



October 24, 2017

Lynn Scarlett
Chair, NOAA Science Advisory Board
Managing Director for Public Policy, The Nature Conservancy
The Nature Conservancy
4245 N. Fairfax Drive
Arlington, VA 22203-1606

Dear Ms. Scarlett,

Thank you for the review of the NOAA Policy on Partnerships in the Provision of Environmental Information ("Partnership Policy"), conducted by the Environmental Information Services Working Group (EISWG) of the NOAA Science Advisory Board. NOAA is appreciative of the thoughtful work of the EISWG, and remains committed to partnerships that advance our mission and benefit our stakeholders and the public.

NOAA recognizes the need to update the Partnership Policy in light of the many changes that have occurred since it was first developed. We envision a future Partnership Policy that is more reflective of the current state of the Agency and more supportive of NOAA's collaboration with public, private, and academic institutions.

NOAA has undertaken a review of the recommendations provided by the Science Advisory Board and is pleased to provide the following responses:

Recommendation 1. Expand the current policy beyond the "provision" of environmental information to include "acquisition and creation," thus changing the focus and title to NOAA Partnership in Support of Environmental Information and Services.

Response: NOAA agrees with this recommendation, and recognizes the value of expanding the Partnership Policy to address the acquisition of environmental information from non-federal sources. NOAA is committed to extending our use of academic and commercial models, tools and observing systems.

We note, however, that as we seek to extend our use of information from outside sources, we must do so carefully to ensure that federal legal guidelines are met. The methods by which NOAA currently acquires non-federal data are governed by a robust body of laws, regulations, policies and procedures, which are designed to ensure equity among providers -- it is imperative



that NOAA continue to act consistently with these requirements. Moreover, NOAA must ensure that the Partnership Policy does not conflict with regulatory responsibilities carried out under other laws under its purview, such as the Magnuson-Stevens Fishery Conservation and Management Act and the National Marine Sanctuaries Act.

As NOAA moves forward to revise its Partnership Policy, it looks forward to receiving input from the SAB and EISWG on how best to acquire environmental information from outside sources within the existing legal framework.

Recommendation 2. Clarify the ambiguity throughout the Policy regarding the use of “information” versus “information services.”

Response: NOAA agrees with this recommendation, and acknowledges that there are key terms in the Partnership Policy that must be defined to ensure clarity. As NOAA revises the Partnership Policy it will adjust language to ensure that appropriate terms are used.

Recommendation 3. Establish a sustained and consistent effort to ensure that NOAA employees, especially those in leadership positions, are knowledgeable on the intent, provisions and implementation of the Policy.

Response: NOAA agrees with this recommendation, and is committed to ensuring that all of its employees, including leadership, are knowledgeable on the intent, provisions and implementation of such Partnership Policy. Systematic and routine communication and outreach with NOAA personnel will be key to the success of the Partnership Policy. We are continuing to examine the best methods to achieve successful implementation of the Partnership Policy, and look forward to working with the SAB and EISWG as we work through this process.

Recommendation 4. Define and communicate key terms in the Policy.

Response: As noted, NOAA agrees with this recommendation, and is committed to clearly defining key terms in the revised Partnership Policy.

Recommendation 5. Establish the proposed NOAA-wide Environmental Information Services Committee (EISC) to serve as the lead internal entity to address conflicts and disagreements within NOAA and with non-NOAA entities, guide the Policy’s implementation, and oversee agency-wide awareness and training around the Policy.

Response: NOAA fully agrees with the objective of this recommendation, and is committed to ensuring robust implementation of the Partnership Policy across NOAA. While we are supportive, in concept, of the establishment of an Environmental Information Services Committee (EISC), we continue to explore options for the best means of implementing the Partnership Policy, with a focus on the scope and governance authority of any new committee or organizational body created for this purpose.

Again, I want to thank EISWG for its thoughtful and constructive recommendations regarding the Partnership Policy. NOAA looks forward to collaborating with the SAB and EISWG in the future as it continues to develop an update Partnership Policy.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Ben R', with a long horizontal flourish extending to the right.

Benjamin Friedman
Deputy Under Secretary for Operations
Performing the duties of Under Secretary
of Commerce for Oceans and Atmosphere
and NOAA Administrator

cc: Bob Winokur
John Snow
Steve Volz
Craig Mclean
Louis Uccellini
Peyton Robertson
Andrea Bleistein
Cynthia Decker