



American Statistical Association

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April 23, 2009

The Honorable Peter Orszag
Director, Office of Management and Budget
Eisenhower Executive Office Building
Washington, DC 20503

Dear Director Orszag,

As president of the American Statistical Association, I write to express our concern about the ramifications information technology (IT) centralization within government agencies could have on the effectiveness and mission of federal statistical agencies in general. We are particularly concerned for the Statistics of Income (SOI) at IRS, where we understand decisions of IT control will be made very soon. In any decision that affects a federal statistical agency, we ask you to ensure that a statistical agency's ability to carry out its work effectively and efficiently not be undermined.

We understand and appreciate the security issues driving IT centralization, as well as the mandates of the *Federal Information Security Management Act of 2002* (FISMA). Just as important, we understand the confidentiality issues—the safeguards for which are set forth in the *Confidentiality Information Protection and Statistical Efficiency Act of 2002* (CIPSEA) and *CIPSEA Implementation Guidance* (2007)—and the respect for which are paramount to federal statistical agencies and programs.

We ask you to carefully consider the missions of the federal statistical agencies and the CIPSEA issues as decisions about IT centralization are made. CIPSEA, in short, requires that data, collected under a pledge of confidentiality and for exclusively statistical purposes, be used for statistical purposes only. The relationship of confidentiality to control over IT resources is emphasized in *Principles and Practices for a Federal Statistical Agency* (fourth edition), in the discussion of the 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.” (p. 23).

We fear IT centralization could jeopardize the CIPSEA pledges statistical agencies must make, as well as their autonomy, both of which are vital to a statistical agency’s effectiveness. We ask that the following questions be considered:

How can a statistical unit ensure the data in its stewardship will be used exclusively for authorized statistical purposes if that unit does not retain control of the access to and use of its confidential data?

How would potential respondents react to data requests by a statistical agency that cannot make the confidentiality pledge (as the head of IT of the host organization would presumably be the individual to take the CIPSEA pledge)?

If a statistical agency were to surrender access control of its data, does the department assuming control of those data have the necessary safeguards in place to honor the CIPSEA pledge?

Would the statistical unit be violating its past pledges of confidentiality to respondents if it were to surrender access control to the IT organization of its host department?

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

Cc: Lawrence Summers, Director, National Economic Council; Rob Nabors, Deputy Director, OMB; Vivek Kundra, Federal Chief Information Officer, Office of E-Government and Information Technology, OMB; John Holdren, Director, Office of Science and Technology Policy