# Bayesian Models and Methods in Public Policy and Government Settings<sup>1</sup>

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*Abstract.* Starting with the neo-Bayesian revival of the 1950s, many statisticians argued that it was inappropriate to use Bayesian methods, and in particular subjective Bayesian methods in governmental and public policy settings because of their reliance upon prior distributions. But the Bayesian framework often provides the primary way to respond to questions raised in these settings and the numbers and diversity of Bayesian applications have grown dramatically in recent years. Through a series of examples, both historical and recent, we argue that Bayesian approaches with formal and informal assessments of priors AND likelihood functions are well accepted and should become the norm in public settings. Our examples include censustaking and small area estimation, US election night forecasting, studies reported to the US Food and Drug Administration, assessing global climate change, and measuring potential declines in disability among the elderly.

*Key words and phrases:* Census adjustment, confidentiality, disability measurement, election night forecasting, Bayesian clinical drug studies, global warming, small area estimation.

## **1. INTRODUCTION AND HISTORY**

Beginning with the posthumous publication in 1763 of the essay attributed to the Rev. Thomas Bayes, and continuing well into the twentieth century, virtually the only approach to statistical inference was the method of inverse probability based on applications of Bayes's theorem (see, e.g., Fienberg, 2006a). Nonetheless, most applications of statistical methods in governmental settings were based primarily on descriptive statistics and there was little debate regarding the relevance of Bayesian approaches in public life despite efforts at implementation, for example, Laplace's development of ratio estimation to estimate the size of the population of France.

Criticism of the method of inverse probability, as Bayesian methodology was known for almost 200 years, began in the mid-19th century with the rise of a philosophical school advocating objective probability. The fundamental concern of the objectivists was the requirement for a prior distribution and they argued for a frequentist view of probability. Unfortunately they failed to present a methodology for inference to counter that of inverse probability and it was not until the work of R. A. Fisher and Jerzy Neyman and Egon Pearson in the 1920s that serious alternative statistical procedures were in place. Neyman's (1934) critique of Gini's version of the representative method for survey taking not only ushered the frequentist repeated sampling perspective into the realm of official statistics, but it also introduced the frequentist tool of confidence intervals and its long-run repeated sampling interpretation (see Fienberg and Tanur, 1996).

Bayesian tools played an important role in a number of statistical efforts during World War II, including Alan Turing's work at Bletchley Park, England, to crack the Enigma code, but with the creation of such frequentist methods as sequential analysis by Barnard in England and Wald in the United States and the elab-

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oration of design-based analyses in sample surveys, as statistics passed the mid-century mark, frequentist approaches were in the ascendancy in the public arena. This was especially true in statistical agencies where the ideas of random selection of samples and repeated sampling as the basis of inference were synonymous, and statistical models and likelihood-based methods frowned upon at best.

With the introduction of computers for statistical calculations in the 1960s, however, Bayesian methods began a slow but prolonged comeback that accelerated substantially with the introduction of Markov chain Monte Carlo (MCMC) methods in the early 1990s. Today Bayesian methods are challenging the supremacy of the frequentist approaches in a wide array of areas of application.

How do the approaches differ? In frequentist inference, tests of significance are performed by supposing that a hypothesis is true (the null hypothesis) and then computing the probability of observing a statistic at least as extreme as the one actually observed during hypothetical future repeated trials conditional on the parameters, that is, a *p*-value. Bayesian inference relies upon direct inferences about parameters or predictions conditional on the observations. In other words, frequentist statistics examines the probability of the data given a model (hypothesis) and looks at repeated sampling properties of a procedure, whereas Bayesian statistics examines the probability of a model given the observed data. Bayesian methodology relies largely upon Bayes's theorem for computing posterior probabilities and provides an internally consistent and coherent normative methodology; frequentist methodology has no such consistent normative framework. Freedman (1995) gave an overview of these philosophical positions, but largely from a frequentist perspective that is critical of the Bayesian normative approach.

The remainder of the article has the following structure. In the next section I give a summary of some of the most common and cogent criticisms of the Bayesian method, especially with regard to its use in a public context. Then in Section 3, through a series of examples, both historical and recent, I argue that Bayesian approaches with formal and informal assessments of priors and likelihood functions are well accepted and should become the norm in public settings. My examples include US election night forecasting, census-taking and small area estimation, studies reported to the US Food and Drug Administration, assessing global climate change, and measuring declines in disability among the elderly. We conclude with a brief summary of challenges facing broader implementation of Bayesian methods in public contexts.

I do not claim to be providing a comprehensive account of Bayesian applications but have merely attempted to illustrate their breadth. One area where Bayesian ideas have made serious inroads, both in theory and in actual practice, but which we do not discuss here is the law (e.g., see Fienberg and Kadane, 1983; Donnelly, 2005; Taroni et al., 2006; Kadane, 2008). The present article includes a purposeful selection of references to guide the reader to some of the relevant recent Bayesian literature on applications in the domains mentioned, but the list is far from comprehensive and tends to emphasize work closest to my own.

## 2. THE ARGUMENTS FOR AND AGAINST THE USE OF BAYESIAN METHODS

Bayesian and frequentist inference in a nutshell: It is especially convenient for the present purposes to think about Bayes's theorem in terms of density functions. Let  $h(y|\theta)$  denote the conditional density of the random variable Y given a parameter value  $\theta$  in the parameter space  $\Theta$ . Then we can go from the prior distribution for  $\theta$ ,  $g(\theta)$ , to that associated with  $\theta$  given Y = y,  $g(\theta|y)$ , by

(1) 
$$g(\theta|y) = h(y|\theta)g(\theta) / \sum_{\theta \in \Theta} h(y|\theta)g(\theta)$$

if  $\theta$  has a discrete distribution,

(2) 
$$g(\theta|y) = h(y|\theta)g(\theta) / \int_{\Theta} h(y|\theta)g(\theta) d\theta$$

if  $\theta$  has a continuous distribution.

Bayesians make inferences about the parameters by looking directly at the posterior distribution  $g(\theta|y)$ given the data y. Frequentists make inferences about  $\theta$ indirectly by considering the repeated sampling properties of the distribution of the data y given the parameter  $\theta$ , that is, through  $h(y|\theta)$ . Bayesians integrate out quantities not of direct substantive interest and then are able to make probabilistic inferences from marginal distributions. Most frequentists use some form of conditioning argument for inference purposes while others maximize likelihood functions. Frequentists distinguish between random variables and parameters which they take to be fixed and this leads to linear mixed models where some of the effects are fixed, that is, are parameters, and some are random variables. For a Bayesian all linear models are in essence random effects models since parameters are themselves considered as random variables. Thus it is natural for a Bayesian to consider them to be independent draws from a common distribution,  $g(\theta)$ , that is, treating them as exchangeable following the original argument of de Finetti (1937). This approach leads naturally to putting distributions on the parameters of prior distributions and to what we now call the hierarchical Bayesian model. It is the normalizing constants [the denominators of (1) and (2)] that are notoriously difficult to compute and this fact has led, in large part, to the use of MCMC methods such as Gibbs sampling that involve sampling from the posterior distribution.

A reviewer of an earlier version of this article suggested that hierarchical models are really not Bayesian, unless one puts a prior at the top level of the hierarchy. This ignores history. As Good (1965) noted, his own use of such ideas draws on work dating back at least to the 1920s and the work of W. E. Johnson whose "sufficientness" postulate implicitly used finite exchangeable sequences. And while non-Bayesians came to recognize the power of such structures many decades later they did attempt to emulate the Bayesian approach, but of course without the clean Bayesian probabilistic interpretation.

Critique of the Bayesian perspective: The most common criticism of Bayesian methods is that, since there is no single correct prior distribution,  $g(\theta)$ , all conclusions drawn from the posterior distribution are suspect. One counter to this argument is that published analyses using Bayesian methods should consider and report the results associated with a variety of prior distributions, thus allowing the reader to see the effects of different prior beliefs on the posterior distribution of a parameter. Others argue that one should choose as a prior distribution one that in some sense eliminates personal subjectivity. Examples of such "objective" priors are those that are uniform or diffuse across all possible values of the parameter, or those that are "informationless." Berger (2006) and Goldstein (2006) presented arguments in favor of the objective and subjective Bayesian approaches in a forum followed by extensive discussion. For a discussion of the fruitlessness of the search for an objective and informationless prior, see the article by Fienberg (2006b).

There are a number of other features associated with the subjective approach including the elicitation of information for the formulation of prior distributions and the use of exchangeability in the development of successive layers of hierarchical models. A number of the examples described in the sections that follow utilize subjective Bayesian features although not always with full elicitation. One characteristic of Bayesian inference that weakens this criticism of the reliance on the prior distribution is that the more data we collect, the less influence the prior distribution has on the posterior distribution relative to that of the data. There are situations, however, where even an infinite amount of data may not bring two people into agreement (see, e.g., Diaconis and Freedman, 1986).

Another aspect of the Bayesian methodology that arises in many applications is the manner in which it "borrows strength" when we are estimating many parameters simultaneously, especially through the use of hierarchical models. This feature, which is usually viewed as a virtue, has also been the focal point of criticism by frequentists. For example, see the commentary by Freedman and Navidi (1986) in the context of census adjustment, in which they critiqued a Bayesian methodology at least in part because it resulted in the use of data from one state to adjust the census-based population figures in other ones. Today, borrowing strength via cross-area regression models is common in frequentist circles, and the Freedman-Navidi argument thus takes on a nonstatistical legal issue rather than a statistical one.

For an interesting dialog on different frequentist perspectives related to statistical inference, see the discussion paper by a group of frequentist statisticians at Groningen University in The Netherlands, Kardaun et al. (2003), which was a response to a series of questions posed by David Cox following a lecture at Groningen. As someone else has noted, it is a rare occasion where frequentists seriously entertain ideas such as those extolled by de Finetti (1937) and attempt to reject them. A number of the questions discussed in this article arise in the context of the examples that follow.

## 3. SMALL AREA ESTIMATION AND CENSUS ADJUSTMENT

*Small area estimation:* As we have already intimated, small area estimation has been a ripe area for Bayesian methods although because so much of the literature has been oriented toward national statistical agency problems, the area is dominated by frequentist techniques and assessments. Surveys conducted by national statistical agencies typically generate "reliable" information either at national or regional levels. But the demand for information at lower levels of disaggregation is sufficiently great and resources tend to be relatively scarce, so that techniques that bolster the sparsity of data at the lower level of disaggregation with data from other sources or from other areas or domains are essential to getting estimates with relatively small standard errors.

The big question is with respect to what distribution are the standard errors computed. There are three different answers depending on one's perspective. Sampling statisticians most often wish to take expectations with respect to the random structure in the sampling design. At the other extreme are Bayesians for whom the variability is an inherent part of the stochastic model structure for the phenomenon of interest, for example, unemployment or crime. And in the middle are model-based likelihood statisticians. My argument is that in the context of small area estimation the designbased statisticians were singularly unsuccessful until they emulated Bayesian ideas of smoothing and borrowing strength, but even then they have insisted on averaging with respect to the sampling design, with arguments about robustness of results.

Jiang and Lahiri (2006) suggested that the problem goes back almost a millennium to the eleventh century, but interest in formal statistical estimation for small areas is a relatively recent phenomenon and much of the recent literature can be traced to a seminal article by Fay and Herriot (1979) who used the James-Stein "shrinkage" estimation ideas to carry out small area estimation in a frequentist manner. Given the close relationship between such techniques and empirical Bayesian estimation (e.g., see Efron and Morris, 1973) and mixed linear models, it is a relatively small leap to the use of fully Bayesian methodology. But the evolution toward such methodology documented by Jiang and Lahiri has been relatively slow and marked by a general resistance in statistical agencies to use models to begin with, let alone Bayesian formulations; for example, see the descriptions of small area estimation methodology in the book by Rao (2003), and contrast it with the Bayesian hierarchical formulations in the work of Ballin, Scanu and Vicard (2005) and Trevisani and Torelli (2004).

*Census adjustment:* What is remarkable about the ascendency of the small area estimation methodology in the United States is that many of those who argued for its use opposed the use of essentially the same ideas for census adjustment for differential undercount in the 1980s and 1990s. The basic component of census adjustment in these debates was the use of the now standard capture-recapture methodology for population estimation (e.g., see Bishop, Fienberg and Holland, 1975, Chapter 6), methodology that has its roots in Laplace's method of ratio estimation. Because a second count

(the recapture) in a census context cannot reasonably be done for the nation as a whole, methods that utilize a sample of individuals were introduced in 1950 and to get small area estimates of population, that is, for every block in the nation, Ericksen and Kadane (1985) proposed the use of a Bayesian regression model for smoothing. Being fully Bayesian was especially important because of the sparseness of the data at their disposal for adjustment, based on a sample from the Current Population Survey. As we noted above, Freedman and Navidi (1986) opposed the use of this methodology as did Fay and Herriot's colleagues at the US Census Bureau, at least in part on its use of models with unverifiable assumptions, and precisely because the shrinkage approach embedded in the methodology borrowed strength across state boundaries to get sufficiently tight estimates of error.

Ericksen, Kadane and Tukey (1989) presented a more refined version of the technical arguments looking back to the 1980 census, as well as ahead to the 1990 census. For the 1990 census, the US Census Bureau essentially proposed the use of a frequentist approach that had similar structure, at least in spirit, to that proposed for 1980, and this was possible only by increasing the size of the sample used for adjustment purposes by an order of magnitude. This plan was opposed largely on political grounds as well as by Freedman and colleagues who continued to object to the role of statistical models in the estimation procedure. A similar controversy ensued as planning for the 2000 census progressed with components for adjustment as well as sampling for nonresponse followup, and ultimately the Supreme Court stepped in and interpreted the Census Act as banning the use of sampling for this purpose. Anderson and Fienberg (1999) and Anderson et al. (2000) provided extensive details on the 1990 and 2000 adjustment controversies. While American politicians have eschewed the use of Bayesian and non-Bayesian adjustment techniques, statistical agencies in several other countries, such as Argentina, Australia and the United Kingdom, have implemented similar methodology, although with little emphasis on its Bayesian motivation.

#### 4. ELECTION NIGHT FORECASTING

In the United States the use of statistical forecasting of election outcomes based on early reported returns began in the early 1950s. The CBS television network employed one of the early computers, the UNIVAC, and the statistician Max Woodbury developed a regression-style model that was used successfully to predict the outcome of the 1952 presidential election. By 1960, computers had become a major tool of the US television networks in support of their election night coverage. Everything was based in some form or another on the 150,000+ precincts where votes were cast across the US, and attention focused on subsets of "key" precincts, chosen in different ways by the three major networks, and on early access to precinct results. The following description draws upon that in the article by Fienberg (2007).

In 1960, the RCA Corporation which owned the NBC television network, hired CEIR, a statistical consulting firm, to develop a rapid election night projection procedure. CEIR consultants included Max Woodbury, and a number of others including John Tukey. Computers were still large, expensive and slow, and much of what Max Woodbury had done for CBS still had to be done by hand. Data of several types were available: past history (at various levels, e.g., county), results of polls preceding the election, political scientists' predictions, partial county returns flowing in during the evening, and complete results for selected precincts. The data of the analyses were, in many cases, swings from sets of base values derived from past results and from political scientists' opinions. It turned out that the important problem of projecting turnout was more difficult than that of projecting candidate percentage. Starting with the 1962 congressional election, Tukey assembled a statistical team to develop the required methodology and to analyze the results as they flowed in on election night. Early members of the team included Bob Abelson, David Brillinger, Dick Link, John Mauchly and David Wallace who joined for the 1964 primaries. From 1962 through 1966, they were consultants to RCA and they interacted with the political scientists and one-time Census Bureau official Richard Scammon who had his own methodology using a collection of key precinct results.

David Brillinger (2002) recalled: "Tukey sought 'improved' estimates. His terminology was that the problem was one of 'borrowing strength." There is a remarkably close resemblance between this methodology and that used for small area estimation. The novel feature in the election night context comes from the nature of the sparsity—because estimation was based on early reported returns. The methodology is now recognizable as hierarchical Bayesian with the use of empirical Bayesian techniques at the top level. Data flowed in with observations at the precinct (polling place) level and were aggregated to county level, and then to the state as a whole. Subjective judgment was used in the choice of the subsets of "key" precincts and prior distributions were typically based on the results of prior state elections with the choice being made subjectively to capture the political scientists' best judgment about which past election most closely resembled the election at hand. As early returns arrived at the computing central command facility, a team of statisticians reviewed the actual distribution of early returns across the state to check for anomalies in light of special circumstances and political practices.

And estimates that really mattered were those at the state level since the model was used for statewide elections for governor and senate positions as well as for presidential elections where state outcomes play a crucial role. Two models were used: one for projecting turnout and the other for projecting the actual percentage difference ("swing") between Democratic and Republican candidates. The occasional rise of serious independent candidates led to model extensions and empirical complications.

Brillinger went on to note: "Jargon was developed; for example, there were 'barometric' and 'swing-ometric' precinct samples. The procedures developed can be described as an early example of empirical Bayes. The uncertainties, developed on a different basis, were just as important as the point estimates." The variance calculations appeared nowhere in the statistical literature and thus they had to be derived and verified by members of the team. This was at about the same time as David Wallace was working with Frederick Mosteller on their landmark Bayesian study of The Federalist Papers, which was published in 1964. Tukey's attitude to release of the techniques developed is worth commenting on. Brillinger recounted how, on various occasions, members of his "team" were asked to give talks and write papers describing the work. When Tukey's permission was sought, his remark was invariably that it was "too soon" and that the techniques were "proprietary" to RCA and NBC. With Tukey's death in 2002, we may well have lost the opportunity to learn all of the technical details of the work done 40 years earlier.

Tukey's students and his collaborators began to use related ideas on "borrowing strength," for example, in the National Halothane Study of anesthetics (Bunker et al., 1969) and for the analysis of contingency table data (e.g., see Bishop, Fienberg and Holland, 1975). All of this before the methodology was described in somewhat different form by I. J. Good in his 1965 book and christened as "hierarchical Bayes" in the classic 1972 paper by Dennis Lindley and Adrian Smith. The specific version of hierarchical Bayes in the election night model remained unpublished, although in an ironic twist, something close to it appeared in a paper written by one of David Wallace's former students, Alastair Scott, and a colleague, Fred Smith (1969, 1971), who were unaware of any of the details of Wallace's work for NBC and who developed their approach for different purposes! Several other hierarchical Bayesian election night forecasting models have now been used in other countries, for example, see the work of Brown, Firth and Payne (1997) and Bernardo and Girón (1992).

The methods described here were in use at NBC through the 1980 presidential elections. Other networks used different methodology and the statisticians who worked for the Tukey team were quite proud of their record of early and more accurate calls of winners than those made by the other networks, especially in close elections. With Reagan's landslide presidential victory in 1980, the results were seemingly better captured by exit polls and from 1982 onward NBC switched to the use of exit polls in competition and then in collaboration with the other television networks. See the article by Fienberg (2007) for further details and a number of the recent controversies regarding exit poll forecasting and reporting.

# 5. BAYESIAN METHODOLOGY AND THE US FOOD AND DRUG ADMINISTRATION

Traditional randomized clinical trials, evaluated with frequentist methodology, have long been viewed as the bedrock of the drug and device approval system at the US Food and Drug Administration (FDA). Over the past couple of decades the drug companies and some members of the US Congress have been critical of the lengthy FDA review processes that have resulted and the enormous expense associated with bringing drugs and medical devices to market. The statistical literature has also produced Bayesian randomized design alternatives (e.g., see Spiegelhalter, Freedman and Parmar 1994; Berry, 1991, 1993, 1997; Berry and Stangl, 1996; Simon, 1999), as well as ethical critiques of traditional frequentist trials (e.g., see Kadane, 1996). Aside from the actual interpretation of the outcomes in a Bayesian framework, these and other authors have argued that the Bayesian approach can provide faster and more useful clinical trial information in a wide variety of circumstances in comparison with frequentist methodology.

Bayesian designs and analyses are part of an increasing number of premarket submissions to FDA's Center for Devices and Radiological Health (CDRH). This initiative, which began in the late 1990s, takes advantage of good prior information on safety and effectiveness that is often available for studies of the same or similar recent generation devices. In 2006, CDRH issued draft guidelines for the use of Bayesian statistics in clinical trials for medical devices (FDA, 2006) and these were finalized in 2010 (FDA, 2010). Previous regulatory guidelines have mentioned Bayesian methods briefly, but this was the first broadly circulated specific document focusing on Bayesian methodologies. The guidelines do, however, place considerable onus on the drug companies who wish to present Bayesian studies, largely because of justifiable concerns over selective use of data from within studies and the reporting of results.

As the guidelines make clear, Bayesian formulations and methods can improve the assessment of new drugs and devices by incorporating expert opinion, results of prior investigations, both experiments and observational studies, and synthesizing results across concurrent studies. There are sections that emphasize the importance of hierarchical models and the different roles for exchangeability, for example, among patients within trials and among trials. We quote from the final guidelines on the role of prior information:

We recommend you identify as many sources of good prior information as possible. The evaluation of "goodness" of the prior information is subjective. Because your trial will be conducted with the goal of FDA approval of a medical device, you should present and discuss your choice of prior information with FDA reviewers (clinical, engineering and statistical) before your study begins.

Possible sources of prior information include:

- clinical trials conducted overseas,
- patient registries,
- clinical data on very similar products,
- pilot studies.

The guidelines go on:

Prior distributions based directly on data from other studies are the easiest to evaluate. While we recognize that two studies are never exactly alike, we nonetheless recommend the studies used to construct the prior be similar to the current study in the following aspects:

- protocol (endpoints, target population, etc.), and
- time frame of the data collection (e.g., to ensure that the practice of medicine and the study populations are comparable).

In some circumstances, it may be helpful if the studies are also similar in investigators and sites. Include studies that are favorable and nonfavorable. Including only favorable studies creates bias. Bias, based on study selection may be evaluated by:

- the representativeness of the studies that are included, and
- the reasons for including or excluding each study.

Prior distributions based on expert opinion rather than data can be problematic. Approval of a device could be delayed or jeopardized if FDA advisory panel members or other clinical evaluators do not agree with the opinions used to generate the prior (pages 22–23).

The FDA guidelines include examples of Bayesian studies that have met agency review standards. Two examples are:

EXAMPLE 1 (T-Scan).<sup>2</sup> T-scan 2000 is a device to be used as an adjunct to mammography for patients with equivocal results. The FDA was presented with an "intended-use" study of 74 consecutive biopsies in Italy. The company combined the results with those from a prospective double blind study at seven centers compared T-scan to T-scan plus mammography for 504 patients, and the results from a "targeted" study of 657 biopsy cases at two centers in Israel using a Bayesian multinomial logistic model. It was able to demonstrate effectiveness in intended use context where there was insufficient information to demonstrate effectiveness. The prior was chosen to smooth the zero counts but to be relatively diffuse. The device was approved for this use as a consequence in 1999.

EXAMPLE 2 (Inter Fix).<sup>3</sup> Inter Fix is an implant device for spinal fusion procedure for patients with degenerative disc disease and back pain. There were data available for 139 patients in randomized clinical trial, with 77 treated and 62 controls. There were also 104 nonrandomized subjects treated. An interim analysis was performed based on a Bayesian predictive model for the future success rate of the device, although most of the other analyses reported appear to be frequentist in nature. The device was approved in 1999 as well.

CDRH statisticians have been exploring and lecturing on important lessons learned in the course of the Bayesian initiative for the design, conduct and analysis of medical devices studies such as the two outlined here.

Although the two studies described above made use of the pooling of evidence, in many ways the key benefit of Bayesian methods is the ability it offers to change the study's course when the welfare of subjects is at stake—using what is known as adaptive randomization. As Don Berry has argued:

In a multiyear frequentist study, new patients will have the same chance of being enrolled in either group, regardless of whether the new or old drug is performing better. This approach can put patients at a disadvantage. A Bayesian model, on the other hand, can periodically show researchers that one arm is outperforming the other and then put more new volunteers into the better arm. (Don Berry quoted in Beckman, 2006)

As is the case in other applications, at the FDA the main criticism of the Bayesian approach is the difficulty associated with the choice of the prior. Spiegelhalter, Freedman and Parmar (1994) stressed the use of different forms of priors such as reference priors, "clinical" priors, "skeptical" priors, and enthusiastic priors. The FDA guidelines clearly argue against "subjective" expert opinion, but as we know from other settings the likelihood function is often at least as subjective as is the prior and hierarchical Bayesian structures impose substantial constraints on the prior and thus the posterior even when one uses "diffuse" distributions on the parameters at the highest levels of the hierarchy! Moreover, when one is drawing upon previous studies, there

<sup>&</sup>lt;sup>2</sup>http://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfTopic/ pma/pma.cfm?num=p970033.

<sup>&</sup>lt;sup>3</sup>http://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfTopic/ pma/pma.cfm?num=p970015.

is always an issue of how much "weight" these should receive in the prior, especially if the previous studies did not involve randomization as in Example 2.

Unfortunately, as these ideas move to other parts of the FDA they are not without controversy. While we were completing this article, a new controversy over a specific drug made news. Vasogen Inc. announced that on Friday, March 14, 2008 it had an initial teleconference with the FDA to discuss and clarify the recent FDA comments regarding the use of a Bayesian approach for ACCLAIM II, a clinical trial which is being planned to support an application for US market approval of the Celacade<sup>TM</sup> System for the treatment of patients with New York Heart Association Class II heart failure.<sup>4</sup> Oversight of the drug approval had shifted from CDRH—which had issued the guidelines for use of Bayesian methods-to the FDA Center for Biologics Evaluation and Research (CBER), which has adopted a far more cautious approach. How such issues will work themselves out remains to be seen.

Another place at the FDA where Bayesian methodology has recently come into vogue is in the postapproval surveillance of drugs and devices, especially with regard to side effects. DuMouchel (1999) discussed hierarchical Bayesian models for analyzing a very large frequency table that cross-classifies adverse events by type of drug used. Madigan et al. (2010) described a more elaborate, large-scale approach to the analysis of adverse event data gathered via spontaneous reporting systems linked to claims databases.

It is worth noting that Bayesian methods have been used in innovative ways to study the combination of evidence across studies on matters directly before the FDA. On the advice of an expert panel, the FDA in 2004 put a "black-box" warning-its highest warning level-on antidepressants for pediatric use especially among teenagers. The panel's advice was based not on actual suicides, but on indications that suicidal thoughts and behaviors increased in some children and teens taking newer selective serotonin reuptake inhibitor (SSRI)-type antidepressants. Kaizar et al. (2006) later addressed the combination of evidence using a hierarchical Bayesian meta-analytical approach. They concluded that the evidence supporting a causal link between SSRI-type antidepressant use and suicidality in children is weak. This will clearly be evidence that the FDA will need to consider when it next reviews this issue, as it surely will, because of subsequent observational studies that suggest teen suicides

have increased considerably despite a substantial decrease in the use of antidepressants (e.g., see Gibbons et al., 2007).

Finally we note the extensive applications of a range of Bayesian methods in the related matters of health technology assessment as described by Spiegelhalter et al. (2000) and Spiegelhalter (2004).

## 6. CONFIDENTIALITY AND THE RISK-UTILITY TRADE-OFF

Protecting the confidentiality of data provided by individuals and establishments has been and continues to be a major preoccupation of statistical agencies around the world. Over the past 30 years, statisticians within and outside a number of major agencies have worked to cast the confidentiality problem as a statistical one, and over the past decade this effort has taken on substantial Bayesian overtones as the focus has shifted to the trade-off between risk associated with protection of confidentiality and the utility of databases for different kinds of statistical analyses. See the articles in the book by Doyle, Theeuwes and Zayatz (2001) for a broad review of the literature as it stood about a decade ago.

Some of the earlier confidentiality literature focused on the protection of data against intruders or "data snoopers" and Fienberg, Makov and Sanil (1997) proposed modeling intruder behavior (and thus protection against it) using a subjective Bayesian "matching" model; cf. the discussion of Bayesian "matching" methods in the book by D'Orazio, Di Zio and Scanu (2006). In 2001, Duncan et al. suggested a Bayesian approach to the risk–utility trade-off problem, which was later generalized in the context of a formal statistical decision theory model by Trottini and Fienberg (2002) and implemented in illustrative form by Dobra, Fienberg and Trottini (2003) in the context of protecting categorical databases.

More recently, Ting, Fienberg and Trottini (2008) contrasted their method of random orthogonal matrix masking with other microdata perturbation methods, such as additive noise, from the Bayesian perspective of the trade-off between disclosure risk and data utility. This work has yet to be adopted by statistical agencies, but related Bayesian modeling in the same spirit by Franconi and Stander (2002), Polettini and Stander (2004), Rinott and Shlomo (2007) and Forster and Webb (2007) has been done in close collaboration with those in agencies in Israel, Italy and the United Kingdom.

One other Bayesian approach to confidentiality protection which has already seen successful penetration

<sup>&</sup>lt;sup>4</sup>FDA deals blow to Vasogen's heart treatment, Reuters, March 3, 2008.

into US statistical agencies is based on the method of multiple imputation approach due originally to Donald Rubin and proposed by him for application in the context of protecting confidentiality in 1993. See the article by Fienberg, Makov and Steele (1998) for a related proposal. The basic idea is simple although the details of the implementation can be complex. We want to replace the actual confidential data by simulated data drawn from the posterior distribution of a model that captures the relationships among the variables to be released. Since these "sampled units" are synthetic and do not actually correspond to original sample members, proponents claim that the resulting data protect confidentiality by definition-others point out that synthetic people may be close enough to "real" sample members for there still to be problems of possible reidentification. The method of multiple imputation allows one to generate multiple synthetic (imputed) samples from the posterior and to use these samples to produce estimates of variability that have a frequentist interpretation. Raghunathan, Reiter and Rubin (2003) and authors of a number of subsequent articles described the formalisms of the methodology as well as extensions involving only partially imputed data. Because statistical agencies in the US were already experimenting with multiple imputation to deal with missing value problems, a number of them have recently experimented with this technology for confidentiality protection as well. Since the methodology works for fairly general classes of prior distributions it could utilize, at least in principle, prior information from multiple sources as well as expert judgment.

#### 7. CLIMATE CHANGE AND ITS ABATEMENT

By now there is hardly a literate person who has not heard about global warming and the dire consequences predicted if we do not change our behavior regarding the emission of greenhouse gases and aerosols. The following statements are typical and come from a report to the US Senate by Thomas Karl (2001), a senior official in the National Oceanic and Atmospheric Administration:

- The natural "greenhouse" effect is real, and is an essential component of the planet's climate process.
- Some greenhouse gases are increasing in the atmosphere because of human activities and increasingly trapping more heat.
- The increase in heat-trapping greenhouse gases due to human activities are projected to be amplified by feedback effects, such as changes in water vapor, snow cover, and sea ice.

- Particles (or aerosols) in the atmosphere resulting from human activities can also affect climate.
- There is a growing set of observations that yields a collective picture of a warming world over the past century.
- It is likely that the frequency of heavy and extreme precipitation events has increased as global temperatures have risen.
- Scenarios of future human activities indicate continued changes in atmospheric composition throughout the 21st century.

These and similar conclusions have been shared with the public by the Intergovernmental Panel on Climate Change (IPCC) and the US National Academy of Sciences–National Research Council through a series of committee reports. Many of the statements are backed up by elaborate statistical assessments and modeling and over the past decade this work has taken on an increasingly Bayesian flavor. There have also been challenges to many of these statements, despite what the "global warming" proponents describe as increasingly strong empirical support. See, for example, the report by Wegman, Scott and Said (2006) for a statistical critique of some recent modeling efforts.

In Figure 1 we reproduce an example of the temperature reconstruction for the past 2000 years based on multiple sources prepared by a panel from the National Research Council (2006); see also National Academy of Sciences (2008). One thing that is obvious from this figure is the convergence of the data sources for the past 150 years, from the start of the industrial revolution, showing temperatures increasing substantially throughout recent times—this is global warming! What is also clear is the uncertainty associated with these reconstructions going back further in time—this is indicated by the shading in the background of the figure, with darkness associated with greater uncertainty; cf. the article by Chu (2005).

The precise trajectory of the recent increases in temperature clearly has substantial uncertainty across the data sources and models and it would surprise few of us to learn that projections from these data can vary dramatically. This has recently been the focus of intensive Bayesian analysis by a number of authors around the world; see, for example, the articles by Min and Hense (2006, 2007), and especially work in the United States by Berliner, Levine and Shea (2000), Tebaldi et al. (2005) and Sanso, Forest and Zantedeschi (2008).

Tebaldi, Smith and Sansó (2010) described a way to combine an ensemble of computer simulation model

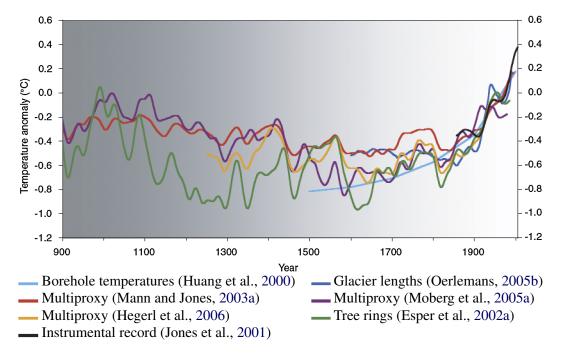


FIG. 1. Smoothed reconstructions of large-scale (Northern Hemisphere mean or global mean) surface temperature variations from six different research teams are shown along with the instrumental record of global mean surface temperature. Source: Figure S-1, National Research Council (2006), page 2. Reproduced with permission.

results and projections and actual observations via hierarchical modeling in order to derive posterior probabilities of temperature and precipitation change at regional scale. They considered the ensemble of computer models as being drawn from a superpopulation of such models, and used hierarchical Bayesian models to combine results and compute the posterior predictive distribution for a new climate model's projections along with the uncertainty to be associated with them. For a related discussion about assessing the uncertainties of projections, see the article by Chandler, Rougier and Collins (2010).

Whether in the context of this work, or in many other efforts to forecast future temperatures, Bayesian and non-Bayesian, almost all modeling efforts agree that temperatures will continue to rise. Where the principal disagreements come in is "by how much" and "what would be the impact by various strategies for abatement."

It is worth noting that subjective Bayesian methods were proposed for use in climate modeling as early as 1997 by Hobbs and the prominence of Bayesian arguments is due not only to statisticians working in this area but also to climate modeling specialists such as Schneider (2002), who has noted:

For three decades, I have been debating alternative solutions for sustainable development with thousands of fellow scientists and policy analysts—exchanges carried out in myriad articles and formal meetings. Despite all that, I readily confess a lingering frustration: uncertainties so infuse the issue of climate change that it is still impossible to rule out either mild or catastrophic outcomes, let alone provide confident probabilities for all the claims and counterclaims made about environmental problems.

Even the most credible international assessment body, the Intergovernmental Panel on Climate Change (IPCC), has refused to attempt subjective probabilistic estimates of future temperatures. This has forced politicians to make their own guesses about the likelihood of various degrees of global warming. Will temperatures in 2100 increase by 1.4 degrees Celsius or by 5.8? The difference means relatively adaptable changes or very damaging ones...

So what then is "the real state of the world"? Clearly, it isn't knowable in traditional statistical terms, even though subjective estimates can be responsibly offered. The ranges presented by the IPCC in its peerreviewed reports give the best snapshot of the real state of climate change: we could be lucky and see a mild effect or unlucky and get the catastrophic outcomes.

The IPCC assessment builds on formal and informal use of subjective assessments of the evidence. There is in fact now a tradition in this field of expert elicitation of expert judgments; for example, see the articles by Morgan and Keith (1995), Keith (1996) and Zickfeld et al. (2007).

#### 8. DISABILITY AMONG THE ELDERLY

In the United States, there are no official government surveys of disability and how it is changing over time, but the National Institute on Aging (NIA) has funded, with support of other government agencies, two major longitudinal surveys that capture information on disability and link it to other data-the Health and Retirement Survey (HRS) and the National Long Term Care Survey (NLTCS). The original cohort for the NLTCS was surveyed in 1982 and there have been subsequent waves in 1984, 1989, 1994, 1999 and 2004. The NLTCS has been managed by a university-based organization since the late 1980s, but actual data collection has been carried out by the US Census Bureau. Considerable interest in the NLTCS has focused on a series of measures of disability know as "Activities of Daily Living" (ADLs) and "Instrumental Activities of Daily Living" (IADLs), especially for those in the sample exhibiting some dimension of disability on a screener question. Erosheva, Fienberg and Joutard (2007) studied a cross-sectional version of 16 binary ADLs and IADLs, represented in the form of a  $2^{16}$  contingency table using a Bayesian latent variable model that was developed to be an analogue to the frequentist Grade of Membership (GoM) model of Manton, Woodbury and Tolley (1994), the likelihood function for which is notoriously problematic.

The Bayesian version of the GoM model utilizes hierarchical modeling ideas through a layered latent variable structure. Let  $x = (x_1, x_2, ..., x_J)$  be a vector of binary manifest variables. The GoM model is structured around *K* mixture components (extreme profiles), and it assigns to each individual a latent partial membership vector of *K* nonnegative random variables,  $g = (g_1, g_2, ..., g_K)$ , whose components sum to 1. By assigning a distribution D(g) to the vector *g* and integrating, we obtain the marginal distribution for individual response patterns in the form of individual-level mixtures. Erosheva, Fienberg and Joutard explained how to fit this Bayesian GoM model using MCMC techniques and apply it to the data in the  $2^{16}$  contingency table displaying outcomes on the 16 ADLs and IADLs, treating these different measures of disability as exchangeable, and thus as if they were independent and drawn from another common distribution. Airoldi et al. (2007, 2010) explored related aspects of model specification and model choice. As with a number of the earlier examples, the hierarchical latent structure embedded in this modeling approach is a mechanism for gaining control over what might otherwise be an unmanageable number of parameters and essential to the success of the related methods.

This work on disability opens the door to a number of challenging problems for the Bayesian modeling community. For example:

- How should a Bayesian working with hierarchical models such as the Bayesian GoM model incorporate the survey weights that arise from the sampling scheme of the survey and adjustments for nonresponse? There is now an extensive literature that provides conflicting advice on the use of survey weights in the Bayesian framework, but the hierarchical model complexities bring these issues into somewhat sharper focus in this setting; for example, see the contrasting arguments of Fienberg (2009) and Little (2009).
- Manrique-Vallier and Fienberg (2010) extended these ideas to longitudinal latent profiles applied to the six ADLs measured across all six waves of the survey, and Manrique-Vallier (2010) added in survival and generational effects to address the question of whether disability is increasing or decreasing over time. He appeared to be able to capture characteristics that others have addressed using comparisons across cross-sections for each wave of the survey (see, e.g., Manton and Gu, 2001; Manton, Gu and Lamb, 2006). Scaling these methods up to the full array of ADLs and IADLs with key covariates remains a major challenge. This is a matter of considerable interest to policy planners who are interested in forecasting future demands on the health-care infrastructure as a result of changes in long-term disability over time.

The Bayesian GoM model is a special case of a much larger class of mixed membership models that can be used to analyze a diverse array of data types ranging from text in documents to images, to linkages in networks, and longitudinal versions may prove applicable in other settings beyond the study of disability.

### 9. CONCLUSION

For much of the twentieth century, approaches to the design and analysis of statistical studies in government settings and public policy were almost exclusively descriptive or dominated by the frequentist approach that followed from the work of Fisher and from Neyman and Pearson. With the neo-Bayesian revival of the 1950s, Bayesian methods and techniques slowly began to appear in the public arena, and their use has accelerated dramatically during the past two decades, especially with the rise of MCMC methods that have allowed for the sampling from posterior distributions in settings involving very large datasets.

In this article, we have attempted to give some examples, both old and new, of Bayesian methods in statistical practice in government and public policy settings and to suggest why in most of the cases there was ultimately little or no resistance to the Bayesian approach. Our examples have included census-taking and small area estimation, US election night forecasting, studies reported to the US Food and Drug Administration, assessing global climate change and measuring declines in disability among the elderly. Their diversity suggests that there is growing recognition of the value of Bayesian results, and a realization that the approach deals directly with questions of substantive interest.

Where there has been controversy, it has largely focused on the role of the choice of prior distributions and the appropriateness of "borrowing strength" across geographic boundaries. Arguments in favor of the use of "objective" priors have done little to stem the frequentist criticism of Bayesian methods, and typically ignore the highly subjective aspects of elements on hierarchical structures and likelihood functions. Through the examples discussed here, we have tried to convey the fact that a pragmatic Bayesian approach inevitably includes many subjective elements, although prior distributions may well draw on data from related settings and have an empirical flavor to them. Nonetheless, the principal challenge to Bayesian methods that remains is the need to constantly rebut the notion that frequentist methods are "objective" and thus more appropriate for use in the public domain.

In other areas of statistical application Bayesian methodology has also seen a major resurgence and this is especially true in connection with machine learning approaches to very large datasets, where the use of hierarchically structured latent variable models is essential to generating high-quality estimates and predictions.

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