



AMERICAN STATISTICAL ASSOCIATION  
Promoting the Practice and Profession of Statistics®

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August 22, 2018

The Honorable K. Michael Conaway  
Chair, Committee on Agriculture  
United States House of Representatives  
Washington, DC 20515

The Honorable Collin Peterson  
Ranking Member, Committee on Agriculture  
United States House of Representatives  
Washington, DC 20515

The Honorable Pat Roberts  
Chair, Committee on Agriculture, Nutrition, and  
Forestry  
United States Senate  
Washington, DC 20510

The Honorable Debbie Stabenow  
Ranking Member, Committee on Agriculture,  
Nutrition, and Forestry  
United States Senate  
Washington, DC 20510

Dear Chairs Roberts and Conaway and Ranking Members Stabenow and Peterson,

I write as president of the American Statistical Association (ASA) to respectfully request you exercise your authority to maintain the USDA Economic Research Service (ERS) as a strong and independent statistical agency. We have serious concerns that the August 9 USDA proposal to organizationally realign and relocate ERS out of the Washington area will undermine ERS work and product quality. This proposal will reduce ERS's ability to contribute to evidence-based policymaking in the USDA and, more broadly, for food, agriculture, and the environment.

The ERS is ranked #3 in the world of institutions in the field of agricultural economics (out of 2,512 institutions).<sup>1</sup> Given the portion of the U.S. economy dealing with food, agriculture, and the environment, along with the importance of these areas to our health and well-being, ERS should be kept in the Washington area and under the Research, Education, and Economics Mission Area to maintain its independence and premier work.

The ERS also should stay in the Washington area to maintain the quality and relevance of its work. A sizable portion of the 330 ERS employees will not have the wherewithal to or interest in relocating their families outside the Washington area. The resulting staff loss due to the relocation will likely jeopardize ERS's quality work for decades. The ERS should also stay in the Washington area to remain close to its primary clients. This will ensure continued close and necessary collaboration with the National Agricultural Statistics Service, Agricultural Research Service, and other USDA agencies. It will also ensure

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<sup>1</sup> <https://ideas.repec.org/top/top.agr.html#institutions>

close coordination and contribute more effectively to efficiencies and best practices within the 12 major federal statistical system agencies, which are all within the Washington area.

The ERS should remain in the USDA Research, Education, and Economics (REE) Mission Area and not be moved to the Office of the Chief Economist (OCE). REE is the information-producing arm of the USDA that informs the work of not just the USDA, but also the food and agriculture community more broadly. Reporting to the OCE would jeopardize ERS's decades-long standing as an independent and credible statistical agency (a standing granted by the Office of Management and Budget), because one of OCE's roles is to support the position of the Secretary of Agriculture. It is also important to keep ERS in REE to ensure its research portfolio remains broad and sufficiently interdisciplinary.

We ask you to reject this proposal so ERS can continue producing its products at the same high quality and with the same credibility, relevance to national discussions, and timeliness.

Please see the attachment for elaboration on the ASA's concerns for this move.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink that reads "Lisa LaVange". The signature is written in a cursive, flowing style.

Lisa LaVange, Ph.D.

CC:

The Honorable Sonny Perdue, Secretary, US Department of Agriculture  
Members of the House Committee on Agriculture and the Senate Committee on Agriculture, Nutrition,  
and Forestry

*An identical version of this letter was sent to the leadership of the House and Senate Appropriations Subcommittees on Agriculture, Rural Development, Food and Drug Administration, and Related Agencies and copied to its members.*

## Attachment: Elaborating on concerns of relocating and realigning ERS

The American Statistical Association's concern for the quality of ERS work and its ability to support evidence-based policymaking at USDA arises for several reasons. Primary among them, ERS is sure to lose a substantial portion of its staff who are not willing or able to relocate outside of the Washington, DC, area. The ERS is composed of a unique combination of staff—including those with expertise or training in economics, agriculture, sociology, nutrition, agricultural economics, and statistics—that is effective because of the staff members' interdisciplinarity. We believe there is a strong likelihood the ERS relocation outside the Washington area would jeopardize ERS's ability to maintain its quality work for years to come because of the staff loss. Just as it has taken years to build such a staff, it would take years to rebuild it in another location.

We are also concerned about the move out of Research, Education, and Economics (REE) to the chief economist's office beyond the policy-informing versus policy-support roles discussed in our letter. The ERS mission is well aligned with the other components of REE and contributes to the portfolio's overall value. In particular, as transdisciplinary research becomes ever more important to solving grand challenges, it is beneficial to have the economics and social science research from ERS informing the physical and biology research supported by the National Institute of Food and Agriculture and Agricultural Research Service. Such synergistic activity is best facilitated by having all the agencies within REE.

Further, it is critical for ERS to maintain its status as an independent federal statistical agency so its products are viewed as objective and credible by all stakeholders. The relevant guidance for a federal statistical agency, as you know, is laid out in Office of Management and Budget (OMB) policy directives—especially Statistical Policy Directive #1—and in the National Academies' *Principles and Practices of a Federal Statistical Agency*.

We also believe in the following strong justifications for keeping ERS in the Washington, DC, area:

- Many of ERS's primary product users, including USDA, are in Washington. It is sensible that ERS remain near such users of its products to interact first hand. As one example, when the Interagency Commodity Estimates Committees meet to develop the World Agricultural Supply and Demand Estimates report, ERS should be present.
- The location facilitates the close collaboration between ERS and the National Agricultural Statistics Service on the Agricultural Resource Management Survey and other programs.
- As one of 13 primary federal statistical agencies in a distributed statistical system, all of which are located in the Washington area, ERS's integration to the broader system is facilitated in part by proximity. Under the guidance and coordination of the OMB chief statistician's office, these agencies are in regular contact on joint projects, best practices, and shared challenges. Indeed, ERS has been a leader in taking advantage of new data sources and addressing challenges facing all the agencies. Locating ERS out of the Washington area puts ERS at risk of alienation from the other federal statistical agencies, which could jeopardize the quality of its work.
- As a federal statistical agency, ERS is bound by the Confidential Information Protection and Statistical Efficiency Act (CIPSEA) and the OMB Statistical Policy Directive (SP) #1, which affords ERS its authority to collect data among other benefits and protections. The chief statistician's

office assures each agency's compliance with CIPSEA and SP #1. ERS should remain in the Washington area to facilitate ERS maintenance of its CIPSEA status.

We are also concerned about the scant justification provided for this move. USDA stated that ERS's staff average annual attrition rate over the last five years being higher than that of USDA—16.5% versus 12.0% for USDA—is the problem they are trying to address. Despite years of interaction with ERS, this is the first we or other ERS stakeholders have heard of staff attrition being such a problem. Further, it is far from clear that recruitment and attrition will not be a problem in another location. Indeed, the Washington area has many advantages for staff recruitment and retention. We are also concerned with the speed at which USDA seeks to execute this proposal. Such a move with the risks detailed above deserves careful consideration.