



AMERICAN STATISTICAL ASSOCIATION
Promoting the Practice and Profession of Statistics®

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March 23, 2020

The Honorable Roy Blunt
Chair, Appropriations Subcommittee on
Labor, Health and Human Services,
Education, and Related Agencies
United States Senate
Washington DC, 20510

The Honorable Rosa DeLauro
Chair, Appropriations Subcommittee on Labor,
Health and Human Services,
Education, and Related Agencies
United States House of Representatives
Washington DC, 20515

The Honorable Patty Murray
Ranking Member, Appropriations
Subcommittee on Labor,
Health and Human Services,
Education, and Related Agencies
United States Senate
Washington DC, 20510

The Honorable Tom Cole
Ranking Member, Appropriations
Subcommittee on Labor,
Health and Human Services,
Education, and Related Agencies
United States House of Representatives
Washington DC, 20515

Dear Chairs DeLauro and Blunt and Ranking Members Murray and Cole,

We write to respectfully urge your action regarding concerns we have for the National Center for Education Statistics (NCES). Our concerns pertain to longstanding but worsening issues and legislative proposals accompanying the FY21 budget request. Our goal is to ensure NCES maintains its excellence in delivering objective, timely, and reliable information to inform our nation’s education policies and to help our schools, students, and families thrive.

To ensure NCES continues serving its vital mission, we request inclusion of provisions in the FY21 appropriations bill that would enable NCES to rebuild internal capacity through hiring full-time, permanent staff. We also urge at least a 5 percent budget increase for the NCES statistics account that would partially redress its more than 20 percent loss in purchasing power since FY09. With respect to legislative proposals included in the FY21 request, we anticipate and hope you agree that transfer of NCES’s assessment responsibilities to a new center and removing

presidential appointment status of the NCES commissioner are better suited for consideration through authorization, but we express our strong opposition to both here.

NCES has an [ongoing staffing crisis](#) that has reached a point this year likely to result in terminations and cutbacks of critical statistical information programs. All federal statistical agencies conduct some of their work with government staff resources and contract with others—often specialized profit-making firms, but sometimes other federal agencies—to conduct the remainder. NCES has an exceptionally high budget-to-staff ratio, \$3 million/FTE, which is nine times the median of other federal statistical agencies. This means a higher proportion of the critical statistical data collection design and analysis—normally expected of federal employees—is, instead, performed by contractors. Compared with other statistical agencies, NCES staff resources are disproportionately allocated to overseeing contractors who perform many of these essential statistical activities. We believe this shift has gone too far for NCES to be a healthy statistical organization and strongly recommend Congress take explicit actions to address this condition in the FY2021 appropriation process. A set-aside allocation of 20 additional staff would provide a good start to rebuild NCES staff resources.

We also urge the NCES statistics account be funded at a level of at least \$115 million. As previously noted, this account has lost more than 20 percent of its purchasing power since FY09, when its budget was \$116 million. The loss of purchasing power is even greater since FY10–FY12, when the account was at \$125 million or higher, as shown in the attached figure. (Our recommended level does not include the \$3 million in the administration’s request that is transferred from the statewide longitudinal data systems for the Privacy Technical Assistance Center.) The requested increase of at least 5 percent will help NCES’s ability to track emerging education trends, reduce respondent burden, and provide more timely and regional data—efforts that are currently taxed due to both the loss of the agency’s purchasing power and its staffing crisis.

Among the surveys that should be prioritized for continuation are the School Survey on Crime and Safety (SSOCS) and the Fast Response Survey System (FRSS), which we understand may be discontinued until staff and funding are in place. SSOCS’s estimates of school crime, discipline, and disorder—as well as associated programs and policies—are essential to ensuring our schools provide safe learning environments for our nation’s children. FRSS was established to collect data quickly, with minimum response burden, to inform new policies and would be especially helpful in getting our schools back on track as we recover from the COVID-19 pandemic. Increased funding will also be necessary to create and maintain the Postsecondary Student Data System, a major new project in the College Affordability Act of 2019 currently working its way through Congress for reauthorization of the Higher Education Act.

Before closing, we turn to the aforementioned aspects of the administration’s FY21 ED request we hope you agree should be handled by the House and Senate authorizing committees. We believe both proposals will significantly undermine NCES’s work and autonomy. Indeed, we have [advocated since 2012](#)—when Senate confirmation of the NCES commissioner was removed—to restore it. Senate oversight of the NCES commissioner appointment would help ensure a qualified leader and objective education statistics for our nation. Conversely, removing the presidential appointment of the commissioner could further weaken the ability to provide objective and credible statistical data. As stated in a [2015 letter](#) that urged keeping presidential appointment and restoring Senate confirmation, such objective education statistics are “vital to our democracy, economy, governance, and well-being. All sides of a policy debate should be able to look to the statistical data as objective and high quality.”


Turning to the administration’s proposal to transfer assessments to a separate center in the Institute of Education Sciences, the data program of a modern government education statistics agency must cover a wide array of topics, just as those of health, agriculture, or other topical areas must. For education, examples include traditional areas such as how much money is spent, for what purposes, and how costs are borne by taxpayers. The statistical program also includes data on students enrolled and their characteristics. And it includes descriptions of the teaching resources available and how teachers are prepared. But the capstone measures are ones that inform the public about what students have learned. That information is of greatest help to the public when it can be associated with costs, teachers, and other aspects of education. Planning for the data collections, understanding how the data will be analyzed, and knowing what information the public and policymakers need to make informed decisions works best when the array of statistical studies are housed together and integrated. Among other things, that organizational arrangement will best facilitate making priority decisions across assessment studies and those in finance or demographics or teaching resources when tradeoffs must be made.

Thank you for your thoughtful consideration of this request and your sustained commitment to the advancement of evidence-based educational policy. The American Educational Research Association and American Statistical Association stand ready to work with you and your staff members to support these priorities.

Sincerely,



Felice J. Levine
Executive Director
American Educational Research Association



Ron Wasserstein
Executive Director
American Statistical Association

Katherine K. Wallman

Katherine Wallman
Chief Statistician of the United States
1992–2017

Nancy Potok

Nancy Potok
Chief Statistician of the United States
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Emerson J. Elliott

Emerson Elliott
Commissioner, National Center for
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Jack Buckley

Jack Buckley
Commissioner, National Center for
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2009–2013

CC: Members of the United States Senate and House of Representatives Appropriations Subcommittees on Labor, Health and Human Services, Education, and Related Agencies Leadership and Members of the Senate Committee on Health, Education, Labor and Pensions and House Education and Labor Committee.

