Comments on Federal Data Strategy – Year-1 Agency Action Plan

Submitted by Qlik

Thank you for the opportunity to submit comments on the Draft Year-1 Agency Action Plan, released on June 4th in conjunction with the Federal Data Strategy. The release of these two documents marks an important step on the government’s journey toward more effectively leveraging data and analytics to make decisions. We applaud OMB for its focus on these issues.

Qlik, headquartered in King of Prussia, Pennsylvania, believes in a data-literate world -- one where everyone can use data to improve decision-making and solve their most challenging problems. Qlik offers end-to-end, real-time data integration and analytics solutions that help organizations access and transform all their data into value. Qlik helps companies lead with data to see more deeply into customer behavior, reinvent business processes, discover new revenue streams, and balance risk and reward. Qlik does business in more than 100 countries and serves over 50,000 customers around the world including more than 75 U.S. federal government customers.

Year-1 Action Plan

With the completion of the strategy the hard work of turning that strategy into action begins. While we believe each proposed action is important in its own right, we have identified the following as most critical to the ultimate success of the Federal Data Strategy.

Promoting Data Literacy

Action #1 calls for the establishment of a cross-agency Data Council, housed at OMB, to coordinate information policy development and implementation activities and provide guidance on government-wide data standards and improvements. This Council will be critical to the implementation of the Federal Data Strategy. As with many of the actions proposed in the year-1 plan, we believe the Data Council should focus its attention on developing policy that will assist agency personnel in becoming data literate, i.e. to improve everyone’s ability to read, understand, work with, analyze and argue with data — not just data scientists. The more people who are data-literate, the more impact an agency will see -- real organizational changes that lead to real results. Data literacy should be a core tenet of the policy development undertaken by the OMB Data Council.

Action #2 requires that GSA “create an inventory of data science training and credentialing opportunities used by and available to federal agencies.” This catalog is intended to assist federal employees in identifying the required education and training needed to advance in a data-focused career. While we are sure that the inventory will be filled with a host of courses on big data, analytics, software development, and data management we believe as we
mentioned above that more fundamental to increasing agency use of data is data literacy. Our studies show that the more comfortable employees are, the more valuable the data becomes. Unfortunately, only 24 percent of business decisionmakers (from junior managers to the C-suite) feel comfortable using data to make decisions. Fortunately, 78 percent say they are willing to learn. Data literacy starts at the top, with a commitment from government-wide and agency leadership to develop a more data literate workforce. Knowing this, GSA, working with OMB and the other data strategy stakeholders have a unique opportunity to build data literacy into the proposed data science and credentialing catalog.

Similarly, Action #14, calls on all federal agencies to have begun to identify critical data skills required to support high quality analysis and evaluation, data management, and privacy protection with 1-year of issuance. The action rightly calls out that “[d]ata-driven decision-making requires not only accessible, high quality data but also a workforce with adequate knowledge of data security practices and data skills”. Data literacy training can and should play a critical role in helping agency personnel obtain basic data skills and training efforts should not be restricted to only those we identify as in data-related jobs, but expanded to anyone who’s value would be enhanced by becoming more data literate. The more literate an entire organization can be, the more value that organization will derive from its data.

In summary, data literacy is key to building a data-driven culture, which is essential to ensuring effective implementation of the federal data strategy. For tips on weaving data literacy throughout the fabric of the action items, look to agencies who are doing this well, like EPA, DAU and OSD. Also visit thedataliteracyproject.org for free coursework, tips, etc.

Data Ethics, Governance and Usage

The growth of availability of data has increased the promise of what can be derived from data collected, stored and analyzed by governments and corporations alike. With this promise comes responsibility to create a framework for the ethical governance of the data we possess. Action #3, as proposed, is the right to identify the development of a data ethics framework as a critical shared responsibility. Citizens who share data with government must have trust that their data will be protected and not used in a manner as to discriminate against them in any way. Achieving balance is key to unlocking the overall potential of data use and this becomes all the more relevant as we consider the growth automated tools such as artificial intelligence (AI) and machine learning.

Action #9, aims at delivering on the promise of AI and builds off the Administration’s Executive Order on Maintaining American Leadership in Artificial Intelligence. Critical to this action is increasing access to data, while enabling discoverability and usability. Qlik software provides the industry’s only end-to-end data management and analytics platform.
The ability to discover, manage and analyze data as described above is key to promoting the adoption of AI and related automation tools in government.

The establishment of data governance bodies within each federal agency as required within 1-month by Action #12 is important, but empowering data leaders and providing them with the resources needed to drive data into the decision-making process is absolutely essential. Strong data governance, as well as data literacy, starts with empowered leadership. The Foundations in Evidence-based Policymaking Act requires each federal agency to have a Chief Data Officer. But it is not enough to appoint someone for this role and walk away without giving them the tools and resources needed to make a difference, or worse yet add the role of the CDO to the CIO or another CXO’s long list of responsibilities. Data leaders must have a seat at the table and a role in data decision-making, leading the agency’s data transformation, not just watching as others make data-related decisions. In the past few years we have seen Chief Data Officers be established at a number of federal agencies -- some are empowered and some are not. Very few, if any, have the resources needed to make changes the way the data strategy and the Evidence Act envisions. For the strategy to be successful in the long run, this will have to change.

Action #16 asks agencies to identify priority data sets for agency open data plans. The action goes on the say that agencies will identify by August 2020 “an initial set of priority agency datasets that are key to mission success and/or a priority for stakeholders outside of the agency.”

The availability of data and data sets is crucial to deriving value from the information. The government should take a default position of open data, making as much data as possible available, while ensuring the protection of personal information and ethical data governance as we have discussed elsewhere in these comments. The more data available, the more insights that can be gleaned from it. States and local governments have seen tremendous success and opportunity when agencies collaborate and share data toward a greater good. Imagine the possibilities with the better and more effective use of data analytics. Areas like immigration, disaster preparedness, health care and agricultural analysis all could be advanced. Analytics can help law enforcement to identify narcotics trafficking, alert farmers when soil nutrient levels are low and help immigration officials quickly identify which visa applications to flag for further inspection. Disaster relief organizations have leveraged analytics to ensure medical supplies were efficiently delivered to those who needed them most. All of this hinges on the availability of data and through this action item agencies should do all they can to make as much data available as possible, as quickly as possible.

Overall, the strategy is solid, now the key to success will be measured by the effectiveness of implementation.