

COMMITTEE ON NATIONAL STATISTICS

Principles and Practices for a Federal Statistical Agency— Perspectives vis-à-vis the ASA Ethical Guidelines

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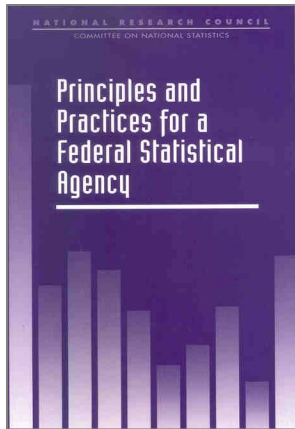
FCSM Research and Policy Conference
Session D-4: How Can U.S. Professional Guidelines
Inform Federal Statistical Policy?
October 25, 2023, College Park, MD

OUTLINE—

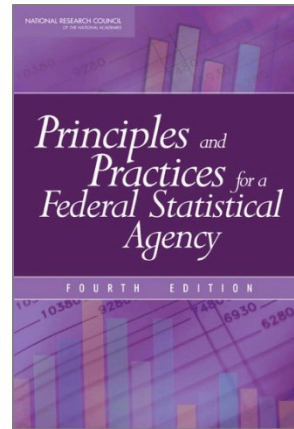
1. Overview of *P&P* – origins, content
2. Overlap with *ASA Ethical Guidelines for Statistical Practice* (2022)
3. Focus on tensions among Relevance, Independence, and Ethical Decisionmaking—three examples
 - Why doesn't the census ask about religion?
 - Why should excluding the question of citizenship on the census be a no-brainer?
 - Administrative records for the census—some records could help coverage, but???
4. 8th edition of *P&P* (2025) will hopefully sharpen/clarify the issues

“P&P” EDITIONS—8th EDITION FORTHCOMING IN 2025

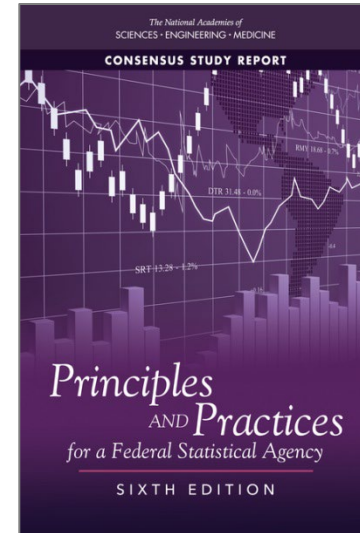
1992 — 27 pp.



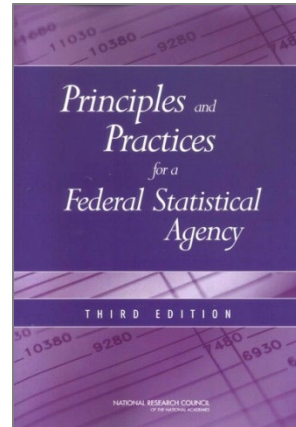
2009 — 123 pp.



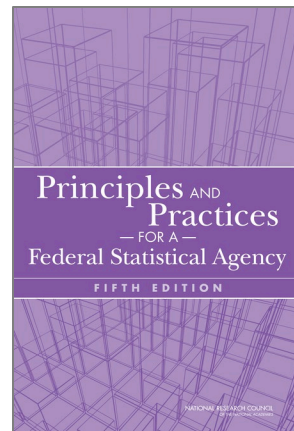
2017 — 156 pp.



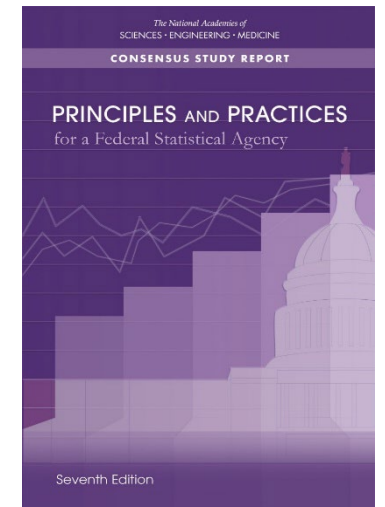
2005 — 66 pp.



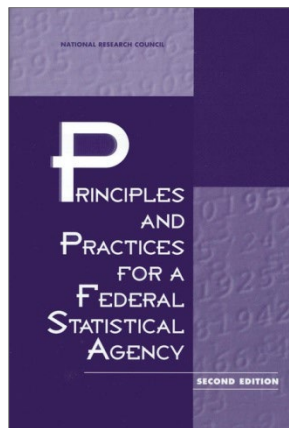
2013 — 166 pp.



2021 — 136 pp.



2001 — 44 pp.



ORIGINS OF THE FIRST EDITION (1992)

- Congressional staff and cabinet departments inquired about what constitutes an effective statistical agency
- Statistical agencies are sometimes confronted with inappropriate requests for confidential information or to put a policy spin on press releases of data
- Statistical agencies in our decentralized system must operate under policies and guidance of many departments and congressional committees, and not all officials are knowledgeable about proper practices for federal statistics
- Objectivity has been threatened at various agencies at various times
- At same time, Europe working on fundamental principles for national statistical offices (now a UN document—*Fundamental Principles for Official Statistics*) to help new former Soviet states establish credible statistical offices

PRINCIPLES

PRINCIPLE 1: RELEVANCE TO POLICY ISSUES AND SOCIETY—*Federal statistical agencies must provide objective, accurate, and timely information that is relevant to important public policy issues.*

PRINCIPLE 2: CREDIBILITY AMONG DATA USERS AND STAKEHOLDERS

PRINCIPLE 3: TRUST AMONG THE PUBLIC AND DATA PROVIDERS

PRINCIPLE 4: INDEPENDENCE FROM POLITICAL AND OTHER UNDUE EXTERNAL INFLUENCE—*in developing, producing, and disseminating statistics.*

PRINCIPLE 5: CONTINUAL IMPROVEMENT AND INNOVATION—*in processes, methods, and statistical products to better measure an ever-changing world.*

PRACTICES

1. A Clearly Defined and Well-Accepted Mission
2. Necessary Authority and Procedures to Protect Independence
3. Commitment to Quality and Professional Standards of Practice
4. Professional Advancement of Staff
5. An Active Research Program
6. Strong Internal and External Evaluation Processes for an Agency's Statistical Programs
7. Coordination and Collaboration with Other Statistical Agencies
8. Respect for Data Providers and Protection of Their Data
9. Dissemination of Statistical Products that Meet Users' Needs
10. Openness about Sources and Limitations of the Data Provided

APPENDICES

- Appendix A. Legislation and Regulations That Govern Federal Statistics
 - Appendix B. Organization of the Federal Statistical System
 - Appendix C. Some International Frameworks Relevant for U.S. Federal Statistics
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STATUTE

- **OMB—Statistical Policy Directives, Trust Regulation**
- **GAO—Agency Evaluations**
- **ASA—Papers on Statistical Agency Autonomy et al.**
- **Confirmation Hearings**

OVERLAP OF *P&P* WITH ASA ETHICS

- Honored to be asked to review draft of Park and Tractenberg (2023)
- Pleased that *P&P* generally received high marks for coherence with ASA Ethics
- Initially taken aback at their assessment of tension between *P&P* “relevance” (principle 1) and ASA ethical guidelines, particularly A (accountability) & D (data providers)
- Realized that a relevant data need could be unethical in one or more respects

DILEMMA—RELEVANCE VS. INDEPENDENCE VS. ETHICS

- Appropriate for public and policymakers to set priorities and content agenda for statistical agencies, so long as there is not political pressure for a nakedly partisan agenda
- Up to statistical agency to balance = stand up to political interference but not stand aloof from user/policymaker needs
- BUT—even a nonpartisan content agenda may raise ethical questions for statistical agency staff and leadership

EXAMPLE 1 - RELIGION

- The decennial census has never asked people directly about their religion (illegal since 1976—did count churches in 1850-1890 censuses and special 1906 census)
- No questions on individual religious identity in Census Bureau surveys either (have asked about attending services and the like)
- Included a question on March 1957 CPS but only published basic counts and did not include in 1960 census—outcry from many religious groups
- Many countries ask about religion in their censuses, but US has separation of church and state

[Why the U.S. census doesn't ask Americans about their religion | Pew Research Center](#)

EXAMPLE 2 – CITIZENSHIP ON THE 2020 CENSUS

Secretary of Commerce decision to include citizenship question clearly met “nakedly partisan agenda” criterion—

. . . citizenship is an important public policy topic and worthy of high-quality data collection, and this is already being accomplished through the ACS. The addition of the citizenship question to the 2020 decennial census questionnaire . . . does not demonstrate practical utility as required by the Paperwork Reduction Act, and the use of the census data to seed a “statistical reference list” raises concerns about whether the intended uses comport with the mission of a federal statistical agency. The late-stage insertion of a new and untested question in the 2020 census would almost certainly have damaging effects on the 2020 decennial census.

National Academies of Sciences, Engineering, and Medicine. 2018. *Letter Report on the 2020 Census*. CNSTAT Task Force on the 2020 Census.

EXAMPLE 3 – ADMINISTRATIVE RECORDS & THE CENSUS

- Brown et al. (2023) conducted a “*Real-Time 2020 Administrative Records Census Simulation*” to determine quality and timeliness of an “AR Census”
- 31 types of records used—USCIS, ICE, CBP, State Department, state welfare program, and state motor vehicle department records, obtained consequent to an executive order, contributed to more complete count of non-U.S. citizens
- AR census national population estimate 1.1% higher than DA high estimate and 2.3% higher than 2020 count
- Authors recommend renewing agreements with, e.g., ICE/CBP, BUT
????

8TH EDITION OF *P&P* (2025)

- I hope CNSTAT will consider adding language to 8th edition of *P&P* to emphasize importance of individual ethics training for statistical agency staff and leadership
- It is on the shoulders of the staff and leadership (as Hermann Habermann and Tom Louis have emphasized) to make tough decisions and pick necessary battles to protect the integrity of their agency and serve the public good
- The *ASA Ethical Guidelines* are a key document to that end

Thank You!

CNSTAT Website

<http://www.nationalacademies.org/cnstat>

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<http://www.nap.edu>