CNMI PSS Executive Data Governance Policy

Purpose, Mission and Scope

Purpose: To establish a comprehensive data governance and management framework for the Commonwealth of the Northern Mariana Islands Public School System (CNMI PSS).

Mission: Data Governance will lead in the creation, implementation, and oversight of information to support decision-making in data-related matters, such as the availability, usability, integrity, and security of data.

Scope: This policy encompasses all data collected, maintained, and used by CNMI PSS, including the Statewide Longitudinal Data System (SLDS). The project aims to ensure that all staff and divisions within CNMI PSS actively participate in data collection, management, and governance processes, eliminating any assumptions that survey data are not governed by data governance policies.

This policy also focuses on data governance and management within CNMI PSS and does not involve the development of new data collection systems but aims to enhance the governance and management of existing data systems, including the SLDS. In addition, the policy does not modify existing data privacy laws or regulations but ensures compliance with the relevant legislation.
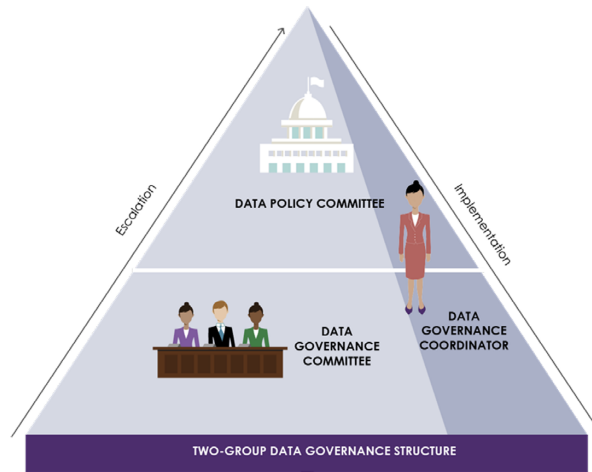
Overview of Data Governance

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 the Executive Leadership, the Data Governance Committee, Data Stewards, Information Technology, and with additional external educational stakeholders as expansion occurs. The Data Governance Coordinator will work as a liaison between these groups to support data governance.

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 structures, roles, policies, and protocols and procedures for CNMI Public School System to ensure that the Data Governance program is effective, enforced, and sustained.

Governance Roles and Responsibilities

Overview of the CNMI PSS P-12 Data Governance Structure

Executive Leadership

Who: SLDS Stakeholders in executive leadership positions, <u>including the Commissioners, of Education, Associate Commissioners, and Heads of Departments of participating agencies,</u> and the 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 to provide program and policy direction (priorities), Executive Leadership has the following responsibilities:

- Dedicate adequate resources to data governance
- Create and appoint members to 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 consists of representatives from the departments of the CNMI Public School System, managers of data systems, and other partnering agencies when applicable. 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)

Data Stewards

Who: Data Stewards are program area staff and school-level Registrars or Designee. Data stewards are knowledgeable about the policies governing their programs and the data required to support the program area:

- Ensure records and data quality, and the appropriate use among program area staff.
- 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 as needed
- 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 the 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 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, and has the ability to balance agency- or state-wide goals and strategy with making and implementing specific decisions in alignment with the broader goals/strategy.

The Data Governance Coordinator:
- Manages the establishment, documentation, monitoring, improvement, and training on the data governance program, policies, and processes
- Serves as the 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

Policies and Procedures

*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 data privacy and confidentiality while preserving security. Monitoring compliance with established policies (e.g., Data Release/Use/Misuse, 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 data 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 data 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 is 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.

<u>Definitions</u>: Specific terms used within this document

Term	Definition
Data Collection	Required collection of data by the schools for CNMI PSS and/or from CNMI PSS to state and/or federal authorities
Data Element	Distinct type of data field, e.g. "age," "ethnicity," "test score."
Data Governance	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.
Data Management	The practice of organizing data as a resource to find its potential for an organization.
Data Privacy	The assurance that a person's or organization's personal and private information is not inappropriately disclosed. Ensuring data privacy

	requires access management, security, and other data protection efforts.
FERPA	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.
Governance Structure	A logical framework that assigns power and the governing or management roles in an organization.
Metadata	a set of data that describes and gives information about other data
Personally Identifiable Information (PII)PII	Data element, or combination of data elements, that allows the identification of an individual