We separate staffing level (#7) from hiring (#4) to underscore how critical it is for an agency to have a staffing level commensurate with its budget. Most federal statistical agencies can use their budget for salaries, which allows them to determine the optimal mix of employees and contractors to carry out their work. The agencies that do not have this professional autonomy are overly reliant on contractors or other arrangements, which makes them less agile and efficient.

For #8, we include what Citro et al. (2023) discuss as “brand autonomy,” defined as priority placement of an agency’s name and logo on its website, products, and communications (e.g., letters to survey respondents). Brand autonomy is essential to building trust in an agency and its products, as well as reaching stakeholders. Brand autonomy is consistent with the Office of Management and Budget (OMB) Proposed Federal Rule, Fundamental Responsibilities of Recognized Statistical Agencies and Units, (“Trust Regulation”) mandate that each statistical agency shall maintain a website clearly branded with its name and “determine the content, functionality, appearance, and layout of its website” (OMB, 2023).

Item #9 is to facilitate direct communications with government officials regarding statistical information and activity for two reasons (a) when posing questions to a statistical agency on its products and topic areas, firsthand interactions with the statistical experts facilitate understanding and allow for clarifications and elaboration; and (b) as a key stakeholder, congressional interactions should be firsthand to ensure each agency’s information is conveyed accurately and to avoid questions about possible political influence on the data and its activities. This item is consistent with the following excerpt from Practice 2: Necessary Authority and Procedures to Protect Independence, from Principles and Practices for a Federal Statistical Agency: “Be able to meet with members of Congress, congressional staff, and the public to discuss the agency’s statistics, resources, and staffing levels” (National Academies, 2021).

This item is also consistent with the proposed Trust Regulation requirement that a statistical...
agency shall produce a budget request that is an independent part of the parent agency’s submission to the OMB.

Item #10 is to ensure that statistical agencies and public data users can meet to exchange information and promote transparency and that the agency can get feedback directly from the user community. This item satisfies the requirements of Practice 2, as mentioned above, and the mandate in Title 2 of the Evidence Act. The latter states that, on a regular basis, agencies publish on their website information on the usage of data assets by non-government users and assist the public in expanding the use of public data assets. From a transparency standpoint, it is critical that agencies be able to communicate directly with the public when releasing data, as well as receive input through federal advisory committees.

Citro et al. (2023) note that, while “not strictly an autonomy protection, procedures and practices promoting transparency … are an important complement.” To that, we add two more components that can help protect a statistical agency’s autonomy: (a) responsiveness to parent agency, congressional, and other requests; and (b) building of strong parent-agency relationships.

REFERENCES

