American Statistical Association

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April 15, 2009

The Honorable Douglas Shulman
Commissioner, Internal Revenue Service
1111 Constitution Avenue, NW
Washington, DC 20224

Dear Commissioner Shulman:

I understand that you will soon need to appoint a director for the Statistics of Income (SOI) at the IRS. As President of the American Statistical Association, with its 18,000 members, I urge you to give serious consideration to individuals who have strong management and scientific skills; significant experience in SOI or another federal statistical agency; visibility in the statistical community; and an understanding of *The Confidentiality Information Protection and Statistical Efficiency Act of 2002* (CIPSEA) and the National Academies' *Principles and Practices for a Federal Statistical Agency.*

The recently-released fourth edition of the National Academies' *Principles and Practices for a Federal Statistical Agency* was endorsed by the ASA Board of Directors. This document lays out the principles required for an effective statistical program, the four principles being policy relevance, credibility among data users, trust among data providers, and a strong position of independence. I encourage you to review carefully *"Principles and Practices"* and to follow its guidance.

Statistics of Income is highly regarded for its first rate products, its professional staff and its ability to quickly produce reports in a rapidly changing environment. We believe that a director with the above qualities and adherence to the guidance of *Principles and Practices for a Federal Statistical Agency* will help to maintain SOI's high performance standards.

Thank you for your consideration.

Sincerely,

Sally C. Morton

Cc: James B. Mackie III, Director, Office of Tax Analysis, Department of Treasury; Mark Mazur, Director of Research, Analysis and Statistics, IRS