

*Committee on Population Statistics
Population Association of America*

October 1, 2007

Katherine K. Wallman
Chief Statistician
Office of Management and Budget
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Washington, DC 20503
Via e-mail: DisseminationDirective@omb.eop.gov

Dear Dr. Wallman:

The Committee on Population Statistics (COPS) of the Population Association of America (PAA), a committee appointed by the PAA President to advise the organization on technical statistical issues, would like to respond to the Federal Register Notice of August 1, 2007 entitled “Statistical Policy Directive: Release and Dissemination of Statistical Products Produced by the Federal Statistical Agencies.” As requested in the Notice, our comments focus on the desirability of issuing the proposed directive and suggestions to improve its effectiveness.

Desirability of the Directive

1. In an era when privacy concerns have been heightened and survey response has become more problematic, the Committee believes that the Office of Management and Budget (OMB) must do everything possible to ensure the integrity and equitable distribution of data disseminated by Federal agencies. Any breach of trust in the integrity and policy-neutral nature of Federal data products can compromise the very data collection activities that serve as the foundation for those products, leading to a downward spiral whereby the data themselves are compromised.
2. Guidelines for dissemination practices exist, but their applicability has been limited in scope. Applications of the “Principles and Practices for Federal Statistical Agencies,” published by the National Research Council in 2005 and OMB Statistical Policy Directive No. 3 on practices related to principal economic indicators, have been narrowly applied. The Committee believes that extending such practices to cover a larger set of Federal statistical products, as recommended by the Government Accountability Office 2006 report on Data Quality and as encompassed by the proposed directive, is worthwhile.
3. The Committee feels that the proposed directive strikes a good balance between agency autonomy regarding dissemination decisions and the application of standards for that dissemination. For example, the statement that “Agencies should assess the needs of data users and provide a range of products to address those needs by whatever means practicable,” does provide agencies with the ability to customize their programs to address user needs. At the same time, our Committee applauds the establishment of requirements and standards for data products; for example, “These products shall contain

or reference appropriate information on the sources, methodologies and limitations of the data as well as other information ...” (page 42268; second column).

Suggestions to Improve Clarity

1. Access to microdata is essential to demographic researchers in general and to the members of the PAA in particular. Continued access provides the research community with the capacity to analyze the data in unique ways; such flexibility cannot be found in other data products. The directive should emphasize that an agency’s responsibility to maintain confidentiality must be balanced by a willingness to facilitate research through the distribution of relevant microdata products. These two ideas come together on page 42268, section 6, third column, the second line up from bottom. Please consider the following word change that serves to better link the two ideas just described.

Existing wording: “When appropriate to facilitate in-depth research, and feasible in the presence of resource constraints, statistical agencies should provide public access to microdata files with secure safeguards to protect the confidentiality of individually-identifiable responses and with readily accessible documentation, metadata, or other means to facilitate user access to and manipulation of the data.”

Suggested alternative: “*At the same time*, when appropriate to facilitate in-depth research, and feasible in the presence of resource constraints, statistical agencies should provide public access to microdata files with secure safeguards to protect the confidentiality of individually- identifiable responses and with readily accessible documentation, metadata, or other means to facilitate user access to and manipulation of the data.”

2. A key aspect of this directive is ensuring that the policy-neutral stance of statistical agencies in the release of products is maintained; the appropriate review of press releases to guarantee this outcome is very important. Given the potentially broad scope of a new directive, it may not be possible to specify *which* “policy officials” are to be involved in review and clearance. However, we suggest that more exact language be incorporated to define the role of these “policy officials.” Please consider the following change on page 42269, section 6a, first column, last line of first paragraph:

Existing Wording: “Accordingly, these policy officials may issue separate independent statements on the data being released by the statistical agency, and these officials may review the draft statistical press release to ensure that it does not include policy pronouncements.”

Suggested alternative: “Accordingly, these policy officials may issue separate independent statements on the data being released by the statistical agency, and these officials may review the draft statistical press release *for the sole purpose of ensuring that it is policy neutral.*”

Thank you for providing the public an opportunity to review and comment on this proposed policy directive. If you have any questions, please do not hesitate to contact me in my role as Chair of COPS at jpassel@pewhispanic.org or (202) 419-3625.

Sincerely,

[signed]

Dr. Jeffrey Passel, Chair
PAA Committee on Population Statistics

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