

The project team tasked with imagining Data Governance for Colorado College and the impact of the EU's GDPR regulation met initially to plan how the group would approach its charge (see Appendix A). In that first meeting, the group decided to form two separate teams. One would develop recommendations for CC for the May 25 effective date of the GDPR, as well as suggestions for the coming year, while the second would develop a Data Governance philosophy for CC and a course of action to integrate the philosophy into the fabric of the college. The GDPR sub-group met several times in April and May and brought a proposal (see Appendix B) to the President's Cabinet for three interim policies and plans for communicating with various college stakeholders. The Data Governance sub-group met in May and spent time brainstorming what Data Governance would look like for Colorado College. The sub-group reviewed materials gathered from [The Data Governance Institute](#) and materials from Emory Oxford College that were presented at the 2017 Association of Institutional Researchers (AIR) Annual Conference. The Emory Oxford College colleague is considered an expert in the field of data governance. The following report and recommendations are the combined result of both sub-groups' work.

Recommendations

Data and information are resources and assets of an organization much like finances, employees, and buildings, and therefore need to be managed and stewarded in the best interest of an organization's goals and mission. Like finances, employees, and buildings, stewarding data requires protocols, policies, procedures, communication, transparency, consistency, accuracy, quality assessments, audits, security, timeliness, availability, risk, compliance, and so on. When stewarded properly, data and information at Colorado College can better help us facilitate student success and promote more trust in data and analysis amongst our community and stakeholders.

The project team recommends that the college adopt Data Governance. Data Governance at CC will initially consist of the following but may evolve over time as the college fully integrates Data Governance into the fabric of the college's day to day work.

- Clearly defined **Data-Roles** and **Responsibilities** around all data and information at Colorado College. Examples may include – data officer, data controller, data stewards, data processors, data users/consumers, etc.
- Clearly defined and relevant **Policies, Processes** and **Procedures** around the collection, use, quality control/audit, security/access, reporting, retention, and disposal of all institutional data and information.
- Clearly defined and widely used processes, trainings, policies, and procedures around **Data Regulatory Compliance**.
- Improved and enhanced **Data Availability, Data Reporting** and **Data Quality**. Build and effectively use a **Data Warehouse**, with defined **Data Definitions** and utilizing the best **Reporting Tool(s)** for the college. *Note – this work is already underway by the Data Integrity Reporting Team (DIRT). See the DIRT charter under Appendix C*

- A **Communication Framework and Plan** that will promote the value and understanding of data governance.
- A **Data Governance Council**

Initial steps (years one and two) to creating Data Governance at CC

- Define and appoint the Data Governance Council
 - Council will include representation from each division of the college, with some divisions having more than one appointee. Appointments will be made by the President's Cabinet. Initially the council will report to the President and/or her designee. After full implementation, the council's leadership authority may reside in one or more specific Cabinet member's division(s).
 - This group would function in the same way that PreEMPT does; cross-functional workgroup focused on a college-wide priority.
 - Team recommends consulting with outside expertise over the summer on how to approach Data Governance implementation at CC. The Emory Oxford College colleague (Kathy McGuire) is interested in working with CC this summer.
 - Once appointed, the council will draft its charter and develop a more specific plan for years one and two.
- Develop a Data Governance communication plan for the campus community, beginning with introducing the concept of data governance, the council, and the initial work that will begin in years one and two. Possibly build a website on data governance that will house information on the topic, the council, and the work being done.
- Define data-roles and responsibilities by role type and data type/platform.
- Inventory, review, and revise existing data-related policies.
- Identify gaps in policies, procedures, and processes as needed. Draft new policies, procedures, and processes as gaps are identified.
- Inventory, review, and update the regulatory compliance calendar, the notification process and compliance procedures for data- and information related compliance items.
- Identify gaps in institutional data trainings for regulatory compliance. Identify and/or develop training resources and a training implementation plan for all data users as appropriate for individual data user (example – FERPA, HIPPA, GDPR, Cleary, etc.).
- Work on implementing the recommendations outlined by the GDPR sub-group (see Appendix B for details).
- Identify additional resources needed to fully implement Data Governance at CC. Resources may include a budget for consultants, training resources, new positions, technology, etc.
- Develop long-range (years three through seven) plan for the continued implementation of Data Governance at CC.

APPENDIX A

Data Governance and GDPR Team Charge

Data are everywhere and higher education has more than its fair share. From student data to business data to alumni data, there are no shortages of data in higher education. Being able to use data in decision making requires that the institution has confidence in the data that is being reported and that there is ease of retrieving, interpreting and reporting on data in a timely and appropriate manner. Institutions that instill the notion of “data governance” into the fabric of its operations, when done well, improve their ability to be effective and efficient. Data Governance can be defined as the overall management of the availability, usability, integrity and security of data used in an organization. A sound data governance program includes a governing body or council, a defined set of policies and procedures, along with identified data stewards with clearly defined roles and responsibilities. A data governance program can also include plans for communications, compliance and risk management. At present, a group of staff representing various offices across campus are working on the details of campus data needs, data resources and gaps. This group known at the Data Integration and Reporting Team (DIRT) is working on recommendations to meet data needs across campus, but by design is not looking at the bigger picture of Data Governance.

The purpose of commissioning a separate group on Data Governance is to complement the work being done by DIRT. The Data Governance group will be asked to explore what Data Governance would mean at CC; what the role of a Data Governance Council might play and who (which offices) would serve on the council. Finally in the wake of the new GDPR (general data protection regulation) which takes effect in May 2018, the Data Governance group will develop recommendations for how CC will prepare for the new regulation. The Data Governance project team will complete its work and prepare recommendations for the President and the Cabinet by June 8, 2018. Those recommendations will entail (a) defining Data Governance at CC and whether the college should create a Data Governance Council, and (c) a proposed plan for responding to the GDPR.

Team Members:

Lyrae Williams (chair), Institutional Planning & Effectiveness
Jeff Montoya, Information Technology
Jim Grey, Information Technology
Phil Apodaca, Registrar
Lori Cowan, Finance & Administration
Lisa Brommer, Human Resources
Molly Bodnar, Advancement
Shannon Amundson, Financial Aid
Tom Monagan, Athletics
Matt Bonser, Admissions
John Lauer, Student Life
Pedro de Araujo, Dean’s Office representative
Rebecca McCaskill, Fine Arts Center
Megan Nicklaus, Career Center
Barbara Wilson, Risk Management
Heather Powell Browne, International Programs
Stephanie Wurtz, Communications

APPENDIX B

GDPR sub-group recommendations

1. By May 25)
 - a. After Cabinet approval, post on the CC website the interim general privacy policy (using Georgia Tech’s as a guide)

- b. After Cabinet approval, post on the CC website the interim GDPR compliance policy (using Georgia Tech's as a guide)
 - c. After Cabinet approval, post on the CC Advancement website, the interim Advancement privacy policy (using Brunel University London /others as guide)
 - d. After interim policies are posted to the website:
 - i. Send email out from Advancement to current GDPR covered alumni and donors
 - ii. *Yet to be drafted* – email to the current 30+ students who have a permanent address in the EU and who therefore are covered by the GDPR
 - iii. Working with Communications, send out an email to the college community (faculty, staff and students) an email about the new interim privacy policies, the GDPR and a general outline of the plan for the next year or so.
 - e. Launch the iModules online consent form
 - f. Launch 'consent' language on the Admissions homepage

By submitting this form, I agree to receive information about Colorado College in the mail and by email. I can unsubscribe at any time by emailing admission@coloradocollege.edu or by following 'Unsubscribe' links in email communications.
 - g. Create similar 'consent' language on the Human Resource website where people apply for jobs and upload their job applications, resumes, etc.
 - h. Identify positions and or offices that can serve as the Data Protection Officer and Data Controller(s)
2. Over the summer [assign this to a small group of people and or outside legal counsel]
 - a. Work on developing Third Party Contract language that will need to be added to CC's third party contracts where CC passes personally identifiable and or sensitive personal data to another party. We currently have a 16-page example from Slate (Technolutions), but more time is needed to explore options.
 - b. Develop a comprehensive communication plan for the next 12-18 months for the campus community on GDPR and Data Governance in general.
 3. Over the next year or so, under the larger recommendations that will come from the Data Governance and GDPR team; and possibly with legal counsel
 - a. Revisit and revise as needed the interim privacy policies (2) and GDPR compliance policy
 - b. Ask all of the offices that currently collect personally identifiable information and or sensitive personal data to go through the process of filling out the information of "lawful basis of collecting information" and, if applicable, create their own "consent form" for collecting sensitive personal data. (see Georgia Tech examples)
 - c. In concert with (b) above, review and update (if necessary) the college's record retention schedule and put procedures and processes in place to ensure offices and people are following the schedule
 - d. Do a test run of fulfilling a GDPR's request to see all of the information the college is keeping on them (use a current employee who is also an alum as the test subject); after that test run---- imagine the person requesting to be 'erased'. How would be college respond? What information would be erased? And what information would be retained as per federal and state laws and regulations.

APPENDIX C

Data Integration and Reporting Team (DIRT) Group Charter (Revised 5-22-18)

Background & Purpose

Over time, CC has adopted (intentionally or otherwise) a collection of individual, “best-of-breed” software solutions. This provides high quality tools for users, but the disconnected nature of these systems has created gaps in our ability to perform meaningful, campus-wide data analysis and related data-informed reporting. As a means of addressing these gaps, DIRT seeks to provide CC stakeholders with a comprehensive database structure, data warehouse, and reporting tool, necessary for timely and accurate data-informed reporting.

Definitions

The following definitions will be used:

A **data warehouse** is a data system separate from operational databases (such as Banner or Slate) that is optimized for data retrieval and reporting. Such a system integrates data from many sources, restructures data for ease of analysis and reporting. It contains read-only data, pulled from the authoritative source for the given data element.

Stakeholders are persons within the college community with a specific role in maintenance and/or usage. These may fill the roles of Data Trustees, Data Stewards, Data Managers or Data Users.

Approach

A team, consisting of individuals with key knowledge of the data needs and resources within their individual business unit (BU), will research current and anticipated campus-wide data needs, existing data resources, and where gaps exist in the data resources and/or access to those resources. Based on that research, the team will develop recommendations for a ‘master plan’ to best meet those needs. That plan will include:

- Recommendations for a data warehouse and reporting structure
- Universally agreed upon data definitions to be utilized which:
 - Are unique and specific
 - Are clear and unambiguous
 - Emphasize what the data point is, not what it is not
 - Are not circular or defined only in terms of other definitions
- Identification of any additional resources needed
- A general estimation of the budgetary and labor impact(s)
- Prioritization for implementation

Subcommittees will be established within the team to address specific topics and the makeup of the team may expand if/when additional stakeholders are identified.

These recommendations will be pass on to Administrative Systems Advisory Committee (ASAC) for prioritization. Once the cabinet approval is received, a team will work through its implementation and testing.

Expectations

Team Members

Each team member will be expected to actively participate in the larger group conversation as a representative for his/her respective business unit (BU). As such, team members will be expected to understand the needs and capabilities of their individual BU and act as a conduit for communication between the team and the individual BU. Team members will be expected to obtain necessary feedback from colleagues in their BU, identifying when the various platforms pertinent to their area can be reviewed. Should an area representative need to step down from their duties on the committee, they will also be responsible for finding an appropriate replacement.

Team members will be expected to conduct themselves respectfully and work in good faith to further the mission of the team, and by extension, the college. Members are expected to keep an open mind and focus on possibilities rather than obstacles.

Subcommittee Members

Subcommittee members will be expected to assist in identifying items for short and long-term goals within the group and assist in determining data definitions. During subcommittee meetings, members will be expected to be prepared to actively and respectfully engage in group discussions, staying on topic. As with the larger team, subcommittee members will also be expected to engage and communicate with areas and departments for which the participant is a representative on relevant subcommittee topics. To the extent that it is possible, subcommittee members will be expected to attend all subcommittee meetings. After subcommittee work is initially completed, there may be a need to review and request clarification. A chair, who is considered an appropriate representative of the subcommittee topic, will be appointed to organize and lead each subcommittee. The chair will:

- Schedule subcommittee meetings
- Facilitate and direct discussion on goals report back to larger DIRT committee about subcommittee progress
- Communicate clear charges and action items that need to be completed by subcommittee participants before or by the next group meeting,
- Ensure fulfillment of long and short-term goals, incorporating input from subcommittee members,
- Oversee compilation and maintenance of a final data glossary which represents the data requests of the constituents in the subcommittee group,
- Work with Secretary to create and distribute meeting summary notes
- Identify one or more technical leads within the business unit who will be responsible for ongoing integration management.

Other Considerations

Data governance, security and access must play an important role prior to any solution rollout. However, these decisions will, deliberately, remain outside the scope of this team unless they directly impact the team's work in some way. Another team within the college, dedicated to data governance is addressing these issues specifically.

The role of this group is not to evaluate the efficacy of the current systems being used or recommend any changes to these systems.

Creating a data warehouse is a multi-year project involving data identification, dataset building, data validation, data integration, and creation of standard reports.

Data to be included should be selected based on the usefulness to the stakeholders and its source should be derived from the uniquely defined source of record.

Current DIRT membership

Team Leads

Colorado College

Data Governance and GDPR

6/11/18

- Ben Moffitt (Research Analyst, Institutional Planning & Effectiveness)
- Jim Grey (Applications Programmer/Analyst, ITS)

Research & Facilitation Support

- Erica Shafer (Associate Director, Financial Aid)

DIRT Committee

- Shannon Amundson (Director, Financial Aid)
- Jean Truty (Patron Stewardship Specialist, Fine Arts Center)
- Molly Bodnar (Assistant Vice President, Advancement)
- Patrick Hull (Enrollment Systems Administrator, Admission)
- Matt Bonser, (Director of Admission – Systems, Operations, and International)
- Pedro de Araujo (Associate Dean of the College)
- Carolyn Dickerson (Database Analyst, Advancement)
- Phil Apodaca (Registrar, Registrar's Office)
- Jennifer Rosiere-Carlos (Business Systems & Data Analyst, Finance Office)
- Candace Santa Maria (Assistant Registrar, Registrar)
- John Lauer (Associate Vice President, Student Life)
- Lisa Brommer, (Interim Director, Human Resources)
- Greg Capell (Senior Associate Athletics Director, Athletics)
- Inger Bull (Director, International Programs)

DIRT Project Sponsor

- Lyrae Williams (Associate Vice President for Institutional Planning & Effectiveness)