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Sent via email to: Trust.Regulation@omb.eop.gov

To whom it may concern:

On behalf of the organizations we represent, the Population Association of America (PAA) and Association of Population Centers (APC), we are pleased to submit comments in response to “Fundamental Responsibilities of Recognized Statistical Agencies and Units,” a proposed rule from the Office of Management and Budget (OMB) also known as the Trust Regulation.

As you may know, PAA and APC are two affiliated organizations that together represent over 3,000 social and behavioral scientists and the over 40 population research centers that receive federal funding and conduct research on the implications of population change. Our members, which include demographers, economists, sociologists, and epidemiologists, conduct scientific and applied research, analyze changing demographic and socio-economic trends, develop policy and planning recommendations, and train undergraduate and graduate students. Their research expertise covers a wide range of issues, including adolescent health and development, aging, health disparities, immigration and migration, marriage and divorce, education, social networks, housing, retirement, and labor.

Population scientists, regardless of their expertise, rely on data produced and disseminated by the Federal statistical agencies and units to inform their research and research training activities. Therefore, our organizations are eager to respond to opportunities and initiatives that potentially could enhance the status and authority of the Federal statistical system.

As the first of three regulations required under the Foundations for Evidence-Based Policymaking Act of 2018, the Trust Regulation is intended to promote trust in Federal statistics and the statistical agencies that produce them. PAA and APC strongly endorse the regulation’s overarching objectives and objective to codify and clarify four long-standing responsibilities of statistical agencies: (1) to produce and disseminate relevant and timely statistical information; (2) to conduct credible and accurate statistical activities; (3) to conduct objective statistical activities; and (4) to protect the trust of information providers by ensuring the confidentiality and exclusive statistical use of their responses.

In addition, our organizations support provisions in the regulation that, we believe, would strengthen statistical agencies by enhancing their ability to manage their resources, personnel, operations, and data products. For example,

sections 1321.4(c)(1) and § 1321.4(c)(2) provide an elevated role for statistical agencies in developing, presenting, and defending their annual budget requests to OMB officials—steps that our organizations believe will empower statistical agencies and improve their ability to secure sufficient resources. Another provision, section 1321.4(b), allows “each Recognized Statistical Agency or Unit to maintain a distinctive, outward-facing website ^[49] with its own domain name and with adequate control over the website content and management to uphold the fundamental responsibilities.” We support this provision. However, we recommend expanding it to cover all reports and data products that statistical agencies or units generate.

In addition to broadening the authority of statistical agencies and units, we are pleased that the proposed regulation encourages statistical agencies to work with their parent agencies to improve the development and delivery of data products. Under Section 1321.5(b)(1)(i) in Relevance and Timeliness, the regulation specifies that statistical agencies must “consult with parent agency officials to assess and seek improvements to the relevance of its statistical products to users’ needs and to inform what statistical products to produce and disseminate.” We hope the regulation is revised to include outreach to Congress and other parts of the Executive Branch given they are also important stakeholders.

Thank you for considering our comments and please do not hesitate to contact us if we provide additional information.

Sincerely,



Dr. Lisa Berkman
2023 PAA President



Dr. Jennie Brand
2023-2024 APC President