# Public Comment Initial Analysis

April 2021

# Key Takeaways
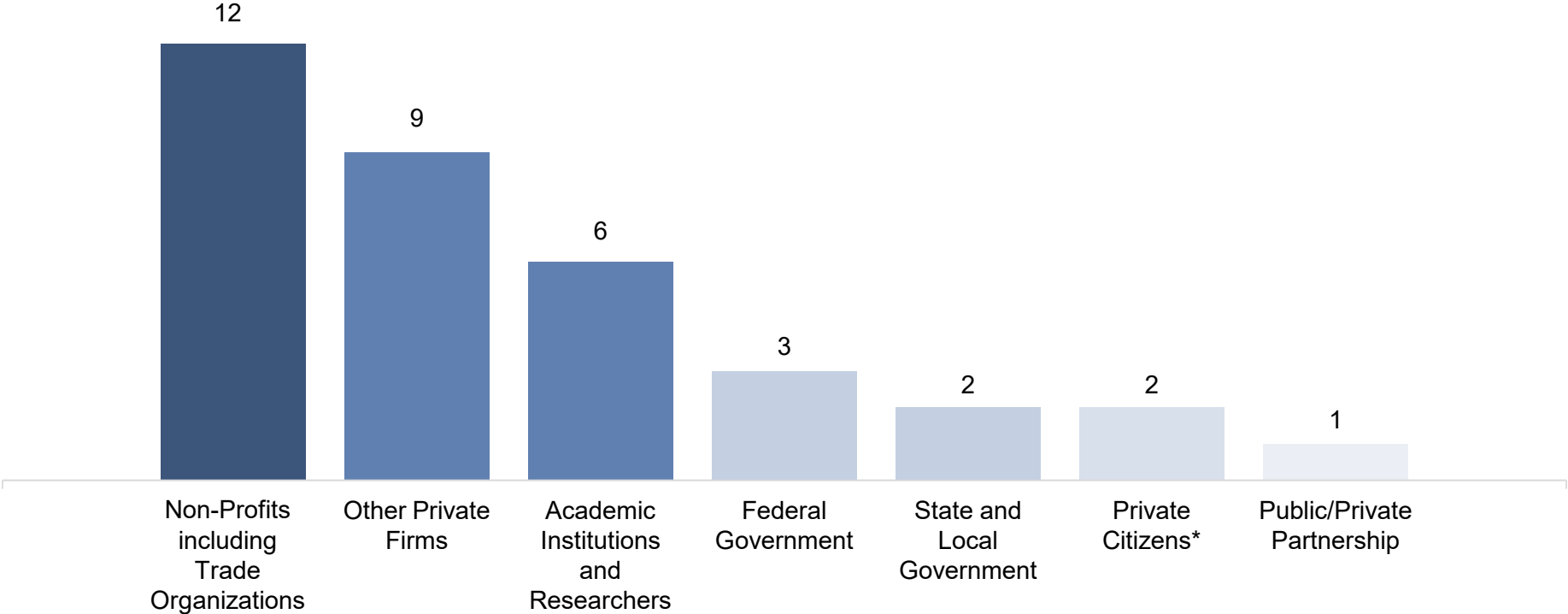
- Commenters expressed widespread support for the Commission's recommendations; including affirming the NSDS concept while offering suggestions for its structure and functions

- Commenters offered a solid collection of use cases, frameworks, and data sharing systems/mechanisms examples like:
  – Linking data from 28 Florida community colleges to develop performance funding metrics
  – Using SEC investor testing initiative insights to inform evidence building policies across government
  – Applying principles of the FSRDC framework to the NSDS

- While most commenters offered general observations and examples from their own perspectives many also made specific suggestions and recommendations, such as:
  – How to increase federal and state and local evidence building capacity
  – How to structure the NSDS
  – How to protect privacy when using statistical data for evidence building

- Their in-depth discussions of challenges covered both wide-reaching difficulties with evidence for decision making and specific hurdles for NSDS; common challenges listed included: **data access, data availability**, and **resource constraints**

- Commenters highlighted several methods for building capacity and expertise; *partnership* was the most mentioned, followed by *data literacy* and *user training*

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# The Committee received 35 comments form seven distinct entity types

## Number of Commenters by Entity Type
n = 35



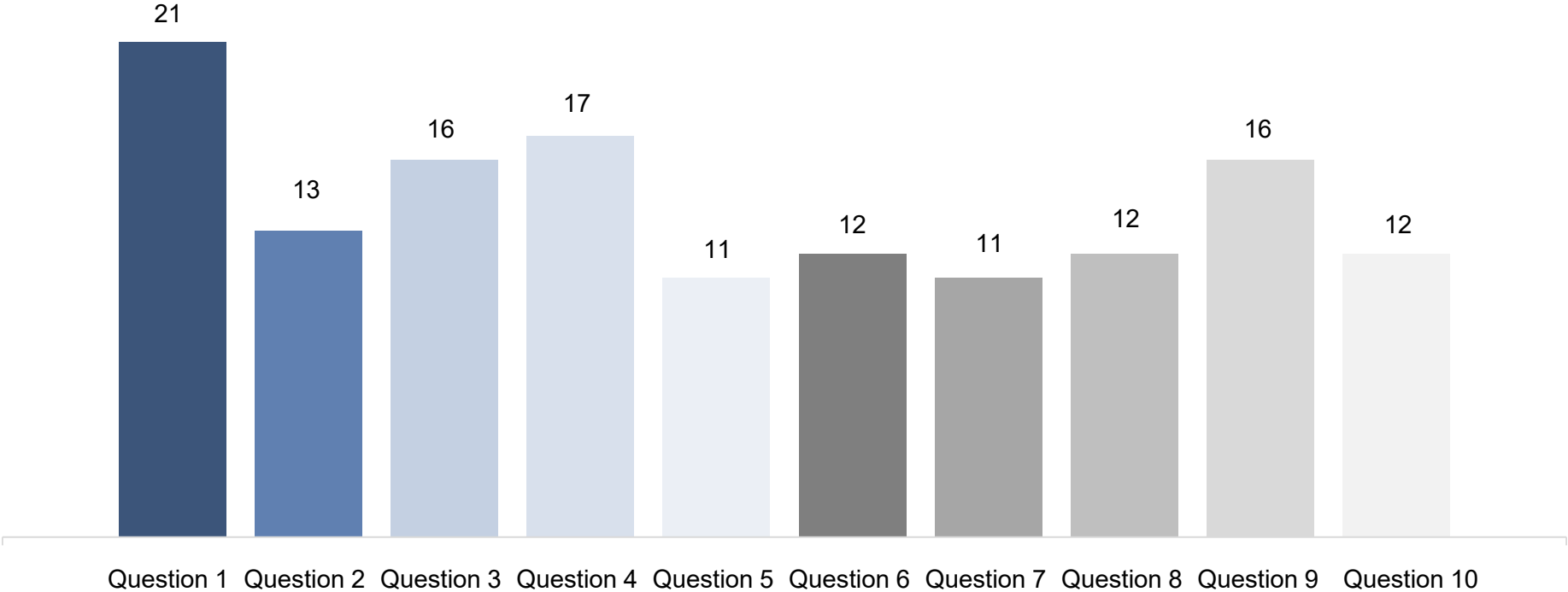*Private citizens included former OMB official and longtime data practitioner

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# The 35 commenters provided 141 comments addressing all ten questions from the Federal Register Notice

**Number of Comments by FRN Question**

n = 141

# Comments represented a full array of constituencies
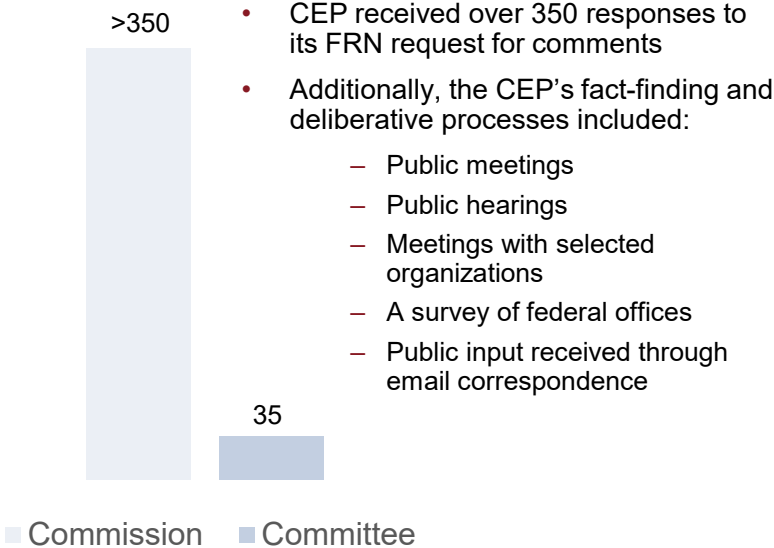
## Represented Communities

- **Broader evidence community:** Including current and former government officials as well as organizations, researchers, and professors

- **State and local government**: Representatives from state and local governments as well as groups who represent and support them

- **Data equity**: Organizations focused on ensuring equity

- **Indigenous Peoples**: Academic research papers on culturally responsive Indigenous evaluation (CRIE)

- **Key data-based industries:** Representatives of education and health care sectors

## Who's Missing

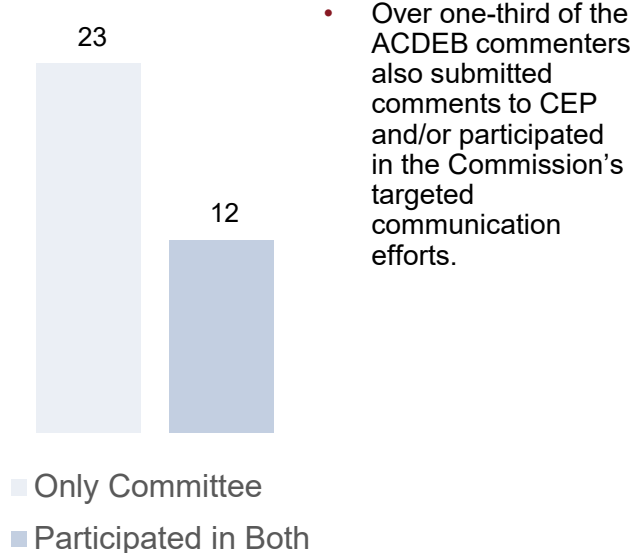> *Privacy*: *While many commenters acknowledged the challenges with protecting privacy, only a handful of commenters scratched the surface of emerging technology solutions, and there was only one set of comments (from Galois Inc., University of Boston, and Barnard College) from the perspective of technology researchers and providers and privacy advocates.*

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# The Committee's work is built on the foundation of the public input the Commission solicited and received

## Number of Public Responses

>350

35

- Commission
- Committee

- CEP received over 350 responses to its FRN request for comments
- Additionally, the CEP's fact-finding and deliberative processes included:
  - Public meetings
  - Public hearings
  - Meetings with selected organizations
  - A survey of federal offices
  - Public input received through email correspondence

## Shared Commenters

23

12

- Only Committee
- Participated in Both

- Over one-third of the ACDEB commenters also submitted comments to CEP and/or participated in the Commission's targeted communication efforts.

**Reminder:** (1) ACDEB's work is an extension of CEP's efforts and (2) The Commission enacted an extensive, multi-pronged communications approach to gather input to inform its recommendations

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# There are some possible future analysis the Staff can provide at the direction of the Committee

**Potential Future Analysis**

- Inventory use cases, frameworks, and other examples of data sharing systems/mechanisms and sort into categories for further analysis

- Flag descriptive vs. prescriptive comments and sort suggestions into categories for consideration

- Provide additional information to ACDEB subcommittees as requested

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