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Comments Regarding the Federal Data Strategy Year-1 Action Plan

The Federal Data Strategy Draft Year-1 Action Plan is bold and ambitious. However, there appear to be elements of the Action Plan that place the cart before the horse which could jeopardize achievement of the goals and metrics established by the Action Plan. For example, Action 13, to conduct an initial maturity assessment, should be highly prioritized because it will establish the baseline understanding of the federal workforce's skills, knowledge, and data literacy. Actions 2, 12, and 14 also require immediate focus and consideration because they represent foundational elements of the Strategy. Without a primary focus on workforce baseline knowledge, literacy, and skills around data, Agencies will be unable to implement other important areas of the Strategy, especially on the timelines presented. It is for that reason that SEA's perspective is that these areas should take priority over other elements mentioned. Furthermore, the baseline assessments captured by Actions 13 and 14 appear absolutely critical to the government's long term success in moving the overall Strategy forward. All federal employees, including senior executives, do not need to be data experts nor data scientists, but they do need enough knowledge to ask the right questions. None of the more advanced tasks envisioned by the Strategy can scale to the enterprise effectively without raising the workforce's data knowledge baseline, which will require constant and ongoing investments in employee learning and technology. The government needs to build curiosity and instill a growth mindset among its workforce, which leads to asking important questions about how data can be used internally and across different entities. In order for this Strategy to be effective, employees must be empowered to use data, technology, their skillsets, and their knowledge rather than having another OMB mandate thrust upon them without connecting its importance to the mission they serve or being given the tools and infrastructure to succeed.

Workforce Training

Developing and sharing resources and/or tools is a much needed area of focus, yet resources cannot simply be distributed to a silo of the workforce or to types of employees. Even within functional silos, information seldom flows effectively downwards within federal organizations. It is necessary to ensure the entire workforce is aware of the resources that are developed, and how they can help employees accomplish their jobs. How will agencies better work across silos, across departments? There can often be legal (authorizing/appropriation) barriers to effective interagency coordination, and the interagency-

agreement process can be complex and overly onerous for the purposes of the Strategy. SEA encourages consideration of this point.

Action 1

The E-Government Act of 2002 created the CIO Council, chaired by the OMB Deputy Director for Management to serve as an interagency support center for federal information resources. While the OMB Data Council appears to be a good idea, without more specific direction it risks being a redundant council that fails to coordinate with other existing efforts by the CIO Council. The Strategy should clarify how the Data Council will differ from the CIO Council and how all the various CXO Councils will work together. SEA recommends that the OMB Data Council and the CIO Council be linked to achieving a few (perhaps 3) specific cross-departmental missions of importance, such as training assistance for new jobs, cost reduction in healthcare, and ease of attaining government services.

Action 2

Development of a shared, government wide catalog of data-related training and credentialing information is to be commended. Yet this resource cannot be provided to federal employees passively with the expectation that employees will use it or understand how this fits into their current role, let alone the future of work. The government needs to take proactive measures to increase baseline data literacy across the entire enterprise (collected through Action 13, and periodically revisited), and should leverage behavioral science (including offices focused on behavioral science) to make this transition. This will allow employees to not only understand the data and technology, but also understand how it aids their work and the mission of the Agency.

It is unclear how this new curated catalog of training offerings in data science will overlap with other certifications, such as certifications regarding the security or privacy of data or the use of data to train Artificial Intelligence. The government should also ensure it is not reinventing the wheel and should look to publicly available and credible standards, credentials, etc. wherever possible.

Simply counting the number of agencies and employees using the catalog is a fine metric for the short term; but, it is wholly inadequate in the long term. The appropriate metric should be evidence that behavior is being changed as a result of improved data training and literacy (could be measured via Kirkpatrick evaluation). This view concurs with our original position that elements of this plan, such as measurement, ought to focus more on how the workforce practically implements and builds upon these strategies and not simply how the general goal is attained. It is the workforce centered mindset which views employees as investments and assets rather than a count or metric that is shown consistently to yield long term success.

Action 3

This Action establishes an ambitious goal of creating one ethical framework for the entire U.S. government. The current Strategy presents no option for reforming the ethical framework over time nor an option for creating a mission specific ethical framework for different agencies. GSA is removed from

the missions of various departments and agencies, meaning this ethical framework would attempt a “one size fits all” approach. But that approach rarely works when considering the diverse missions and principles existing across the federal government. SEA recommends different ethical frameworks for different types of agencies, for example, perhaps one for civilian agencies, one for law enforcement agencies, and one for Title 10 (defense) and Title 50 (national security) agencies, etc. This at least allows GSA to consider the unique ethical considerations of different entities.

Furthermore, ethical considerations change over time. Unlike morals, which present a clear distinction between right and wrong, ethics vary over time as new social norms and technological capabilities are established. The Strategy should present a continuous process for assessing ethical considerations rather than a static one.

Action 4

Once again this Action seems to lack consideration of specific mission deliverability. While it is important to work toward protecting data from re-identification, there is a lack of research that as techniques advance re-identification of data will be possible even with minimal data elements. A better approach may be to establish an initiative where individuals can "opt-in" to having their data - anonymized to the best degree possible - used for open data initiatives. If the individuals don't opt-in, their data cannot be used even in attempted anonymized form.

Action 5

A government wide repository for Federal Data Strategy Resources and Tools is necessary. However, building the toolshed is only the starting point. GSA should offer 'librarians' to help federal employees and agencies find the information they need within the database. Navigating this system alone with an inadequate baseline of knowledge could be incredibly frustrating and disengaging to employees. GSA could also replicate the practices of DigitalGov, which include listservs, newsletters, in-person training, and community building opportunities, etc. GSA or agencies could cultivate train the trainer programs or communities of practice to leverage existing knowledgeable employees to work with their peers to build skills through action learning projects.

Priorities for the repository should replicate the priorities of the OMB Data Council as discussed in Action 1 recommendations.

Action 6

Developing a standard application for external researchers to access federal datasets and other information that agencies have already collected is a good idea.

Actions 7 and 8

Data.gov still has a lot of PDF'ed data sets, it would be helpful to understand the priority level of transforming the information contained in the PDFs into data ranks against the development of an automated tool. Protecting individual data should be a top priority for the Strategy. These elements

must address the question- how do individuals know that government isn't re-purposing their anonymized data in ways they never gave fully informed consent for? Perhaps it is better to establish an initiative where individuals can "opt-in" to having their data - anonymized to the best degree possible - used for open data initiatives. If the individuals don't opt-in, their data can't be used even in attempted anonymized form.

Action 9

See concerns raised in Action 4.

Action 10

SEA requests that the Strategy clarify whether data obtained as part of the plan regarding federal payments, grants, and IT spending will be made available to the public and posted on data.gov.

Action 11

SEA encourages the Strategy makers to consider the existing [Open Geospatial Consortium's standards](#) when requesting new, improved standards for geospatial data.

Action 12

The one-month timeframe presented for establishment of agency diverse data government management boards is very ambitious and unrealistic. Many agencies operate in strong silos; bridging gaps across agency business units, supporting functions, and other key officials, and selecting the right individuals for the governance boards, may be easier said than done. Moreover, the Strategy will be meaningless without robust inclusion of agency program offices. Programs receive authorization and appropriations and, therefore, often lack incentives to adhere to agency central-management efforts when their needs are not adequately being considered or included. One strategy to reverse this trend is to use the data governance body as also a senior leader learning, networking, and collaboration forum. Few agencies have effective cross-agency executive networks, therefore strengthening bonds and fostering shared learning experiences among senior agency leaders, both career and non-career, can help build a common data-centric culture and drive movement on other elements of the Strategy.

It is also unclear how these management boards will interact with the OMB Data Council, the CIO Council, or other CXO Councils. Without clarified roles amongst these groups the possibility for redundancy is high.

Action 13

The timelines on several other Actions will be challenging if agencies do not already have a baseline understanding related to the maturity of data literacy, use, governance, etc. within their organization. This seems like a critical and foundational Action; ensuring the guidance and assistance provided to agencies is robust and meaningful will be critical to overall success of the Strategy meeting its aggressive implementation goals. Agencies should also receive clarity in this strategy regarding how this

assessment will overlap and connect with IT Modernization efforts and efforts of the CIO Council, in addition to other elements of the President's Management Agenda focused on the workforce.

Action 14

Again, this Action is foundational. The Strategy will only be as successful as the federal workforce is capable to execute it. Employee learning and development in this area must be funded and prioritized, or it simply will not happen. While the federal workforce is generally highly educated, often with advanced degrees, the knowledge and skills employees have could be out of date or highly functionally-specific. The focus should be on learning and educational opportunities that can ensure all employees understand foundational areas of knowledge related to data, its collection and use. Without such a foundation, leaders relying on dashboards and other data aggregating tools without understanding the underlying data could end up making poor decisions.

In order to truly understand all opportunity areas, agencies should first post – in an open forum- what their missions are and then engage in collective deliberation with the public and private sector on how use of data could improve the delivery of their missions. This "crowdsourcing" could then inform both the needed data skills - which will continue to change over time - and data needs to deliver diverse missions.

Action 15

See concerns and recommendation for Action14.

Action 16

How do Open Data sets differ from the efforts to improve data resources for AI Research and Development with Action 9? Also, for all of these data efforts - at no point was a mechanism identified whereby an individual can petition the U.S. government to detail what data they have collected about them and engage a mechanism to either "opt-out" of use of that data or correct the data if it is incorrect? Like the credit bureaus, it would seem the U.S. government needs a mechanism to allow individuals "opt-out" of use of that data for open data purposes, use for AI purposes, or correct the data if it is incorrect.

Concluding Thoughts

Ensuring the success of the Federal Data Strategy requires serious, consistent and long-term investment in federal employees and their capabilities with data. The best laid plans and policies will amount to little if insufficient attention is paid to the workforce. SEA stands ready to work with the Administration and stakeholders to ensure the federal workforce has the skills and knowledge necessary to maximize data in service of agency missions and the American people.