My name is Deborah Stein and I’m submitting these comments on behalf of the Partnership for America’s Children, which is one of the leaders of Count All Kids.

I want to draw your attention to research on the August 2022 Differential Privacy demonstration product conducted by Dr. Bill O’Hare available at our website CountAllKids.org. His research found many smaller geographic areas have high levels of error in their data on young children after DP is applied. The errors are so large that they could have important implications for federal and state funding received by schools and for educational planning. Errors of this magnitude might impact formula funding that is based on Census-derived data such that some schools would get less than they deserve given their true population size. It could also distort demographic projections of school population, affecting plans for school buildings and class size. We urge the Census Bureau to try and reduce or eliminate these large errors.

We also note that the August demonstration product continues to produce highly implausible results. It shows 163,077 blocks nationwide (1.5 percent of all blocks) that had population ages 0 to 17, but no population ages 18 or over, compared to only 82 such blocks before DP was applied. This unlikely large number of blocks with children and no adults may undermine confidence in the overall Census results.

These implausible results are likely due to young children being separated from their parents in Census DHC processing with differential privacy. This separation of children and parents in data processing is an ongoing concern for data on young children and the production of future tables for children. To understand the well-being of children, it is critical to understand the situation of a child’s parents or caretakers.

Moreover, if the same separation of children from their parents and caregivers occurs in the application of DP to the American Community Survey, it will eliminate reliable child poverty data which is based on household income. Child poverty rates are one of the most important measures of child well-being. Accordingly, we continue to urge the Bureau to develop formal privacy processes for the American Community Survey and other surveys such as the CPS, that keep the data on children and adults in the household connected.