



September 16, 2014

Shaun Donovan
Director, Office of Management and Budget
Executive Office of the President
725 17th Street, NW
Washington, DC 20503

Dear Director Donovan:

We are writing on behalf of the American Educational Research Association (AERA) and the American Statistical Association (ASA) to ask that the Office of Management and Budget (OMB) help on a time-sensitive and critical matter. We want to ensure that the National Center for Education Statistics (NCES) not be further reduced in independence and efficacy through passage of H.R. 4366, the Strengthening Education Through Research Act (SETRA). This bill passed the House in May, without sufficient attention to the important responsibilities and functions of this statistical agency and its significant leadership role since 1867.

Our sense of urgency and turning to you for direct help is that the Senate HELP Committee is scheduled to markup this bill on Wednesday, September 17. Unfortunately, none of the small number of changes in the managers' amendment filed yesterday aims to restore and maintain the independence and integrity of NCES in accord with the longstanding guidance of the National Academies (*Principles and Practices for a Federal Statistical Agency*) and, in particular, the commendable guidance set forth in the OMB *Statistical Policy Directive: Fundamental Responsibilities of Federal Statistical Agencies and Recognized Statistical Units* (Policy Directive No. 1, pending).

Over the last several months, we along with other scientific societies (see attached) have met with key staff of every member of the Senate Committee on Health, Education, Labor, and Pensions (HELP) to make clear the principles under which statistical agencies must operate and why the Commissioner of NCES should be retained as Presidentially appointed and restored as Senate confirmed (longstanding until 2012). In these visits, we were impressed with the broad awareness of NCES, use of the data and statistics it provides, and appreciation of the issues we raised. There was wide support from congressional staff for the modest but significant changes we sought, and we found no strong opposition. While we appreciate the spirit of bi-partisanship that now drives seeking reauthorization of IES this week, the consequences for NCES of passage of H.R. 4366, as modestly amended, are fully unacceptable.

Both of our organizations applaud OMB's leadership role on matters of federal statistics, data, and the role of the federal statistical agencies. We both praised and supported the aims and intent of Directive No. 1 during the open comment period. We are turning to you now—as time runs out—because of the significance of the issue, the expertise you have, and the bipartisan respect for OMB.

We believe that, without immediate action, one of the lead statistical agencies in the federal system faces functional reduction in scope, authority, and stature if H.R. 4366 passed as adopted by the House and only minimally amended by the Senate HELP Committee. Through very small, but significant amendments, SETRA could foster the vitality of NCES and insulate this agency from becoming just another organizational unit within IES.

Our fact sheet includes four priority changes to SETRA. The first—a commissioner that is Presidentially appointed and Senate confirmed—we consider to be threshold for NCES within IES, including to ensure that IES has independent advice upon which to set its research priorities. Having this position become a staff role hired by the Director of IES (as SETRA sets forth) is simply not a viable way of securing the independence of NCES and the trustworthiness of NCES statistics and data reports.

The two most recent NCES Commissioners (Mark Schneider who served in the Bush administration and Jack Buckley who served as Deputy Commissioner in the Bush administration and Commissioner in the Obama administration) addressed their concerns about the further erosion of NCES under SETRA. We are attaching their letters submitted to HELP.

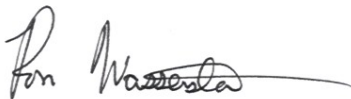
We do not ask you to intervene lightly. OMB is the one remaining path of expert guidance that could lead the Senate HELP Committee and the House Education and the Workforce Committee to achieve an essential end for NCES, for the U.S. statistical system, and for the children and public that NCES serves. We appreciate your consideration of this matter.

Cordially,



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Executive Director, American Educational Research Association



Ronald L. Wasserstein, PhD

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Cc: Howard A. Shelanski, Administrator, OIRA

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