Open Data Publication Process

**Internal Clearance Processing**

The EIDM team has collaborated with representatives of the GSA Office of General Counsel (OGC), the GSA Freedom of Information Access Office (FOIA) and the GSA Privacy Officer to develop an internal clearance process for GSA datasets prior to their release. We agreed that our goal is proactive disclosure of datasets but we will ensure that the clearance process has risk mitigation included. The process that has been implemented includes:

* Program Manager, the data owner, will approve the dataset and metadata for public release and seek approval from their management. Associate Administrator within the SSO will provide approval to the SSO Portfolio Data Manager (PDM). The PDM is assigned by the SSO management as an SSO liaison to the DMWG.
* If Datasets contain other agencies’ data, the SSO will need to coordinate approval/concurrence by Office of Management and Budget (OMB)
  + Datasets must be sent through GSA's internal clearance processing whether or not the datasets have been approved for release by OMB.
  + If the OMB does not concur to publish the dataset, the dataset will be included in the GSA Enterprise Data Inventory and posted on MAX portal but not posted at www.gsa.gov/data with other public datasets.
* Datasets, along with a spreadsheet containing the metadata, should be sent directly to the FOIA office and cc: [opendata@gsa.gov](mailto:opendata@gsa.gov) by the PDM or member of the DMWG.
* FOIA Officer will forward to OGC through the GSA FOIA system. OGC will coordinate with the GSA Privacy Officer.
* If OGC approves the dataset for release, then the PDM is notified by OGC. OGC closes out the FOIA entry.
* The PDM will prepare the datasets for release and notify the SSO data owners and DMWG.

**Access Level Determination**

Through consultation and coordination with the [GSA FOIA office](http://www.gsa.gov/portal/category/21416), OGC and Chief Privacy Officer, the decision was made to first use the [GSA FOIA exceptions](http://www.gpo.gov/fdsys/pkg/CFR-2013-title41-vol3/pdf/CFR-2013-title41-vol3-sec105-60-501.pdf) as a basis for initial access level determination. These FOIA exemptions are consistent governmentwide, not solely a GSA policy. Additional privacy analysis is performed within the FOIA, OGC and Chief Privacy offices to ensure Personal Identifiable Information (PII) is not disclosed through the release of a data asset, and that the “mosaic effect” will not create additional security and privacy concerns. The reviewers will document in the Enterprise Data Inventory the reasons for the restricted and private access level determinations.