

First Amendment P20 WIN Data Governance Policy

This Amendment to the P20 WIN Data Governance Policy is made by and among the Connecticut State Board of Education, Connecticut State Colleges and Universities, the Connecticut Department of Labor, The CT Independent College and University for Research and Public Service, Inc., the University of Connecticut, the Office of Early Childhood and the Office of Policy and Management.

WHEREAS, the P20 WIN Data Governance Policy (“Policy”) was approved by the undersigned and last dated May 27, 2015;

WHEREAS, the undersigned desire to amend the Policy in accordance with the terms set forth in this Amendment; and,

WHEREAS, the undersigned agree that references made to the Policy in any and all active Memoranda of Agreement to which any of the undersigned are a party, shall mean the Policy as amended herein.

NOWHEREFORE, the undersigned agree as follows:

1. The paragraph entitled “Definitions” is hereby deleted in its entirety and replaced with the following language:

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

- A. **Data Definitions** shall have the same meaning as prescribed in Public Act 17-207.
- B. **Data Dictionary** shall have the same meaning as prescribed in Public Act 17-207.
- C. **Data Elements** shall have the same meaning as prescribed in Public Act 17-207.
- D. **Meta-Data** shall have the same meaning as prescribed in Public Act 17-207.
- E. **Participating Agencies** shall have the same meaning as prescribed in Public Act 17-207.
- F. **Preschool through Twenty and Workforce Information Network or P20 WIN** shall have the same meaning as prescribed in Public Act 17-207.
- G. **P20 WIN** shall have the same meaning as prescribed in Public Act 17-207.
- H. **Data Request Management** shall mean 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.”

2. The following provisions are hereby inserted into the Policy after the paragraph entitled “Processes”:

Administrative Lead Agency (ALA)

One of the Participating Agencies will be selected by the P20 WIN Executive Board to serve as the Administrative Lead Agency to facilitate smooth and efficient operation of P20 WIN for the benefit of the Participating Agencies and the greater benefit of the State of Connecticut.

Responsibilities of the ALA include, but are not limited to the following:

Responsibilities

- In collaboration with the Participating Agencies, develop a budget for each biennial budget term to support costs across all Participating Agencies associated with ongoing operation, maintenance and improvement of P20 WIN.
- Submit a budget request that includes funding for P20 WIN to the legislature and facilitate its approval.
- In collaboration with Participating Agencies, develop memoranda of agreement or contracts as necessary to distribute funds allocated by the legislature for P20 WIN to the Participating Agencies as defined in the approved budget.
- Provide financial back-office support for managing the receipt and distribution of funds according to fully executed P20 WIN agreements.
- Provide Program Management to support the continued operation, maintenance and improvement of P20 WIN as a resource for the Participating Agencies and the State.
- Provide for meeting space and materials as needed.
- Coordinate and prepare reports on P20 WIN activities and outcomes for legislative and funding stakeholders.

Data Matching Agency (DMA)

An agency will be selected by the P20 WIN Executive Board to serve as the Data Matching Agency to provide data matching services for approved data requests. The specific responsibilities of this role are defined in the MOA that exist between the Data Matching Agency and each Participating Agency. General responsibilities of the DOL include, but are not limited to the following:

Responsibilities

- Conduct data matches for approved P20 WIN ~~approved~~ data requests.
- Work with representatives from the Participating Agencies whose data is included in an approved data request to produce a matching data set with the highest possible match rate.
- Respond to requests for data matches in a timely fashion.
- Provide a matrix of data record groups and generic identifiers to Authorized Representatives for approved data requests.
- Document the receipt and destruction of data files as they are received and destroyed according to relevant data sharing agreements.

Participating Agencies

The support and involvement of the Participating Agencies are central to ongoing operation of P20 WIN. The Participating Agencies must continue to participate in the P20 WIN system and support the P20 WIN Data Governance policy to ensure ongoing collaboration around data access and data use for the benefit of the Participating Agencies and the State as a whole.

Responsibilities of the Participating Agencies include, but are not limited to the following:

Responsibilities

- Provide staff resources to participate in P20 WIN data governance committee meetings including regularly scheduled and ad-hoc Executive Board, Data Governing Board and Data Steward Committee meetings.
- Maintain and upgrade as necessary analytical software that enables the Participating Agency to conduct high quality data analysis.
- Maintain and upgrade as necessary system hardware and software to ensure the quality, security and availability of source data so that approved data requests, with completed data sharing agreements, can be fulfilled.
- Engage agency staff, in addition to those designated as representatives to data governance committees, as necessary to support the completion and success of P20 WIN activities.
- Help the Administrative Lead Agency prepare activity reports and funding requests to the legislature if necessary.

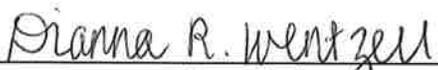
Program Support

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, the functions of financial and program management will be provided by staff from the Connecticut State Colleges and Universities (CSCU) with oversight from the Executive Board, and the role of Data Matching Agency will be provided by staff from the Connecticut Department of Labor.

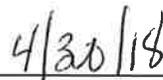
Duration

This policy shall be in effect from the date of the final signature and shall remain in effect for a period of five years unless revised or terminated.

Connecticut State Board of Education



Dianna Wentzell, Commissioner



Date

Connecticut State Colleges and Universities

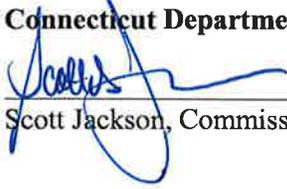


Mark Ojakian, President



Date

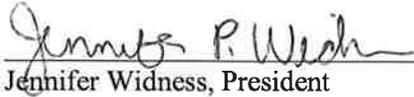
Connecticut Department of Labor



Scott Jackson, Commissioner

5/23/18
Date

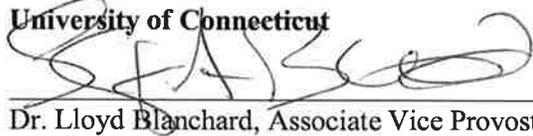
CT Independent College and University for Research and Public Service, Inc. (Cicu-IRPS)



Jennifer Widness, President

4-20-18
Date

University of Connecticut



Dr. Lloyd Blanchard, Associate Vice Provost

4-~~20~~-18
Date

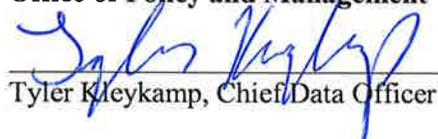
Office of Early Childhood



David Wilkinson, Commissioner

4/25/18
Date

Office of Policy and Management



Tyler Kleykamp, Chief Data Officer

5/25/18
Date

P20 WIN Data Governance Policy

As amended May 2018

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: May, 2018
Version 3.0

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

- A. **“Data definitions”** mean the plain language descriptions of data elements.
- B. **“Data dictionary”** means a listing of the names of a set of data elements, their definitions and additional meta-data that does not contain any actual data, but provides information about the data in a data set..
- C. **“Data elements”** mean units of information that are stored or accessed in any data system, such as a student identification number, course code or cumulative grade point average.
- D. **“Meta-data”** means the information about a data element that provides context for that data element, such as its definition, storage location, format and size.
- E. **“Participating agency”** means the Connecticut State Colleges and Universities, Department of Education, Labor Department, The Office of Early Childhood. The University of Connecticut, the Connecticut Conference of Independent Colleges or any entity that has executed a memorandum of agreement for participation in the CP20 WIN and has been approved for participation by all other participating agencies..
- F. **“Preschool through Twenty and Workforce Information Network”** or “P20 WIN” means a state 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 education programs.
- G. **“P20 WIN”** means a state 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 education programs.
- H. **“Data Request Management”** shall mean the required review process for each data request posted 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 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.

Administrative Lead Agency (ALA)

One of the Participating Agencies will be selected by the P20 WIN Executive Board to serve as the Administrative Lead Agency to facilitate smooth and efficient operation of P20 WIN for the benefit of the Participating Agencies and the greater benefit of the State of Connecticut. Responsibilities of the ALA include, but are not limited to the following:

Responsibilities

- In collaboration with the Participating Agencies, develop a budget for each biennial budget term to support costs across all Participating Agencies associated with ongoing operation, maintenance and improvement of P20 WIN.
- Submit a budget request that includes funding for P20 WIN to the legislature and facilitate its approval.
- In collaboration with Participating Agencies, develop memoranda of agreement or contracts as necessary to distribute funds allocated by the legislature for P20 WIN to the Participating Agencies as defined in the approved budget.
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of the Participating Agencies and the State as a whole. Responsibilities of the Participating Agencies include, but are not limited to the following:

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- Engage agency staff, in addition to those designated as representatives to data governance committees, as necessary to support the completion and success of P20 WIN activities.
- Help the Administrative Lead Agency prepare activity reports and funding requests to the legislature if necessary.

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, the functions of financial and program management will be provided by staff from the Connecticut State Colleges and Universities (CSCU) with oversight from the Executive Board, and the role of Data Matching Agency will be provided by staff from the Connecticut Department of Labor.

Duration

This policy shall be in effect from the date of the final signature and shall remain in effect for a period of five years unless revised or terminated.

Commitment

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

Please note, the signatures and dates of commitment are on the amendment to the original policy.