November 20th, 2018

Re: Federal Data Strategy Draft Practices

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

The Council of Professional Associations on Federal Statistics (COPAFS) represents researchers, educators, public health officials, civic groups and businesses that rely on quality and accessible statistics that can only be effectively collected by the Federal Government. On behalf of our members, we would like to express our appreciation for the attention being paid to federal data in the President's Management Agenda, and the care being taken to include stakeholders as you develop a national data strategy.

The principal statistical agencies are a crucial part of our national data infrastructure. They are experts in transforming data into accurate and timely statistical information that both public and private decision makers rely on. We are making three recommendations, based on lessons learned from the statistical system on how best to leverage data as a strategic asset, that are consistent with the draft practices identified by your group. We hope these recommendations will help to inform your Year One action plan.

**Recommendation:** Begin the work to establish a national secure data service, as suggested by the Commission on Evidence-based Policymaking (CEP).

The draft practices attempt to balance data security (#15) with making data as open and accessible as possible (#13). This same challenge was addressed by the CEP in 2017, which ultimately recommended the establishment of a national secure data service that facilitates data access while ensuring privacy.[1] COPAFS believes the Commission's recommendation is the best way to meet security needs while making data more accessible to the evidence-building community.

**Recommendation:** As agencies prepare to share more of their data across the federal system, ensure that non-statistical data meet standards established by the Federal Committee on Statistical Methodology (FCSM) for data quality so they can be used in the production of clear, meaningful, and transparent statistics.

Data sharing and access to administrative data are key parts of modernization efforts in the principal statistical agencies, as traditional survey methods become increasingly expensive and burdensome. However, these types of data linkages can present their own challenges. While the non-statistical data from within the Federal Government can be used for statistical information and analysis, these data often fall short of OMB statistical policy directives, undermining the quality of statistics produced by our federal agencies.

To address those challenges, the Interagency Council on Statistical Policy, along with the Federal Committee on Statistical Methodology, is developing a data quality framework for use of

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[1] CEP, 2017, p. 40

non-statistical data. The draft practices that seek to improve data sharing, supported by practices such as creating a culture of sharing data (#19) and facilitating sharing across federal agencies (#20), will be most beneficial to our national data assets if program agencies meet the meta- and para-data standards necessary for statistical agencies to produce accurate, timely and relevant statistics.

Ongoing, formal consultation with the FCSM on these standards will ensure that data sharing efforts will result in the maximum benefit to data users both inside and outside of government.

**Recommendation:** Provide Congress with a long-term, transparent budget with sufficient funding to support these initiatives in the long term.

As you consider your implementation plan, it is important that agencies have sufficient funding to make these immediate changes and improvements as well as ongoing funding to maintain these data assets.

These suggested practices will improve governance and policymaking by helping the evidence-building community understand policy needs, and therefore are a means to make government spending more efficient. However, they require a significant upfront investment in order to make improvements to IT, increase staff capacity, and support activities like building a data inventory. Additionally, many of these practices represent new responsibilities for many agencies. They will require ongoing funding to support those efforts and therefore buy-in from Congressional appropriators and authorizers.

While there may be current funding from OMB to execute the short-term goals in the President's Management Agenda, the long-term nature of this plan means it will be necessary to work with Congress to ensure funding will be there to support the national data strategy well past this current administration. We believe that a transparent and long-term budget will help ensure the longevity of these efforts with Congress.

Overall, we are very excited at the progress being made to improve the national data infrastructure. We look forward to continuing to engage with your group as your work moves forward.

If you have any questions about these recommendations, please contact Corinna Turbes, corinna.turbes@copafs.org.

Sincerely,

Corinna Turbes
Associate Director of Policy Analysis
Council of Professional Associations on Federal Statistics