Hawaiʻi Data eXchange Partnership

Data Governance Policy

April 20, 2018

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Purpose

The Hawai'i Data eXchange Partnership ("DXP," formerly known as the P20W Statewide Longitudinal Data System) is Hawai'i's longitudinal education-to-workforce data system. DXP's Executive Committee recognizes that the development of a statewide, coordinated data governance policy and associated processes are critical to supporting the demand for high-quality educational and workforce data. The purpose of this statewide, cross-sector data governance is to enable the sharing of data to support research and evaluation that will improve the educational and workforce outcomes for the citizens of Hawai'i. The Data Governance and Access Committee ("DG&A," formerly known as the Steering Committee) has been established by the Executive Committee and functions as the overall coordinating Committee to facilitate the development of data sharing and access policies. DG&A has also delineated the roles and responsibilities for three key areas of data governance, which will be overseen by sub-committees of the same name: 1) Research and Data Request Sub-committee (RDR); 2) Security and Access Sub-committee; and 3) Data Quality Sub-committee.

A foundational premise of DXP is that individual privacy interests and confidentiality rights apply to all shared data. To avoid the inappropriate use of data, the Partners agree to share data in a manner that safeguards the confidentiality of data as provided by the federal Family Educational Rights and Privacy Act ("FERPA"), Hawai'i Revised Statutes ("HRS"), Hawai'i Administrative Rules ("HAR"), Partner internal policies, and other applicable laws and regulations. The Partners agree that the data will be used for educational and workforce research and that unit-level datasets will be de-identified or reported in aggregate format.

Underlying Assumptions of the Three- and Five-partner Memoranda of Understanding

The following assumptions make up the foundation of data sharing for each Partner committed to the establishment and sustainability of DXP:

1. DXP is a de-identified, merged database that is owned by the Partnership as a whole.
2. Access, use, and reporting of data from DXP are subject to DXP policies, procedures, and processes.
3. Data from DXP is to be used for research, evaluation, and audit purposes to improve the educational and workforce outcomes that benefit the citizens of Hawai'i. DXP only considers requests that are made by Federal or State entities, or private entities with a mission to improve educational or workforce outcomes.
4. DXP is a "pipeline" or "cross-sector" longitudinal data system. Requests for data and/or reports using data from DXP will be primarily for cross-sector data.
   a. Cross-sector data requests will be prioritized over within-sector data requests and subject to DXP approval based on workload demands, as well as DG&A approval.
   b. Within-sector data requests:
      i. Will be considered on a case-by-case basis;

          ii.   Must be approved or requested by the data owner; and

          iii.   Are subject to approval based on the workload of DXP staff.

5. Approved requests will result in data output from DXP in two basic formats:
    a. Aggregate reporting with appropriate masking of data for small cell sizes; or
    b. De-identified, unit-level data.
6. Each Partner has data to contribute to DXP, and that sector-based data has its own unique complexities.
7. Pursuant to HRS subsection 27-7(c) as enacted by Act 41, Session Laws of Hawai'i 2010, and the Three- and Five-partner Memoranda of Understanding (MOU), DG&A and associated sub-committees will be established with Partner and/or Affiliate representation.
8. Policies, processes, and procedures will be developed by the appropriate DG&A sub-committees, to provide guidance on access to and use of data from DXP.
9. The Operational Data Store (ODS) contains personally identifiable information (PII) which is used *only* for matching data from within and across sectors to the correct individual.
    a. Redaction of PII prior to any release of data is necessary to comply with the conditions and agreements set forth in the Three- and Five-partner MOUs and is the basis for the data models underlying DXP.
10. Data from the ODS is transferred to the Research Data Store (RDS) in de-identified format. That is, all PII is removed from data in the RDS. Use and distribution of de-identified data is determined by policies created by DG&A [see "Roles & Responsibilities" section]
    a. Identified data that is provided by the data requestor may be returned in its original format to the data requestor if approved by the RDR.
11. DXP conducts data-related activities in accordance with Federal, State, and local policies and regulations, particularly as they pertain to privacy and confidentiality.
12. The exchange, merging, and de-identification of sector-based data creates a new de-identified database that allows research, evaluation, and audit activities that Partners could not do as individual sectors.
13. The transformation or linking of a party's or parties' data to another party's or parties' data shall not change the ownership of that data; the party or parties who own the original data shall continue to be considered the owner or owners of the transformed or linked data.
14. Hawai'i P-20 Partnerships for Education (Hawai'i P-20) has been established as the Managing Partner for DXP. Senate Concurrent Resolution 146, Regular Session of 2009, requested that Hawai'i P-20 convene appropriate agencies and develop DXP.
    a. Consensus or a formal vote by the Executive Committee may change the Managing Partner.

Hawai'i DXP Partners

Definition

1. A Hawai'i State agency established pursuant to State statute that:
    a. Is providing data considered to be essential to the education-to-workforce pipeline or longitudinal nature of DXP;
    b. Has signed an MOU to share data with other Partner agencies; and
    c. Is invested in the quality of the input and/or output of data;

or

2. A managing or administrative unit of a Partner (i.e., Managing Partner) that is responsible for the core functions of DXP, including but not limited to:
   a. The administration of DXP;
   b. Management of DXP data governance;
   c. Technical oversight of the DXP data warehouse;
   d. Development and maintenance of cross-sector reporting; and
   e. Resource and strategic planning for the short- and long-term sustainability of DXP.

Obligations

1. Provide resources to DXP for ongoing maintenance and support.
   a. Commit funds and personnel to support the long-term sustainability of DXP.
2. Provide data on an annual basis at a minimum, or more often as negotiated through MOU processes.
3. Abide by and enforce all DXP policies and processes.
4. Provide resources and subject matter expertise for the correct use/definition of data elements for data quality and reporting purposes.
5. Provide committee representation in all DXP committees and sub-committees.
6. Securely transfer and protect data in use and at rest to prevent inappropriate disclosure of PII.
7. Provide technical assistance to DXP necessary to ensure the protection of identified and de-identified data.

Benefits

1. Partners set the statewide critical policy questions (CPQ) agenda.
2. Partners have final approval on research priorities and research/data requests.
3. Partners establish data governance policies, processes, and procedures, and determine penalties for the misuse or inadvertent disclosure of data from DXP.
4. Partners have access to the de-identified Research Data Store (RDS) for preliminary analysis in preparation for a full data request/study.
   a. Approval for role-based access to the RDS is given by DG&A.
   b. Once the preliminary analysis is completed, Partners must follow all research and/or unit-level data request/approval processes established by RDR.
   c. Partners are prohibited from publishing or publically releasing data or reports without approval by RDR.

Access to Data

1. Access to identified data is prohibited under the terms of the Three- and Five-partner MOUs.
2. The data team of DXP's Managing Partner, Hawaiʻi P-20, has role-based access to identified data for management of data in the DXP data warehouse and for the validation and/or creation of reports and ad hoc datasets [see item 12 of the "Underlying Assumptions" section, and "Roles & Responsibilities" section].
3. DG&A approves Partner role-based access to the RDS.

Hawaiʻi DXP Affiliates

Definition
1. Provide new data sources to existing sectors in DXP (e.g., early childhood, K-12, postsecondary, workforce).
2. Provide new, unique individuals that are not found in public sector data or provides new information/data on existing individuals in sectors included in DXP.
3. Data to be provided meets the mission and purpose of DXP (i.e., allows the Partnership to better answer a CPQ).
4. Are invested in the quality of the input and/or output of data.
5. Have been approved as an Affiliate by DG&A.

Obligations
1. Provide data on an annual basis at a minimum, or more often as negotiated through MOU processes.
2. Abide by and enforce all DXP policies and processes.
3. Provide resources and subject matter expertise for the correct use/definition of data elements for data quality and reporting purposes.
4. Provide representation in all DXP sub-committees as requested and appropriate.
5. Securely transfer and protect data in use and at rest to prevent inappropriate disclosure of PII.
6. Provide technical assistance to DXP necessary to ensure the protection of identified and de-identified data.
7. Responsible for any fees for services as negotiated via contract and/or MOU.
   a. Services may include processes such as data integration into DXP, as well as the creation of de-identified datasets and reports.

Access to Data
1. Adhere to all established data governance policies, processes, and procedures to comply with data quality and access to reports and/or de-identified, unit level data.
2. All requests for reports and/or de-identified, unit-level data must be submitted to the RDR.
3. For an approved study or data request, Affiliates will have access to de-identified data that are linked to the population submitted by the Affiliate to DXP.

Roles and Responsibilities

Executive Committee (EC)

See Attachment A.

Responsibilities
1. Meets, at a minimum, one time per calendar year or more often as needed.

2.   Serves as the final decision-making body, particularly in cases of dispute that cannot be resolved by DG&A.
3.   Serve as resource allocators to sustain DXP core functions.
4.   Approves all data governance policies developed by DG&A.
5.   Serves as a voting member to DXP.
   a. Each Partner is responsible to have its lead Executive or a designee present for each meeting and/or vote, or the vote for that Partner is forfeited.
      i.   Partners may assign a designee for voting.
   b. A vote may be presented and recorded electronically.
6.   The decision process is as follows:
   a. EC decisions are based on consensus.
   b. If a dissenting opinion is recorded, EC will vote.
   c. A simple majority is required for a measure to pass, provided there is a quorum (e.g., at least three of five total Partners) present for all formal votes.
   d. Each Partner that has contributed data to DXP is allowed one vote.
7.   Voting membership:
   a.   Hawai‘i State Department of Education: Superintendent
   b.   University of Hawai‘i: President
   c.   Department of Labor and Industrial Relations: Director
   d.   Department of Health: Director (voting rights on hold until data are shared with DXP)
   e.   Department of Human Services: Director (voting rights on hold until data are shared with DXP)
8.   Other Partner representation
   a.   Partners may assign additional representatives to attend EC meetings.

Data Governance & Access (DG&A) Committee

DG&A, formerly known as the Steering Committee (see Attachment A)

DG&A Responsibilities
1.   DG&A will meet quarterly, or on an agreed-upon schedule.
   a. If a DG&A member is unable to attend a meeting, he/she may appoint a designee to participate on his/her behalf.
2.   Develops and implements policy and is responsible for enforcement of all approved policies.
   a.   DG&A forwards all developed policies to the Executive Committee for final approval.
3.   DG&A will assume responsibilities assigned to the sub-committees until workload warrants establishing the sub-committees, as determined by DG&A.
4.   Approves processes related to policy as determined by sub-committees.
5.   Provides oversight, management support, and conflict resolution to all sub-committees.
6.   Defines "user" roles and levels of access to data from DXP.
7.   Approves role-based user access to the RDR.
8.   Guides the prioritization of CPQs.
9.   In cases in which DG&A consensus cannot be reached, the issues will be referred for decision by the Executive Committee.

Managing Partner Responsibilities
1. Adheres to all established policies/processes for DXP.
2. Management of DXP resource and strategic planning for long-term sustainability.
3. Provision of the technical oversight of the DXP data warehouse which includes management of data extraction, transformation, and load (ETL) processes into and out of DXP.
4. Functions as the central point of contact for all DXP communications and management of resources which includes staffing for DXP for the administration, cross-sector reporting, training of end-users on data use, and provision of strategic planning for resource allocation.
5. Responsible for the development, implementation, and maintenance of cross-sector transition reporting.
6. Cross-sector coordination of data governance policies and processes.
7. Cross-sector coordination of DXP committee and sub-committee meetings.
8. Development and maintenance of DXP data element dictionaries and glossaries.
9. Development, implementation, and maintenance of training for use of data from DXP appropriate to the level of stakeholder group knowledge and skills.
10. Liaison for the DXP Partners to negotiate, write, implement, and maintain new MOUs for data sharing on behalf of the DXP Partners.
11. Provision of administrative reporting of DXP use (e.g., usage data/statistics).
12. Maintenance of data requests, approvals, and data destruction dates, and other administrative functions related to the transfer and use of data from DXP.
13. Ensure Institutional Review Board approval is complete and up-to-date.

Access to Data
1. Responsible for the reporting and technical infrastructure of DXP, and will therefore have access to PII for the purposes of:
    a. Validating the matching of data to the correct individual.
    b. Creating, validating, and resolving ad hoc unit-level data requests and questions on datasets.
        i. This includes tracking data user questions on "outlier" data to resolve data conflicts or anomalies for the end user (e.g., resolving what appears to be an inappropriate age for a third grade state assessment test).
2. Will identify and maintain a list of staff (known as the "Data Team") who are directly responsible for the management of the technical infrastructure, data validation, and all functions related to the development and maintenance of DXP cross-sector reporting and ad hoc unit-level data requests.
    a. Data Team members are required to sign the DXP Confidentiality & Security Agreement, as well as undergoing and maintaining Partner confidentiality and privacy training in order to be versed in individual Partner, Federal, State, and internal policies.
3. Will adhere to RDR policies and processes regarding data requests for reports and/or de-identified, unit-level data that will be publicly released.
4. Responsible for filling approved data sharing requests for collaborative Partner-based projects that require cross-sector data.
    a. Collaborative, cross-sector projects are defined as projects where at least two Partners have agreed to implement and execute a shared project such as GEAR UP Hawaiʻi.

Sub-committee Roles and Responsibilities

Sub-committees will be established by DG&A as workload warrants, as determined by DG&A. All sub-committees will meet at least quarterly or on an agreed-upon schedule. Sub-committees will ensure that a quorum is present for all meetings in which a decision will be made. Decisions will be made by consensus among the members, and may be made in-person or in electronic format.

Research & Data Request Sub-committee (RDR)

See Attachment A.

Responsibilities
1. Develops and implements guidelines for the review and prioritization of cross-sector research and data requests.
2. Reviews and approves all data requests and requests for reports.
   a. RDR may send a request back to the requestor for clarifications or to address any issues raised by RDR.
   b. If the data request is denied, the requestor may appeal the decision to DG&A.
3. Reviews all modifications to approved research and data requests.
4. RDR prioritizes all approved research and data requests.
   a. Works with the Managing Partner's Data Team to create the prioritization schedule and provide input as necessary.
5. Reviews all completed reports/studies prior to public release.
   a. Ensures compliance with the requestor's original data request(s) and confidentiality obligations.

Security & Access Sub-committee (S&A)

See Attachment A.

Responsibilities
1. Develops and implements processes for best practices in audit and monitoring for the security of DXP.
2. Develops and implements the policy and processes for investigations of misuse of data from DXP.
3. Develops and implements security breach guidelines for DXP.
4. Conducts all investigations of misuse of data.
5. Develops recommendations for penalties based on the result of any investigation of misuse of data.
6. Provides recommendations to DG&A for corrective action for the protection of data from DXP [see "Misuse of Data from DXP" section].

Data Quality Sub-committee (DQ)

See Attachment A.

Responsibilities
1. Identifies and escalates data quality issue(s) to the correct sector(s) for resolution.
2. Develops policies and processes for the correction of quality issues (e.g., notification to data users of a data "caveat" or recommended business rule to handle a data anomaly).
3. Maintains an "issue" log to define data quality anomalies.
4. Regularly edit, approve, and monitor a DXP data element dictionary and all associated glossaries.
5. Partner or Affiliate representative will provide timely resolution of data quality issues for their respective area.

Misuse of Data from DXP

Definition
1. "Misuse of data" is defined as:
    a. Theft or loss of data (e.g., due to a lost or stolen portable device).
    b. Inappropriately accessing of data, including the inappropriate transfer or disclosure of data from DXP to individuals who have not been granted permission to access, use of data in ways other than what was approved (i.e., re-purposing a dataset), or violation of any condition of the DXP Confidentiality & Security Agreement and data request form(s).
2. Reports of misuse of data from DXP are forwarded to S&A for penalty recommendation(s) to DG&A for enforcement or resolution.
    a. Any reported misuse of data from DXP will result in an internal investigation.
3. If an individual(s) or any organization or entity is determined to have misused data from DXP, a penalty may be enforced, such as a five-year ban on access to data from DXP.
    a. Individuals, organizations, or other entities may also be subject to Federal, State, or internal penalties as warranted.

Attachment A: Committee Memberships

Memberships will be updated as needed, as determined when new Partners or Affiliates are included in DXP, or as determined by DG&A for DG&A and its sub-committees in certain situations including but not limited to those in which positions or roles change within the organizations of Partners or Affiliates.

Executive Committee
Voting Membership:
- Hawai'i State Department of Education: Superintendent
- University of Hawai'i: President
- Department of Labor and Industrial Relations: Director
- Department of Health: Director
- Department of Human Services: Director

Attending Membership:
- Executive Office on Early Learning: Director
- Hawai'i State Department of Education
  - Office of Information Technology Services: Assistant Superintendent
  - Office of Strategy, Innovation and Performance: Assistant Superintendent
  - Data Governance and Analysis Branch, Director
- University of Hawai'i
  - Academic Planning & Policy: Vice President
  - Information Technology Services: Vice President
  - Community Colleges: Vice President
  - Hawai'i P-20 Partnerships for Education: Executive Director
- Department of Labor and Industrial Relations
  - Research and Statistics: Chief
  - Unemployment Insurance Division: Administrator
  - Workforce Development Council: Executive Director

Data Governance & Access Committee
Hawai'i State Department of Education:
- Data Governance and Analysis Branch, Director
- Enterprise Architecture Branch, Director

University of Hawai'i:
- Data Governance & Operations: Director
- Institutional Research and Analysis Office: Director
- Information Technology Services: Information Security Officer

Department of Labor and Industrial Relations:
- Research and Statistics: Chief
- Unemployment Insurance Division: Administrator

Workforce Development Council: Executive Director

Department of Health: TBA (on hold until data are shared with DXP)

Department of Human Services: TBA (on hold until data are shared with DXP)

Private Early Childhood Programs: Christina Cox, President of KCAA Preschools of Hawaii and liaison for Childcare Business Coalition

UH Hawaiʻi P-20 Partnerships for Education (Managing Partner for DXP):
Project Director, Program Manager

Research & Data Request Sub-committee
Hawaiʻi State Department of Education
Data Governance and Analysis Branch
Office of Strategy, Innovation and Performance
Assessment and Accountability Branch

University of Hawaiʻi
Academic Planning & Policy: representative from Council of Chief Academic Officers
Community College System Office
Institutional Research and Analysis Office
Student Affairs: representative from Council of Chief Student Affairs Officer

Department of Labor and Industrial Relations
Research and Statistics
Workforce Development Council

Department of Health (on hold until data are shared with DXP)

Department of Human Services (on hold until data are shared with DXP)

Private Early Childhood Programs (on hold until data are shared with DXP)

UH Hawaiʻi P-20 Partnerships for Education (Managing Partner for DXP)

Security & Access Sub-committee
Hawaiʻi State Department of Education
Enterprise Architecture Branch, Director
Enterprise Systems Branch, Director

University of Hawaiʻi
Data Governance & Operations: Director

Information Technology Services: Information Security Officer

Department of Labor and Industrial Relations
Electronic Data Processing Systems Office: Chief

Department of Health
Child & Adolescent Mental Health Division: Health Systems Management Office Chief

Department of Human Services

UH Hawai'i P-20 Partnerships for Education (Managing Partner for DXP)
Program Manager

Data Quality Sub-committee
Hawai'i State Department of Education
Data Governance and Analysis Branch: Institutional Analyst III (Data Quality)

University of Hawai'i
Hawai'i P-20 Partnerships for Education: Analyst
Institutional Research and Analysis Office: Analyst

Department of Labor and Industrial Relations
Research and Statistics: Research Statistician V

Department of Health (on hold until data are shared with DXP)
Early Intervention Section
Women, Infants and Children Services Branch

Department of Human Services (on hold until data are shared with DXP)

UH Hawai'i P-20 Partnerships for Education (Managing Partner for DXP)
Analyst

Attachment B: Authorized List of Personnel with Access to Identified Data

In accordance with Hawaiʻi Data eXchange Partnership's Data Governance Policy (Policy), the Managing Partner will maintain a list of personnel who have been authorized to have direct access to identified unit-level data for the sole purpose of performing their duties in connection with the uses authorized by the Policy.

This Authorized List of Personnel will be updated on an annual basis at a minimum, and will be reported to the Data Governance and Access Committee of the Hawaiʻi Data eXchange Partnership.

Last Updated: April 20, 2018

Name, Position/Title, and Organization

Janine Bocciardi, Database Administrator, Hawaiʻi P-20 Partnerships for Education

Meera Garud, Institutional Analyst, Hawaiʻi P-20 Partnerships for Education

Tracy Hongo, Data Governance Coordinator, Hawaiʻi P-20 Partnerships for Education

Anita Huang, Institutional Analyst, Hawaiʻi P-20 Partnerships for Education

Todd Ikenaga, Program Manager, Hawaiʻi P-20 Partnerships for Education

Jean Osumi, Project Director, Hawaiʻi P-20 Partnerships for Education

Renee Sakamoto, Business Intelligence Analyst, Hawaiʻi P-20 Partnerships for Education

Sela Unga, Graduate Assistant, Hawaiʻi P-20 Partnerships for Education

Attachment C: Definitions

For the purposes of this document:

Consensus: an opinion that is shared by all representatives of a committee or sub-committee

Cross-sector: data or research that involves at least two sectors of data (e.g., HIDOE and UH)

Within-sector: data or research that involves only one sector of data (e.g., HIDOE only)

Personally Identifiable Information (PII): data element, or combination of data elements, that allows the identification of an individual

De-identified: the masking of personally identifiable information that prevents the identification of an individual

Quorum: simple majority of eligible Partners or their respective representatives

Unit-level: refers to a dataset in which all the data elements in a particular row are aligned to one unique individual.