



COUNCIL OF PROFESSIONAL ASSOCIATIONS ON FEDERAL STATISTICS
2121 EISENHOWER AVE., SUITE 200, ALEXANDRIA, VA 22314
WWW.COPAFS.ORG 703-836-0404
OUR GOAL: LINKING YOU WITH A THRIVING STATISTICAL SYSTEM

June 18, 2014

Katherine K. Wallman,
Chief Statistician
Office of Management and Budget
10201 New Executive Office Building
Washington, DC 20503

Dear Ms. Wallman,

Thank you for the opportunity to comment on proposed Federal Statistical Policy Directive, *Fundamental Responsibilities of Federal Statistical Agencies and Recognized Statistical Units*, as published in the Federal Register, vol. 29, no. 98, May 21, 2014.

The Council of Professional Associations on Federal Statistics (COPAFS) has as its members, organizations representing over 303,000 individual researchers, educators, public health professionals, civic groups, and businesses that rely on the quality and accessibility of statistics that can only be effectively collected by the federal government. These users of federal statistics would benefit from the assurance of federal statistical reliability, objectivity, and freedom from political manipulation that this proposed Directive will provide.

The National Academies of Science's Committee on National Statistics' periodically issued *Principles and Practices for a Federal Statistical Agency* has, for 22 years guided and been voluntarily and enthusiastically adopted by officially designated federal statistical agencies. But various governmental organizations and appointees who do not have knowledge or appreciation of appropriate statistical functions and methodologies have on occasion challenged statistical agencies' independence, objectivity, devotion to timely reporting, or responsibility to broadly disseminate statistical findings. Also, federal appointees turn over frequently and do not often come into their positions with knowledge or familiarity with the responsibilities of managing a federal statistical program. By incorporating the *Principles and Practices for a Federal Statistical Agency* into a Statistic Directive, federal statistics' users would have increased confidence in the accuracy and reliability of the data on which they depend. The new Directive would also be valuable in reinforcing the principles necessary for a viable statistical system across the full sweep (rather than a limited set) of federal statistics providers. COPAFS thus strongly endorses this proposed Directive.

There are, however, several aspects of the proposed Directive on which I would like to comment.

1. Under proposed Responsibility #3, it is stated that "*Federal statistical agencies and recognized statistical units must function in an environment that is clearly separate and autonomous from*

the other administrative, regulatory, law enforcement, or policy-making activities within their Department.” We would interpret “other administrative” activities to include centralized information technology and centralized information storage and retrieval. IT systems that are out of the direct control of the statistical agency can: result in delays in the retrieval of and dissemination of statistical data; impose restrictions on the accompaniment of transparent explanations of methodology with the data; violate the integrity of statistical information; and, very importantly, endanger the statistical agencies’ ability to follow through on their pledges of confidentiality and non-disclosure. These potential effects, in turn, can decrease federal statistics users’ access to the data, or their degree of trust in its accuracy. Accordingly, we believe it would be worthwhile to *specify* information technology systems among those things that should not be allowed to affect the autonomy of federal statistical agencies.

2. There is no mention of archiving data (for time series analysis or historical research) in proposed Responsibility #1. Regular archiving is valuable to today’s federal statistics users, as well as those in the future. Specific recommendations for archiving are found on page 57 of the (5th edition) *Principles and Practices*. Might there be a mention of this responsibility in the Proposed Statistical Directive?

Thank you for taking our suggestions into consideration as the Directive is finalized.

Sincerely,

KATHERINE R. SMITH
Executive Director