December 12, 2022

RE: Design and Implementation Features of Open Data Services at DOL

To Whom it May Concern,

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.

In line with Data Coalition priorities, we applaud the Department of Labor's efforts to expand public data access so that the Department of Labor can "best reflect public interests, serve public needs, and continue to be customer focused, while protecting the confidentiality of its data providers." It is particularly encouraging to see specific attention to providing standardized, machine-readable data in electronic formats as well as a centralized, searchable portal with metadata included in the Department's plans to enhance open data capacity.

To build on these efforts to ensure the Department's data are widely accessible and available, interoperable, and useful for analysis, the Data Coalition offers the following comments addressing topics 2, 3, 5, and 10 from the Request for Information.

- The Data Coalition supports the Department's plans to make data sets from across the Department accessible through the proposed centralized, searchable portal to enhance analytical efficiency and insights. Tagging data as it relates to topics, such as enforcement data that now exist at each individual sub-agency within the Department, will allow policymakers, researchers, and other interested parties to easily search and access disparate data sets. Development of data dictionaries that include topics, programs, or other categories by which to sort data sets can help enhance discoverability and use of Departmental data. Specific data sets that merit prioritization are both the [WIOA Individual Performance Data](#) and [Eligible Training Provider results data](#).

- Access to longitudinal data provides substantial insight into trends and programmatic outcomes over time. As the Department moves forward with implementation of its open data services, emphasis on the development and dissemination of longitudinal data sets would improve the usefulness of Department data and ensure continued utility. Accessible longitudinal data linked with data from the Department of Education and other agencies could transform policymakers' and researchers' ability to understand how education affects workforce over time, providing insight into ways to strengthen the U.S. workforce and increase global competitiveness.

- The Department's open data services should also prioritize producing real-time and near real-time data. Standardized, machine-readable data in electronic formats will undoubtedly decrease the amount of time and resources necessary to publish Department data. We want to reiterate the importance of this aspect of the Department's plan and emphasize the need for timely, accurate data to inform decision-making and demonstrate the impact of the Department's efforts to support the workforce. For example, more timely, publicly available data from workforce programs could allow the development of a resource to measure program effectiveness and enable comparisons sooner, allowing for evidence-informed responses to happen when needed, rather than making adjustments to factors that may have already changed.

- The Department should also work with the Office of Management and Budget, as well as the Commerce Department's Census Bureau and Bureau of Economic Analysis, to facilitate full implementation of Section 3575 of the Evidence Act – which allows the three statistical agencies to share business data to inform public and private decision-making.

The above suggestions, in conjunction with the stated open data service plans, contribute to the Department's ability to ensure interoperability, as well as linkage and comparison of data – all key to improving analytical capabilities across the U.S. government. In addition to strengthening the evidence base for informed decision-making and increasing transparency, deeper, integrated analysis across sub-agencies and programs will enable the Department to meet the requirements of President Biden's Executive Orders on equity and on customer experience.

We also want to strongly encourage the Department of Labor to collaborate with other agencies and initiatives happening within the federal government, notably the National Secure Data Service at the National Science Foundation's National Center for Science and Engineering Statistics (NCSES). The Department of Labor should work with NCSES to identify and sponsor a high value project that demonstrates the value of streamlining data sharing. This could be a meaningful opportunity to continue important work already underway at the Department, such as data equity pilots.

Lastly, to carry out the Department's data capacity aspirations, developing and recruiting internal data talent must remain a priority. The Department should continue to participate in multi-agency efforts to hire data scientists and other data professionals and to implement OPM's new Data Science Occupational Series. The Department may also want to consider alternative hiring models or partnerships with the private or philanthropic sectors to bolster the Department's ability to accomplish its goals. Finally, recruitment will only succeed if the Department is able to retain new data talent, which will require sustained focus on building the executive support and communities of practice to ensure that new recruits can meaningfully contribute to building data infrastructure, strengthening data governance, and transforming data culture.

Thank you for the opportunity to provide comments on the Department's efforts to expand access, enhance utility, and increase comprehensibility of its data. The Data Coalition is always available to provide support to build a more accessible and robust data ecosystem. 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.

Sincerely,

Corinna Turbes
Policy Director
Data Foundation