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Subject:

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Comment

With regard to the proposed new rule under OMB Circular A-76 -- changing the default designation of government functions to commercial and requiring agencies to designate what is inherently governmental -- it is important to remember that in the areas of science and technology, it is the government's interest and investment in statistics and research on health, the economy, the social welfare (i.e. criminal justice and education), and technology that has advanced knowledge in these areas. When considering the appropriate role of the federal government in the generation and use of information from research and data, two perspectives are important: First, information is a public good (in the economic sense) and the sponsorship of research and data collection is a necessary government intervention. Second, the government function will ensure the relevance, accuracy, and timeliness of the information.

Maintaining the scientific integrity, quality, and long-term continuity of government statistics and research is essential for sound and effective public policy and practice in the United States across all of the major policy domains. The production and dissemination of the nation's statistics and research in these important areas must be free of political bias and control. Current procedures for the analysis, interpretation, and reporting of government statistics and research by the United States are widely recognized as exemplary and are emulated throughout the world. Maintaining the integrity, quality, and independence of this information is the responsibility of the government of the United States. If these functions are to be considered commercial by default, and can be designated inherently governmental only at the whim of whichever political administration happens to be in power, I believe that scientific progress, as well as the quality of science in the United States, which has been responsible for this nation's prominence as the most scientifically advanced in the history of the world, will be damaged. A clear and unequivocal exception should be made for research and statistics positions at all levels, not just supervisory or managerial levels.

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