

October 2, 2023



The Honorable Shalanda D. Young
Director, Office of Management and Budget
Executive Office of the President
725 Seventeenth Street NW
Washington, DC 20503

Submitted via <http://www.regulations.gov>

Re: Fundamental Responsibilities of Recognized Statistical Agencies and Units (Docket No. OMB–2023–0015)

Dear Director Young,

On behalf of The Leadership Conference on Civil and Human Rights, a coalition charged by its diverse membership of more than 240 national organizations to promote and protect the civil and human rights of all persons in the United States, we appreciate this opportunity to provide comments in response to the Office of Management and Budget’s (OMB) proposed regulations — published in the Federal Register on August 18, 2023 — aimed at promoting public trust in the agencies that produce Federal statistics. We support the goals of this proposed rule, as it is important to build trust in the work of these agencies while ensuring that they maintain independence and are as free from political interference as possible.

The proposed rule, “Fundamental Responsibilities of Recognized Statistical Agencies and Units,” is an important step toward cultivating public trust in the nation’s federal statistical agencies. The proposed regulations would improve the inclusivity and responsiveness of our administrative state, support the formulation of more effective policies, and strengthen public trust in our civic institutions. The reforms contained in the proposal have the potential to mitigate inequities in federal data and advance data justice.

We appreciate these strides toward addressing public trust, policy gaps, and shortcomings in data collections that affect some of our most vulnerable communities, such as people of color and people with disabilities. As part of bolstering public trust in statistical agencies, it is vital that these agencies maintain their independence, free from political interference.

Thank you for your consideration of our concerns and views. Please direct any questions about these comments to Meeta Anand, Senior Director, Census and Data Equity at The Leadership Conference (anand@civilrights.org).

Sincerely,

The Leadership Conference on Civil and Human Rights