

Data Governance and Management

**Updated
November, 2012**

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Overview

Accurate, relevant and timely data can inform policy makers and educators in setting goals, targeting interventions, identifying strengths, making policy, and monitoring progress. Accurate, relevant and timely data requires that the appropriate people have access to the data they need when they need it and know how to effectively and accurately report the data. This must also be balanced by privacy concerns and proper data use.

The Utah State Office of Education (USOE) has developed a data governance structure based on proven data governance practices and educational data needs. The USOE data governance structure centers on the idea that data is the responsibility of all USOE sections and that data driven decision making is the goal of all data collection, storage, reporting and analysis. Data driven decision making guides what data is collected, reported and analyzed.

While data governance works best when all employees take an interest in data and data issues, specific individuals are assigned to guide and facilitate proper data use. Each section at USOE assigns at least one data steward to oversee how data specific to that section is defined, collected, stored, shared and reported. Data does not exist in a vacuum, but is only properly used within context. While Data & Statistics and IT staff have knowledge about data, analysis and data systems, they lack the contextual knowledge needed to make policy decisions about the collection and use of data. Good data management requires both an understanding of the data and an understanding of the program or context. Thus, data stewards function as liaisons and bridge the gap that sometimes exists between “data folks” and “program folks”. Data meetings foster collaboration among the USOE sections and between the USOE and Local Educational Agencies (LEAs).

It is important that all data be collected once, have one source system of record, and be shared among all that are authorized and have a need for the data. Reported data should meet the standards of reliability and validity and adhere to established quality control processes. Finally, interpretation and use of reported data should be appropriate to the definitions, the collection, and educational theory surrounding the data.

The following two figures outline the broad data use flow and the overall data governance structure. After which, roles specifically involved in the data governance structure are identified and outlined. Data meetings are also listed and defined. Finally, data flow and data request processes are outlined.

Figure 1:
Data Use Overview

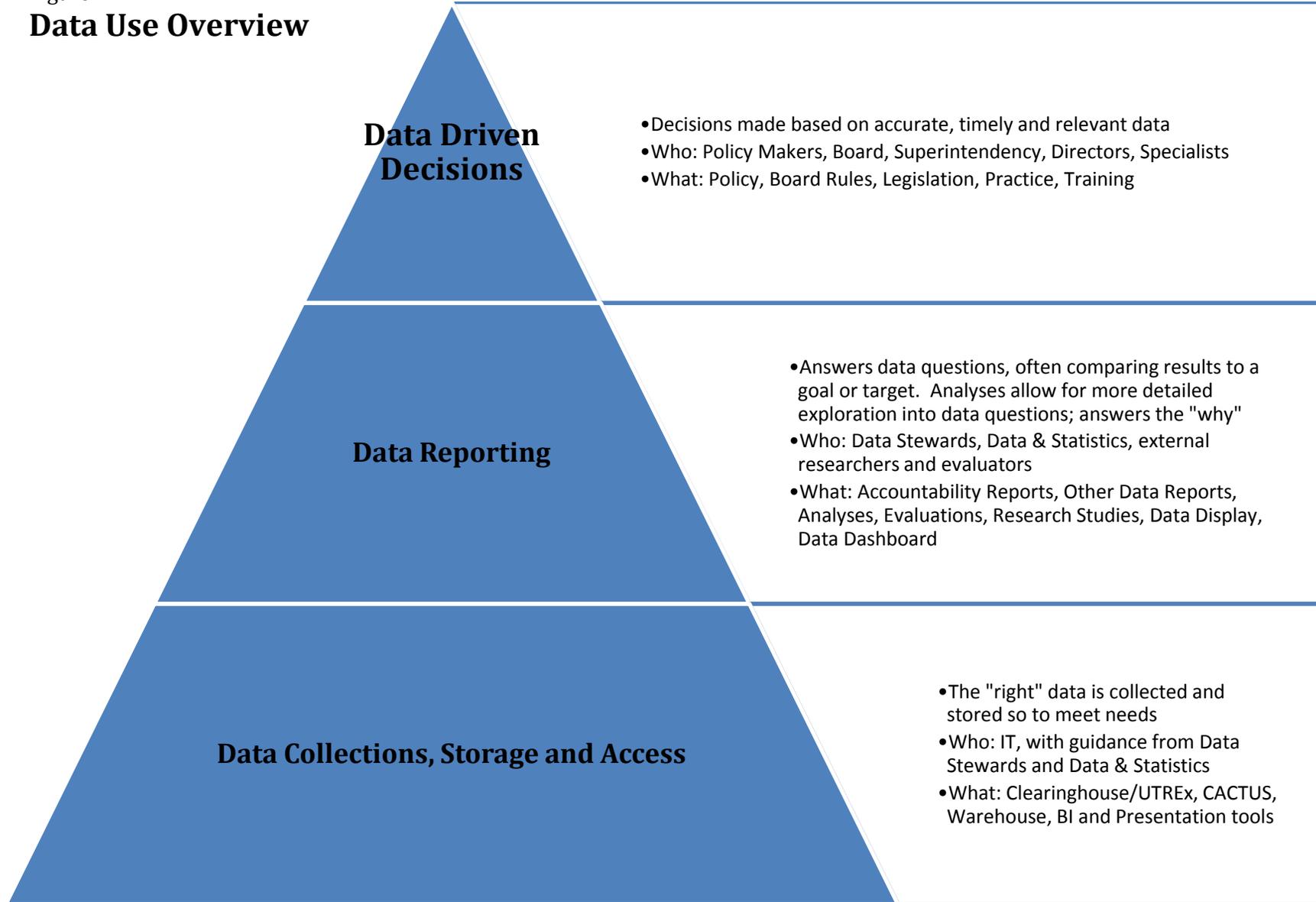
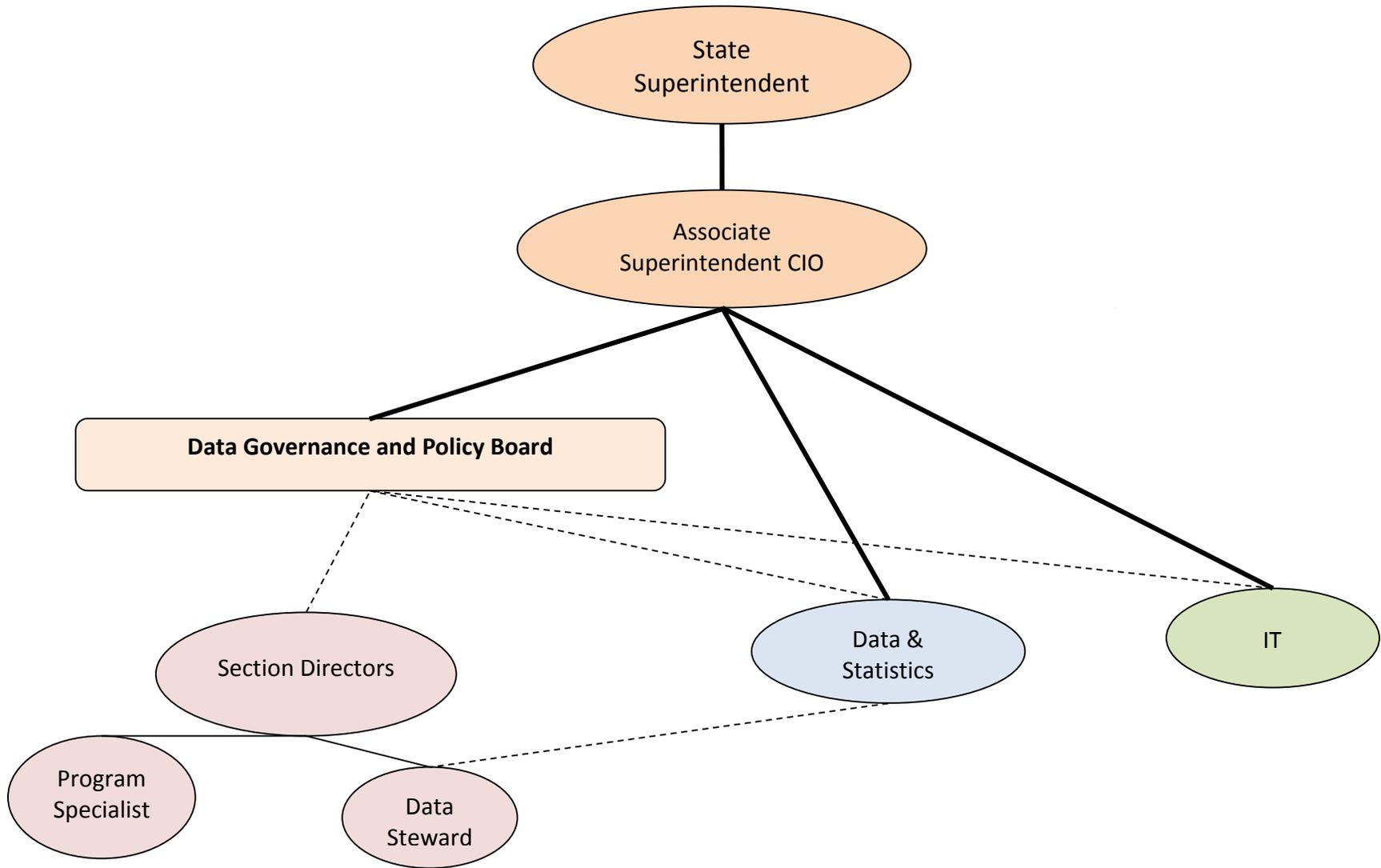


Figure 2:
Overall Data Governance Structure



Data Governance Roles

Associate Superintendent, Student Services and Federal Programs/Chief Information Officer (CIO)

This role is filled by the Associate Superintendent responsible for data reporting, data quality, federal reports and accountability. As CIO, this person is responsible for ensuring that information technology is properly planned for, implemented and effectively maintained to support and enhance business operations and student achievement across all divisions of USOE. S/he also oversees the USOE's technology plan, the management of the organization's data, recommends key technology budget initiatives, provides oversight for the operation and maintenance of the technology infrastructure and applications, ensures proper technology standards are established and followed, monitors service level measures and targets for all technology related support activities, provides project oversight for critical projects and maintains relationships with the local business community and state support agencies.

Data & Statistics Coordinator

The Data & Statistics Coordinator reports directly to the Associate Superintendent over Student Services and Federal Programs. S/he provides leadership for the collection and reporting of data for the USOE. S/he is responsible for the establishing, monitoring, improving and training of the data management and data quality processes and programs for the USOE. In doing this, the Data & Statistics Coordinator coordinates Data Stewards from each section and works closely with IT staff. The Data & Statistics Coordinator also participates in Data Governance meetings in making data policy decisions.

Data & Statistics Section (D&S)

D&S is led by the Data & Statistics Coordinator. D&S fosters collaboration among stakeholders to improve the quality of educational data and to serve the needs of Utah public education; identifies data quality issues and establish and implement policies and procedures to drive accurate reporting of data; defines data presentation and access needs to guide the format of a production layer; produces accurate and timely reports that proactively inform policy and are appropriate to the need and audience; and provide leadership toward innovative data analysis and reporting.

Data Analysts

Data Analysts are part of the D&S section and their task is to improve the quality of the data and to conduct higher level data analyses. Data Analysts perform quality checks data reports, audit data submitted by LEAs, act as data liaisons and build capacity for Data Stewards in data quality. They also conduct major data/statistical projects for the USOE and respond to data needs that span across multiple departments.

Data Stewards

Data Stewards are at the heart of good data governance. They are the link between Data/IT and program areas. Data Stewards are responsible for data content, context, and associated business rules. They must work with D&S and IT to ensure the proper definition, collection, and reporting of the data element for which they are responsible. Data Stewards also must work with their Section Director and Program Specialists in voicing their section's data needs, coordinating data use in their section and responding to data requests from and to their sections (see section on Data Request Process). Each section must appoint a Data Steward to represent that section in terms of data. Data Stewards reside in and are supervised by each section, but are responsible for working with the Data & Statistics Coordinator in discharging their responsibilities. Though an educator license is not required, Data Stewards must have enough program knowledge to understand data

needs, enough authority to make data decisions and function as a data steward, and enough technical/statistical expertise to work with data and understand USOE's data structure.

COGNOS Specialists

USOE currently builds and maintains a data presentation for LEAs that uses COGNOS (called the Data Display). COGNOS Specialists facilitate the use of COGNOS. COGNOS Specialists work with the COGNOS users group and data mentors.

Section Directors

Section Directors are ultimately responsible for data coming from by their respective sections and/or used by them. They assign data stewards. They approve data requests for data owned by their section and data produced by their section. Section Directors attend Data Governance meetings, making data policy decisions.

Program Specialists

Program Specialists' focus on a day to day basis is likely not data. However, Program Specialists are users of data and therefore play an important role in data governance by outlining their data needs and defining data elements for their area. They will do this through their Data Steward. Thus, Program Specialists must work closely with their Data Steward whenever data for their program is being collected or used. They also are responsible for communicating data needs and issues to LEA Specialists and other appropriate external entities. Without input from Program Specialists, data becomes marginalized and less relevant to educational needs and endeavors.

IT Director

The IT Director provides leadership for the planning, implementation and support of information systems, policies and processes for the USOE and works with LEAs on wide-ranging IT initiatives and systems integration. S/He plans and manages the agency technology infrastructure including: computers, printers, firewalls, routers, and dozens of specialized servers with appropriate security, inventory and backup technologies. The IT Director supervises professional IT staff and directs commercial and software acquisitions and development. The IT Director also works closely with the Data Quality Manager in identifying data needs and solutions and participates in Data Governance meetings in making data policy decisions.

Information Technology (IT)

IT does not have a Data Steward, but IT staff works closely with the Data Quality Manager, Data & Statistics and Data Stewards. IT should be informed and a part of all data collections at USOE. IT staff members assist Data Stewards in accessing collected data. IT staff are responsible for the overall agency information technology infrastructure, resources and processes. This includes: all networking hardware and software; all databases and data warehousing; all commercial and custom software applications including their management, development and support; data and IT policies and governance including security, quality and access functions.

MOVEiT Specialists

MOVEiT Specialists are the contact person at USOE for any secure file transfer through MOVEiT. Most often this is a Data Steward or an IT staff member. MOVEiT Specialists certifies that data is applicably transferred and security is appropriately maintained.

Role Matrix Table

Data Governance Activity	CIO	D&S Coordinator	IT Director	Section Directors	Data Analysts	Data Stewards	IT Staff	COGNOS Specialist	Program Specialist
Data Governance									
Establish Data Policy Committees & Boards	X								
Develop Data Governance Policy	X	X							
Approve Data Governance Process	X	X	X	X					
Develop and Approve Data Policy	X	X	X	X					
Assign Data Elements (Stewardship) to Sections	X	X							
Assign Data Elements (Stewardship) within Sections				X					
Identify Data Stewards				X					
Define Data Elements						X			X
Data Reporting									
Identify Research Needs and Data Priorities	X								
Approve Data Requests		X		X					
Respond To Data Requests		X				X			
Work with External Researchers		X			X				
Provide Simple Data Analyses and Reports						X			
Perform More Involved Data Analyses		X			X				
Provide Mechanism for Reoccurring Reports							X		
Quality Check Released Data	X	X	X	X	X	X	X	X	X
Audit Data and Calculations					X	X	X		
Data Collections, Storage, Access									
Identify Data Collection Needs		X		X		X			X
Collect Data							X		
Develop Application Architecture		X	X				X		
Develop Applications							X		
Develop Technology Standards			X						
Define Data Presentation Needs and Elements		X							
Develop/Maintain Data Presentation Framework			X				X		
Develop & Maintain Data Presentation					X		X	X	

Data Governance Groups

Data Governance/Policy Board (DGPB)

Members: Deputy and Associate Superintendents, D&S Coordinator, and all Directors
Meetings: Monthly, Attendance is mandatory
Meeting conducted and facilitated by Associate Superintendent/CIO
Purpose: To resolve the data and process issues and the policy decisions raised by the Data Stewards, the Data Warehouse and CACTUS meetings.

Data Stewards Group Meeting

Members: D&S Coordinator, Data Stewards, Data Analysts, IT Staff, COGNOS Specialists
Meetings: Bi-monthly, Attendance is mandatory
Meeting conducted and facilitated by D&S Coordinator
Purpose: To resolve issues dealing with data reporting, data quality and data processes. Train Data Stewards.

Data Warehouse Group (DWG)/Data Warehouse District

Members: IT Director, IT staff, D&S Coordinator, Data Analysts, Data Stewards, Program Specialists as needed, LEA IT representatives (once a month)
Meetings: Bi-Monthly, Attendance is mandatory
Meeting conducted and facilitated by IT Director
Purpose: To resolve issues dealing with the collection and storing of data in the Warehouse.

Data Technical Meeting

Members: IT staff, D&S Coordinator, Data Analysts, Data Stewards
Meetings: Weekly
Meeting conducted and facilitated by IT and D&S Coordinator
Purpose: To troubleshoot questions about data access.

NAG

Members: IT group and Zone Admins
Meetings: Monthly NAG meeting facilitated by IT group
Purpose: To introduce changes to IT infrastructure and resolve company-wide IT issues.

CACTUS Group Meeting

- Members: IT CACTUS staff, D&S Coordinator, Data Stewards as needed, other agency staff working with CACTUS
- Meetings: Weekly, Attendance is mandatory
Meeting conducted and facilitated by IT Manager over CACTUS
- Purpose: To resolve technical issues dealing with the collection and storing of data in CACTUS.

Data Display Steering Meeting

- Members: Assessment Director, COGNOS Specialists, D&S Coordinator, Data Analyst assigned to COGNOS, IT Director, IT Manager
- Meetings: Monthly
Meeting conducted and facilitated by Assessment Director
- Purpose: To guide direction and purpose of Data Display.

USOE Data and Auditing Group Meeting

- Members: D&S Coordinator, Data Analysts, Finance & Statistics Financial Auditors, USOE Auditor
- Meetings: *Not yet implemented*
Meeting conducted and facilitated by Data & Statistics
- Purpose: To coordinate data auditing efforts. Review auditors' reports. Identify data auditing needs.

District Data Conferences

- Members: IT staff, D&S Coordinator, Data Analysts, Data Stewards, applicable Program Specialists, LEA IT representatives, other applicable LEA representatives
- Meetings: Twice Each Year, Fall and Spring
Meeting conducted and facilitated by IT Director
- Purpose: To coordinate data collections, definitions and practices with LEAs. Inform LEAs of new collections and procedures. Train on data and best practices in handling and using data.

Meeting Matrix Tables

Meeting Participants

Group	Attendees									Notes
	CIO	D&S Coordinator	IT Director	Other Directors	Data Stewards	DQAs	COGNOS Specialists	IT Staff	Program Specialists	
DGPB	L	R	R	R						
DSG		L	O		R	R	R	O		
DWG		R	L		R*	R		R	O	
CACTUS Group		O	O		R*	R		R	R*	
Warehouse Tech		R			O	O	O	R		
Data Conferences	O	R	L	O	R	R		R	O	
Data Display Steering Committee		R	R	R*			R	R		Lead by Assessment & Accountability

L = Leads Group

R = Required Attendee

*R = Required for Relevant Sections

O = Optional Attendee

Meeting Activities

Data Governance Activity	Group Responsible for Data Governance Activities						
	DGPB	DSG	DWG	CACTUS Group	Warehouse Tech	Data Conferences	Data Display
Identify data issues		X	X	X	X		X
Develop data governance policy	X						
Sponsor the Data Governance process	X						
Review data reporting policies		X					
Review data collection and management policies			X	X			
Approve data policies	X						
Operationalize data policies		X	X	X			X
Establish working groups to resolve data issues	X	X	X				
Discuss/propose new data collections			X	X	X		
Approve new data collections	X			X			
Review and approve Application Architecture	X		X				
Approve new databases and applications	X						
Develop/review data element standards		X	X	X	X		
Approve data element standards	X						
Develop Technology standards			X	X			
Approve Technology standards	X						
Train on Data Usage		X			X		X

Data Flow

The USOE collects and reports on vast amounts of data. The data flow outlined below creates mechanisms for data collected to be stored and used in such a way as to produce accurate, relevant and timely results. Each layer is important.

Data Collection

Data should be collected once and have one source system of record. Data is collected and received by the USOE through multiple sources. Most student non-assessment data is collected from LEAs through the USOE Data Clearinghouse. There are other data sources, such as state assessment data through the state testing system, educator data through CACTUS, program data collected through mechanisms managed by Program Specialists, and external data such as ACT sent by external entities. While data is collected and received through multiple sources, all data collections and receipts should be supervised by IT.

Formal Collections

Wherever possible, data should only be collected through existing formal collection procedures. Typically, this will mean the Data Clearinghouse. For any new data collections or changes to existing data collections Program Specialists and their Data Steward must work with IT. Ideally, any changes or additions to current data collections must be scheduled a minimum of 18 months before the data is needed. These changes and additions should be brought to the Data Warehouse Group meeting as soon as they are known. The section's Data Steward is responsible for working out the details of the collection and its format. Any new data collections or changes to current data collections must be justified, meaning there must be a clear purpose and need for the data.

Ad hoc Collections

While formal collections are norm, there are rare cases when data cannot be collected formally. For example, if a Federal or state mandate requires data that the USOE report data not previously collected and not enough time is given to collect the data through formal collections, an ad hoc collection may be done until the data can be collected through formal collections. No ad hoc collections should be undertaken without support from IT and the section's Data Steward. Further, data from these ad hoc collections should not be stored on an individual's computer.

Data Storage

Data should never solely reside on an individual's computer. Wherever possible, data collected and received by the USOE is stored in a central location, the data warehouse. The warehouse contains longitudinal data from and allows the various collected data to be linked together for a more robust picture of Utah public education. Access to the raw data elements in the warehouse is generally limited to IT. Data Analysts and Data Stewards may have access to the raw data as needed.

Data Access

Data that is collected and stored must be made assessable to all data users in a format ready for data use specific to their needs.

Production Layer

Data tables use the data dictionary to convert raw data into meaningful data sets. The production layer manages the flow of information from the staging part of the data warehouse to an interface that makes it easier for Data Stewards to view and work with the data. The development of this layer is the responsibility of IT and Data & Statistics. Data &

Statistics, with input from Data Stewards, defines the business rules used. Data & Statistics communicates needs to IT, who designs the structure. The presentation layer will draw from the tables created in the production layer. Access to the production layer will be extended to Data Stewards and Data Analysts to develop non-standard data reports and analyses.

Presentation Layer

The presentation layer contains data in a format for easy access and use for general data users. USOE currently builds and maintains a data presentation layer that uses the reporting tool, COGNOS. This layer has been named the Data Display. The Data Display contains dynamic reports that can be used by any educator with very little to no training. The Data Display also contains cubes that allow for more flexibility in data reporting. While cubes are easier to use than the tables in the production layer, they require training and are to be used primarily by Data Stewards.

The Data Display is developed by COGNOS specialists and Data & Statistics, with help from IT.

There are other data presentation tools used by USOE, including static reports in programs such as CACTUS. These are built by IT to fill specific needs for commonly needed reports.

Data Use

There are three levels of data use—strategic data reporting, data analysis and data driven decisions. Data that is strategically measured and then analyzed and/or researched for deeper understanding will lead to appropriate data driven decisions.

Strategic Data Reporting

Strategic data reporting answers many of the “what” or “how many” types of questions. For example, data is reported on how many science teachers are in Utah or if more students are proficient on the Pre-Algebra CRT this year than were proficient last year. Strategic data reporting works best when the data is measured against a goal. Data at this level can be presented in a variety of ways, including a direct answer to a question, a table, a data file, and graphically. The data dashboard and data display present data at this level.

Data at the strategic level is largely the role of Data Stewards. As data stewards reside in program areas, they can provide the contextual knowledge necessary for strategic data use.

Data Analysis

Data analysis goes beyond reporting data. The reported data at the strategic level often leads to further and deeper questions. For example, why did a school not meet a goal or why are a certain group of students improving and others not? These types of questions are addressed by data analysis. At this level analyses are performed to answer the “why” type questions. Analyses are also performed to synthesize and model the data in order to highlight useful trends and correlations and identify other variables impacting results.

While data stewards may do analyses as needed, data analysis and data audits are the responsibility of Data & Statistics.

Data Audits

At times the “why” questions leads to questions about the validity and reliability of the data itself. Thus, at this level data audits may be performed to ensure the

strategic data reporting is valid. Along with Data Stewards, Data & Statistics is responsible for the quality of the data.

Research

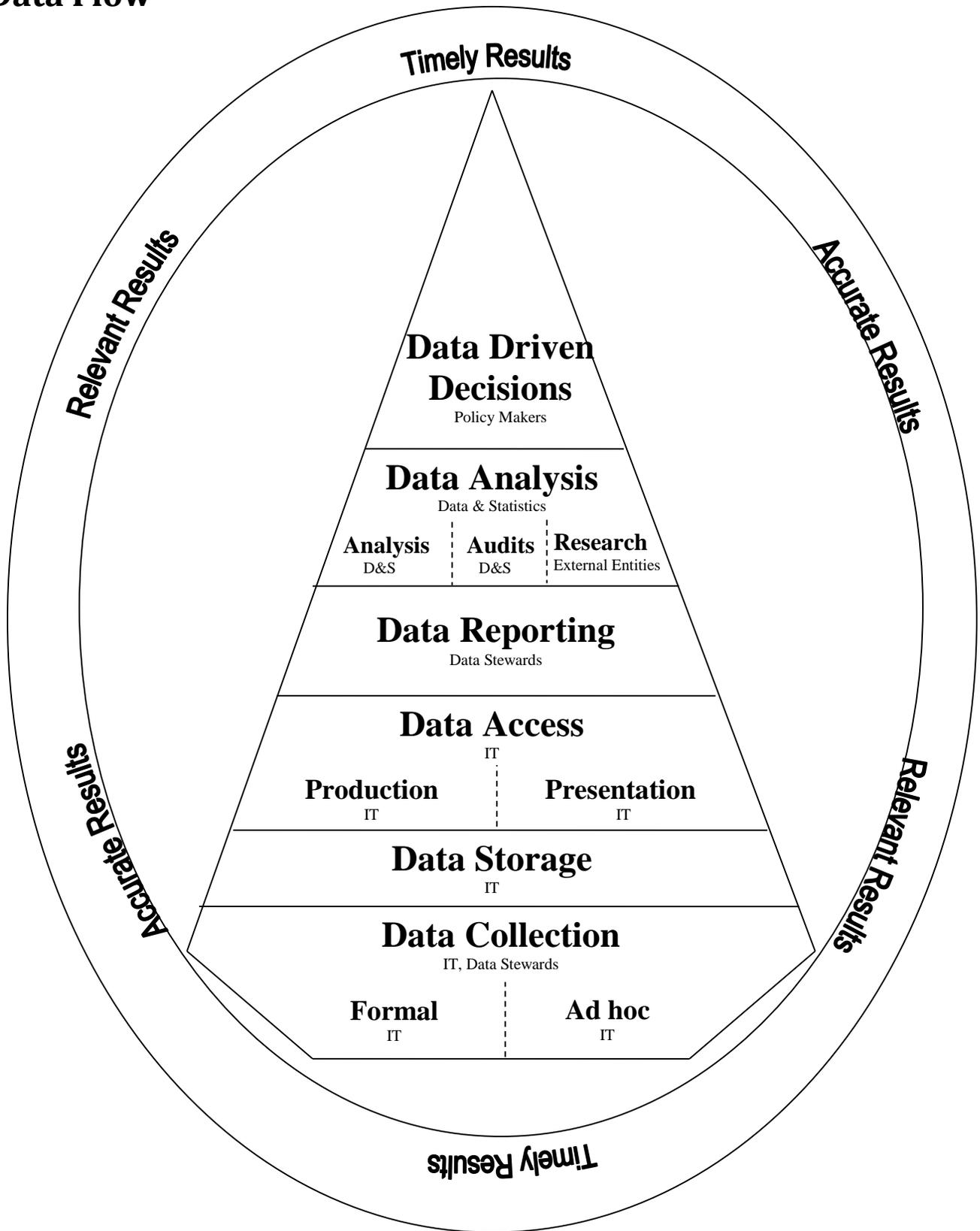
Research is a subset of the data analysis level. Analyses done by the USOE may spark interest for further study that is beyond the scope of the USOE's resources. Thus, it is in the interest of the USOE to work with researchers at Utah Universities and other reputable research institutions to answer these questions.

Data Driven Decisions

Data is not useful unless put into action. Data driven decisions should be the ultimate outcomes of all data collected, stored, accessed and used. Data driven decisions use data from the strategic, analytic and research levels to inform the decision making process for policy changes.

IT, Data Stewards, and Data & Statistics provide the data but do not decide policy. Data Stewards and Data & Statistics guide correct interpretation of the data, but application of the data is a role for policy and decision makers.

Figure 3:
Data Flow



Data Quality

Data quality is achieved when information is valid for the use to which it is applied, is consistent with other reported data and users of the data have confidence in and rely upon it. Good data quality does not solely exist with the data itself, but is also a function of appropriate data interpretation and use and the perceived quality of the data. Thus, true data quality involves not just those auditing, cleaning and reporting the data, but also data consumers.

Data quality at USOE is addressed in six areas.

Data Governance Structure

The USOE data governance policy is structured to encourage the effective and appropriate use of educational data. The USOE data governance structure centers on the idea that data is the responsibility of all USOE sections and that data driven decision making is the goal of all data collection, storage, reporting and analysis. Data driven decision making guides what data is collected, reported and analyzed.

Data Requirements and Definitions

Clear and consistent data requirements and definitions are necessary for good data quality. On the data collection side, the USOE communicates data requirements and definitions to LEAs through the Data Clearinghouse Update Transactions documentation (see <http://www.schools.utah.gov/computerservices/Data-Clearinghouse.aspx>). The USOE also communicates with LEA IT staff regularly, at monthly Data Warehouse Group meetings and at biannual Data Conferences. Where possible, USOE program specialists are invited to these meetings and the same guidance is given to the appropriate LEA program directors. On the data reporting side, the production and presentation layers provide standard data definitions and business rules. Data Stewards coordinate data releases through the Data Stewards Group meetings. All data released includes relevant data definitions, business rules, and are date stamped. Further, Data & Statistics produces documentation, trainings and FAQs on key statistics and reports, such as AYP, graduation rate and class size.

Data Collection

Data elements should be collected only once—no duplicate data collections are permitted. Where possible, data is collected at the lowest level available (i.e. at the student/teacher level). Thus, there are no aggregate data collections if the aggregate data can be derived or calculated from the detailed data.

For all new data collections, USOE provides to LEAs clear guidelines for data collection and the purpose of the data request. The USOE also notifies LEAs as soon as possible about future data collections. Time must be given to LEAs in order for them to begin gathering the data needed. Data definitions and guidelines more clear, respond to district concerns quickly

Data Auditing

Data & Statistics Data Analysts perform regular and ad hoc data auditing. They analyze data in the warehouse for anomalies, investigate the source of the anomalies, and work with IT and/or LEAs in explaining and/or correcting the anomalies. Data Analysts also work with School Finance to address findings from the Auditors.

Quality Control Checklist

Checklists have been proven to increase quality. Therefore, before releasing data, Data Stewards and Data Analysts must successfully complete the data release checklist in three areas: reliability, validity and presentation. The checklist is as follows.

Reliability (results are consistent)

1. Same definitions were used for same or similar data previously reported **or** it is made very clear in answering the request how and why different definitions were used
2. Results are consistent with other reported results **or** conflicting results are identified and an explanation provided in request as to why is different
3. All data used to answer this particular request was consistently defined (i.e. if teacher data and student data are reported together, are from the same year/time period)
4. Another USOE data steward could reproduce the results using the information provided in the metadata

Validity (results measure what are supposed to measure, data addresses the request)

5. Request was clarified
6. Identified and included all data owners that would have a stake in the data used
7. Data owners approve of data definitions and business rules used in the request
8. All pertinent business rules were applied
9. Data answers the intent of the request (intent ascertained from clarifying request)
10. Data answers the purpose of the request (audience, use, etc.)
11. Limits of the data are clearly stated
12. Definitions of terms and business rules are outlined so that a typical person can understand what the data represents

Presentation

13. Is date-stamped
14. Small n-sizes and other privacy issues are appropriately handled
15. Wording, spelling and grammar are correct
16. Data presentation is well organized and meets the needs of the requester
17. Data is provided in a format appropriate to the request
18. A typical person could not easily misinterpret the presentation of the data

Data Training

Data Stewards meet together bi-monthly at the Data Stewards Group meetings to discuss data reporting and to train on USOE data and good data use. In these meetings (and other ad hoc trainings) Data Stewards train each other about specific data elements (such as definitions, business rules, collections, reports). Data Stewards also are trained on the various data reporting tools (such as SPSS, COGNOS, and InfoMaker) and on good data reporting techniques.

Handling Data Errors

The USOE data governance process minimizes errors in data reporting. However, errors will still exist. Errors in reported data will be handled on a case by case basis, depending upon the circumstance. The impact of the error must be weighed against the impact of correcting the error. The following considerations will guide how to handle any errors in reported data.

Errors in data submitted by LEAs are best found and fixed before collection deadlines

The USOE provides LEAs multiple chances to review and, if necessary, revise their submitted data. Deadlines for data collections are based on reporting timelines. There must be sufficient reason to allow an LEA to resubmit data after a deadline.

Errors are best found and fixed prior to reporting data

Data should be audited and the quality control checklist passed before data is released. There must be sufficient reason to revise and re-release data after it has been published.

Accuracy must be weighed with consistency

It is important to provide accurate data to inform policy. In terms of accuracy, it is good practice to revise statistics and reports if an error is found after publishing. This is particularly true if the error may mislead. However, if data errors are corrected after release, the revised data may compete with the previously published data, causing confusion. Changing a calculation so that it is more accurate may also hinder longitudinal comparisons.

Errors made by the USOE in calculating statistics differ from errors in data reported to USOE by LEAs

Errors made by the USOE should not negatively impact schools or districts. There must be sufficient reason to not correct errors made by the USOE if the errors negatively impact schools or districts.

Errors found in current or prior year's data are easier to change than errors from earlier years

The longer the period between the occurrence of the error and the correction, the harder it is to control the effects of correcting the error. There must be sufficient reason to correct errors in older data.

Errors in data used for high stakes decisions (i.e. funding, accountability) are more egregious than other data errors

LEAs should be given opportunities to appeal certain high stakes data, such as that used for AYP. High stakes data that negatively impacts schools or districts should be corrected if possible.

Revisions to previously published data should be clearly documented

Revised reports need to be clearly labeled and explained. Reports should also be date stamped.

Data Requests

Data requests require additional resources to fill. Yet, the benefits of providing data beyond state and federal requirements can outweigh the costs. Providing data to USOE staff helps them in their work. Providing data to persons and entities outside of the USOE increases transparency, promotes education in Utah, and increases knowledge about Utah public education. Thus, the USOE seeks to answer data requests that are relevant to its mission and goals and that benefit Utah public education. Data requests outside this scope can only be accommodated when resources are available.

The following four charts (figures 4-7) outline the data request process. Figure 4 shows the overall workflow, as described below. Figures 5-7 show the request process after the workflow has been assigned.

Data requests are largely the duty Data Stewards, but are supervised by the Data & Statistics Coordinator. There are three types of requests, each handled differently:

Internal Data Requests

All requests made by USOE employees should be made using the Data Request Form on SharePoint (<http://intranet/sections/DATA/DSG/Lists/Data%20Requests/Default.aspx>). This form automatically assigns the request to the appropriate Data Steward and allows for the tracking of all internal data requests. Internal data requests are approved by the department making the request and are filled by that department's Data Steward.

External, Non-Confidential Data Requests

Requests made by persons or entities outside of USOE for non-confidential data are handled by the sections responsible for the data requested. Such requests can be entered into the Data Request Form on SharePoint by a USOE employee. They may also be initiated by the requestor completing the web request form on the USOE website under Data & Statistics, Educational Data, Data Requests (<http://www.schools.utah.gov/main/DATA-STATISTICS/Educational-Data/Data-Requests.aspx>). If a single department is responsible for all the data requested in the external request for non-confidential data, the request is approved and handled solely by that department. If the non-confidential external data request covers multiple departments, it handled by the Data & Statistics Coordinator who assigns parts of the data requests to the appropriate Data Steward(s). (For an outline of what is non-confidential data, see the section on Permitted Disclosures.)

USOE will charge \$60/hour for time spent on external data requests beyond two hours. For Utah universities, students attending Utah Universities and Non-profit Organizations, USOE will charge \$60/hour for time spent on external data requests beyond four hours. Fees may be waived on a case by case basis.

External, Confidential Data Requests

External data requests for confidential data protected by FERPA must complete the Researcher Data Request form and agree to and sign a Confidentiality and Use Agreement. These requests are handled by the Data & Statistics Coordinator, who will draw assistance from the appropriate Data Stewards and IT staff to fill the request. Before USOE will enter into an agreement to release confidential or protected data the relevant department(s) must approve the request and agree to sponsor the request. As the sponsor, a department will certify the benefit to USOE and its mission, field questions from the requestor, and assist the Data & Statistics Coordinator and IT staff in filling the request.

USOE will charge the same amount as for external, non-confidential data requests.

Figure 4:
Data Request Overall Workflow

Color Code Key	
Responsible Section	■
Data & Statistics	■
IT	■

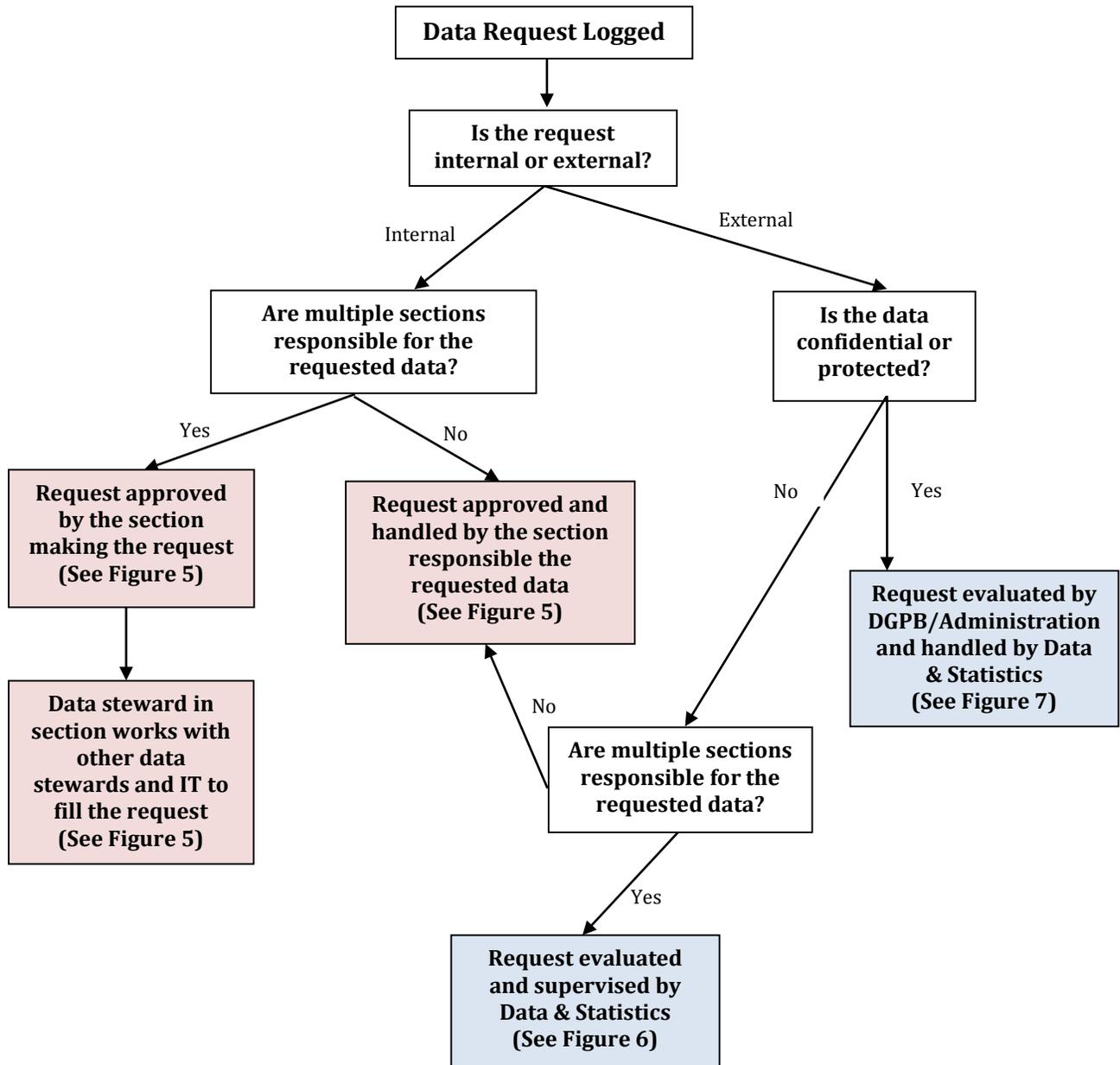


Figure 5:

Data Requests Handled by a Single Section

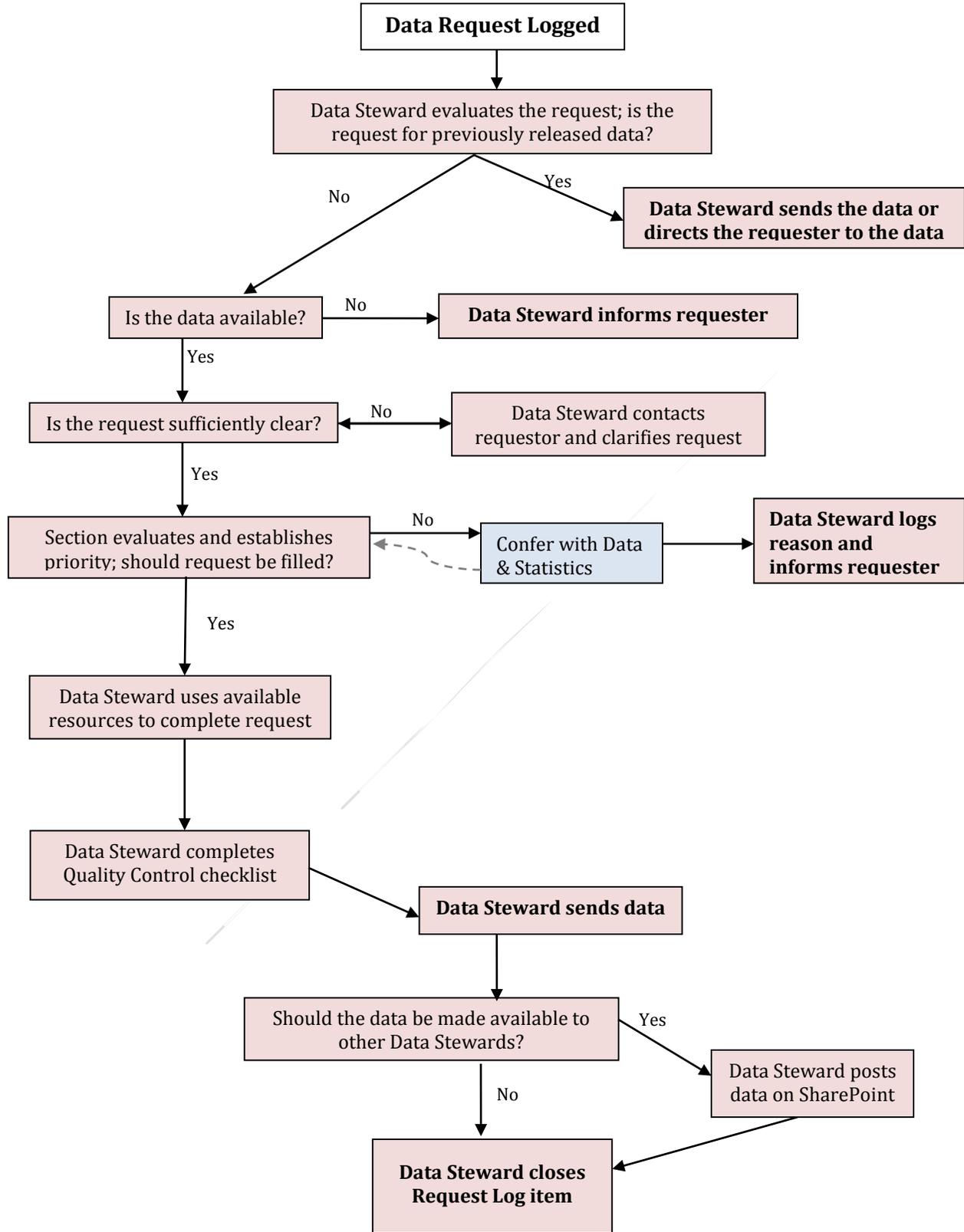


Figure 6:
External, Non-Confidential Data Requests for Data from Multiple Sections

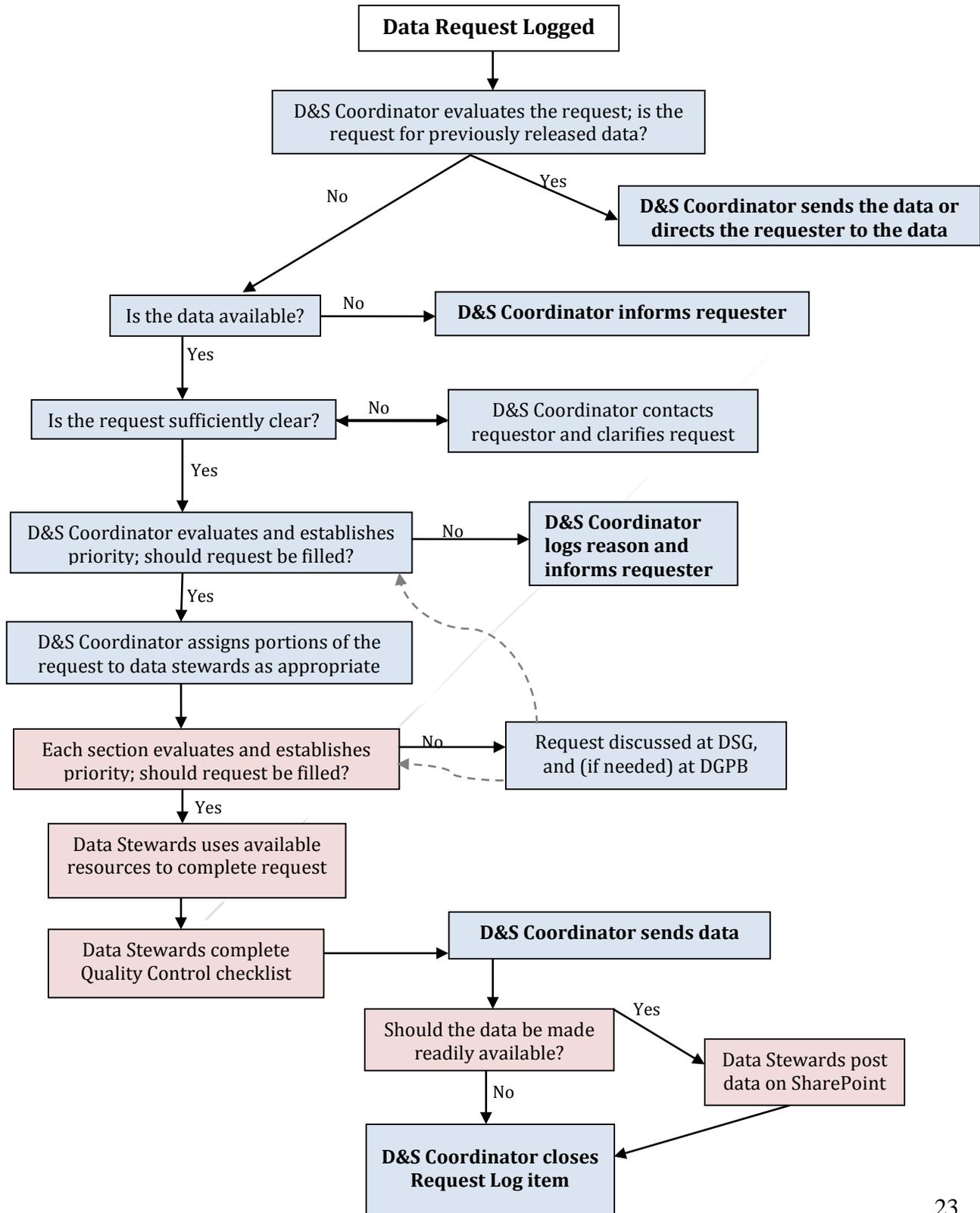
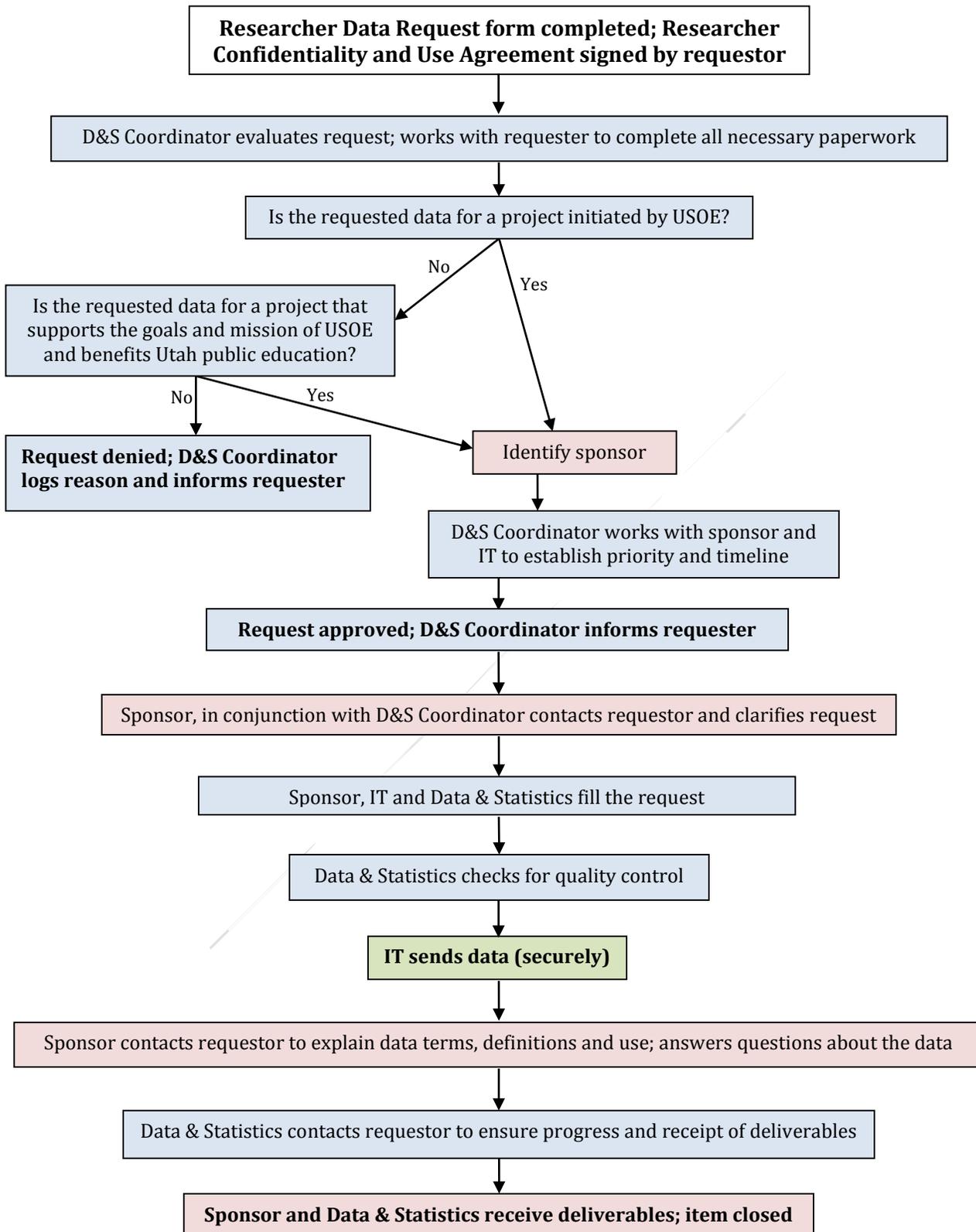


Figure 7:

Confidential or Protected Data Requests



Permitted Disclosures

Certain data is protected and cannot be released. Data on students is governed by FERPA and data on educators is governed by GRAMMA and USOE policy.

Student Data

With student data there are three questions to consider.

1. Is the requested information “directory information?” Directory information is defined by local districts and may include name, phone number, address, date of birth, awards, honors, activities the student participates in, photographs, videos of students.
 - o All directory information may be released without prior written parental or student consent.
2. Is the requested information an education record? Education records are records, in any format, created and maintained by the education agency that directly relate to a student. A state superintendent report on education is not an “education record;” a student’s score on a state CRT is.
 - o Education records may not be released unless the information falls under an exception.
3. Is the information identifiable? Personally identifiable information includes a student’s name, the name of the student’s parent or other family member, the address of the student or student’s family, a personal identifier such as the student’s social security number or student number, a list of personal characteristics that would make the student’s identity easily traceable, or other information that would make the student’s identity easily traceable. USOE considers district and school name to be PII at the student level. USOE does not consider the above characteristics PII if aggregated where the n size is greater than 10.
 - o If a reasonable researcher could determine who the student is based on the information, it may not be released unless the information falls under an exception. The USOE does not release data where the n size is less than 10 or if a larger group is 0 or 100 percent.

In general, if the requested information is part of an education record or if the requested information contains identifiable information that is NOT included in the definition of directory information, it can ONLY be released with parental consent or if one of the exceptions to consent applies.

If the answer to any of the following questions is “yes,” the information may be disclosed with proper logging of whom requested the information, when it was released, what information was disclosed, and a written reminder (in the form of a cover letter or written agreement, depending on the situation) to the requester that the information may not be disclosed to a third party and must be destroyed within a specified time period.

1. Is the requestor a school official who has a legitimate educational interest in the child?
Example of an acceptable use NOT requiring parental permission: The school principal asks to see the test scores of five students over the past ten years to determine proper placement.
2. Is the requestor from another school, school system, or post-secondary institution where the student seeks or intends to enroll? Example of an acceptable use NOT requiring parental permission: The student sent an application in to a private school. The school requests the student’s test scores as part of the application process.
3. Is the requester from the Dept. of Education, comptroller general of the United States, or a state or local education authority?

- Is the requestor seeking the information as part of an audit or evaluation of federal or state education programs? OR
 - For the enforcement of or in compliance with requirements related to those programs?
4. Example of an acceptable use NOT requiring parental permission: The Dept. of Ed. requests student level information for charter schools as part of its evaluation of our use of Race to the Top funds.
 5. Is the requestor conducting a study “on behalf of” USOE? “On behalf of” means USOE agrees with the purpose of the study (though it may disagree with the results) and retains control over the information from the education records that it disclosed.
 - is there a written agreement between USOE and the researcher specifying the purpose of the study, AND
 - is the purpose (A) related to the development, administration, or evaluation of predictive tests, or (B) related to the administration of student aid programs or (C) to improve instruction, AND
 - does the agreement specify the scope and duration of the study, AND
 - does the agreement require that the researcher destroy or return all of the personally identifiable data when it is no longer needed and specify a time period for the destruction or return of the information?
 6. Is the requested an accrediting organization seeking information for the accreditation process?
 7. Is the requester a custodial or non-custodial parent of the student?
 8. Is the request in the form of a valid judicial order or subpoena? You may provide the information but must make reasonable efforts to inform the parents of the subpoena or judicial order.
 9. Is the request made to protect the health or safety of a student or other individual? Example of an acceptable use NOT requiring parental permission: A police officer asks USOE which school a student is enrolled in as part of an effort to locate a missing child.

Educator Data

GRAMA requires that we release educators’ work contact information and qualifications for licensing. Most aspects of the CACTUS record are considered public record and are available to individuals requesting the information. This includes license status, endorsements, degree information, current assignment, business email, address and phone number, etc.

Educators’ ethnicity, birth date, personal email, and home addresses are private and protected information and may NOT be released to third parties. USOE employees may use the private data fields for essential research within the agency if

- There is a compelling reason to use the data that is related to our core functions, AND
- Any released information using these private data fields are not identifiable.