Self-Assessment: Managing Your Own Data & Data Sharing

This self-assessment focuses on best practices in data governance and management. Strong data governance and management are key factors in securing data access to measure outcomes of equitable pathways programs.

Read each question as it relates to your organization's data practices.

For each "no" response, brainstorm possible solutions e.g., What do you need? How can partner organizations help?

Data Governance & Data Security

Based on the Privacy Technical Assistance Center's Data Governance Checklist (June 2015)1

Data Security & Risk Management Needs	Yes	No
Has a comprehensive security framework been developed, including: administrative, physical, and technical procedures for addressing data security issues (e.g., data access and sharing restrictions, strong password management, regular staff screening and training, etc.)?	☐	☐
Has a risk assessment been undertaken, including: an evaluation of risks and vulnerabilities related to both intentional misuse of data by malicious individuals (e.g., hackers) and inadvertent disclosure by authorized users?	☐	☐
Is a plan in place to mitigate the risks associated with intentional and inadvertent data breaches?	☐	☐
Does the organization regularly monitor or audit data security?	☐	☐
Have policies and procedures been established to ensure the continuity of data services in an event of a data breach, loss, or other disaster (i.e., a disaster recovery plan)?	☐	☐
Are policies in place to guide decisions about data exchanges and reporting, including: sharing data (whether as individual records containing PII[2] or as de-identified aggregate reports) with educational institutions, researchers, policymakers, parents, and third-party contractors?	☐	☐
When sharing data, are appropriate procedures, such as sharing agreements, put in place to ensure that any PII remains strictly confidential and protected from unauthorized disclosure? Are data sharing agreements are allowed under local, state, and federal privacy laws and regulations, such as FERPA[3]?	☐	☐
Are appropriate procedures implemented to ensure that PII is not inadvertently disclosed in public aggregate reports and that the organization's data reporting practices remain in compliance with applicable local, state, and federal privacy laws and regulations, such as: rounding, cell suppression, and randomized identifiers	☐	☐
Are stakeholders, including eligible students or students' parents, regularly notified about their rights under applicable federal and state laws governing data privacy?	☐	☐

[1] United States Department of Education. "Data Governance Checklist," June 2015. https://studentprivacy.ed.gov/sites/default/files/resource_document/file/Data%20Governance%20Checklist_0.pdf.

[2] Personal Identifying Information (PII) includes, but is not limited to: name, birthdate, address, social security number or any demographic characteristic with fewer than ten members total.

[3] Family Educational Rights and Privacy Act [FERPA] is a Federal law that protects privacy of student education records and impacts schools, partner organizations, and third-parties who might access the data. https://www2.ed.gov/policy/gen/guid/fpco/ferpa/index.html

Self-Assessment: Managing Your Own Data & Data Sharing

Standard policies and procedures	**Yes**	**No**
Have policy priorities affecting key data governance rules and requirements been identified, and has agreement (either a formal agreement or a verbal approval) on priorities been secured from key stakeholders?	☐	☐
Have standard policies and procedures about all aspects of data governance and the data management lifecycle, been clearly defined and documented, including: collection, maintenance, usage and dissemination, and destruction?	☐	☐
Are policies and procedures in place to *ensure* that all data are: collected, managed, stored, transmitted, used, reported, and destroyed in a way that preserves privacy and ensures confidentiality and security in compliance with FERPA?	☐	☐
Has an assessment been conducted to ensure the long-term sustainability of the proposed or established data governance policies and procedures, including: adequate staffing, tools, technologies, and resources?	☐	☐
Does the organization have a written plan outlining processes for monitoring compliance with its established policies and procedures?	☐	☐
Have data governance policies and procedures been documented and communicated in an open and accessible way to all stakeholders, including: staff, data providers, program participants, and the public (e.g., by posting them on the organization's website)?	☐	☐

Data records management	**Yes**	**No**
Have mechanisms been put in place to de-identify PII data whenever possible (e.g., by removing all direct and indirect identifiers from PII)?	☐	☐
Has the organization established and *communicated* policies and procedures for handling records throughout all stages of the data lifecycle, including: acquiring, maintaining, using, and archiving or destroying data?	☐	☐

Decision-making authority	**Yes**	**No**
Has an organizational structure with different levels of data governance (e.g., executive, judicial, legislative, administrative, etc.) been established, and roles and responsibilities at various levels specified (e.g., governance committee members, technology leaders, data stewards, etc.)?	☐	☐
Have data stewards (e.g., program managers) responsible for coordinating data governance activities been identified and assigned to each specific domain of activity?	☐	☐
Are data stewards' roles, responsibilities, and accountability for data decision making, management, and security clearly defined and communicated to all relevant stakeholders?	☐	☐
Do data stewards possess the authority to quickly and efficiently correct data problems to protect privacy and confidentiality (while still ensuring that their access to PII is minimized)?	☐	☐

Self-Assessment: Managing Your Own Data & Data Sharing

Inputs for Building Your Equitable Pathway: Where are your gaps?

Based on "Centering Racial Equity Across the Data Life Cycle" from Policy & Practice (August 2020)[4]

For each section, elect the positive practice(s) that your organization is actively engaged in.
For practices that your organization does not currently engage in, what is needed to activate this?

Planning for Equitable Pathways – Positive Practices & Work in Action

☐	Including diverse perspectives (e.g., community members with lived experiences and agency staff who understand the data) on planning committees	
☐	Building capacity for researchers, administrators, and community participants to work together on setting agenda	
☐	Researching, understanding, and disseminating history of local policies, systems, and structures involved, including past harms and future opportunities	
☐	Lifting up research needs of the community to funders; helping shape funding strategy with funders to support community-driven research	

Work in Action: Broward County, FL demonstrates how using Participatory Action Research in planning can infuse racial equity throughout the data life cycle. Broward County's data collaborative intentionally involves system participants in governance, research, evaluation, and solution creation to address racial, economic, and social/spatial gaps between predominantly White researchers and policymakers, and those using public services. In planning, Broward County is creating an integrated data system that supports sharing strengths-based stories about the community and using data to co-create system and policy improvements.[5]

Data Collection for Equitable Pathways – Positive Practices & Work in Action

☐	Adhering to data management best practices to secure data as they are collected—specifically, with carefully considered, role-based access	
☐	Including agency staff and community stakeholders in defining which data should be collected or reused	
☐	Collecting only what is necessary to your context	
☐	Strong efforts to support metadata documentation, including key dimensions of metadata such as: description, provenance, technical specifications, rights, preservation, citation	
☐	Including qualitative stories to contextualize quantitative data	

Work in Action: The Allegheny County, PA initiative to collect sexual orientation, gender identity, and gender expression (SOGIE) data in child welfare validates an intersectional approach to centering equity in data collection. For this effort, the Department of Human Services had to address privacy and data security concerns surrounding

[4] The Toolkit is available in its entirety through the Actional Intelligence for Social Policy (AISP):
Hawn Nelson, A., Jenkins, D., Zanti, S., Katz, M., Berkowitz, E., et al. (2020). *A Toolkit for Centering Racial Equity Throughout Data Integration.* Actionable Intelligence for Social Policy. University of Pennsylvania. https://aisp.upenn.edu/resource-article/a-toolkit-for-centering-racial-equity-throughout-data-integration/

[5] Zanti, S., Katz, M., Hawn Nelson, A. (2020). "Centering Racial Equity Across the Data Life Cycle," *Policy & Practice*. August 2020. https://aisp.upenn.edu/wp-content/uploads/2020/08/PP_August2020_RacialEquity_AISP.pdf

youth SOGIE data, the implications of sharing these data with external stakeholders, and the complexities and costs of updating information technology (IT) systems. Additionally, the department engaged with IT staff to ensure they knew the importance of these changes in order to mitigate harm during the design process.

Data Access for Equitable Pathways – Positive Practices & Work in Action

	For "Open Data"	
☐	Open data that have been identified as valuable through engagement with individuals represented within the data	
☐	Clear data release schedules and information on where to go and how to access data once they are released	
	For "Restricted Data"	
☐	Adhering to data management best practices for data access, including clear data destruction parameters (if applicable) following use	
☐	Utmost care given to de-identification and anonymization of data prior to release	
☐	Accessible data request process with clear policies and procedures for submitting a request and how requests are evaluated	
	For "Unavailable Data"	
☐	Clear documentation of why data are unavailable (e.g., specific statute, legislation, data quality explanation, data are not digitized, undue burden in data preparation)	

Work in Action: The *Birth through Eight Strategy for Tulsa* (BEST) data collaborative in Tulsa, OK provides an example of balancing access to integrated data while protecting privacy and data security. The collaborative was formed to address race, equity, and service overlap challenges in the community and brought together data from 32 programs across local government, nonprofit, private-sector, and philanthropic organizations to do so. BEST piloted a platform utilizing privacy-preserving record linkage that supported data integration while keeping individual and organizational data private and secure. The platform's use of cryptographic technology allows researchers to integrate data more quickly, at lower cost, while enhancing privacy for individuals and organizations.