

# **CNMI PSS Executive Data Governance Policy**

Prepared by: CNMI PSS Data Governance Committee

Established: June 25, 2018

Version 1

Approved by the CNMI State Board of Education on October 3, 2018

## EXECUTIVE SUMMARY

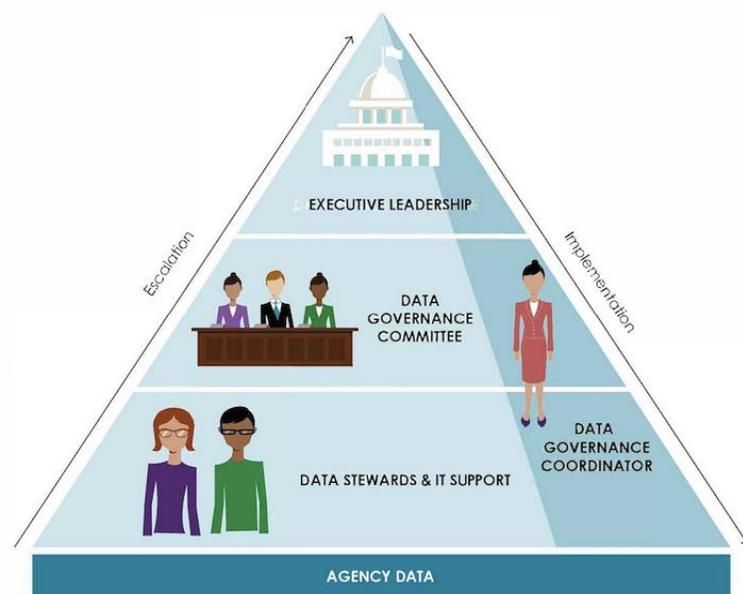
Data governance **supports decision-making in data-related matters, such as the availability, usability, integrity, and security of data.**

**An effective data governance program includes a defined set of procedures and policies, and a plan for executing those procedures and policies.**

In order for its data governance program to be effective and to accomplish the System's mission, the CNMI Public School System will put the necessary personnel, policies, procedures, and organizational structures in place to make data accurate, consistent, and secure. Effective data governance can make the agency more efficient by reducing costs, establishing accountability and ensuring transparency, and building standard, repeatable processes regarding data activities and communication. To do so, however, the data governance program requires active and ongoing participation and commitment of executive leadership, and Information Technology, as well as consultation with external education stakeholders. The focus of the CNMI PSS Data Governance policy is to:

- Promote Data Quality;
- Promote effective use of data to inform and improve education in the CNMI;
- Eliminate Redundancy in Data Collection;
- Establish data security;
- Protect confidentiality and Privacy, and;
- Define the Protocols and Procedures for the CNMI PSS to Ensure that Governance is Enforced

## GOVERNANCE ROLES AND RESPONSIBILITIES



## Overview of the CNMI PSS P-12 Data Governance Structure

### Executive Leadership

**Who:** CNMI PSS Commissioner of Education, Associate Commissioners, Infrastructure Technology Program Director, Head Start and Early Head Start Director, Data Governance Coordinator. The Data Governance Executive Leadership is **responsible for the oversight of the overall data framework, governance, and management.** To ensure data governance is implemented and provide program and policy direction (priorities), the following will be in place:

- Dedicate adequate resources to data governance
- Create and appoint members to the Data Governance Committee
- Resolve issues escalated by the Data Governance Committee
- Approve data policies and major data-related decisions proposed by the Data Governance Committee
- Hold program areas or participating agencies accountable for adhering to the Data Governance Policy.
- Serve as the Data Governance Policy Committee on a regular basis
  - Resolve issues escalated by the Data Governance Committee
  - Approve data policies/decisions proposed by the Data Governance Committee

### Data Governance Committee

**Who:** The Data Governance Committee will consist of representatives from Accountability, Research and Evaluation, Administrative Services, and Student and Support Services. The role of the Data Governance Committee is to:

- Identify, prioritize, and resolve critical data issues affecting the quality, availability, or use of data
- Establish, document, and enforce agency-wide or inter-agency data standards, policies, and processes (e.g., data request policy and process)

*(Current Data Governance Committee: Lynette Villagomez, Annette Pladevega, Ruth Calvo, Probio Cabrera, Fasefulu Tigilau, Jesse Tenorio, Nora Pangelinan, Bobby Cruz, Lanessa Lizama)*

### Data Stewards

**Who:** Data Stewards are Program area staff and School-Level Registrars or Designee.  
Data stewards:

- Ensure records and data quality, and the appropriate use among program area staff.
- Are knowledgeable about the policies governing the programs.
- Are knowledgeable about the records and data required and needed to support the program area.
- Ensure the data needs of their program area are met.
- Are responsible for the maintenance of a given domain of records and data throughout the information lifecycle, from collection through to use.
- Determine how data are defined, collected, quality assured, and reported
  - Inform calculation of metrics and determination of the source system of record for external reporting
  - Ensure metadata is documented and kept current
- Identify and serve on working groups to resolve critical data issues
- Propose process and procedural improvements to improve data quality and/or agency efficiency
- Communicate data governance policies, processes, and decisions within school/office.
- Participate in data governance meetings.
- Serve as point of contact for their school and/or program area.
- Each school and department program should have at least one steward

### **Infrastructure Technology (IT) Support**

**Who:** Infrastructure Technology Network Specialists. The IT Support:

- Provides technical assistance to Data Stewards and the Data Governance Coordinator.
- Manages and troubleshoots network connectivity to Data Warehouse.

### **Data Governance Coordinator**

**Who:** The Data Governance Coordinator is responsible for leading the overall direction and implementation of the data governance program. The Data Governance Coordinator:

- Manages the establishment, documentation, monitoring, improvement, and training on the data governance program, policies, and processes
- Liaison among data governance groups and members to ensure that data are defined, stored, linked, protected, reported, and used in a manner consistent with the needs of the state or agency and in compliance with the data governance policy
- Identifies program, process, and technological improvements that will improve data quality and data use and eliminate redundancies of effort
- Oversee the escalation and resolution of issues among the data governance groups
- Chairs the Data Governance Committee

- Convenes working groups of data stewards to address critical data issues that span multiple program areas or agencies
- The Data Governance Coordinator has a state- or agency-wide perspective on data quality and use
- Understands how data use should support and inform the state's or agency's policies and programs
- Ability to balance agency- or state-wide goals and strategy with making and implementing specific decisions in alignment with the broader goals/strategy
- Ideally not located in IT or in a specific program area

## **POLICIES AND PROCESSES**

\*Data policies and procedures will be managed in accordance with all applicable federal and local privacy laws including, but not limited to: the Family Educational Rights and Privacy Act (FERPA) of 1984 (20 U.S.C. Sec. 1232g; 34 CFR Part 99); The National School Lunch Act (42 U.S.C. 1758; 7 CFR Section 245.6); and 1 CMC § 2378 the Division of Youth Services (DYS) Access to Student Records.

**Standard Policies and Procedures.** Data collection, maintenance and dissemination to ensure privacy and confidentiality that preserves privacy and security. Monitoring compliance with established policies (e.g., Data Release/Use and Reporting and Data Sustainability). Documenting and communicating with stakeholders.

**Data Inventories.** Inventory, all data equipment such as computer equipment, software and files. Inventory of all data elements that should be classified as sensitive, Personal Identifiable Information (PII), or both, and documentation and maintenance of metadata (e.g. data dictionary).

**Data Content Management.** Ensure the collection of sensitive data is justifiable, optimize data management processes, and ensure compliance with federal, state, and BOE regulations.

**Data Records Management.** Specifying appropriate managerial and user activities related to handling data is necessary to provide data stewards and users with appropriate tools for complying with an organization's security policies. Establish and communicate policies and procedures for handling records throughout all stages of the data lifecycle, including acquiring, maintaining, using, and archiving or destroying data.

**Data Quality.** Ensuring that data are accurate, relevant, timely, and complete for the purposes they are intended to be used is a high priority issue for any organization.

**Data Access.** Defining and assigning differentiated levels of data access to individuals based on their roles and responsibilities in the organization is critical to preventing unauthorized access and minimizing the risk of data breaches.

**Data Security and Risk Management.** Ensuring the security of sensitive and personally identifiable data and mitigating the risks of unauthorized disclosure of these data is a top priority for an effective data governance plan.

**Definitions: Specific terms used within this document**

<b>Term</b>	<b>Definition</b>
<i>Database</i>	A structure and mechanism for the storage, description and management of data elements and information.
<i>Data Collection</i>	Required collection of data from the schools to the CNMI PSS and/or from CNMI PSS to state and/or federal authorities.
<i>Data Element</i>	Distinct type of data field, e.g. “age,” “ethnicity,” “test score.”
<i>Data Governance</i>	A combination of policies, organizational roles and responsibilities, and job descriptions that collectively describe how decisions are made, monitored and enforced regarding the management of an organization’s data.
<i>Data Governance Structure</i>	A logical structure for organizing how we think about and communicate Data Governance concepts.
<i>Data Privacy</i>	The assurance that a person’s or organization’s personal and private information is not inappropriately disclosed. Ensuring Data Privacy requires Access Management, eSecurity, and other data protection efforts.
<i>Data Request</i>	Data requests from internal or external agencies for a specific reason such as a report, analysis, comparison, evaluation, research, etc.
<i>FERPA</i>	Family Educational Rights and Privacy Act (or FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99), is a Federal law that protects the privacy of student education records. The law applies to all schools that receive funds under an applicable program of the U.S. Department of Education.
<i>Server</i>	A server is a computer that provides data to other computers. It may serve data to systems on a local area network (LAN) or a wide area network (WAN) over the Internet.

	<p>Many types of servers exist, including web servers, mail servers, and file servers. Each type runs software specific to the purpose of the server. For example, a Web server may run Apache HTTP Server or Microsoft IIS, which both provide access to websites over the Internet. A mail server may run a program like Exim or iMail, which provides SMTP services for sending and receiving email. A file server might use Samba or the operating system's built-in file sharing services to share files over a network.</p>
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Lynette L. Villagomez

**Associate Commissioner of Accountability, Research and Evaluation**

Glenn P. Muna

**Interim Commissioner of Education**