Office of Public Instruction Policy

Policy: OPI 1.1.06	Subject: **Data Governance Policy**
Chapter1: ADMINISTRATION AND MANAGEMENT	Page 1 of 4
Owner: MEASUREMENT AND ACCOUNTABILITY DATA COLLECTIONS BUREAU CHIEF	Effective Date: November 1, 2018
Last Reviewed:	Revised:

I. POLICY

It is the policy of the Montana Office of Public Instruction (OPI) to maintain a data governance system that enforces consistency and quality standards in the business processes pertaining to data collection, maintenance, use of data, and regulatory compliance.

II. APPLICABILITY

This policy applies to all the OPI departments, divisions, programs.

III. DEFINITIONS

Ad Hoc Committee—A group of subject-matter experts who detail the needs and requirements of a data governance issue. The group provides details and recommendations to the Core Data Stewards Committee and/or the Data Governance Committee.

Business Rules—A set of standard questions that must be answered to determine data resources, such as:

- Which collection is used to report the data?
- Where is the collection stored?
- Which database, table, or spreadsheet is used to report the data?
- Which field(s) in the database, table, or spreadsheet is (are) used to report the data?

Core Data Stewards Committee—A committee to (1) collectively ensure awareness of data collection and reporting requirements for all the OPI, (2) review and recommend all changes to the OPI data collection and reporting to the Data Governance Committee, (3) manage new collections and changes upon approval of the Data Governance Committee, and (4) propose new business rules as necessary.

Data Collection—The process of gathering, reviewing, verifying, correcting, and preparing education data for federal, state, local, and public reporting and for research analysis.

Data Governance Annual Review—An annual analysis of data collections for the OPI Superintendent's office that:

- Confirms the statutory basis for all data elements.
- Identifies any duplicate data elements collected by the OPI.
- Identifies any system consolidations that reduces the reporting burden on schools.
- Includes plans to resolve any of the above items.
- Clarifies responsibility for the Data Governance Committee outside of the committee.

Data Governance Committee—A committee that maintains business processes for data cleansing, resolving data inconsistencies, data requests, data use, security and access, and data integration.

Data Governance Committee Charter—A document that outlines the data governance committee's membership, identifies the members, and provides a description of the committee's objectives, authority, roles, and responsibilities.

Data Governance Facilitator—An OPI employee assigned to collect and manage data governance issues, develop data governance and core data stewards meeting agendas, schedule meetings, document the meetings' outcomes, and enter decisions into the OPI Data Governance Issues Log.

Data Governance Issue Request—The form that is filled out to initiate a data governance item.

Personally Identifiable Information(PII)—Education records that pertain to an individual student and may easily lead to that student's identity with reasonable certainty. The Family Educational Rights and Privacy Act, or FERPA) regulations list personally identifiable student information as including, but not limited to:

- The student's name.
- The name of the student's parent or other family member.
- The address of the student or student's family.
- A personal identifier, such as the student's social security number or student identification number.
- A list of personal characteristics that would make the student's identity easily traceable.
- Other information that would make the student's identity easily traceable.

Student Level Data—Any information that educators, schools, districts, and state agencies collect that refers to individual students.

IV. OFFICE OF PUBLIC INSTRUCTION PROCEDURES

A. General Requirements

1. Refer to the Data Governance Charter for the Data Governance Committee composition.
2. The Data Governance Committee's general duties and tasks include review and/or approval of:
   a. New data collections including the collection of new data elements.
   b. Changes or deletions to existing data collections or data elements.
   c. Data collection timelines and calendars.
   d. The creation of or changes to existing business rules used in computer programming scripts impacting data files or data systems.
   e. Data quality procedures.
   f. Resolution of data discrepancies.
   g. Data snapshots used for reporting.
   h. Changes to previously finalized or historical data.
   i. Other controversial issues pertaining to data.
3. The Data Governance Committee process is used to disseminate information regarding data-related topics, such as:
   a. Updates from project teams working on initiatives related to data reporting and collections.
   b. New Information Technology (IT) projects.
   c. Updates concerning existing IT projects.
4. The Data Governance Committee represents the perspectives of all agency users of education data. The collective expertise of the committee provides guidance on data governance policies, practical advice on development and testing of new procedures and best practices for proper management and use of data. Attendance of members is critical to the success of data governance procedures.

B. Implementation

1. A stakeholder or steward identifies a need or issue by filling out a Data Governance Form and sending the form to the Data Governance Facilitator, who inputs it into the Data Governance Issues log.
2. The Data Governance Facilitator summarizes the issue, gathers information, and discusses the issue with the Chair of the Data Governance Committee.
3. If the Chair and Data Governance Facilitator determine that the request is controversial or requires a substantial systemic change, it is presented to the Data Governance Committee for review.
4. If the request is not approved in concept by the Data Governance Committee, the committee documents the resolution of the issue and denies the Data Governance Form.

5. If the Data Governance Committee approves the concept or the data need is not controversial and does not require a substantial systemic change, it is presented to the Core Data Stewards to address the issue or suggest the issue be addressed by an identified ad hoc team.

6. The ad hoc team completes the Data Governance Form with recommendations and/or resolutions to the issue.

7. The completed Data Governance Form is returned to the Data Governance Facilitator to present to the Core Data Stewards.

8. If the Core Data Stewards make changes, the form reverts to the ad hoc team for revision. Once the changes are implemented, the form is returned to the Data Governance Facilitator and Core Data Stewards for approval. This process is repeated until the Core Data Stewards approve the form.

9. When the Data Governance Form is approved by the Core Data Stewards, the Data Governance Facilitator presents it to the Data Governance Committee for final approval. If the form is denied or requires more information, it is returned to the Core Data Stewards for notification of final decision. The Data Governance Facilitator will ensure that basis for approval or denial are documented, capturing any dissents in the approval process.

10. If approved, the completed form and plan go to the appropriate analyst or programmer to develop or make the data change and provide documentation to IT, if necessary. The approved form is returned to the Core Data Stewards for notification of final decision.

V. CLOSING

Questions concerning this policy should be directed to the OPI Measurement and Accountability Data Collections Bureau Chief or the Data Governance Facilitator.

VI. REFERENCES

Data Governance Committee Charter
Data Governance Issue Request Form

VII. ATTACHMENTS

None