



American Economic Association

Committee on Economic Statistics: www.aeaweb.org/about-aea/committees/economic-statistics

Opportunities to Comment on Proposed Federal Data Collections: A Primer on How to Respond

Introduction

Economic data are the lifeblood of economic research. Economists' capacity to produce meaningful, reproducible, impactful analyses is very much a function of their access to current, reliable, detailed data. The most important source of research data is the Federal government, particularly its economic statistical agencies – including the Census Bureau, Bureau of Labor Statistics, and Bureau of Economic Analysis.

In the 1970s, Congress became concerned that U.S. households and businesses were being unnecessarily burdened by an uncoordinated array of survey instruments from multiple Federal agencies. In response, Congress passed the [Paperwork Reduction Act \(PRA\)](#), which requires every Federal data collection to be cleared by the White House Office of Management and Budget (OMB) before implementation. The PRA lays out the steps and timelines for a process by which Federal agencies submit "Information Collection Requests" (ICRs) to OMB, including two successive opportunities for public comment.

In the experience of AEA's Committee on Economic Statistics (AEAStat), focused, thoughtful, actionable comments on ICRs from AEA members can lead to better data, improved access, greater research opportunities, and more robust studies, as federal agencies are required to consider feedback on plans and may adjust them when important new concerns are raised. Positive feedback explaining the high value of a data collection is also helpful for making sure it continues. AEAStat provides this primer on the why, what, and how of public comment on proposed Federal data collections in the hope that it will motivate AEA members to inform statistical agencies and OMB about their views of current and proposed data collections and how they can be improved.

Why: Reasons to Provide Comments

Essentially, ICR comments are a means to address "information market failure" in the realm of economic statistics. Comments can:

- Increase Federal agency and OMB understanding of the uses and value of the data collection
- Prompt a Federal agency to improve a survey's sample design, questionnaire, data collection methods, disclosure avoidance methods, data products, or data accessibility for research
- Create avenues for the Federal agency to periodically consult with knowledgeable AEA members on contemplated revisions and adjustments

The ICR comment process is intended to be "market-perfecting:" by facilitating exchange of information between producers and consumers of Federal statistics, characteristics of the product can be improved, and returns on Federal investments in information collection can be maintained or increased. In terms of personal

cost-benefit, AEAStat's experience is that a relatively small investment of personal time and effort can yield substantial results for one's own research, research in the relevant field more broadly, and public policy.

What: The Nature of the ICR Process

To implement a data collection, a Federal agency must first submit an ICR to OMB and then receive approval as described in "terms of clearance." The ICR includes the data collection instrument(s), form letters to respondents, and a detailed Supporting Statement providing the justification for the data collection (Part A) and a description of statistical methods (Part B). OMB clearance for federal data collections is time-limited, typically three years, after which renewal must be sought. Any substantive change in a collection during the three-year period must be cleared by OMB.

The ICR process has two major steps, each with an opportunity for public comment:

- First, the agency announces in a [Federal Register](#) notice (FRN) that it intends to submit an ICR to OMB and gives the public 60 days to provide comments on the draft ICR. The FRN may flag issues for which comments are especially encouraged.
- After considering public comments, the agency prepares the ICR for formal submission to OMB.
 - The agency announces its submission in a second FRN and gives the public 30 days to provide comments to OMB.
 - OMB posts the full ICR, with all attachments, in the [Information Collection Review](#) section of its Reginfo.gov website.
 - The ICR includes a response to each submission received in the first comment period.
 - The ICR is assigned to the OMB desk officer for the submitting agency. The desk officer aims to publish a decision within 30 days of the close of the public comment period.

At a minimum, an agency must issue its first FRN 120 days before the expiration of the current clearance. Most agencies issue their first notice well in advance of that mark, often in the range of 150-180 days.

How: Guidance on Preparing Comments

AEA members are encouraged to comment on [any aspect](#) of the proposed data collection of interest or concern. Topics might include, for instance, needs and uses of the data, survey design, questionnaire wording, costs, schedule, or consultation with data users. Comment submissions may be of any length or format. AEAStat recommends that commenters use institutional letterhead when possible.

AEA members can consider framing their comments in any number of ways, such as:

- assessments – identifying what they do and do not like and support
- suggestions – for how the Federal agency might proceed in this or future collections
- requests – for example, for a change in the design of the survey instrument, to be consulted in the future, to carry out research on an alternative approach
- observations – for example, implications of the sample size for statistical reliability

An example of a reply to a request for comment can be found [here](#).

Conclusion

Economists work in an intense market environment in which they are rigorously judged by the contribution and quality of their research. [Improvements in the availability and accessibility of Federal data and statistics improve economic research](#). To that end, AEAStat strongly encourages AEA members to submit thoughtful, focused comments on Federal data collections in their realms of expertise.