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February 8, 2021

Office of the Under Secretary for Economic Affairs
Department of Commerce

1401 Constitution Ave NW

Washington, DC 20230

Sent via email: Evidence@bea.gov

To whom it may concern:

On behalf of the Population Association of America (PAA) and Association of Population Centers (APC), we are pleased to submit the following comments in response to Federal Register notice "Request for Comments for the Advisory Committee on Data for Evidence Building" (86 FR 5131).

PAA and APC are two affiliated organizations that together represent over 3,000 social and behavioral scientists, including demographers, sociologists, and economists who conduct research on the causes and consequences of population change. Our members, working in applied and academic sectors, conduct policy relevant research on a wide range of topics, such as mortality, fertility, adolescent health, population forecasting, immigration, and labor force dynamics. Recommendations issued by the Advisory Committee on Data for Evidence Building could potentially improve the ability of population scientists to access essential federal data and facilitate the translation of their research for use by policymakers. Therefore, we are pleased to respond to this opportunity to guide the advisory committee's work.

The notice asks respondents to address a series of questions. Questions regarding the creation of a National Secure Data Service (NSDS) and data confidentiality and accessibility are most pertinent to our organizations' interests. Population scientists have unique expertise in issues regarding data confidentiality and accessibility and appreciate the challenges that the advisory committee faces striking an appropriate balance.

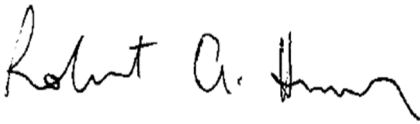
With respect to the NSDS, we wish to reiterate our support for its creation. However, we wish to make three recommendations concerning its operating principles. First, we feel strongly that NSDS success hinges on the participation of all federal agencies, including those, such as the National Center for Health Statistics, that have resisted efforts to participate fully in, for example, the Federal Statistical Research Data Centers (FSRDCs) in ways that would increase the discoverability and accessibility of NCHS data. PAA and APC encourage the advisory committee to explore the barriers that prevent all federal statistical agencies from fully participating in existing data enclaves to ensure the success of the NSDS.

Second, we think that is important and that every effort is made to ensure that the principles of reproducibility and assessment of the robustness of evidence are imbedded in the operational structure of the NSDS and the research it supports. The ability to perform such analyses is essential to determine if scientific and policy conclusions derived from these data are valid. To support this function, we urge the advisory committee to recommend that all data constructed by the NSDS be archived and made available to qualified researchers within the FSRDCs for the purposes of replication analyses.

Third, ensuring data confidentiality is also essential to the integrity of the NSDS. To this end, PAA and APC endorse the use and continuous improvement of firewalls that limit federal agencies from sharing data except for valid statistical purposes.

Thank you for considering our views. We hope the advisory committee will rely on experts within the population research community to inform its important work and recommendations.

Sincerely,

A handwritten signature in black ink, reading "Robert A. Hummer". The signature is fluid and cursive, with the first name being the most prominent.

Dr. Robert A. Hummer
President
Population Association of America

A handwritten signature in blue ink, reading "Sara R. Curran". The signature is fluid and cursive, with the first name being the most prominent.

Dr. Sara R. Curran
President
Association of Population Centers