CNMI PUBLIC SCHOOL SYSTEM

DATA GOVERNANCE MANUAL

Prepared by:

CNMI
STATEWIDE LONGITUDINAL DATA SYSTEM
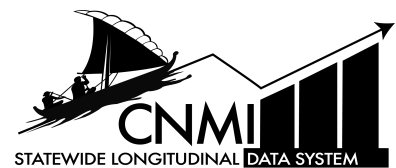
May 2025

1.0   INTRODUCTION

1.1 Purpose

This Data Governance Manual is a reference guide designed to provide a comprehensive guide that documents the implementation of the CNMI Public School System (CNMI PSS) Data Governance Program (DGP) or *P12 Data Governance Program*. While the CNMI Statewide Longitudinal Data System (SLDS) is one important component, the PSS DGP extends beyond SLDS and applies to all educational data managed by the CNMI PSS. It establishes a clear framework for roles, responsibilities, policies and processes necessary to ensure the consistent, secure, and purposeful management of educational data. The PSS DGP ensures that all data is managed as a valuable asset, promoting the availability, usability, integrity and security of educational data across the CNMI PSS.

This manual aligns and expands the CNMI PSS Executive Data Governance Policy and is intended to serve as a reference for all stakeholders involved in the collections, use and governance of data across the CNMI PSS. As a living document, this manual is designed to evolve and adapt through ongoing updates and revisions as needed.

1.2   Scope

The CNMI SLDS centralizes data from over 10 sources within the CNMI PSS, currently linking early childhood through high school graduation data. The CNMI PSS DGP encompasses most data managed by the CNMI PSS including student, staff, program and financial information. The program seeks to promote active participation from all staff and divisions within the CNMI PSS in data collection, management, and governance, while reinforcing that survey data are also subject to established data governance policies. The PSS DGP applies to data and systems that are both within and outside of the SLDS.

1.3   Value

The CNMI PSS DGP enhances the value of the CNMI PSS educational data by ensuring it is accurate, accessible, secure, and usable across the system. It builds trust in data through transparent, standardized processes and fosters collaboration among stakeholders. Through clear roles, policies, and procedures, the program empowers informed decision-making, supports strategic initiatives, and ensures compliance with privacy and security mandates.

Its benefits are not confined to a single program but span the entire agency, improving how data is used and governed in every department and school. By reducing redundancies, improving data quality, and streamlining access, the program minimizes staff burden and increases the effectiveness of data use at every level—from school administrators and educators to policymakers. Ultimately, it strengthens accountability and enables data-driven improvements that benefit students, schools, and the wider community.

1.4 Data Users and Use Priorities

The CNMI PSS DGP serves a wide array of internal and external stakeholders, including CNMI PSS Key Management, school administrators, program managers, data stewards, educators, policymakers, and community partners. Each user group relies on timely, high-quality data to guide decisions that affect teaching, learning, and student support.

The CNMI PSS DGP applies to data collected, managed, and used across all CNMI PSS divisions and initiatives, not only those tied to the SLDS. The PSS DGP prioritizes the use of data to support strategic decision-making, policy development, and program improvement in alignment with educational goals and equity commitments.

The CNMI PSS Research Agenda currently consists of the following priorities:
- **Understanding the Impact of Professional Development on Instructional Practices**: Examining how teacher learning opportunities influence classroom practice and student outcomes.
- **Evaluation of College and Career Pathway Programs:** Analyzing program participation and post-secondary outcomes to ensure alignment with workforce needs and student aspirations.
- **Integration and Impact of Technology on Learning:** Assessing how digital tools and infrastructure support student engagement, access, and achievement.
- **Implementation and Effectiveness of Multi-Tiered Systems of Support (MTSS):** Monitoring the fidelity and outcomes of interventions designed to support all learners.
- **Evaluation of Data Systems and Governance:** Reviewing system performance and adherence to governance protocols to improve data integrity and utility.
- **Impact of Personnel Recruitment and Retention Strategies:** Measuring the effectiveness of efforts to attract and retain highly qualified educators and staff.
- **Assessment of Safety and Wellbeing Initiatives:** Evaluating programs and practices designed to support physical, social, and emotional safety in schools.
- **Engagement Strategies with Families and Communities:** Understanding the reach and impact of efforts to strengthen partnerships that support student success.
- **Assessment of the Effectiveness of the Summer School Program:** Gauging how supplemental instructional time influences learning recovery and academic growth.

By aligning data collection and analysis with these high-priority areas, CNMI PSS ensures that the CNMI PSS DGP supports a comprehensive, equitable, and results-driven education system.

2.0   CNMI PSS DGP STRUCTURE

The CNMI PSS DGP provides the organizational structure through which education leaders and program representatives collaboratively develop and implement policies, procedures, and standards that govern the use of data across the CNMI Public School System. This structure ensures a coordinated approach to managing data assets in support of strategic decision-making, system accountability, and the continuous improvement of educational outcomes for students in the CNMI.

2.1   CNMI PSS DGP: Key Groups and Roles

The CNMI PSS DGP is supported by a two-tiered governance structure designed to ensure accountability, cross-functional coordination, and effective oversight. This structure includes the *P12 Data Governance Executive Leadership* and the *P12 Data Governance Committee.*

Together, these two groups form the backbone of the CNMI PSS data governance framework. Their collaborative efforts ensure that the CNMI PSS DGP:
- Promotes data quality and integrity across all levels of the education system
- Promotes the effective use of data to inform instructional practices and improve student outcomes
- Eliminates redundancy in data collection by streamlining processes and promoting interoperability
- Establishes robust data security measures to safeguard sensitive information
- Protects the confidentiality and privacy of all data maintained by CNMI PSS in compliance with federal and local regulations

2.1.1   Relationships Among Groups

The CNMI PSS DGP is built upon a collaborative framework of leadership, technical expertise, and operational oversight. The following groups and individuals form the foundation of the program's structure, each playing a critical role in supporting data quality, privacy, accessibility, and use across the program.

The two-tiered structure also establishes a clear pathway for communication and decision-making: escalation of issues, questions, and recommendations moves upward through the model, while decisions and the implementation of PSS DGP initiatives flow downward across the tiers. This ensures responsive leadership, clarity of responsibility, and shared ownership of data governance practices throughout the organization.

2.1.2 Member Induction

New members of the CNMI PSS DGP are welcomed and onboarded through a structured orientation process designed to build a foundational understanding of data governance principles and ensure alignment with the goals and expectations of the CNMI PSS DGP. This onboarding process is led by the Data Governance Manager (DGM) and the SLDS Project Director.

2.2 Data Governance Coordinator (Manager)

The Data Governance Coordinator, which is synonymous with the Data Governance Manager, is responsible for leading the overall direction and implementation of the CNMI PSS DGP.

2.2.1 Roles and Responsibilities

- 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,
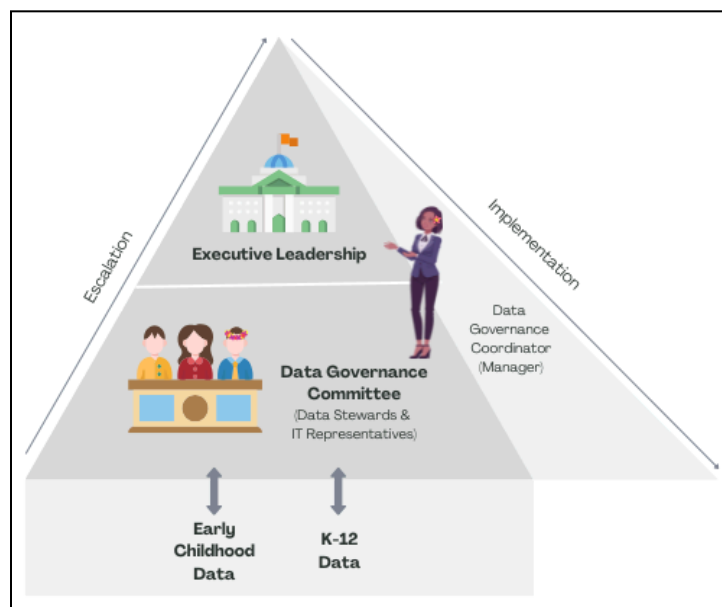
stored, linked, protected, reported, and used in a manner consistent with the needs of the state or agency and in compliance with the data governance policy
- Identifies program, process, and technological improvements that will improve data quality and data use and eliminate redundancies of effort
- 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
- 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

2.3   P12 Executive Leadership

2.3.1   Purpose

Executive Leadership is responsible for the oversight of the overall data framework, governance and management. They provide program and policy direction to ensure that governance is implemented.

2.3.2   Membership

- Commissioner of Education
- Associate Commissioner(s)
- Department heads of data stewards and & IT representatives
- Data Governance Coordinator (Manager).

2.3.3   Roles and Responsibilities

Specific duties include:
- Dedicating sufficient resources to support the PSS DGP
- Appointing members to the P12 Data Governance Committee
- Holding departments accountable for compliance with the CNMI PSS Executive Data Governance Policy
- Serving as the *Data Governance Policy Committee*, with responsibilities to:
    - Resolve issues escalated by the P12 Data Governance Committee
    - Review and approve policies and decisions proposed by the P12 Data Governance Committee

2.3.4   Decision Making Authority

P12 Executive Leadership, under the leadership of the Commissioner of Education, holds the highest level of decision-making authority. As the top body of the CNMI PSS DGP structure, P12 Executive Leadership is responsible for endorsing and authorizing key policies, initiatives, and resolutions that impact data quality, security, and use across the CNMI PSS.

2.3.5 Member Expectations

This is the content of the commitment letter signed by all members of the Executive Leadership

As a member of Data Governance Executive Leadership, understand that I have an ethical responsibility to support the oversight of the data framework, governance, and management in relation to the CNMI Public School System. I believe in the purpose and mission of data governance and will support the lead of the data governance committee.

Responsibilities of Executive Leadership
1. *Involvement*
   a. *Ensure data governance is implemented*
   b. *Support programs and policy priorities*
2. *Oversight*
   a. *Appoint members to the Data Governance Committee*
   b. *Approve or support data policies and major data-related decisions proposed by the Data Governance Committee*
   c. *Hold program areas or participating agencies accountable for adhering to data governance policies*
   d. *Encourage Data Governance Committee members to attend required meetings and workshops*
   e. *Allow time for Data Governance Committee members to complete tasks related to data governance*

By signing below, I understand that if 1do not fulfill the above roles and responsibilities, I will expect the Commissioner of Education or Data Governance Coordinator to contact me and further discuss my responsibilities.

2.3.6 Meeting Cadence

Meetings are held on an as-needed basis, usually called by the Data Governance Manager. Briefings and updates of the Data Governance Committee are provided to the Executive Leadership by the Sr. Director of ARE during the Key Management meetings.

2.4 Data Governance Committee (DGC)

2.4.1 Purpose

The Data Governance Committee serves as a guiding body within the CNMI PSS to promote the responsible management and use of its data. Its purpose is to support the agency's mission by ensuring that data is accurate, accessible, and effectively utilized across all departments and systems.

2.4.2 Membership

- Data stewards of offices that contribute data to the SLDS warehouse
- Report stakeholders from the Office of Accountability, Research and Evaluation (ARE)
- Report stakeholders from the Office of Curriculum and Instruction (OCI)
- IT Representatives from the Office of State Infrastructure Technology (SIT) & SLDS Program

When a new or replacement member is needed on the DGC, the Data Governance Manager will initiate the appointment process by submitting a formal memo to the Executive Leader overseeing the relevant data program, requesting the designation of a qualified representative.

Once the appointment is confirmed, the new or replacement DGC member is required to complete a structured onboarding process prior to participating in any official DGC work session.

2.4.3 Roles and Responsibilities

This cross-functional group ensures operational coordination and policy implementation across program areas. Its primary functions include:
- Identifying, prioritizing, and resolving system-wide data issues that impact quality, access, or usability
- Developing, documenting, and enforcing standards and procedures, including agency-wide and inter-agency data policies (e.g., data access, request, and sharing protocols)

2.4.4 Decision Making Authority

The P12 Data Governance Committee holds delegated decision-making authority to address and resolve system-wide data issues that directly affect the quality, integrity, and usability of educational data.

- **Critical Data Issues (CDIs):** The Data Governance Committee has the authority to identify, assess, and recommend resolutions for CDIs—data-related challenges that have a demonstrable negative impact on critical CNMI PSS programs or operations. Once a CDI meets established criteria, the committee mobilizes work groups to resolve them through a formalized, 8-step resolution process.

- **Voting Authority:** Data Governance Committee members possess voting authority on key actions, including prioritization of CDIs, approval of policies for escalation to Executive Leadership, procedural recommendations, and adoption of improvements to data collection, management, and reporting practices.

- **Policy and Process Recommendations:** While the Data Governance Committee does not approve policy, it has the authority to develop and propose new policies that enhance data quality, efficiency, and compliance. These proposals are submitted to Executive

Leadership for final approval.

- **Standards and Definitions:** The committee is empowered to define and standardize data terms, metrics, and protocols used throughout CNMI PSS to ensure consistency, transparency, and shared understanding across departments and programs.

2.4.5 Member Expectations

This is the content of the commitment letter signed by all members of the Data Governance Committee

As a member of the Data Governance Committee, I have an ethical responsibility to ensure that the Data Governance Committee does the best work possible in pursuit of the following stated goals.

I believe in the purpose and mission of data governance and will act responsibly and cautiously as a committee member.

Responsibilities of Data Governance Committee Members:

1. Involvement and Active Participation
- *a) Attend 75% or more of the monthly data governance committee meetings*
- *b) Participate in/or lead one or more subcommittees*
- *c) Attend one or more annual conferences/meetings such as the SLDS Best Practices Conference, SLDS Pacific Entities Meeting, or Common Education Data Standards (CEDs)*
- *d) Successfully complete FERPA training every year*
    - *1) FERPA 101 -Local Education Agencies, a*
    - *2) FERPA 201 -Data Sharing Under FERPA*
- *e) Advocate on behalf of your department/office/program*
- *f) Advocate on behalf of the data governance committee publicly*
- *g) Vote in decision making efforts on behalf of your department/office/ program*
- *h) Notify key leadership in your department on any changes or upcoming events related to data governance*

2. Planning Oversight and Operation
- *a) Provide input into strategic plans and monitor progress toward goals*
- *b) Participate in the review of SIDS monthly/annual financial statements and audit reports*
- *c) Ensure CNMl PSS compliance with all data-related policies*
- *d) Stay informed, read minutes, and provide input at monthly meetings*

Data Governance Coordinator's Responsibilities to Committee Members:
- *Communicate major organizational updates regularly*
- *Inform committee members immediately of any critical, urgent, or unexpected issues*

- *Offer opportunities for personal, professional development and public engagement as a committee member*
- *Provide timely notice of all Data Governance Committee meetings and meeting minutes.*

By signing below, I understand that if I don't fulfill the above roles and responsibilities, I will expect the Data Governance Coordinator to contact me and further discuss my responsibilities.

2.4.6   Meeting Cadence

Meetings are held on a monthly basis on the 2nd Wednesday of the month. *(This is subject to change upon majority approval of the Data Governance Committee)*

3.0   DATA GOVERNANCE OPERATIONS

3.1   File Repository

All files related to the CNMI PSS Data Governance Program—including meeting agendas and minutes, decisions, identified issues, resolution plans, policy drafts, and finalized governance materials—are centrally stored on a shared drive accessible to all members of the Data Governance Committee.

Location of Shared Drive:
https://drive.google.com/drive/folders/1z7qyt582y6OCXbkPgEoeZD8AqeNgQGvx?usp=sharing

Access is restricted to authorized personnel involved in the P12 Data Governance Committee.

3.2   Data Governance Manual Development and Maintenance

The Data Governance Manual will be reviewed and updated annually to ensure its continued relevance, accuracy, and alignment with evolving data management practices, policies, and organizational priorities within the CNMI PSS.

The Data Governance Manager is responsible for initiating and coordinating this review process. Revisions may also be made throughout the year as needed in response to significant changes in data systems, regulations, or governance structure.

3.3   Data Governance Voting Procedures

3.3.1   Voting Eligibility
All members of the Data Governance Committee have voting rights except for the Data Governance Manager and advisors (e.g., Executive Leadership and SLDS Project Director), who serve in a non-voting capacity.

Each eligible voting member shall have one vote. Voting members are specified under Section 2.4.2 Membership (Data Governance Committee).

3.3.2   Voting Rules *(as established on February 8, 2023 DGC work session)*

1. A minimum of 51% of active voting members must be present to establish a quorum (and convene a DGC work session).
2. Voting is on a "majority rule" basis or 51% of the votes.
3. Online attendance is allowed for DGC members who are on official travel sanctioned by the CNMI PSS.
4. Online voting is permitted for DGC members who are on official travel sanctioned by the CNMI PSS.
5. Proxy voting is allowed for "within-CNMI" DGC members who are unable to attend and who has identified a proxy for their membership at a particular convening.

4.0 POLICIES AND PROCESSES

4.1   Critical Data Issues (CDI)

The CNMI PSS aims at maintaining high standards of data quality, accessibility and reliability by assessing data-related issues that impact the accuracy, availability, integrity and usability of data. CNMI PSS identifies critical data issues based on these two (2) criteria:
1. Negative impact on one or more critical PSS Program or Operation
2. Caused one or more major errors, problems or costs

These issues are formally documented within the P12 Data Governance Committee shared drive depicting its urgency, scope and potential impact on operational, strategic and compliance outcomes.

4.1.1   CDI Prioritization

The Data Governance Committee prioritizes identified critical data issues based on impact and effort and applies the CDI 8-step Resolution, which guides the creation of policies and processes.

4.1.2   CDI 8-Step Resolution
1. Define the Issue
2. Form CDI Work Group
3. Detail Current State
4. Define Desired Future State
5. Develop Proposed Solution
6. Bring Solution to Full Data Governance Committee
7. Implement Solution
8. Assess Efficacy of Solution and Adjust

4.2   Data Sharing Agreements

P12 Data Sharing Agreements (DSA) were executed between the CNMI SLDS and each respective data system provider to define and govern the conditions, limitations and responsibilities related to the transfer, storage, use, and protection of personally identifiable information (PII) and other confidential data. This enables the secure and lawful exchange of data necessary to build and sustain a longitudinal data system, while complying with the Family Educational Rights and Privacy Act (FERPA) and the CNMI Board of Education regulations.

4.3   Metadata & Data Refresh Management

Metadata refers to the information used to define, describe, and manage data elements across the PSS. System-wide, metadata helps ensure consistency, clarity, and alignment across programs by documenting data definitions, ownership, and data handling procedures. The metadata-related documentation—such as data elements, designated authorities, transfer requirements, vendor agreements, and refresh schedules—are governed by P12 DSA. The SLDS Technical Manager,

in coordination with the SLDS Data Warehouse contractor, oversees metadata collection, maintenance, and usage. Key metadata resources include the CNMI SLDS Data Dictionary, which outlines data elements currently captured from Preschool through Grade 12, with planned expansion into Postsecondary and Workforce domains.

In the SLDS Program, Data Refresh Management is formalized through the P12 DSA, jointly signed by Data Stewards and their supervisors. PSS data from programs such as Achieve 3000, Smarty Ants, Infinite Campus, Child Plus, Assessments, Head Start, and Finance, are uploaded to the SLDS Data Warehouse on either a daily, monthly or annual Data Transfer Refresh Schedule.

Requests for changes to the data warehouse (e.g., adding new data fields or systems) must be reviewed and approved by CNMI PSS and the respective Data Steward. The vendor is then engaged for documentation and training prior to onboarding.

"Data Program" - Designated Authorities and Data Transfer Requirements	
Data Source	
Data Steward	
Vendor Company Name	
Vendor POC Information	
Location of Data (on-prem, cloud)	
Earliest Year	
Last Year	
Target Refresh Rate for Data Source (e.g. daily, weekly, quarterly, etc)	
Data Acuisition Type (API, Portal Download, etc)	
Requirements Gathered	
File download/extract format (.csv)	
Is the system being replaced, if please provide ETA and new system if available	
Updated by PSS SLDS on _____	

4.4   Data Access

The CNMI PSS provides access to data collected from its 20 schools and 11 Early Head Start/Head Start centers to help inform the schools, educators, and the community about the success of the CNMI's schools. (CNMI PSS website https://slds.cnmipss.org/our-impact.)

CNMI PSS collects student data to monitor and improve student learning and school progress and to provide services to students and staff. Student data is also used for federal and local reporting requirements. CNMI PSS collects data on demographics, enrollment, attendance, grades, special programs, assessment, course information, scheduling, graduation, and dropout rates.

CNMI PSS provides access to a variety of public and internal reports to inform decision-making and transparency. Public reports include the School Report Card, which reflects school performance on key indicators such as academic achievement, growth, attendance, and graduation; the Facts & Figures report, which provides an annual snapshot of schools and programs; and the Academic Achievement Report, offering high-level analysis of learning outcomes. Internally, role-based access tools include EDFacts submissions for federal compliance, an Administrative Dashboard for data-driven leadership, and an Early Warning System (EWS) to identify students at risk of not reading proficiently by grade 3 or promoting/graduating on time. These tools support educators, administrators, and policymakers in making informed, timely decisions that improve student success.

4.5   Data Matching

Data matching is the process of identifying individuals across datasets by using common identifiers such as first name, last name, and date of birth. This is achieved using standardized matching algorithms based on proven data matching profiles. Preprocessing ensures data is standardized and ready for matching.

4.5.1   Data Matching Compliance Process

The SLDS Data Warehouse vendor conducts data matching in accordance with industry best practices, using a leading commercial software application. The process includes defining match criteria, preprocessing the data, executing the match, and validating the results. Before match results are used in the Production environment, the vendor shares relevant data matching details with CNMI, including match logic, confidence scores, and anomalies.

4.5.2   Data Over and Under Matching

Data match results are manually reviewed to avoid over and under matching and an analysis of the match results is provided to CNMI PSS prior to its use.

4.5.3   Data Validation

Validation ensures that matched records are accurate and reliable. This may include manual reviews, comparisons with known values, and statistical testing. All matching events are documented to ensure the process is repeatable, and a statistical record is maintained to detect anomalies or declining match rates, prompting further investigation when necessary.

4.6   Data Collection

The process of requesting, approving, and implementing additions or changes to the data included in the P12 SLDS Data Warehouse is determined by the CNMI PSS and the respective Data Stewards who are responsible to define the data elements to be collected and to determine the specific data elements that are available for research. The vendor is informed of the

approved data collection requirements and who then schedules any necessary documentation and training is scheduled prior to onboarding their data.

4.6.1 Data Collection Methods

Data that is collected and uploaded to the P12 SLDS Data Warehouse is conducted through a variety of methods, including electronic data exchanges, file transfers, or direct connections.

4.6.2 Data Completeness and Validation

Data validation is done by the Data Stewards and the P12 SLDS Data Warehouse vendor to ensure that the data is accurate and complete. The vendor may compare the data provided by CNMI PSS to other sources or by using data validation rules to identify errors or inconsistencies. The vendor reviews data for completeness and notifies CNMI PSS of data that may be missing or inaccurate, e.g. missing codes or years. When necessary, the vendor transforms the data into a format that is suitable for storage in the P12 SLDS Data Warehouse. Data transformation may involve converting data to a standard format, applying business rules or mapping data to the appropriate data warehouse schema.

4.7   Data Quality

Data quality ensures a unified approach to data entry to ensure greater validity of data at the source of the data lifecycle. Data is measured on a characteristic, aspect, or feature that provides a way to classify information and data quality needs.

4.7.2 Data Quality Measures

On the P12 Data Sharing Agreement, the Data Steward, and Supervisor, agree to provide data based on quality measures that are: accurate; complete; consistent, relevant, timely, trusted, secure, accessibility, and validity.

4.7.3 Data Validation and Completeness

The SLDS Data Warehouse vendor monitors the completeness and timeliness of the data. Data Validation is performed on new data as it is received by comparing it to the current schemas in the SLDS Data Warehouse. Any data outside the schema or missing from the schema is flagged and reported to CNMI PSS.

4.8   Data Requests and Release

To support responsible data use and protect the privacy of students and staff, CNMI PSS has established clear processes for requesting and releasing data. This includes research-related requests, as well as requests from internal and external stakeholders. All requests are reviewed to ensure compliance with legal, ethical, and policy standards before data is shared.

4.8.1 Research Requests

In alignment with the CNMI PSS Board of Education Regulation § 60-20-320, all external research activities involving CNMI PSS data must undergo a formal review and approval process to ensure compliance with legal, ethical, and institutional standards. The Office of Accountability, Research and Evaluation (ARE), in partnership with the CNMI PSS Commissioner's Office, is responsible for ensuring that research requests are thoroughly vetted and appropriately documented.

The CNMI PSS Research Request Guidebook outlines the policy and process(es) for submitting, reviewing, approving or denying, fulfilling, and concluding internal (i.e., from participating agencies) and external data requests. The MOA Data-Sharing Agreement with Research Organization and the Affidavit of Non-disclosure and Data Destruction Assurance Form.

4.8.2   Data Request Process

To ensure the responsible and secure use of institutional data, the CNMI PSS has established a formal Data Request Process for internal and external stakeholders. This process ensures that all requests for data are reviewed, approved, and fulfilled in a manner that is consistent with CNMI PSS policies, and compliant with all relevant state and federal laws and regulations, including data privacy and security mandates.

4.9   Data Privacy and Security

In accordance with CNMI Board of Education Regulation § 60-30.2-370, the CNMI PSS affirms its commitment to maintaining robust data privacy and security standards in all internet-related activities. This regulation guides how students, staff, and educational stakeholders engage with the internet across all CNMI PSS schools and facilities, ensuring the safe, responsible, and ethical use of technology while protecting sensitive data and personal information.

The policies under this regulation are enforced to protect students, staff, and institutional data from misuse, while ensuring that the internet remains a powerful tool for education and engagement.

4.10   Data Destruction

The P12 Data Sharing Agreement and the CNMI PSS Data Destruction Assurance Form states that the CNMI SLDS will ensure that all data in its possession and in the possession of any subcontractors, or agents to which the CNMI SLDS may have transferred data, are destroyed or transferred to the CNMI PSS under the direction of the CNMI PSS when the Data are no longer needed for their specified purpose, at the request of the CNMI Public School System. In addition, The DGC has identified the need for a Data Destruction Policy as a Critical Data Issue and are developing a comprehensive listing of CNMI PSS school and central records and assigning the timeline for data destruction.

5.0   APPENDIX

5.1   Revision History*

Name	Date	Reason For Changes	Version
Annette Pladevega-Sablan	5/19/2022	Initial draft version 1.0	1.0
George Palican	6/9/2023	Completed remaining sections	
Geralyn DelaCruz/Jeaniffer Cubangbang	4/23/2025	Revised for Final Performance Report	

*Updates to the Appendices are not reflected in this revision history.

5.2 Related Documentation

Name	Date	Document Title	Comments
Data Governance Policy	5/20/2022	CNMI PSS Executive Data Governance Policy	Latest Version as of Oct 18, 2018
PSS Student Records	5/20/2022	§ 60-20-428 Student Educational Records	Latest Version as of July 19, 2002

FERPA Regulations	5/20/2022	34 CFR PART 99—FAMILY EDUCATIONAL RIGHTS AND PRIVACY	
Data Governance Committee - Member Commitment Letter	1/15/21	DGC Member Commitment Letter	
Data Governance Executive Leadership Member Commitment Letter	1/14/21	Data Governance Executive Leadership Member Commitment Letter	
CNMI PSS Board of Education Regulation	4/22/2025	§ 60-30.2-370 Internet Usage	

5.3 Important Terms

Term	Definition
Business Rule	A statement expressing a policy or condition that governs business actions and establishes data integrity guidelines. Example: Grade level Business Rule – To be considered eligible for kindergarten the student must be five years old by a specific date that is determined by the State.
Data Element Name	Name of a distinct piece of data. Example: Grade level data Element name = GradeLevel.
Data Management	Data management comprises all the disciplines related to managing data as a valuable resource.
Data Request	A request from an internal or external customer for data to be supplied in a specified format for a specific reason such as a report, analysis, comparison, research, etc.

EDFacts	ED*Facts* is a U.S. Department of Education initiative to put performance data at the center of policy, management and budget decisions for all K-12 educational programs. ED*Facts* centralizes performance data supplied by K-12 state education agencies (SEAs) with other data assets, such as financial grant information, within the department to enable better analysis and use in policy development, planning and management.
Metadata	A term used for data that describes a specific element or set of data. The term refers to all of the characteristics that need to be known about data in order to build databases and applications, and to effectively use data for policy and decision making.
MOU/MOA	A memorandum of understanding is an agreement between two parties in written form that outlines each party's responsibility when sharing data.
Permitted Value	Specific values that may be contained in a field. Example: Grade Level Permitted Values - K, 01, 02, 04, 05, 06, 07, 08, 09, 10, 11, 12.
ED	United States Department of Education

5.4 CNMI PSS Data Governance Committee Members

Link to updated online listing

	Data Governance Committee Members	Name / Position Title	Department	Supervisor Name Position Title
1	Student Information (Demographics and Enrollment)	Ruth Calvo Records & Data Program Mgr	ARE	Dr. Boni Pangelinan Sr Director ARE
2	Student Information (Attendance, Graduation, Dropouts, Homeless)	LouieDean Bautista Data Specialist	ARE	Dr. Boni Pangelinan Sr Director ARE
3	State Assessments	Fasefulu Tigilau State Assessment Coordinator	ARE	Dr. Boni Pangelinan Sr Director ARE
4	Special Education	Nora Fujihira Prog Mgr- Data & Compliance	SpEd	Donna Flores Director SPED
5	Head Start and Early Head Start	Jolene Sablan Family Services Manager	HS/EHS	Lathania Angui - Director Head Start/Early Head Start
6	Finance	Michael Babauta Chief Procurement Officer	Finance	Arlene Liza Finance Director
7	Advance Placement	Riya Nathrani AP District Coordinator	IT&DE	Lorraine Catienza Interim Director of ITDE
8	Human Resource Office	D'anna Tudela	HRO	Lucretia Borja Director of HRO
9	Mental Health	Josiah Kiyonka Mental Health Specialist	Mental Health	Dr. Yvonne R. Pangelinan Sr Dir - Student Support Svc
Report Stakeholders				
10	School Accountability Report Cards	Celine Orsini Accountability Program Mgr	ARE	Dr. Boni Pangelinan Sr Director ARE

11	Research & Evaluation	Femie Rey Research Evaluation Manager	ARE	Dr. Boni Pangelinan Sr Director ARE
12	EdFacts Reports and Staff Demographics	Probio Cabrera Statistical Analyst	ARE	Dr. Boni Pangelinan Sr Director ARE
13	English Language Arts	Vini Orsini	OCI	Jackie Quitugua, Senior Director of OCI
14	Math Coordinator	August Loste	OCI	Jackie Quitugua, Senior Director of OCI
IT Support				
15	SLDS Data Security & Privacy Officer	Ferdinand Ngirmekur SLDS Data Privacy Ofcr	SIT	Jesse Tenorio Director State IT
16	SLDS Technical Manager	Jeaniffer Cubangbang SLDS Technical Manager	ARE	Dr. Boni Pangelinan Sr Director ARE
17	IT Support (State IT Network)	Albert Camacho Network Specialist	SIT	Jesse Tenorio Director State IT
DGC ADVISORS (Non-Voting)				
18	ARE SLDS	Geralyn Delacruz / Data Governance Mgr	SLDS	Dr. Annette Pladevega Project Director
19	DG Exec Leadership	Dr. Boni Pangelinan Sr Director ARE	COE	Dr. Lawrence Camacho Commissioner of Education
20	DG Exec Leadership	Jesse Tenorio Director State IT	COE	Dr. Lawrence Camacho Commissioner of Education
21	ARE SLDS	Dr. Annette P Sablan SLDS Project Director	ARE	Dr. Boni Pangelinan Sr Director ARE
DGC Support Staff (Non-Voting)				
22	SLDS	Project Specialist	ARE	
23	ARE	Ezra Rabauliman	ARE	Dr. Boni Pangelinan Sr Director ARE

5.5   References

CNMI SLDS Data Sharing Agreement DSA TEMPLATE
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