Six Steps to Improve Federal Government Performance on Data Disaggregation

Action Framework and Best Practices for SPD 15 Implementation

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AAPI DATA
DATA·NARRATIVE·ACTION

NCAPA
NATIONAL COUNCIL OF ASIAN PACIFIC AMERICANS

with consultation from:

SEARAC

EPIC
EMPOWERING PACIFIC ISLANDER COMMUNITIES

ASIAN AMERICANS ADVANCING JUSTICE
AAJC

Background

In March 2024, the federal government made significant changes to improve data collection on race and ethnicity that affect all federal agencies.[1] One critical pillar of this announcement is making detailed reporting categories, such as Vietnamese, Samoan, Lebanese, and Mexican the default expectation for all federal data collections. The rationale provided by the Office of Management and Budget (OMB) in making these changes is to ensure more accurate and useful race and ethnicity data across the federal government and to better reflect the diversity of our nation.

We refer to this component of the SPD 15 announcement as the "data disaggregation pillar," a decades-long priority for many racial groups including for Asian Americans, Native Hawaiians, and Pacific Islanders. In April 2024, AAPI Data and the National Council of Asian Pacific Americans (NCAPA), in consultation with the Southeast Asia Resource Action Center (SEARAC) and Empowering Pacific Islander Communities (EPIC), published a policy report focused on the timely and successful implementation of the data disaggregation pillar.[2] The report addressed observed gaps in the SPD 15 announcement, immediate short-term recommendations that should be adopted, and a series of key data principles for effective SPD 15 implementation. In short, these principles include:

1. **Monitoring SPD 15** progress across all federal agencies,
2. Providing a **formal and regular role for community input and expertise**,
3. Providing **greater transparency** into the SPD 15 implementation process,
4. Making **federal data more accessible** to the public, and
5. **Providing necessary funding** to support federal agency implementation.

Based on subsequent meetings with OMB, the Chief Statistician of the United States, and Congressional members and legislative staff, the partner organizations identified critical areas needing prioritization for the successful development of federal agency action plans by September 2025 as specified in OMB's March 2024 Update to SPD 15. In an addendum to the report published on July 26, 2024, the co-authors identified the following priority areas for the development of federal agency action plans, and for stronger coordination of SPD 15 implementation by OMB:[3]

- Creating **transparency** on the SPD 15 Action Plan and implementation process
- The necessity of a **centralized data inventory** for SPD 15 implementation
- Addressing issues of **agency exemptions** to SPD 15 compliance that could lead to less than 100% compliance, and
- The critical importance of involving the end beneficiary through **public engagement**.

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[1] Office of Management and Budget, "Revisions to OMB's Statistical Policy Directive No. 15: Standards for Maintaining, Collecting, and Presenting Federal data on Race and Ethnicity," Federal Register 89, no. 62 (March 29, 2024): 22182, https://www.federalregister.gov/d/2024-06469

[2] AAPI Data and National Council for Asian Pacific Americans, with Southeast Asian Resource action center and Empowering Pacific Islander Communities. Strengthening the Federal Government's Data Disaggregation Pillar: Key implementation recommendations for 2024 revisions to detailed race and ethnicity standards under Statistical Policy Directive 15. Riverside, CA and Washington, DC April 2024. https://aapidata.com/action/spd15-report/

[3] *Id* at Addendum 1

From July through September 2024, staff from AAPI Data, National Council of Asian Pacific Americans (NCAPA), and several coalition members of NCAPA — SEARAC, EPIC, Asian Americans Advancing Justice-AAJC, National Coalition For Asian Pacific American Community Development (National CAPACD), Asian Real Estate Association (AREAA), and national partners such as National Asian Pacific American Women's Forum (NAPAWF) — met with senior leadership in several federal agencies as well as with key OMB officials who are responsible for coordinating implementation on SPD 15 implementation across federal agencies.

Based on insights gained from these meetings, we have developed a framework and set of "best practice" recommendations that are realistic, achievable, and will ensure successful and timely implementation of the data disaggregation pillar in SPD 15. We are also publishing a companion tool to ensure the successful development of federal agency action plans and successful implementation of data disaggregation within a five-year time frame.[4]

Action Framework and Best Practices

In order to move from the aspirations of successful implementation — as laid out in the April 2024 SPD 15 Report and the July 2024 Addendum published by a coalition of AANHPI-serving organizations — to the pragmatic realities of implementation, we advance the following framework and specific set of best practices and feasible steps for incorporation into agency action plans by the September 2025 deadline, and full implementation by the March 2029 deadline.

This framework was developed after initial conversations with federal agencies on SPD 15 implementation, and in consultation with publications produced by the Performance Improvement Council (PIC), a federal government-wide body that supports cross-agency collaboration and best practice sharing.[5] The PIC assists the Director of OMB to improve the performance of the federal government and achieve the federal government priority goals.

SPD 15 and the collection of more granular information on ethnicity is not collecting additional data for data's sake. An important aspect of SPD 15 and its successful implementation is centering the proposition that more accurate data is foundational for evidenced-based policymaking. Evidence is broad-based and includes foundational fact finding, performance measurement, policy analysis, and program evaluation. We have provided the following framework for federal agency implementation. The purpose of the framework is threefold:

- Provide a centralized playbook for **federal agencies** to adopt and makes clear the process and methodology to focus on the timely and successful implementation of SPD 15.

- Provide a common framework that eases the burden that **community and non-federal stakeholders** will hold in coordinating their engagement across multiple federal agencies.

- Provide **OMB** a systematic framework to evaluate the rigor of federal agency plans, develop technical support and additional resources to support agencies where needed, and identify best practices on this five-year path.

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[4] NCAPA and NCAPA member organizations are developing a set of federal agency "one pagers" that shows how, and why, data disaggregation on key datasets within each agency is critical to ensuring that all AANHPI communities are well served. AAPI Data is working on an "indicator framework" for agency progress that will serve as the basis for future Key Performance Indicators and transparent markers of progress that can be shared publicly via agency and OMB dashboards. As the work of SPD 15 progresses, we anticipate adding more federal agency "one pagers" and updating the indicators framework based on ongoing feedback from a variety of stakeholders, including agency officials, scientific experts, and community experts.
[5] "The PIC supports cross-agency collaboration and sharing of promising practices to improve Federal program and service delivery for the American people. Its role is to advance and expand the practice of organizational performance management and improvement across the Federal Government." For more details see https://www.performance.gov/pic/

Developing Federal Agency Action Plans

I. Build the Federal Agency SPD 15 Implementation Team

The success of SPD 15 will be dependent on forming a group of senior leaders who are committed to providing vision and support, and being an ambassador both internally and externally for the goal. These leaders must delegate authority to others to make decisions and take action. SPD 15 specifically names the Chief Data Officer, Evaluation Officer, and Senior Agency for Privacy as leads in developing and submitting these plans by September 29, 2025.

We encourage agencies to consider adding additional senior leaders to this cohort including a representative to engage with key non-federal stakeholders identified in Section III(A) below. Additionally, career staff will play a critical role with SPD 15 implementation and an agency scan should be undertaken to involve individuals who will be carrying out this work. Lastly, measures to incentivize and hold accountable staff for successful completion of this work must be formulated, communicated early, and regularly followed up on throughout the five-year time horizon.

IMPLEMENTATION CHECKLIST

- [ ] Identify and gain commitment of one or more senior leaders who will help prioritize and enforce the SPD 15 priority throughout each agency
- [ ] Develop an SPD 15 leadership team to oversee the work
- [ ] Identify and create a list of career staff who will be involved, with initial estimates of their time and availability
- [ ] Develop team incentives and accountability mechanisms: (e.g. inclusion in annual performance plans, required presence active role in meetings, regular check-ins with senior leaders)

II. Assess the Strategic Context of Data Policy

According to OMB, "Federal agencies often lack the data and evidence necessary to make critical decisions about program operations, policy, and regulations, and to gain visibility into the impact of resource allocation on achieving program objectives."[6] In order to better understand how data infrastructure, policies, and practices relate to primary and secondary agency goals, federal agencies must assess both the challenges and opportunities that arise from existing statutes and regulations, anticipated changes in funding, and investments needed for effective implementation. While this initial analysis will likely change over time with new information, it will provide a necessary starting point to assess how the federal agency team is developing strategies and priorities to address issues raised by factors that include changes in technology, legislation, administration priorities, and community priorities.

IMPLEMENTATION CHECKLIST

- [ ] Identify and document key challenges to accomplish SPD 15
- [ ] Identify and document the opportunities in accomplishing SPD 15
- [ ] Develop an initial risk assessment in implementing SPD 15

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[6] See Appendix A, Memorandum for Heads of Executive Departments and Agencies, Phase 1 Implementation of the Foundations for Evidence-Based Policymaking Act of 2018: Learning Agenda, Personnel, and Planning Guidance, Russell T. Vought, July 10, 2019.

III. Identify and Engage Key Stakeholders

Understanding the ecosystem of players involved and affected by SPD 15 will assist in developing better and coordinated efforts towards implementation. Public participation results in better decision-making, outcomes, and governance, as it allows decision makers to operate from a place of more complete information. As stated in the original policy report by AAPI Data and NCAPA pertaining to SPD 15, "meaningful engagement improves relationships and trust between the public and decision makers."

Stakeholders will be similar and different across federal agencies due to variances in issue areas, but ensuring the inclusion of the following stakeholders: those individuals within each federal agency, those across federal agencies where data is shared, end users, data providers (including third parties), industry and scientific researchers, and community based organizations should be included as a baseline. NCAPA, and its members, are key organizations for the AANHPI community and should also be included in this list. The number of stakeholders will increase as agencies prod stakeholders to share those who should be included, and will build the knowledge base and trust in the process and result.

We recommend review of the OMB memorandum on this topic for additional background on the importance, common impediments, and proposals for meaningful community engagement.[7] Engagement with the community should include the following: webinars, focus groups, surveys, end user workshops, publication/notice in the federal register notice with adequate time for community response, additional outreach after federal register notice release to ensure marginalized communities are aware and understand how to respond, and listening sessions. These engagement opportunities should take into consideration community barriers such as limited English proficiency, disability, location, and timezones for AANHPI communities, some of whom are in Hawaii and the Pacific Islands.

> **IMPLEMENTATION CHECKLIST**
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> ☐ Develop a underlined stakeholder map of those entities who have a stake in SPD 15 implementation. Include descriptions of each group, roles, and how they relate to other stakeholders.
>
> ☐ Meaningfully engage with the AANHPI community, as well as industry and scientific researchers who work on data equity for input and expertise to understand data needs and specific data set prioritization. For all stakeholders (e.g data providers, data vendors, data users), develop customer journey maps.

IV. Create a Federal Agency Data Inventory and Progress Indicator

Data inventories ensure that federal agencies and the public have a clear and robust understanding of the data in possession of an agency, and are foundational to any data management program. Data inventories allow stakeholders to quickly find, access, and utilize data and aid program managers to determine if they are meeting mission priorities. This component is so critical to the effective management of federal success that Congress saw fit to require all federal agencies to create a comprehensive data inventory under the Foundations for Evidence-Based Policy Making Act of 2018 (Evidence Act).[8] Metadata included in the data inventory should include descriptors pertaining to detailed race/ethnicity to ensure an appropriate baseline to measure progress on SPD 15. The Data Inventory Working group of the Chief Data Officer Council has created a report entitled Enterprise Data Inventories to highlight the value for data inventories and outline challenges agencies may face in implementation and management.[9]

[7] Memorandum For The Heads of Executive Departments and Agencies, Broadening Public Participation and Community Engagement in the Regulatory Process, Richard L. Reves, July 19, 2023.
[8] The Foundations for Evidence-Based Policymaking Act (or OPEN Government Data Act, Pub.L. 115-435)
[9] Enterprise Data Inventories, Chief Data Officer Council's Data Inventory Group, April 2022 https://resources.data.gov/resources/CDOC_Data_Inventory_Report/

Once this baseline is adopted, an indicator should be added to federal agency websites that monitors ongoing progress in SPD 15 implementation by total number of data sets that are in compliance, and naming those specific data sets for easier public consumption.

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IMPLEMENTATION CHECKLIST

☐ Create a federal agency data inventory that includes metadata on datasets that collect information on race and ethnicity.

☐ Develop and publish an indicator on federal agency websites that monitors a) ongoing progress on SPD 15 implementation compared to all data that collects information on race/ethnicity and b) naming those specific data sets that are in compliance.

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V. Identify Strategies that Translate Goals to Outcomes

Recognizing that the goal is clear (SPD 15 implementation Agency Action Plans due in September 2025, and full implementation by the March 2029 deadline) and understanding the ecosystem and players, the next step is mapping out what efforts will look like in meeting these goals. Government and industry practices indicate that strategies that follow SMART goal principles (SMART is an acronym that stands for Specific, Measurable, Achievable, Realistic, and Timely) are more likely to succeed than strategies that are aspirational in nature without the requisite levels of specificity and accountability.[10]

In addition, it is noteworthy that building and using evidence to improve government effectiveness is a Management Priority that requires agencies to drive significant progress and change. Agency Priority Goals (APG) statements are outcome-oriented, ambitious, and measurable with specific targets set that reflect a near-term result or achievement agency leadership wants to accomplish within approximately 24 months.[11]

Key questions include:
- How will each federal agency move the goal from where it is currently situated to the targeted state?
- Will new structures or processes need to be created?
- Are there underlying issues that need to be addressed to ensure success?
- What evidence do we have that the approaches to the issue will have the intended effect?
- Will it be necessary to create phases of work to ensure success?
- How might we accelerate progress through partnerships with other entities including non-federal partners?

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IMPLEMENTATION CHECKLIST

☐ Diagram the goal, including sub goals and strategies to ensure work is aligned to achieve the desired outcome (e.g. create a logic model or theory of change)

☐ Develop a chart of key strategies that make up the goal

☐ Provide opportunity for regular community/expert feedback to iterate on strategies

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[10] See generally https://www.performance.gov/about/performance-framework/
[11] See https://www.performance.gov/about/performance-framework/#apg

VI. Measuring Progress

Key to effective implementation of data disaggregation within each agency, and across agencies, is the development of milestones, measures, and targets that bear a close relationship to goals, strategies, outputs, and outcomes. These specific measures will act as a barometer to show 1) progress in the right direction, and 2) the necessary pace to ensure completion by the five-year time horizon. Creating interim 'checkpoints' throughout the five-year implementation timeline can be utilized to make necessary adjustments to this framework.

Since SPD 15 is an "all of government" approach to data disaggregation, these performance indicators need to balance the need for standardization of indicators across agencies, while at the same time enabling a meaningful level of customization within each agency, and specific to each agency's action plan.

Key questions include:
- What are important, interim progress benchmarks that will be achieved along the 5 year time horizon? How will agencies know that these have been met?
- What milestones will be created that will ensure momentum on SPD 15 implementation?
- Are the milestones clear and measurable?
- Which measures will tell us about our progress?
- How will we measure the effectiveness of our strategies and tactics?
- What are measures to utilize for internal management, with third-party data providers, and for the community?
- Which measures are outcomes-focused? Which ones are output-focused?
- For each measure, what is the reporting frequency?

IMPLEMENTATION CHECKLIST

☐ Develop a milestones calendar that will keep the goal on track

☐ Ensure buy-in on measures used to track progress (see section III. 'Identify and Engage Key Stakeholder' section above)

☐ Create a framework to measure stakeholder satisfaction throughout the process

AAPI Data

AAPI Data is a leading national research and policy organization producing accurate data and supporting community narratives that drive action toward enduring solutions for Asian American, Native Hawaiian and Pacific Islander (AANHPI) communities. We aspire to transform public and private systems to ensure that all AANHPI communities are recognized, valued, and prioritized. To learn more, visit www.aapidata.com.

National Council of Asian Pacific Americans (NCAPA)

The National Council of Asian Pacific Americans (NCAPA), founded in 1996, is a coalition of national Asian Pacific American organizations around the country. Based in Washington D.C., NCAPA represents the interests of the greater Asian American (AA) and Native Hawaiian Pacific Islander (NHPI) communities and is a national voice for AA and NHPI issues. Learn more at ncapaonline.org.

Southeast Asia Resource Action Center (SEARAC)

SEARAC is a national civil rights organization that builds power with diverse communities from Cambodia, Laos, and Vietnam to create a socially just and equitable society. As representatives of the largest refugee community ever resettled in the United States, SEARAC stands together with other refugee communities, communities of color, and social justice movements in pursuit of social equity. Learn more at searac.org.

Empowering Pacific Islander Communities (EPIC)

EPIC is a pro-Black, pro-indigenous and anti-racist national advocacy organization based in Los Angeles that was established in 2009 to advance social justice for Native Hawaiians and Pacific Islanders (NHPIs) in the U.S. diaspora through culture-centered advocacy, leadership development, research, and narrative change. Learn more at empoweredpi.org.

Asian Americans Advancing Justice | AAJC

Asian Americans Advancing Justice | AAJC has a mission to advance the civil and human rights of Asian Americans and to build and promote a fair and equitable society for all. We build political power by increasing the voting power of the Asian American electorate at the regional and national level. To learn more, visit advancingjustice-aajc.org.

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