

Revising the Principles for a Comprehensive Federal Data Strategy Based on Public Input

On June 27, 2018, the Department of Commerce published a Request for Comments (RFC) in the Federal Register which included a set of draft Principles for a comprehensive data strategy and asked the public to “review and provide feedback on their clarity, appropriateness, completeness, and potential duplications.” The public also submitted comments at strategy.data.gov, the Federal Data Strategy website. The RFC closed on July 27th and the website closed to comments on July 30th. This process generated close to 100 comments related to the draft Principles. In response to these comments, the draft Principles were revised to reflect the recommendations and themes expressed in the public comments.

- In general, commenters responded positively to the draft Principles, noting that they were “good, high-level Principles,” “clear and well founded,” “appropriate and follow the best practice approach for data governance,” and “right on target.”
- Because several commenters noted the importance of data in a democracy and the natural tension that exists between the need to collect and use data and the need to minimize burden and protect privacy, a new introductory paragraph adapted from OMB Circular A-130 was added to address the value of data as a strategic asset and valuable national resource. It notes that appropriate access to federal data significantly enhances their value and the return on the Nation’s investment in their creation.

Stewardship Principles

- Commenters suggested that the label “stewardship” was not descriptive of the Principles included in that category. They noted that the term stewardship encompasses Principles listed both under the stewardship and quality categories and includes the responsible use of data. They suggested that the first category was better described as data governance. In response, the category “Stewardship” was changed to “Ethical Governance,” and a Mission Statement was added to keep the concept of stewardship as an important higher-order concept included in these Principles.
- A commenter suggested that the Ethics Principle appear first in the list to highlight its importance, and another commenter suggested that this Principle should include the concept of the “public good.” In response, “Uphold Ethics” is listed as the first Principle, and “public interest” was changed to “public good.”
- Because one commenter suggested alternative adjectives, the phrase “modern security practices,” was changed to “sound security practices.”
- One commenter suggested linking the concept of transparency to public trust; in response, “to engender public trust” was clarified as the reason for transparency, and “acquiring, using, and disseminating” was simplified and broadened to “purposes and uses.”

Quality Principles

- In response to comments noting that the stewardship concept was broader than data governance and management and included aspects of quality and responsible use, this category label was changed from “Quality” to “Conscious Design” to make it more descriptive of the Principles it encompasses.
- Public comment revealed confusion about the intent and focus of the draft Principles on Value and Intentionality, particularly the meaning of “create value.” Also, several commenters noted the omission of “fitness for use” as a concept relevant to this category. In response, these two Principles were revised to reflect a focus on harnessing existing data and anticipating future uses, and the order of the Principles was changed to position complementary Principles together. In addition, “fitness for use” was incorporated into the concept of “anticipating future uses.”
- Commenters noted that the Relevance Principle should encompass integrity, accuracy, and appropriateness (fitness for use). In response, the description of this Principle was revised to specifically address quality and integrity in the first sentence and add the concepts of “appropriate and accurate” in the second sentence.

Continuous Improvement Principles

- Commenters noted that the Responsiveness Principle should not be limited to data sharing and access. One commenter suggested it should include updating on an on-going basis and another commenter suggested adding a statement about the cyclical nature of gathering and using stakeholder input. Also, a commenter suggested specifically mentioning state and local governments as stakeholders. In response, this Principle description was revised to more broadly encompass data collection, analysis, and dissemination, to include a statement about the cyclical nature of gathering and using stakeholder input, and to not specifically cite state and local governments as stakeholders. Moreover, “federally-sponsored” was added to the types of data encompassed by the Federal Data Strategy to more specifically address the value of state-collected administrative data used for federal programs.
- Several commenters said the Best Practices Principle was vague and redundant, so that Principle was deleted.
- One comment on the Learning Principle suggested that ongoing investment in technical infrastructure and human resources should be added to the Responsiveness Principle. Other commenters made general suggestions about the need for resources to use data as an asset. In response, the descriptions were clarified to state that learning with and about data happens “through ongoing investment in data infrastructure and human resources.”
- In response to a comment that “practice accountability” doesn’t go far enough and that it is important to assign accountability, “assign responsibility” was added to the description of the Accountability Principle.