

## Data Governance and Transparency Policy

### 1. Overview

Data governance is key component in the overall management of information transparency, collaborative stakeholder engagement, and data collection definition/communication. Pinnacle Charter School is chartered with collecting, managing, and submitting many pieces of data for federal and state reporting. These elements and their associated performance metrics often need to be defined, modified, or removed. Creating a transparent and engaging process where various education stakeholders are involved in the process as well as a way to transparently communicate results is key to our mission to effectively communicate with our community.

### 2. Purpose

Data governance is a process designed to manage the application of technology to business needs. This policy defines the overall Pinnacle Charter School approach to managing data and transparency in the organization while engaging key stakeholders in the definition and management processes.

### 3. Scope

This policy applies to all Pinnacle Charter School staff, users, and contractors that are involved in the Pinnacle Charter School data governance and transparency efforts.

### 4. Policy

#### A. GENERAL

Pinnacle Charter School's governance, transparency, and management framework exists to:

- Align the organization's data collections with reporting requirements, mandates, goals and objectives.
- Enable high-quality oversight, planning and management.
- Produce stakeholder communication mechanisms that are transparent and understandable to the community.
- Define the roles and responsibilities necessary to create and sustain a comprehensive governance, planning, and management framework.
- Enable a departmental and statewide collaborative process for data and metric collections/definition.
- Identify and manage an orderly process for element definition, modification, and/or sunset.

#### B. MANAGEMENT OVERSIGHT

The Chief Business Officer or their designee provides the central point of accountability, leadership, vision, and coordination for Pinnacle Charter School governance. The Chief Business Officer is responsible for:

- **Data Governance Design** – Designing and implementing processes necessary to govern, plan, manage, oversee, evaluate and implement data collection and reporting elements, metric definitions, and measurements.
- **Governance** – Assisting in governance activities and decision making in a tiered governance hierarchy. They shall be part of the final decision making authority for new element definition/acceptance and are ultimately responsible for providing [LEP] guidance, coordination, planning, and management.
- **Communications** – Developing and implementing a tiered management, decision, communications, and support infrastructure around data definitions including enterprise and statewide focused information sharing.
- **Policy** - Creating policies, rules, legislation, standards and practices necessary to carry out the governance and transparency initiatives across the Pinnacle Charter customer base.

### C. GOVERNANCE DESIGN

A governance design shall be created that is tiered in structure, with appropriate representation from each department charted with collecting data, defining metrics, and reporting results through any number of mechanisms. The tiers shall be configured as follows:

- **Tier 1: Data Managers/Technical Leads**– This tier shall be comprised of Pinnacle Charter School technical and business analysts charged with element and metric definition for new and existing collections. Each department that collects and reports data shall be represented and appointed to the governance committee by their respective director or through Pinnacle Charter School leadership.
- **Tier 2: Departmental Management** – This tier shall be the first level of management approval or issue resolution for new and revised element definitions. It is made up of the directors whose groups are represented in Tier 1. Their purpose is to resolve any issues, verify all statutory and legal requirements are met, and approve business requirements and definitions for new collection elements and metrics. They are also responsible for aligning the collection elements to the statutory requirements and approving a meta-data definition for use in the public data dictionary.
- **Tier 3: Pinnacle Charter School Administrative Leadership** – This tier shall be the final decision making group for data collections. This team will review approved collection elements and recommend adoption through the board. They are also the final decision maker for any issue resolution or data management discrepancies that may be unresolved. They are the final resolution prior to approval of new collection elements.
- **Tier 4: Pinnacle Charter School Board** - This tier shall formally approve new elements within the [LEP] for collection from LEP's. They have final decision making authority on definition, collection, timing, and publication of new and modified data elements and metrics.

The Tier 1 committee shall meet on a quarterly basis. All meetings shall be public and minutes documented. Other tier meetings shall meet “on-demand” and as required based on outputs and requirements from Tier 1 activities.

## D. TRANSPARENCY

Activities of the various governance tiers shall be public and transparent to parents and the community. The following activities and mechanisms shall be used to promote disclosure and transparency of the work completed by the Governance Tiers:

- **Public Meetings** – All scheduled governance meetings shall be public and final discussion and approvals of new or modified elements, metrics, and analytics shall be made at a public meeting as part of the normal course of business. Meeting minutes shall be documented and published on the Pinnacle Charter School website.
- **Public Data Dictionary** – A public data dictionary shall be produced and managed by the Pinnacle Charter IT Director.
- **Transparency Website** - Per C.R.S. 22-16-107, Schools are required to post specific information to provide transparency to parents and the public. This must include:
  - A list explaining the Student PII that is collected and maintained in the data system. This list does not have to include information transmitted to CDE. The list must explain how the Student PII is used and shared.
  - A link to CDE's data dictionary.
  - A list of School Service Contract Providers and a copy of each contract.
  - A list of the School Service On-Demand Providers that are used by either Pinnacle Charter School or an employee of Pinnacle Charter School. This list must be updated at a minimum at the beginning and mid-point of each school year.
  - A list of School Service On-Demand Providers that is ceases or refuses to use and any responses from the On-Demand Provider. Pinnacle Charter School must also post a notice to On-Demand Providers explaining this list.
  - Post Pinnacle Charter School's Student Information Privacy Protection Policy.

## 5. Audit Controls and Management

On-demand documented procedures and evidence of practice should be in place for this operational policy as part of the Pinnacle Charter School internal processes and procedures. Evidence of compliance include:

- Current and archival public meeting minutes of governance activities
- Evidence that sign-off and acceptance processes are operational within the tiered approval environment
- Board minutes illustrating the process and procedure at work
- Anecdotal communications between tiered governance members

**6. Enforcement**

Staff members found in policy violation may be subject to disciplinary action, up to and including termination.

**7. Distribution**

This policy is to be distributed to all Pinnacle Charter School staff.

**8. Policy Version History**

Version	Date	Description	Approved By
1.0	12/15/2017	Initial Policy Drafted	