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Discussion of "Bayesian Models and Methods in Public Policy and Government Settings" by S. E. Fienberg

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Steve Fienberg has presented a wide and interesting range of applications of Bayesian methods in public policy and government settings (including election night forecasting which I might prefer to classify as fleeting public entertainment!). The examples exhibit the common feature that they all involve highly complex problems that are difficult to handle in a non-Bayesian framework. Sedransk (2008) has provided some other examples of Bayesian methods in such settings which also share this feature. I am sympathetic to the use of Bayesian methods in such special circumstances, as illustrated below.

My initial comments focus on the choice of modes of inference for large-scale government surveys, particularly surveys of households and persons, that are the backbone for satisfying policy and government data needs. An important feature of these surveys, in common with most surveys, is that they typically collect data on many variables and these data are then used to produce very large numbers of estimates. In this area, I generally favor the frequentist repeated sampling mode of inference, commonly termed designbased inference (Kalton, 2002), and I believe that my views are in line with most other survey statisticians (see, e.g., Rao, 2011, in this issue). However, there are situations in which design-based inference cannot satisfy analytic objectives. Also, limitations in the practical application of design-based inference are becoming increasingly troublesome. To the extent possible, I prefer to minimize the dependence of survey estimates on statistical models. When models are needed, I prefer non-Bayesian models to Bayesian models, but I accept that Bayesian models have major analytic attractions for some complex analytic problems. My chosen focus excludes discussion of applications of what are often termed "the analytic uses of survey data." For example,

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when a survey collects data for a non-randomized observational study, models are clearly essential to evaluate the effects of different levels of program exposure; this kind of modeling is outside my current scope.

To start, consider the ideal situation of a survey that uses a sampling frame with complete coverage of the finite target population, that achieves complete response from all sampled elements, and that has a sample size chosen to be large enough to produce designbased estimates of adequate precision for prespecified policy needs. In such a case, the design-based approach has major attractions for a typical survey, especially in view of the multipurpose nature of surveys which aim to produce a multitude of descriptive estimates. Under this mode of inference, the survey estimates are not model-dependent. To expand on George Box's often quoted saying "All models are wrong, but some are useful," I would add the caution for the survey context that "Models are not always useful." Models need to be carefully developed and tested if modeldependent inference is to be used, particularly with large-scale surveys. With a small sample, a modeldependent estimate may be preferred because its mean squared error (MSE) is less than the large variance of the design-based estimate; however, with a large sample, the bias associated with the model-dependent estimate becomes the dominant factor in the MSE. Besides the precision of the estimates, another important attribute of quality in government statistics is the timeliness with which the estimates are produced. All the many design-based estimates from a survey can be produced relatively quickly since they do not require the time needed to develop and test many models. Also, the design-based approach has the flexibility of readily permitting the computation of additional estimates if the initial findings indicate they may be of interest.

Although design-based estimates are not dependent on the validity of statistical models, models do play important roles in survey sample design and analysis. Implicit and explicit models have been involved in sample design since the early days including, for instance, in 232 G. KALTON

stratification and the choice of the clusters at various stages of sampling (see Sedransk, 2008, for a discussion of Bayesian models in design). Also, models have long been used in analysis, through such techniques as poststratification, and ratio and regression estimation. The distinctive feature of the use of such models in design-based inference is that the sample estimates are approximately unbiased irrespective of the suitability of the models. The choice of model affects only the precision of the survey estimates. Särndal, Swensson and Wretman (1992) conveyed this meaning by titling their book "Model Assisted Survey Sampling." The aim of sample design is to develop efficient model-assisted estimates in order to avoid the need for model-dependent estimates.

The ideal situation described above is unfortunately seldom encountered in survey practice: the sampling frame rarely provides complete coverage of the target population and nonresponse—both unit (total) and item nonresponse—is almost inevitable when survey data are collected from the public. Indeed, a major current concern in survey research is the continuing decline in response rates. Also, with landline telephone surveys, the noncoverage rate is increasing as more households are relying only on cell phones. Such sample deficiencies are a limitation for design-based inference. Nonresponse and noncoverage weighting adjustments are used to attempt to reduce the biases in survey estimates resulting from unit nonresponse and noncoverage and imputation methods are widely used to assign values for item nonresponses (Brick and Kalton, 1996). Such weighting adjustments and imputations are necessarily model-dependent (as is the approach that simply analyzes the reported data). Thus even with the design-based approach, some reliance on models is inevitable. The aim is to limit the dependence of the survey estimates on models by minimizing the impact of missing data.

The possible models for use in weighting adjustments are generally constrained by the limited set of auxiliary variables available (data for both respondents and nonrespondents for nonresponse adjustments and exactly comparable data for respondents and the target population for noncoverage adjustments). The effect of the weighting adjustments on the variances of survey estimates can be readily captured using replication methods that include a replication of the adjustments. Most imputation procedures are based on non-Bayesian regression-type models, using responses to other items in the survey to predict the missing responses. Including the effect of imputation on variances is less straightforward, but a range of methods

have been proposed within the design-based framework (e.g., Fay, 1991; Rao and Shao, 1992; Särndal, 1992; Shao and Steel, 1999; Kim and Fuller, 2004; Haziza and Rao, 2006). Bayesian methods have been applied for imputation, particularly using multiple imputation methods (see Schenker et al., 2011, for a recent example and references to many earlier applications). An example of the application of a highly complex Bayesian hierarchical multiple imputation model is described by Heeringa, Little and Ragunathan (2002); this example involves a multivariate model of components of wealth for use when some respondents cannot report exact amounts for some of the components but they can often provide brackets within which the amounts lie. While multiple imputation provides a means of taking imputation variance into account, it is not a panacea. It provides consistent variance estimates only for certain estimates for which allowance is made in the imputation model construction (Kim et al., 2006). It does not, for instance, provide consistent variance estimates for unplanned domain estimates.

As Steve discusses, an area where the design-based approach clearly fails is that of small area estimation. In the past few decades policy makers have been increasingly demanding survey estimates for local areas so that they can target their programs more effectively. Yet, it is impractical to have survey sample sizes large enough to support estimates for such local areas as U.S. counties or school districts (and often even for states). Statistical models that use the survey data together with related local area data as auxiliary information are necessary to produce local area, model-dependent estimates. These models, which "borrow strength" from other areas through the auxiliary data, have been used for many years in U.S. federal programs (see Schaible, 1996, for some examples) and their use is increasing. Many applications employ non-Bayesian or empirical Bayes methods to implement a hierarchical model, such as the Fay-Herriot model (which can be viewed as either a standard mixed model or an empirical Bayes model). These models satisfy many needs but there are situations where the full Bayesian approach is advantageous. With area level modeling, a Bayesian approach can be attractive when the sampling model does not match the linking area level model (Rao, 2003). In such a case, a Bayesian approach can take advantage of the powerful MCMC algorithm, the software for which is readily available; however, the approach is highly computer-intensive. See, for example, Mohadjer et al. (2007) for an application of this approach, DISCUSSION 233

using WinBugs, for estimating adult literacy in U.S. counties based on the National Assessment of Adult Literacy survey. Another example of the application of hierarchical Bayesian methods for small area estimation is the annual production of state and substate estimates from the National Survey on Drug Use and Health, started in 1999, with unit level mixed logistic and Poisson models (Folsom, Shah and Vaish, 1999).

The development of small area models that are used, like those in U.S. Census Bureau's Small Area Income and Poverty Estimates (SAIPE) program, to allocate large amounts of government funding to local areas is a time-consuming activity. Moreover, an extensive and thorough testing program should be undertaken to assess the suitability of the models (see, e.g., Citro, Cohen and Kalton, 1998, for a detailed evaluation of the 1993 SAIPE county estimates of school-age children in poverty). When Bayesian models are used, in addition to other model testing, I think that the analyst should carefully examine and document how sensitive the small area estimates are to the choice of the prior distributions.

The success of small area estimation models depends ultimately on the availability and appropriate use of effective auxiliary variables in the models. For example, in times when changes are occurring, some of the relevant auxiliary variables need to be up-to-date, for otherwise the estimates will be distorted. Before embarking on a small area model approach to serve the needs of a major policy study, a careful appraisal should be conducted to determine whether appreciable biases could occur because of lack of important auxiliary data.

An area of current development extends the small area modeling to encompass data collected in other, larger, surveys. If the larger survey provides estimates for the variables of interest for small area modeling that are sufficiently close to those produced by the original survey, the dependent variables in the small area modeling may simply be changed to those derived from the larger survey, as is the case with the replacement of poverty estimates from the Current Population Survey by the corresponding estimates from the much larger American Community Survey in the SAIPE program (Bell et al., 2007). However, the estimates from the larger survey are often not sufficiently close: they may be of lower quality, perhaps using a different mode of data collection, they may not cover exactly the same survey population, and the variables may not be exactly comparable. While design-based methods may be available for some cases involving combinations

of surveys (e.g., Kim and Rao, 2011), a Bayesian approach for combining data from several sources will often be attractive in complex situations. As an example, to produce county-level estimates of smoking and mammography screening rates, Raghunathan et al. (2007) employed a hierarchical Bayesian modeling approach that combined data from three sources: the National Health Interview Survey (NHIS), conducted by face-to-face interviewing; the much larger Behavioral Risk Factor Surveillance System (BRFSS), conducted by telephone only in households with landline phones; and county-level covariates. The complex multivariate model with three dependent variables (estimates for persons in NHIS households with landline telephones, in NHIS households without landline telephones, and in BRFSS households) is well suited for the use of the MCMC technique of Gibbs sampling. Since the combination of data from several surveys and administrative records can serve a number of policy purposes (Schenker and Raghunathan, 2007), the use of combinations of this type is likely to expand considerably in the future. Combining data in this way will often be facilitated by the analytic tools available in Bayesian analysis. Model validation of such complex models requires careful attention.

In summary, I believe that, despite the limitations noted earlier, the design-based mode of inference should remain the main mode of inference for descriptive estimates from large-scale government surveys. However, model-dependent approaches are appropriate in circumstances such as small area estimation where design-based inference cannot produce the required estimates with adequate precision, and sometimes in the developing field of combining data from surveys and other data sources. In general, I favor non-Bayesian models, but there are cases where a non-Bayesian approach is either extremely difficult or not workable. I accept the use of Bayesian models in situations where their powerful computing methods are needed, with the additional proviso that the robustness of the model estimates to the choice of the prior distributions should be carefully assessed.

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