Montana Office of Public Instruction K12 Data Governance Manual

Contents

INTRODUCTION

Purpose

The Data Governance Manual is designed as a reference guide to help Montana Office of Public Instruction (OPI) employees become familiar with Data Governance as implemented by the Montana OPI and to inform them of associated responsibilities and processes. This manual should act a reference guide for committees including the Data Governance Committee, the Data Privacy and Security Committee, Core Data Stewards Committee, Ad-hoc Committees, Data Use Committee and the Data Request Review Committee.

This document outlines the structure of the Data Governance Program including critical roles and responsibilities. In addition to an overview of the Montana OPI Data Governance Program, this document includes guidance for each of the major roles: Data Governance Committee member, Data Privacy and Security Committee member, Core Data Stewards, Ad-hoc team members, Data Use Committee members, and the Data Request and Review Committee members.

Overview

Organizations have long had processes in place for managing financial and physical assets including equipment, money, land, personnel, etc. However, more and more organizations are recognizing the importance of managing data and information as an asset. The Montana OPI has implemented this Data Governance Program, in recognition of the critical nature that data plays in the "business" of education.

Relationship and Roles of Data Governance

The Montana OPI's Data Governance Program includes specific relationships among the components of the program and requires that Data Governance participants follow the defined escalation process for effective communication.

Escalation

OPI Data Stewards and Owners, Programmers, and any other employee tasked with sharing or collecting data have day-to-day responsibilities regarding these data. Any issues, changes or new requests that may arise related to these responsibilities must be escalated to the Data Governance Manager or Facilitator for review and assignment to the appropriate committee after consulting with the appropriate data owner and requestor. The Data Governance Committee may escalate issues to the Data Privacy and Security Committee or to Executive Leadership, which has ultimate responsibility for resolution if Data Governance cannot reach a consensus. For issues that may arise regarding a data request, escalation to the Data Privacy and Security Committee, then the Data Governance Committee, and finally to Executive Leadership, if necessary.

1.0   DATA GOVERNANCE COMMITTEE

1.1   Mission

The mission of the OPI Data Governance Committee is to establish and enforce policies related to agency data collection, management, and reporting.

Guiding Principles:
- Ethics and security will be a part of every decision the group makes.
- Members have the authority and commitment to make policy recommendations and decisions.
- Members will bear in mind legal considerations, including the Family Educational Rights and Privacy Act (FERPA), when making decisions.
- Members will consider data quality when making decisions.

1.2   Scope and Responsibility

The scope for the Data Governance Committee considerations include all data across the agency. This includes:

- All data collections
- Growth and Enhancement of Montana Students (GEMS) Data Warehouse (content, data releases and other issues that need committee feedback)
- Security and confidentiality of data
- Data quality
- Deadlines
- Communication regarding data and policy
- Establishing certification requirements
- Resolving data inconsistencies
- Ensuring awareness of data collection and reporting requirements for the OPI
- Proposing business rules as necessary
- Representing the perspectives of the various users of education data and providing feedback to the OPI on their needs and concerns
- Providing information on new collections and changes
- Ensuring business processes are documented and stored in an accessible location

1.3   Membership

The OPI Data Governance Committee is made up of Data Owners and others at the OPI with a high level of responsibility regarding data. Each data element that is collected and reported on is

assigned a Data Owner. The Data Owner is responsible for defining how data is defined, collected, quality assured and reported, as well as providing guidance on how to use it appropriately.

The Data Owner is responsible for and authorized to:
- Define and approve all access to information and computing assets under his or her responsibility.
- Judge the value of the data assets and identify the data classification.
- Annually review each application's data access and classification; communicate each application's data access requirements and data classification to the data steward; and safeguard the confidentiality, privacy and security of any information that has been entrusted to his/her team for business purposes.
- Certify their data for federal reporting and data releases in GEMS.
- Support collaboration across the data stewards.
- Ensure data collection and reporting are properly authorized.
- Be the first point of contact related to the various program areas for data issues and business rules.
- Collaborate with the data stewards to resolve or inform on data issues.
- Provide approval to the data steward when the data is accurate and ready to be certified and reported to Ed Facts based on the Ed Facts File Submission plan.

1.4   Member responsibilities

 All members of the Data Governance Committee are responsible for:

- Attending and participating in scheduled Data Governance Committee meetings. If a member is unable to attend, it is the member's responsibility to send a representative so that the program area is represented.
- Reporting to the Data Governance Committee regarding data issues, new data regulations, and new policies affecting data.
- Communicating with their program area teams regarding activities and decisions of the committee.
- Supporting and advocating for data management and governance practices to agency staff.

1.5   Goals and Objectives

- Achieve consistency in collecting and reporting data across various Agency teams and source systems
- Achieve high quality data in our collection, analysis, and reporting
- Ensure that policies and processes for adequate security and protection of data are in place
- Ensure transparency in our data processes

- Respond in a timely manner to data issues that are escalated to the Data Governance Committee.

1.6   Voting Process

Chief Officers and Data Owners each have one vote on the Data Governance Committee. The teams with Data Owners are:
- Data and Technology
  - o   Data
  - o   Information and Technology
- Assessment
- Accreditation and Educator Preparation
- Educator Licensure
- American Indian Education for All
- American Indian Student Achievement
- School Improvement and Every Student Succeeds Act (ESSA
- Title I and Federal Grants
- Health Enhancement and Safety
  - o   School Nutrition
  - o   School Health
- Student Support Services
- Special Education
- Career, Technical, & Adult Education
- Teaching and Learning
- School Finance
- Centralized Services

In addition, the Data Governance Committee will include leads who have specific data responsibilities. These leads are also voting members who will have one vote each:
- Ed Facts Coordinator
- Common Core of Data (CCD) Coordinator
- Student Information Systems Manager
- Statewide Longitudinal Data System (SLDS) Project Manager
- Data Governance Manager

Should any voting member request additional information regarding an issue that is being voted on, that additional information will be provided before the vote is finalized.

1.7   Proxy

Should any voting member of the Data Governance Committee not be able to attend and/or participate in a vote, that member can appoint a proxy to vote in their place as long as the committee facilitator has been notified of the proxy designation before the vote takes place. Each voting member may designate a standing proxy by notifying the facilitator by email.

2.0 CORE DATA STEWARDS COMMITTEE

The Core Data Stewards Committee is made up of staff throughout the agency who have been designated by a Data Owner as a Data Steward to carry out day-to-day responsibilities, actions, and management regarding the data within their area of responsibility. The Core Data Stewards Committee is a collaboration of OPI Data Stewards and is managed and coordinated by the OPI Data Governance Facilitator. To the best of their ability, Core Data Stewards will support and carry forward the mission, goals and objectives of this committee to each of their areas of responsibility and be a leader and guide to other data technicians within those respective areas.

2.1 Mission

The mission of the Core Data Stewards Committee is to support data stewards and represent their program area within the OPI by:

- Acting as a source of knowledge and advocacy for data initiatives.
- Ensuring data projects maintain focus and meet deadlines.
- Escalating issues, as necessary, to the appropriate entity.
- Ensuring data quality and data timeliness through collaboration with the committee, ad hoc workgroups and others throughout the OPI.
- Fostering an environment of learning and sharing expertise in relation to data stewardship, as well as sharing tools and resources.
- Developing and documenting data quality checks and procedures to ensure completeness and accuracy of their program data.
- Performing data quality checks, signing off and obtaining certification from the data owner prior to submitting for federal reporting and release to GEMS.
- Analyzing data governance issues and developing recommendations based on subject matter expertise to the Data Governance Committee for approval.

2.2 Scope and Responsibility

Data Stewardship is an organizational commitment to ensure that data in education records, including personally identifiable information:

- Are accurate, complete, timely, and relevant for the intended purposes.
- Are collected, maintained, used and disseminated in a way that respects privacy and ensures confidentiality and security.
- Meet the goals of promoting access to the data for evaluating and monitoring educational progress and programs.
- Meet the goals of assuring accuracy to ensure that decisions relating to an individual student's rights and educational opportunities are based on the best possible information.

2.3   Goals and Objectives

- Facilitate a connection between the data stewards in the agency, help them to build capacity, and discuss current issues
- Assist in identifying and providing the knowledge, tools, forums, and processes to become effective and efficient in this role
- Improve accountability for data accuracy
- Improve productivity by reducing duplication of effort
- Improve reusability of data
- Improve understanding of data
- Improve reporting capability and timeliness of reporting
- Improve data quality and reducing the cost of work efforts in relation to data clean-up and analysis
- Develop and document data quality processes and procedures
- Understand and communicate with necessary staff any federal or state legislation that will impact OPI data

2.4   Voting Process

The Core Data Stewards Committee is not a formal committee or board, and as such has no formal voting procedures. The Core Data Stewards Committee will develop a recommendation to the Data Governance Committee for their vote and approval that will be documented on the Data Governance Form and in the meeting minutes.

2.5   Ad-hoc Subgroups

The Core Data Steward Committee has the option to create ad-hoc committees based on specific issues being addressed. Assignments to these ad-hoc subgroups should be made to address specific issues. The subgroup should bring results back to the Core Data Stewards Committee and the committee will make a formal recommendation to Data Governance. Subject matter experts from any of the participating organizations may be included in subgroups as needed.

3.0   DATA REQUEST REVIEW COMMITTEE

The mission of the Data Request Review Committee is to implement processes for the provision of accurate, timely data and information to our internal and external customers while protecting personally identifiable student information and other confidential information.

3.1   Scope and Responsibility

The Data Request Review Committee was established to support the flow of data and information requests for all data that has been collected or calculated by the OPI. Data Request Review Committee member responsibilities include:

- Establishing, encouraging and enforcing policies and procedures for responding to data and information requests.
- Providing and continually improving standard procedures for entering, prioritizing, and responding to data requests.

3.2   Member Expectations

- Provide training for OPI staff to initiate and manage data requests
- Prioritize requests as needed
- Assign requests as needed
- Review and determine the legality of responding to the request as needed
- Report and escalate issues to the Data Governance Committee as needed
- Ensure all masking and cell suppression rules are appropriately applied to the data set
- Ensure data set is the highest quality possible and is reviewed by the data steward and/or owner, as necessary
- Obtain a sign-off by the data owner when data is sensitive in nature
- Document the flow and completion of requests
- Make recommendations to Data Governance or Core Data Stewards committees for new reports or dashboards based on data request received, volume and frequency

3.3   The Data Request Process

External data requests should be initiated using the GEMS Data Request Form. It is strongly suggested that internal data requests utilize this process as well, however, if your program area has an assigned data analyst with whom you work on a regular basis, it is acceptable to continue your current process.

The main point of contact for receiving data requests via the GEMS Help desk is the SLDS Stakeholder Liaison and/or the GEMS Data Control Specialist.

The GEMS Data Control Specialist will record and track each data request and make a decision whether or not the data can be located in GEMS, and if so, will walk the user through accessing the data and exporting it based on their needs. The Data Request Review Committee will review other data requests, prioritize, assign or escalate as determined the committee.

The Data Request Review Committee will also recommend new reports in GEMS based on commonly requested data.

The Stakeholder Liaison will follow the request and document the steps that went into fulfillment. In many cases, data owners and data stewards will be involved with requests relevant to their data of responsibility. It is imperative to have a second set of eyes look at each data set being sent out to ensure accuracy and that all masking and cell suppression rules have been applied.

If a Research request is received including personally identifiable information, the Data Privacy and Security Committee will review the request. The resulting signed FERPA agreements for these approved requests will be stored and collected by the OPI Privacy and Security Officer.

4.0   DATA PRIVACY AND SECURITY COMMITTEE

4.1   Mission

The Data Privacy and Security Committee will consider data requests and research proposals both within and outside the OPI. The Data Privacy and Security Committee will consider data requests for accessing data and research proposals. The Committee will consider issues related to requests for access to confidential data.

4.2   Scope and Responsibility

The Data Privacy and Security Committee will review and approve or deny information requests from OPI staff, agents of the OPI, and researchers. The Committee will approve or deny Research requests for personally identifiable information and resolve or escalate controversial issues escalated to this committee from the Data Governance Committee.

4.3   Goals and Objectives

The goals and objectives of the Data Privacy and Security Committee are listed below:

- Review and research proposals or data requests involving personally identifiable information
- Keep record of the approval/denial of research proposals and data requests and any deviations from the original request
- Keep record of FERPA and other signed OPI confidentiality agreements

4.4   Voting Process

The Data Privacy and Security Committee has no formal voting procedures.   The discussion will be documented, approval/denials will be documented, and the OPI Security Officer will follow up with the requestor and/or the data steward for the data being requested.

5.0   DATA USE COMMITTEE

Data use is complex work. A culture of data use is established through leadership, standard setting, and time devoted to data use. The Data Use Committee will develop data use and data visualization standards, particularly for GEMS, with an emphasis on accessibility, privacy and security, and timeliness of releasing data in a way that is understandable to a wide variety of audiences.

5.1   Mission

Collaborating with others to collect, analyze, and disseminate data can provide additional perspectives, lessen redundancies, allow for shared workload, and create a systematic approach to continuous improvement. This committee creates an avenue for our internal and external stakeholders to request data, recommend modifications to existing reports, or to request new GEMS reports or dashboards.   This committee will examine report and data requests, determine what the data mean, the proper data visualization , and the data story , in collaboration with the data owners and stewards. Data analysts and coaches can utilize this committee as a sounding board about trends they are seeing in education data or other linked data and how best to visualize or present the data's narrative.

5.2   Scope and Responsibility

The Data Use Committee is responsible for setting data use and data visualization standards for the OPI and will engage with and provide guidance to internal and external stakeholders and data users about how best to analyze, interpret, present and otherwise use data to inform decisions and provide a transparent look into the data we collect and the trends taking place. This committee will perform preliminary analysis of recently finalized data to be proactive about new data and trends becoming available. This approach will provide for timely reporting to leadership about the narrative of these data and prepare us for releasing these data and narratives in GEMS and/or other data releases.

The Data Use Committee is also responsible for accepting new requests for reports and dashboards in GEMS, prioritizing them and working through design and development with data owners and stewards.

Additionally, it is encouraged to have surveys and other one-time data collections be vetted through this committee to ensure that redundant data is not collected, and that survey tools and instruments are used as efficiently as possible.

5.3 Goals and Objectives

The goals and objectives of the Data Use Committee are listed below:

- Empower users to be engaged with and understand their data
- Empower users to incorporate data into their decision-making processes
- Provide guidance on best practices for data use and data visualization
- Provide guidance to ensure GEMS, GIS mappings, and any other reports or dashboards produced by the OPI follow all OPI accessibility, masking and cell suppression rules
- Provide preliminary analysis of newly finalized data to provide timely reporting to leadership about data trends
- Determine Data Use Priorities that will inform the agency about program effectiveness and other areas of interest to leadership

6.0   DATA GOVERNANCE AND CORE DATA STEWARDS COMMITTEE MEMBERS

[Data Committee Roster](#)