



# American Statistical Association

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The Honorable John Holdren  
Director, Office of Science and Technology Policy  
The White House  
Washington, DC 20502

Dear Director Holdren,

As president of the American Statistical Association, with its 18,000 members, I thank you for addressing the May 8, 2009, symposium on the federal statistical system at the National Academies. Your participation was clear evidence of the strong support of the Obama Administration for the statistical agencies and the important scientific role they play in facilitating important policy decisionmaking. I also appreciate the administration's more general support for the role of science in informing policy and for scientific integrity as expressed in the March 9, 2009, Memorandum on Scientific Integrity and on the OSTP web site.

As you are aware, the statistical agencies are more important than ever in providing reliable information about current administration priorities—the impact of the ARRA investments, changes in the number and quality of jobs held by American workers, the effect of educational reform, and the impact of changes in energy regulations, to name just a few. Indeed, the Congressional Budget Office, Joint Tax Committee, and Office of Tax Analysis, for example, as well as the scientific community, rely heavily on federal statistical data for their analysis. I write now out of concern that the most important source of evidence for policy decisions is under threat. I wish to solicit your help to further ensure the scientific integrity and operation of the federal statistical agencies and to draw your attention to new challenges to statistical agencies' autonomy.

The most current pressing issues are plans for information technology centralization at the Department of Agriculture and Internal Revenue Service. This centralization would undermine the ability of key statistical agencies to provide high-quality statistical data, specifically the National Agricultural Statistics Service, Economic Research Service, and Statistics of Income Division at IRS. It is essential for statistical agencies to maintain control of their IT resources for three primary reasons. First, for a statistical agency to keep the trust of its data providers, it must be seen as insulated from other entities. Such insulation is lost without control of IT resources. Second, to provide timely reports and respond nimbly to requests, statistical agencies must have ready, direct access to their data, which would not be the case if employees have to access their data through a centralized IT office that may have

different priorities. Finally, the greatest strength of a statistical agency is its personnel, who consist of multidisciplinary project teams that work successfully hand-in-hand with years of institutional knowledge, training, and experience. Dismantling these teams would undermine the effectiveness and efficiency of a statistical agency and greatly lessen its ability to maintain sustainable human capital.

Another important issue for statistical agencies is their credibility, as this is the foundation of their usefulness in informing policy. They need the authority to have final say over all their products, including press releases. Without such authority, the products are prone to be perceived as subject to outside influence. For the Bureau of Justice Statistics (BJS), “final authority over all functions” was transferred from the BJS director to the director of Office of Justice Programs in the PATRIOT Act and later to the attorney general. For the National Center for Education Statistics (NCES), the law is ambiguous regarding whether the NCES commissioner or director of the Institute of Education Sciences has final authority over NCES products. I understand Congress may be reconsidering this legislation in the next year.

While I believe the rationale for statistical agency autonomy is clear and understood by you, I note that The National Academies’ document *Principles and Practices for a Statistical Agency* (fourth edition, National Research Council, 2009) specifically addresses these issues in the commentary section of the “strong position of independence” principle:

- i) “Other characteristics related to independence are that a statistical agency has the following: ... Authority to control information technology systems for data processing and analysis in order to securely maintain the integrity and confidentiality of data and reliably support timely and accurate production of key statistics.” (p. 23)
- ii) “[The trust of its data providers and data users] is fostered when a statistical agency has control over its information technology resources and there is no opportunity or perception that policy, program, or regulatory agencies could gain access to records of individual respondents ... A statistical agency also needs control over its information technology resources to support timely and accurate release of official statistics, which are often produced under stringent deadlines.” (p. 24)
- iii) “Authority to release statistical information and accompanying materials (including press releases) without prior clearance by department policy officials is important so that there is no opportunity for a perception of political manipulation of any of the information.” (p. 25)

I believe the issues listed above are in concordance with the March 9 memo, particularly the line, “The public must be able to trust the science and scientific process informing public policy decisions.” They also are in agreement with the OSTP web site language (accessed July 2009): “The Obama administration and the Office of Science and Technology Policy are committed to restoring science to its rightful place in America as a tool for crafting smart policies that will strengthen the nation.” I therefore request your help in addressing these issues and will ask the ASA Director of Science Policy, Steve Pierson, follow up with your staff to discuss next steps.

Sincerely,



Sally C. Morton, PhD