

Comment from Senior Fellow John Kamensky on *Identifying and Reducing Burdens in Administrative Processes*
November 1, 2023

Recommendation 19. Revise.

Suggest the following revision to Sentence 2:

“In particular, agencies’ program and legal staff should work with their agencies’ chief data officer to collaborate on ways to share data

Recommendation 20. Delete.

The recommendation does not specify the purpose or audience for measures and documentation of effects of data sharing. Suggest it be deleted. While measuring and documenting is something that should be promoted in theory, in this case it could be a practical deterrent to efforts to collaborate.

Recommendation 21. Revise.

Suggest the following revision: “Agencies should work with their chief data officers to establish”

For support for this revision, see recommendations by the Federal Chief Data Officers Council, Data Sharing Working Group:
https://resources.data.gov/assets/documents/2021_DSWG_Recommendations_and_Findings_508.pdf