DATA Act Implementation: Where's the Plan?

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On balance I believe <u>passage of the DATA Act</u> will be a good thing as long as its implementation is effectively planned managed. Before commenting on its ultimate success or failure, though, I'd like to see a detailed work plan with resources, responsibilities, a timeline, and deliverables. That's just good project management.

In last year's <u>A Project Manager's Perspective on the GAO's Federal Data</u> <u>Transparency Report</u>, I noted how the GAO made three prescient recommendations that are in varying degrees being addressed in the DATA Act:



- 1. For Federal financial transparency efforts to be successful there needs to be a plan developed that includes a timeline, specific standardization responsibilities, and ongoing congressional support with regular engagement of stakeholders.
- 2. Management and governance of the process needs to be beefed up. Currently the governing GAT Board is a coordinating body with strategic not implementation responsibilities. To some extent it coordinates the standardization efforts of several different agencies but it has no explicit implementation authority.
- 3. Whatever transparency standards and processes are developed, the "burden" on those outside government who may need to submit data to the government as part of it financial data transparency program needs to be taken into account.

Despite the real direct and indirect <u>costs of data standardization</u> I'm a firm believer in the value of data standards in data collection and reporting which the <u>DATA Act promotes</u>. While the DATA Act makes a major improvement in governance over previous standardization efforts by explicitly assigning responsibilities to the <u>Treasury Department</u>, as a project manager with data conversion and data transformation experience I'm still taking a "wait and see" attitude given the complexity of the challenges. The devil is always in the

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details with such complex undertakings.

I'm hoping, for example, that the process by which DATA Act implementation is planned and managed will itself be open and transparent. Standardizing financial and reporting data always has ripple effects consisting of both intended and unintended consequences on business processes that surround data production and distribution. It will be very interesting to see how Treasury defines, prioritizes, coordinates, and oversees the numerous overlapping projects as we move towards more standardization and public access.

In my own experience managing data projects there's usually a "business as usual" issue that needs to be taken into account when systems are changed. Federal agencies and their supporting IT and financial systems must continue to serve both internal and external programs and users while at the same time responding to the changes to systems and processes required by the DATA Act. Coordinating this move to standardization and public access will require a careful balancing of current versus future requirements. Given the strains already apparent in Federal IT staffing and <u>a declining sense that innovation is welcomed</u>, there are likely to be some bumps along the way as Treasury coordinates complex changes to standards, systems, and business processes. Minimizing these bumps will require careful planning and careful leadership both of which need to evolve since they aren't spelled out in detail in the DATA Act itself.

I expect to see turf battles develop as resources (i.e., staff) are moved around to accommodate needed changes. Governance responsibility might be Treasury's but implementation -- and budget and resource implications -- will require careful planning and collaboration between program leadership and individual agencies. Just the changes to contractor performance will be a major concern given the heavy ongoing involvement of the contracting community in current system operation.

This is one of the situations were Congressional oversight will be incredibly important. Such oversight will benefit from an agreed-upon plan that includes with milestones and deliverables that all stakeholders agree to and are free to communicate about.

Related reading:

- <u>Graphic Display of Terms in Obama's Executive Order Making Open and Machine Readable the New</u> <u>Default for Government Information</u>
- Data Standardization Scores and Changing the DATA Act
- <u>Understanding How Open Data Reaches the Public</u>
- The State of Government Data Transparency, 2013
- <u>Transparently Speaking, Are Bad Data Better than No Data At All?</u>
- When Does a Public Data Good Become a Private Data Resource?
- <u>A Framework for Transparency Program Planning and Assessment</u>
- When Are "Open Data" and "Hiding in Plain Sight" Synonymous?