



American Statistical Association

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November 2, 2009

The Honorable Arne Duncan
Secretary, Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

Dear Secretary Duncan,

As you develop your guidance for reauthorization of the Institute of Education Sciences (IES), I write to ask you to include provisions to ensure the professional autonomy, authority and stature of the National Center for Education Statistics (NCES).

NCES' autonomy and authority are a requisite for its products and data to be objective, accurate, and publicly accepted—all essential requirements to the central purpose of informing national education policy. For its products and data to be so regarded, NCES should have explicit final authority over its publications—including press releases—to avoid perception of any outside influence, including political. Such authority was previously held by NCES, but was made ambiguous in the 2002 IES legislation and in the implementation that followed.

Bolstering NCES' stature will help to better inform policy decisions within the Department of Education. A weak NCES does not serve this, or any, administration's purposes. That the NCES commissioner is a presidential appointee, with approval by the Senate, who serves for a fixed term, is important in this regard.

More direct access by NCES to the secretary's office, and the resulting participation in policy meetings of senior department officials, would help better inform the department's education policies. The commissioner of education statistics would contribute greatly to inform department-wide decisionmaking because of his/her command of an extraordinary array of information on education at all levels and on a range of topics—from outcomes to investment of resources for education to characteristics of schooling. Further, by hearing first-hand the senior-level policy discussions, the commissioner would be better equipped to direct NCES resources to provide data to inform any policy.

Such access would also further strengthen NCES and heighten the credibility of its products, as sufficient stature within the department is necessary for the commissioner to speak for the integrity of NCES products, protect against infringement, and ensure adequate budgeting. Stronger, more credible NCES products as the foundation of department policy decisions would buttress those decisions in reality and perception.

Bolstered NCES stature could also address leadership continuity because a higher profile commissioner is more likely to be appointed and approved quickly. NCES has had an acting commissioner for nearly a year, and the previous commissioner served only half of a six-year term after three years under acting commissioners.

The rationale for these measures to ensure the objectivity and accuracy of NCES products and heighten NCES stature is straightforward. Nevertheless, I wish to point out that our recommendations are consistent with the National Academies' *Principles and Practices for a Federal Statistical Agency*, which the ASA Board of Directors endorsed this spring. In particular, "a strong position of independence" is one of its four key principles. The ensuing guidance for this principle includes a recommendation for presidentially appointed, Senate-approved heads and the following:

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 or perception of political manipulation of any of the information. (p. 25)

It is also desirable that a statistical agency head have direct access to the secretary of the department ... (p. 23)

I believe you understand and appreciate our recommendations, given the emphasis you and President Barack Obama have placed on objective data informing policy and evidence-based decisionmaking. Indeed, I was heartened by your mentions of "independence" with respect to IES and research in your June speech at this year's IES research conference.

The American Statistical Association looks forward to working with you and this administration and requests you include our recommendations in your guidance to Congress for the IES reauthorization.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Sally C. Morton". The signature is fluid and cursive, with a long horizontal stroke at the end.

Sally C. Morton, PhD
President, American Statistical Association

Cc: John Q. Easton, Director, Institute for Education Sciences; Marshall Smith, Secretary's Office