



# American Statistical Association

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Ms. Brooke Dickson

Office of Information and Regulatory Affairs

Office of Management and Budget

Washington, DC 20503

Dear Ms. Dickson

We have asked some members of the American Statistical Association to review the "Proposed Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies." The following are our comments on the proposed guidelines:

1. More emphasis should be placed on providing documentation needed to correctly interpret and analyze information disseminated by Federal agencies. Documentation would help the user to place the data in their proper context.
2. Statements concerning data quality should be accompanied by information about the accuracy, reliability, and validity of the information being presented.

Data quality is a broad concept discussed in many books and articles in the statistical literature. Several statistical agencies are exemplars in developing data quality standards.

The American Statistical Association would be pleased to provide assistance to OMB in further developing these standards.

Sincerely yours,

Richard L. Scheaffer