Dear Ms. Wallman,

Thank you for requesting comments on the 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. We pleased to provide our comments on behalf of the over 3,000 members of the Population Association of America (PAA) (www.popassoc.org) and almost 40 population research centers comprising the Association of Population Centers (www.popcenters.org) nationwide.

PAA and APC members, primarily demographers, sociologists, economists and statisticians, rely on data produced by the federal statistical agencies to conduct their research, produce scientific findings, train undergraduate and graduate students, and develop policy recommendations. As a result, our organizations fully support the mission of the federal statistical agencies, advocating not only for their sufficient funding, but also for their necessary autonomy. Therefore, we endorse the proposed Federal Statistical Policy Directive. In particular, we are pleased that the directive incorporates the National Academy of Sciences’ *Principles and Practices for a Federal Statistical Agency*, providing a “unified articulation of Federal statistical agency responsibilities.” By doing so, the directive will enhance the integrity and independence of the federal statistical agencies and the data that they produce. Nonetheless, we would like to comment on several aspects of the directive.

1) We wish to underscore comments made by the Council of Professional Associations on Federal Statistics (COPAFS) regarding data archiving. As the pressure to comprehend and manage “big data” builds, it is imperative for the federal statistical agencies to assume a leadership role. The directive is an ideal opportunity to clarify the agencies’ roles and responsibilities regarding data collection and archiving. We join COPAFS in urging OMB to consider incorporating data archiving recommendations stipulated in the 5th edition of the *Principles and Practices for a Federal Statistical Agency* into the directive’s final version.

2) We are pleased the directive states “coordination among statistical agencies within countries is essential to achieve consistency and efficiency in the statistical system.” We believe that the directive should serve as a platform for addressing how enhanced coordination among the federal statistical agencies could be achieved. At the 2014 PAA meeting in Boston, members of the PAA

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Committee on Population Statistics (COPS) informally discussed a number of innovative approaches for encouraging greater coordination among the federal statistical agencies, which could also strengthen their collective authority. We would like to suggest discussing these ideas in greater detail with OMB officials when COPS meets later this year in Washington, DC.

Thank you for considering our comments on the proposed directive. If you need additional information, please do not hesitate to contact the PAA Office of Government and Public Affairs at paaapc@crosslink.net.

Best Regards,

Robert Moffit

Lisa Berkman
2014 PAA President
2014-2016 APC President