KDE DATA GOVERNANCE (0001)

Policy Type: Data  
Title: KDE Data Governance

Policy Number: 0001  
Effective Date: March 1, 2009

Responsible Party for Policy Implementation: Commissioner  
Applicability: (personnel complying with policy)  
KDE Agency

Revision History

<table>
<thead>
<tr>
<th>Version</th>
<th>Date of Issue/Update</th>
<th>Author(s)</th>
<th>Brief Description of Revision</th>
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<tr>
<td>1.0</td>
<td>1/21/09</td>
<td>Data Policy Committee</td>
<td>Original policy</td>
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<td>1.1</td>
<td>2/2/09</td>
<td>Data Policy Committee</td>
<td>Definition revisions</td>
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<tr>
<td>1.2</td>
<td>1/29/10</td>
<td>Data Policy Committee</td>
<td>Data Policy Program Coordinator language</td>
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<td>1.3</td>
<td>1/28/11</td>
<td>Data Policy Committee</td>
<td>Updated to reflect new governance structure – Approved</td>
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<td>1.4</td>
<td>1/23/2015</td>
<td>Data Governance Committee</td>
<td>Updated to include selected Data Policy Committee Charter information and streamlined data governance structure</td>
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Review/Approval

<table>
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<th>Approval</th>
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<tr>
<td>Data Governance Committee - Review</td>
<td>4/6/2015</td>
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<tr>
<td>Information and Knowledge Core Process Team - Review</td>
<td>4/23/2015</td>
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<tr>
<td>Chief Information Officer/KIDS Associate Commissioner - Approval</td>
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If you have questions about this document, contact KDE’s chief data officer at 502-564-2020.
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Authority
If, at any time, a portion of this policy conflicts with a state law or regulation that has jurisdiction over the Kentucky Department of Education (KDE) and/or Kentucky school districts, the law or regulation shall take precedence over that portion of the policy. The rest of the policy shall remain in effect.

The Data Governance Committee operates under the authority of the Information and Knowledge Core Process Team (Core Process Team) and KDE Chief Information Officer (CIO). The CIO and Core Process Team mandate data governance policies approved by the Data Governance Committee.

Purpose and Scope
The Data Governance Policy further defines, based on the Master Plan, the KDE’s structure for data governance including critical roles, decision-making authority, responsibilities and associated activities, and accountability of individuals and groups that encounter enterprise data assets.

The provisions of this policy apply to all KDE agency personnel, including employees, temporary staff, contractors and third-party vendors involved with KDE data systems. All KDE personnel shall support, participate and promote KDE’s data governance policies and processes.

Vision
Our vision is to ensure stakeholders have access to timely, consistent and accurate data resulting in quality data-driven decisions affecting student learning. The KDE recognizes that decisions are only as good as the data on which they are based. To transform data into information to facilitate wise decision-making, enterprise systems users and managers of K-12 data need a clear understanding of data definitions, data and process ownership and authority, accountability, security, and reporting needs and requirements, as well as the processes and timelines around each. This policy involves stakeholders throughout KDE to address those needs. Data collected, stored, processed and disseminated by the KDE are agency resources and must be managed from an enterprise perspective.

Mission
Our mission is to improve data accuracy, usability, timeliness and security while meeting the needs of all education stakeholders.

Guiding Principles
1. Ensure that proper data use and management are integral in KDE’s administration of every day services.
2. Establish clear high-level, agency-wide sponsorship of data governance and integrate accountability for successful data management throughout all levels of the agency.
3. Establish data stewards and data controllers by identifying those people/positions within each program or office who are accountable for the creation, definition, security and integrity of data assets and have day-to-day responsibility for program data collection and use. It is essential that these individuals be respected, influential and subject matter experts within the organization.

4. Incorporate data steward activities into the regular, day-to-day aspects of data stewards’ and data controllers’ jobs. In most cases, data steward is not a job-title or a new position; data stewardship is one of the responsibilities of a person’s position.

5. Establish protocols that respect a distinction between the ability to collect and/or provide data and the authority to collect and/or provide data. “Can we? Should we?”

6. Promote a culture of data quality that includes inspection and validation of key data elements.

7. Establish agency policies for high-level data matters and provide guidelines to support consistent implementation.

8. Establish data access protocols that legitimize the need for access to data sets while protecting confidentiality and security of data. Data access protocols will outline needed authorization of data use.

9. Establish data disclosure protocols that guide disclosure of data from education records to third parties, such as researchers, contractors and others.

10. Invest the necessary agency support to make data governance efforts successful.
KDE Data Governance Structure

Key Roles
The KIDS Core Process Team, chief information officer and chief data officer have responsibility for day-to-day operational management and decision making for the agency’s enterprise data.

Data Governance Committee members and alternates will be appointed by each associate commissioner and shall serve indefinitely. If a member terminates from the committee, the appropriate associate commissioner shall appoint, within a reasonable amount of time, a replacement. The Data Governance Committee provides input to the chief data officer and chief security officer.

The KDE chief security officer has responsibility for oversight of day-to-day security for the agency’s enterprise data.

The chart below illustrates the composition of key roles and groups that share responsibility for KDE’s data governance.

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<thead>
<tr>
<th>Key Roles and Groups</th>
<th>Composition</th>
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<tbody>
<tr>
<td>Information &amp; Knowledge Core Process Team (referenced as “Core Process Team”)</td>
<td>Agency leadership including KIDS Associate Commissioner/Chief Information Officer, Associate Commissioners (or Designees) and District CIO Representatives</td>
</tr>
<tr>
<td>Chief Information Officer</td>
<td>Office of KIDS Associate Commissioner</td>
</tr>
<tr>
<td>Chief Data Officer</td>
<td>Enterprise Data Division Director</td>
</tr>
<tr>
<td>Chief Security Officer</td>
<td>KDE Security Program Manager</td>
</tr>
<tr>
<td>Data Governance Committee</td>
<td>One data controller representative from each KDE office</td>
</tr>
<tr>
<td>Data Stewards</td>
<td>Expert on an assigned data asset</td>
</tr>
<tr>
<td>Data Controller</td>
<td>Lead data steward for each office and member of Data Governance Committee</td>
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</table>

Roles and Responsibilities
**Associate Commissioner**: provides resources for implementation of approved policies. An associate commissioner has senior-level authority for all aspects of data activities for his/her respective office and program areas and has primary responsibility to provide a management commitment and vested interest in the decisions affecting enterprise data.

**Chief Data Officer (CDO)**: primary KDE point person for data availability, reporting, and data quality initiatives. CDO chairs the Data Governance Committee. The CDO manages or coordinates data initiatives with partner agencies and the vendors used in completing enterprise data activities. The CDO escalates unresolved data issues to the CIO and Core Process Team. The CDO coordinates a cross-office relationship among data governance adherents. The CDO monitors the development and maintenance of the KDE Enterprise Data Dictionary, data collections and data reporting events.

**Chief Information Officer (CIO)**: senior executive responsible for KDE information technology and systems supporting enterprise goals. The CIO has decision-making authority for enterprise data matters and oversight in the development and implementation of policies.

**Chief Security Officer (CSO)**: primary KDE point person responsible for security of information in both physical and digital form.

**Data Controller**: an individual assigned to serve as lead data steward/controller for a KDE Office. It is essential that a data controller be respected, influential and a subject matter expert. Each data controller represents his/her KDE office as member of the Data Governance Committee. In conjunction with his/her respective associate commissioner, the data controller ensures that office personnel are trained on KDE data governance policies and implementation guidelines, FERPA requirements, data ethics, data security and best practices and that personnel perform their duties accordingly. Each data controller is responsible for ensuring that data assets under the jurisdiction of his/her respective office are assigned to a data steward.

**Data Controller Alternate (Backup)**: an individual assigned to serve as alternate (backup) for his/her respective office’s data controller. It is essential that the alternate is qualified and prepared to assume the duties of the data controller at any time. In the absence of the data controller, the alternate will represent the office as a member of the Data Governance Committee.

**Data Governance Committee**: oversees data projects and data quality initiatives, systematically creates and maintains enterprise data policies, an agency-wide training plan and communication plan, and defines the roles, responsibilities, and guidelines for collecting, using and reporting data. This includes, but is not limited to, the adoption of common definitions, standards, processes, practices, implementation guidelines and products. The Data Governance Committee resolves data governance issues affecting agency data. The Data Governance Committee makes determinations to approve or deny any proposed or requested change for any enterprise system, and any change, addition, or removal of a data asset. In the event the Data Governance Committee does not reach agreement on an issue, the data controller responsible for the data asset will present the proposal or request to the Core Process Team.
Data Steward: an individual assigned responsibility for a data asset, which can be a data element, data field or data collection. The data steward should be the expert on the assigned data asset and is responsible for hands-on work at KDE related to the assigned data asset. The data steward will serve as the operations point of contact for the data asset’s references in the KDE Enterprise Data Dictionary and the data asset’s metadata contained within the KDE Enterprise Data Dictionary. A data steward has day-to-day responsibilities including:

- maintain an up-to-date data definition and/or formula,
- identify the data collection frequency and date(s),
- Analyze the impact of state and federal laws and regulations, and policies on the collection and reporting of assigned data asset,
- provide recommendations on required/target level of accuracy and inspect data to ensure it meets the established level of accuracy,
- document reporting requirements and date(s),
- maintain an up-to-date data standard for the assigned data,
- document ad hoc reports and custom reports for validation,
- communicate with and support district and KDE staff on the appropriate/allowable use of the data,
- inspect the data for quality, completion and validation in accordance with specified collection periods and at end of year,
- respond to questions concerning the data asset and to inquiries on appropriate/allowable data use,
- promote data use for data driven decision making, and
- adhere to FERPA requirements and other best practices for data ethics and data security.

Enterprise Data Division: champions sharing of information and systems that support data sharing. The team promotes availability, sharing and maximizing the quality and use of agency data. The team is responsible for management of the KDE Data Dictionary and master reporting schedule. Liaison with data stewards for dealing with systematic data quality issues that cross all agency and district data systems.

Information & Knowledge Core Process Team: reviews and contributes to data policies and resolves issues when the Data Governance Committee cannot reach consensus or when consulted by CIO. Also oversight of information technology (IT) and data strategic planning, application portfolio management, project review, prioritization and approval.
Appendices

(Appendices listed will be hyperlinked to the documents.)

Acronym Reference

Definitions

Data Request Form

KDE Data Governance Organizational Chart

MOU – Studies

MOU – Audit/Evaluation

KDE Data Controllers

KDE Data Stewards

KDE Employee Affidavit of Nondisclosure

KDE Policies

Data Access Policy

Data Security Policy