

Perspective on OMB Statistical Policy Directives

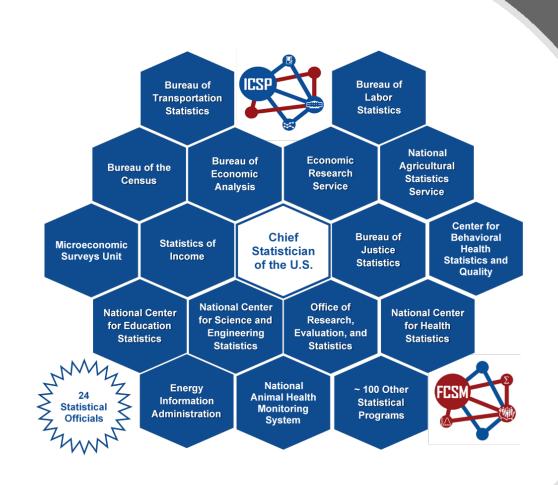
Kerrie Leslie, Senior Statistician
Office of Management and Budget

#CSOTUS

U.S. Federal Statistical System

Decentralized:

- Chief Statistician of the United States (CSOTUS)
- 16 Recognized Statistical Agencies and Units
- ~ 100 Other Statistical Programs
- 24 Statistical Officials
- Interagency Council on Statistical Policy (ICSP)
- Federal Committee on Statistical Methodology (FCSM)



See: StatsPolicy.Gov

Chief Statistician of the United States

- Provides leadership, coordination, and oversight
- Issues Statistical Policy
 Directives and guidance,
 including statistical
 standards and classification
- Chairs ICSP
- Engages with the international statistical community



See: StatsPolicy.Gov

Select OMB Regulations and Policies

Statistical Policy Directives:

- No. 1: Fundamental Responsibilities of Federal Statistical Agencies and Recognized Statistical Units
- No. 2: Standards and Guidelines for Statistical Surveys
- No. 2 Addendum: Standards and Guidelines for Cognitive Interviews

Regulations:

 "Trust" – Fundamental Responsibilities of Statistical Agencies and Units

OMB Statistical Policy Directive No. 1

- Issued 2014
- Fundamental Responsibilities:
 - 1. Relevant and Timely
 - 2. Credible and Accurate
 - 3. Objective
 - 4. Confidentiality & Exclusive Statistical Use



OMB Statistical Policy Directive No. 2

- Issued 2006
- 20 statistical standards
 - Applicable to censuses and surveys
 - to ensure consistency among and within statistical activities conducted across the Federal Government
- "Standards for Federal statistical programs serve both the interests of the public and the needs of the government."

OFFICE OF MANAGEMENT AND BUDGET
STANDARDS AND GUIDELINES FOR STATISTICAL SURVEYS
September 2006

OMB Statistical Policy Directive No. 2

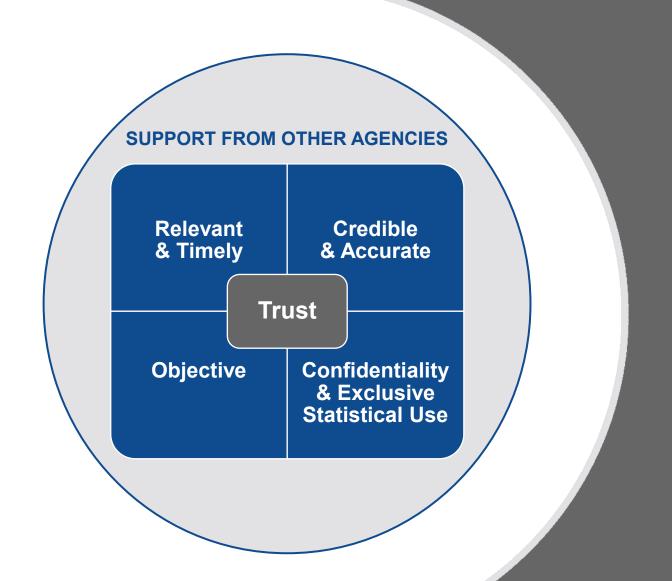
Addendum issued 2016

7 standards for cognitive interviews

 Cognitive interview studies investigate how survey questions perform when asked of respondents



- Required by Evidence Act
- Notice of Proposed Rulemaking (NPRM) - August 2023
 - Final regulation forthcoming
- Aligns with Directive No. 1
 - 4 fundamental responsibilities
 - Requirements for other agencies to enable, support, facilitate
 - Additional provisions



- CNSTAT, Principles and Practices for a Federal Statistical Agency
- Eurostat, European Statistics Code of Practice
- UN, Fundamental Principles of Official Statistics
- **OECD**, Principles and Practices for International Statistics

Ex: OMB Directive No. 1 <> UN FPOS

OMB Dir. No. 1 & Trust Reg:

- Relevant and Timely Statistical information should be timely & relevant to meet needs of policymakers and the public
- Credible and Accurate Statistical methods should be clear and open to scrutiny

UN FPOS:

 Relevance – Provide data and stewardship services to guide users to information they need

- Use of Sound Methods Use sound methods and tools, maintaining statistical integrity
- Transparency Work in a transparent manner, providing details on quality of the data and methods used

Ex: OMB Directive No. 1 <> UN FPOS

OMB Dir. No. 1 & Trust Reg:

 Objective - Statistics should be produced without bias or undue influence

 Confidential - Sensitive and confidential data should be protected and used only for statistical purposes

UN FPOS:

- Professional Independence –
 Maintain professional independence, while also collaborating for a better data ecosystem
- Privacy and Confidentiality –
 Maintain the trust of citizens, by fulfilling the mandate of privacy and confidentiality

ASA Ethical Guidelines

8 Guidelines focus on individuals & relevant to organizations

 Appendix outlines the responsibilities of organizations, including some directed for supervisors/leadership

ASA Ethical Guidelines

- Audiences slightly different:
 - OMB U.S. Federal government statistical agencies and units, including leadership and staff
 - ASA all statistical practitioners
- Park and Tractenberg (2023) note much alignment, some tensions, and some gaps

- ASA Ethical Guidelines
 - Focusing today on tensions/gaps with Directive No. 1 & Trust Regulation
 - Consideration: stat agencies and units sit within political structure – not independent – so...
 - How to balance different responsibilities appropriately?
 - How to promote sufficient alignment with technical guidance?
 - When to develop policies or promulgate regulations?

ASA Ethical Guidelines

- Relevance & Timeliness:
 - Balance needs of policy officials (they have the data they need to inform decisions) with support of stat practitioners doing their work with rigor
- Confidentiality & Exclusive Statistical Use
 - Balance providing useful data (by region/demographic characteristic/etc.) without disclosing the individual/business
 - In world of more data available, how to manage risk of re-identification

Questions?

Kerrie Leslie

Office of the Chief Statistician of the United States
Office of Management and Budget

- (e) kerrie.l.leslie@omb.eop.gov
- (w) CSOTUS | FSS | FCSM