From: Holcombe, Rebecca [Rebecca.Holcombe@vermont.gov]
Sent: Friday, September 16, 2016 8:52 AM
To: Pepper, James
Subject: Executive privilege:: Review of PreNatal to Grade 12 Data Governance Manual
Attachments: VT Prenatal-Grade12 Governance Manual_Draft_082516 all.docx

Follow Up Flag: Follow up
Flag Status: Flagged

See below and attached.

Rebecca Holcombe, Secretary of Education
Vermont Agency of Education
219 North Main Street, Suite 402
Barre, VT 05641
(802) 479-1060
Rebecca.Holcombe@vermont.gov

From: Fowler, Amy
Sent: Tuesday, September 13, 2016 6:39 AM
To: Cadwallader-Staub, Julie
Cc: Talbott, Bill; Bouchey, Heather; Holcombe, Rebecca
Subject: RE: review of PreNatal to Grade 12 Data Governance Manual

Julie-

Our Deputy Team has met and reviewed this draft-our comments are throughout and reflect the thoughts of all of us. Please let me know if you need clarity on any of the comments suggested here.

Amy Fowler, EdD
Deputy Secretary
802-479-4308 (phone) 802-917-2065 (mobile)

From: Cadwallader-Staub, Julie
Sent: Tuesday, August 30, 2016 1:45 PM
To: Fowler, Amy; Talbott, Bill
Subject: review of PreNatal to Grade 12 Data Governance Manual

Hello Bill and Amy,

As co-chairs of AOE's SLDS Governance Committee, I am sending you the final draft of the Vermont's Prenatal-Grade 12 Data Governance Manual for your review. This Manual—much like the bylaws for a nonprofit—will guide our work going forward. As you may remember, the AOE's SLDS Governance Committee is a formal advisory committee to this PreNatal – Grade 12 Data Governance program. (Similar emails to this one are going out to the other committee chairs as well.)

An abbreviated version of background on this work:
Vermont's PreK to Grade 12 Data Governance program is project 21 of the Early Learning Challenge grant. It seeks to accomplish the following:
- Ensure effective and efficient development and use of early childhood data and reporting systems in Vermont
- Enable early childhood data systems and the state's education data system to align, allowing outcomes to be traced from birth through grade three reading assessment to high school graduation.
- Ensure coordinated early learning data system that enhances, is aligned with, and is interoperable with the existing and new systems.
  We are establishing a *federated*, not an integrated, system: in other words, Vermont's Prenatal-Grade 12 Data Governance system does not supersede existing data governance systems of state agencies. Rather, it establishes policies and procedures to allow sharing of specific data elements in order to answer specific policy questions that cross agencies, age ranges, and programs.

We are asking now for your feedback, comments or questions about the PreNatal to Grade 12 Data Governance Manual, as attached. If possible, I would appreciate comments back to me by **Wednesday, September 21st**. If this is not possible, let me know. If I don't hear from you, I'll assume that the Manual is fine as it is from your perspective. After hearing from the three formal advisory groups, these statements will move to the Early Childhood Interagency Coordinating Team for their review and approval.

Thank you for your assistance!
Julie

Julie Cadwallader Staub, MSW
Grant Director, Vermont's Early Learning Challenge
280 State Drive, 2 NOB
Waterbury, VT 05671

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Vermont

**Prenatal – Grade 12 Data Governance
Governance Manual**

Version 1.0

insert date when finalized

DRAFT   **DRAFT**   **DRAFT**

REVISION HISTORY

Date	Name	Description
		Initial draft version 1.0

WHAT IS GOVERNANCE?

Governance can be applied in many areas within and across organizations, such as data management, information technology architecture and infrastructure, or implementation of state or federal programs. According to the Project Management Institute (PMI) Standard for Program Management: "governance is defined as the process of developing, communicating, implementing, monitoring, and assuring the policies, procedures, organization structures, and practices associated with a given program. Governance is oversight and control." The mission of a governance program is to establish coordination and accountability protocols and clarify the operational chain of command. Additionally, the governance program sets out accountability processes for identifying and addressing issues relating to noncompliance with those protocols or the chain of command.

Establishment of a ***data governance*** program is standard business practice across many industries, especially when interagency data sharing is involved. Data governance policies and processes establish agreed upon parameters within which data is standardized, collected, securely stored, analyzed, shared and used all while protecting individual privacy and confidentiality. For example, data governance processes typically address Memoranda of Understanding and Data Sharing Agreements between organizations and the prioritization and execution of research and analytical processes.

Data governance ensures that data are:

- Reliable
- ~~Consistent~~
- ~~Valid~~
- Complete
- Timely
- Available to those with a legitimate need for and authority to access the data
- Unavailable to those without a legitimate need or authorization for it

Data governance is *NOT* data cleansing; data extraction, transformation or loading activities; data warehousing; database design; or project management. While each of these is affected by or related to the data governance program, data governance addresses more than these disciplines and each of these areas has facets beyond data governance, such as technological and architectural solutions.

Multiple Layers of Data Governance

Data governance programs undertake multiple types of activities, from detailed data management to project management to high-level coordination and planning. A successful governance program demands the vision, leadership and cooperation of people at all levels of implementation: leadership, project managers, program staff, and agency subject matter experts. The commitment of the leadership team is essential for the success of a data governance program. The scope and goals of governance activities differ for data management, project management and overall program coordination, as outlined below:

Commented [A2]:
We find this a generic description of data governance- we don't object but believe people will skip. Would recommend reducing to only 2 pages of intro

Commented [A3]: Consistent is redundant
Validity is quality of inference

Commented [A4]: Not sure this is the right word? Unclear what author means. i.e., data warehousing is not a discipline. "Aspects of data management" perhaps?

Commented [A5]: No Edits for this section; read and affirmed

Data Management addresses issues such as data management policies, data quality, business process management, and risk management surrounding data elements and data systems. Data governance establishes and enforces data standards, common vocabulary, and reports within an organization or for cross agency data alignment. It enables management to more easily integrate, synchronize and consolidate data from different programs or sectors and across organizations.

Project Management provides a framework for decision-making around specific projects, usually within a larger program or organization. Projects have specific start and end dates and are typically focused on specific content, outcomes and deliverables to be completed on time and on budget. Project governance decisions are often focused on scope, schedules, resources and technical tasks.

Program Coordination provides a structure and framework for governance program goal setting, strategic planning and decision-making. The overarching governance plan identifies key roles and responsibilities for each organization and the people involved in the program. It identifies the key stakeholders involved in program management and who is authorized to approve program activities and priorities.

A strong *data* governance program is specifically designed to provide oversight that ensures confidentiality, integrity, and availability of the data by reducing data security risks due to unauthorized access or misuse of the data. A strong data governance program also provides transparency into how the data is managed, who generates it and who consumes it.

Commented [A6]: In general ,we think this section is clear and succinct. It clearly maps out what these different aspects are and why they're important.

Change Management

Governance programs for long-term programs and data management also typically develop processes to standardize the methods and procedures to accommodate future changes. For example, governance committees typically make decisions about changes to services, system functionality, and data definitions. Change management procedures introduce standard and methodical policies and procedures for requesting, documenting, testing, approving and implementing system changes and dealing with emergency changes.

Commented [A7]: No Edits for this section; read and affirmed but again we do not believe this is necessary or unique to this document and makes it longer than is absolutely necessary.

ESTABLISHING PRENATAL-GRADE 12 DATA GOVERNANCE IN VERMONT

Vermont was awarded $36.9 million in federal funding in 2014 through the Race to the Top (RTT) Early Learning Challenge (ELC) grant program to build a high quality and accessible early childhood system in the state. Five key ~~agencies~~~~entities~~entities are guiding the implementation of the ELC Grant, including the 1)Governor's Office, 2) Agency of Education (AOE), Agency of Human Services (AHS) – particularly Vermont 3) Department of Health (VDH) and 4) Department of Children and Families (DCF), and the 5) Building Bright Futures (BBF) State Advisory Council. One deliverable under Vermont's ELC grant is the creation of a Prenatal-Grade 12 Data Governance Council (DGC) that is responsible for establishing policies and procedures for an ~~early~~ early learning data system to help inform policy and practices that can improve school readiness of children statewide. The same five ~~agencies~~entities, plus the Department of Mental Health, have responsibility for implementing the Prenatal-Grade 12 Data Governance Program.

> **Commented [A8]:** We think this section, as an intro to the need for the document, should come first (see my preceding questions).

> **Commented [A9]:** Entity is generic, Agency is a specific term that has specific meaning, using it in a lower-case way will engender confusion in the long run

> **Commented [A10]:** Can we assume the governor's office will remain a part of this process after the election?

> **Commented [A11]:** To the extent this can be a data sharing protocol vs a system which implies a singular thing with hardware and infrastructure we think it is more accurate of a description

> **Commented [A12]:** May also consider the involvement of Labor for many indicators related to secondary education students and Voc Rehab as well

In Vermont, there is no single organization that has been designated to centralize and coordinate data to be shared between education, health and human services for the purposes of evaluating the relationships between prenatal and early childhood programs and long-term educational and health outcomes. The Race to the Top Early Learning Challenge grant has enabled state ~~agencies~~entities, early childhood programs and other stakeholders to come together to form the Prenatal-Grade12 Data Governance Program to build a interagency data sharing and analysis partnership to address early childhood and K-12 policies, programs and outcomes. This data governance program will oversee sophisticated data sharing and technology solutions, multiple regulations guiding data privacy and security, and detailed data sharing agreements between state ~~agencies~~entities and early childhood programs.

> **Commented [A13]:** This paragraph is somewhat redundant

The goal of the Prenatal-Grade 12 Data Governance Program is to facilitate coordinated interagency data sharing and analytical processes as a long-term, sustainable program that coordinates data storage, access, use and dissemination activities. These activities will be used to provide actionable information to policymakers, state ~~agencies~~entities, families and program providers. The term "~~agency~~Entity" is defined as consisting of government and non-government (e.g., Head Start and Early Head Start programs) organizations. Data may originate with and be shared by a variety of local and regional organizations, and State ~~agencies~~entities may store, share, use, analyze, and disseminate the data. The effectiveness of interagency analyses that span prenatal, early childhood and Kindergarten-Grade 12 data, and beyond, depends on the effective and efficient data management processes using multiple, disparate data sources.

> **Commented [A14]:** This example is problematic- Head Start has both independent and government affiliations. It is not clearly non-government. These are both directly affiliated with government; we have state government offices affiliated with these…not sure what this means, perhaps BBF is a better example

The Prenatal-Grade 12 Data Governance Program, which includes a hierarchical organizational structure and both agency and non-agency representation, is intended to supplement, but *NOT* to preempt, data management and data governance activities within any state agency or participating organization. The Prenatal-Grade 12 Data Governance Program is designed to guide interagency data management, sharing, analytical, and dissemination activities. Figure 1 shows how the Prenatal-Grade 12 Data Governance Program works with state ~~agencies~~and external entities to share data for *interagency*

> **Commented [A15]:** It would be best to highlight here that MOUs are still needed within this governance system.
>
> AOE, AHS and Labor are all in process of co-negotiating MOUs related to these topics

> **Commented [A16]:** We find the inclusion of non-Agency/state government membership problematic here. We can disseminate data to others but the sharing of data on the front end creates complications.
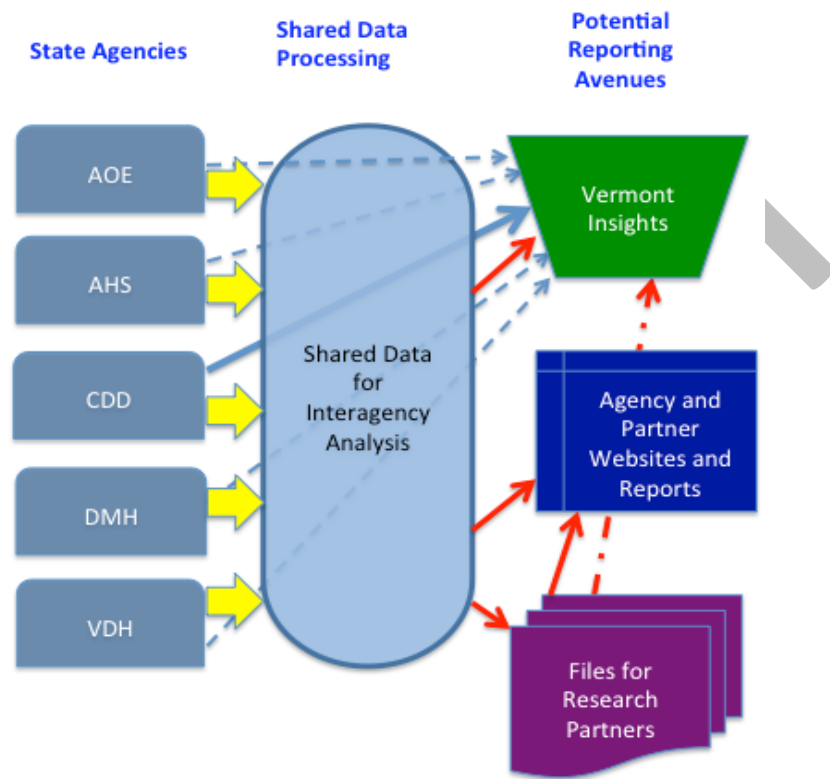
analyses and disseminate findings through a variety of venues, including Vermont Insights, the state's early childhood aggregate data reporting system. Individual ~~agencies~~entities may also be sharing aggregate *program-specific* data with Vermont Insights or others at the same time.

Figure 1. Coordination of the Prenatal-Grade 12 Data Governance Program

Commented [A17]: Throughout the document there is a high focus on early learning despite this being prenatal-12, would be good to either expand examples or set stage that this work is beginning at early childhood and later projects will emerge

Commented [A18R17]: We assume that you have chosen to focus on the early learning aspect now and are not yet ready to include elements beyond that time frame. If so, the recommendation to include labor would be premature

Commented [A19]:
The graphic is confusing…AHS is the umbrella group for CDD, DMH, VDH but presented as peers, there are actually two Agencies: AOE and AHS, perhaps add Labor

The arrows are confusing to us, we don't understand the solid vs dotted lines.

Need to have a legend when you are ready

Recommend re-working this diagram as it produced more questions than it answered

Participation in the Prenatal-Grade 12 Data Governance Program is not mandated for any organization, and is dependent on resources and capacity of any entity to participate. T~~although t~~he Governor's office, AOE, AHS – specifically DCF and VDH, and BBF are implementation partners for the ELC Grant. Participation is strongly encouraged in order to ensure coordinated and cost efficient data sharing and analytical efforts statewide. Membership may change over time due to priorities and resources, but A~~a~~gencies (AOE and AHS) that have executed interagency data sharing agreements should be involved in the data governance program.

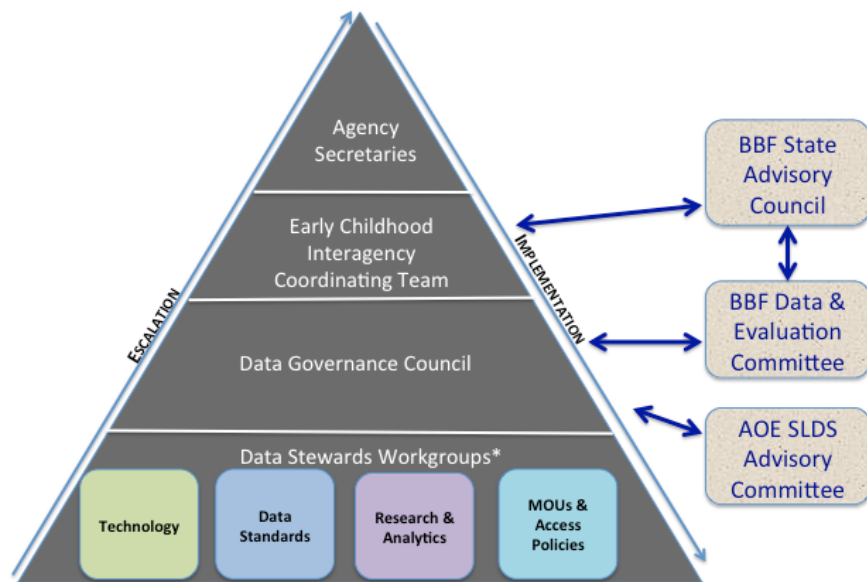**Commented [A20]:** Political changes?

PRENATAL-GRADE 12 DATA GOVERNANCE PROGRAM DESCRIPTION

Governance Committee Structure and Responsibilities

The Prenatal-Grade 12 Data Governance Program benefits from planning and oversight via a hierarchical organizational structure, as displayed in Figure 2. This structure was vetted with multiple stakeholders from August to October 2015 and was approved by the Early Childhood Interagency Coordinating Team (ECICT) in November of 2015. Ultimate authority for data governance program activities rests with the secretaries for each state agency.

> **Commented [A21]:** We are unclear who this group is; please send us a membership list

The ECICT is comporised of State agency leaders in early childhood from Maternal and Child Health, the Child Development Division, the Agency of Education, Children's Mental Health, the Agency of Human Services' Secretary's office, and the Executive Director of Building Bright Futures. ECICT provides direction to the Data Governance Council, with Secretary approval, and is responsible for ensuring that data governance efforts address all relevant and mission-critical needs. ECICT manages interagency data governance as a united effort rather than as a set of unconnected disconnected agency-specific projects. It also obtains needed funding and resources and maintains final authority and responsibility for the program.

> **Commented [A22]:** We find the narrative difficult to follow because it starts at level 2 to describe interactions with level 3- Data Governance. It would be better to either work up or work down; either way
>
> In addition we assume you would replicate this description for other age groups as needed because they won't all have an ECICT equivalent

> **Commented [A23]:** This is problematic as it sets up a conflict in funding priorities in already strapped departments and Agencies

Figure 2. Prenatal-Grade 12 Data Governance Program Committee Structure

> **Commented [A24]:** Our assumption is that if you are in the Grey triangle you are a state employee? Correct?
>
> MOUs and Policy are executed by secretaries; Data Stewards can draft, propose, implement but not originate- this depiction implies they have that authority
>
> Assume you would create this chart for other age groups as they won't all have an ECICT?
>
> We don't understand what the arrows mean; need more information about the intersection with AOE SLDS
>
> Note creates concern over appetite for workgroups that exceed capacity

Can bring in non-state agency stakeholders on appropriate workgroups to help develop proposed solutions and/or implementation.
This graphic contains a sample list of the types of workgroups to engage, not a finite list..

The **Data Governance Council (DGC)** is comprised of State agency and BBF State Advisory Council (BBF SAC) program and project directors, with the ELC Grant Director serving as the facilitator. The DGC has a representative from Building Bright Futures (BBF)'s Vermont Insights, the Governor's Office, and the Department of Information and Innovation as ex officio members to help with coordination and collaboration. The state agency members represent data collection owners, analytical staff and/or Information Technology (IT) staff who have the ability, authority and responsibility to represent their agency data concerns. They may be referred to as data owners as they represent the department or program that owns particular data collections and reporting requirements. The DGC will implement the policies of the executive leadership team. It reviews, approves, and oversees the scope of work and data governance program activities, along with processes and procedures developed through the governance process. The DGC, following guidance from the executive team, also prioritizes data governance efforts and communicates with internal and external stakeholders. It identifies staff (data stewards) to participate on topic-specific workgroups that are tasked with developing processes and procedures related to interagency data storage, access, use and dissemination.

Data Stewards Workgroups are comprised of agency and non-agency subject matter experts, including program or division representatives who are responsible for managing specific agency data collections, analyses activities or facets of IT (e.g., database administrator, security and privacy technology, business intelligence tools). The data stewards workgroups analyze any tactical issues that arise, advise the DGC of recommended solutions, resolve technical issues within their domains accordingly, and implement the policies and plans approved by the DGC and executive team. Data Stewards workgroups may be convened on a short- or long-term basis, as necessary, and they may include subject matter experts from outside state ~~agencies~~entities as they analyze solutions and develop recommendations.

Data Governance Program **Advisory Committees** (i.e., the BBF State Advisory Council, BBF Data & Evaluation Committee and AOE State Longitudinal Data System Committee) will bring representation from state ~~agencies~~entities, local providers, regional councils, non-profits and philanthropy. The advisory committees will provide ongoing review, feedback and input on legislative, programmatic or data-related issues and support the public information efforts of the Prenatal-Grade 12 data governance program. The advisory committees will also advise on the prioritization of reporting and research activities that meet the information needs of policymakers and practitioners. Additional ad hoc advisory committees may be established as needed on a short- or long-term basis with a variety of external subject matter experts to address particular issues.

Figure 3 displays the primary responsibilities for the three key data governance groups. Once the DGC creates a Data Steward Workgroup to address a specific activity (e.g., identify key variables to share and map to a central data standard), the workgroup develops a proposal for how to implement a solution and submits that proposal to the DGC. Once the DGC has reviewed the proposal, it will request changes from the Data Steward Workgroup or approve the proposal as is. Once approved, the DGC will send to the ECICT for review and approval. The ECICT may request changes or approve the proposal. Once approved by the ECICT, ECICT members will inform their respective Senior Agency Leadership of the proposal ~~or~~and request their review and final approval.

Commented [A25]: This is level 3 in the diagram and 2nd described, multiple references to the "executive team" which may or may not mean the ECICT or Secretaries and the work described needs Secretarial approval

Commented [A26]: Julie- we know that you've served in this capacity so far, but we worry about creating a system around a grant funded position rather than permanent staff.

Commented [A27]: This is concerning to us given that we are so thinly staffed and overtasked already in this area within AOE. We need to manage public expectations for the scope of work we can provide.

Commented [A28]: This belongs to Agency leadership- prioritizing must first meet statutory demands with limited resources

Commented [A29]: Read no concerns

Commented [A30]: This seems like a lot of new workgroups, committees, subcouncils, etc. This relates to the same concerns as before re bandwidth;

Commented [A31]: Again we are concerned about the priority setting being delegated to those who do not have budgetary authority over staffing needs. We cannot meet all required demands currently, this sets us up for disappointing people or overwhelming staff when they are under-resourced.
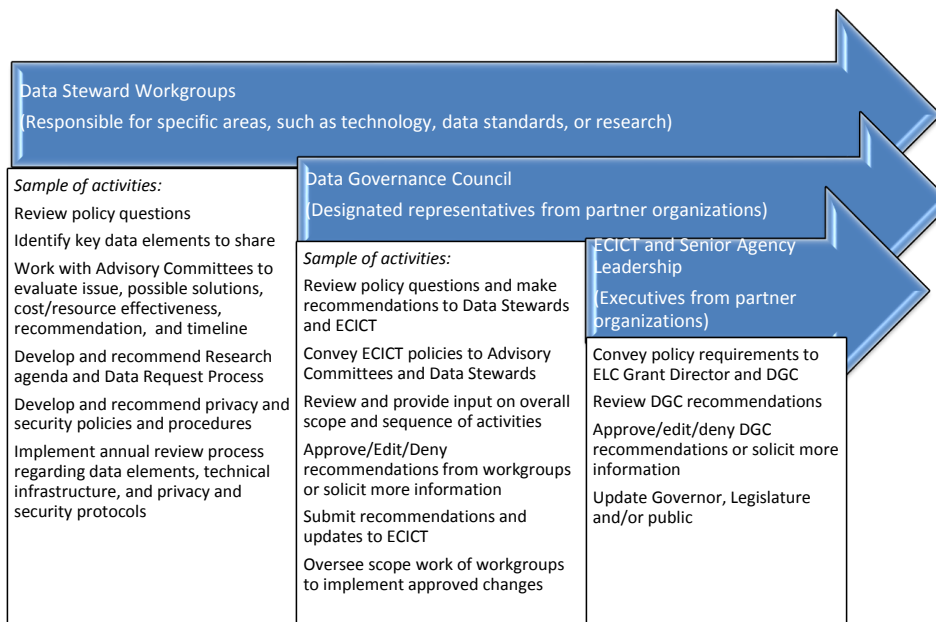
Commented [A32]: This create a huge burden for AOE to attend every educationally related meeting when we are very small in staffing and this often leads to us meeting with multiple different AHS staff on a variety of topics- very concerned this will swamp us.

Commented [A33]: These decisions need to be made by Secretaries or their designee.

Figure 3. **Governance Committee and Work Group Responsibilities**

Data Steward Workgroups

(Responsible for specific areas, such as technology, data standards, or research)

Sample of activities:

Review policy questions

Identify key data elements to share

Work with Advisory Committees to evaluate issue, possible solutions, cost/resource effectiveness, recommendation, and timeline

Develop and recommend Research agenda and Data Request Process

Develop and recommend privacy and security policies and procedures

Implement annual review process regarding data elements, technical infrastructure, and privacy and security protocols

Data Governance Council

(Designated representatives from partner organizations)

Sample of activities:

Review policy questions and make recommendations to Data Stewards and ECICT

Convey ECICT policies to Advisory Committees and Data Stewards

Review and provide input on overall scope and sequence of activities

Approve/Edit/Deny recommendations from workgroups or solicit more information

Submit recommendations and updates to ECICT

Oversee scope work of workgroups to implement approved changes

ECICT and Senior Agency Leadership

(Executives from partner organizations)

Convey policy requirements to ELC Grant Director and DGC

Review DGC recommendations

Approve/edit/deny DGC recommendations or solicit more information

Update Governor, Legislature and/or public

Example of Prenatal-Grade 12 Data Governance Process

The mission of the Vermont Prenatal-Grade 12 Data Governance Program is to establish federated data management and ~~data~~ data sharing processes with the key participating ~~agencies~~entities of education and human services and inform policies and practices that support better outcomes for children and families. ~~Policy questions that require interagency analyses can come from any stakeholder in Vermont, including but not limited to state agenciesentities, legislators, or program providers~~. Interagency policy questions that will be addressed by the Prenatal-Grade 12 Data Governance Program are vetted and prioritized through review and discussion by the DGC and ECICT, as well as the program's Advisory Committees to ensure input from external stakeholders.

For example, ~~a stakeholder~~VDH wants to know how children whose mothers received late or no prenatal care perform on the Readiness for Kindergarten Survey and Grade 3 Reading and Mathematics tests. The answer to this question requires data from multiple sources, including Vermont Department of Health data and data from the Agency of Education Statewide Longitudinal Data System. To answer the question the DGC needs to

- Assign staff and resources to identify and evaluate availability of data elements needed from each data source,
- Ensure the programs have an executed Memorandum of Understanding (MOU),
- Engage subject matter experts to develop the data sharing and analysis plans,

Commented [A34]: Here you make the 4 levels into 3 by combining ECICT and Executives which are not the same and reduce clarity- we believe there are 4 levels and maintain coherence

Data Governance Council
Not a Policy making body- that's Secretaries, they can recommend but not decide
They are a work group, they should suggest and generate but the senior level will prioritize and make sure we have capacity to carry out

Perhaps a cycle would be a better representation of the work

Commented [A35]: Your example highlights a key question we have. Currently if VDH wanted to accomplish this work they would execute the MOU with AOE for the data but they would not need to intersect with all of the other layers-DGC, ECICT, Data Stewards, etc. We don't clearly see the efficiency the proposal is seeking to achieve- this feels a bit beauracratic.

Commented [A36]: This is pretty open ended and we are not sure that is the case for what can be done reasonably- this creates a problem for public appetite for work that cannot be sustained

AOE does not have the resources to respond to all stakeholder requests, let alone legislators. We have regular requests for staff that go unmet today.

Commented [A37]: We changed from stakeholder to VDH assuming this would be a VDH priority. We know we cannot respond to ad hoc requests that are not aligned to mission critical work.

- Share the plans with advisory committees for review and comment, and
- Send to the ECICT for review.
- The ECICT will send the proposal to the Secretaries for and approval.

Participating Partner Organizations

State agency representatives, advisory group members and subject matter experts from the field will be efficiently and effectively engaged in governance program activities over the life of the program. Figure 4 identifies the state agenciesentities involved in the Prenatal-Grade 12 Governance Program and lists the personnel participate that in each governance committee.

Figure 4. Prenatal-Grade 12 Governance Program Committee Members*

ECICT

AHS CO: Director, Policy and Planning

AOE: Director, Integrated Support for Learning, Pre-K – Middle School

BBF: Executive Director

DCF: Deputy Commissioner, Child Development Division

DMH: Director, Children's Mental Health

VDH: Director, Maternal and Child Health

ELC: Grant Director

Data Governance Council

AHS CO: Chief Information Officer
        Performance Improvement Manager
        Enterprise Business Architect

AOE: Information Technology Manager
        Director, Analysis and Data management

BBF**: Senior Consulting Director, Vermont Insights

CDD: Operations Administrator, CDD

DII**: Information Enterprise Architect

DMH: Chief of Research & Statistics

Governor's Office**: Early Childhood Liaison

Head Start State Collaboration Office: Director

VDH: Director, Center for Health Statistics
        Home Visiting Data Coordinator, Maternal and Child Health

ELC: Grant Director**

* One vote per organization, not per person   **non-voting members

Data Governance Program Coordination

The ELC Grant Director provides functional and organizational infrastructure support to the Prenatal-Grade 12 Data Governance Program and will serve initially as the Data Governance Coordinator. The Data Governance Coordinator makes decisions as necessary to fulfill the data program's mission and serves as the liaison to the ECICT. The Data Governance Coordinator, currently located in DCF, will work hand-in-hand with Prenatal-Grade 12 data governance committees to execute the policies and activities as directed by the ECICT. When the program is fully operational, a Data Governance Coordinator may need to be hired to be responsible for the day-to-day operation of the program and provide support to data governance council and committee meetings, including agenda development and dissemination of meeting minutes. At that time, choosing a chair and vice chair from among the voting members, to work with the Data Governance Coordinator, should also be considered.

Commented [A38]:
ECICT
Again assume you'd create parallels for other ages ECFICT doesn't exist everywhere

This prioritizes the "votes" of AHS entities in making decisions, unless you are saying that AHS has 1 vote and AOE has one vote

This needs to make it clear that the Agency leadership makes decisions

Data Governance
Worry about the membership and the amount of time spent in meetings. Need details regarding the expectations.

We are concerned about non-state Agencies

Again, you changed from 4 levels to now 2, which means people can't track the work and flow- you could simlply put the ECICT chart in the section with that group and then DGC with that section instead combining here

Commented [A39]: Concerned about long term stability with grant funding here.

Also worried if the grant director can do both of these tasks; I think a separate position or structure for all of this data governance and coordination is critical.

Want to be clear that decision making belongs to Secretaries

Where would this person be based? And how funded? Does this count as inkind?

Data Governance Policy

Prenatal-Grade 12 Data Governance Program policies require each participating partner organization to:

- **Participate in the statewide Prenatal-Grade 12 data governance program**: Representatives from partner organizations will participate in the governance program by serving on committees and/or providing input when asked. Committee members will represent their organization and have the authority and responsibility to make decisions on behalf of their organization for the benefit of the Prenatal-Grade 12 data governance program statewide.

- **Assign Subject Matter Experts (SMEs) to participate in Governance Committee meetings**: Partner organizations will designate SMEs from their respective organizations with sufficient expertise and give them the authority and responsibility to make recommendations to the governance committees and Governance Coordinator on preferred solutions, processes or procedures.

Commented [A40]: Earlier it was stated that participation was voluntary based on available resources, now these are requirements- message needs to be consistent

Commented [A41]: This feels like additional meetings rather than an increase in efficiency to accomplish the same work.

Commented [A42]: We wonder if you actually mean the data stewards? We aren't sure what this means.
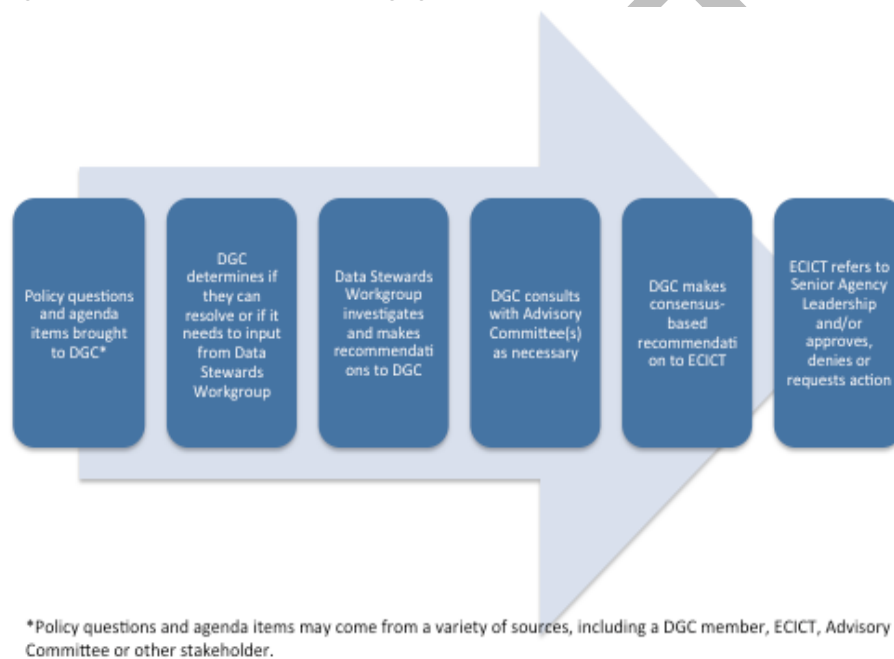
PRENATAL-GRADE 12 DATA GOVERNANCE PROGRAM PROCESS

The governance program requires established processes with regard to decision-making, organizational responsibilities and documentation support. The governance program will need to establish processes to review policies and procedures, and to escalate these to the next level for decision-making, as needed. These processes will determine who reviews what and how issues will be dealt with when consensus is not achieved in workgroups or committees. It is also important that the governance program has a plan to engage subject matter experts through workgroups and Advisory Committees to ensure the committee has access to high levels of technical and subject matter expertise. Figure 5 summarizes the general workflow through the data governance program.

> **Commented [A43]:** We find this chart difficult to read
>
> This implies policy is brought from a wide variety of sources- we don't have the resources to do all of this.
>
> We believe only DGC members who are directly involved should be at meetings; don't take the time of people not involved from the example, only VDH, AOE on page 10 should be there
>
> Who is the Advisory Committee? Is that ECICT?
>
> Prioritization of resources needs to come earlier, and needs to be a decision for the respective Secretaries

Figure 5. Workflow Process for Addressing Agenda Items

Policy questions and agenda items brought to DGC* → DGC determines if they can resolve or if it needs to input from Data Stewards Workgroup → Data Stewards Workgroup investigates and makes recommendations to DGC → DGC consults with Advisory Committee(s) as necessary → DGC makes consensus-based recommendation to ECICT → ECICT refers to Senior Agency Leadership and/or approves, denies or requests action

*Policy questions and agenda items may come from a variety of sources, including a DGC member, ECICT, Advisory Committee or other stakeholder.

Over time, questions about early childhood or education data systems or program effectiveness may be sent to participating partner organizations or the Data Governance Coordinator for referral to the DGC. The questions may be accepted as critical policy or analytical questions for which cross-program analyses and reports are produced, or the DGC may decide to refer the question elsewhere if deemed out of scope of the Prenatal-Grade 12 data governance program. For example, a question about the number of children participating in Head Start programs over the last three years would not meet the requirements for review by the Prenatal-Grade 12 Data Governance Program, since it requires data from

> **Commented [A44]:** Again, how will this work for other ages

> **Commented [A45]:** This compels us to react to requests and prevents proactive planning. Also the determination that something is a critical policy or analytic question belongs to Secretary

only the Head Start program. This question would be referred to the Head Start State Collaboration Office.

Data Governance Program Decision-Making Process

Decisions are made by consensus (unanimity):

- o If consensus is not reached, the matter at hand is addressed through negotiation, formal vote (either in person or via email) or escalated to the next level of governance.
- o Lack of consensus is determined when a member or their designate objects to a proposed action or decision. In the event of non-consensus, each partner organization has one vote to be cast by its respective representatives or designates.
- o Each Governance committee member is required to send a delegate to vote on their behalf if they are not able to attend a meeting. In the event of the absence of a governance committee member authorized to participate in consensus or vote, and if a delegate was not sent to represent that agency, the partner organization agrees to adhere to the decision made by the group, unless there were extenuating circumstances for the absences. In that case, the partner organization may be given an opportunity to request reconsideration of the decision reached in their absence.
- o At all levels of the decision-making process, negotiation and modifications to the proposed decision will occur in an effort to reach consensus.
- o If consensus is not reached in ECICT or by senior agency leadership, no action on the matter will be taken and a new proposal may be developed by the DGC.
- o Ex officio members—those members who do not own data shall provide input to committees or partners but do not have a vote.

Decisions are documented as made and distributed to partner ~~agencies~~entities:

- o An agenda detailing decisions to be made at a meeting, and any supporting documentation, is distributed to partners at least three days in advance of a meeting.
- o Items for action at a meeting must be distributed at least seven calendar days in advance.
- o Meeting notes summarize decisions made, votes or abstentions of each partner.

Each governance committee member is responsible for understanding the level of authority delegated to him or her by the agency executive and communicating in a timely fashion to their committee and/or the governance coordinator when a decision is to be made outside the scope of his or her authority. For example, DGC members would likely refer legal discussions to agency general counsel or create a workgroup consisting of agency legal counsel.

Data Governance Operating Procedures:

- Each governance committee will include at least one representative from key partner organizations, but there is only one vote per organization.

Comments (margin):

Commented [A46]: This example spurs the question why each Agency would not simply produce their "slice of the data" to send to other Entities making a data request rather than merging on the State's dime.

We would like to see a way that puts the greater burden for analysis on the requestor rather than the data supplier.

Commented [A47]: This section is very unclear to us- I cannot tell what is and isn't the "process" at each step

Commented [A48]: But later you say votes- not unanimous- why not move straight to votes

Commented [A49]: Unbalanced votes between Agencies

WE believe for efficiency only proposals that are supported by the lower level should brought up for consideration, each level should be filtering requests as the demand will exceed our capacity

Commented [A50]: Each Agency or member? BBF has a vote over AHS/AOE analytic tasks?

Commented [A51]: We have no idea how frequently this group is meeting, how the meetings are scheduled and if there is appropriate notice for people to find someone else to attend- plus earlier you said this is voluntary, now required

Again any vote cast at DGC or ECICT would need confirmed by Secretary prior to resource allocation- it needs to be explicit that decisions belong to Secretaries, recommendations belong to ECICT and DGC

Commented [A52]: Secretaries will decide if they have resources

Commented [A53]: This feels like a never=ending negotiation about projects that may not have benefit- recommend no more than 2 considerations of any individual projects

Commented [A54]: Problematic to be at the discussion table some information is privileged- high risk

Commented [A55]: This needs to come much sooner, many of our comments relate to decision making power- We use RAPID at AOE to clearly delineate different roles.

Commented [A56]: We had to stop reviewing here after a two hour review- will review the next time it is submitted for consideration

- DGC members will consist of designated representatives from participating partner organizations.
- DGC decisions and recommendations are submitted to the ECICT for final approval.
- Issues that cannot be resolved in the DGC meetings will be escalated to the ECICT.
- Issues that cannot be resolved in the Data Steward Workgroups will be escalated to the DGC.
- Governance committees may solicit input from other committees, Advisory Committees, or other external stakeholders not already participating in the Governance Program.
- Data Steward Workgroups make recommendations to the DGC, but do not have the authority to make binding decisions on behalf of the Prenatal-Grade 12 Governance Program.
- Advisory Committees make recommendations in response to requests from any governance committee, and the Governance Coordinator takes those recommendations to the DGC for consideration and decision-making, as needed.
- Members of each committee are required to attend regularly scheduled meetings or send a designee in member's place, and to respond to all action items in a timely manner.
- Consistently inactive members will be identified and their agency's ECICT representative will be asked to appoint another representative in their place.
- Members of all committees are responsible for reviewing all materials prior to meetings and participating in all data governance discussions with an enterprise-wide focus for the governance program, not just as a representative of a participating partner organization.
- Members will serve at the pleasure of the ECICT and Senior Agency leadership.

Documentation Support by the Data Governance Coordinator

To the extent possible:

- Agendas will be distributed five days in advance of meetings and clearly identify items for action, discussion, or for information only.
- Ensure that meeting notes are taken and distributed to group members and interested others within one week of the meeting.
- Action items listing responsible parties will be documented in the meeting notes.
- All documents slated for review will be delivered electronically to group members five days in advance of the meeting.

PRENATAL-GRADE 12 DATA GOVERNANCE PROGRAM STATEMENTS

Mission Statement

The mission of the Vermont Prenatal-Grade 12 Data Governance Program is to establish federated data management (e.g., aligning data element definitions, data mapping, data standards, linking methodology) and data sharing processes with the key participating ~~agencies~~entities of education and human services and inform policies and practices that support better outcomes for children and families.

Purpose Statement

The purpose of the Vermont Prenatal-Grade 12 Data Governance Program is to ensure and support coordinated and effective governance for all aspects of interagency planning and data management, maintenance, protection, access and sharing for appropriate use.

Scope of Work Statement

The scope of the Vermont Prenatal-Grade 12 Data Governance Program is, in no particular order, to:

Partnerships and Collaboration

1. Establish sustainable, productive interagency partnerships;
2. Engage and collaborate with the Data Governance Program Advisory Councils (i.e., the Building Bright Futures State Advisory Council (BBF SAC); BBF SAC's Data & Evaluation Committee and the Agency of Education Statewide Longitudinal Data System Advisory Council) to receive their input and insight into the governance program coordination of priorities, analyses and reporting;
3. Engage public and private subject matter experts and groups in data governance workgroups and/or individually to gather insight and feedback into proposed policies and processes prior to submitting recommendations to ECICT and senior agency leadership;
4. *Create mechanism for consideration and review of possible expansion of the Data Governance Program to include additional data sources (e.g., postsecondary, workforce, and Adult Health Outcomes) to facilitate analyses of long-term outcomes related to early childhood services;*

Standard Operating Procedures and Processes

5. Establish and update, as necessary, the standard operating principles and scope of the Prenatal-Grade 12 Data Governance Program;
6. Establish short- and/or long-term Data Stewards Workgroups, which may be comprised of both state agency and non-state agency subject matter experts as needed (e.g., database administrators, security and privacy experts, and researchers and analysts) to analyze technical issues that arise, advise the Data Governance Council of concerns and recommended solutions, resolve issues within their domain, and implement policies and plans approved by senior leadership;
7. Ensure transparent privacy, confidentiality, and security standards and practices with regard to data storage, access, use, and dissemination in accordance with all applicable state and federal laws and regulations;

8. Establish standard operating procedures for periodic review of the data governance program procedures and processes in order to ensure that they remain efficient and effective; that mission/purpose/scope statements reflect current state and agency priorities; and that the program continuously meets stakeholder needs;
9. Establish program and committee charters that describe expected roles and responsibilities for Data Governance Program partner organizations and representatives, and that establish a review and enforcement process to address non-compliance with expectations;

Interagency Sharing, Analytics and Dissemination

10. Establish the infrastructure, policies, and processes for interagency data sharing, analyses and reporting;
11. Identify sets of data elements that can be gathered and shared from each data-sharing partner organization;
12. Coordinate and implement agreed upon data sharing, storage, analysis, access, and use protocols and processes that maximize efficiency and the security of each partners' data and resources based on the recommendations of the Data Stewards Workgroup and the Data Governance Council's review;
13. Develop timely and appropriate processes for disseminating analytical results; for example, utilizing Vermont Insights, agency websites, interagency reports or files for research partners;
14. Develop processes for receiving, reviewing, prioritizing and responding to interagency policy questions and data requests;
15. Identify and evaluate the necessary resources (e.g., staff, technology, funding) to support the work of the Data Governance Program, activities and products;
16. Develop a mapping process to align data from multiple sources to a common data dictionary;

Analytic Priorities

17. Identify, facilitate and examine the feasibility of already agreed upon and emerging interagency analytical priorities (e.g., policy, research and data questions) by evaluating associated timelines, logistics, and resource availability and agency commitments and make recommendations to agency leadership;

Miscellaneous
18. Attend to other items as necessary.

PRENATAL-GRADE 12 DATA GOVERNANCE PROGRAM OPERATING PRINCIPLES
Insert operating principles here once developed