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July 28, 2021

The White House
Office of Science and Technology Policy
1600 Pennsylvania NW
Washington, DC 20500

Sent via email to: ScientificIntegrityRFI@ostp.eop.gov

To whom it may concern,

On behalf of the members of the organizations we lead, the Population Association of America and Association of Population Centers, we are pleased to submit comments in response to a Request for Information (RFI) issued by the Office of Science and Technology (OSTP), “To Improve Federal Scientific Integrity Policies.”

The PAA and APC are two affiliated organizations that together represent more than 3,000 scientists working in the population sciences, an interdisciplinary field that includes demographers, sociologists, economists, and statisticians. Population scientists study the causes and consequences of population change. The APC is comprised of the over 40 federally supported population research centers based nationwide at universities and private research institutions. Population scientists have made groundbreaking and meaningful contributions on a wide array of topics relevant to society, including the social determinants of health and mortality, child and adolescent development, aging, migration, fertility, economic well-being, education, retirement, and post-disaster resiliency. Our members rely on competitive funding from the National Institutes of Health (NIH) and National Science Foundation (NSF) and data produced and disseminated by the federal statistical agencies to conduct their scientific and applied research and research training activities.

The RFI seeks input to “help improve the effectiveness of Federal scientific integrity policies to enhance public trust in science” in support of the President’s Memorandum on Restoring Trust in Government Through Scientific Integrity and Evidence-Based Policymaking. We appreciate OSTP’s leadership and the initiative that the Biden Administration is taking to: promote public trust in Federal scientific agencies; improve the communication of scientific and technological information; encourage adoption of effective policies and practices; and enhance support for the scientific workforce. We hope that our comments inform the important work that OSTP and National Science and Technology Council interagency working group will be conducting to meet the objectives of the President’s Executive Order.

Politization of Scientific Agencies

In recent years, our organizations have strongly opposed efforts to install partisan appointees at scientific and statistical agencies. For example, when the Trump Administration appointed three political appointees in the office of the Census Bureau Director, our organizations [expressed](#) strong concern. Scientific and statistical agencies should be led by objective, qualified experts. We urge the working group to reiterate the need for Federal scientific and statistical agencies to be led by individuals who have the appropriate credentials to advance their agencies' missions. Having trustworthy, nonpartisan leadership at the helm of these agencies is essential for securing the public's trust and maintaining their credibility.

Affirm Principles of Scientific Peer Review

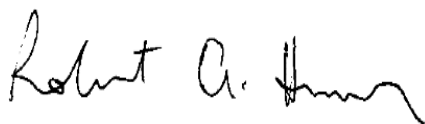
We encourage the working group to use this exercise as an opportunity to reaffirm the Administration's support of the NIH and NSF peer review processes. The peer review processes that the NIH and NSF employ for selecting the most meritorious research applications are recognized as the "gold standard" for determining the allocation of precious Federal research dollars. The peer review processes that these agencies use to rank and award research funding should be identified as "best practices" and reaffirmed as a model framework for ensuring that only the very best, innovative science is supported.

Embrace Principles and Practices of Federal Statistical Agencies

In March 2021, the National Academies Press of the National Academy of Sciences, Engineering, and Medicine (NASEM) published the [7th edition](#) of the "Principles and Practices for a Federal Statistical Agency." This consensus study report "offers five refined and updated principles for statistical agencies, such as public trust, credibility, independence from undue influence, and innovation — as well as 10 practices to help agencies fulfill the principles." The report, which was written by objective NASEM experts, and reviewed by outside stakeholders, provides numerous recommendations regarding how Federal statistical agencies should be managed to deliver accurate, timely, and relevant information for public and policy use. We think the recommendations in this report are very useful and hope that the members of the working group will identify them as "best practices."

Once again, thank you for seeking input from the scientific community. We appreciate your consideration of our views and hope you will contact us if our organizations can be a resource to you during the working group's deliberations.

Sincerely,



Dr. Robert Hummer
President
Population Association of America



Dr. Sara R. Curran
President
Association of Population Centers