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Topic – Managing Communication and Credibility

**A New Directive, a New Opportunity: How the OMB Directive
Expands Communication at the National Center for Health Statistics**
Submitted by U.S. National Center for Health Statistics¹

Abstract—The relationship among U.S. federal statistical agencies, their parent agencies, and the media has most recently evolved with the new Office of Management and Budget Statistical Policy Directive No. 4, in which procedures are “intended to ensure that statistical data releases adhere to data quality standards through equitable, policy-neutral, and timely release of information to the general public.” This new directive, which was initiated and drafted by statistical communicators at U.S. government agencies, will foster communication objectives at the National Center for Health Statistics.

Introduction

1. As the coordinator of the U.S. federal statistical system, the Office of Management and Budget (OMB) is required, among its many responsibilities, to “maximize the quality, objectivity, utility, and integrity of information, including statistical information, provided to the public.” Statistics are vital to policymakers and to the public in making decisions about which issues are critical and should demand resources. Federal statistical agencies are often sought out as objective sources of information because they are considered to be neutral as far as promoting certain agendas through the release of information. Any lapse in the integrity of the data that are disseminated from federal statistical agencies can result in a loss of trust from those who are in most need of the information.

2. The timing of a release and accompanying material can influence the way in which statistical information is interpreted. In March 2008, OMB issued Statistical Policy Directive No. 4, providing guidance to federal statistical agencies on the release and dissemination of statistical products. The directive encompasses the principles mentioned above and mandates that statistical agencies release statistics that are reliable, unbiased, and timely. The development of the directive was initiated by a team of public affairs specialists from most of the federal statistical agencies, and their ideals for fair and efficient information release are manifest throughout the final version of the directive. The directive enables federal statistical agencies, such as the National Center for Health Statistics (NCHS), to release information in a manner that avoids political pressure and organizational interest and that, ultimately, empowers the public.

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Background

A Growing Need

3. Maintaining public confidence in U.S. federal statistics is a long-standing concern. In the early 1960s, the President's Committee to Appraise Employment and Unemployment Statistics noted the need for a distinction to be made between the release of statistics (and the analysis of their results) and policy-oriented comments associated with the same issues. In 1971, the Nixon Administration came under fire for the manner with which it portrayed newly released unemployment data from the Bureau of Labor Statistics. In response, OMB issued Statistical Policy Directive No. 3, which was designed to ensure that the release of economic data was, among other things, timely, policy neutral, and free from interpretation by policy makers.

4. In the 1990s, the need to guarantee the public trust in federal statistical agencies was again addressed. During the reauthorization of the Paperwork Reduction Act in 1995, Congress reinforced OMB's responsibility to act as coordinator of the federal statistical system to secure the integrity of information collected for statistical purposes. Then, in 1996, the United States subscribed to the International Monetary Funds' Special Data Dissemination Standard (SDDS), which guides more than 60 nations in providing economic and financial data to the public. This standard highlighted the critical nature of ready and equal access to data as well as the importance of assisting users with assessing data quality by providing the appropriate details and documentation.

The Public Affairs Forum

5. During the late 1990s, the Public Affairs Forum for Federal Statistics was established, according to founding member Sandra Smith of NCHS, "to help public affairs specialists in the national statistical offices deal with common problems, learn from each other, advance the field, and contribute to better policies and practices in dissemination of statistics." Ultimately, the attention of the group turned to the involvement of higher level program and public affairs officials (above the statistical office) in the release of information. With the exception of economic statistical agencies, which were protected under the aforementioned OMB Statistical Policy Directive No. 3, social and demographic statistical agencies found themselves lacking authority to ensure that the release of statistical information was timely and done in a neutral manner.

6. The Public Affairs Forum soon initiated a small working group to draft a new directive; the group inquired into whether they would be supported by OMB and received a positive response from the agency. The group conferred with senior staff at statistical agencies, and progress reports were provided to these senior staff periodically at regular meetings of the Interagency Council on Statistical Policy. The group relied on the National Research Council's 2005 Principles and Practices for a Federal Statistical Agency and employed these principles throughout the directive. The drafting process was time-consuming and covered a period of approximately 5 years from the formation of the group to the issuance of the directive. The directive was much reviewed and was sent for comment to all of the relevant executive departments as well as the statistical agencies. In August 2007, OMB published a draft of the directive in the Federal Register, seeking comments from the public. All the respondents encouraged OMB to issue the directive, although several had suggestions to bolster various provisions of the directive. The OMB Statistical Policy Directive No. 4 was officially issued on March 7, 2008.

The Directive—What it Means to NCHS

7. In effect, OMB Statistical Policy Directive No. 4 mandates that the dissemination of federal statistical information be characterized by integrity, reliability, objectivity, and accessibility. The rationale behind the release of information based on these principles is to engender a greater response from survey respondents and to secure the best quality data for end users. Because federal policy and programs depend on neutral and timely statistics, the directive points to the high standards that must be maintained throughout the process of dissemination of these potentially influential products. This directive, in turn, offers opportunities for parent agencies to strengthen their own scientific credibility by supporting the timely and neutral release of federal statistics.

Scope and Definition

8. The new OMB directive clarifies that it applies to all statistical products disseminated by federal statistical agencies (excluding the Principal Federal Economic Indicators previously addressed in OMB Statistical Policy Directive No. 3). The directive emphasizes that statistical agencies are directly and exclusively responsible for the content they release and must also follow OMB standards and guidelines for statistical surveys. Statistical agencies, in brief, are defined as organizational units of the executive branch whose activities chiefly consist of collecting, processing, or analyzing information for statistical purposes. Statistical products refer to information products that are disseminated for the public use and include descriptions, analyses, estimates, and sometimes even forecasts of the characteristics of groups without identifying the individual components of those groups.

9. The provisions of these sections place a considerable responsibility on federal statistical agencies. While the directive gives NCHS and other statistical agencies sole responsibility for the timely release of data reports and products, that same responsibility is coupled with an accountability to adhere to the OMB's Information Quality Guidelines and Statistical Policy Directives. This OMB directive, by instilling responsibility in the statistical agency, also directs each agency to maintain the highest standards in its collection and analysis of data—a mandate NCHS followed well before the directive was issued and to which it continues to adhere.

Highlights

Statistical Press Releases

10. According to the new OMB directive, a “statistical press release” is an announcement to the media of the release of a statistical product from a statistical agency. The press release should include the name of the statistical agency as well as accessibility information for the newly released data. It should also include the subject matter and key findings shown in the statistical product—the purpose being that statistical agencies should be clear about their findings. Moreover, this press release must be produced and issued by the statistical agency itself.

11. NCHS is a part of the Centers for Disease Control and Prevention (CDC), which has broad responsibilities in public health within the Department of Health and Human Services (HHS). NCHS and other statistical agencies, through the directive, have been given responsibility for the final version of their press releases. The directive does allow statistical agencies to share information with their parent agencies so that they will be aware of the information to be released and be able to prepare a separate statement commenting on the data. In the past, the information that CDC sometimes added to an NCHS press release was helpful programmatic information such as public health and prevention guidelines and recommendations that could be useful to the public but that placed non-statistical information in the release. Now, NCHS's press releases are purely statistical

products; however, by sharing the press release, CDC and other parent agencies have an opportunity to release a separate statement or press release simultaneously that emphasizes the programmatic side of the data while keeping the statistics policy neutral.

Timing of Releases

12. The OMB directive gives federal statistical agencies sole responsibility for the timing of the release of statistical products. In fact, agencies are charged to minimize the interval between the period of time to which the data refer and the date when the product is actually released to the public. NCHS has been working closely with its parent agency CDC in order to inform them well ahead of time that a release is forthcoming. Under the provisions of the OMB directive, a federal statistical agency should not delay a release because the statistical product (which includes the press releases) has not been sanctioned by parent agencies. However, this issue can be complex and at times requires coordination with parent agencies.

Pre-Release and Embargo

13. The OMB directive addresses an important aspect of release that gives federal statistical agencies the opportunity to expand media outreach—that of the pre-release of products. Statistical agencies are granted permission to provide pre-release access to final statistical products (a product is considered final when it meets the agency’s data quality standards and does not require further changes). One of the methods that the directive describes is that of using an embargo, which means that pre-release access to a statistical product is provided but only with the agreement from the receiving party (the media, in most cases) that the information cannot be further disseminated or utilized for any purpose until an exact date and time.

14. Since the implementation of the directive, NCHS has extensively employed the embargo method. In practice, NCHS releases a press release and a copy of the final report to the media via an email media distribution list. Both in the email and on the final copy of the report, the embargo is explicitly stated (as mandated by the directive). The benefit of utilizing this pre-release method has been the ability to coordinate interviews and answer questions from the press prior to the report’s being widely released. This has resulted in extensive coverage of NCHS material by major media outlets and wire services.

Notification of Release

15. The OMB directive states that “prior to the beginning of the calendar year, the releasing statistical agency shall annually provide the public with a schedule of when each regular or recurring statistical product is expected to be released,” and this list is to be published on the agency’s website. This list must be updated and revised in a timely manner as changes are made. At the end of 2008, NCHS collected a list of upcoming reports from each of its programs and assembled a web version searchable by month, program, publication, and subject matter. The list is housed on the NCHS Press Room website, and future efforts will entail appropriately placing the page to ensure the list is easily accessible to all users.

Forum and Strategies for Information Release

16. The OMB directive encourages agencies to utilize a variety of forums and strategies to disseminate and promote their statistical products. Microdata files that support released reports should be made available when feasible—of course, this entails extra precaution in keeping any identifying information from surveys strictly confidential. Forums for promotion of statistical products can include conferences, exhibits, presentations, workshops, list serves, the Government

Printing Office, public libraries, and outreach to the media (such as news conferences, statistical press releases, and media briefings).

17. As described previously, NCHS utilizes press releases, the Internet, and pre-release methods to promote and disseminate its products to the widest possible audience. In addition, NCHS has employed a monthly media newsletter featuring upcoming reports and helpful information for finding data and recent releases on the NCHS website. Furthermore, the NCHS Office of Public Affairs has attended a small number of conferences each year with select audiences; the opportunity to speak to small audiences in person is a valuable method for promoting statistical information to target audiences who utilize the data and further disseminate it to the public.

Conclusion

18. The development of OMB Statistical Policy Directive No. 4 was initiated because statistical communicators at federal agencies were concerned about maintaining the integrity and objectivity of the statistical information their agencies collected and disseminated. Federal statistical agencies are fulfilling a public trust in regard to the information that is released—this trust engenders cooperation on future surveys and gives value to the information the agency disseminates. When policy pronouncements are included or timing is delayed for reasons unrelated to the data, the public loses trust not only in the products that have been released, but also in the agency responsible for that release. The OMB directive instructs statistical agencies such as NCHS to reach out to the public in a timely, equitable, and responsible manner, ultimately establishing a reputation of being an agency with high integrity.

19. The authority granted to statistical agencies by the OMB directive has been beneficial in improving the operation of the NCHS Office of Public Affairs. As described, this directive allows NCHS to take responsibility for its press releases, have control of the timing of a release and pre-release methods, and ultimately, reach its audience in the most timely, equitable, and objective manner. The challenge of the directive is in the implementation; NCHS is still in the process of working out the details with CDC because the directive represents a departure from previous practice and from CDC's public affairs guidelines. NCHS is committed to fulfilling the mandates within the OMB directive and preserving the longstanding dedication to the public. Because the OMB directive has the public interest at heart and federal agencies, statistical or not, are also dedicated to serving the public, the situation can ultimately be favorable for everyone involved.
