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October 23, 2023

Ms. Kerrie Leslie
Deputy Branch Chief & Senior Statistician
Office of the Chief Statistician
Office of Management and Budget
New Executive Office Building
Washington, DC 20503

Sent via email: www.regulations.gov

Dear Ms. Leslie,

On behalf of the members of the Population Association of America (PAA) and Association of Population Centers (APC), we are pleased to respond to the request from the Office of Management and Budget (OMB) for comments on Statistical Policy Directive No. 3: "Compilation, Release, and Evaluation of Principal Federal Economic Indicators (PFEIs)-Proposal To Change Timing of Public Comments by Employees of the Executive Branch" (88 FR 58316). The request specifically seeks comment "about the proposal to change the delay from one hour to thirty minutes, including whether such a change could still meet the goals of Directive No. 3 to ensure equitable, policy-neutral, and timely release and dissemination of PFEIs" and "whether to maintain the one-hour delay."

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. Data, including economic data, produced by the Federal statistical agencies, are used by population scientists universally to inform their research and research training activities.

PAA and APC are members of the broader community of scientific and professional associations committed to sustaining integrity and trust in the Federal statistical system. As such, our organizations strongly support policies

that reinforce the independence of Federal statistical agencies and empower them to collect and disseminate objective, accessible data.

The rationale for reducing the one-hour embargo for comments on the PFEIs is not apparent to our organizations. The current policy provides sufficient opportunity for policymakers and the media to receive and interpret these critical data. We are concerned that reducing the embargo time from one hour to 30 minutes increases the likelihood that misinterpreted data will be prematurely released, potentially misleading financial markets and analysts in the applied and academic sectors. The spread of misinformation could have even greater unintended consequences by eroding public trust in the Federal statistical system overall.

In sum, PAA and APC urge OMB to consider maintaining current policy, which prohibits employees of the Executive Branch from commenting publicly about the release of PFEIs at least one hour following the statistical release. In addition, we encourage OMB to engage more directly with data users about any changes to Statistical Policy Directive No. 3 before taking further action.

Thank you for considering our comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'L Berkman', with a long horizontal flourish extending to the right.

Dr. Lisa Berkman
2023 PAA President

A handwritten signature in black ink, appearing to read 'J Brand', with a large loop at the end.

Dr. Jennie Brand
2023-2024 APC President