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SAP America ("SAP") appreciates the opportunity to submit comments on the Office of Information and Regulatory Affairs recommendations on how to broaden public engagement in the regulatory process as a follow-up to the Fifth U.S. Open Government [National Action Plan](#). SAP is very supportive of the plan's commitment to increase public engagement in the regulatory process.

Who We Are

SAP America is the domestic subsidiary of SAP SE, the world leader in enterprise software applications and software-related services. SAP SE supports more than 400,000 global customers, with approximately 76 percent of global commercial transactions flowing through SAP software; 91 percent of the Forbes Global 2000 companies rely on SAP software. SAP innovations assist our customers globally in improving efficiencies and the delivery of services to their customers.

Beyond the private sector, SAP currently supports national, regional, and local government enterprises around the world. Over 15,000 public sector customers in 130 countries run SAP. We help government agencies improve efficiency and transparency by simplifying and expanding the use of data analytics across agencies to improve performance and to enhance the lives of the citizenry that they serve.

Engaging the Public in the Regulatory Process

SAP fully supports the federal government improving engagement with the public in the regulatory process. SAP believes industry engagement and participation is vital in any IT modernization and open data related initiative.

SAP recommends developing a process that allows for active participation and feedback by non-federal stakeholders as the Office of Management and Budget establishes a "cross-office Data Council that will coordinate across statutory offices on information policy development and implementation activities." Input from outside stakeholders will contribute new ideas and experiences to the Administration's efforts.

SAP suggests letting the public know, in as many ways as possible, when regulatory changes are being considered, and to provide as many opportunities as possible to receive feedback and hear from stakeholders. This could include a request for comments, stakeholder briefings, posting the information online, and disseminating the information to a cross section of stakeholders.

Simplifying Regulatory Guidance

SAP supports the recommendation to make regulatory material as concise and easy to understand as possible in machine readable online formats, while encouraging consistent metrics and tracking of the implementation.



Using Technology to Increase Stakeholder Involvement

In order to broaden equity and diversity in public engagement the government should continue to support increased broadband penetration across the country. SAP recommends using technology to review stakeholder engagement and current effectiveness in reaching a broad audience. Further, SAP supports encouraging agencies to study the effectiveness of their community engagement strategies and change what might not be working to increase stakeholder participation through actual metrics and digital tools.

SAP recognizes that federal agencies are under intense internal and external pressures which can have the potential to lead to delays in the implementation of new policies. SAP recommends that OMB create a citizen-centric publicly displayed digital dashboard to track in real-time the progress of each federal agency in implementing commitments.

The more standardized metrics the government uses to track engagement, coupled with digital technology, the easier it will be to understand actual participation. SAP recommends identifying specific metrics that indicate the quality of the work done under a commitment. There should be some mechanism to gather quality, useful, relevant data that can really show if these commitments have achieved its goals to use and manage data to serve the American people.

The government could hold data innovation roundtables across the country to encourage data innovation and ways to increase the public and private sector's awareness of regulatory actions, as well as encouraging data innovation on key challenges such as sustainability and health.

Conclusion

In conclusion, SAP welcomes increased efforts by the U.S. Government to further open data and modernize the government's IT infrastructure.

Should you have any questions or need any additional information, please contact me directly or my colleague, Winter Casey, Senior Director of U.S. Government Affairs, at winter.casey@sap.com.

Thank you for your time and consideration.

Respectfully submitted,

Sincerely,

A handwritten signature in blue ink that reads "Kevin Richards".

Kevin Richards
Vice President and Head of U.S. Government Affairs

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