May 16, 2018

<u>**Via Email**</u>

RE: Suggestions for Short-Term Priorities on the President's Management Agenda Goal to Leverage Data as a Strategic Asset

Mr. Belur, Ms. Kelley, Mr. Wilmer, Ms. Kent, and Ms. Potok:

Last month the Bipartisan Policy Center and the Council of Professional Associations for Federal Statistics launched a Federal Data Working Group that includes representation from across a wide range of the evidence-building community, stakeholders from the open government and open data communities, and private sector. On behalf of the working group, we appreciate recent efforts to prioritize a data strategy as part of the President's Management Agenda and look forward to serving as a resource for you in formulating the strategy.

In the short-term, we recognize there are a series of actions that can be undertaken to begin achieving the goal of a longer-term strategy. This letter offers six suggestions from the Federal Data Working Group about needs and priorities that your teams could prioritize.

- **Clarifying Guidance.** OMB's M-13-13 guidance started a meaningful process of developing data inventories in Federal agencies. We recognize the value of such inventories for addressing numerous priorities and goals that align with the PMA, including acknowledging what data are available in order to improve both access and use. Beyond the existing guidance, OMB could choose to issue clarifying guidance about what is intended for "data asset," what "ownership" means for agencies that routinely share datafiles, elaborate on classification domains, and to more clearly delineate the value of inventories for agencies to achieve better data management, transparency, research use, and other evidence-building activities.

- **Updated Examples of Secure Data Sharing.** While our working group understands the implicit value in uses of data and efforts to link datasets for analyses or make public use datafiles, the value proposition is sometimes less certain for the public writ large. We encourage OMB to continue to identify and promote new and recent successes of data sharing activities that lead to real and meaningful public policy actions. For example, the director of the National Center for Health Statistics, Charlie Rothwell, recently described that by linking NCHS data on blood lead levels to information about public housing, the Departments of Housing and Urban Development and Health and Human Services were able to jointly identify substantial public health benefits that had not otherwise been detected for HUD programs. These types of examples make clear the value proposition of the data strategy and the PMA goal, while simultaneously contributing to public awareness about secure and effective data linkages that can build public trust. We encourage OMB to work with agencies to routinely identify new and emerging use cases that can be publicly disseminated.

- **Data Standards for Combining Data.** We strongly support OMB's existing efforts to develop new data standards for combining data across agencies and jurisdictions. We encourage OMB to consider how that National Information Exchange Model (NIEM) and common business entity identifiers may be applicable to such efforts in the short-term.

- **Implementation of the Foundations for Evidence-Based Policymaking Act.** Our working group remains optimistic that the Foundations for Evidence-Based Policymaking Act will become law in the near future. Many aspects of that law may also be appropriate activities for OMB to begin consideration of under the PMA data strategy, including additional efforts on data inventories, improving metadata standards, strengthening de-identification protocols, and encouraging the availability of administrative data for statistical activities when not otherwise prohibited by law.

- **Governance of Federal Statistical Research Data Centers (FSRDCs).** The FSRDCs currently provide a valuable resource for researchers inside and outside government to access and use confidential data for statistical activities in a secure environment. Targeted modifications could be made in the near-term to improve the accessibility of FSRDCs for access and use by evaluators, with specific improvements for the governance processes. We encourage OMB to begin a process by which the governance processes can be strengthened for such purposes with a particular focus on improving the customer experience for evaluators.

- **Developing Common Terminology.** The many communities who work with a range of data often use slightly different terminology to describe common concepts. We encourage OMB to use the data strategy as a mechanism for identifying the commonalities across fields to help federal agencies, and state agencies implementing federal programs, communicate and collaborate. For example, mission support data may also be thought of as operational information, such as financial or human resources data. Mission program data may also be thought of as administrative data or administrative records. And statistical data can be thought of as records controlled within the federal statistical agencies or collected through statistical surveys under a pledge of confidentiality.

Again, we appreciate your attention to improving the federal government's data infrastructure as part of the PMA and look forward to providing assistance as needed moving forward. If you have any questions about this letter or the suggestions, please contact Nick Hart, director of the Bipartisan Policy Center's Evidence-Based Policymaking Initiative, or John Thompson, Executive Director of the Council of Professional Association for Federal Statistics.

Regards,

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Appendix: Federal Data Working Group Membership

- Rachel Anderson, Data Quality Campaign
- Michael Davern, NORC
- Brian Harris-Kojetin, National Academies CNSTAT
- Nick Hart, Bipartisan Policy Center (co-chair)
- Christian Hoehner, Data Coalition
- Chris Hooton, Internet Association
- Bruce Meyer, University of Chicago
- Joshua New, Center for Data Innovation
- Amy O'Hara, Stanford University
- Steve Pierson, American Statistical Association
- Robert Shea, Grant Thornton
- Michael Strain, American Enterprise Institute
- John Thompson, COPAFS (co-chair)