



MEMORANDUM OF UNDERSTANDING

between

**CNMI DEPARTMENT OF COMMERCE,
CNMI DEPARTMENT OF FINANCE,
CNMI DEPARTMENT OF LABOR,
NORTHERN MARIANAS COLLEGE,
NORTHERN MARIANAS TECHNICAL INSTITUTE, and
CNMI PUBLIC SCHOOL SYSTEM**

This MEMORANDUM OF UNDERSTANDING (hereinafter referred to as “MOU”) is made by and between the CNMI Department of Commerce (“DOC”), the CNMI Department of Finance (“DOF”), the CNMI Department of Labor (“DOL”), Northern Marianas College (“NMC”), Northern Marianas Technical Institute (“NMTECH”), and the CNMI Public School System (“PSS”) (collectively referred to as the “Parties”).

PREAMBLE

The Parties hereby enter into this MOU in order to formally establish the CNMI P-20W (Preschool through Workforce) Data Governance Program (hereinafter referred to as the “Program”).

WHEREAS, DOC is an executive department of the CNMI Government charged with fostering the conditions for economic growth and opportunity within the CNMI. Through its divisions and offices, DOC works to help stimulate the CNMI economy by promoting a robust business environment, attract private capital investment, and drive job creation for US workers in the CNMI; and

WHEREAS, DOF is an executive department of the CNMI Government responsible for managing the CNMI Government’s finances and resources effectively. As the primary steward of the

CNMI's economic and financial systems, DOF engages in a wide range of activities such as advising the Governor and the Legislature on economic and financial issues, promoting sustainable economic growth, and maintaining systems critical to the CNMI's financial infrastructure such as revenue collection, disbursement of payments to CNMI agencies, private entities, and residents, and the borrowing of funds necessary to run the CNMI Government; and

WHEREAS, DOL is an executive department of the CNMI Government tasked with administering and enforcing locally entitled wages, overtime premiums and recordkeeping requirements as well as ensuring compliance with applicable federal labor standards within the CNMI workforce. DOL is also responsible for educating the community and enforcing local statutory labor requirements within CNMI's private sector; and

WHEREAS, NMC is the only public institution of higher education in the CNMI and is accredited by the Senior College and University Commission of the Western Association for Schools and Colleges. With its mission of stewardship through scholarship, NMC aims to transform lives, create opportunities, and empower the CNMI workforce by offering associate and bachelor's degree programs, as well as a variety of professional development and personal enrichment certificate programs; and

WHEREAS, NMTech is an educational institute in the CNMI and seeks to foster the professional growth and development of students who have a keen interest in the technical and trades fields. NMTech offers hands-on learning in a variety of technical courses beyond a traditional classroom setting in areas specific to construction, automotive, culinary, and hospitality; and

WHEREAS, PSS is the state agency for pre-school, elementary, and secondary education programs in the CNMI and offers special programs in early interventions and its Head Start program for children ages three to four. With its mission of educating lifelong learners to become productive citizens of a global society, PSS aims to provide quality education by empowering all individuals to be innovative thinkers and learners; and

WHEREAS, the Parties share a collective commitment to establish a partnership and formal framework for effective data governance across and within the entities outlined in this partnership in order to ensure the quality, integrity, and accessibility of data for informed decision-making, accountability, and continuous improvement across the CNMI's educational and workforce development ecosystem;

NOW, THEREFORE, in consideration of the above-stated provisions and of the terms and conditions stated below, the Parties agree as follows:

DECLARATIONS AND UNDERSTANDING

1. THE PARTIES HEREBY AGREE:

- 1.1. To formally establish the CNMI P-20W Data Governance Program, which will oversee the comprehensive management and governance of data contributed by

entities under the Program to the CNMI Statewide Longitudinal Data System (SLDS);

- 1.2. To work together in such a manner that would promote a genuine atmosphere of collaboration and alliance in support of the Program;
- 1.3. To establish channels of communication that will facilitate the implementation of the Program and the execution of the partnership outlined in this MOU;
- 1.4. To work together to develop and establish a data governance structure, roles and responsibilities of each entity under the Program, and policies and processes that will define how data will be managed purposefully and consistently throughout the information lifecycle;
- 1.5. To establish an Executive Leadership consisting of representatives from each of the entities under the Program as the top tier of the Program to provide oversight of the overall data framework, governance, and management;
- 1.6. To identify additional agencies that may contribute data that aligns with the goals and objects of the Program.

2. CNMI DEPARTMENT OF COMMERCE (DOC) HEREBY AGREES:

- 2.1. To contribute data related to economic development, business growth, and industry trends, which will provide valuable insights into the economic impact of education and workforce development programs.

3. CNMI DEPARTMENT OF FINANCE (DOF) HEREBY AGREES:

- 3.1. To contribute financial data and budgetary information, shedding light on fiscal matters, taxation, and budget allocation, thereby enabling a comprehensive understanding of the financial aspects of education and workforce development programs within the P-20W SLDS.

4. CNMI DEPARTMENT OF LABOR (DOL) HEREBY AGREES:

- 4.1. To provide workforce-related data, such as employment outcomes, wage data, and labor market trends, to enhance the SLDS's workforce development insights.

5. NORTHERN MARIANAS COLLEGE (NMC) HEREBY AGREES:

- 5.1. To contribute data related to post-secondary education, including enrollment, degree attainment, and course completion data, to enrich the P-20W SLDS.

6. NORTHERN MARIANAS TECHNICAL INSTITUTE (NMTech) HEREBY AGREES:

- 6.1. To provide data pertaining to technical and vocational education, including enrollment, program completion, and employment outcomes, to augment the P-20W SLDS with technical education insights.

7. CNMI PUBLIC SCHOOL SYSTEM (PSS) HEREBY AGREES:

- 7.1. To provide educational data, including student enrollment, academic performance, attendance, and demographic information, to support the P-20W SLDS.

8. OTHER PARTICIPATING AGENCIES (AS IDENTIFIED AND AGREED UPON BY THE DATA GOVERNANCE Executive Leadership) HEREBY AGREES:

- 8.1 To contribute data that aligns with the goals and objectives of the P-20W SLDS.

9. GENERAL TERMS AND CONDITIONS:

- 9.1 It is understood that each of the Parties hereto are joined for the purpose of this MOU. The Program, its Executive Leadership, and the Parties agree to indemnify and hold harmless each other and their respective officers, directors, employees, and agents from and against any and all claims, actions, liabilities, losses, damages, expenses, and costs (including, but not limited to, reasonable attorneys' fees) arising out of or related to the implementation of the Program except to the extent caused by the willful misconduct or gross negligence of any entity under this MOU.
- 9.2 This MOU takes effect immediately upon the signing of all Parties and shall remain in effect continuously until terminated in writing by either party (with a minimum of 60-day notice of intent to rescind or terminate).
- 9.3 Any notice demand, request, consent, or approval that either party hereto may give or is required to give the other, shall be in writing, and shall be either personally delivered or sent by first class mail in a postpaid envelope, addressed as follows:

Remedio Mafnas
Acting Secretary of Commerce
CNMI Department of Commerce
Caller Box 10007
Saipan, MP 96950

Leila Staffler
Secretary of Labor
CNMI Department of Labor
Caller Box 10007
Saipan, MP 96950

Tracy Norita
Secretary of Finance
CNMI Department of Finance
PO Box 5234
Saipan, MP 96950

Galvin Deleon Guerrero, EdD
President
Northern Marianas College
PO Box 501250
Saipan, MP 96950

Jodina Attao
Chief Executive Officer
Northern Marianas Technical Institute
PO Box 504880
Saipan, MP 96950

Lawrence Camacho, EdD
Commissioner of Education
CNMI Public School System
PO Box 501370
Saipan, MP 96950

8. MISCELLANEOUS

The Parties shall comply with all laws, Commonwealth or Federal, as well as all rules and regulations. The laws of the US and CNMI shall govern this MOU.

This MOU comprises the entire and integrated agreement of the Parties and supersedes all prior agreements and understandings, oral or written, between the Parties regarding the Program.

IN WITNESS WHEREOF, the Parties have hereunto caused the Agreement to be executed on

_____, 2023.

Feb 27, 2024

Remedio Mafnas
Acting Secretary
CNMI Department of Commerce

Feb 28, 2024

Tracy Norita
Secretary
CNMI Department of Finance

Mar 6, 2024

Leila Staffler
Secretary
CNMI Department of Labor

Feb 28, 2024

Galvin Deleon Guerrero, EdD
President
Northern Marianas College

Feb 27, 2024

Jodina Attao
Chief Executive Officer
Northern Marianas Technical Institute

Mar 4, 2024

Lawrence Camacho, EdD
Commissioner of Education
CNMI Public School System

ATTACHMENT A:

CNMI P-20W Data Governance Program Charter

In accordance with the Memorandum of Understanding (“MOU”) between the CNMI Department of Commerce (“DOC”), the CNMI Department of Finance (“DOF”), the CNMI Department of Labor (“DOL”), Northern Marianas College (“NMC”), Northern Marianas Technical Institute (“NMTech”), and the CNMI Public School System (“PSS”) (collectively referred to as the “Parties”), the following are the scope, structure, roles and responsibilities, policies and processes, and definitions of terms used within the MOU:

I. Introduction

The CNMI P-20W Data Governance Program Charter is a foundational document that establishes the framework for effective data governance within our educational and workforce institutions. It outlines our commitment to managing P-20W (Preschool through Workforce) data resources responsibly, securely, and in accordance with regulatory requirements. This charter serves as a guiding light, defining roles, responsibilities, and principles to ensure the quality, integrity, and accessibility of data for informed decision-making, accountability, and continuous improvement across our educational and workforce ecosystem.

II. Scope

The scope of the CNMI P-20W Data Governance Program, as established in Sections 1-8 of this MOU, ensures the availability, usability, integrity, and security of data contributed by these agencies. This includes defining data standards, policies, procedures, and processes for collection, maintenance, sharing, and dissemination. It also encompasses data stewardship, ownership, quality assurance, access control, security, and risk management for these information assets.

III. Data Governance Structure

The structure for the CNMI P-20W Data Governance Program reflects the collaboration among and individual autonomy of each Partner Agency. This structure, as outlined in Figure 1, is an extension of the Data Governance Executive Policy approved by the CNMI Board of Education in 2018. Data Governance guidelines for collecting, managing, securing, and utilizing data are integral to the SLDS.

The Data Governance Structure for the CNMI P-20W Data Governance Program consists of two tiers, following the data governance guidance of the Institute of Education Sciences SLDS Grant Program. This two-tiered structure for the CNMI P-20W Data Governance Program ensures the Executive Leadership focuses primarily on CNMI-wide strategic decision-making and policy

changes and the Data Governance Committee (DGC) develops policies and processes for managing the P-20W SLDS data and addresses operational critical data issues affecting the system.

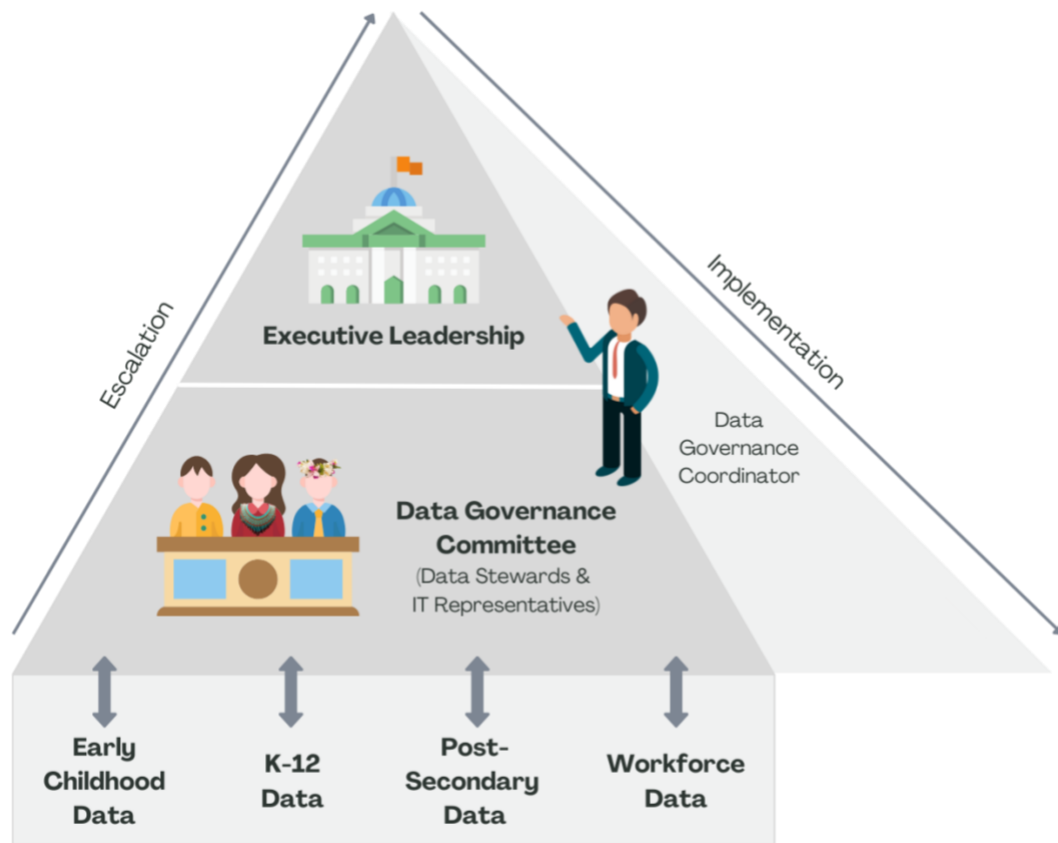


Figure 1: Two-tiered data governance structure

IV. Roles and Responsibilities

a. Executive Leadership

- i. Composition: Executive Leadership is the top tier of the CNMI P-20W Data Governance Program composed of the chief executive, or designated representative, of each Partner Agency and the Data Governance Coordinator, who serves as the facilitator and liaison with the Data Governance Committee.
- ii. Duties: Executive Leadership provides oversight of the overall data framework, governance, and management. To ensure data governance is implemented and to provide program and policy direction (priorities), the group has the following responsibilities:
 1. Demonstrating that data governance is a priority of the agency and modeling actions to staff members accordingly;

2. Creating the Data Governance Committee and appointing committee members;
 3. Approving this P-20W Data Governance Program Charter;
 4. Establishing policy priorities to guide the development and utilization of data within the P-20W system;
 5. Approving data policies and major data-related decisions proposed by the Data Governance Committee;
 6. Resolving issues escalated by the Data Governance Committee;
 7. Ensuring that the SLDS has the necessary resources, both human and fiscal, to effectively carry out its functions;
 8. Holding staff accountable for participating in the data governance program and adhering to this P-20W Data Governance Program.; and
 9. The establishment of meetings at least twice a year to review process and make necessary adjustments in accordance with the program's goals and objectives.
- iii. Individual Member Responsibilities: Individual members of the Executive leadership are responsible for:
1. Appointing their agency's Data Governance Committee members;
 2. Ensuring coordination between their agency's data governance program and the P-20W data governance program;
 3. Modeling and advocating data governance principles with internal and external groups;
 4. Communicating with the Data Governance Committee members who report to them to prepare for each Executive Leadership discussion and decision; and
 5. Holding all their staff responsible for adhering to the data policies and processes established through data governance.

b. Data Governance Coordinator

- i. The Data Governance Coordinator is responsible for leading the overall direction and implementation of the data governance program.
- ii. Duties: The Data Governance Coordinator:
 1. Facilitates the escalation and resolution of issues among the data governance groups;
 2. Serves as the facilitator of the Executive Leadership;
 3. Leads the Data Governance Committee;
 4. Convenes working groups of Data Stewards to address critical data issues that span multiple agencies; and

5. Provides training and support to ensure that all data governance members have the knowledge and skills necessary to fulfill their roles.

c. Data Governance Committee

- i. Composition: The Data Governance Committee is the second tier of the CNMI SLDS Program and is composed of Data Stewards and IT Representatives appointed by the executive leadership of each partner agency. Members of the DGC should have the trust and approval of their agency executive leadership to represent the agency in interagency decision-making. The Data Governance Coordinator serves as the Chairperson of the Committee.
- ii. Duties: The Data Governance Committee is responsible for:
 1. Establishing, documenting, and enforcing interagency data standards, policies and processes, such as master data management and the data request policy and process;
 2. Identifying, prioritizing, and supporting the resolution of critical data issues that affect the quality, availability, and use of data (e.g., new legislation requiring additional public reporting, replacement of a source system);
 3. Authorizing the release of data, including public reporting and data requests;
 4. Establishing and monitoring the progress of workgroups of Data Stewards to research and propose recommendations for addressing prioritized data issues;
 5. Escalating to the Executive Leadership policy recommendations for approval as well as issues that are controversial, highly visible, or are at high risk; and
 6. Communicating to Data Stewards and IT Representatives any interagency data system changes and their potential impact on source systems.
- iii. Individual Member Responsibilities:
 1. Understanding the universe of data contributed by their agencies to the interagency data system;
 2. Modeling and advocating data governance principles with internal staff and other external stakeholders;
 3. Attending DGC meetings and participating in the decision-making process;
 4. Ensuring that their agencies' Data Stewards and other staff adhere to the policies and decisions of the DGC;

5. Communicating with the DGC any data issues, regulations, plans, and policies from their agency that could affect other agencies or the SLDS; and
6. Communicating with their agency staff about the activities and decisions of the DGC.

d. Data Stewards:

- i. Composition: Data Stewards are staff members who have detailed knowledge about their agencies' source systems that contribute data to the interagency data system. Each participating agency should be represented by one Data Steward.
- ii. Duties: Data Stewards are responsible for:
 1. Documenting and maintaining metadata on source systems and their agencies' data elements in the interagency data system;
 2. Documenting agency processes for preparing and submitting data to the interagency data system;
 3. Developing the data element definitions and business rules for integrating data in the interagency data system;
 4. Identifying and communicating the quality of their agencies' data that are contributed to the interagency data system;
 5. Communicating any identified source system data quality issues to their agency for resolution;
 6. Communicating source system changes that could affect the interagency data system;
 7. Informing calculation of metrics (including alignment with agency policies) for interagency reporting that includes their agency's data;
 8. Reviewing and making recommendations for approval of data releases that include their agency's data;
 9. Collaborating with other Data Stewards to ensure that the interagency data meet all participating agency data use needs;
 10. Communicating their agency's policies and needs for data privacy, security, and archiving; and
 11. Participating in ad hoc and standing working groups as designated by the DGC to address a specific problem or issues or to support an ongoing data initiative.

e. IT Representatives:

- i. Composition: IT Representatives are designated staff members from each Partner Agency who may include roles such as developers, business analysts, and database administrators. IT representatives should know the

interagency data model and current infrastructure and how they support the state's IT strategic plan. Each participating agency should be represented by one IT Representative.

ii. **Duties:** IT Representatives are responsible for:

1. Understanding of the interagency data model and the current IT infrastructure that supports the CNMI's IT strategic plan;
2. Supporting the data governance program by providing technical expertise and guidance;
3. Having familiarity with the various data systems within their agency, especially those that contribute data to the interagency data system;
4. Communicating any changes or updates to their agency's systems that could impact the interagency data system;
5. Ensuring that the data governance program aligns with the CNMI's IT strategic plan;
6. Participating in ad hoc and standing working groups as designated by the DGC to address a specific problem or issues or to support an ongoing data initiative;
7. Collaborating with Data Stewards to ensure that the interagency data system meets the data needs of all participating agencies;
8. Understanding and communicating their agency's policies and needs regarding data privacy, security, and archiving; and
9. Supporting interagency reporting, making sure that the data aligns with agency policies and needs for reporting purposes.

V. POLICIES AND PROCESSES

Data policies and processes define how data will be managed purposefully and consistently throughout the information lifecycle in support of the data governance program's purpose. All P-20W 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); 1 CMC § 2378 the Division of Youth Services (DYS) Access to Student Records; and Article 3. the Commonwealth Statistical Act of 1990, Public Law: 7-35.

The P-20W Data Governance Program develops, implements, maintains, and enforces the following types of data policies and processes:

- a. **SLDS Expansion:** Documenting and implementing the policy and process

for adding datasets and data sources to the system.

- b. **Metadata:** Documenting and implementing a process for capturing, maintaining and making available metadata, including a data collection calendar and a data dictionary.
- c. **Master Data Management:** Determining and documenting the source of record for enterprise data elements contributed by more than one source.
- d. **Data Matching:** Documenting and implementing a data matching process, including quality controls to reduce over- and under-matching.
- e. **Data Collection:** Overseeing the creation and implementation (by all agencies involved) of the process to prepare and submit data to the system, and the notification process for changes to data collected.
- f. **Data Destruction:** Documenting and implementing a data destruction policy and associated processes to ensure compliance by participating entities and external data requesters.
- g. **Data Quality:** Documenting and implementing policies and processes to ensure that data are accurate, complete, timely, and relevant to stakeholder needs.
- h. **Data Use Priorities:** Documenting and implementing a research or data use agenda that is used to prioritize the creation of data products as part of the data request process.
- i. **Data Requests:** Documenting and implementing a data request policy and associated process for submitting, reviewing, approving or denying, and fulfilling data requests.
- j. **Data Sharing Agreements:** Overseeing the development, maintenance, and enforcement of data sharing agreements.
- k. **Data Release and Reporting:** Documenting and implementing a data release policy and associated process for ensuring that data and data products from the system have been (1) validated by the appropriate individual(s) or entities and (2) created in accordance with reporting standards to ensure sufficient data privacy, quality, and consistency over time.
- l. **Data Privacy and Confidentiality:** Documenting and implementing a data privacy and confidentiality policy as well as associated processes and training to ensure that all relevant federal and state privacy and confidentiality laws are followed by participating entities and external data requesters.
- m. **Data Security:** Developing and implementing a data security policy and associated protections to ensure that data are securely transmitted and stored, including responding to data breaches.

VI. Definitions: Specific terms used within this document

Term	Definition
<i>Database</i>	A repository that serves as a mechanism for the storage, description and management of data elements and information.
<i>Data Collection</i>	The systematic process of acquiring and compiling educational and workforce data from various sources within the P-20W education and workforce development ecosystem.
<i>Data Element</i>	Distinct type of data field that represents a specific attribute or characteristic, such as "date of birth," "ethnicity," or "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, or group of organizations' data.
<i>Data Governance Structure</i>	The organized framework and hierarchical arrangement of groups and individuals responsible for enacting data governance within the P-20W partnership. It outlines the roles, responsibilities, and relationships of key stakeholders involved in managing and overseeing data-related activities.
<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, Security, and other data protection efforts.
<i>Data Request</i>	Formal requests made by internal or external agencies for specific purposes, such as generating reports, conducting analyses, making comparisons, evaluations, or research.
<i>FERPA (Family Educational Rights and Privacy Act)</i>	A federal law (20 U.S.C. § 1232g; 34 CFR Part 99) designed to protect the privacy of student education records. FERPA applies to educational institutions that receive funding from the U.S. Department of Education and establishes rules and requirements for the handling and disclosure of student records.