



**[Ethical Guidelines for Statistical Practice: Report of the Ad Hoc Committee on Professional Ethics]: Comment**

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cles by Student were a part of the discipline of statistics and Gossett was here evidently following standard academic practice concerning dissemination of scholarly findings. The application of statistics to, say, improving the yield of malting barley was a different matter, and here perhaps Gossett's motives were primarily those of a statistical practitioner advancing his employer's profit-making objectives.

Would Gossett's behavior, assuming the motives ascribed to him here, be consistent with these guidelines, particularly those in Section II.A? Did "private interests . . . inappropriately affect (Gossett's) development or application of statistical knowledge"? Did Gossett

"disclose any financial or other interests that may (have affected his) professional statements"? This is unclear. Certainly, the Student publications included no such disclosure. Must methodologic work in statistics include such statements for ethical reasons? Do the discipline and the profession of statistics involve slightly different considerations with respect to ethical standards?

In general, the guidelines as currently evolving appear to be helpful. Statistics, the profession, needs behavioral standards that reflect its willingness to be held accountable; it is most appropriate that our profession is moving to do so.

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## Comment

HERBERT SOLOMON\*

I believe it is a mistake to have "Ethical Guidelines for Statistical Practice," and a committee to administer it. The American Statistical Association would do well to let existing institutions of society handle our behavior without creating another bureaucracy. There are already enough constraints—economic, social, and legal—that operate to keep us responsible in our efforts. The abuses of such a system would far outweigh any gains.

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During the McCarthy era when I was program chairman for an annual meeting, I offered to resign because the ASA office was making it difficult for a politically unpopular speaker to appear at a session. Some ASA officials thought it would be best to bar him and I can see an ethics committee responding in similar fashion. In our zeal to do right we can do some awful things. Fortunately this did not occur.

I think the ASA should keep on doing what it does well: publish journals, organize meetings, develop chapters, develop educational activities, and render statistical advice to government agencies. The notion of having a court available to resolve matters of individual behavior in statistics is anathema to me.

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## Comment

SAMUEL W. GREENHOUSE\*

A scientific or professional society may proclaim in broad generalities the ethical standards required of its members. One would have hoped that such a declaration would be unnecessary, that such external reminders of the need for honesty and integrity in a sense degrade the individual's moral character. However, recent experience in science and in other fields of human activity clearly indicates that an individual's unacceptable conduct is apparently not outside the bounds of that individual's ethical norm. Clearly the individual's own norms were wanting. Therefore there is a justification for the ASA to establish ethical guidelines for statistical practice. Although the published guidelines emphasize practice, that area of statistical work relating to data collection, analysis, and reporting and also to

consulting, it is noticeable that no reference is made to statistical research proper. Are there no guidelines needed for theoretical research and its reporting? I wonder.

In my view, the broad statement of ethical guidelines should be separate from specific references to rules of conduct. Thus I would have a preamble and a statement of general guidelines. I would follow this with an appendix, so to speak, of rules or principles of conduct, such as are given in Sections II.B, C, and D. I suggest this because although the statement on general guidelines may constitute a completed entity and may be non-controversial and acceptable to all members, the specification of rules of conduct may not be. Furthermore, the rules as given are questionable and require more work.

However, whatever form this document takes, I do believe it requires very careful wording and should reflect precisely the rule of acceptable behavior and its

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limitations. It is the latter that sometimes calls into question whether a society should become that specific in declaring principles of good conduct. For example, statement II.C.4 says that data sources should be made available for analysis by others. The only safeguard mentioned is that of privacy. But no mention is made as to when in the course of a study this rule becomes effective. While the data are being collected? While the analysis is going on? Only after the study is published? Similarly with regard to wording, the first paragraph of the preamble contains the phrase "Wherein statistics as a science strives toward truth. . . ." Does the Association mean to get involved in a complex philosophical discussion on what is truth? Particularly for statistics, which strives to draw inferences in the presence of uncertainty, do we even know what role truth can play in our ethical guidelines? For example, a well-done, fully honest study is conducted and concludes that treatment A is better than treatment B. But the truth is that treatment A is not better than B. Or more complicated yet, treatment A is better for some subgroups in the population and worse than B for other subgroups. In either case is the statistician being untruthful?

I could raise questions of some other specific rules given, mostly regarding meaning and intent, but I assume discussion of such details is not appropriate here.

Once ASA makes these guidelines official, the Association will in the future be faced with certain decisions regarding their implementation. Questions relating to the legal implications of the guidelines, sanctions for violators, whether the Committee on Ethics should play an active or passive role in reacting to reports of violations, and so on, clearly follow as consequences. These are difficult issues and I am not sure I have any easy answers. One thing I feel strongly about is that on any of these issues the ASA should not commit itself to any global positions. This means that the document should not spell out a variety of sanctions to be applied to a variety of violations. Let each individual case be

handled separately as it arises. As a matter of fact there is a prior and more important question before considering sanctions for violators, namely, whether and how the Committee on Professional Ethics should get involved with violations. I do not believe that the committee should take an active role in seeking out violators because in my view this is not an appropriate activity of the ASA and, further, even if I thought it were, I cannot see how this could be done, realistically, by a group of volunteer members of the committee. I tend to favor having the committee play a passive role, responding only to alleged violations. But here too I see problems. How will information about violations come to the committee? Do we intend to make every ASA member a guardian of ethical conduct and be on the lookout to report all such violations by colleagues to the committee? This is a horrible thought with horrible implications. These views can only lead me to the conclusion that the document not formalize or detail any policy with regard to violations and sanctions. At the very most, there could perhaps be a statement such as: "The Committee on Ethics when presented with a case of a member violating this code should if it so desires look into the situation and report its findings to the Board."

I cannot speak to the legal implications of the guidelines. In accordance with my views of the organization of the document, alluded to earlier, I see the general statement of ethical guidelines as a set of attainable goals and the separate rules of conduct, if properly presented and acceptable to all, as standard procedures. However, there are so many specific principles enunciated that it is inconceivable to me that there may not be justifiable exceptions arising in the future. Finally, the broad statement of ethical guidelines and the specific rules really apply to the practice of statistics by all, whether members of ASA or not. However, it is not clear to me what force they can have on nonmembers. And I certainly believe they are workable without the need for certifying statisticians.