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Early Childhood Data Governance in Action! Initial Steps to Establish Data Governance

Data governance provides a means to establish a common vision for early childhood data use in the state, with key policy and program decisions supporting that vision. Further, when data governance is effectively established, the quality and security of data collected, reported, and used by early childhood programs and agencies is enhanced; staff burden is reduced; and communication, collaboration, and relationships across the various agencies and programs and information technology (IT) staff are improved.

This document describes the initial, concrete steps necessary to establish data governance for an early childhood integrated data system (ECIDS). It is intended to support states beginning the process of developing their early childhood data governance program.

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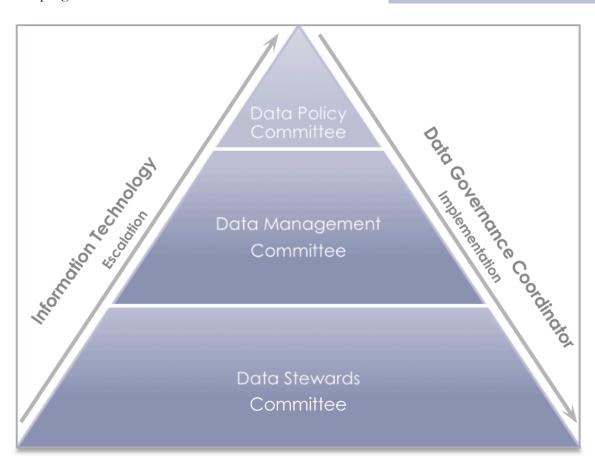


Figure 1: Early Childhood Data Governance Roles and Groups

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Areas to Address

The work of establishing data governance is comprised of three primary aspects: Organizational Structure; Operational Plan; and Processes and Decisions.

Organizational Structure

Establishing the structure of data governance is a critical initial step to ensure representative groups at the leadership and implementation levels have the authority to make collective decisions about the information assets and understand their role within the broader ECIDS effort. The organizational structure encompasses the groups and individuals involved in data governance and the relationships among them. A typical data governance structure includes four critical groups as well as the data governance coordinator (see Figure 1): (1) a data policy committee, (2) a data management committee, (3) data stewards, and (4) IT personnel. Members of these groups should have the authority to make the key decisions outlined for the work and understand when to escalate an issue to another group in the data governance structure.

Initial Steps

- 1. Identify a Data Governance Coordinator.
- 2. Determine which agencies, programs, or other entities need to be represented in the governance structure.
- 3. Determine which roles within those agencies, programs, or other entities need to be represented at the leadership and implementation levels.
- 4. Invite the individuals serving in those roles to become a member of either the data policy or data management committee.
- 5. Host a kickoff meeting to introduce (or reacquaint) participants with the purpose, scope, and work of data governance, including their role and responsibilities within the effort.

Organizational Structure Best Practices

- ✓ Appoint or hire a Data Governance Coordinator who can communicate among leadership, program areas, and technical personnel.
- Ensure that every agency, program, and entity that will be sharing data with the ECIDS has representation within the data governance structure at both the leadership (policy) and implementation levels.
- ✓ Identify the *roles* that should be included in the governance structure from each participating entity, not just the individuals. Establishing membership criteria will help with staff transitions and sustainability over time.
- ✓ If the executive leaders who comprise the data policy committee already have a standing meeting, establish a standing agenda item for data governance as part of that meeting instead of creating another meeting.
- ✓ Make attendance at data governance meetings mandatory. If a member cannot attend, a proxy must be sent.
- ✓ Establish an induction process for new members of any data governance group. Provide them with the policy and manual, and consider setting them up with an experienced mentor to help them understand the expectations for their role, and how to effectively fulfill their responsibilities.

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Operational Plan

The operational plan encompasses how the work of data governance will be managed and codified, and over time, institutionalized. Clarifying the decisionmaking process and defining the roles and responsibilities for each group are instrumental to the operational plan and to the success of the data governance effort. Three primary resources comprise the operational plan: the data governance policy or charter, the data governance manual, and memoranda of understanding (MOUs) among the participating agencies or other entities that will be sharing data.

Data Governance Policy/Charter

The data governance policy or charter formally establishes data governance and demonstrates state and participating agency leadership's a) acknowledgement that data are a critical resource, and b) commitment that data will be managed and used as such in support of the state's early childhood vision and goals. The policy details the scope of the data governance effort, establishes and grants authority to the key groups and roles within the data governance structure, and defines key terms. For additional information, please see the *Early Childhood Data Governance Policy Guide and Template* (available on the GRADS website in the Public Domain Clearinghouse).

Data Governance Manual

The data governance manual is built upon the foundation of the data governance policy; it details how the policy will be put into practice. The manual describes the data governance structure, processes, roles, responsibilities, and membership that will be established and to which participants will be held accountable in the governance of data. It also defines the decisionmaking authority and process for each group, including how issues will be communicated, escalated, and resolved between groups. The manual is an important resource for orienting and training staff new to data governance and for ensuring that all members understand the expectations of their role. For additional information, see the *P-20+ Data Governance Manual Template* (available on the GRADS website in the Public Domain Clearinghouse).

MOUs

Data-sharing MOUs or agreements are essential to establish the legal authority to share data between entities and guidelines for (1) what data will be shared, (2) for what purposes the data will be shared, and (3) how the data will be shared.

For additional information, see Legalities of Data Sharing and the Issue of Commonality: SLDS Webinar Summary, http://nces.ed.gov/programs/slds/pdf/legalities-webinar.pdf and Checklist: Data Sharing Agreement, http://ptac.ed.gov/sites/default/files/data-sharing-agreement-checklist.pdf



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Initial Steps

- 1. Draft the data governance policy (this can be done by the Data Governance Coordinator or the data management committee, if already formed).
- 2. Have executive leaders from all participating organizations sign the policy.
- 3. Determine the decisionmaking process for each group and the issue escalation/resolution process across groups.
- 4. Draft the data governance manual (usually done by the Data Governance Coordinator).
- 5. Obtain feedback on the draft data governance manual from the data management committee.
- 6. Determine how many MOUs need to be created, and between which parties.
- 7. Draft the MOUs (usually a collaboration between the Data Governance Coordinator and legal counsel from relevant agencies and/or organizations).
- 8. Have leadership and applicable legal counsel sign off on MOUs.

Operational Plan Best Practices

- Consider creating a master MOU template for all parties sharing data as part of the ECIDS, and attach addenda to it that detail the specifics of what data will be shared for which purposes.
- ✓ Establish a regular review cycle of both the policy and manual to ensure they remain current and accurately reflect the data governance effort.
- ✓ Post the policy and manual in a location accessible to all members of the data governance effort.
- Whenever a new data governance policy or process is established, either attach it as an addendum to the data governance manual or reference its location in the manual.

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Processes and Decisions

Once the data governance structure and operations have been established, the governance groups begin planning and tackling the actual management of ECIDS data throughout the data lifecycle from collection through to reporting. The following are foundational topics that should be addressed via the data governance process by establishing a policy that describes the overall approach, and a more detailed process document that details the specific steps, responsible parties, and timeline. *Note: The following processes and associated decisions should inform the technical design of the ECIDS*.

Scope – what will be included/integrated?

Examples of key questions to be addressed:

- What are the critical questions that must be answered with data to support the ECIDS goals and strategies?
- What data are necessary to answer these critical questions?
- Which agencies and programs collect these data?
- What is the process (policy and mechanics) for adding an additional source system to the ECIDS?

Integration – how will data from multiple sources be brought together and normalized?

Examples of key questions to be addressed:

- How will the ECIDS unique identifier be generated and maintained?
- If the same data are collected in more than one source system, how will the system of record for the ECIDS be determined?
- What is the process for reconciling disparate definitions of and/or code sets for the same data element?
- How will changes in an element over time for the same individual (e.g., race or gender) be handled in the ECIDS?

Refresh – how often and how will data be updated?

Examples of key questions to be addressed:

- How current do you need each source of data to be for the intended uses?
- Are there any interdependencies among sources regarding the sequence of refreshing the data?
- How will you document and communicate the refresh cycle for each source with the relevant data governance representative(s)?
- How will you document the age of the data in reports or other releases to external parties?

Changes – how will changes in source systems be handled?

Examples of key questions to be addressed:

- Which data governance representative from each participating entity or program is responsible for communicating upcoming changes to the source system that will affect the ECIDS?
- How are responsible representatives expected to communicate upcoming changes to the source systems to the data governance group (timing and documentation)?
- How will changes to source system definitions, code sets, etc. be reflected in the ECIDS, including the metadata for longitudinal reports/analyses?

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Access – who will have what level of access to the ECIDS?

Examples of key questions to be addressed:

- How many and what type of user roles are necessary?
- Who decides which user roles have what level of access?
- Which user roles (if any) will have access to individual-level data?
- Who will manage user accounts and access rights?
- How will you ensure compliance with all relevant federal and state privacy laws and regulations?

Requests – how will external requests for data be reviewed and responded to?

Examples of key questions to be addressed:

- What must data requesters submit to request data?
- Who is responsible for reviewing and responding to data requests?
- How often will data requests be reviewed?
- Will certain types of requesters be given priority (e.g., legislature, press, public, etc.)?
- What protocols will be put in place to ensure child and student privacy?
- Will you charge any type(s) of users for data requests?

Releases – how will reports and other data products be identified, produced, and released?

Examples of key questions to be addressed:

- How will you engage key stakeholders in determining the top priority enhancements or additions to the information resources produced by the ECIDS?
- What criteria will you use to consistently prioritize requests from different user groups?
- How will you communicate the release of new information resources from the ECIDS?
- How will you garner feedback from intended user groups regarding draft products?

Initial Steps

- 1. Establish a critical data issues log to identify, describe, prioritize, assign responsibility for, and track progress towards resolving important issues. The data management committee should create a set of criteria for determining what constitutes a critical data issue.
- 2. Make the updating of the critical data issues log a standing agenda item of the data management committee.
- 3. Create a central electronic repository of all data governance policies and processes that is accessible by all data governance members.
- 4. Establish a regular review and revision cycle for policies and processes to ensure they stay current and accurately reflect the work as it is conducted.

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Additional Resources

- Early Childhood Data Governance Policy Guide & Template (available upon request)
- Early Childhood Data Governance Manual Guide & Template (available upon request)
- Early Childhood Planning Guide (http://nces.ed.gov/programs/slds/pdf/Early_Childhood_Planning_Guide.pdf)
- Planning for Early Childhood Data Use: Webinar Summary
 (http://nces.ed.gov/programs/slds/pdf/webinar_summary_early_childhood_data_use.pdf)
- Early Childhood Data Use: Create Phase: Webinar Summary (http://nces.ed.gov/programs/slds/pdf/EC DataUse Part2 Webinar March2013.pdf
- Early Childhood Data Use: Support Phase: Webinar Summary (http://nces.ed.gov/programs/slds/pdf/EC_DataUse_Part3_Webinar_Sept2013.pdf)