



Rhode Island Longitudinal Data System Data Governance Policy

January 23, 2024

1. Purpose

In June 2023, the Rhode Island General Assembly passed the Rhode Island Longitudinal Data System Act (R.I. General Laws § 42-165, RILDS Act) institutionalizing the Rhode Island Longitudinal Data System (RILDS, f.k.a. the Rhode Island DataHUB) as the state's central repository for interagency, longitudinal linked data. The RILDS Act formalized the state's commitment to maintaining an integrated, longitudinal data system that connects data across sectors and over time to support research aligned with the state's priorities, informs policymaking and program evaluation, and improves the well-being of all Rhode Islanders.

The RILDS Data Governance Policy establishes a format for governance of RILDS. A coordinated statewide data governance program is critical to fulfilling the demand for accurate, complete, relevant, and timely data. Governance establishes the structure, policies, and procedures of how data are collected, stored, transferred, and used. It ensures the availability, usability, quality, privacy, and security of the data.

2. Scope

This Data Governance Policy supplements the RILDS Act as well as existing memoranda of understanding or other agreements that have been executed by and between the Data Contributing Agencies and the Rhode Island Office of the Postsecondary Commissioner on behalf of the RILDS Center for recurring participation in RILDS.

This Data Governance Policy should be read in conjunction with all other RILDS Center policies and processes governing RILDS as well as applicable federal and state laws and regulations. Should there be a conflict between the terms and conditions set out in this Data Governance Policy and the terms and conditions agreed upon in a Data Contributing Agency memorandum of understanding, the terms and conditions set out in the memorandum of understanding shall control. These terms and conditions include, but are not limited to, questions of liability, data access, storage, transfer, use, confidentiality, privacy, and security.

RILDS data shall only be for the legitimate business of the RILDS Center as outlined in R.I. Gen. Laws § 42-165-4 and as required in the performance of job functions. RILDS is authorized by R.I. Gen. Laws § 42-165-4 to enable the integration, linkage, and management of information. The RILDS Center is empowered to act as authorized representative, research partner, and business associate of the state's agencies under and in accordance with the requirements of applicable federal and state laws and regulations. Data Contributing Agencies, referred to as "Participating Agencies" in R.I. Gen. Laws § 42-165-3, retain ownership of their data. RILDS data cannot be used, released, or disclosed except as expressly authorized under applicable federal and state laws and regulations and with the consent of the applicable Data Contributing Agency. Where a Data Contributing Agency objects to the use, release, or disclosure of their data, the RILDS Center shall not proceed with such use, release, or disclosure.

3. Definitions

3.1. Data Contributing Agencies

Data Contributing Agencies are defined as any Rhode Island state agency, Rhode Island municipal government, research institution, non-profit organization, community foundation, or other entity that has executed the RILDS MOU.

3.2. Data Governance Committee

The RILDS Data Governance Committee established per R.I. Gen. Laws § 42-165-5 with authority to approve Requests.

3.3. Directly Identifiable Information

Information that alone is linked or linkable to a specific individual and that would allow a reasonable person to identify the individual with reasonable certainty.

3.4. Executive Governing Committee

The RILDS Executive Governing Committee established per R.I. Gen. Laws § 42-165-5 with responsibility for governing RILDS.

3.5. Non-Data Contributing Agencies

Any Rhode Island State agency, excluding Data Contributing Agencies, that serves on the Executive Governing Committee as named in the Rhode Island Longitudinal Data System Act, namely the Rhode Island Department of Administration, Rhode Island Division of the Information Technology, Rhode Island Executive Office of Health and Human Services, and Rhode Island Office of Management and Budget.

3.6. Public Output

Any presentation, publication, report and other product ready for public release containing aggregate-level RILDS data, such that individuals cannot be directly or indirectly identified. In other words, Public Outputs do not contain Directly Identifiable Information.

3.7. RILDS

The data system formerly known as the Rhode Island DataHUB operated by DataSpark at the University of Rhode Island, is the State of Rhode Island's statewide longitudinal data system, established per R.I. Gen. Law § 42-165-2.

3.8. RILDS Center or Center

The entity formerly known as DataSpark at the University of Rhode Island, and whatever other resources are necessary to accomplish the powers and duties prescribed in R.I. Gen. Law § 42-165, manages and operates RILDS and conducts research and evaluates programs.

3.9. RILDS MOU

The memorandum of understanding or other agreement executed by and between the RILDS Center and any Rhode Island state agency, Rhode Island municipal government, research institution, non-profit organization, community foundation, or other entity for recurring participation in RILDS.

3.10. State and Federal Privacy Laws

All applicable state and federal laws and accompanying regulations, including but not limited to the federal Family Educational Rights and Privacy Act and its accompanying regulations ("FERPA"), Health Insurance Portability and Accountability Act ("HIPAA"), R.I. Gen. Laws § 28-42-38, 20 CFR 603.1 et seq., and any other privacy measures that apply to the personally identifiable information that is used by the RILDS Center and/or becomes part of the RILDS.

4. Structure

RILDS governance involves three representative governing bodies—an Executive Governing Committee, a Data Governance Committee, and Data Stewards. Each group is comprised of staff from Data Contributing and Non-Data Contributing Agencies and is coordinated by the RILDS Center.

4.1. Executive Governing Committee

As in any statewide initiative, the participation and support of executive-level agency leadership is critical to ensure that the governance and long-term sustainability of RILDS is a state priority. The Executive

Governing Committee, also known as the Rhode Island Longitudinal Data System Governing Board in R.I. Gen. Laws § 42-165-5, is responsible for prioritization and policy-setting.

4.1.1. Membership

As outlined in R.I. Gen. Laws § 42-165-5, the Executive Governing Committee includes:

- Director of any participating agencies as described in § 42-165-3 and § 42-165-6, or their designee; including as of October 2023:
 - Commissioner for Elementary and Secondary Education;
 - Commissioner of Postsecondary Education;
 - Director of the Department of Labor and Training; and
 - Director of the Department of Children, Youth, & Families;
- Director of the Department of Administration or designee;
- Director of the Office of Management and Budget or designee;
- Chief Digital Officer or designee; and
- Secretary of Health and Human Services or designee; and
- Executive Director of the RILDS Center, as set forth in § 42-165-7.

Any Rhode Island state agency that has executed the RILDS MOU shall provide an executive-level representative or designee to the Executive Governing Committee and be governed in the same manner as the initial agencies. Any other entity that has executed the RILDS MOU shall not be represented on the Executive Governing Committee.

The Executive Governing Committee shall be overseen by two co-chairs – the Director of the Department of Administration and the Commissioner for Postsecondary Education. As co-chair, the Director of the Department of Administration or designee shall be responsible for overseeing and directing the policy duties and responsibilities of the board. The other co-chair shall be the Commissioner of Postsecondary Education who shall be responsible for overseeing, supervising, and directing the operational duties of the RILDS Center and its personnel.

4.1.2. Responsibilities

Collectively, the Executive Governing Committee is responsible for:

- approving policies including those regarding,
 - how data requests will be managed;
 - the publishing of reports and other information to be made available to public stakeholders;
 - standards implemented by the RILDS Center for the security, privacy, access to, and confidentiality of data;
- establishing, overseeing and collaborating with the Data Governance Committee;
- ensuring the successful continuation, management, and expansion of RILDS;
- identifying the state's priority research and policy questions, also known as approving the research agenda drafted by the Data Governance Committee;
- approving the RILDS data request fee; and
- resolving issues escalated by the Data Governance Committee.

Individually, the members of the Executive Governing Committee are responsible for:

- appointing representatives from their agency to the Data Governance Committee and Data Stewards and including governance responsibilities in the performance expectations of these staff; and
- holding their staff responsible for adhering to the policies and processes established through the RILDS governance.

4.1.3. Expectations

Members of the Executive Governing Committee, including both Data Contributing and Non-Data Contributing Agencies, are expected to attend all Executive Governing Committee meetings. If the members cannot attend a meeting, they are expected to send a designee empowered with appropriate decision-making authority.

In line with their responsibilities, members of the Executive Governing Committee are expected to participate in meetings and communicate with the representatives from their agency to the Data Governance Committee in order to prepare for Executive Governing Committee meetings.

4.1.4. Meetings & Decision-Making

The Executive Governing Committee meets at a minimum on a quarterly basis, and these meetings are subject to the Rhode Island Open Meetings Act, R.I. Gen. Laws § 42-46. The Executive Governing Committee makes decision by a simple majority of the members present.

4.2. Data Governance Committee

The Data Governance Committee focuses on implementing the priorities and following the policies established by the Executive Governing Committee. Members of the Data Governance Committee have decision-making authority over their agency's data shared through RILDS or in-depth knowledge of their agency's priorities, and collectively, this Committee is responsible for data use and release.

4.2.1. Membership

Any Rhode Island state agency that has executed the RILDS MOU shall provide a representative with decision-making authority over their agency's data shared through RILDS to the Data Governance Committee and be governed in the same manner as the initial agencies. Any other entity that has executed the RILDS MOU shall be represented on the Data Governance Committee by an association of similar entities. The representatives from Data Contributing Agencies can vote to both approve policies and data requests.

This Committee also includes one representative from each Non-Data Contributing Agency with in-depth knowledge of their agency's priorities. The representatives from Non-Data Contributing Agency can vote to approve policies.

The Executive Director of the RILDS Center also serves on the Data Governance Committee and functions as a Non-Data Contributing Agency in regard to voting (policy-only) and facilitates the meetings.

As of October 2023, the Data Governance Committee includes:

- Director, Office of Data and Technology Services, Department of Education, or designee;

- Director of Research, Office of the Postsecondary Commissioner, or designee;
- Director of Data and Performance, Department of Labor and Training, or designee;
- Director, Office of Data Analytics, Evaluation, and Continuous Quality Improvement, Department of Children, Youth, and Families, or designee;
- Data Analyst, Division of Statewide Planning, Department of Administration, or designee;
- Chief, Performance Management Unit, Office of Management and Budget, or designee;
- Enterprise Data Architect, Enterprise Technology Strategy and Services, or designee;
- Director of Data and Analytics, Executive Office of Health and Human Services, or designee; and
- Executive Director of the RILDS Center, or designee.

4.2.2. Responsibilities

Collectively, the Data Governance Committee is responsible for:

- approving data requests;
- drafting the policies and processes of the RILDS in consultation with the RILDS Center;
- drafting the state’s research agenda of RILDS in consultation with the RILDS Center;
- identifying possible data quality issues and redirecting them to the Data Stewards or escalating them to the Executive Governing Committee for resolution; and
- investigating cases of data misuse.

Individually, the members of the Data Governance Committee are responsible for:

- modeling and advocating data governance principles;
- understanding their agency’s data shared through RILDS and communicating any issues, laws, policies, or regulations that could affect their agency’s data;
- participating in Data Governance Committee meetings and communicating with the representatives from their agency to the Executive Governing Committee and Data Stewards; and
- coordinating between data governance program of their agency and the RILDS data governance program.

4.2.3. Expectations

Members of the Data Governance Committee, including from both Data Contributing and Non-Data Contributing Agencies, are expected to attend all Data Governance Committee meetings. If the members cannot attend a meeting, they are expected to send a designee empowered with appropriate decision-making authority.

In line with their responsibilities, members of the Data Governance Committee are expected to participate in meetings and communicate with the representatives from their agency to the Executive Governing Committee and the Data Stewards.

In order to make appropriate, effective, and informed decisions regarding data use, members of the Data Governance Committee from Data Contributing Agencies are expected to be familiar with:

- federal and state law and regulation concerning their agency’s data;
- existing memoranda of understanding or other agreements that have been executed by and between their agency and the Office of the Postsecondary Commissioner on behalf of the RILDS Center; and
- their agency’s data shared through RILDS.

4.2.4. Meetings & Decision-Making

The Data Governance Committee meets at a minimum on a monthly basis, and these meetings are subject to the Rhode Island Open Meetings Act, R.I. Gen. Laws § 42-46. For policy matters, the Data Governance Committee makes decision by a simple majority of the members present. For data requests, the Data Governance Committee makes decisions by simple majority vote of all representatives present from Data Contributing Agencies. Where Data Contributing Agency objects to the use, release, or disclosure of *their* data, the RILDS Center shall not proceed with such use, release, or disclosure.

4.3. Data Stewards

The Data Stewards are responsible for metadata and data quality, and so Data Stewards have in-depth knowledge of their agency's data shared through RILDS.

4.3.1. Membership

The Data Stewards include representatives from the Data Contributing Agencies who are responsible for understanding and ensuring the quality of the data within their realm of responsibility. The Executive Director of the RILDS Center participates in meetings of the Data Stewards in a non-voting capacity and facilitates the meetings.

4.3.2. Responsibilities

Collectively, the Data Stewards are responsible for:

- ensuring that their agency's data shared through RILDS are understood and used correctly, including providing the necessary metadata and data dictionaries; and
- ensuring data quality and resolving possible issues.

Individually, the Data Stewards are responsible for:

- preparing and submitting data to RILDS and documenting the associated processes;
- documenting and maintaining metadata on their agency's systems and their agency's data shared through RILDS;
- informing the RILDS Center of business rules, aggregate calculations, and other metrics to achieve alignment between Data Contributing Agencies and nationally; and
- identifying and resolving data quality issues.

4.3.3. Expectations

In line with their responsibilities, Data Stewards are expected to participate in meetings as necessary and communicate with the representatives from their agency or entity to the Executive Governing Committee and the Data Governance Committee.

In order to make appropriate, effective, and informed decisions regarding data quality, Data Stewards are expected to be familiar with:

- existing memoranda of understanding or other agreements that have been executed by and between their agency and the Office of the Postsecondary Commissioner on behalf of the RILDS Center; and
- their agency's data shared through RILDS; and
- the processes for preparing and submitting that data to RILDS.

4.3.4. Meetings & Decision-Making

The Data Stewards meet as necessary and make decisions simple majority of the members present.

4.4. RILDS Center

As the manager and operator of RILDS, the RILDS Center's leadership of and participation in the RILDS governance program is critical to its success.

4.4.1. Responsibilities

The RILDS Center is responsible for:

- acting as an authorized representative, research partner, and business associate of the state's agencies under and in accordance with applicable federal and state laws and regulations;
- entering in memorandum of understanding and other agreements with Rhode Island state agencies, Rhode Island municipal governments, research institutions, non-profit organizations, community foundations, and other entities for the purposes of data sharing and analysis;
- advancing researching and allowing policymakers to explore critical research policy questions and providing analysis and reports that assist with evaluating programs and measuring investments;
- implementing policies and processes approved by the Executive Governing Committee that govern the security, privacy, access to, and confidentiality of the data;
- ensuring the privacy and security of RILDS and the agency data shared through RILDS, and maintaining insurance coverage;
- coordinating with Data Contributing Agencies and the Data Stewards to ensure the integrity and quality of RILDS data;
- convening and communicating with the governing bodies; and
- advising the Data Governance Committee about the feasibility, scope, and cost of requests; and responding to approved data requests.

5. Initiating Recurring Participation in RILDS

5.1. Policy Statement

Any Rhode Island state agency, Rhode Island municipal government, research institution, non-profit organization, community foundation, or other entity may initiate recurring participation in RILDS by executing the RILDS MOU. The execution of the RILDS MOU initiates the agency or the entity's participation in the RILDS data governance program.

5.2. Reason for Policy

The RILDS Act established RILDS as the state's central repository for interagency, longitudinal linked data ((R.I. Gen. Law § 42-165-4(b)(2)) and empowered the Center to "enter into memoranda of understanding with state agencies, non-profits, universities, subnational governments, and other entities for the purposes of data sharing and analysis" (R.I. Gen. Law § 42-165-7(b)(2)). Similarly, the RILDS Act charged the

Executive Governing Committee with “the successful continuation, management, and expansion of the RILDS” (R.I. Gen. Law § 42-165-5(b)(4)). It also established that “any agencies providing data on a recurring basis ... be governed in the same manner as the initial agencies and entities and shall be subject to applicable board policies” (R.I. Gen. Law § 42-165-5(b)). Effectively fulfilling these mandates requires that the Center pursue new partnerships and that the policies and processes for onboarding new Data Contributing Agencies be minimally restrictive.

Successful interagency data governance requires that each agency or entity sharing data through the integrated, longitudinal data system is represented in all data governance bodies and retains decision making authority over their data. By ensuring that new agencies and entities are governed in the same manner as the initial agencies and entities and subject to the same policies and processes, RILDS faithfully implements these core principles and best practices of interagency data governance.

5.3. Processes

To initiate recurring participation in RILDS, a Rhode Island State agency must execute the RILDS MOU, agreeing to:

- share data with RILDS;
- provide an executive-level representative or designee to the Executive Governing Committee;
- appoint a representative empowered with decision-making authority over the agency’s data shared through RILDS to the Data Governance Committee; and
- abide by all policies and processes approved by the Executive Governing Committee.

To initiate recurring participation in RILDS, any other entity must execute the RILDS MOU, agreeing to:

- share data with RILDS;
- coordinate with the association of similar entities to appoint a representative empowered with decision-making authority over the association’s data shared through RILDS to the Data Governance Committee; and
- abide by all policies and processes approved by the Executive Governing Committee.

In the first meeting of the Executive Governing Committee following partial execution of the RILDS MOU, the Executive Director of the RILDS Center notifies the Executive Governing Committee that an agency or entity has begun onboarding processes. The purpose of this notification is to avoid quorum challenges and not to delay expansion or, more broadly, data analysis which “supports research aligned with the state’s priorities; informs policymaking and program evaluation; and improves the well-being of all Rhode Islanders” (R.I. Gen. Law § 42-165-2(a)). Given the frequency of the Executive Governing Committee’s meetings, this notification may occur via email.

The Executive Director of the RILDS Center shall meet with the new Data Contributing Agency’s representatives to the RILDS data governance program to inform these representatives of RILDS policies and processes.

The agency or entity is a Data Contributing Agency as of the effective date of the RILDS MOU. In other words, the execution of the RILDS MOU initiates the agency or entity’s participation in the RILDS data governance program. At this point, the new Data Contributing Agency will securely transfer to the Center

or otherwise permits the Center to access electronically the data identified in the RILDS MOU. Similarly, the new Data Contributing Agency will, to the best of its ability, provide to the Center a definition for each data element.

6. Ending Recurring Participation in RILDS

6.1. Policy Statement

Any Data Contributing Agency may end recurring participation in RILDS by terminating the RILDS MOU according to the terms specified therein. The termination of the RILDS MOU terminates the Data Contributing Agency participation in the RILDS data governance program.

6.2. Reason for Policy

Successful interagency data governance requires that each agency or entity sharing data through the integrated, longitudinal data system is represented in all data governance bodies and retains decision making authority over their data. By ensuring that agencies and entities which no longer share data through RILDS are no longer represented in RILDS data governance bodies, RILDS faithfully implements these core principles and best practices of interagency data governance.

6.3. Processes

To end recurring participation in RILDS, the Data Contributing Agency terminates the RILDS MOU according to the terms specified therein. In most instances, the Data Contributing Agency provides the RILDS Center at least thirty (30) days prior written notice of such termination and specifies the effective date thereof.

Upon notification, the RILDS Center begins dealing with the data shared by the agency or entity in accordance with the terms specified in the RILDS MOU. In most instances, the RILDS Center begins destroying the data and all copies thereof and notes made therefrom and certifies destruction in writing. The RILDS Center, however, owns and maintains the right to use the Public Outputs previously developed using the data shared by the agency or entity, consistent with the RILDS MOU.

In the first meeting of the Executive Governing Committee following notification of such termination, the Executive Director of the RILDS Center notifies the Executive Governing Committee and the Data Governance Committee that a Data Contributing Agency has begun the offboarding processes. The purpose of this notification is to avoid quorum challenges. Given the frequency of meetings, this notification to the Executive Governing Committee and the Data Governance Committee may occur via email.

As of the effective date of the termination, the agency or entity is no longer a Data Contributing Agency, and so no longer:

- shares data with RILDS;

- provides an executive-level representative or designee to the Executive Governing Committee, if applicable;
- appoints a representative empowered with decision-making authority over the agency's data shared through RILDS to the Data Governance Committee; and
- abides by all policies and processes approved by the Executive Governing Committee.