

Review and Approval of Census Bureau Documents and Presentations

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Census Bureau Standard

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| 1.5 | 14 Mar 07 | M&S Council | Revised disclaimer text, updated hyperlinks for "Relation to Other Review Processes", deleted hyperlinks for supporting documents, and revised footnote 1 for the location of the controlled document. |
| 1.6 | 22 Mar 07 | Quality Prog. Mgr. | Corrected typographical error. |
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| 1.9 | 20 May 08 | Quality Prog. Mgr. | Revise URL for presentation templates |
| 1.10 | 21 Jan 09 | Quality Prog. Mgr. | Updated hyperlinks. Removed references to PRED and CASRO. |

¹ The 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: Review and Approval of Census Bureau Documents and Presentations

Introduction

The Census Bureau Quality Standards are primarily survey or statistical methodology procedures for all U.S. Census Bureau program areas. The Census Bureau Standard for Review and Approval of Census Bureau Documents and Presentations (the Standard) applies to all papers and electronic documents of a professional nature that will be released to the public, as well as such documents put on list servers prepared by Census Bureau employees. It includes work done by the Census Bureau staff for its programs and for other organizations under contract, as well as work that is done for the Census Bureau under contract.** The purpose of the Standard is to ensure that all reports, abstracts, discussant comments, papers, articles, and presentations prepared by Census Bureau staff in all directorates are of high quality, having undergone not only statistical and methodological reviews but also supervisory, content/subject-matter, and policy/procedure reviews. The review process will assist Census Bureau staff members in presenting their work in a manner that brings credit to and enhances the Census Bureau's reputation.

The Census Bureau enjoys a hard-earned reputation for professionalism, neutrality, and competence. Indeed, internal and external customers, data users, data providers, and the general public, expect – and they clearly have the right to expect – excellence in the quality of the products and services we provide. Every product and public contact creates and leaves an impression of the Census Bureau as an institution. The responsibility for maintaining the Census Bureau's reputation and delivering products and services of high quality rests with each and every staff member.

Scope

The Standard applies to the following documents (and revisions of these documents) prepared by Census Bureau staff: news releases; standard Census Bureau publications; Census Bureau technical reports; division report series; abstracts; discussant comments; and papers for conferences or seminars (e.g., Joint Statistical Meetings, Population Association of America, American Economics Association, American Association for Public Opinion Research, Federal Committee on Statistical Methodology, international statistical conferences, and Economic Commission of European Workshops); peer-reviewed journal articles and book chapters; OMB survey clearance requests; and budget-related documents prepared for the Department of Commerce, Office of Management and Budget (OMB), or Congress. This standard applies as

** For clarification on how this standard applies to work essentially done for academic purposes, see **Academic Investigators** under Section I of this standard.

well to all first-time presentations at formal meetings and conferences open to the public made by Census Bureau staff on their work or on Census Bureau programs. It is the responsibility of each associate director or division chief to ensure that the content and quality of other documents and presentations, such as internal newsletters or handouts, which may not be explicitly covered by this standard are in conformance with the criteria for review and approval set forth in this standard.

Relation to Other Review Processes

Two chapters of the Census Bureau Policies and Procedures Manual and a Department of Commerce Order are relevant to this standard:

- Chapter B-6 – “Correspondence Management Staff and the Correspondence Guidelines” - <http://cww2.census.gov/amsd/services/ppm/docs/b6.htm> (Requires access to the Census Bureau’s Intranet)
- Chapter B-13 – “Clearance and Release of Public Information Materials” - <http://cww2.census.gov/amsd/services/ppm/docs/b13ppm.htm> (Requires access to the Census Bureau’s Intranet) and
- Department of Commerce Order – “Outside Writing and Speaking: Departmental Approval” (DAO 219-1) – <http://dms.osec.doc.gov/cgi-bin/doi.cgi?204:112:1be1ea3913b3121cc0fc206b2d9f8b79e4531a45b8e72ce034ee3a8ec821b5ac:297>

This standard does not replace requirements outlined in these three documents, but provides a review and approval process for the documents that may fall within the scope of Chapter B-6, Chapter B-13 or DAO 219-1.

Chapter B-6 sets forth the policy regarding the preparation of correspondence for the Director and Deputy Director of the Census Bureau, and the Secretary, Deputy Secretary, and Under/Assistant Secretaries of the Department of Commerce. The Correspondence Quality Assurance Staff is responsible for controlling and processing all incoming and outgoing correspondence directed to or signed by the officials mentioned above. Such correspondence includes: Congressional letters, White House referrals, Department of Commerce referrals, Secretarial responses, Certifications, Federal Register Notices, Memoranda of Understanding, Memoranda of Agreement, and survey and census form letters. The objectives of the review and approval process are to ensure quality correspondence and the coordination and timely dissemination of information in compliance with the Department of Commerce and Census Bureau policies, practices, procedures, and stylistic preferences.

Chapter B-13 sets forth procedures for clearing speeches, publications, news releases, certain news media contracts, and other informational programs. The Census Bureau’s Public Information Office oversees this clearance process. Those individuals approving documents

under the “Clearance and Release of Public Information Materials” indicate their concurrence with the message of the document.

DAO 219-1 establishes the policy to guide Department of Commerce officers and employees in performing public communications activities such as writing for outside publication, making public addresses, lecturing, participating in group discussions, appearing on radio or TV, or making sound recordings or other audio-visual or graphic works.

Standard

The Standard consists of five main processes that authors, managers, and executives must use to ensure quality in reports and documents authored by Census Bureau staff and in presentations made by staff. These processes are:

1. Review and Approval of Documents and Discussant Comments;
2. Review and Approval of Presentations;
3. Coordination of Conferences, Meetings, and Other Forums for Paper Presentations;
4. Clearance of Documents; and
5. Clearance for Participation in Public Events.

All documents and presentations should additionally follow the Census Bureau’s ‘look and feel’ standards found on the Census Bureau’s Intranet website at - <http://idstd.acsd.census.gov/>.

1. Review of Documents and Discussant Comments. Each product has the potential for undergoing four types of review and approval procedures: supervisory, content/subject matter, statistical and methodological, and policies/procedures (refer to Table 1). These reviews and approvals are expected to be thorough and accurate, yet appropriate, in extent and scope to the type of document. They are also expected to be conducted in a timely manner, meeting publication and presentation schedules. The reviews and approvals should ensure that the content is correct and that appropriate statistical methods were used and used correctly. Since the Census Bureau is purely a professional organization responsible for key economic and social indicators, under no circumstances may views be expressed in documents or presentations on any current, or proposed public policies. However, consistent with the Census Bureau’s statistical mission, methodological, operational, or technical views may be discussed. In addition, the review and approval process must ensure that the document does not disclose any Title 13 data. If the document uses administrative data, such as federal tax data, the Administrative Records Tracking System should be checked to determine whether disclosure review by the source agency is required. Data presented must meet established Disclosure Review Board criteria for public release.

All documents and written discussant comments are to be reviewed and approved by the author’s first line supervisor and by one individual from a branch other than the author’s. If a document is prepared under contract for a Census Bureau program, then the review and approval process should be included in the contract’s statement of work. If the author is a

division chief, then the reviewing and approval official is the author's associate director. Authors are to provide reviewers with new versions of the document after their comments are incorporated for the reviewer's approval. If there are substantive comments that the author does not address in the new version, then the author is responsible for providing, in writing, the reason these comments were not incorporated and for discussing them with the reviewer. If the reviewer is not satisfied with the manner in which the comments have been addressed, then the reviewer must inform the reviewer's division chief that there is an unresolved issue. It is, however, the author's responsibility to document the disagreement and provide information to the reviewer, the reviewer's division chief, and the author's division chief, if different, so that a resolution can be reached.

It is the responsibility of the author's division chief to ensure that all Census Bureau products originating from that division are of the highest quality, error free, and in compliance with current Census Bureau policy. The author's associate director is ultimately accountable for the accuracy and quality of information in all documents that are approved for dissemination within their directorate.

Supervisory Review and Approval. All documents require a supervisory review and approval. The supervisory reviewer is the author's immediate supervisor and any other designated supervisory reviewers. It is the responsibility of the author's immediate supervisor to ensure that the content of the document is technically correct, expresses no direct or implied policy views, uses correct grammar, and incorporates stylistic and writing guidelines appropriate for the intended audience.

Content/Subject-Matter Review and Approval. All documents covered by this standard require a content/subject-matter review and approval. Content/subject-matter reviewers are those with expertise in the subject matter, operation, or statistical program discussed in the document. These reviewers should consider the following during the review and approval process:

- Subject-matter literature is referenced in the document as appropriate;
- Information is factually correct; and
- Information is presented logically, conclusions follow from the analysis, no anomalous findings are ignored, and personal views are either deleted or, if appropriate for inclusion in the document because they are on methodological, technical or operational issues, are noted as such and the appropriate disclaimer used.

Statistical and Methodological Review and Approval. All documents covered by this standard require a statistical and methodological review and approval as specified in Table 1. Statistical and methodological reviewers with expertise in the methodology described in the document will conduct a peer review. These reviewers are responsible for either approving

the document or for providing the author with specific written instructions on areas to be revised. Areas they are to cover include:

- Assumptions and limitations for accuracy and appropriateness;
- Reliability of the data and statistical testing to ensure that direct and implied comparisons made are valid;
- Calculations and formulas for accuracy and statistical soundness; and
- Content, conclusions, and any recommendations on technical, statistical, or operational issues, to ensure that they are supported by the methodology used and the data being presented.

Reviewers are also responsible for ensuring that:

- Source and reliability statements are included in the paper or referenced;
- Statistical uncertainty is appropriately conveyed; and
- Comparison statements, such as historical comparisons, are appropriate.

Policies and Procedures Review and Approval. A document covered by this standard needs a policies and procedures review and approval if the answer to any of the questions below is “yes.” These reviews and approvals are to be conducted by the author’s division chief and may not be delegated. If issues arise, they are to be directed to the associate director; the associate director may refer issues to the Policy Office, Congressional Affairs Office, Public Information Office, or senior management as appropriate. Guidance for the review and approval process is provided in the checklist (Supporting Document A).

- Does the document cite laws (outside of routine references to Title 13/Title 15), regulations (or future *Federal Register* notices), court cases, congressional testimony or other policy statements/decisions, such as the Census Bureau’s *Procedure and Policy Manual* chapters?
- Does the document discuss pending congressional legislation?
- Does the document discuss issues relating to privacy, confidentiality, data security, or access and use of administrative records? Will its release affect these issues?
- Does the document raise perceptions that the Census Bureau is cooperating in any way with an enforcement, regulatory, or administrative activity of another government agency?

- Is the document historical in nature, e.g., does it focus on presenting a historical discussion of Census Bureau programs? Does it deal with sensitive historical issues like the Japanese internment or sampling in the decennial census?
- Does the document discuss the Freedom of Information Act or the Privacy Act?
- Does the document discuss any issue that is politically sensitive or that has otherwise been the subject of recent news articles, correspondence, hearings, current or potential lawsuits or the like (e.g., current poverty estimates, concerns about the census long form, or adjustment of decennial census counts)?
- Does the document single out a particular group or class of individuals to receive special treatment, consideration, or recognition, e.g., identifying key partners who contributed to the decennial census effort?

Disclaimer. Documents covered by this standard that are not official products, such as those prepared for division report series, conference proceedings, or peer-reviewed journals or book chapters, should contain the disclaimer below at the bottom of the title page. The parenthetical words should be included as appropriate for the document. Additional information may be included in the disclaimer as appropriate for the publication.

This report is released to inform interested parties of (ongoing) research and to encourage discussion (of work in progress). Any views expressed on (statistical, methodological, technical, or operational) issues are those of the author(s) and not necessarily those of the U.S. Census Bureau.

When the disclaimer is not thought to be appropriate for a particular document, the situation should be referred to the Chair of the Methodology and Standards Council.

Academic Investigators. Documents covered by this standard do not extend to independent research projects and reports carried out by academic researchers so long as:

- The reports are absent of any indication that they carry the Census Bureau imprimatur;
- The report was not requested by the Census Bureau; and
- None of the authors is a Census Bureau employee.

Academic investigators are independent researchers whose primary affiliation is with an academic or quasi-academic institution. They may be associated with the Census Bureau through a contract, an Intergovernmental Personnel Agreement, an ASA/NSF Fellowship, Special Sworn Status, or other non-employment relationship.

The exemption from this standard does not change the requirement to have the research projects approved by the Census Bureau prior to commencing work at the Census Bureau, nor does it change the requirement to undergo Census Bureau disclosure review prior to publication.

- 2. Review and Approval of Presentations and Discussant Comments.** The Census Bureau requires a review of all first-time presentations and discussant remarks made by Census Bureau staff at formal meetings and conferences open to the public (including advisory and data user meetings). All such presentations must have a dry run. The presenter's division chief is responsible for ensuring that a dry run is scheduled for the presenter with senior division management. If the presentation has statistical or methodological content, a Research and Methods Assistant Division Chief must be invited to attend the dry run. The dry run is intended to ensure appropriate context for the presentation and to assist the presenter in preparing answers for the questions that the discussant or audience may ask. Since a dry run of a discussant's or panelist's remarks is not usually possible prior to a scheduled meeting, the Associate Director may review with the individual his/her approach to the discussion and approve the individual's presentation based on that discussion and the individual's expertise. The presenters should bring copies of their presentation to the dry run. Standard Census Bureau presentation templates have been designed and are available on the Customer Liaison and Marketing Services Office (CLMSO) website – <http://cww2.census.gov/clmso/>. Staff members from the Communications Directorate are available to critique presentations.

Table 1. Review of Documents

| Type of document | Type of Review * | | |
|---|---|--|--|
| | Content/ Subject Matter | Statistical and Methodological | Policy |
| <ul style="list-style-type: none"> • News Releases | Both the associate director for the program and for communications needs to approve | Research and Methods Assistant Division Chief ** | Division Chief, Associate Director, or Policy Office |
| <ul style="list-style-type: none"> • Standard Census Bureau Publications and other Data and Report Releases • Census Bureau Technical Reports • Budget-related Documents Prepared for the Department | Review level at the discretion of the Associate Director | Research and Methods Assistant Division Chief ** | Division Chief, Associate Director, or Policy Office |

| Type of document | Type of Review * | | |
|---|---|--|--|
| | Content/ Subject Matter | Statistical and Methodological | Policy |
| <ul style="list-style-type: none"> • Division Report Series (e.g., Census Evaluation Reports, SRD Research Reports, DSSD Memo Report Series) • OMB Survey Clearance Request • Peer-Reviewed Journal article/book chapter | Review level at the discretion of the Division Chief | Research and Methods Assistant Division Chief ** | Division Chief, Associate Director, or Policy Office |
| <ul style="list-style-type: none"> • Paper or Discussant Comments for Conference or Seminar | Review from outside the author's operating unit or review at the discretion of the Division Chief | Review coordinated according to Table 2 | Division Chief, Associate Director, or Policy Office |
| <ul style="list-style-type: none"> • Abstract | Review level at the discretion of the Division Chief | Research and Methods Assistant Division Chief ** | Associate Director or designee |

*Supervisory Review is the first type of review and is applicable to all documents.
**Research and Methods Assistant Division Chief in economic divisions (CSD, EPCD, ESMPD, FTD, MCD, SSD), in Field Division, or Assistant Division Chief in DSMD, DSSD, and SRD.

Coordination of Conferences, Meetings, and Other Forums for Paper Presentations.

Various offices are responsible for the coordination of several regular technical meetings and conferences as listed in Table 2. The coordinator will ensure that the proper paper reviews are conducted. The presenter's division chief is responsible for the content/subject matter and policies/procedures review, as well as for ensuring that a dry run is scheduled for the presenter with senior division management, including the Research and Methods Assistant Division Chief.

Table 2. Coordination of Census Bureau Staff Paper Review and Participation in Conferences and Meetings

| Conferences/Meeting | Coordinating Division |
|--------------------------------------|--|
| Joint Statistical Meetings (JSM/ASA) | Statistical Research Division |
| Population Association of America | Demographic Statistical Methods Division |
| American Economics Association | Office of the Chief Economist |

| Conferences/Meeting | Coordinating Division |
|---|---|
| American Association for Public Opinion Research | Statistical Research Division |
| Federal Committee on Statistical Methodology (FCSM) & Other U.S. Technical Meetings & Conferences | Associate Director for Methodology and Standards |
| International Conferences & Economic Commission of European (ECE) Workshops | Associate Director for Methodology and Standards |
| SAS Users | Systems Support Division; contact: SAS Users' Group in Systems Support Division |
| Census Bureau Advisory Committee Meetings & National Academy of Sciences | Designated Coordinating Office |

3. **Clearance of Documents.** The review and time schedule for the clearance of documents is the responsibility of the author's associate director or designee. Supporting Document B provides an example of a paper clearance and routing form.
4. **Clearance for Participation in Public Events.** External, public meetings are important to the Census Bureau's mission and to the quality of the products we produce. The Director and Deputy Director are to be kept informed of participation in external, public meetings. Employees who wish to sponsor, organize, or participate in an external or public meeting should complete the Proposed Event Participation document (Supporting Document C) in advance of making firm commitments and send it to their Associate Director. The Associate Director will evaluate these descriptions and forward those being recommended to the Office of the Director for final approval. Note that an Associate Director could recommend an individual as a discussant or panel participant based on the expertise of the individual.

Responsibilities

Program areas will be responsible for the following:

- the preparation of the appropriate information/materials based on these standards; and
- the clearance procedure outlined in this standard.

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

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

Implementation

Implementation starts immediately.

Inquiries

Inquiries relating to the interpretation of these standards should be addressed to the Methodology and Standards Council.

Supporting Documents

- A. Policy Review Checklist
- B. Clearance and Routing Form
- C. Proposed Event Participation

Recommended by Census Bureau Methodology and Standards Council:

Signed Cynthia Z.F. Clark, March 1, 2004

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

Signed Robert N. Tinari, March 1, 2004

Robert N. Tinari
Chief, Computer Assisted Survey Research Office

Signed Rajendra P. Singh, March 1, 2004

Rajendra P. Singh
Chief, Decennial Statistical Studies Division

Signed Alan R. Tupek, March 1, 2004

Alan R. Tupek
Chief, Demographic Statistical Methods Division

Signed Howard Hogan, March 1, 2004

Howard Hogan
Chief, Economic Statistical Methods and Programming Division

Signed Ruth Ann Killion, March 1, 2004

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

Signed Tommy Wright, March 1, 2004

Tommy Wright
Chief, Statistical Research Division

Concurrence:

Signed Preston Jay Waite, March 1, 2004

Preston Jay Waite
Associate Director for Decennial Programs

Signed Nancy M. Gordon, March 1, 2004

Nancy M. Gordon
Associate Director for Demographic Programs

Signed Frederick T. Knickerbocker, March 1, 2004

Frederick T. Knickerbocker
Associate Director for Economic Programs

Signed Marvin D. Raines, March 1, 2004

Marvin D. Raines
Associate Director for Field Operations

Signed Lawrence A. Neal, March 1, 2004

Lawrence A. Neal
Associate Director for Communications

Signed Gloria Gutierrez, March 1, 2004

Gloria Gutierrez
Assistant Director for Marketing and Customer Liaison

Signed Gerald W. Gates, March 1, 2004

Gerald W. Gates
Chief, Policy Office

Signed Cynthia Z.F. Clark, March 1, 2004

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