

November 16, 2018

Hon. Karen Dunn Kelley
Under Secretary for Economic Affairs
Performing the Nonexclusive Duties and Functions of the Deputy Secretary of Commerce
U.S. Department of Commerce
1401 Constitution Ave NW, Room 4848
Washington, DC 20230

RE: Request for Comments on the Cross-Agency Priority Goal: Leveraging Data as a Strategic Asset: Phase 2 (Docket No. USBC-2018-0017)

Dear Ms. Kelley:

On behalf of our member companies, the Professional Services Council (PSC) respectfully submits this response to the Department of Commerce's request for comments on the Cross-Agency Priority Goal: Leveraging Data as a Strategic Asset: Phase 2 (Docket No. USBC-2018-0017), published in the Federal Register on October 17, 2018 (*available at*: <https://www.federalregister.gov/documents/2018/10/17/2018-22490/request-for-comments-on-the-cross-agency-priority-goal-leveraging-data-as-a-strategic-asset-phase-2>).

PSC is the voice of the government technology and professional services industry. PSC's member companies represent small, medium, and large businesses that provide federal agencies and the military with services of all kinds, including information technology (IT) solutions. PSC also relies on publicly-reported government spending data on contracts to understand the federal marketplace for professional services, identify ways to improve acquisition outcomes and help the government become a "smarter buyer."

Federal agencies generally trail America's leading private sector companies when it comes to harnessing the value of data to make better decisions and improve mission outcomes. Making more government data open by default and publicly accessible in machine-readable format can also promote transparency. PSC thus welcomes efforts to create a Federal Data Strategy and makes the following recommendations related to the strategy's objectives and draft practices to increase government effectiveness, facilitate oversight and promote transparency:

I. Govern and Manage Data as a Strategic Asset

- PSC supports efforts to prioritize data governance within federal agencies as outlined under this objective and the corresponding draft practices.

- In particular, we support efforts to separate data governance from IT governance as its own discipline, agnostic from any technological implementation. This can help achieve a robust, integrated approach to creating, acquiring, using, and disseminating data to deliver on mission, serve citizens, and steward taxpayer resources while respecting privacy and confidentiality.
- PSC recommends the draft practices be updated to encourage Federal agencies to conduct a robust data asset inventory as a pre-requisite to other data governance deliverables.
- PSC recommends that draft practice no. 2 to “Inventory Data Assets” explicitly include the concept of data curation to ensure that data remains accurate and accessible over time. Data curation enables data discovery and retrieval, maintaining its quality, adding value, and providing for reuse over time. This includes making available appropriate contextual metadata that allows a dataset to be discoverable for uses other than its original use, which can help avoid duplication of effort.

II. Protect and Secure Data

- PSC supports adoption of draft practice no. 18 to “[p]eriodically review the terms and conditions of contracts and other agreements involving the processing, storage, access to, transmission, and disposition of federal data to ensure they are sufficient to meet policy and legal requirements.” However, these reviews should not be conducted solely by government officials. PSC recommends that the Department of Commerce convene a working group of stakeholders from all covered sectors to provide the Department with relevant and timely information about the private sector’s experience interpreting and applying relevant policy and legal requirements. Such reviews should further evaluate whether policy and legal requirements reflect current best practices and promote access to innovation as well as the compliance burden for companies.
- PSC supports having a priority for a unified, government-wide approach to data management requirements while allowing individual agencies to define data governance strategies appropriate for their specific missions. The National Institute of Standards and Technology (NIST) is well suited for the role of setting standards for data governance strategy. The data governance strategy should also contemplate best practices related to the technology lifecycle of data storage and tools to facilitate data access, retrieval and security over time for legacy data sets.

III. Promote Efficient Use of Data Assets

- PSC supports efforts to promote fair and equitable public access to federal data through the facilitation and periodic review of access and dissemination mechanisms and sites. The Department of Commerce should further consider the feasibility of a draft practice for data “audit trails” to improve accountability, intrusion detection, and problem analysis.

- PSC recommends that draft practice no. 25 to “Increase Staff Capacity for Data Analysis: Enhance the analytic capacity of the federal workforce by investing in mechanisms to expand staff capacity in data science, program evaluation, and other analytic fields” prioritize training and education to create a more professionalized data curation workforce rather than relegating work related to unleashing the power of data to just “another duty as assigned.” Surveys of data scientists, for example, show that they spend more time discovering and preparing data rather than performing advanced analytics. A professionalized data curation workforce could result in more efficient use of analytical resources and greater focus on high-value work. The data strategy should further consider ways that academia, industry and government can collaborate to increase the professional data curation workforce.
- The Federal Data Strategy Practices should explicitly include improving the Federal IT Dashboard, which promotes transparency and evaluation of the government’s investment in information technology. PSC’s ability to analyze federal IT spending and the effectiveness of IT modernization efforts, for example, is hindered by the unavailability of publicly-reported spending data related to defense agencies’ unclassified IT investments.
- The final practices should promote data reporting quality for federal contract spending to improve the utility of the online Federal Procurement Data System (FPDS). FPDS promotes government transparency and provides information that PSC and our member companies rely on to analyze agency spending and understand the federal marketplace for professional services, including IT solutions. The Department of Defense (DoD), however, does not report on contract actions until three months after civilian agencies, which impedes transparency. In addition, FPDS functionality would be improved if data updates and retroactive changes to data were reported or coded in a transparent manner for FPDS users.

IV. Build a Culture that Values Data as an Asset

- PSC supports efforts to connect federal spending to outcomes. As noted above, the FPDS online database is an essential tool for analyzing federal spending on contracts. This transparency tool could be improved through better data quality assurance and more timely reporting, especially by DoD agencies.
- PSC also supports efforts to attempt to better assess the true value of data assets. For example, an investment in a business analytics solution by a law enforcement agency may reduce the administrative time to manually perform data analysis. Yet this may lead to greater benefits in terms of crime prevention and operational effectiveness that can also be attributed to the underlying value of the data. Better appreciation and understanding of the value of federal data assets could also help build a culture that places more priority on improving data curation and data quality.

V. Honor Stakeholder Input and Leverage Partners

- PSC supports the concepts embodied in draft practices no. 46 “Innovate with Partners” and no. 47 “Honor Proprietary Interests,” which should include an awareness of the potential benefits and innovation that can result from commercialization and public use of data. For example, National Weather Service and Census Bureau data have been successfully commercialized in ways that create value and improve public safety. Including data “audit trails” as noted above could further improve public use of federal datasets.

We thank you for your consideration of our comments and recommendations. PSC would welcome the opportunity to provide additional details at your convenience. Should you have any questions, please feel free to contact me at chvotkin@pscouncil.org or Kevin Cummins, PSC Vice President Technology, at cummins@pscouncil.org.

Sincerely,



Alan Chvotkin
Executive Vice President and Counsel