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POLICY ANALYSIS WITH INCREDIBLE CERTITUDE

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ABSTRACT

Analyses of public policy regularly express certitude about the consequences of alternative policy choices. Yet policy predictions often are fragile, with conclusions resting on critical unsupported assumptions."Then the certitude of policy analysis is not credible. This paper develops a typology of incredible analytical practices and gives illustrative cases. I call these practices conventional certitudes, dueling certitudes, conflating science and advocacy, and wishful extrapolation. I contrast these practices with my vision for credible policy analysis.

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1. Introduction

Analyses of public policy regularly express certitude about the consequences of alternative policy choices. Point predictions are common and expressions of uncertainty are rare. Yet policy predictions often are fragile. Conclusions may rest on critical unsupported assumptions or on leaps of logic. Then the certitude of policy analysis is not credible.

In a research program that began with Manski (1990, 1995) and continues to develop, I have studied identification problems that limit our ability to credibly predict policy outcomes. I have argued that analysts should acknowledge ambiguity rather than feign certitude. And I have shown how elementary principles of decision theory may be used to make reasonable policy choices using available data and credible assumptions. Manski (2007) exposits core ideas and Manski (2009a, 2010) report recent findings.

In my work to date, I have warned against specific analytical practices that promote incredible certitude. I have not, however, sought to classify these practices and consider them in totality. I do so here. My hope in writing this paper is to move future policy analysis away from incredible certitude and towards honest portrayal of partial knowledge.

As prelude, this introductory section differentiates the credibility and logic of policy analysis. I also cite arguments that have been made for incredible certitude. The body of the paper develops a typology of incredible analytical practices and gives illustrative cases. I call these practices *conventional certitudes* (Section 2), *dueling certitudes* (Section 3), *conflating science and advocacy* (Section 4), and *wishful extrapolation* (Section 5). The concluding Section 6 expresses my vision for credible policy analysis.

Illogical and Incredible Analytical Practices

A very broad classification of harmful analytical practices distinguishes those that are illogical from those that are incredible. This paper concerns the latter practices.

Illogical practices are those that commit deductive errors. These may be mundane mistakes in

computation or algebra or, more seriously, they may be non sequiturs. Non sequitors generate pseudo conclusions and, hence, systematically encourage misplaced certitude.¹

While illogical practices contribute to incredible certitude, they should not be a source of lasting controversy. Deductive errors may occur due to imperfect cognitive abilities or insufficient care in reasoning. However, serious analysts should agree on what constitutes errors and should want to correct them when they become aware of them.

Incredible analytical practices are more subtle. These practices are coherent, but rest on untenable assumptions. The logic of inference is summarized by the relationship:

assumptions + data \rightarrow conclusions.

Holding fixed the available data, and presuming avoidance of deductive errors, stronger assumptions yield stronger conclusions. At the extreme, one may achieve certitude by posing sufficiently strong assumptions. The fundamental difficulty of policy analysis is to decide what assumptions to maintain.

Given that strong conclusions are desirable, why not maintain strong assumptions? There is a tension between the strength of assumptions and their credibility. I have called this (Manski, 2003, p. 1):

The Law of Decreasing Credibility: The credibility of inference decreases with the strength of the assumptions maintained.

This "Law" implies that analysts face a dilemma as they decide what assumptions to maintain: Stronger assumptions yield conclusions that are more powerful but less credible.

¹ A common non sequitur occurs when an empirical researcher performs a statistical hypothesis test and interprets non-rejection of a null hypothesis as proof that the hypothesis is correct. Texts on hypothesis testing caution that non-rejection only indicates a lack of empirical evidence that the hypothesis is incorrect.

Credibility is a subjective matter. Whereas analysts should agree on the logic of inference, they may well disagree about the credibility of assumptions. Such disagreements occur often in practice. Moreover, they often persist without resolution.

Persistent disagreements are particularly common when assumptions are *nonrefutable*; that is, when multiple contradictory assumptions are all consistent with the available data. As a matter of logic, disregarding credibility, an analyst can pose a nonrefutable assumption and adhere to it forever in the absence of disproof. Indeed, he can displace the burden of proof, stating "I will maintain this assumption until it is proved wrong." Analysts often do just this. An observer may question the credibility of a non-refutable assumption, but not the logic of holding on to it.

Incentives for Certitude

In principle, an analyst can resolve the tension between the credibility and power of assumptions by posing alternative assumptions of varying credibility and determining the conclusions that follow in each case. In practice, policy studies tend to sacrifice credibility in return for strong conclusions. Why so?

A proximate answer is that policy analysts respond to incentives. I have earlier put it this way (Manski, 2007, pp. 7-8):

The scientific community rewards those who produce strong novel findings. The public, impatient for solutions to its pressing concerns, rewards those who offer simple analyses leading to unequivocal policy recommendations. These incentives make it tempting for researchers to maintain assumptions far stronger than they can persuasively defend, in order to draw strong conclusions.

The pressure to produce an answer, without qualifications, seems particularly intense in the environs of Washington, D.C. A perhaps apocryphal, but quite believable, story circulates about an economist's attempt to describe his uncertainty about a forecast to President Lyndon B. Johnson. The economist presented his forecast as a likely range of values for the quantity under discussion. Johnson is said to have replied, "Ranges are for cattle. Give me a number."

When a President as forceful as LBJ seeks a point prediction with no expression of uncertainty, it is

understandable that his advisors feel compelled to comply.

Jerry Hausman, a longtime econometrics colleague, stated the incentive argument this way at a conference in 1988, when I presented in public my initial findings on partial identification: "You can't give the client a bound. The client needs a point." This comment reflects a perception that I have found to be common among economic consultants. They contend that policy makers are either psychologically unwilling or cognitively unable to cope with ambiguity. Hence, they argue that pragmatism dictates provision of point predictions, even though these predictions may not be credible.

This psychological-cognitive argument for incredible certitude begins from the reasonable premise that policy makers, like other humans, have bounded rationality. However, I think it too strong to draw the general conclusion that "The client needs a point." It may be that some persons think in purely deterministic terms, but a considerable body of research measuring expectations shows that most make sensible probabilistic predictions when asked to do so; see Manski (2004). I see no reason to expect that policy makers are less capable than ordinary people.

Support for Certitude in Philosophy of Science

The view that analysts should offer sharp predictions is not confined to U. S. presidents and economic consultants. It has a long history in the philosophy of science.

Over fifty years ago, Milton Friedman expressed this perspective in an influential methodological essay. Friedman (1953) placed prediction as the central objective of science, writing (p. 5): "The ultimate goal of a positive science is the development of a 'theory' or 'hypothesis' that yields valid and meaningful (i.e. not truistic) predictions about phenomena not yet observed." He went on to say (p. 10):

The choice among alternative hypotheses equally consistent with the available evidence must to some extent be arbitrary, though there is general agreement that relevant considerations are suggested by the criteria 'simplicity' and 'fruitfulness,' themselves notions that defy completely objective specification.

Thus, Friedman counseled scientists to choose one hypothesis (that is, make a strong assumption), even though this may require the use of "to some extent . . . arbitrary" criteria. He did not explain why scientists should choose a single hypothesis out of many. He did not entertain the idea that scientists might offer predictions under the range of plausible hypotheses that are consistent with the available evidence.

The idea that a scientist should choose one hypothesis among those consistent with the data is not peculiar to Friedman. According to Seebok (1981), over a century ago the philosopher Charles Sanders Peirce offered this cryptic rule for choosing among the hypotheses that are consistent with available data: "Facts cannot be explained by a hypothesis more extraordinary than these facts themselves; and of various hypotheses the least extraordinary must be adopted."

Researchers wanting to justify adherence to a particular hypothesis sometime refer to *Ockham's Razor*, the medieval philosophical notion that "Plurality should not be posited without necessity." The *Encyclopedia Brittanica* gives the usual modern interpretation, stating: "The principle gives precedence to simplicity; of two competing theories, the simplest explanation of an entity is to be preferred." The philosopher Richard Swinburne writes (Swinburne, 1997, p. 1):

I seek...to show that—other things being equal—the simplest hypothesis proposed as an explanation of phenomena is more likely to be the true one than is any other available hypothesis, that its predictions are more likely to be true than those of any other available hypothesis, and that it is an ultimate a priori epistemic principle that simplicity is evidence for truth.

The choice criteria offered here are as imprecise as the one given by Friedman. What does Peirce mean by "the least extraordinary" hypothesis? What do Brittanica and Swinburne mean by "simplicity?"

However one may operationalize the various philosophical dicta for choosing a single hypothesis, the relevance of philosophical thinking to policy analysis is not evident. In policy analysis, knowledge is instrumental to the objective of making good policy choices. When philosophers discuss the logical

²Encyclopædia Britannica Online. 25 Jun. 2010

http://www.britannica.com/EBchecked/topic/424706/Ockhams-razor>.

foundations and human construction of knowledge, they do so without posing this or another explicit objective. Does use of criteria such as "simplicity" to choose one hypothesis among those consistent with the data promote good policy making? This is the relevant question for policy analysis. To the best of my knowledge, thinking in philosophy has not addressed it.

2. Conventional Certitudes

John Kenneth Galbraith popularized the term *conventional wisdom*, writing (Galbraith, 1958, chap. 2): "It will be convenient to have a name for the ideas which are esteemed at any time for their acceptability, and it should be a term that emphasizes this predictability. I shall refer to these ideas henceforth as the conventional wisdom." In 2010, Wikipedia nicely put it this way:³

Conventional wisdom (CW) is a term used to describe ideas or explanations that are generally accepted as true by the public or by experts in a field. The term implies that the ideas or explanations, though widely held, are unexamined and, hence, may be reevaluated upon further examination or as events unfold. Conventional wisdom is not necessarily true.

I shall similarly use the term *conventional certitudes* to describe predictions that are generally accepted as true, but that are not necessarily true.

In the United States today, conventional certitude is exemplified by Congressional Budget Office (CBO) *scoring* of pending federal legislation. I will use CBO scoring as an extended case study.

³ http://en.wikipedia.org/wiki/Conventional wisdom. May 8, 2010.

2.1. CBO Scoring

The CBO was established in the Congressional Budget Act of 1974. Section 402 states (Committee on the Budget, U. S. House of Representatives, 2008, p. 39-40):

The Director of the Congressional Budget Office shall, to the extent practicable, prepare for each bill or resolution of a public character reported by any committee of the House of Representatives or the Senate (except the Committee on Appropriations of each House), and submit to such committee—(1) an estimate of the costs which would be incurred in carrying out such bill or resolution in the fiscal year in which it is to become effective and in each of the 4 fiscal years following such fiscal year, together with the basis for each such estimate;

This language has been interpreted as mandating the CBO to provide point predictions (aka scores) of the budgetary impact of pending legislation. Whereas the 1974 legislation called for prediction five years into the future, the more recent practice has been to forecast ten years out. CBO scores are conveyed in letters that the Director writes to leaders of Congress and chairs of Congressional committees. They are not accompanied by measures of uncertainty, even though legislation often proposes complex changes to federal law, whose budgetary implications must be difficult to foresee.

Serious policy analysts recognize that scores for complex legislation are fragile numbers, derived from numerous untenable assumptions. Considering the closely related matter of scoring the effects of tax changes on federal revenues, Auerbach (1996) wrote (p. 156): "in many instances, the uncertainty is so great that one honestly could report a number either twice or half the size of the estimate actually reported."

Credible scoring is particularly difficult to achieve when proposed legislation may significantly affect the behavior of individuals and firms, by changing the incentives they face to work, hire, make purchases, and so on. Academic economists, who have the luxury of studying subjects for years, have worked long and hard to learn how specific elements of public policy affect individual and firm behavior, but with only limited success. CBO analysts face the more difficult challenge of forecasting the effects of

the many policy changes that may be embodied in complex legislation, and they must do so under extreme time pressure.

In light of the above, it is remarkable that CBO scores have achieved broad acceptance within American society. In our highly contentious political age, the scores of pending legislation have been one of the few statistics that both Democratic and Republican Members of Congress do not dispute. And media reports largely take them at face value.

2.2. CBO Scoring of the Patient Protection and Affordable Care Act of 2010

CBO scoring of the major health care legislation enacted in 2009–2010 illustrates well current practice. Throughout the legislative process, Congress and the media paid close attention to the scores of alternative bills considered by various Congressional committees. A culminating event occurred on March 18, 2010 when the CBO, assisted by staff of the Joint Committee on Taxation (JCT), provided a preliminary score for the combined consequences of the Patient Protection and Affordable Care Act and the Reconciliation Act of 2010. CBO director Douglas Elmendorf wrote to House of Representatives Speaker Nancy Pelosi as follows (Elmendorf, 2010a, p.2): "CBO and JCT estimate that enacting both pieces of legislation would produce a net reduction of changes in federal deficits of \$138 billion over the 2010–2019 period as a result of changes in direct spending and revenue."

Anyone seriously contemplating the many changes to federal law embodied in this legislation should recognize that the \$138 billion prediction of deficit reduction can be no more than a very rough estimate. However, the twenty-five page letter from Elmendorf to Pelosi expressed no uncertainty and did not document the methodology generating the prediction.

Media reports largely accepted the CBO scores as fact, the hallmark of conventional certitude. For example, a March 18, 2010 *New York Times* article documenting how CBO scoring was critical in shaping

the legislation reported (Herszenhorn, 2010): "A preliminary cost estimate of the final legislation, released by the Congressional Budget Office on Thursday, showed that the President got almost exactly what he wanted: a \$940 billion price tag for the new insurance coverage provisions in the bill, and the reduction of future federal deficits of \$138 billion over 10 years." The *Times* article did not question the validity of the \$940 and \$138 billion figures.

Interestingly, the certitude that CBO expressed when predicting budgetary impacts ten years into the future gave way to considerable uncertainty when considering longer horizons. In his letter to Pelosi, Director Elmendorf wrote (p. 3):

Although CBO does not generally provide cost estimates beyond the 10-year budget projection period, certain Congressional rules require some information about the budgetary impact of legislation in subsequent decades. Therefore, CBO has developed a rough outlook for the decade following the 2010-2019 period. . . . Our analysis indicates that H.R. 3590, as passed by the Senate, would reduce federal budget deficits over the ensuing decade relative to those projected under current law—with a total effect during that decade that is in a broad range between one-quarter percent and one-half percent of gross domestic product (GDP).

Further insight into the distinction that the CBO drew between the ten-year and longer horizons emerges from a March 19 letter that the Director wrote to Congressman Paul Ryan. He wrote (Elmensdorf, 2010b, p. 3):

A detailed year-by-year projection, like those that CBO prepares for the 10-year budget window, would not be meaningful over a longer horizon because the uncertainties involved are simply too great. Among other factors, a wide range of changes could occur—in people's health, in the sources and extent of their insurance coverage, and in the delivery of medical care (such as advances in medical research, technological developments, and changes in physicians' practice patterns)—that are likely to be significant but are very difficult to predict, both under current law and under any proposal.

Thus, the CBO was quick to acknowledge uncertainty when asked to predict the budgetary impact of the health care legislation more than ten years out, phrasing its forecast as a "broad range" rather than as a point estimate.

Why did the CBO express uncertainty only when making predictions beyond the ten-year horizon? Longer term predictions may be more uncertain than shorter-term ones, but it is not reasonable to set a discontinuity at ten years, with certitude expressed up to that point and uncertainty only beyond it. The potential behavioral changes cited by Elmendorf in his letter to Ryan, particularly changes in insurance coverage and in physicians' practice patterns, could well occur rapidly after passage of the new legislation.

I would conjecture that Elmendorf and his staff were well aware that the ten-year prediction sent to Speaker Pelosi was at most a rough estimate. However, they must have felt compelled to adhere to the established CBO practice of expressing certitude when providing ten-year predictions, which play a formal role in the Congressional budget process.

2.3. Interval Scoring

Since its creation by the Congressional Budget Act of 1974, the CBO has established and maintained an admirable reputation for impartiality. Perhaps it is best to leave well enough alone and have the CBO continue to express certitude when it scores pending legislation, even if the certitude is only conventional rather than credible.

I understand the temptation to leave well enough alone, but I think it unwise to try to do so. I would like to believe that Congress will make better decisions if the CBO provides it with credible forecasts of budgetary impacts. Whether or not this is a reasonable expectation, I worry that someday sooner or later the existing social contract to take CBO scores at face value will break down. Conventional certitudes that lack foundation cannot last indefinitely. I think it better for the CBO to preemptively act to protect its reputation than to have some disgruntled group in Congress or the media declare that the emperor has no clothes.

It has been suggested that, when performing its official function of scoring legislation, the CBO is required to provide no more than a single point estimate. For example, in a 2005 article in the *American*

Economic Review, CBO analyst Benjamin Page wrote:

Scoring has a specific meaning in the context of the federal budget process. Under the Congressional Budget Act of 1974, the Congressional Budget Office provides a cost estimate, or "score," for each piece of legislation that is reported by a Congressional committee. . . . By its nature, the cost estimate must be a single point estimate.

However, my reading of the Congressional Budget Act suggests that the CBO is not prohibited from presenting measures of uncertainty when performing its official function of scoring.⁴

Presuming that the CBO can express uncertainty, how should it do so? A simple approach would be to provide interval forecasts of the budgetary impacts of legislation. Stripped to its essentials, computation of an interval forecast just requires that the CBO produce two scores for a bill, a low score and a high score, and report both. If the CBO must provide a point prediction for official purposes, it can continue to do so, with some convention used to locate the point within the interval forecast.

This idea is not entirely new. A version of it was briefly entertained by Alan Auerbach in the article mentioned earlier. Auerbach wrote "Presumably, forecasters could offer their own subjective confidence intervals for the estimates they produce, and this extra information ought to be helpful for policymakers." He went on to caution "However, there is also the question of how well legislators without formal statistical

⁴ A document on the Congressional budget describes the process for modifying the CBO scoring procedure. Committee on the Budget, U. S. House of Representatives (2008) states (p. 156):

These budget scorekeeping guidelines are to be used by the House and Senate Budget Committees, the Congressional Budget Office, and the Office of Management and Budget (the "scorekeepers") in measuring compliance with the Congressional Budget Act of 1974 (CBA), as amended, and GRH 2 as amended. The purpose of the guidelines is to ensure that the scorekeepers measure the effects of legislation on the deficit consistent with established scorekeeping conventions and with the specific requirements in those Acts regarding discretionary spending, direct spending, and receipts. These rules shall be reviewed annually by the scorekeepers and revised as necessary to adhere to the purpose. These rules shall not be changed unless all of the scorekeepers agree. New accounts or activities shall be classified only after consultation among the scorekeepers. Accounts and activities shall not be reclassified unless all of the scorekeepers agree.

This passage indicates that the CBO cannot unilaterally change its scoring procedure, but that change can occur if the various "scorekeepers" agree.

training would grasp the notion of a confidence interval."

The CBO need not describe its interval forecasts as confidence intervals in the formal sense of statistics textbooks. After all, the main sources of uncertainty about budgetary impacts are not statistical in nature. They are rather that analysts are not sure what assumptions are realistic when they make predictions. A CBO interval forecast would be more appropriately described as the result of a sensitivity analysis, the sensitivity being to variation in the maintained assumptions.

3. Dueling Certitudes

A rare commentator who rejected the CBO's prediction that the health care legislation would reduce the budget deficit by \$138 billion was Douglas Holtz-Eakin, a former Director of the CBO. He dismissed the CBO score and offered his own, writing (Holtz-Eakin, 2010): "In reality, if you strip out all the gimmicks and budgetary games and rework the calculus, a wholly different picture emerges: The health care reform legislation would raise, not lower, federal deficits, by \$562 billion." The CBO and Holtz-Eakin scores differed hugely, by \$700 billion. Yet they shared the common feature of certitude. Both were presented as exact, with no expression of uncertainty.

This provides an example of *dueling certitudes*. Hotz-Eakin did not assert that the CBO committed a deductive error. He instead questioned the assumptions maintained by the CBO in performing its derivation, and he showed that a very different result emerges under alternative assumptions that he preferred. Each score may make sense in its own terms, each combining available data with assumptions to draw logically valid conclusions. Yet the two scores are sharply contradictory.

Anyone familiar with the style of policy analysis regularly practiced within the Washington Beltway, and often well beyond it, will immediately recognize the phenomenon of dueling certitudes. To illustrate,

I will draw on my experience a decade ago chairing a National Research Council committee on illegal drug policy (National Research Council, 1999, 2001).

3.1. The RAND and IDA Reports on Illegal Drug Policy

During the mid-1990s, two studies of cocaine control policy played prominent roles in discussions of federal policy towards illegal drugs. One was performed by analysts at RAND (Rydell and Everingham, 1994) and the other by analysts at the Institute for Defense Analyses (IDA) (Crane, Rivolo, and Comfort, 1997). The two studies posed similar hypothetical objectives for cocaine-control policy, namely reduction in cocaine consumption in the United States by 1 percent. Both studies predicted the monetary cost of using certain policies to achieve this objective. However, RAND and IDA used different assumptions and data to reach dramatically different policy conclusions.

The authors of the RAND study specified a model of the supply and demand for cocaine that aimed to formally characterize the complex interaction of producers and users and the subtle process through which alternative cocaine-control policies may affect consumption and prices. They used this model to evaluate various demand-control and supply-control policies and reached this conclusion (p.xiii):

The analytical goal is to make the discounted sum of cocaine reductions over 15 years equal to 1 percent of current annual consumption. The most cost-effective program is the one that achieves this goal for the least additional control-program expenditure in the first projection year. The additional spending required to achieve the specified consumption reduction is \$783 million for source-country control, \$366 million for interdiction, \$246 million for domestic enforcement, or \$34 million for treatment (see Figure S.3). The least costly supply-control program (domestic enforcement) costs 7.3 times as much as treatment to achieve the same consumption reduction.

The authors of the IDA study examined the time-series association between source-zone interdiction activities and retail cocaine prices. They reached an entirely different policy conclusion (p. 3):

A rough estimate of cost-effectiveness indicates that the cost of decreasing cocaine use by one percent through the use of source-zone interdiction efforts is on the order of a few tens of millions of dollars per year and not on the order of a billion dollars as reported in previous research [the RAND study]. The differences are primarily attributed to a failure in the earlier research to account for the major costs imposed on traffickers by interdiction operations and overestimation of the costs of conducting interdiction operations.

Thus, the IDA study specifically rebutted a key finding of the RAND study.

When they appeared, the RAND and IDA drew attention to the ongoing struggle over federal funding of drug control activities. The RAND study was used to argue that funding should be shifted towards drug treatment programs and away from activities to reduce drug production or to interdict drug shipments. The subsequent IDA study, which was undertaken in part as a re-analysis of the RAND findings, was used to argue that interdiction activities should be funded at present levels or higher.

For example, in a statement to the Subcommittee on National Security, International Affairs, and Criminal Justice, Committee on Government Reform and Oversight, U.S. House of Representatives (1996), Lee Brown, then director of The Office of National Drub Control Policy (ONDCP), stated (p. 61):

Let me now talk about what we know works in addressing the drug problem. There is compelling evidence that treatment is cost-effective and provides significant benefits to public safety. In June 1994, a RAND Corporation study concluded that drug treatment is the most cost-effective drug control intervention.

Later, in a hearing specifically devoted to the IDA study, "Review of the Internal Administration's Study Critical of Clinton Drug Policy and White House Suppression of the Study," chair William H. Zeliff began this way (Subcommittee on National Security, International Affairs, and Criminal Justice(1998, p. 1):

We are holding these hearings today to review a study on drug policy, a study we believe to have significant findings, prepared by an independent group, the Institute for Defense Analysis, at the request of Secretary of Defense Perry in 1994....[T]he subcommittee has questioned for some time the administration's strong reliance on treatment as the key to winning our Nation's drug war, and furthermore this subcommittee has questioned the wisdom of drastically cutting to the bone

interdiction programs in order to support major increases in hard-core drug addiction treatment programs. The basis for this change in strategy has been the administration's reliance on the 1994 RAND study.

3.2. The National Research Council Assessment

At the request of ONDCP, the National Research Council Committee on Data and Research for Policy on Illegal Drugs (henceforth, the Committee) assessed the RAND and IDA studies. This assessment was published as a committee report (National Research Council, 1999).

After examining the assumptions, data, methods, and findings of the two studies, the Committee concluded that neither constitutes a persuasive basis for the formation of cocaine control policy. The Committee summarized its assessment of the RAND study as follows (p. 28):

The RAND study is best thought of as conceptual research offering a coherent way to think about the cocaine problem. The study documents a significant effort to identify and model important elements of the market for cocaine. It represents a serious attempt to formally characterize the complex interaction of producers and users and the subtle process through which alternative cocaine-control policies may affect consumption and prices. The study establishes an important point of departure for the development of richer models of the market for cocaine and for empirical research applying such models to evaluate alternative policies.

However, the RAND study does not yield usable empirical findings on the relative cost-effectiveness of alternative policies in reducing cocaine consumption. The study makes many unsubstantiated assumptions about the processes through which cocaine is produced, distributed, and consumed. Plausible changes in these assumptions can change not only the quantitative findings reported, but also the main qualitative conclusions of the study. Hence the study's findings do not constitute a persuasive basis for the formation of cocaine control policy.

It summarized its assessment of the IDA study this way (p.43):

The IDA study is best thought of as a descriptive time-series analysis of statistics relevant to analysis of the market for cocaine in the United States. The study makes a useful contribution by displaying

a wealth of empirical time-series evidence on cocaine prices, purity, and use since 1980. Efforts to understand the operation of the market for cocaine must be cognizant of the empirical data. The IDA study presents many of those data and calls attention to some intriguing empirical associations among the various series.

However, the IDA study does not yield useful empirical findings on the cost-effectiveness of interdiction policies to reduce cocaine consumption. Major flaws in the assumptions, data, and methods of the study make it impossible to accept the IDA findings as a basis for the assessment of interdiction policies. For example, the conclusions drawn from the data rest on the assumption that all time-series deviations in cocaine price from an exponential decay path should be attributed to interdiction events, not to other forces acting on the market for cocaine. Numerous problems diminish the credibility of the cocaine price series developed in the study, and an absence of information prevents assessment of the procedure for selecting interdiction events.

Thus, the Committee concluded that neither the RAND nor the IDA study provides a credible estimate of what it would cost to use alternative policies to reduce cocaine consumption in the United States.

When I think now about the RAND and IDA studies, I consider their many specific differences to be less salient than their shared lack of credibility. Each study may be coherent internally, but each rests on such a fragile foundation of weak data and unsubstantiated assumptions as to entirely undermine its findings. To its great frustration, the NRC committee had to conclude that the nation should not draw even the most tentative policy lessons from either study. Neither yields usable findings.

What troubles me most about both studies is their injudicious efforts to draw strong policy conclusions. It is not necessarily problematic for researchers to try to make sense of weak data and to entertain unsubstantiated conjectures. However, the strength of the conclusions drawn in a study should be commensurate with the quality of the evidence. When researchers overreach, they not only give away their own credibility but they diminish public trust in science more generally. The damage to public trust is particularly severe when researchers inappropriately draw strong conclusions about matters as contentious as drug policy.

3.3. Analysis without Certitude: Sentencing and Recidivism

I would like to be able to discuss an analysis of illegal drug policy that does not line up on one side or the other of the debate between treatment and law enforcement. However, the dueling certitudes illustrated by the RAND and IDA reports seem characteristic of the study of drug policy. Indeed, dueling certitudes are common in analysis of criminal justice policy more broadly.

It need not be this way. Rather than make strong unsubstantiated assumptions that yield strong incredible conclusions on one or the other side of a policy debate, analysts could aim to illuminate how the assumptions posed determine the conclusions drawn. To show how this may be accomplished, Manski and Nagin (1998) considered how sentencing of convicted juvenile offenders affects recidivism. I summarize our work here.

Background

Ample observational data are available on the outcomes experienced by juvenile offenders given the sentences that they actually receive. However, researchers have long debated the counterfactual outcomes that offenders would experience if they were to receive other sentences. There has been particular disagreement about the relative merits of confinement in residential treatment facilities and diversion to nonresidential treatment.

Confinement has been favored by the "medical model" of deviance, which views deviance as symptomatic of an underlying pathology that requires treatment. In this view, the juvenile justice system should determine the needs of the child and direct the treatment resources of the state to ameliorating those needs. Confinement is thought beneficial because it enables treatment.

Non-confinement has been favored by criminologists who are skeptical of the ability of the justice system to deliver effective treatment. This skepticism stems in part from the "labeling" view of deviance.

According to this view, a constellation of negative consequences may flow from official processing of a juvenile as deviant, even with a therapeutic intent. Confinement in a residential facility may make it more likely that the person thinks of himself as deviant, may exclude him from the normal routines of life, and may place him into closer affinity with deviant others who may reinforce negative feelings the person has about himself. Given these concerns, labeling theorists have promoted the "secondary deviance" hypothesis, which holds that confinement is more likely to lead to recidivism than is nonresidential treatment.

To adjudicate between the competing predictions of the medical model and the secondary deviance hypothesis, it would be useful to perform experiments that randomly assign some offenders to confinement and others to nonresidential treatment. However, experimentation with criminal justice policy is difficult to implement. Hence, empirical research on sentencing and recidivism has relied on observational data. Analysts have typically combined the available data with the strong but suspect assumption that judges randomly sentence offenders conditional on covariates that are observable to researchers.⁵

Our Analysis

Manski and Nagin (1998) implemented a cautious mode of "layered" analysis that begins with no assumptions about how judges sentence offenders and then moves from weak, highly credible assumptions to stronger, less credible ones. Exploiting the rich event-history data on juvenile offenders collected by the state of Utah, we presented several sets of findings and showed how conclusions about sentencing policy vary depending on the assumptions made.

We first reported bounds obtained without making any assumptions at all about the manner in which judges choose sentences. We then presented bounds obtained under two alternative models of judicial

⁵ Smith and Paternoster (1990) observe (p. 1111-1112): "high risk youth are more likely to receive more severe dispositions. Thus, those individuals assigned more severe sanctions would be more likely to commit new offenses whether or not any relationship existed between juvenile court disposition and future offending." They go on to argue that it is implausible to assume that treatment selection is random conditional on the covariates that researchers typically can measure.

decision making. The *outcome optimization* model assumes judges make sentencing decisions that minimize the chance of recidivism. The *skimming* model assumes that judges classify offenders as "higher risk" or "lower risk," sentencing only the former to residential confinement. Each model expresses an easily understood hypothesis about judicial decision making. Finally, we brought to bear further assumptions in the form of *exclusion restrictions*, which posit that specified sub-populations of offenders respond to sentencing similarly but face different sentencing selection rules.

The empirical findings turned out to depend critically on the assumptions imposed. With nothing assumed about sentencing rules or response, only weak conclusions could be drawn about the recidivism implications of the two sentencing options. With assumptions made about judicial decision making, the results were far more informative. If one believes that Utah judges choose sentences in an effort to minimize recidivism, the empirical results point to the conclusion that residential confinement exacerbates criminality on average. If one believes that judges behave in accord with the skimming model, the results suggest the opposite conclusion, namely that residential confinement has an ameliorative effect on average. Imposition of an exclusion restriction strengthened each of these opposing conclusions.

Abstracting from the specifics of our juvenile-justice application, we viewed our analysis as demonstrating the value of reporting layered empirical findings. Holding fixed the available data and presuming the absence of deductive errors, dueling certitudes can occur only if analysts make conflicting strong assumptions. Reporting layered findings makes clear how the conclusions drawn depend on the assumptions posed.

4. Conflating Science and Advocacy

In the Introduction, I summarized the logic of inference by the relationship: assumptions + data → conclusions. Holding fixed the available data, the scientific method supposes that the directionality of inference runs from left to right. One poses assumptions and derives conclusions. However, one can reverse the directionality, seeking assumptions that imply predetermined conclusions. The latter practice characterizes advocacy.

Policy analysts inevitably portray their deliberative processes as scientific. Yet some analysis may be advocacy wrapped in the rhetoric of science. Studies published by certain think tanks seem almost inevitably to reach strong liberal or conservative policy conclusions. The conclusions of some academic researchers are similarly predictable. Perhaps these analysts begin without pre-conceptions and are led by the logic of inference to draw strong conclusions. Or they may begin with conclusions they find congenial and work backwards to support them.

Twenty years ago, when I visited Washington often as Director of the Institute for Research on Poverty, a senior Congressional staffer told me that he found it prudent to view all policy analysis as advocacy. He remarked that he preferred to read studies performed by think tanks with established reputations as advocates to ones performed by ostensibly neutral academic researchers. He said that he often felt able to learn from the think-tank studies, because he was aware of the biases of the authors. In contrast, he found it difficult to learn from academic research by authors who may have biases but attempt to conceal them.

Milton Friedman, whom I have previously quoted in the Introduction, had a seductive ability to conflate science and advocacy. I give one illustration here. See Krugman (2007) for a broader portrait of Friedman as scientist and advocate.

4.1. Friedman and Educational Vouchers

Proponents of educational vouchers for school attendance have argued that American school finance policy limits the options available to students and impedes the development of superior educational alternatives. Government operation of free public schools, they say, should be replaced by vouchers permitting students to choose among any school meeting specified standards. The voucher idea has a long history. Tom Paine proposed a voucher plan in 1792, in *The Rights of Man*. The awakening of modern interest is usually credited to Friedman (1955,1962). His writing on the subject is emblematic of analysis that conflates science and advocacy

Friedman cited no empirical evidence relating school finance to educational outcomes. He posed a purely theoretical classical economic argument for vouchers, which began as follows (Friedman, 1955):

The role assigned to government in any particular field depends, of course, on the principles accepted for the organization of society in general. In what follows, I shall assume a society that takes freedom of the individual, or more realistically the family, as its ultimate objective, and seeks to further this objective by relying primarily on voluntary exchange among individuals for the organization of economic activity. In such a free private enterprise exchange economy, government's primary role is to preserve the rules of the game by enforcing contracts, preventing coercion, and keeping markets free. Beyond this, there are only three major grounds on which government intervention is to be justified. One is "natural monopoly" or similar market imperfection which makes effective competition (and therefore thoroughly voluntary ex change) impossible. A second is the existence of substantial "neighborhood effects," i.e., the action of one individual imposes significant costs on other individuals for which it is not feasible to make him compensate them or yields significant gains to them for which it is not feasible to make them compensate himcircumstances that again make voluntary exchange impossible. The third derives from an ambiguity in the ultimate objective rather than from the difficulty of achieving it by voluntary exchange, namely, paternalistic concern for children and other irresponsible individuals.

He went on to argue that the "three major grounds on which government intervention is to be justified" justify government supply of educational vouchers but not government operation of free public schools,

which he referred to as "nationalization" of the education industry.

Repeatedly, Friedman entertained a ground for government operation of schools and then dismissed it. Here is an excerpt from his discussion of the neighborhood-effects argument:

One argument from the "neighborhood effect" for nationalizing education is that it might otherwise be impossible to provide the common core of values deemed requisite for social stability. . . . This argument has considerable force. But it is by no means clear that it is valid.

Another special case of the argument that governmentally conducted schools are necessary to keep education a unifying force is that private schools would tend to exacerbate class distinctions. Given greater freedom about where to send their children, parents of a kind would flock together and so prevent a healthy intermingling of children from decidedly different backgrounds. Again, whether or not this argument is valid in principle, it is not at all clear that the stated results would follow.

This passage is intriguing. Friedman cited no empirical evidence regarding neighborhood effects, nor did he call for research on the subject. Instead, he simply stated "it is by no means clear" and "it is not at all clear" that neighborhood effects warrant public schooling.

Rhetorically, Friedman placed the burden of proof on free public schooling, effectively asserting that vouchers are the preferred policy in the absence of evidence to the contrary. This is the rhetoric of advocacy, not science. An advocate for public schooling could just as well reverse the burden of proof, arguing that the existing educational system should be retained in the absence of evidence. The result would be dueling certitudes.

As I have discussed in Manski (1992), a scientific analysis would have to acknowledge that economic theory per se does not suffice to draw conclusions about the optimal design of educational systems. It would have to stress that the merits of alternative designs depends on the magnitudes and natures of the market imperfections and neighborhood effects that Friedman noted as possible justifications for government intervention. And it would have to observe that information about these matters was almost entirely lacking when Friedman wrote in the mid-1950s. Indeed, much of the needed information remains lacking today.

5. Wishful Extrapolation

The Second Edition of the Oxford English Dictionary (OED) defines extrapolation as "the drawing of a conclusion about some future or hypothetical situation based on observed tendencies." Extrapolation in this sense is essential to the use of data in policy analysis. Policy analysis is not just historical study of observed tendencies. A central objective is to inform policy choice by predicting the outcomes that would occur if past policies were to be continued or alternative ones were to be enacted.

While I am hesitant to second-guess the *OED*, I think it important to observe that its definition of extrapolation is incomplete. The logic of inference does not enable any conclusions about future or hypothetical situations to be drawn based on observed tendencies per se. Assumptions are essential. Thus, I will amend the *OED* definition and say that extrapolation is "the drawing of a conclusion about some future or hypothetical situation based on observed tendencies and maintained assumptions."

Given available data, the credibility of extrapolation depends on what assumptions are maintained. Researchers often use untenable assumptions to extrapolate. I will refer to this manifestation of incredible certitude as *wishful extrapolation*.

Perhaps the most common extrapolation practice is to assume that a future or hypothetical situation is identical to an observed one in some respect. Analysts regularly make such *invariance* assumptions, sometimes with good reason but often without basis. Certain invariance assumptions achieve the status of conventional certitudes, giving analysts license to pose them without fear that their validity will be questioned.

I first describe a prominent case of wishful extrapolation, paraphrasing the discussion of selective incapacitation in Manski (1995, 2007). I then discuss extrapolation from randomized experiments, using the drug approval process of the Food and Drug Administration to illustrate.

5.1. Selective Incapacitation

In 1982, the RAND Corporation released a study of criminal behavior as reported in 1978 by a sample of prison and jail inmates in California, Michigan, and Texas (Chaiken and Chaiken, 1982; Greenwood and Abrahamse, 1982). Most respondents reported that they had committed five or fewer crimes per year in the period before their current arrest and conviction. A small group reported much higher rates of crime commission, in some cases more than one hundred per year.

The researchers found a strong within-sample empirical association between various personal covariates (past convictions, drug use, and employment) and the event that a sample member had been a high-rate offender. This finding suggested to part of the research team that *selective incapacitation* should be encouraged as a crime-fighting tool (Greenwood and Abrahamse, 1982). Selective incapacitation calls for the sentencing of convicted criminals to be tied to predictions of their future criminality. Those with backgrounds that predict high rates of offenses would receive longer prison terms than those with other backgrounds.

The RAND study generated much controversy, especially when a prediction approach devised by Greenwood found its way into legislative proposals for selective incapacitation (Blackmore and Welsh, 1983; Blumstein *et al.*, 1986). Some of the controversy concerned the normative acceptability of selective incapacitation, but much of it concerned the credibility of extrapolation from the RAND findings.

The findings characterized the empirical association between background and reported crime commission within one cohort of inmates imprisoned in three states under the sentencing policies then in effect. Would this association continue to hold when applied to other cohorts of inmates in other states? Would it hold when applied to convicted criminals who are not imprisoned under existing sentencing policies? Would it hold if sentencing policy were to change? In particular, would it hold if selective incapacitation were to be implemented?

The RAND study did not address these questions. Greenwood's approach to prediction of criminality simply assumed that the empirical association between background and reported crime commission would remain approximately the same when extrapolated to other times, places, and sentencing policies. As I see it, this invariance assumption was wishful extrapolation.

5.2. Extrapolation from Randomized Experiments: The FDA Drug Approval Process

The great appeal of randomized experiments is that they often deliver credible certitude about the outcomes of policies within a population under study. Standard experimental protocol calls for specification of a study population from which random samples of persons are drawn to form treatment groups. All members of a treatment group are assigned the same treatment.

Assume that treatment response is *individualistic*; that is, each person's outcome depends only on his own treatment, not on those received by other members of the study population. Then the distribution of outcomes realized by a treatment group is the same (up to random sampling error) as would occur if this treatment were assigned to all members of the population. Thus, when the assumption of individualistic treatment response is credible, a randomized experiment enables one to draw credible sharp conclusions about the outcomes that would occur if a policy were to be applied to the entire study population.

A common problem of policy analysis is to extrapolate experimental findings to a policy of interest. To accomplish this, analysts regularly assume that the distribution of outcomes that would occur under the policy of interest would be the same as the distribution of outcomes realized by a specific experimental treatment group. This invariance assumption sometimes is reasonable, but often it is wishful extrapolation.

There are many reasons why policies of interest may differ from the those studied in experiments, making the invariance assumption suspect. I will discuss three here. The use of randomized experiments to inform policy choice has been particularly important in medicine. I will use the drug approval process of

the Food and Drug Administration (FDA) to illustrate.

The Study Population and the Population of Interest

The study populations of randomized experiments may differ from the population of policy interest. Participation in experiments cannot be mandated in democracies. Hence, study populations consist of persons who volunteer to participate. Experiments reveal the distribution of treatment response among these volunteers, not within the population to whom a policy would be applied.

Consider the randomized clinical trials (RCTs) performed by pharmaceutical firms to obtain FDA approval to market new drugs. The volunteer participants in these trials may or may not be representative of the relevant patient population. The volunteers are persons who respond to the financial and medical incentives offered by pharmaceutical firms. Financial incentives may be payment to participate in a trial or receipt of free treatments. The medical incentive is that participation in a trial gives a person a chance of receiving new drugs that are not otherwise available.

The study population materially differs from the relevant patient population if treatment response in the group who volunteer for a trial differs from treatment response among those who do not volunteer. When the FDA uses trial data to make drug approval decisions, it implicitly assumes that treatment response in the patient population is similar to that observed in the trial. The accuracy of this invariance assumption often is unknown.

The Experimental Treatments and the Treatments of Interest

The treatments assigned in experiments may differ from those that would be assigned in actual policies. Consider again the RCTs performed for drug approval. These trials are normally double-blinded, neither the patient nor his physician knowing the assigned treatment. Hence, a trial reveals the distribution of response in a setting where patients and physicians are uncertain what drug a patient receives. It does not

reveal what response would be in a real clinical setting where patients and physicians would have this information and be able to react to it.

Another source of difference between the treatments assigned in experiments and those that would be assigned in actual policies occurs when evaluating vaccines for prevention of infectious disease. The assumption of individualistic treatment response traditionally made in analysis of experiments does not hold when considering vaccines, which may not only protect the person vaccinated but also lower the rate at which unvaccinated persons becomes infected. A vaccine is *internally* effective if it generates an immune response that prevents a vaccinated person from become ill or infectious. It is *externally* effective to the extent that it prevents transmission of disease to members of the population who are unvaccinated or unsuccessfully vaccinated.

A standard RCT enables evaluation of internal effectiveness, but does not reveal the external effect of applying different vaccination rates to the population. If the experimental group is small relative to the size of the population, the vaccination rate is essentially zero. If a trial vaccinates a non-negligible fraction of the population, the findings only reveal the external effectiveness of the chosen vaccination rate. It does not reveal what the population illness rate would be with other vaccination rates.

The Outcomes Measured in Experiments and the Outcomes of Interest

A serious measurement problem often occurs when studies have short durations. We often want to learn long-term outcomes of treatments, but short studies reveal only immediate outcomes. Credible extrapolation from such *surrogate outcomes* to the long-term outcomes of interest can be highly challenging.

Again, the RCTs for drug approval provide a good illustration. The most lengthy, called *phase 3 trials*, typically run for only two to three years. When trials are not long enough to observe the health outcomes of real interest, the practice is to measure surrogate outcomes and base drug approval decisions on their values. For example, treatments for heart disease may be evaluated using data on patient cholesterol

levels and blood pressure rather than data on heart attacks and life span. In such cases, which occur regularly, the trials used in drug approval only reveal the distribution of surrogate outcomes in the study population, not the distribution of outcomes of real health interest.

Health researchers have called attention to the difficulty of extrapolating from surrogate outcomes to health outcomes of interest. Fleming and Demets (1996), who review the prevalent use of surrogate outcomes in phase 3 trials evaluating drug treatments for heart disease, cancer, HIV/AIDS, osteoporosis, and other diseases, write (p. 605): "Surrogate end points are rarely, if ever, adequate substitutes for the definitive clinical outcome in phase 3 trials."

Conventional Certitudes in the Drug Approval Process

The FDA drug approval process is more transparent than CBO scoring of legislation, the governmental prediction process considered earlier in this paper. The FDA process clearly values credibility, as shown in its insistence on evidence from RCTs and on trial sizes adequate to bound the statistical uncertainty of findings. However, the FDA makes considerable use of conventional certitudes when it attempts to extrapolate from RCT data to predict the effectiveness and safety of new drugs in practice.

The approval process essentially assumes that treatment response in the relevant patient population with be similar to response in the study population. It assumes that response in clinical practice will be similar to response with double-blinded treatment assignment. And it assumes that effectiveness measured by outcomes of interest will be similar to effectiveness measured by surrogate outcomes. These assumptions often are unsubstantiated and sometimes may not be true, but they have become enshrined by long use. Thus, they are conventional certitudes.

I have elsewhere argued that the FDA process should face up to the difficulty of extrapolation and acknowledge that RCTs only partially identify the treatment response that would occur in practice. Pharmaceutical firms or the FDA itself should compute credible bounds on treatment effects, appropriately

reflecting the strength of knowledge. The agency could use these bounds to make approval decisions. (Presently, the FDA uses hypothesis tests, which focus on the study population and entirely ignore the extrapolation problem.) I have shown that one reasonable decision criterion would yield an *adaptive partial drug approval* process in which the agency gives firms limited approval to market new drugs, the extent of approval depending on the strength of the available knowledge of treatment response. See Manski (2009a, 2009b).

5.3. Campbell and the Primacy of Internal Validity

The FDA is not alone in recognizing the statistical uncertainty of experimental findings while abstracting from the identification problems that arise in extrapolation. Elevation of concern with inference in the study population over extrapolation to contexts of policy interest is also characteristic of the social-science research paradigm emerging from the influential work of Donald Campbell.

Campbell distinguished between the internal and external validity of a study of treatment response. A study is said to have *internal validity* if its findings for the study population are credible. It has *external validity* if an invariance assumption permits credible extrapolation. Campbell discussed both forms of validity, but he argued that studies should be judged primarily by their internal validity and only secondarily by their external validity (Campbell and Stanley, 1963; Campbell, 1984).

This perspective has been used to argue for the universal primacy of experimental research over observational studies, whatever the study population may be. The reason given is that properly executed randomized experiments have high internal validity. This perspective has also been used to argue that observational studies are most credible when they most closely approximate randomized experiments.

These ideas have noticeably affected governmental decision making. A prominent case is the FDA drug approval process, which only makes use of experimental evidence. Another is the Education Sciences

Reform Act of 2002 (Public Law 107-279), which provides funds for improvement of federal educational research. The Act defines a scientifically valid educational evaluation to be one that "employs experimental designs using random assignment, when feasible, and other research methodologies that allow for the strongest possible causal inferences when random assignment is not feasible." The term "strongest possible causal inference" has been interpreted to mean the highest possible internal validity. No weight is given to external validity.

From the perspective of policy choice, I think it makes no sense to value one type of validity above the other. What matters is the informativeness of a study for policy making in a population of interest. The credibility of policy analysis as an input to policy choice depends jointly on its internal and external validity.

6. Credible Policy Analysis

This paper has developed a typology of analytical practices that contribute to incredible certitude. The phenomena discussed here—conventional certitudes, dueling certitudes, conflation of science and advocacy, and wishful extrapolation—are common attributes of policy studies. I have presented illustrative case studies that I think to be instructive. Readers may have their own favorite illustrations to offer. Readers may also wish to refine or add to the typology of practices.

I have asserted that incredible certitude is harmful to policy choice, but it is not enough to criticize. I must suggest a constructive alternative. I wrote in the Introduction that an analyst can resolve the tension between the credibility and power of assumptions by posing alternative assumptions of varying credibility and determining the conclusions that follow in each case. I gave an example in Section 3, when I discussed the Manski and Nagin (1998) study of sentencing and recidivism. To reiterate, we implemented a "layered" analysis that began with no assumptions about how judges sentence offenders and then moved from weak,

highly credible assumptions to stronger, less credible ones. We presented several sets of findings and showed how conclusions about sentencing policy vary depending on the assumptions made. Another example of this type of analysis is Manski (1997), which considered use of experimental data to evaluate a preschool intervention.

A researcher who performs an instructive layered policy analysis and exposits the work clearly to policy makers may see himself as having accomplished the objective of informing policy choice. There remains the question of how policy makers may use the information provided. In settings where the policy maker is a planner with well-defined beliefs and social welfare function, decision theory provides an appropriate framework for credible policy choice. Decision theory does not offer a consensus prescription for policy choice with partial knowledge, but it is unified in supposing that choice should reflect the beliefs that the decision maker actually holds. Thus, it does not prescribe incredible certitude.

Economists are most familiar with the Bayesian branch of decision theory, which supposes that beliefs are probabilistic and applies the expected utility criterion. Some policy-choice applications are Meltzer (2001) to medical decision making, Dehejia (2005) to evaluation of anti-poverty programs, and Nordhaus (2008) to assessment of global warming policy. Another branch is the theory of decision making under ambiguity, which does not presume probabilistic beliefs and may apply the maximin or minimax-regret criterion. Some applications are Manski (2006) to police search policy, Manski (2010) to vaccination policy, and Hansen and Sargent (2007) to macroeconomic policy.

There remains an open question of what constitutes effective analysis when policy making is not adequately approximated by decision theory. The psychological-cognitive argument for certitude that I cited in the Introduction views policy makers as so boundedly rational that incredible certitude is more useful than credible policy analysis. I do not find this strong conclusion credible, but I have to acknowledge that it is not refutable with available data. A different question concerns the nature of effective policy analysis in political settings, where multiple agents with differing beliefs and objectives jointly make policy choices.

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