

Howard J. Silver, Ph. D.  
Executive Director

August 10, 2001

Ms. Brooke Dickson  
Office of Information and Regulatory Affairs  
Office of Management and Budget  
Washington, DC 20503

Dear Ms. Dickson:

I am writing to communicate the views of the Consortium of Social Associations (COSSA) on the proposed guidelines for implementing Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001 (P.L. 106-554) published in the *Federal Register* on the June 28, 2001. Section 515 requires the Office of Management and Budget (OMB) to issue government-wide guidelines that "provide policy and procedural guidance to Federal agencies for ensuring and maximizing the quality, objectivity, utility, and integrity of information (including statistical information) by Federal agencies."

COSSA is an advocacy group whose mission is to promote attention to and Federal funding for the social and behavioral sciences. We are supported by over 105 professional associations, scientific societies, universities and research institutes (see attached list). COSSA acts as a bridge between the academic research community and the Washington policymaking community.

COSSA is clearly committed to data quality and its members have worked with many agencies and the National Research Council's Committee on National Statistics to ensure that procedures are in place to meet that commitment. We applaud Congress and OMB's concern with this topic. COSSA believes in the dissemination of public information. In the 1980s we worked hard on increasing public access under the Paperwork Reduction Act (PRA), especially in light of attempts to hinder certain data collections. We believe the purpose of information dissemination by Federal agencies is to provide the public the knowledge that the government has derived, particularly from information collections such as scientifically conducted surveys and scientifically conducted experiments.

COSSA believes the agencies should have the flexibility to develop mechanisms for assuring data quality and most have already done so. We applaud the proposed guidelines for encouraging that flexibility. However, there are certain provisions of the proposed guidelines that raise a number of issues that cause concern.

- 1) COSSA is concerned that the proposed guidelines may cause delays or roadblocks to information dissemination. Allowing challenges to agency information releases based on a notion that the data are not "useful to all users" or that they are presented in an "unbiased manner" creates the opportunity for frivolous challenges based on ideology or policy disagreements, neither of which helps the cause of disseminating information to the public. What is "useful" to one person may be useless to another based on whether you agree or disagree with the information promulgated. Who decides whether there is "bias?" The PRA's notion of "practical utility," while not perfect, would be better here.
- 2) COSSA is concerned that the guidelines attention to scientific research is too stringent, and may be unnecessary. The peer or merit review process used by agencies conducting science provides sufficient safeguards to ensure the quality and integrity of the data. To require that information cannot be disseminated unless "the results are substantially reproducible upon independent analysis of the underlying data," diminishes the agency's ability to present to the public the knowledge it could use.

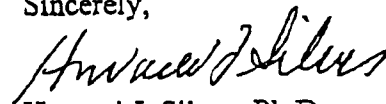
In addition -- Who will do these "independent" analyses? Will they be subject to the same peer or merit reviews that the original scientific research received? To ensure quality means not just for the product, but also for the processes that produce the product. Peer review does this for scientific research. What will do it for the "independent" analysis? If we are talking about checking arithmetic, that is one thing, but reproducing an entire analysis is another ballgame altogether. Also, are the agencies supposed to pay for it?

Furthermore, "underlying data" needs definition. Reference to the definition of data in Circular A-110 would be useful. The whole section referring to scientific information needs rethinking, if not outright elimination.

- 3) Finally, the reporting requirements for the agencies, particularly the annual report detailing the number, nature and resolution of complaints received by the agency raises questions about how these reports will be interpreted. Will agencies be penalized for a large number of complaints even though it may simply reflect the controversial nature of the agency's agenda? The guidelines should suggest that number of complaints does not necessarily correlate with failure to comply.

Thank you for your time and attention. If you have any questions or need more information, please let me know.

Sincerely,



Howard J. Silver, Ph.D.  
Executive Director

# CONSORTIUM OF SOCIAL SCIENCE ASSOCIATIONS

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American Anthropological Association  
American Economic Association  
American Historical Association  
American Political Science Association  
American Psychological Association  
American Society of Criminology  
American Sociological Association

American Statistical Association  
Association of American Geographers  
Association of American Law Schools  
Law and Society Association  
Linguistic Society of America  
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Society for Research in Child Development

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Society for the Scientific Study of Sex  
Southern Political Science Association  
Southern Sociological Society  
Sociologists for Women in Society  
Southwestern Social Science Association  
Urban Affairs Association

## CONTRIBUTORS

American Council of Learned Societies  
American Institutes for Research  
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