



Comment on Phase Three of Leveraging Data as a Strategic Asset

July 5th, 2019

The American Statistical Association (ASA) is pleased to respond to [Docket Number USBC-2019-001 on phase three of *Leveraging Data as a Strategic Asset* \(84 FR 25730\)](#). The ASA is submitting comments relevant to request for comment four, which seeks “any edits and additional detail to ensure that they accurately and effectively describe needed activities.”

Before offering our specific comment, we would like to note that this elaboration of activities in the Draft 2019-2020 Federal Data Strategy Action Plan illuminates very effectively current plans for moving forward on the goal to “Leverage Data as a Strategic Asset.” The proposed activities include several that our community has advocated, such as:

- Developing a data protection toolkit
- Piloting a “one-stop” standard research application
- Improving geospatial data standards

Moreover, we applaud the creation of the Office of Management and Budget (OMB) Data Council and the Constitution of Diverse Data Governance Bodies in the agencies.

With respect to specifics, we comment on action 14 of the Federal Data Strategy, which states “data-driven decision-making requires not only accessible, high quality data but also a workforce with adequate knowledge of data security practices and data skills, including data science, statistics, and program evaluation.” We agree and note that this language complements the Foundations for Evidence-based Policy Making Act of 2018, which emphasizes the need for objective evidence provided by highly-trained statistical staff.

Unfortunately, principal federal statistical agencies frequently do not have a sufficient number of full-time equivalent (FTE) staff who are highly trained in statistical methodology and analysis. This understaffing leads to reliance on expensive, external contractors to analyze data that might otherwise have been done by statistical agency FTEs. Although multiple statistical agencies like the Bureau of Justice Statistics and the Bureau of Transportation Statistics are not staffed properly, one prominent example is the National Center for Education Statistics (NCES), where FTEs manage millions of dollars from the agency’s statistics and assessment budget line (Figure 1).

Twenty years ago NCES had 115 full-time and permanent staff; in FY17 and FY18 there were only 95 full-time and permanent staff members to manage the agency’s FY18 \$258.5 million budget for statistics and assessment. This FTE understaffing is alarming because it jeopardizes NCES’ ability to produce objective data for policymakers on a range of topics like school safety, the state of educational achievement in the United States, and teacher and principal characteristics.

To elaborate, a lack of FTEs at NCES limits the agency’s ability to independently report on school crime and safety in their annual Condition of Education Report. The National Teacher and Principal Survey, which has historically provided data on school characteristics like teacher and principal demographics every two years, may soon need to be implemented every four years partly due to inadequate staffing. NCES’ flagship program, the National Assessment of Educational Progress, doesn’t provide data on students’ proficiency in key subjects like science partly because the agency has too few personnel.

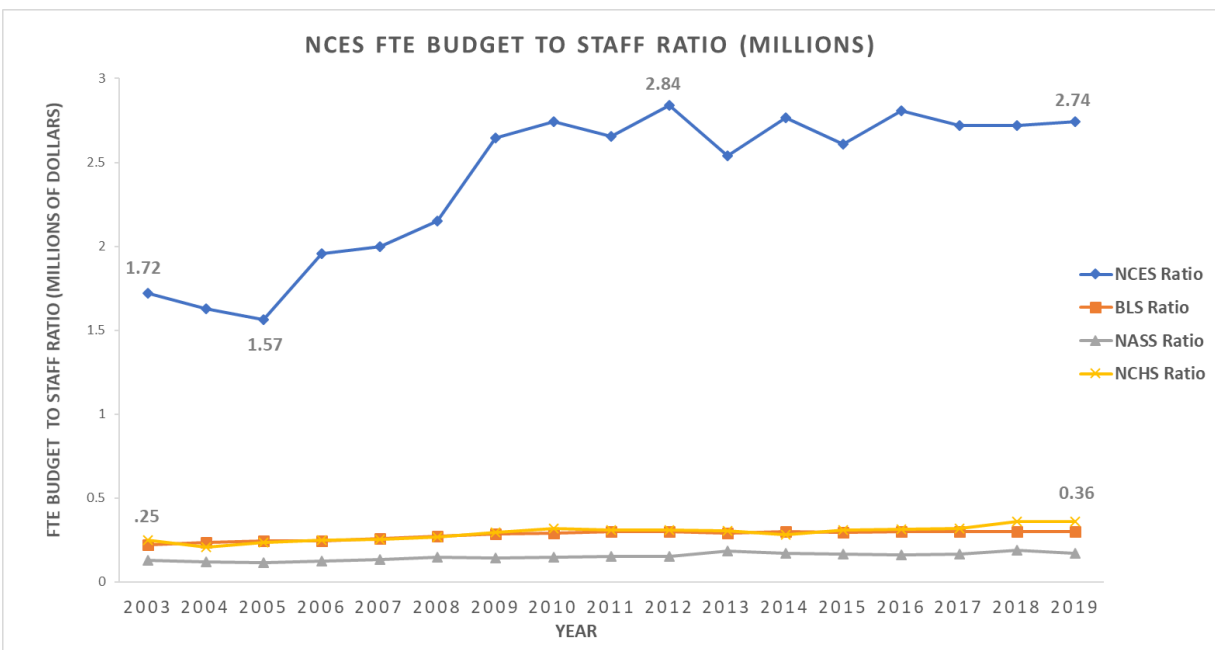


Figure 1. Budget to FTE staff ratio at NCES in millions of dollars (statistics and assessment line). Data publicly accessible.

FTE = Full-Time Equivalent; NCES = National Center for Education Statistics; BLS = Bureau of Labor Statistics; NASS = National Agricultural Statistics Service; NCHS = National Center for Health Statistics

The Federal Data Strategy and the Foundations for Evidence-based Policy Making Act of 2018 both emphasize the importance of data-driven decision-making to advance evidence-based policies. To help achieve this goal of building evidence-based policies, we believe that language in the Federal Data Strategy should more forcefully assert the need for sufficient numbers of highly trained FTEs working in principal federal statistical agencies. We respect the expertise of

Federal Data Strategy co-creators from the OMB, the Office of Science and Technology Policy, the Department of Commerce, and the Small Business Administration, to identify suitable language that is appropriately placed to address this problem. Such language that more forcefully addresses this understaffing will help leaders of principal federal statistical agencies to communicate their urgent need to hire and retain more expert statisticians to officials in their department, the executive branch and in congress.

We thank you for this opportunity to comment on the Federal Data Strategy and for your continued work to advance data-driven decision-making and evidence-based policies.

Thank you for your consideration.

Questions on this document can be directed to ASA Science Policy Fellow Daniel Elchert at daniel@amstat.org.