
State of Vermont



**Green Mountain Care Board
Data Governance Charter**

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Table of Contents

1 Background..... 4

2 Purpose 5

3 Components of Governance 6

 3.1 Defining Data Governance..... 6

 3.2 Data Governance Goals..... 6

 3.3 Expected Results 7

 3.4 Implementation 7

 3.5 Measurement..... 8

4 Agile Methodology 9

5 Organizational Framework10

 5.1 Board Sponsorship and Vermont Open Meeting Law.....10

 5.2 Roles and Responsibilities11

 5.3 Workgroups11

Document Version History			
Version	Date	Author	Comments
1.0	11/3/14	Peter Alfrey BerryDunn	Initial version, based on several workgroup meetings, includes data governance definition and implementation sections.
1.1	12/2/14	David Regan BerryDunn	Incorporated comments from S. Murdock and revisions discussed on Dec. 2, 2014 meeting with S. Murdock, C. Leadbetter, and D. Regan.
1.2	1/13/15	Stacey Murdock GMCB	Revised following December 16, 2014 Council meeting including Workgroup's scope of work. Also added Advisory Committee section for discussion.
1.3	2/3/15	Dian Kahn GMCB	Deleted section 5.3.3 VHCURES Implementation Special Workgroup due to the suspension of the VHCURES 2.0 procurements. Renumbered the following section as 5.4 and revised this section to describe the purpose, responsibilities, and activities of the Data Advisory Committee.
1.4	2/3/15	David Regan BerryDunn	Reduced scope of proposed Section 5 with regard to workgroups, which can be described in a separate document.

1 Background

The Green Mountain Care Board (GMCB) is the steward of several data resources for the State of Vermont, including the Vermont Health Care Uniform Reporting and Evaluation System (VHCURES) and the Vermont Uniform Hospital Discharge Data Set (VUHDDS). These data resources support a number of State responsibilities and activities in health care regulation, evaluation, and innovation. Vermont law (18 V.S.A. § 9410) also specifies that, to the extent allowed by the Health Insurance Portability and Accountability Act (HIPAA), information from VHCURES is to be made available to a broader public to the extent permissible under federal and state laws addressing privacy of personal and economic information.

The GMCB has created a Data Governance Council (hereafter referred to as the Council) that consists of key staff with the authority to execute on decisions and assign resources to identified and prioritized work items. This document serves to describe some of the basic approaches that the Council will employ as it supports data governance at the GMCB. In implementing data governance, the Council will make use of existing staff that have been performing many of these functions for several years, and who are highly knowledgeable about a broad spectrum of management aspects from data quality to analytics and policy considerations. The Council will also leverage existing processes and documentation (e.g., VHCURES data use agreements, policies and procedures, file specifications) in furthering data governance practices at the GMCB.

This charter and the data governance efforts at GMCB will initially focus on the VHCURES data resource. It is expected that in the future, practices similar to those used for governing VHCURES will be applied to additional data resources at the GMCB, including VUHDDS.

2 Purpose

The GMCB is the steward of VHCURES and several other important data resources. In this role, the GMCB is responsible for a broad set of data management concerns. While not intended as an all-encompassing inventory, these concerns can generally be attributed to the following four categories:

- Data quality—Establishing data stewardship to monitor the quality of VHCURES and other data resources
- Risk—Ensuring best practices with regards to data privacy and security
- Finance—Ensuring the financial sustainability of VHCURES by evaluating expenditures and potential revenues
- Data Release—Supporting clear processes for the evaluation of data requests and the release of data to State and non-State research entities

By implementing data governance, the GMCB intends to address each of these four major areas of data management for VHCURES and other data resources. Additionally, the GMCB intends to increase mutual trust both within the agency and across other State agencies with a stake in GMCB health data resources (e.g., the Vermont Agency of Human Services, the Department of Vermont Health Access).

Data governance is also intended to help identify and formalize clear procedures for data resource management. In general, these procedures are based on agency policies, which are in turn based on agency and State principles. Many procedures related to certain aspects of data management already exist at the GMCB and are well documented. Most notably among these documents are the drafts of the Data Submission Guide and the Health Data Protection and Disclosure Guide. Neither this charter nor any other singular document is intended to provide an inventory of all the procedures that will be involved in governing the GMCB's data resources. It is anticipated that as new procedures are developed through the data governance process, modifications to this charter and other existing documentation will be required, and additional documentation may also need to be created.

3 Components of Governance

3.1 Defining Data Governance

Data governance is often an ambiguous topic, and multiple definitions exist of both the term and the concepts that the term represents¹. The lack of a universal and detailed definition derives in part from the fact that the characteristics of organizations that use data and large-scale data systems show a tremendous amount of variation. Some experts have, however, suggested the following as a broad definition: “data governance is the organization and implementation of policies, procedures, structures, roles, and responsibilities which outline and enforce rules of engagement, decision rights, and accountabilities for the effective management of information assets.”² While this definition certainly pertains to the utility of data governance at the GMCB, the agency has additional considerations with respect to the management of a data consolidation vendor; oversight of data quality checks and improvement; administration of technical specifications and data use agreements; alignment of analytic efforts with State objectives and policy needs; and increasing the utility of maturing data resources. There are many more additional considerations to be taken into account when adapting the definition of data governance at the GMCB.

At a minimum, data governance at the GMCB is intended to be the organization of the agency's approach to the implementation of the Board's policies in managing VHCURES and other data resources, including vendor management, data quality oversight, data release, and analytic agendas. This definition is provided with the understanding that a formalized approach to data governance at the GMCB is currently in its early stages, and will need to be adjusted and elaborated as the program matures.

3.2 Data Governance Goals

The goals of data governance for VHCURES and other data resources will include:

- Managing and mitigating privacy and security risks
- Monitoring and improving the quality of the VHCURES data
- Establishing data release policies and procedures for State and non-State research entities
- Aligning data resource management, analytic agendas, and policy initiatives at the agency and the State
- Improving the financial sustainability of VHCURES and other data resources

¹ Alex Berson and Larry Dubov. *Master Data Management and Data Governance*. McGraw Hill. 2011. pp 400.

² Ladley, John. *Data Governance*.

3.3 Expected Results

Through the work of the Council and the prioritized work items, the following results are expected:

- Continued refinement of existing data release policies to ensure the safeguarding of protected health information and compliance with federal data security standards
- Creation of well-defined stewardship roles within the Council and with select members of the GMCB and GMCB staff members
- Development and implementation of data governance and stewardship processes
- Establishment of collaborative and transparent processes with the data consolidation vendor and analytic researchers
- Establishment of regular meetings of the Council and adherence to Vermont Open Meeting Law
- A documented quality assurance process with the VHCURES vendor, including provisions to engage payers in the data validation
- Periodic evaluation of the GMCB's ability to respond to State and non-State data requests as part of continuous improvement efforts

3.4 Implementation

The extent to which organizations may choose implement data governance practices varies widely, with most implementations being non-comprehensive.³ This does not imply that any one organization's implementation is incomplete or inadequate, and in fact may often be the result of adapting the scale of data governance to true organizational needs.

Many different frameworks for data governance are described in relevant literature. A framework can be considered the definition of roles, responsibilities, and processes of a data governance team.⁴ Very comprehensive frameworks may be considered appropriate for organizations that produce large volumes of data, manage and warehouse data internally, conduct analytics and interpretation internally, and modify internal business processes based on analytic results. These comprehensive frameworks may also require substantial resources to implement effectively, and many data-centric organizations have encountered difficulties in achieving effective results from complex data governance frameworks. Consequently, many organizations have adopted an agile approach to data governance, which borrows the term from agile software development practices that have proliferated since the early 2000s.⁵

³ Alex Berson and Larry Dubov. *Master Data Management and Data Governance*. McGraw Hill. 2011. pp 401.

⁴ Martha Dember, "7 Stages for Effective Data Governance," <http://www.architectureandgovernance.com>. Retrieved 11 July 2014.

⁵ "Agile Software Development," www.wikipedia.org. Retrieved 11 July 2014.

In general the goal of agile data governance is to allow organizations to address data management initiatives in increments that are sized according to the specific organization's available resources and rate of project execution. This approach helps to ensure that individual and specific governance results are achieved in the short-term, simultaneously contributing to advances in long-term objectives. The GMCB has adopted agile processes in their approach to data governance, many of which are described further in subsequent sections of this charter.

3.5 Measurement

Measurement of data governance success will be established and reviewed by the Council to ensure there is alignment with data governance principles, policies, and procedures (e.g., the Council intends to establish metrics that answer whether the data governance initiatives at the GMCB can achieve financial sustainability for VHCURES through effective data stewardship). Factors that may contribute to establishing measurements that describe data governance success may include:

- Realization of data governance results as identified above
- Acceptable timeframes associated with taking governance initiatives from 'active' status to 'substantially complete'
- Quantifiable increases in data quality and data resource utility
- Increased availability of organizational resources in conjunction with improved organization of data management procedures

The Council will work on an ongoing basis to refine a set of program metrics for reporting to measure the success of the GMCB's data governance program, as well as the timing and delivery method of metrics and reporting.

4 Agile Methodology

The agile approach for data governance is derived from agile software development methodologies, which were developed in response to the known shortcomings of comprehensive, process-oriented development methods. The overarching intent of the agile approach is to deliver completed work items that have resulted in significant gain and benefit to the GMCB or its data resources, while simultaneously maintaining a robust and prioritized inventory of the work items that the Council may choose to address depending on resource availability, typically referred to in agile methodology as a “backlog”. The backlog of work items will be maintained on SharePoint, which will be reviewed regularly by the Council. Depending on resource availability, typically only the highest priority item will be addressed at any one time. This review will allow the full attention of the assigned resources to that task in order to ensure it is completed in as timely a manner as possible. The agile approach for data governance at the GMCB will also take into account that the priorities of the GMCB can change over time, and actions supporting data governance at the GMCB can change and be re-prioritized accordingly.

The following steps should be adopted by the Council to continue organizing work specific to data governance:

- Organize the current priorities for data governance and the items that will be placed in a backlog of activities
- Between Council meetings GMCB staff will review and revise the backlog keeping Council Members informed about the contents of the backlog.
- At each Council meeting, time permitting, review current data governance activities and how each project is tracking, and review future activities that are part of the backlog to determine an appropriate priority level.
- Clarify the requirements and resources required for current priorities for data governance, as selected by the Council
 - Determine the individuals or workgroup(s) to support the current priorities
 - Estimate the resource commitment involved for each priority
 - Determine how success for each priority will be measured
 - Track progress on each activity through the use of SharePoint
- At Council meetings, discuss and assess how the agile approach is progressing and where improvements can be made

5 Organizational Framework

5.1 Board Sponsorship and Vermont Open Meeting Law

On September 4, 2014, the Board approved the development of a data governance program and the formation of the Council to implement the program. With this approval, the Council will act as a public body within the definition of Vermont Open Meeting Law, since it is a committee of the Board. All meetings of the Council will comply with the Open Meeting Law requirements and will be open to the public. To meet additional requirements, the Council will ensure:

- Public announcement of all meetings. The schedule of meetings (with details on meeting date, time and location, etc.) is made available to the public on the GMCB and Vermont Department of Libraries websites
- The Open Meeting Law requires that any gathering of a quorum of the voting members of the Council, for the purpose of discussing the business of the Council or taking action, must be held as an open meeting, with notice given to the public
- In general, the same procedures that guide how internal communications are conducted with the Board are relevant to the voting members of the Data Governance Council
- Agendas are posted 48 hours in advance for all meetings
- Special meetings of the Council will be announced at least 24 hours before the meeting
- To the extent possible, the meeting agenda will indicate if the Council will be voting on a particular topic
- Minutes taken at meetings are made available five days after each meeting
- Public comment (subject to reasonable rules, 1 V.S.A. § 312(h)) is made available at each meeting
- Responses are made in a timely manner when there is an allegation of violation of the law. 1 V.S.A. § 314(b)
- Documents created by and for the Council should be marked “For Discussion Only” while the document is being developed, or if the intent of the document is solely to support a discussion during a Council meeting. As the document approaches a draft for review by the Council, it should then be marked as “Draft”. Documents that are final should not contain either of the aforementioned watermarks.
- Only final versions of documents are posted to the GMCB website. Other documents may be made available to the public upon request.
- Working documents created for discussion by the Council will be maintained according to the Green Mountain Care Board records retention schedule.

The Council can assign work to its members or individuals outside its membership, which can be conducted outside of a public meeting, just as the Board assigns work to its staff. Vermont Open Meeting Law applies to the Council’s meetings, but not to all of its work.

5.2 Roles and Responsibilities

The voting membership of the Council will be comprised of three distinct roles.

1. **Council Chair:** The Chair of the Council is responsible for overseeing the data governance work between Council meetings, for managing the meeting, and facilitating decision making of the Council. The role of the chair will be held by the Executive Director of the GMCB.
2. **Council Members from the Board:** The Council will include Board members in its membership. Their role is to provide the perspective of the board and to communicate with other board members about the work of the Council.
3. **Council Members from the Staff:** The Council will include executive-level staff members to provide a high level perspective on the alignment of data management activities with the business initiatives of the GMCB to support the Council in decision-making.

Non-voting members of the Council will participate in Workgroups and Council meetings providing the Council with information related to their respective areas of expertise. Non-voting members will include GMCB General Counsel and staff members who have data management or analysis roles in the Agency.

The membership of the Council approved by the GMCB on September 4, 2014 is summarized in the following table:

Voting members	Non-voting members
Ena Backus	Mike Donofrio
Susan Barrett (Chair)	Dian Kahn
Mike Davis	Stacey Murdock
Betty Rambur	Zach Sullivan
Allan Ramsay	

Review of the membership (both voting and non-voting members) of the Council will be conducted on an ongoing basis, and when necessary, changes to the composition of voting and non-voting membership will be made to support the objectives of the Council.

5.3 Workgroups

In addition to the membership of the Council, workgroups may be created to support GMCB data governance activities. Standing workgroups may guide a particular area of data governance (e.g., Data Quality or Data Release) and special workgroups may be assigned a specific role over an expected timeframe. Workgroups are not intended as policy-making bodies but will inform the Data Governance Council on matters related to the management of the GMCB's information resources. To ensure proper administration, each workgroup should have a

lead member responsible for scheduling, planning, facilitating workgroup meetings, and reporting to the Data Governance Council as needed.