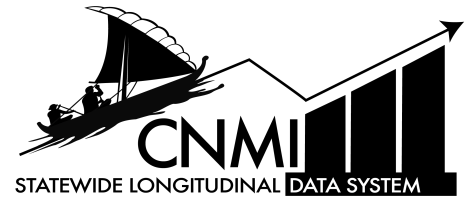


# Data Collection Policy

CNMI P20W Data Governance Committee



## REFERENCES:

Originator	CNMI P20W Data Collection Subcommittee
Effective Date	May 28, 2025
Approved by	CNMI P20W Executive Leadership
Statutory Reference	<ol style="list-style-type: none"><li>1. <a href="#">Family Educational Rights and Privacy Act (FERPA) of 1984 (20 U.S.C. Sec. 1232g; 34 CFR Part 99);</a></li><li>2. <a href="#">Internal Revenue Code of 1954 (26 CFR Part 601)</a></li><li>3. <a href="#">CNMI State Board of Education Regulations (Title 60-20)</a></li><li>4. <a href="#">CNMI Statistical Act of 1990 (CNMI P.L. 7-35)</a></li><li>5. <a href="#">Establishment of Northern Marianas Technical Institute (3 CMC §12104)</a></li><li>6. <a href="#">Establishment of Department of Commerce: 1 CMC §2451</a></li><li>7. <a href="#">Establishment of Department of Finance: 1 CMC §2551</a></li><li>8. <a href="#">Establishment of Department of Labor: 1 CMC §2831</a></li><li>9. <a href="#">Establishment of Department of PSS: 1 CMC §2251</a></li><li>10. <a href="#">Establishment of Department of NMC: 3 CMC §1304</a></li></ol>

## PURPOSE:

The purpose of this policy is to establish a clear framework for the responsible collection and management of data into the P20W (Pre-K through Workforce) data warehouse in compliance with CNMI and federal laws. The goal is to ensure that data is collected efficiently to support research, policy-making, and program evaluation.

## SCOPE:

This policy applies to all individuals, entities, and organizations involved in the collection and management of P20W data. These include:

- Employees and representatives of all agencies in the CNMI P20W partnership,
- Contractors engaged in data-related activities,
- Workforce development programs and other organizations involved in P20W data collection.

## DEFINITIONS:

1. P20W Data: Data that spans from early childhood (Pre-K) through workforce education and employment.
2. Data Governance Committee: The overall management of the availability, usability, integrity, and security of data.
3. Personally Identifiable Information (PII): Information that can be used to distinguish or trace an individual's identity either directly or indirectly.
4. Data Integrity: The accuracy, completeness, and consistency of data throughout its lifecycle.
5. Data Steward: Staff members who have detailed knowledge about their agencies' source systems that contribute data to the interagency data system.

## RELATED DOCUMENTS:

1. [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](#)

## STATEMENT:

This policy establishes key principles and rules governing the responsible collection of P20W data across participating agencies. The policy is guided by the following core collection principles:

1. Collection Standardization
  - All data must be collected using common methods, formats, and elements to ensure comparability and integration across the P20W system.
2. Collection Timeliness
  - Agencies must adhere to established collection schedules and timeframes to ensure data currency and availability for analysis.
3. Collection Accuracy
  - All collected data must undergo validation processes and quality assurance checks to maintain integrity before entry into the P20W data warehouse.
4. Collection Documentation
  - Agencies must thoroughly document all collection methods and source requirements to ensure consistency and reliability.
5. Collection Security
  - All data collection activities must implement appropriate security measures to protect data during the collection phase.
6. Collection Efficiency
  - Processes should minimize duplication of effort and burden on reporting entities while maintaining data quality.

## 7. Collection Management

- Establish clear processes for tracking, storing, and overseeing collected data to ensure proper handling from initial entry through integration into the P20W system.

## **RESPONSIBILITIES:**

The implementation and compliance with this policy depend on the collective roles and responsibilities of various entities and individuals involved in P20W data collection and management. These include:

1. CNMI P20W partner agency shall:
  - a. Be responsible for overseeing the policy's implementation, ensuring compliance with applicable CNMI and federal laws, and conducting periodic reviews to maintain its relevance and effectiveness.
2. CNMI P20W Executive Leadership shall:
  - a. Review and approve data collection from their respective agencies.
3. CNMI SLDS program shall:
  - a. Be responsible for ensuring the effective implementation of this policy
  - b. Report all data collection incidents to CNMI P20W Executive Leadership
  - c. Provide technical assistance and capacity-building to agencies to improve data collection quality and consistency.

## **COMPLIANCE**

Adherence to this policy is voluntary. Compliance will be monitored through regular audits, continuous monitoring, self-assessments, and incident reporting. Enforcement actions for violations may include additional training.

## **TRAINING:**

- Outreach and awareness training will be conducted in phases at each partner agency by the CNMI P20W Data Governance Committee to keep informed about the importance of data protection.
  - Phase 1 (Goals), Phase 2 (Process), Phase 3 (Content)
- Personnel directly involved in data collection shall receive regular training on data collection procedures and security best practices.

## **COMMUNICATION:**

- This policy shall be distributed to all CNMI P20W Data Governance Committee members and their agency personnel directly involved in the implementation of data transfer from their source to the SLDS P20W data warehouse.
- This policy will be stored electronically for access on a secured shared drive: [P20W DGC Approved Policies](#)
- This policy will be available on all P20W partner agency websites.

**REVISION HISTORY:**

VERSION	DATE	DESCRIPTION OF CHANGE
1.0	05/2025	Initial policy