

# NOAA Response to the DAARWG Recommendations on the NOAA Data Strategy Implementation Plan Draft Actions

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## 1.0 Summary

The NOAA Science Advisory Board's Data Archiving and Access Requirements Working Group (DAARWG) provided NOAA comments on the draft NOAA Data Strategy Implementation Plan. The DAARWG's recommendations were provided to the EDMC in March 2021 after reviewing the "NOAA Data Strategy Implementation Plan Draft Actions document" (dated 1/11/2021). Since that time, the NOAA Environmental Data Management Committee (EDMC) and the implementation plan writing team have developed and approved the final document, now titled the "NOAA Data Strategic Action Plan (NDSAP)". NOAA has addressed the comments and recommendations from the DAARWG within the NDSAP and has taken steps to implement actions within the NDSAP including transitioning the EDMC to the NOAA Data Governance Committee (DGC), and establishing Line Office (LO) Assistant Chief Data Officers (ACDOs). NOAA views the approval of the NDSAP, initiation of the DGC, and establishment of LO ACDOs as crucial steps towards effective enterprise data governance and maximizing the value of NOAA's data.

## 2.0 NOAA Response to DAARWG Recommendations

**Recommendation 1:** The Plan should state who ultimately owns and evolves the Data Strategy for NOAA - is it the CDO, or another individual or body?

**NOAA Response:** The NOAA Chief Data Officer (CDO) is the senior executive responsible for the execution of the Data Strategic Action Plan. This is now included in the NDSAP introduction. The NDSAP states the following:

*"The NOAA Data Strategic Action Plan lays out how the NOAA CDO and existing bodies such as the NOAA Environmental Data Management Committee (EDMC), will make progress toward the goals and objectives of the Data Strategy while leveraging expertise and established groups in NOAA Line Offices and Staff Offices. The NOAA CDO will ultimately oversee the execution of the Data Strategic Action Plan. Goals 1 and 2 of the Data Strategy focus on establishing the NOAA CDO organizational structure, governance, and supportive processes within the line/staff offices to enable the execution of the actions in this plan. Therefore, the priority actions for the remainder of FY22–23 will advance these goals."*

**Recommendation 2:** The Plan should clarify the source of the CDO's budget and how it can be protected from cuts in future years.

**NOAA Response:** A discussion of the CDO budget was not included in the NDSAP as it was considered out of scope for the document. The NDSAP states the following relative to this point:

*“Goal 1 aligns NOAA enterprise data governance roles establishing collaborative leadership, empowered by policy and budget, with representation on NOAA’s strategic and decision-making councils and advisory boards.*

*Action 1) Establish the NOAA CDO organizational structure.*

*Milestones and Deliverables:*

*A. Define the roles and responsibilities of the NOAA CDO.*

*B. Establish a budget for the NOAA CDO to ensure the resources are available to perform the functions of the office.*

*Action 3) Formalize NOAA Line Office data governance and roles.*

*Milestones and Deliverables:*

*D. Assist Line Office leadership in defining budget and staffing requirements.”*

**Recommendation 3:** Having the CDO represented on every NOAA council and committee that has a "data connection" might stretch the office too thin, and would not necessarily reduce stovepiping unless the CDO is empowered to approve or correct work by those other bodies. Carefully consider which groups should actually have CDO representation, and ensure all groups follow existing and future data-related policies.

**NOAA Response:** The CDO is an official member of the CIO and Observing System Councils, as well as a participant in other NOAA councils and committees. The NOAA CDO proposed a plan to establish Line Office Assistant Chief Data Officer (ACDO) positions to lead Line Office data governance requirements and report up to the NOAA CDO. This has been briefed and approved by the NOAA CIO Council (and with each of the NOAA LO ACIOs), and the NOSC.

**DAARWG/SAB Comments applicable to Recommendations 4, 5 & 6:** “We are most concerned about the scope and function of the proposed Data Governance Body (DGB) and its relation to the existing Environmental Data Management Committee (EDMC). Having both DGB and EDMC may be confusing, counterproductive, and a dilution of resources. Also, we note that NOAA already has Councils and Committees, but does not seem to have any other "governance bodies." The Federal Data Strategy cited in Action 2.1 says data governance bodies "are commonly called by such names as Data Governance Boards, Data Councils, or Data Strategy Teams.”

**Recommendation 4:** Either (a) very clearly delineate the scope and relationship of DGB & EDMC, or (b) rename EDMC as DGB, or (c) recharter EDMC to include the functions and authority intended for DGB.

**Recommendation 5:** If a separate (non-EDMC) body is to be created, consider following established NOAA nomenclature and having it be called the Data Council; EDMC could then report to the Data Council instead of to both the NOAA Observing Systems Council and CIO Council as currently done.

**Recommendation 6:** Consider whether the CDO should be Chair ex officio of the Data Council, DGB, or EDMC, as appropriate.

**NOAA Response:** The EDMC has been rechartered as the NOAA Data Governance Committee (DGC). A new Terms of Reference was approved to clarify the scope, roles and responsibilities of the DGC. The new [Terms of Reference for the DGC](#) establishes the CDO as the DGC Chair. The transition from the EDMC to the DGC, as well as the establishment of LO ACDOs, is taking place in FY22Q3-4. The ToR was approved by the EDMC, CIO Council, and the NOSC. The DGC will continue to report to the NOSC and the CIO Council.

**Recommendation 7:** How would the proposed "NOAA Open Data Plan" differ from the NOAA Plan for Public Access to Research Results (PARR Plan), issued in 2015 in response to the OMB Holdren Memo of 2013? NOAA seems to have already satisfied this Federal Data Strategy requirement, and has long been ahead of many other agencies. The Plan should avoid duplicating or rewriting past policies [with the NOAA Open Data Plan] unless there is an identified shortcoming with the prior documents.

**NOAA Response:** The NOAA EDMC Procedural Directives (PD) are dated back to 2008 and some have not been reviewed in 14 years. Given the new federal policies and legislation such as the Evidence Act and Geospatial Data Act, and the Federal Data Strategy's annual Action Plan, these PDs need to be updated. Due to the fact that OMB guidance on agency Open Data Plans is still pending, as well as the subsequent Commerce guidance that will be issued after OMB, NOAA's Action 3.2 to publish an Open Data Plan is on hold.

**Recommendation 8:** This "comprehensive NOAA data inventory, including standard metadata" seems to already exist, in the form of the NOAA Data Catalog established in ~2016 at (<https://data.noaa.gov/dataset>) and designed to be harvested by data.gov. The Plan should avoid duplicating past actions or reinventing past methods [with the data inventory] unless there is an identified shortcoming with the prior approach.

**NOAA Response:** The NOAA Data Catalog is the harvesting site for NOAA data to data.gov. However, due to several issues and complications with the harvesting, a task team is being stood up by the CDO and DGC to address what the next steps should be.

### 3.0 Conclusion

NOAA has addressed the comments and recommendations from the DAARWG in the final NDSAP. Implementation of the NDSAP is underway, including transitioning from the EDMC to the DGC. NOAA views the approval of the NDSAP, initiation of the DGC, and establishment of

the LO ACDOs as crucial steps towards effective data governance and maximizing the value of NOAA's data.