

Implementing OMB M-25-05 in Wildland Fire Data Management

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INTERAGENCY WILDLAND FIRE DATA MANAGEMENT PROGRAM

Agenda

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EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET
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M-25-05

MEMORANDUM FOR HEADS OF EXECUTIVE DEPARTMENTS AND AGENCIES

FROM: Shalanda Young
Director

SUBJECT: Phase 2 Implementation of the Foundations for Evidence-Based Policy
Act of 2018: Open Government Data Access and Management

1. INTRODUCTION

This Memorandum provides guidance on data management and dissemination for the Foundations for Evidence-Based Policy Act of 2018 ("Evidence Act"). This systematic approach to open data that will better facilitate data access for evidence-based policy will foster innovation in artificial intelligence and beyond, inform research, improve government transparency and accountability, subject to appropriate safeguards for confidentiality, and security.

The Evidence Act sets forth statutory requirements regarding Federal Government activities, open government data, and confidential information protection. Title II of the Evidence Act, also referred to as the Open, Public, and Efficient Government Data Act ("OPEN Government Data Act"), sets forth the quality, accessibility, protection, and other aspects of the Executive Branch's data management and new requirements.

Historical Context

- OPEN Government Data Act 2019 (S.760 / H.R. 1770)
- Foundations for Evidence-Based Policymaking Act 2019 (P.L. 115-435)
- Federal Data Strategy (February 2020)
- **Phase 2 Implementation of the Foundations for Evidence-Based Policymaking Act of 2018: Open Government Data Access and Management Guidance (OMB M-25-05)**

M-25-05 Requirements

- Manage data as “open by default”
- Create a **comprehensive** data inventory
- Publish on Data.gov catalog
- Align metadata with DCAT-US 3.0
- Maintain open data plans and public engagement

What does
“open by
default”
mean?

Unless precluded by security, privacy, intellectual property restrictions, data collection and dissemination should be:

- Managed and shared in an open format
- Maintained as an open Government data asset
- Assigned an open license

Details (p. 6)

Open format

- File format is platform independent and machine readable
- No cost (no proprietary software required)
- Format does not prevent copying, publishing, distributing, transmitting, citing, or adapting content

Public data asset

A data asset, or part thereof, maintained by the Federal government that has been, *or may be*, released to the public, including any data asset, or part thereof, subject to disclosure under 5 USC 552.

Open Government data asset

A public data asset that is

- Machine readable
- Available or can be made available in an open format
- Unrestricted reuse, unless protected by intellectual property rights
- Based on an underlying open standard

Open license

A legal guarantee that a data asset is made available

- At no cost to the public
- With no restrictions of copying, publishing, distributing, transmitting, citing, or adapting such asset, unless intellectual property rights apply

What does
“comprehensive”
mean?

A comprehensive data inventory that “Accounts for all data assets created by, collected by, under the control or direction of, or maintained by the agency, with the exception of data assets contained on a national security system” (p. 7)

“Agencies must ensure that the comprehensive data inventory is clear and allows the public to understand all data assets in the possession of the agency.”

Details

Shared assets (p. 7)

“Data assets that are in the possession of, or shared by, more than one agency are required to be listed independently by each agency possessing those assets on the agency’s comprehensive data inventory.”

Reporting (p. 7)

“Agencies must update the comprehensive data inventory no later than 90 days after the date on which the agency creates or identifies a data asset.”

Removal from inventory (p. 11)

“Agencies should establish processes to remove references to data assets that have been dispositioned pursuant to applicable records retention and disposition policies.”

What is a
public data
asset?

“the act defines the term *public data asset* as ‘a data asset, or part thereof, maintained by the federal government that has been, or may be, released to the public, including any data asset, or part thereof, subject to disclosure under section 552 of title 5. the term *public data asset* is not limited to those data assets that have been or will be released publicly. In fact, many data assets that qualify as public data assets may not become publicly available...” (p. 13)

Clarifying language (p. 19)

“Data assets in the possession of an agency must be listed in the agency’s comprehensive data inventory...However, not all public data assets should be disseminated to the public through the Federal Data Catalog.”

“All public data assets are eligible for public dissemination, but not all public data assets are appropriate for public dissemination via the Federal Data Catalog.”

- Asset must be reported via metadata to agency inventory
- Inventory listing does not have to provide a distribution link or instructions to data if non-dissemination is legally justifiable, data are characterized as “non-public,” and described with cited authority in the metadata submitted to the inventory
- “Appropriate for dissemination” is an assessment of risk with respect to national security, privacy laws, confidentiality, and intellectual property, as well as possibility for mosaic effect. (p. 20).
- “When determining the level of risk that may be appropriate to accept, the agency may consult its risk management strategy...” (p. 20)

Clarifying language (p. 23-24)

“When an agency determines that a portion of a public data asset should not be disseminated based on [risks], the agency should consider disseminating the remainder of the public data asset through the Federal Data Catalog. In doing so, agencies should remove or redact only the minimum amount of data necessary to make the data asset suitable for dissemination....In this circumstance where an agency disseminates a modified version of a data asset after applying information limiting techniques, the agency should consider listing the modified data asset on their comprehensive data inventory as a separate entry from the original non-public or restricted data asset.”

What assets
are in scope?

In scope

All new information collections and IT investments (p. 4)




“...a plan should be developed by agencies to convert established data sets, and data sets currently being collected, that are not already in an open format to open formats as soon as practicable” (p. 4)



What is this
happening?

Timelines

(p. 32)

ACTION	TARGET	SCHEDULE
Update schema (to DCAT-US 3)	180 from issuance (7.15.25)	
Contact info for the open data plan prominently displayed on agency website	180 from issuance (7.15.25)	
IRM Strategic Plan updated with open data plan	180 from issuance (7.15.25)	
Comprehensive data inventory data asset listings updated to DCAT-US 3 schema	9.30.26	
Comprehensive data inventory hosted publicly on the agency's website at www.doi.gov/data.json	9.30.26	

Timelines

(p. 32)

ACTION	TARGET	SCHEDULE
All agency data assets represented in the comprehensive inventory	9.30.26	
Data assets meet open format requirements	9.30.26	
Public data assets meet open Government data asset and open license requirements	9.30.26	
Public engagement conducted for releasing public data assets	9.30.26	

DCAT-US 3.0 Modernization

Updated metadata structure and requirements

Supports automation and discoverability

DOI participating in federal working groups

Emphasis on variable level clarity and lineage

What This Means for Wildland Fire Data

- Need to inventory all datasets
- Metadata modernization required
- Review/catalog historically non public datasets
- Automate metadata publishing

Gap - Metadata Not Flowing to Data.gov

Interagency datasets not pushed to Data.gov

Limited discoverability

Blocks full M-25-05 compliance

Interagency Metadata Profiling Support

Clarify shared Interagency stewardship

Ensure consistent dataset representation

Support interagency DCAT US profiling

Shape a shared publishing approach

The Road Ahead

Compliance is part of modernization

Wildland fire is positioned to lead

Collaboration across agencies is essential

Early engagement reduces future workload