

## **P20 WIN Data Governance Policy**

A policy to establish  
a vision for interagency data sharing  
and the process and structure for data governance as it  
pertains to Connecticut's Preschool through 20 &  
Workforce Information Network  
- P20 WIN -

Prepared by,  
P20 WIN Data Governance Committee  
Published: October, 2014  
Version 2.0

**Definitions:** for the purpose of this policy, the following definitions shall apply:

- A. **Data Definitions** are the plain language descriptions of data elements. The definitions should be specific enough to allow users to fully understand the data elements.
- B. A **Data Dictionary** is a listing of the names of a set of data elements, their definitions and additional meta-data. A data dictionary does not contain any actual data rather it serves to provide information about the data in the data set.
- C. **Data Elements** are units of information as they are stored or accessed in any data system. For example, data elements about a student's academic history could include: student ID number, course code, credits attempted, cumulative grade point average, et cetera.
- D. **Meta-Data** refers to the information about a data element that provides context for a data element such as its definition, storage location, format and size.
- E. **Participating Agencies:** The Participating Agencies are the Connecticut Board of Regents for Higher Education (BOR), the Connecticut State Board of Education, the Connecticut Department of Labor and those entities that have executed a similar Memorandum of Agreement for participation in P20 WIN and that have been approved for participation by all Participating Agencies.
- F. **"Preschool through Twenty and Workforce Information Network"** or "P20 WIN" is a federated data system for the purpose of matching and linking longitudinally data of state agencies and other organizations for the purpose of conducting audits and evaluations of Federal- and State-supported education programs.
- G. **P20W** refers to prekindergarten, including early childhood, Kindergarten through twelfth grade (K12), postsecondary education, advanced and lifelong learning, and the workforce.
- H. **Data Request Management:** The required review process for each Data Request posed to the system. The Data Request Management process is set forth in the P20 WIN Data Request Management Procedure. Notwithstanding to the contrary in said Procedure, in all cases no data will be included in the data match for any given Participating Agency unless the given Participating Agency has approved the inclusion of its data and has approved the individual(s) or entities who have authority to access to the resulting data set.

## **Vision**

Connecticut's Preschool through Twenty and Workforce Information Network (P20 WIN) informs sound educational policies and effective educational program practices through the secure sharing of critical longitudinal data across the Participating Agencies to ensure that individuals successfully navigate educational pathways into the workforce.

## **Rationale**

Answering policy questions to support improvements in state and local educational practices often requires linking information from multiple agencies. A data sharing system that connects data across agencies and also supports a broad policy agenda requires a governance structure that will support and maintain data sharing efforts securely and systematically. It is critical to have policies and procedures in



place to ensure data quality, data security, data confidentiality, the protection of individual privacy and system sustainability. Without this structure in place to oversee and support ongoing management, maintenance and enhancement of cross-agency data sharing, the opportunity to collaborate is limited.

## **Policy Statement**

This policy establishes the processes and structures governing any and all data sharing between the Participating Agencies through P20 WIN. P20 WIN is to be a mechanism through which Participating Agencies obtain longitudinal data that crosses agency borders in order to better understand Connecticut's educational programs and outcomes and their relationships to employment programs and outcomes. This policy governing data sharing is intended to provide the standards necessary to ensure the proper management and security of any and all data shared through P20 WIN. This policy, establishes a strategic framework to guide Participating Agencies' decision making regarding data sharing. This governance policy:

1. Establishes the P20 WIN Data Governance Executive Board, Data Governing Board and Data Steward Committee as the cross-agency bodies that will establish and implement data governance policies within and across agencies in accord with applicable federal and state law and the authority of each of the Participating Agencies.
2. Provides that the P20 WIN Data Governance Executive Board will set the strategic direction for P20 WIN and that its members will take appropriate steps to secure the necessary resources to support system implementation and improvement.
3. Provides for the P20 WIN Data Governing Board to establish in accordance with applicable law and their members' statutory authority additional detailed interagency standards and processes for the (a) communication about, and (b) definition, integration, storage, access, and reporting of data to improve quality, utility, and protection of shared data.
4. Provides for the P20 WIN Data Steward Committee to implement components of the system at the agency level as authorized by the Board member for such agency and carry out policies approved by the Data Governing Board.
5. Designates Participating Agencies as stewards to P20 WIN in that each agency is responsible for lending subject matter and technical expertise to the governance process. While agencies maintain control and ownership over their own data, their participation in P20 WIN requires participating in shared governance of the overall system.
6. Establishes overarching standards for the management and security of the data system.  
  
Defines the Participating Agencies' responsibility to manage and use data in support of their missions in accord with applicable law.

## **Scope**

This P20 WIN data governance policy applies to the data that is shared by Participating Agencies through the P20 WIN. As of the date of this agreement, the Participating Agencies are the Connecticut State Department of Education (SDE), the Connecticut Board of Regents for Higher Education (BOR), the Connecticut Department of Labor (DOL), and the Connecticut Independent College and University Institute for Research and Public Service, Inc. (Cicu-IRPS).

Each Participating Agency is responsible for the data that reside in their respective systems. This policy covers only the data that is shared between Participating Agencies through P20 WIN both at the unit and aggregate level. While data will be transported, matched and eventually stored electronically, this policy



covers the use of shared data at all stages, including but not limited to data used in reports and documents whether electronic or in print.

All decisions pertaining to the use of public funds or resources will be made only by representatives from Participating Agencies which are also state agencies. This requirement shall apply to all boards and committees described herein.

## **Governance Roles and Responsibilities**

A cross-agency data governance system provides the structure through which agency representatives can create and implement the necessary policies and procedures for a multi-agency data sharing system to address broad policy questions and state needs. To achieve this goal, there shall be an Executive Board, Data Governing Board and Data Steward Committee whose tasks are set forth herein. Together these three groups shall provide system leadership, policy creation and system implementation, maintenance and improvement. All decisions of the Executive Board and Data Governing Board must be made by unanimous vote of their members except that any Participating Agency which is not a state agency shall be disqualified from participating in decisions pertaining to the use of public funds or resources.

### **The Executive Board**

The Executive Board is a multi-agency committee that shall provide vision, oversight and leadership for the data governance structure. The Executive Board shall consist of the chief executive officer (e.g., Commissioner or President), or his/her designee, of each Participating Agency. The Executive Board shall have ultimate decision making authority for P20 WIN and each member has the power to hold staff within their respective agencies accountable to the goals of the system. Executive Board Members affirm that the work of P20 WIN adds value to their agencies and to Connecticut as a whole and therefore will work to continue to secure resources for its operation.

### **Responsibilities**

- Advance a vision for P20 WIN including a prioritized research agenda with support from the Data Governing Board and the P20 Council in accord with applicable federal and state law and the authority of each of the Participating Agencies.
- Each Member shall identify representatives from its respective agency to serve on the Data Governing Board.
- Convene to respond to escalated issues from Data Governing Board.
- Identify and work to secure resources necessary to sustain P20 WIN beyond the initial grant funding.
- Champion system implementation, maintenance and improvement by advocating for P20 WIN in regard to policy, legislation and resources.
- Members of this group not only represent the interest of their agency but, consistent with applicable law and their agency's authority, work to support the state's vision for P20 WIN.
- Have overall fiscal and policy responsibility for the system.
- Ensure that in any circumstances in which public funds or resources are to be jointly utilized with those from private entities such arrangements are governed by appropriate agreements approved by the Attorney General



## **The Data Governing Board**

The Data Governing Board establishes and enforces policies related to cross-agency data management including but not limited to data confidentiality and security in alignment with the vision for P20 WIN and applicable law. It is a committee consisting of one staff member from each Participating Agency who has responsibility to recommend policy and the authority to commit resources to support their agency's participation in P20 WIN. Members work collaboratively to develop policies necessary for the implementation, maintenance, security and improvement of P20 WIN. Once policies and resource commitments are approved, the Data Governing Board members are responsible for implementing and enforcing these policies.

### **Responsibilities**

- Identify P20W policy questions aligned with the research agenda as established by the Executive Board.
- Establish data governance policies, including a Data Governance Manual, to enable, improve and sustain P20 WIN. All policies and actions of the Data Governing Board shall be consistent with the Memoranda of Agreement entered into by the Participating Agency and the Department of Labor, and the P20WIN Data Request Management Procedure.
- Provide in accord with applicable law and the Memoranda of Agreement entered into between the Participating Agency and the Department of Labor, and the P20WIN Data Request Management Procedure the most appropriate data from their respective agency source systems to support the accurate and effective implementation of P20 WIN.
- Review and approve requests for data, data output and resulting publications prior to release in accord with applicable law and the Memoranda of Agreement entered into between the Participating Agency and the Department of Labor, and the P20WIN Data Request Management Procedure.
- Specify and produce guidelines for reports that P20 WIN might produce on a regular basis.
- Identify data stewards/managers to participate in Data Steward Committee and address escalated issues and questions as generated by the Data Steward Committee and other stakeholders.
- Establish a protocol for expanding the data system to include additional agencies or data. The protocol shall require approval of the Executive Board.
- Members of this group not only represent the interest of their agency but consistent with applicable law and their agency's authority, work to support the state's vision P20 WIN.

## **The Data Steward Committee**

The Data Steward Committee develops recommendations and provides oversight for the technical implementation of the P20 WIN data system and is responsible for the availability, security and quality of data shared through P20 WIN. Members from each agency shall serve on the committee consisting of two subject matter experts: a primary data user, such as an institutional researcher, and a primary information technology person. The Data Steward Committee recommends to the Data Governing Board policies or practices that need to be developed or improved and is then responsible for implementing the processes necessary to carry out the approved data system policies.

### **Responsibilities**

- Implement policies and processes as approved by Data Governing Board.
- Define data standards and data cleansing processes.



- Develop, document and monitor data definitions and meta-data for shared data elements.
- Evaluate the quality of the technical process for matching data and the quality of the data available through the system.
- Make recommendations to the Data Governing Board on policies and procedures that need to be created or improved including but not limited to policies and procedures to ensure data security.
- Members of this group not only represent the interest of their agency but consistent with applicable law and their agency's authority, work to support the state's vision for P20 WIN.

## Processes

Together the P20 WIN data governing bodies work in concert to ensure that the following processes operate smoothly.

- Response to data requests  
Requests for data from P20 WIN are directed through the Data Governing Board which establishes processes for managing individual data requests from the point of application through the production of reports or documents that use data from the resulting matched data set. This process is governed by the P20 WIN Data Request Management Procedure document.
- Determination of authorized users and access rights to resultant data sets.  
In accord with applicable law and the Memoranda of Agreement entered into by the Participating Agency and the Department of Labor, and the P20WIN Data Request Management Procedure, the Data Governing Board (i) approves the users who are to have access to de-identified unit record data from P20 WIN and (ii) establishes the parameters for data dissemination and destruction.
- Development and maintenance of cross-agency data dictionary  
The Data Steward Committee is responsible for ensuring that the data dictionary for each Participating Agency is complete and up-to-date.
- Establishment of guidelines for data analysis as necessary  
The Data Governing Board establishes processes that support a common approach to data analysis for resultant data sets as appropriate.
- Expansion of P20 WIN  
The Executive Board approves a protocol for expanding the data system to include additional agencies or state organizations or additional data so that the technical infrastructure is expanded and new agencies have representation in the named committees. Such additions shall require unanimous consent of the Participating Agencies and only occur after consultation with the Office of the Attorney General.
- Establishment of policies to sustain P20 WIN  
The Executive Board establishes agreement and policies to sustain and improve P20 WIN including how P20 WIN will be staffed and supported financially after the term of the grant.
- Modification of this policy  
The Data Governing Board can make recommendations to modify this policy to the Executive Board.



## Program Support

To allow for smooth continuation of system development and to support the work of the Executive Board, the Data Governing Board and the Data Steward Committee past the initial grant phase, the functions of financial and program management will be provided by staff from the BOR with oversight from the Executive Board for a period of six months after the end of the grant period. Upon review by the Data Governing Board, this term of service may, with consent of the BOR, be extended in increments of six months. This support function may be replaced by a different administrative model as approved by all members of the Executive Board.

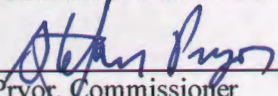
## Duration

This policy shall be in effect from the date of the last signature and shall remain in effect until revised or terminated. If the Participating Agencies change, an amendment expressing the change shall be signed by the new Executive Board members.

## Commitment

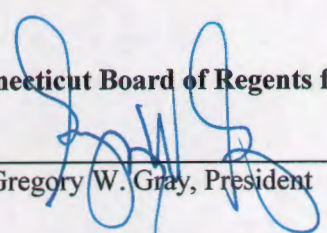
As members of the P20 WIN Data Governance Executive Board, we affirm the vision and policy set forth in this document.

### Connecticut State Board of Education

  
\_\_\_\_\_  
Stefan Pryor, Commissioner

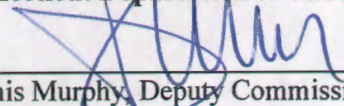
11/5/14  
Date

### Connecticut Board of Regents for Higher Education

  
\_\_\_\_\_  
Dr. Gregory W. Gray, President

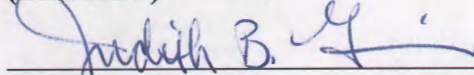
10/17/14  
Date

### Connecticut Department of Labor

  
\_\_\_\_\_  
Dennis Murphy, Deputy Commissioner

1/20/15  
Date

### Connecticut Independent College and University for Research and Public Service, Inc. (Cicu-IRPS)

  
\_\_\_\_\_  
Judith Greiman, President

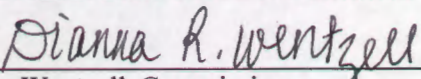
11/14/14  
Date

## Renewed Commitment

This addendum to the P20 WIN Data Governance Policy, Appendix D to the P20 WIN MOAs, demonstrates unanimous agreement to include the University of Connecticut as a Participating Agency in the Preschool through Twenty and Workforce Information Network (P20 WIN)

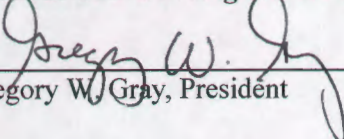
As members of the P20 WIN Data Governance Executive Board, we affirm the vision and policy set forth in this document.

### Connecticut State Board of Education

  
Diana Wentzell, Commissioner

5/27/15  
Date

### Connecticut Board of Regents for Higher Education

  
Dr. Gregory W. Gray, President

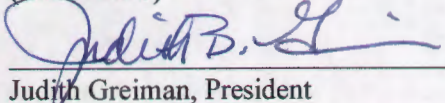
5/27/15  
Date

### Connecticut Department of Labor

  
Dennis Murphy, Deputy Commissioner

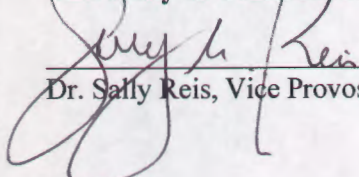
5/27/15  
Date

### Connecticut Independent College and University for Research and Public Service, Inc. (Cicu-IRPS)

  
Judith Greiman, President

5/27/15  
Date

### University of Connecticut

  
Dr. Sally Reis, Vice Provost for Academic Affairs

5/27/15  
Date