M. Gordon, March 12, 2004*

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Nancy M. Gordon  
Associate Director for Demographic Programs

*Signed Frederick T. Knickerbocker, March 12, 2004*

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Frederick T. Knickerbocker  
Associate Director for Economic Programs

*Signed Marvin D. Raines, March 12, 2004*

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Marvin D. Raines  
Associate Director for Field Operations

*Signed Lawrence A. Neal, March 12, 2004*

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Lawrence A. Neal  
Associate Director for Communications

*Signed Gloria Gutierrez, March 12, 2004*

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Gloria Gutierrez  
Assistant Director for Marketing and Customer Liaison

*Signed Gerald W. Gates, March 12, 2004*

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Gerald W. Gates  
Chief, Policy Office

*Signed Cynthia Z.F. Clark, March 12, 2004*

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