
THE GEORGE WASHINGTON UNIVERSITY

WASHINGTON, DC

January 3, 2017

Jennifer Jessup, Departmental Paperwork Clearance Officer
Department of Commerce, Room 6616
Washington, DC 20230

Via: jjessup@doc.gov

Re: State and Local Government Finance Collections (OMB Control Number 0607-0585)

Dear Ms. Jessup,

I am pleased to respond to the *Federal Register* notice of November 3, 2016 concerning the Census Bureau's plan to conduct the 2017 Census of Governments—Finance and the 2018 and 2019 Annual Surveys of State and Local Government Finances (FR Doc. 2016–26606).

On behalf of the American Economic Association's Committee on Economic Statistics, which I staff, I asked Joseph Cordes, George Washington University Professor of Economics, Public Policy and Public Administration, and International Affairs, for his views on the proposed State and Local Government Finance Collections. Prof. Cordes views these data collections as essential for public policy and economic research. He also asks the following question:

In the question and answer section of the survey that is provided to responders, the responder is asked to provide the requested financial information, rather than being asked to submit their own financial statements (CAFRs...Consolidated Annual Financial Report). Respondents do, however, seem to have the option of simply submitting a copy of the CAFR. This procedure raises the possibility that the data that are recorded for the various local governments may not be entirely consistent with each other. How serious of a problem is this when one seeks to make cross-sectional comparisons?

Prof. Cordes and I would appreciate receiving the Census Bureau's answer to this question. In addition, in light of Prof. Cordes' observation, I request that the Census Bureau add a reference document to its [State and Local Government Finance](#) webpage that provides a full discussion of any limitations of the data for the purposes of economic research.

Thank you for the opportunity to comment on the proposed 2017-19 State and Local Government Finance Collections. I hope that our comments have been useful and look forward to reading your submission to OMB.

Sincerely,



Andrew Reamer
Research Professor