Sept 2016

Data Direction 1: **Creating and Managing a Data Governance Entity**

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This is one of a set of five "Data Directions" that present issues ECE staff may encounter if they are interested in or attempting to share or link their data with other agencies. Each Data Direction presents a hypothetical scenario, and then outlines possible action steps programs could use to address the issues raised. This first Data Direction offers ideas about how to set up and structure a data governance entity, including who to invite to join such a group, roles and responsibilities for members, and how to develop data-use policies.

The mayor's office approached a Head Start grantee that has eight center-based sites with a request to link their early childhood data into a city-level integrated data system. The city intends to integrate data from all federal-, state-, and city-funded programs for young children and their families so that they can better understand how well they are meeting the needs of children in the city. The city has a city-wide data governance group and asked the Head Start grantee to consider participating on the data governance group if their data will be included in the initiative. The Head Start director agreed to consider the request and is excited about the possibility of having additional information about the children and families they serve if they participate in this project. She also hopes that city leaders might invest more resources in early childhood programs if analyses with the linked data demonstrate a significant unmet need for children and families living in the city.

Ms. Chao, the data manager for the Head Start grantee, is responsible for coordinating the data collection efforts across the grantee's eight sites and has been asked by the Head Start director to work with the city on this request. To date, Ms. Chao has only worked with the data for internal program reporting, ongoing monitoring, and self-assessment purposes. She has never been asked to share data with an outside organization. Before moving ahead with this request to link[1] Head Start

[1] In this resource, data are considered linked when information from two or more separate data systems or databases are shared, connected, combined, or merged. These data systems or databases may be housed in the same program or in multiple programs or agencies. Linking can occur in various ways ranging from simple, (e.g., sharing a spreadsheet) to more complex (e.g., merging two databases into a single file), to very complex (e.g., fully integrating data across multiple agencies). However, all linked data has the potential to provide useful information to support ECE program improvement.

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Publication # 2016-31

data with external organizations, Ms. Chao knows that the program will first need to decide if they should participate. If so, then someone also needs to determine what data should be linked and how to protect the privacy of the data the program shares.

Ms. Chao wants to pull together a group of representatives from each of the Head Start sites to think about how to respond to the request from the city and address other data-related issues. She hopes this group will be able to help respond to any data sharing requests in the future. Additionally, Ms. Chao hopes that someone from this group will join the city-wide data governance group in order to represent the needs of the Head Start grantee. She has never received a request to share data with an external organization, though, and she is not sure how to develop this decision-making group.

Summary of Action Steps

1. Determine the purpose of the data governance entity.
2. Determine how to incorporate the data governance entity into existing structures.
3. Identify individuals to participate in the data governance entity.
4. Define the roles and responsibilities of data governance members.
5. Develop decision-making procedures.
6. Document all policies and procedures.
7. Make decisions about data use and linking.
8. Monitor data use and linking projects.

Action Steps

The group that Ms. Chao is interested in forming to help consider a range of issues related to the Head Start grantee's use of data is often called a *data governance entity*. Program staff can structure data governance entities in a variety of ways to meet the needs of the program. Some data governance entities might only need a small group involved to manage the data, while other data governance groups may consist of a large number of individuals who sit on subcommittees dedicated to managing a particular topic or request. Ms. Chao wants to create a data governance entity that will determine whether and how to participate in this data sharing partnership and other city-wide data efforts going forward, as well as how to manage data internally. Ms. Chao can take a few steps, described below, to set up a data governance entity that best fits the grantee's needs. It should be noted, however, that a data governance entity can look different depending on the context of the participating programs, so the steps below should be adapted as needed.

1. Determine the purpose of the data governance entity.

Before Ms. Chao establishes a data governance entity, she will want to determine the purpose of the group. One main purpose will be to review each data-sharing request and determine whether to approve them. The data governance entity, for example, may accept the city's request to link their Head Start data into the city-level data system because they believe it will benefit the children and families they serve and are confident in the city's ability to protect the privacy of the data. They may decline the request, though, if they are not sure of the benefit to their program or the families they serve, or if they cannot come to an agreement with the other city organizations about how the data will be used or stored.

A second purpose of Ms. Chao's group is to review and develop data policies and guidelines for the multiple Head Start sites. For instance, teachers in some sites might enter data weekly, whereas teachers in other sites may enter data monthly. The data governance entity could create guidelines for how to maintain data quality when collecting the same information in two different ways. The data governance entity could also ensure that policies for how to collect, store, and analyze data are consistent across sites. More details about the policies and guidelines are provided in the text box.

Data Policies and Guidelines

While the specific roles and responsibilities of a data governance entity can differ depending on the purpose and needs of the organization, they will typically include the development and review of policies and guidelines about data management and data processes:

1. *Data use policy* includes documentation of decisions about data use and includes things like describing the conditions for granting or denying a request to share data and guidelines for the types of data that could be shared. For instance, with any given data request, it is not usually necessary for a program to share or link all of their data; rather, a program should share only what data are necessary for the intended purpose of the request. The data governance entity can help determine what data are appropriate and necessary to share or link for each request. Additionally, if an outside organization requesting data access does not have the infrastructure to ensure the security of the data, the data governance group may decide to reject the organization's request until they can clearly articulate how they will keep the data secure. Clear policies that describe the circumstances in which data can be shared will help guide the decision making of the data governance entity.

2. *Data management policies* focus on the procedures for collecting and using data. These policies should emphasize how to ensure and maintain the quality of data, such as procedures to ensure the collection of high-quality data and protocols for reviewing the accuracy and clarity of data used or reported. Additionally, these policies should outline guidelines for how long data should be maintained and procedures for destroying data files when they are no longer needed for their intended purpose.

3. *Data security* addresses technology and information technology (IT) services to secure data and protect confidential information. The data governance entity should specify the appropriate ways that data can be transferred to a partner organization (e.g., a password-protected Excel spreadsheet sent by email, through a secure online portal, or in-person on a USB). The data governance group may also want to define the ways that data will be stored within their organization and outside of their organization (e.g., locked filing cabinets or on a secure network). For more information about establishing data security policies, see the Data Security Checklist by the Privacy Technical Assistance Center (PTAC).

2. Determine how to incorporate the data governance entity into existing structures.

After Ms. Chao outlines the purpose(s) of the data governance entity, she will next want to consider whether or not she can incorporate the data governance tasks into an existing committee or council, or if they will need to create a new group. Head Start grantees and some child care programs have a leadership board that helps make decisions for the program. For example, Head Start programs currently have a governing body, a policy council, and management staff that make various program recommendations and decisions.[2] Many of the responsibilities of the data governance entity may overlap with the work of a current group. If current councils or committees already discuss some data governance topics, Ms. Chao may want to simply expand their responsibilities. For instance, one function of the Head Start governing body is to determine program procedures for accessing and collecting information from families.[2] If the governing body does not currently discuss data governance, Ms. Chao could recommend to the Head Start grantee director that this be included as a part of their official responsibilities, including making decisions about linking data with outside entities. If the current groups do not seem appropriate for or do not have the time to address data governance issues, then Ms. Chao may recommend the creation of a new group solely dedicated to data governance.

If Ms. Chao and the Head Start director decide that a new data governance entity is needed, they will likely want to consult with and gain approval from their Head Start governing body and/or policy council before moving forward, as well as keeping them informed and seeking their feedback throughout the process. It is important that the data governance entity work closely with the program's governing body and/or policy council to ensure that they are following all of the necessary

[2] See the Head Start Governance and Management Responsibilities chart for an overview of these three existing structures: http://eclkc.ohs.acf.hhs.gov/hslc/tta-system/operations/certification/governance-entities-diagram.pdf.

program policies. Some leadership bodies may decide to hand over all decision-making related to data to the data governance entity. Others may decide that the best way to coordinate would be to have the data governance entity propose recommendations to the program's leadership board, with the ultimate approval coming from the leadership board.

3. Identify individuals to participate in the data governance entity.

If Ms. Chao decides to create a new group, she will want to identify the types of individuals who can fulfill the roles for data governance decision-making. Existing councils and committees might already have some of these stakeholders represented. The data governance entity should reflect a variety of stakeholders (see the box below, *Examples of stakeholders to consider including in a data governance entity*). For example, to ensure that each of the eight sites overseen by the grantee participates in the decision making process about how their data will be used or linked, the data governance entity should include people who are knowledgeable about each site (e.g., include one person from each site or staff members who work with multiple sites). Ms. Chao should also consider inviting parents of children in the Head Start program to join the group so that families' perspectives are considered when making decisions about data. By having different voices at the table, Ms. Chao can ensure that multiple views will be considered.

Examples of stakeholders to consider including in a data governance entity:

- **Governing board or policy council member:** A board or policy council member may have a broader community perspective and understand how data might be useful for policy and program decisions.
- **Center/Program director:** The director will know the specific needs of the program and its staff.
- **Parents:** Parents or family members of an enrolled child can offer information about how a family may feel about how data are used or shared with external organizations.
- **Teacher:** A teacher may be able to offer information about how data are collected and used in a classroom.
- **IT manager:** Data cannot be linked if processes are not set up to facilitate linking. An IT manager can provide insight into how the data systems can "talk" with one another.
- **Data manager/Data analysis expert:** Those who work directly with data can provide information about what the data mean and how the data might be used.

4. Define the roles and responsibilities of data governance members.

Ms. Chao will need to define the roles and responsibilities of those who will participate in the data governance entity. Some members may want to be involved more or less than others, so Ms. Chao can clarify their preferred level of involvement and their preferred role. For instance, Ms. Chao will need at least one individual to be in charge of ensuring that the data governance entity functions well (e.g., the chairperson). That individual can initiate and lead meetings, ensure that policies are upheld, and facilitate discussions. Ms. Chao or the Head Start director may be well-suited for this role. In addition, Ms. Chao may want to ask people with particular data expertise to lead the group's work in each of the three areas of data governance (i.e., data policy, data management, and data security).

5. Develop decision-making procedures.

Depending on how Ms. Chao structures the data governance entity, she may need to facilitate a discussion among the data governance members about how they will make decisions about data use and linking. Here are some questions that could be used to guide the discussion:

- Will they make decisions by consensus or majority vote? How many members must be present to make decisions? Will they need to consult or coordinate with a program governing body?

- Can a few key individuals (e.g., Head Start director and Ms. Chao) make certain kinds of decisions without bringing the issue to the full data governance group? If so, what decisions can they make?
- How often will the data governance entity meet?
- How will new members be chosen?
- How will community stakeholders be kept informed?
- How will the group engage parents in decisions about data use and sharing?

There is no one right way to structure decision-making procedures, but it is important for everyone on the data governance council to agree on the decision-making procedures.

Additional resources about data governance:

- Data governance checklist: A checklist for data governance entities to help create and sustain a successful data governance entity.
- Data governance and stewardship: Guidance on how to manage data systems through a data governance entity.

Additional resources about leadership and decision-making procedures:

- Head Start Program Governance Training modules: Online training modules with activities and scenarios to help develop governance leadership skills for governing bodies, Tribal Councils, and Policy Councils. Section 4 of the training modules focuses on making meaningful decisions. The text version of this training can be viewed here: Head Start Program Governance Training: Building Skills of Head Start Leaders Text Version

6. Document all policies and procedures.

Any policy or procedure related to data governance should be well-documented and shared with staff across all the sites to help ensure that they are followed. For instance, a data governance handbook or guide can describe how the data governance entity is structured, the roles and responsibilities of the members, how decisions will be made, and any other relevant information about how the data governance entity will function. The data governance group can develop a data guide or add information to existing manuals or handbooks that describes recommended procedures for data collection and management, as well as necessary training and professional development for staff. Written policies can help ensure that data are used, stored and shared appropriately and consistently across the eight sites.

7. Make decisions about data use and linking.

Now that Ms. Chao has formed the data governance entity, the data governance members will need to make decisions about data use and linking. One of the first decisions they will likely make is whether to accept the invitation from the city to link their data into the city-wide early childhood data system. In considering this and other requests, the data governance entity will want to ask questions such as:

- What is the ultimate purpose for using or linking the data?
- What is the benefit of using or linking the data? Does it benefit our program and/or families?
- How will the data be used or linked?
- Does this use or linking of the data require a re-examination of current procedures for gaining parental consent? Have parents already given permission for data to be shared?
- If data are shared with another organization to link, how will the data be stored by the other organization? Will it be secure? When and how will the data be destroyed?

- How will the results of any analyses be reported?
- Are there other factors to consider before approving or denying a particular data sharing request?

8. Monitor the implementation of data use policies and procedures, including specific data linking projects.

In this example, if the data governance entity approved the city's data request, they will likely develop a data sharing agreement with the city as a next step and will have regular meetings with the city to discuss progress or issues. At least one person from the internal data governance team will likely join the city-level data governance entity to represent the perspective of their Head Start program and the children and families they serve, and be able to monitor how their data are being used and linked with other city data. In addition, the data governance entity will want to ensure that other policies and procedures regarding data use, developed under the steps above, are implemented and followed by the program. For instance, if the data governance group outlined recommendations or requirements for staff training related to data management and use, the group will want to ensure that such training opportunities are made available for staff in a timely manner.

Summary

In summary, program directors or data managers like Ms. Chao can adapt the ideas in this document to best fit their needs in order to establish a successful and effective data governance entity. Data governance is important because early care and education programs collect a variety of data on children and families, and it is necessary to have a group that oversees the use and management of these data. A data governance entity helps make decisions about how data can be kept secure and confidential, and helps ensure that data are collected, entered, and reported in a high-quality manner. In addition, data governance entities can establish the policies and procedures around how data should be stored, managed, and used, as well as how data can be shared or linked with data from other organizations. While there is no single best way to establish a data governance entity, these action steps provide initial ideas about how to organize a group of individuals who can make decisions about using and linking data.

Acknowledgments

Child Trends is grateful for the financial support of the *Building Capacity to Use Linked Early Childhood Administrative Data* project, provided by the Office of the Assistant Secretary for Planning and Evaluation, in partnership with the Office of Planning, Research and Evaluation, in the U.S. Department of Health and Human Services. The goal of the project is to help early care and education programs build their capacity to link and use linked administrative data for program improvement and research purposes.

We would like to thank the federal staff who provided importance guidance throughout this project: Lindsey Hutchison and Kimberly Burgess, Office of the Assistant Secretary for Planning and Evaluation; Christine Fortunato, Office of Planning, Research and Evaluation; and Theresa Rowley, Office of Head Start.

We also appreciate the contributions of the project's expert panel, whose members dedicated time and provided advice to strengthen the resources developed as part of this project. Expert panel members include: Leigh Bolick, South Carolina Department of Social Services; Craig Detweiller, Georgia Department of Early Care and Learning; Emmalie Dropkin, National Head Start Association; John Fantuzzo, Penn Child Research Center, University of Pennsylvania; Vanessa Rich, Chicago Department of Family and Support Services; and Amanda Schwartz, National Center on Health, Amanda Schwartz Consulting.

We extend a special thank you to the early care and education program staff who provided examples of using linked data, explained the opportunities and challenges in linking data, described how they linked data and how it helped inform continuous quality improvement, and talked with us about their programs' data practices.

Suggested citation: Lin, V. K., Epstein, D., & Maxwell, K. L. (2016). *Data direction 1: Creating and managing a data governance entity*. Report #2016-31. Bethesda, MD: Child Trends.

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