

October 3, 2022

**Office of Science and Technology Policy
Subcommittee on Equitable Data of the National Science and Technology Council**

The Data Foundation is a non-profit organization that seeks to improve government and society by using data to inform public policymaking. Our Data Coalition Initiative is America's premier voice on data policy, advocating for responsible policies to make government data high-quality, accessible, and usable.

We support the Office of Science and Technology Policy's commitment to understanding "how federal agencies can better support collaboration with other levels of government, civil society, and the research community around the production and use of equitable data." While our mission is not centered on equity, we recognize the importance of data in measuring and addressing systemic inequities, as well as how improved and more equitable access to data can improve public policymaking. This comment will address questions #3, #4, and #6 by discussing how the National Secure Data Service proposed by the Commission on Evidence-Based Policymaking and authorized in the CHIPS and Science Act can facilitate increased data sharing between different levels of government. It also describes the tools and resources needed to make data more accessible to underserved scholars and research institutions as well as the public.

3. What resources, programs, training, or other tools can facilitate increased data sharing between different levels of government (Tribal, territorial, local, State, or Federal) related to equitable data?

Data linkages are a powerful tool that leverage existing data for evidence building activities that can inform policies that address pressing and long-standing equity concerns. These linkage programs present the potential to create a cross-sector understanding of service use, evaluate policies, and design interventions without creating more burdens on underserved communities to continually provide data to government agencies.

Examples of data linkage pilots can be found in the federal government already. One especially successful program is the data linkage activities at the National Center for Health Statistics (NCHS). NCHS has linked data from their National Health Interview Survey and National Health and Nutrition Examination Survey to administrative data from the Department of Housing and Urban Development, providing an opportunity to examine the relationship between health and housing, as well as to administrative data from the Department of Veterans' Affairs, giving insights into a wide range of the health-related topics for veterans.

These examples demonstrate the value of data linkages, as well as the standardization of data needed to facilitate data sharing between agencies and among jurisdictions that enable such linkage. Bringing together all of these concepts, the recently-authorized National Secure Data Service Act provides an opportunity to increase data sharing and collaboration between governments related to equitable data. **A National Secure Data Service (NSDS) offers a way to overcome existing challenges with data sharing and access by providing a central data infrastructure that facilitates coordination between federal, state, and local governments, as well as non-government organizations, to securely link, access, and analyze data for evidence building.** In August 2022, the CHIPS and Science Act authorized

a NSDS demonstration pilot at the National Center for Science and Engineering Statistics (NCSES) at the National Science Foundation. By connecting the NSDS to NCSES, the data service will fall under the Confidential Information Protection and Statistical Efficiency Act (CIPSEA), a strong privacy framework used by statistical agencies that is enforceable by criminal and civil penalties. The NSDS was a central recommendation of the Commission for Evidence-Based Policymaking of 2017 and is a focus of the Federal Advisory Committee for Data for Evidence Building (ACDEB), whose final NSDS implementation report is to be released October 2022.

4. What resources, programs, training, or other tools can expand opportunities for historically underrepresented scholars and research institutions to access and use equitable data across levels of government?

To improve data access for historically underrepresented scholars and institutions, there must be improved data discoverability, formatted in an accessible format, and data must be available under open license. Resources like the NSDS and a Standard Application Process, as mandated by Title III of the Foundations for Evidence-Based Policymaking Act, can help remove some of the traditional barriers to data access such as cost and burden, but challenges will still remain while data sets, particularly those of interest to researchers and scholars investigating social inequality, are unable to find the data needed. Robust metadata standards, which describe access rights, quality, and completeness of demographic data, are needed to aid in discoverability.

Further, data should be available in a format that aids access for researchers. Ensuring the data are made available in a machine-readable format – which is described by OSTP as one "that can be easily processed by a computer without human intervention while ensuring no semantic meaning is lost" – is critical to expanding the use of government data.

Finally, making the data available under an open license so that users have the rights to disseminate and reuse it without financial or legal repercussions removes significant cost barriers for scholars and researchers. The COVID-19 pandemic is one example of how restrictions on the reuse of research data and articles can hamper progress. In March of 2020, [OSTP joined other nations](#) in asking scholarly publishers to lift their paywalls on COVID-related research data.

6. What resources, programs, training, or tools can make equitable data more accessible and usable for members of the public?

The Equitable Data Working Group's *Vision for Equitable Data* called for catalyzing existing federal infrastructure to leverage underused data, including expanding protected access. The National Secure Data Service, described above, can achieve this and provide a mechanism for more equitable data access and a foundation for data-driven decision-making across levels of government. By providing a central, CIPSEA-protected data linkage platform, the implementation of a NSDS will enable government and researchers to leverage non-classified data collected by government agencies to better understand implications of policies and programs, and can provide opportunities to identify potential issues with the data related to equity.

Thank you for the opportunity to provide comments on the production and use of equitable data. The Data Coalition is always available to support OSTP's efforts to create a more equitable federal data system. Please contact me at corinna@datafoundation.org if you have any questions or would like to discuss the Data Coalition's interest in this matter further.

Sincerely,

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