NATIONAL ACADEMY OF
PUBLIC ADMINISTRATION®

Advancing Information Policy and Use at the Office of Management and Budget

Academy Election 2020 Project
Select Task Force:
Organization of Information Policy and Use at OMB

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The Academy formed a series of Working Groups of its Fellows to address Grand Challenges in Public Administration. These Groups were charged with producing one or more papers to advise the Administration in 2021 (whether reelected or newly elected) on the key near-time actions that should be taken to begin addressing Grand Challenges. This is a paper of an Office of Management and Budget (OMB)-focused Select Task Force associated with the Develop New Approaches to Public Governance and Engagement Grand Challenge. It includes these Fellows' recommendations for how OMB should prioritize information policy and use in 2021.

ADVANCING INFORMATION POLICY AND USE AT THE OFFICE OF MANAGEMENT AND BUDGET

A REPORT OF AN SELECT TASK FORCE

NATIONAL ACADEMY OF PUBLIC ADMINISTRATION
ELECTION 2020 SELECT TASK FORCE:
ORGANIZATION OF INFORMATION POLICY AND USE AT OMB

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THE CHALLENGE

The country is facing unprecedented challenges that public officials at all levels of government need to address quickly, effectively, and decisively. The federal government has a critical leadership role to play in taking on existing and emerging policy challenges during 2021, such as basic health and safety for the nation, while leading economic recovery and renewing public trust in government. Timely, relevant, high-quality information and insights are needed to develop and implement policies that work. And the government will continue to need reliable information to address ongoing medium- and long-term issues such as social justice, climate change, homeland security, infrastructure, and fiscal responsibility. The information government collects from individuals and businesses is critical to addressing nearly every challenge facing our nation today.

The U.S. government currently collects, manages, and disseminates more information from the American public than at any point in its history. This information is intended to support the provision of services and programs, decisions about benefit eligibility, enforcement actions, improvement of operational performance, long-term analysis of program outcomes, statistical indicators measuring the economy and society, and much more. When used responsibly and for achieving social good, this information offers a vital input for decision-makers and a resource for holding government accountable. Conversely, when managed poorly, information collected by the government can cause serious losses of privacy and well-being, as demonstrated by intrusions into federal and non-federal systems.

The center of the federal government's information infrastructure is the White House Office of Management and Budget (OMB), which substantially influences how information is collected, processed, disseminated, and used. OMB is statutorily charged with coordinating policies for data collection, data management, information technology systems, open data initiatives, organizational performance measurement and management, regulatory actions, grants management, financial management, program evaluation, statistical policy, information quality, and privacy. These responsibilities are in addition to OMB's obligation to

assemble the President's Budget, which provides the fuel for the Executive Branch's program and policy priorities, and to strengthen the management of federal agencies.

With rapid advances in data science and technology, widespread use of social media platforms, emergence of machine learning and artificial intelligence, and countless other developments, government agencies must have capable mechanisms for adapting information policy to deploy modern approaches to running programs and providing services to the public, as well as meeting emerging needs. OMB has the potential to revolutionize the ability of federal agencies and policymakers within the Executive Office of the President, Congress, and state and local governments to gain critical insights that can be used to tackle today's and tomorrow's complex problems. To date, for a variety of reasons, that potential has not been fully realized. **Unless action is taken to restructure and reprioritize information policy and use within OMB, the President's ability to make the bold, significant changes across government that address the nation's biggest challenges will be severely diminished.**[1]

Building on recent successful efforts like the Federal Data Strategy and reforms to approaches for performance measurement and management, OMB can more effectively leverage the information that agencies provide to inform the formulation and execution of the federal budget and inform economic recovery activities. But OMB's current organization is fragmented and less effective than it could be when it comes to information policy and use. This has a detrimental effect not just on fulfilling OMB's mission, but also on achieving effective and efficient implementation of important government-wide policies and programs. Now is the time to rationalize, order, and collaborate in a way that eliminates fiefdoms, promotes partnerships, and enables advances in data science and technology to take root in ways that can help our country's leaders succeed in meeting the needs and expectations of the American people.

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[1] The terms information and data are often used interchangeably. For purposes of this paper, the term "information policy and use" is meant to encompass both data and the useful information derived from data.

OMB's fragmentation is inadvertent. Numerous well-intended legislative reforms over several decades added mandate after mandate for OMB to manage, while muddying rather than clarifying lines of authority that aimed to make improvements. OMB's disjointed structure hinders its ability to create effective information policies and help agencies implement an integrated, cohesive strategy for data, evidence, and technology. For example, the President's Management Agenda (PMA), designed to address government-wide management challenges, continues to be led by the Deputy Director for Management (DDM) of OMB. The PMA encompasses cross-agency support functions such as acquisition, grants management, financial management, talent management, and IT. Legislative mandates for reform drive each of these areas, but they all rely heavily on infrastructure investment and the use of information and metrics. Other parts of OMB, however, notably the Office of Information and Regulatory Affairs (OIRA) and the Office of Economic Policy (EP), also play significant roles in government-wide policies and practices related to information quality, data, privacy, statistical policy, and program evaluation. At times, the Administrator of OIRA has reported to the Deputy Director for Management, although the Administrator has always operated independently when conducting the regulatory review functions. The Associate Director for Economic Policy nominally reports to the position of Executive Associate Director of OMB, but when that position is vacant, may report to the Deputy Director. **Improved institutionalized processes would help uniformly and effectively integrate these activities into major budget and policy decisions,** supported by OMB's Resource Management Offices (RMOs) and White House policy councils.[2]

Central, prioritized direction, support, and constructive collaboration are critical to achieving any manner of important outcomes, such as improved public health and access to health care; economic recovery and job creation; income, housing and food security; educational opportunity and meaningful workforce training; and effective responses to climate change. Better information management can greatly amplify and accelerate progress in all policy areas.

The effects of OMB's existing structure on information policy and use are felt government-wide. OMB's siloed offices and functions have fuzzy, overlapping jurisdictions but need to collaborate to be effective. For example, the RMOs that oversee the budgets of statistical agencies, such as the Census Bureau or the Bureau of Labor Statistics generally collaborate closely with the Chief Statistician in OIRA. However, there is no single point of responsibility for information policies below the level of the OMB Director.

Exacerbating this problem are wide variations in key positions and roles and responsibilities within the OMB management hierarchy, differing and changing priorities among the political appointees that comprise the OMB leadership team, and uneven allocation of resources within OMB to meet emerging needs. To illustrate, the federal CIO has a broad portfolio (IT modernization and cybersecurity being preeminent), a public external presence, and is a political appointment reporting directly to the Deputy Director for Management. In 2020, the Office of E-Government has over 100 employees.[3] The Chief Statistician of the US also has a broad portfolio (coordinates the entire federal statistical system; ensures the integrity of key statistics such as the census, Principal Federal Economic Indicators, e.g., GDP, trade, employment, the poverty measure; develops standards for official race and ethnicity categories, Metropolitan Statistical Areas, and other official measures; and represents the US internationally at the Organization for Economic Cooperation and

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[2] Examples include the Chief Financial Officers Act, Federal Acquisition Reform Act, Chief Human Capital Officers Act, Information Technology Management Reform Act, Federal Information Security Management Act, and Federal Financial Management Improvement Act created new responsibilities and offices to support the OMB management function with reporting internally to the Deputy Director for Management. The E-Government Act of 2002 removed IT oversight and policy from OMB's Office of Information and Regulatory Affairs (OIRA) and established a separate Office of E-Government reporting to the Deputy Director for Management. Under the Paperwork Reduction Act, Information Quality Act, Foundations for Evidence-Based Policymaking Act, Confidential Information and Statistical Efficiency Act, and Privacy Act, OIRA remains responsible for the coordination of government-wide policies and oversight of agency implementation for information policy, privacy, data sharing, information quality, and statistical and science policy. OIRA and the Office of E-Government both issue government-wide privacy protection guidance and policies.

[3] Note that this includes personnel supported by the Information Technology Oversight Reform account. See Executive Office of the President. *Congressional Budget Submission, Fiscal Year 2021*. Washington, D.C.: EOP, 2020. Available at: https://www.whitehouse.gov/wp-content/uploads/2020/02/FY21-Budget.pdf.

Development and the United Nations) and also has a public external presence, but is a career branch chief in OIRA with a staff of five. The Deputy Director for Management allocates millions of dollars annually to cross-agency performance improvement projects and the President's Management Agenda, which supports implementation of critical management priorities. In contrast, the OIRA Administrator has limited funding to support information policy activities or advances in improving access, quality, or uses of data. The Evidence Team, responsible for building critical program evaluation capacity across government is not even a branch – it consists of a small staff and does not even have a member of the Senior Executive Service leading these important government-wide initiatives.

The uneven integration of these initiatives with the preeminent budget activities of OMB further diminishes their impact. The poor coordination and lack of prioritization of information policy, which now spans decades at OMB – Republican and Democratic administrations alike – has resulted in OMB underachieving the President's goals and priorities, supporting agencies in fulfilling their missions, or enabling the American people to have effective tools for holding government accountable.

This gap at OMB also negatively affects government-wide efforts to implement nimble, effective, and modern approaches to leveraging data in ways that improve the lives of the American people, strengthen the economy, and promote equitable treatment of the country's citizens. Outdated systems, structures, methods, and approaches to learning, improvement, and accountability across agencies contribute to the federal government not taking full advantage of the vast amounts of information it collects to inform policies and understand whether programs actually achieve desired results nor help find ways to improve them. In addition, government-wide processes led by OMB – particularly grants, procurement, and performance measurement and management – require agencies, grantees, and contractors to generate enormous amount of data that too often aren't used to improve results. Too often, instead, reporting requirements impose a burden that diverts resources from rather than supporting more productive information sharing, analyses, and implementation activities.

In recent years, Congress repeatedly acknowledged existing limitations in this infrastructure and a growing need for better evidence to inform decisions. For example, the congressional committee report accompanying the law that created the bipartisan U.S. Commission on Evidence-Based Policymaking asserted:

> *Without evidence, the federal government is an ineffective fiduciary on behalf of the taxpayer. Unfortunately, in many instances, federal decision-makers do not have access to the data necessary to best inform decisions. In such instances, agencies are unable to show the benefits or impacts of the programs they administer and cannot determine what, if any, unintended consequences are created by programs, or whether programs can be improved.[4]*

Notwithstanding subsequent bipartisan reforms to improve the use of data government-wide, such as the *Foundations for Evidence-Based Policymaking Act of 2018,*[5] and the development of a Federal Data Strategy,[6] the federal government's information fragmentation and under-coordination limits government's ability to use information reliably and responsibly to support evidence-informed policymaking, data-driven government operations and management, and science-based regulatory decision-making.

The federal government is now at a critical crossroad. Below we present a vision for how positive change at OMB can result in major improvements in the government's ability to advance critical priorities.

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[4] Committee Report on House Bill 114-211. Available at: https://www.congress.gov/congressional-report/114th-congress/house-report/211/1?overview=closed

[5] P.L. 115-435. Available at: https://www.congress.gov/115/plaws/publ435/PLAW-115publ435.pdf.

[6] *Federal Data Strategy*. Available at: https://strategy.data.gov

VISION FOR EFFECTIVE INFORMATION POLICY AND USE

A strong information policy apparatus at OMB enables program managers and officials across government to have the tools to collect, manage, prepare, and use data for informed decision-making at all levels. It also promotes OMB coordination across its own divisions and units to provide agencies consistent support, guidance, and resources. It facilitates new technology and modern analytic approaches being integrated to address emerging needs. And it enables the availability of reliable, valid information that can support decision-makers in implementing services for the American public who, in turn, have resources to hold government accountable.

The Commission on Evidence-Based Policymaking proclaimed a vision that we echo for the purposes of information policy writ large in government: where "rigorous evidence is created efficiently, as a routine part of government operations, and used to construct effective public policy."[7] The statement is applicable to the entirety of government information policy and practice, where the systems, people, processes, and institutions must work within a common ecosystem to produce meaningful and relevant insights for all manner of decisions.

The Select Task Force recommendations expand on that vision to encompass a broad array of data and information-based activities that will lead to better government. A few examples of where improvements are needed:

- **Modernizing the delivery of benefits.** Beneficiaries of anti-poverty programs must navigate and complete complex federal paperwork to apply for benefits and insurance programs, but those programs should have access to core information about eligibility through administrative data already in government systems. Improving the infrastructure for benefit eligibility determinations requires identification and agreement on common data elements, approval of federal paperwork and forms, IT systems and infrastructure, and funding allocations. At OMB in 2020, improving this infrastructure falls under the domain of numerous

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[7] CEP, 2017, p. 1.

divisions and policy officials, without a clear indication of who would spearhead improvements if any were proposed. This is further complicated by many of the programs being administered at the state level. Collaboration is ad hoc, and when disagreements arise, they can take a long time to resolve, requiring many decisions by the Director.

- **Improving data quality, access, and use.** The vast investment in new IT systems often masks the challenges with data quality and capabilities for analyzing data to make it useful. While agencies have focused attention and resources on modernizing their IT infrastructures, they have not devoted enough attention to the activities that make their data so valuable, such as creating inventories; linking data securely to create new insightful information on operations, services, and societal outcomes; assuring that their data are high quality, particularly when it is collected from state, local and tribal entities; adequately resourcing capacity for data analytics, evaluations, and program use of evidence; and providing appropriate public access to open data and secure, restricted access to important research data. The responsibility at OMB for making sure this happens is split between various RMOs, OIRA, and OCIO.

- **Partnering with states and localities.** State and local implementation partners for federal programs may lack clear incentives to improve how they share and use information collected by federal agencies. These data inform policy makers on changes in the well-being of our population and the effect of measures taken to strengthen the economy. For example, administrative records for anti-poverty programs, including many operated by states on behalf of the federal government such as the Supplemental Nutrition Assistance Program (SNAP), Supplemental Assistance for Woman, Infants, and Children Program (WIC), and Temporary Assistance for Needy Families (TANF), offer insights into the government policies intended to improve mobility. Longitudinal data systems in education provide valuable information about educational attainment that can be linked to workforce outcomes that may relate to economic conditions. Little attention is paid to how these intergovernmental

partnerships can be improved with mutually beneficial uses of the data. These issues have significant privacy and information-security components. But these are just a few of the many examples where stronger intergovernmental partnerships could reap enormous benefits. There is no area in OMB focused specifically on developing these relationships.

- **Building capacity for rigorous evaluations of spending and regulatory policies.** Agencies should accelerate their efforts to develop capacity for scientifically rigorous evaluation of the longer-term effects of federal investments and regulatory activities. More studies are needed such as those conducted by the Department of Housing and Urban Development (HUD) in 12 communities receiving different types of services, including vouchers, rapid re-housing, transitional housing, and typical services or supports. To conduct the evaluation, HUD needed access not only to its own administrative records, but also income and earnings data from the National Directory of New Hires at the Department of Health and Human Services (HHS), child welfare data provided by states to HHS, and new primary data collection conducted by evaluators. Results from the project provided compelling evidence that housing subsidies had significant and cost-effective impacts, relative to other interventions. To replicate similarly valuable studies, OMB offices such as the RMOs, OIRA, and the Evidence Team would need to coordinate much more closely in order to build this capacity and push forward to keep the focus on high priority areas. There is no institutional mechanism for doing this.

- **Coordinating with other components of the Executive Office of the President (EOP).** Other organizational elements of the EOP, such as the Office of Science and Technology Policy, have an important role in pushing agencies ahead in better utilization of new technologies as they rapidly develop in the private sector. But many technologies, such as artificial intelligence, facial recognition, and others need to be supported by clear policies and integrated into existing ethical and quality frameworks. With the current fragmentation within OMB, there is not a single point of coordination with other EOP elements, leading to loss of

productivity, less effective efforts, and potentially redundant or insufficient policies.

Recognizing OMB's critical role, the Commission on Evidence-Based Policymaking specifically recommended improvements to OMB for coordinating government-wide data and evidence initiatives, or information policy.[8] The Evidence Commission recognized that a strong coordination function within OMB was imperative in order to successfully address cross-cutting research and policy questions in an effective and efficient way. This Select Task Force concurs, while noting the problem is more expansive than acknowledged by the Evidence Commission, because the information policy gaps are not limited to the generation of "evidence." Focused attention is needed to consider how OMB can and should most effectively organize its own information policy and other priority activities in 2021 and beyond. OMB can provide more effective leadership across the Executive Branch, using available tools, such as the President's Management Agenda, interagency councils, IT modernization funds, learning agendas, guidance memoranda, regulatory oversight, and the budget process with better internal coordination.

RECOMMENDATIONS

In 2021, the administration should build on recent progress in addressing gaps in information policy, while also accelerating these activities to amplify the priority of improved information utilization to support every agency's mission and the President's priorities. With the unprecedented challenges facing the country, gaps in information and information policy coordination should be quickly addressed. Step one is to rationalize OMB's information infrastructure to maximize OMB's value and role in supporting and directing agencies, including recruiting

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[8] Behind the scenes, the Evidence Commission members, many who were familiar with OMB's structure, considered and advocated for a stronger recommendation that would direct OMB to implement a new organizational unit, bringing together siloed functions related to information policy, evidence, performance management, and privacy. See N. Hart and S. Martinez. "Recommendation Memo #7: Enhancing Collaboration in the Federal Evidence Ecosystem." Memo to CEP Commissioners from CEP Staff. Washington, D.C.: CEP, 2017. Available at: http://datafoundation.org/s/Compendium-of-CEP-Staff-Decision-Memos-1.pdf.

Program Associate Directors, Branch Chiefs, and others with data literacy skills and an understanding of data analytics.

The following consensus recommendations from the Select Task Force are based on the collective experience and expertise of Task Force members, all of whom previously worked at OMB in career or political roles during both Republican and Democratic presidencies. While members may differ on some of the details of these recommendations, they concur on the importance of OMB leadership, coordination, and support across the entire government in the areas addressed in this report. Because much of the statutory groundwork is already laid, many of the important actions needed to bring about meaningful change and effective governing are now administrative, requiring no new legislation or, at most, some legislative fine tuning over time. Most of the necessary actions center on the leadership, goals, structure, and capacity of OMB.

Prioritize Information Policy for Presidential Appointees at OMB

The President should nominate a Director, Deputy Director, and Deputy Director for Management who commit to prioritizing and improving OMB's information policy and use responsibilities. OMB's political leadership positions are critical to ensuring the priorities of OMB are clear to the agency's staff, including framing the processes and procedures to address major challenges posed by the coronavirus pandemic and planning for economic recovery. Aspects of information policy, including the role of data and evidence, should be reinforced in the budgetary, regulatory, and other policymaking processes. The OMB Director and other political leaders should clearly and repeatedly emphasize to OMB staff and federal agencies the role of information policy and use in improving government operations.

- **Why is this needed?** The OMB Director sets the tone and holds the leadership team accountable for advancing presidential priorities. Setting and achieving goals for better agency use of high-quality information are important elements for sustaining improved government-provided services, benefits, and investments in economic recovery, mobility, social justice, and the

environment. Sustainability also requires organizational and cultural change at OMB and across government. Without a clear direction and continued emphasis from the top, institutional change is not likely to occur.

- **What characteristics should the officials have?** OMB political leadership should strongly affirm interest and willingness to be held accountable for OMB's information policy functions and commit to advancing the activities that will improve the ability of information policy to be coordinated and cohesive and to integrate needed investments, evaluations, and meaningful outcome measures into the budget and regulatory processes.

- **How should the OMB Director signal the priority?** OMB political leadership should tell Congress and OMB staff at the outset of the next presidential term that data, evidence, and science are essential elements for effective implementation of government programs that meet the needs of the American people and to promote public trust in government. Then, the OMB Director and the political leadership should continue to incorporate these elements into the day-to-day activities of OMB and its interaction with agencies and other stakeholders (e.g., Congress).

Reorganize OMB Information Policy Activities for Effective Coordination and Clarity

The OMB Director should establish a new position—Assistant Director for Information Policy—to oversee, manage, and coordinate relevant activities across OMB's divisions and offices. OMB currently has an Assistant Director for Budget, which is a high-level career position with responsibility for coordinating all budget related activities at OMB in order to produce the President's Budget and support government-wide budget execution. (An Executive Associate Director, a political appointee, has at times held an oversight role in this area, too.) The position has cross-cutting authority across all OMB offices. A companion position related to information policy and use should be established. This allows a point of responsibility and coordination that can bring together the disparate elements of OMB and be accountable for integrating information

policies across disciplines and closely coordinating with the budget function to assure that budget formulation incorporates the need for or results of rigorous evaluations, high-quality metrics, resource investments, and technological innovation. The position can also help assure that the Regulatory Agendas and Learning Agendas[9] of agencies are in sync. That is, if an agency is planning major regulatory actions such as evaluating existing regulations or proposing new ones, it should be including any scientific studies and data that inform the regulations as part of its Learning Agenda and the budget should reflect the resources needed to carry out those studies. Currently, budget decisions don't always provide resources to evaluate regulatory (off-budget) outcomes that enable agencies to learn and improve future regulations.

Why is this position needed? Creating a senior level official to integrate and align information policy functions can overcome the current challenges of coordinating the procedural information policy work across multiple political appointees, divisions, and offices without a focal point. A clearly recognized leadership role and position can support capturing policy and program improvements, while providing OMB career staff continuity and an institutional framework to resolve OMB fragmentation on this issue. While an existing position could be assigned the "lead role," the history of fiefdoms on information policy at OMB suggests there is no

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[9] Learning Agendas are described in OMB Memorandum 19-23 as follows, "The Evidence Act requires that agencies' strategic plans include a section on evidence building to be developed in conjunction with the agency's process of updating its strategic plan every four years. These evidence-building plans are systematic plans for identifying and addressing priority questions relevant to the programs, policies, and regulations of the agency. Thus, evidence building plans are multi-year learning agendas that provide an evidence-building roadmap to support effective and efficient agency functioning. Learning agendas offer the opportunity to use data in service of addressing the key questions an agency wants to answer to improve its operational and programmatic outcomes and develop appropriate policies and regulations to support successful mission accomplishment. They identify, prioritize, and establish strategies to develop evidence to answer important short- and long-term strategic questions (i.e., questions about how the agency meets its mission(s), including about how programs, policies, and regulations function both individually and in combination) and operational questions (i.e., questions about the agency's operations like human resources, grant-making procedures, financial systems and tracking, and internal processes)."

position currently suited to the capacity. This position could also serve as the OMB liaison for EOP appointees outside of OMB looking to work with OMB on data, technology, innovation, and related matters. This position should also work with Congress on important administration initiatives around information policy.

- **Who should serve in the role?** The individual selected for this position, particularly at its inception, should be familiar with OMB history and culture relevant to addressing siloed and fragmented policies. In addition, the individual should have knowledge and expertise related to the range of relevant information policy functions to include, but not be limited to, data governance, program evaluation, statistical policy, data infrastructure, performance management, information technology, and privacy.

- **Should this be a political appointment?** Initially, this position could be a political appointment, which would enable rapid progress and appropriate stature within the organization to promote change. However, a senior career official would help sustain the role across administrations to provide long-term continuity and institutionalization. One approach would be to start the position as a political appointment, with a career deputy, and then after a few years, transition the position to a career appointment to institutionalize the new approach.

- **Is a formal reorganization necessary at OMB?** No. The proposed modification can be achieved without moving existing offices out of their current positions or chains of command. A formal reorganization would likely be unnecessarily disruptive and delay much-needed improvements. Rather, a small career staff should be assembled to report to the Assistant Director and Deputy Assistant Director to support the coordination function.

- **Who should the Assistant Director report to?** The Director – the Assistant Director would coordinate with the Executive Associate Director, Deputy Director, and Deputy Director for Management.

Coordinate Information Policy and Practice within the Executive Office of the President

Within the first 100 days of the Administration, the Assistant Director for Information Policy should identify OMB responsibilities for information policy and practice and inform the other Executive Office of the President (EOP) components of OMB's roles and responsibilities in relation to the other components. The Assistant Director should then facilitate a joint-EOP component memorandum to federal agencies outlining the vision, intent, and prioritization of information policy and practice, including to support evidence-building activities and evidence-based decision-making.

- **Why is this coordination needed?** With the establishment of a new leadership role at OMB and the onboarding of new political appointees, a coordinated approach reduces duplication of effort and maximizes the strengths of each relevant component of the EOP. A clear, consistent message from each component on information policy also ensures OMB staff and federal agencies are able to advance policies and priorities within the outlined vision and framework across the range of delivery units (e.g., 18F, United States Digital Service, General Services Administration Centers of Excellence) and agency organizational structures.

- **What EOP components should be included?** Office of the Vice President, OMB, Domestic Policy Council, Council on Environmental Quality, National Economic Council, Council of Economic Advisers, Office of American Innovation (or its successor), Office of Public Engagement, Office of Science and Technology Policy, National Security Council, Office of National Drug Control Policy, and any newly-established components.

- **Should there be on-going coordination?** The Assistant Director for Information Policy should set up an on-going coordination task force consisting of EOP components. Other agencies with key data sets such as Treasury, the Census Bureau, the Bureau of Labor Statistics, and HHS, could engage with the task force on an as-needed basis.

LEVERAGING EXISTING ACTIVITIES

Several productive information and data-related activities are underway in OMB to support federal agencies in better leveraging their data. Below are some recommended ways to boost these activities in support of presidential priorities:

- ***Reinvigorate and continue the trajectory of the Federal Data Strategy, under the leadership of the new Assistant Director for Information Policy.*** OMB led the development of a Federal Data Strategy during 2018-2019 as part of the President's Management Agenda, with guiding principles and an annually updated action plan for agencies.[10] In 2019 and 2020, the strategy was co-led in OMB by the Chief Statistician in OIRA and Chief Information Officer in the Office of E-Government, under the direction of the Deputy Director for Management, with other co-leads coming from the Office of Science and Technology Policy, Department of Commerce, and Small Business Administration. A key element of the strategy is to push agencies to make their data more accessible in order to leverage that information to improve programs and regulatory outcomes, and to improve their program management and regulatory policy through informed decision-making. In 2021, the administration should signal the continuation of aspects of the strategy, including by identifying a subset of priority actions for agencies to implement that support pandemic response, economic recovery, and other administration priorities.

- ***Evidence Act implementation activities should proceed, with a coordinated approach for implementation led by the new Assistant Director for Information Policy.*** With passage of the *Foundations for Evidence-Based Policymaking Act of 2018,* OMB acquired several statutory responsibilities and mandates based on unanimous recommendations from the Commission on Evidence-Based Policymaking.[11] These built on existing authorities from the Paperwork Reduction Act, Information Quality Act, Confidential Information Protection and Statistical Efficiency Act, E-Government Act, Privacy Act, GPRA Modernization Act, and

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[10] *Federal Data Strategy.* Available at: https://strategy.data.gov.
[11] P.L. 115-435.

other information policy statutes. Coordinated OMB guidance and technical assistance on implementation of this important law is a linchpin for agency success in implementing the law consistent with congressional intent and the Evidence Commission's vision. In 2021, the administration should set clear expectations for continued progress at agencies in implementing initial guidance on the Evidence Act and should prioritize issuance of delayed regulations and guidance under the coordination of the new Assistant Director for Information Policy.

- ***Establish a mechanism through the internal quarterly President's Management Agenda update in which senior leaders from across OMB meet to discuss major management initiatives, including information management initiatives.*** Many of the management initiatives include a significant information policy or data component and have synergies with other activities that should be more integrated across OMB. A quarterly (or more frequent) update at which senior OMB leaders discuss major initiatives and ensure awareness, assess progress, and identify further opportunities for greater collaboration, synergy, and accelerated improvement will help facilitate the cross-cutting approach needed to solve the complex issues with which the country is dealing.

OTHER ACTIONS DURING THE FIRST 100 DAYS OF 2021

Complementing the recommendations above, the Select Task Force suggests the following series of specific actions within the first 100 days of the Administration in 2021 to reinforce information policy and utilization priorities:

- ***Inform the relevant CxO councils of the new coordinated approach.*** OMB should convene the major cross-agency councils (e.g., Chief Information Officers Council, Chief Data Officers Council, Interagency Council on Statistical Policy, Privacy Officers Council, Evaluation Officers Council, Chief Human Capital Officers Council, Chief Acquisition Officers Council, Chief Financial Officers Council, Performance Improvement Council, Regulatory Working Group), in addition to agency

general counsels, to emphasize the need for coordination, collaboration, and cooperation on the administration's priorities. In addition, OMB should clearly delineate roles and responsibilities, including how relevant officials in agencies can most effectively approach OMB for information policy and utilization support and guidance.

- *Initiate a review of the formal Information Collection Budget* in OIRA to determine a strategy for better utilizing this resource for achieving the administration's goals on evidence-building activities. Among other goals of this review, OMB can consider how existing government-wide processes for procurement, grants management, and reporting generate information that varies in level of quality, burden, and utility.

- *Assess OMB capacity and allocate sufficient resources for Information Policy*. OMB leadership should review the organization's investment in information policy activities to determine if gaps in capacity exist. Should gaps be identified, OMB should reallocate resources internally, including limited moving of some positions or functions, if necessary,[12] and request sufficient resources in the Fiscal Year 2022 President's Budget to address any remaining capacity limitations to support implementation of mandates assigned to OMB.

- *Improve agency accountability for Information Policy.* OMB should hold high-level agency officials accountable for advancing important priorities and for collecting, using, and sharing data and other evidence as needed to make progress on those priorities. To achieve meaningful improvements in health, housing, education, jobs, economic success, and climate progress, agencies must "build muscle" consisting of more intelligent systems and evidence-based approaches to designing, running, and evaluating programs and regulations. Establishing high-level cross-agency task forces of

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[12] Some reallocations that have been positively discussed during the past two administrations, but never acted upon, include creating a second Deputy Associate Director position in OIRA for the Chief Statistician and moving OIRA's information policy functions under that position to increase visibility and emphasis, moving the Evidence Team out of EP to OIRA, and combining the privacy functions of the Office of E-Government and OIRA in either office.

senior agency political leaders who have the necessary span of control over relevant functions (e.g., Deputy Secretaries), and who are supported by senior agency career officials is needed to effect change in agencies. OMB should work with the Office of Personnel Management and agencies to prioritize recruitment of individuals with data, analytics, evaluation and technology expertise who can be held accountable for improving agency capacity to utilize data and evidence to improve measurable results.

- *Focus attention within OMB on building relationships with state, local, and tribal governments.* Improvements in information access, use, and quality are often dependent on the willingness and ability of intergovernmental partners to participate in initiatives. Oftentimes, state and local governments receive mixed directions and redundant requirements from agencies, particularly on information reporting. In addition, OMB could work with agencies to devise ways to increase the capacity of state and local governments to use data to improve the administration of federal programs. Although a single agency is not in a position to resolve these issues, OMB is able to tackle these cross-agency discrepancies. When the federal government shows a willingness to work with state, local and tribal governments and listen to some of the big issues that are caused by a lack of federal coordination, everyone benefits when that results in better program administration and measurably improved outcomes for benefit recipients.

- *Devise a process for future OMB reform planning with the National Academy of Public Administration and the National Academies of Sciences, Engineering, and Medicine.* OMB leadership could call for the National Academy of Public Administration and/or the National Academies of Sciences, Engineering, and Medicine to support convenings to plan for further reforms. As independent, nonpartisan, and nonprofit organizations chartered by the U.S. Congress to improve government performance and scientific progress, respectively, these entities could serve as partners with OMB leaders to facilitate

multi-stakeholder dialogues and plans for further organizational change that may be needed at OMB in coming years.

CONCLUSION

OMB is a critical linchpin for the achievement of important policy priorities across government. OMB's operations and effectiveness can be significantly improved, just as OMB expects every federal agency to adapt and improve. Cultural and organizational barriers that impede OMB's success on informational policy can be addressed. Resources currently divided among the management, budget, and information and regulatory policy functions of OMB can be better coordinated. Improving OMB's role in information policy and utilization is a necessity for effectively accomplishing the administration's goals in 2021 and beyond.

OMB is an essential institution that should not run on 'auto pilot' just because the nation is in crisis. On the contrary, the crisis demands that OMB undertake change to raise its and government-wide attention to information and program evaluation matters. The time for change is now so the country can make meaningful improvements in people's lives sooner rather than later.

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