

State CDO Network



This letter is being submitted by the State Chief Data Officers Network (State CDOs) and is intended to offer support and feedback on the federal data strategy. The State Chief Data Officer Network is a voluntary collaboration of the executive leadership for information and data in State government.

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State Governments receive over \$650 Billion in Federal funds¹ annually, and carry out a variety of programs on behalf of the Federal Government in order to ensure the health, safety, and wellbeing of individuals across our nation. Further, state and local government are often the primary source, providers, or collectors of data for federal agencies. Collectively, State and Federal agencies can work together to modernize business processes and service delivery, through innovations in the use of data, that will improve the lives of Americans and drive economic growth.

In general, the State CDOs applaud the development of the Federal Data Strategy and appreciate the iterative process through which it is being developed. We believe the ten draft principles represent a solid foundation on which to further develop a more detailed plan. Given that state and local governments are not simply stakeholders, but entities that are formally involved in the federal data pipeline, we offer the following suggestions to further strengthen the draft principles:

1. Under “Stewardship” we recommend formally acknowledging the relationship state and local government have in federal data by adding the following principle: “Engage Partners: Actively engage with state and local government programs responsible for federal data collection to promote consistent data stewardship practices.”
2. Under “Continuous Improvement” we recommend modifying principle 7 as follows: “Demonstrate Responsiveness: Improve data sharing and access with ongoing input from state and local governments, users, and other stakeholders.”

While the State CDOs recognize the desire to maintain a broad set of principles to guide federal activities are necessary, we believe that formally acknowledging the stewardship role the state and local government play in the federal data pipeline within its principles will enhance the Federal Data Strategy. Further, we believe an opportunity exists to modernize the methods by which state provide or submit data to federal agencies. We believe the time has come to begin moving away from annual submission of flat files to more modern connections.

¹ Source: U.S Census Bureau, *State and Local Finances by Level of Government and by State: 2015*

State CDOs also see an opportunity to collaborate on the federal use cases. “Economic Development”, “Public Safety”, “National Security”, “Health”, and “Education” are all valuable use cases and states have an interest in and are involved in all of these areas. The State CDOs recommend refining the use cases in education and health to focus on the following:

1. Education and Workforce Outcomes: Most states operate or are in the process of establishing longitudinal data systems that seek to inform policy makers on the workforce outcomes of publicly funded education programs, including higher education. These systems help states understand how public education aligns with the needs of employers in their states as well as to evaluate the effectiveness of publicly funded education.
2. Combating the Opioid and Addiction Crises: Virtually every state is in the process of formulating strategy to monitor and reduce overdose related deaths and improve addiction treatment and intervention strategies. There are numerous sources of data that exist at local, state, and federal levels to support research and evidence based policies in this area.

Additional recommended use cases:

3. Recidivism: Most levels of government have made reducing recidivism a priority. In order to not only understand the causes of recidivism, but to identify the effective strategies to reduce it, data from a variety of programs not typically associated with the justice system are required. Integrating data related to housing, substance abuse, Medicaid, employment, education, transportation, and many others can aid in this area.
4. Fraud, Waste, and Abuse: There’s a significant opportunity to leverage administrative data to identify instances of fraud, waste, and abuse. Efforts are currently underway in several states to ensure federal and state funds are used appropriately and we believe these initiatives can be scaled in collaboration with the federal government.

States most often create data in response to federal programs and requirements, and report these data to those federal programs. This puts states in the unique position of creating and stewarding data based on federal requirements and therefore managing the data according to federal privacy and other requirements. Currently states face a confusing array and inconsistent application or interpretation of these requirements. This often prevents the states from sharing data effectively among their programs and with other states. To truly leverage data as a strategic asset for evaluating program effectiveness, the State CDOs believe both state and federal agencies will benefit tremendously if federal leadership:

- harmonizes the current landscape of confusing and conflicting privacy regulations and
- establishes clear and consistent guidance aligned to various federal laws governing the use of protected data as it relates to the evaluations/audits of programs and delivery of services.

Overall, the State CDOs believe the current iteration of the Federal Data Strategy to be a solid first step in the formulation of a long overdue vision for a coordinated and integrated approach to managing federal data. We appreciate the interactive and inclusive process articulated thus far and look forward to continued engagement throughout the formulation of the Strategy. In that spirit, we recommend convening a series of virtual roundtable discussions with State and Local CDOs (or equivalents) to share knowledge and best practices and to formulate detailed strategies to promote effective use of data amongst all levels of government.