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To the Directors and Ministers responsible for Canada's Statistical Agencies: British Columbia, Quebec, Northwest Territories, Statistics Canada,

Will the Ministers and Directors implement formal policies and clear accountabilities for the review processes of analytic products used to inform policy as set out by Former Statistics Canada Chief Statistician, Ivan Fellegi :

"The widespread nature of analytic activities, and the intrinsic risks that are associated with it, required that we develop formal policies and assign clear accountabilities for the review processes that we consider as being essential."

"We therefore have a written policy which mandates that all analytic products must be subjected to a dual review: by peers and by supervisors. The director of any area which is engaged in analytic activities is responsible for managing the execution of the policy of dual review and to monitor its effectiveness."¹

Official Statistical Agencies in Canada do not always publish the correct data or methods to accompany 'findings' in analytical products. For example, for over a decade, between 1998 and 2011, BC Statistics did not publish the many changes to British Columbia's (BC) population estimation and projection methods. In 2011, BC Statistics' Executive Director, Angelo Cocco, explained one of the many changes:

"After extensive analyses it was later determined that telephone line data (Telus) was a suitable indicator and was subsequently added to the model in 2000."²

Please be aware, persons in positions of authority for BC Statistics did not allow internal or external peer reviews of the use of the change in telephone line connections added to the model in 2000, along with electrical connections, as symptomatic indicators of population change, nor was the use of these indicators together published nor made known to peers including Statistics Canada for an assessment in 2004/05 of methods for Canada's equalization payments:

"BC Stats produces its CSD-level population estimates using regression methods with specific symptomatic indicators (number of residential electrical connections and Old Age Security (OAS) recipients). For more details on the methodology, see Generalized Estimation System (GES), Small Area Population Estimation Methodology published by BC Stats in 1998 and available on their website."³

¹ United Nations Economic and Social Council, Statistical Commission and Economic Commission for Europe, Conference of European Statisticians, 47th plenary session, "Analytic Activities at Statistics Canada", submitted by Statistics Canada, prepared by Ivan Fellegi, 1999, Sect VI, paragraph 16, page 7.

² GENERALIZATION ESTIMATION SYSTEM (GES) Small Area Population Estimation, Method and Error Evaluation, BC Statistics, August 2011, (GES 2011), page 8. For information about the extent of the "extensive analysis" see the summary of the Methods for Projections session presentation "Population Projections for Community Members", hosted by the Canadian Population Society at the 2013 Congress organized by the Federation of Humanities and Social Sciences: www.wminformatics.com/PopulationProjections/CPS_PPP_Validate.pdf.

³ All of Canada's 4 statistical agencies, BC, Quebec, Northwest Territories, and Statistics Canada contributed to "The Equalization Program and the Property Tax Base: Feasibility Study Conducted by Statistics Canada", February 28, 2005, page 63. The Feasibility Study, I received in June 2012 from Statistics Canada, revealed that my former employer, BC Statistics Population Section manager, Dave O'Neil, and Executive Director, Don McRae provided

To safeguard analytic activities from “intrinsic risks” Dr. Fellegi specifically addresses peer reviews⁴:

Peer review must cover the following:

- assessment of the author’s interpretations and conclusions;
- avoidance of statements that are not statistically valid or justifiable;
- ensuring that interpretive statements can be linked to reported measurements or to established methods;
- assessment of methods used;
- validation of the correspondence between numbers or data patterns cited in the text and any supporting tables or charts;
- ensuring that all analytic assumptions are explicitly articulated;
- ensuring that data quality limitations have been flagged where appropriate.

false reports to Statistics Canada for the Feasibility Study. Mr. McRae initiated/championed the use of telephone line data as an indicator of population change. I contend Mr. O’Neil and Mr. McRae also falsified documents to have me dismissed so that I (BC Statistics Population Analyst, 2002 to 2006) would not find out and could not reveal that Don McRae and Dave O’Neil falsified reports to Statistics Canada. My unresolved grievance shows that on the day after the Feasibility Study was released, Dave O’Neil angrily called me into his office accusing me of making a personal attack against a female co-worker. Mr. O’Neil said he did not have time to make this a formal reprimand, nor could he provide details of what he considered to be the problematic behaviour. March 7, Mr. O’Neil, gave me a pamphlet for the BC Government Employees Family Assistance Programme, for employees with documented work performance problems believed to be caused by personal problems. Having an excellent work record (reviewed February 8, 2005) with no documented work performance problems (indeed I had corrected many of the models and initiated the successful estatsBC project), I asked to meet with the shop steward, Marvin Paxman, and Mr. O’Neil the next day. At this meeting, Mr. O’Neil said that the female co-worker (a research officer) was a “frustrated manager” (?); nonetheless, we agreed to work towards a positive work environment. On March 16, Mr. O’Neil told me to write an article based on a dataset he created. I submitted the article to Mr. O’Neil who was to check it before going to the Executive Director, Don McRae. March 29, Mr. O’Neil showed me the article now covered with large red X’s and heavily applied red strokes, made by Don McRae, through numbers and many sentences from the beginning to the end of the 5 page article. I pointed out that it was he, Mr. O’Neil, who had told me which dataset to use as the source for the numbers. Mr. O’Neil then told me that I should have used another dataset (comp0412). Mr. O’Neil never volunteered that he was responsible for having told me to use the wrong dataset. I requested to meet with both McRae and O’Neil. The next day, Mr. McRae appeared to be very relaxed and disinterested in addressing corrections. He did not ask how this happened nor how this would not happen again. I pointed out that if the dataset had been correctly labelled, I would have caught the errors. I recommended that the labels be revised. McRae, leaning back in his chair, said maybe the labels would be changed. Thereafter, I was subjected to increasing discrimination including aggressive yelling, removal from all responsibility, not invited to section meetings, removed from the contacts list, denied mediation to address the accusation (October 13, 2005) of not being able to control my behaviour said to cause my co-workers to fear for their safety. I was told by Mr. McRae that the resolution to my grievance would be that there be “no resolution” (December 12, 2005). Ten days after forwarding my grievance describing dysfunctionality to Deputy Minister Gordon Macette, Mr. O’Neil, with Mr. Paxman (now acting Executive Director of BC Stats) present, told me to close the office window, leave my computer on, gather my belongings, turn in my security pass and vacate the building. I contend, the article covered in heavily applied red strokes and X’s, along with the accusation of making co-workers feel unsafe, were made by Don McRae and Dave O’Neil to portray me to be a despicable person and bad at my job to the BC Public Service Agency and BC Government Employees Union representatives, in an effort to dismiss me so that I would not find out and could not reveal that Don McRae and Dave O’Neil falsified reports to Statistics Canada. I continue to request mediation/arbitration into the real matters in dispute to proceed and request that “just cause” and “insubordination” be removed from my employment record.

⁴ Fellegi, 1999, Sect VI, Some safeguards: review of analytic products, paragraph 17, page 7

Accordingly, the source for quotes (including quotes used to assert the “ integrity” of an Official Statistical Agency) must also be provided.⁵ For example, the request for the title of the Feasibility Study wherein it was discovered that BC Statistics falsified reports to Statistics Canada’s was denied by persons in positions of authority for the government of British Columbia claiming:

“Disclosure harmful to intergovernmental relations and negotiations”⁶

6. Also, regarding forecasting versus projections (used, for example, to justify opening or closing of public facilities including schools), will the Ministers agree to produce sets of well-defined projection scenarios rather than a forecast as described by Dr. Fellegi:

"Statistics Canada does not carry out forecasting as such, but it is definitely engaged in projections. Forecasting pretends to foretell the future, while the projection is an analytic tool which -- within the constraints of a tightly specified model -- enables the analyst to consider the implications of alternative scenarios. The issue of scenarios is important: in order to underline the analytic character of projections, it is our policy to publish always a set of possible projections, each corresponding to a well-defined an [sic] analytic scenario."⁷

7. For example, BC Statistics publishes one forecast without providing correct methods rather than always publishing a set of well-defined possible projection scenarios.⁸

8. Given the presence of “intrinsic risks” (including false reporting) associated with analytic activities, will Ministers and Directors responsible for Canada’s Statistical Agencies, British Columbia, Quebec, Northwest Territories, Statistics Canada agree upon and make public formal policies and clear accountabilities for the review processes of analytic products, and, rather than forecast, always publish a set of possible projections, each corresponding to a well-defined analytic scenario.

Yours truly,



William Warren Munroe

cc. Canadian Population Society, Canadian Provincial and Territorial Premiers and Government Leaders

⁵ Assistant Deputy Minister Service BC, Betty-Jo Hughes on behalf of the Honourable Dr. Margaret MacDiarmid, Minister of Labour, Citizens' Services and Open Government referred to a statement in the Feasibility Study: "...population estimates produced by three provincial/territorial statistical agencies (Quebec, British Columbia [represented by Mr. O'Neil], Northwest Territories [represented by Angelo Cocco]) were all found to be of better quality when compared with those based on any of the three STC methods. " ; however, the citation was withheld as the Feasibility Study revealed the false reporting www.wminfomatics.com/WP/home.html, November 22, 2011.

⁶ Cindy Elbahir, Manager, Central Agency Team, Information Access Operations, June 22, 2012. Document posted at www.wminfomatics.com/WP/Articles/120622/FOI_STC_Finance.pdf. To the many requests for “the provision of citations to accompany quotes (rather than claiming disclosure harmful), and the provision of correct methods to accompany findings (rather than incorrect methods)”, ServiceBC ADM Angelo Cocco, on behalf of Minister Andrew Wilkinson, replied "we do not see value in continuing to respond to enquiries of a similar nature" Document posted at www.wminfomatics.com/WP/Articles/130924/ACocco130916.pdf

⁷ Fellegi, 1999, Sect II, paragraph 10, page 5

⁸ See the forecast presented by a BC Medical Health Officer in 2013, developed by BC Stats in 2011 (before the release of the 2011 census counts) at www.wminfomatics.com/WManalytics/Articles/140318/QSDFR_PPP_5.html as well as a new, lower forecast of enrolment without methods created by a contractor used to justify closing public schools at www.wminfomatics.com/WManalytics/Articles/140225/QSDFR2013_14.html