

PERSONNEL: GENERAL

DATA GOVERNANCE

I. PURPOSE

DATA AND RECORDS MAINTAINED ON BALTIMORE COUNTY PUBLIC SCHOOL (BCPS) INFORMATION SYSTEMS IS THE PROPERTY OF THE SCHOOL SYSTEM AND BCPS EXERCISES CONTROL OVER THE ACCESS TO DATA. THIS RULE ESTABLISHES GUIDELINES FOR THE MANAGEMENT OF SCHOOL SYSTEM DATA, ASSIGNS STEWARDSHIP RESPONSIBILITIES FOR BCPS DATA, ESTABLISHES THE STANDARDS FOR CUSTODIANSHIP OF SUCH DATA, AND SETS FORTH PROCEDURES FOR STORAGE, RETRIEVAL, DESTRUCTION, BACKUP, AND ACCESS, AS NEEDED, TO ENSURE PROPER MANAGEMENT AND PROTECTION OF DATA.

II. DEFINITIONS

- A. *DATA GOVERNANCE* - THE EXECUTION AND ENFORCEMENT OF AUTHORITY OVER THE MANAGEMENT OF DATA ASSETS AND THE PERFORMANCE OF DATA FUNCTIONS.
- B. *DATA STEWARD* - AN INDIVIDUAL IDENTIFIED AS HAVING THE RESPONSIBILITY OF MAINTAINING STANDARDS FOR THE SECURITY, INTEGRITY, AND AVAILABILITY OF DATA IN A SPECIFIC CONTENT AREA.
- C. *DATA STEWARDSHIP* - THE FORMALIZATION OF ACCOUNTABILITY FOR THE MANAGEMENT OF DATA RESOURCES.
- D. *EMPLOYEE* – BOTH CERTIFICATED AND NON-CERTIFICATED PERSONNEL EMPLOYED BY THE BOARD.
- E. *RECORD* – DATA OR INFORMATION IN A FIXED FORM THAT IS CREATED OR RECEIVED IN THE COURSE OF SCHOOL SYSTEM BUSINESS.
- F. *SERVICE PROVIDER* - INDIVIDUALS WHO PROVIDE SERVICE TO THE BCPS EITHER THROUGH CONTRACT, CONSULTANT CONTRACT, BUSINESS PARTNERSHIP, OR WHO ARE DEEMED AUTHORIZED USERS WHEN THOSE SERVICES INVOLVE ACCESS TO BCPS RECORDS AND DATA.

III. RESPONSIBILITIES

A. DATA GOVERNANCE COMMITTEE (DGC)

1. THE DATA GOVERNANCE COMMITTEE (DGC) IS BCPS COMMITTEE ESTABLISHED BY THE SUPERINTENDENT AND CHARGED WITH THE TASK OF THE DEVELOPMENT OF PROCEDURES AND ENFORCEMENT OF THE SCHOOL SYSTEM'S DATA GOVERNANCE POLICY.
2. THE DGC WILL HAVE THE AUTHORITY TO:
 - (a) ESTABLISH, MAINTAIN, AND ENFORCE STANDARDS AND PROCEDURES FOR THE MANAGEMENT OF BCPS INFORMATION ASSETS;
 - (b) IDENTIFY INDIVIDUALS TO SERVE AS DATA STEWARDS;
 - (c) COORDINATE DATA STEWARD ACTIVITIES; AND
 - (d) SUPPORT DATA STEWARDS TO RESOLVE DATA ISSUES AND CONFLICTS.

B. DATA STEWARDS

1. DATA STEWARDS HAVE THE PRIMARY ADMINISTRATIVE AND MANAGEMENT RESPONSIBILITIES FOR SEGMENTS OF THE DATA WITHIN THEIR SPECIFIC CONTENT AREA AND WILL BE RESPONSIBLE FOR:
 - (a) MAINTAINING THE INFORMATION ASSETS IN THEIR CONTENT DOMAIN IN COMPLIANCE WITH THE BOARD'S DATA GOVERNANCE POLICY,
 - (b) APPROVING REQUESTS FOR ACCESS TO DATA WITHIN THEIR CONTENT AREA, SPECIFYING THE APPROPRIATE ACCESS PROCEDURE, AND ENSURING APPROPRIATE ACCESS RIGHTS AND PERMISSIONS.
 - (c) ENSURING THAT THE USERS OF THE DATA FOR WHICH THE STEWARD IS RESPONSIBLE ARE AWARE OF INFORMATION-HANDLING PROCEDURES.
 - (d) ENSURING PROPER USE OF DATA.

C. DEPARTMENT OF TECHNOLOGY

1. THE DEPARTMENT OF TECHNOLOGY WILL:

- (a) INCORPATE PROCEDURES FOR DATA GOVERNANCE COMPLIANCE IN THEIR DEVELOPMENT, IMPLEMENTATION, AND SUPPORT PROCESSES IN ACCORDANCE WITH THE BCPS QUALITY MANAGEMENT SYSTEM.
- (b) ENSURE DATA INTEGRITY BY DEVELOPING PROCEDURES FOR MONITORING, MAINTENANCE, AND BACKUP SYSTEMS.

D. THE DEPARTMENT OF PROFESSIONAL DEVELOPMENT

- 1. THE DEPARTMENT OF PROFESSIONAL DEVELOPMENT, IN COOPERATION WITH THE DEPARTMENT OF TECHNOLOGY, WILL BE RESPONSIBLE FOR ENSURING ALL EMPLOYEES ARE INFORMED OF THE DATA GOVERNANCE POLICY AND ARE AWARE OF THEIR RESPONSIBILITIES UNDER THIS POLICY AND RULE

E. PRINCIPALS AND OFFICE HEADS

- 1. PRINCIPALS AND OFFICE HEADS ARE RESPONSIBLE FOR ENSURING EACH STAFF MEMBER RECEIVES APPROPRIATE TRAINING IN, AND COMPLIES WITH, ALL BOARD OF EDUCATION POLICIES, SUPERINTENDENT'S RULES, AND BCPS PROCEDURES, AS WELL AS FEDERAL AND STATE LAWS AND REGULATIONS, IN THEIR HANDLING OF BCPS DATA AND RECORDS EMPLOYEE RECORDS IN A CONFIDENTIAL MANNER, INCLUDING BUT NOT LIMITED TO:
 - (a) THE ACCURACY OF STUDENT RECORDS ON BCPS SYSTEMS;
 - (b) MAINTAINING STUDENT RECORDS AND EMPLOYEE RECORDS IN A CONFIDENTIAL MANNER.

F. USERS

- 1. USERS ARE EMPLOYEES OR AUTHORIZED SERVICE PROVIDERS OF THE SCHOOL SYSTEM WHO ACCESS DATA IN THE PERFORMANCE OF THEIR ASSIGNED DUTIES. THIS ACCESS INCLUDES READING, ENTERING, DOWNLOADING,

COPYING, OR UPDATING DATA. ALL DATA USERS MUST ADHERE TO THE FOLLOWING:

- (a) CONFIDENTIALITY: RESPECTING THE CONFIDENTIALITY AND PRIVACY RIGHTS OF INDIVIDUALS WHOSE RECORDS THEY MAY ACCESS.
- (b) ETHICS: OBSERVING THE ETHICAL RESTRICTIONS THAT APPLY TO DATA IN WHICH THEY HAVE ACCESS.
- (c) POLICY ADHERANCE: ABIDING BY APPLICABLE LAWS AND BOARD POLICIES, RULES, AND PROCEDURES WITH RESPECT TO ACCESS, USE, PROTECTION, PROPER DISPOSAL, AND DISCLOSURE OF DATA.
- (d) RESPONSIBLE ACCESS: ACCESSING AND USING INSTITUTIONAL DATA ONLY AS REQUIRED IN THE CONDUCT OF SCHOOL SYSTEM BUSINESS.

VI. DISCIPLINE

- A. ANY EMPLOYEE DEEMED TO HAVE VIOLATED THE BOARD'S DATA GOVERNANCE POLICY OR ITS IMPLEMENTATING SUPERINTENDENT'S RULE AND PROCEDURES MAY BE SUBJECT TO SUSPENSION OF HIS/HER SYSTEM ACCESS PRIVILEGES AND DISCIPLINARY ACTION, UP TO AND INCLUDING TERMINATION.
- B. IN THE CASE OF SERVICE PROVIDERS, THE CONTRACTING OFFICE WILL MAKE A DECISION ON WHETHER SERVICES SHOULD BE TERMINATED.

LEGAL REFERENCES: 18 U.S.C. §2701-2711, *ELECTRONIC COMMUNICATIONS PRIVACY ACT*
20 U.S.C. §1232g, *FAMILY EDUCATIONAL RIGHTS AND PRIVACY ACT (FERPA)*
42 U.S.C. §1320d-1, *HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT (HIPAA)*
ANNOTATED CODE OF MARYLAND, STATE GOV'T
§§10-611 to -630, *ACCESS TO PUBLIC RECORDS (MARYLAND PUBLIC INFORMATION ACT)*
COMAR 13A.08.02, *STUDENT RECORDS*

RELATED POLICIES: BOARD OF EDUCATION POLICY 3170, *QUALITY MANAGEMENT SYSTEM (QMS)*
BOARD OF EDUCATION POLICY 4002, *OBLIGATIONS OF THE EMPLOYEES OF THE BOARD OF EDUCATION OF BALTIMORE COUNTY*
BOARD OF EDUCATION POLICY 4104, *TELECOMMUNICATIONS ACCESS TO ELECTRONIC INFORMATION, SERVICES AND NETWORKS*
BOARD OF EDUCATION POLICY 5230, *STUDENT RECORDS*
BOARD OF EDUCATION POLICY 8361, *STATEMENT OF PURPOSE AND POLICY*

RELATED RULE: SUPERINTENDENT'S RULE 2373, *PUBLIC INFORMATION ACT REQUESTS: SCHEDULE OF FEES*

RULE
APPROVED: _____

SUPERINTENDENT OF SCHOOLS