State of Vermont



# Green Mountain Care Board Data Governance <u>and Stewardship</u> Charter

Version 1.4
February \_3, 2015
January 23, 2018



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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.	
1.4.1	11/1/17	<u>Dian Kahn</u> <u>GMCB</u>	First series of proposed edits for review by the DGC planning group prior to presenting to Susan Barrett, Executive Director	
1.4.2	11/30/17	Dian Kahn GMCB	Second round of proposed edits following review of version 1.4.1 on 11/21/17 by DGC planning group (Dian Kahn, Sebastian Arduengo, Roger Tubby, David Glavin) in preparation for presentation to Susan Barrett, Executive Director	
1.4.3	1/23/18	<u>Dian Kahn</u> <u>GMCB</u>	Third round of proposed edits following review of version 1.4.2 on 1/23/18 by DGC planning group (Sarah Lindberg, Dian Kahn, Sebastian Arduengo, David Glavin) in preparation for presentation to Susan Barrett, Executive Director	

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## 1 Background

The Green Mountain Care Board (GMCB) Under 18 V.S.A. Sections 9405, 9410, 9453, and 9454, the Green Mountain Care Board (GMCB) has broad authority and responsibilities to maintain a health care database that includes both hospital- and insurer-reported data submitted in uniform formats and has requirements to analyze health care resources.

expenditures and utilization. GMCB is the steward of several data resources for the State of Vermont, including the Vermont Health Care Uniform Reporting and Evaluation System (VHCURES) that includes eligibility and claims data for Vermont residents and the Vermont Uniform Hospital Discharge Data Set (VUHDDS)-) that includes records for residents and non-residents for inpatient, outpatient, and emergency department discharges from Vermont's general acute care hospitals. 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 protection of 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 make and execute on decisions and assign resources to identified and prioritized work-items. This document serves to described escribes some of the basic approaches that the Council will employ as it supports to support data governance and stewardship 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 internal resources addressing aspects of data acquisition and management aspects from, data quality teand utility, analytics, and related policy considerations. The Council will also-leverage and continuously improve existing processes and documentation (e.g., VHCURES data use agreements, policies and procedures, file specifications) in furthering data governance practices at the GMCB. The Council will also leverage the expertise of parties outside the GMCB in collaborative efforts to improve the quality and utility of its data resources, ensure financial sustainability of the data programs, manage risk in data security, and ensure appropriate access to the data to support research of benefit to Vermonters and the broader public.

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

**Commented [KD1]:** Partially lifted from Sebastian's language in the interagency MOA for the enclave services.



## 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 qualityQuality and Utility—Establishing data stewardship <u>practices</u> to monitor the quality and utility of VHCURES and other data resources
- Risk—<u>Ensuring Management—Implementing</u> best practices with regards to data protection of privacy and data security
- Finance and Program Sustainability—Ensuring the financial sustainability of VHCURES, <u>VUHDDS</u> and other data resources by evaluating expenditures and potential revenuesprogram expenses, developing new use cases for the data of interest to stakeholders and data users, and identifying and leveraging new sources of revenue
- Data Release—SupportingUse and Disclosure—Implementing clear and consistent processes for the evaluation of data evaluating requests and the release offor data touse and disclosure from Vermont State Agencies and nonNon-State research entities Entities and monitoring authorized data use and disclosure

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

Data governance is also and stewardship are 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 are influenced by state, federal, and State principles. Manyindustry policies, procedures, and norms. Many documented policies and 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 singularsingle document is intended to provide an exhaustive inventory of all the procedures that will be involved in governing the GMCB's data resources. It is anticipated We anticipate 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 will need to be created because responsive and effective data governance is an agile process.



## 3 Components of Governance

#### 3.1 Defining Data Governance and Stewardship

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, suggestedAt a minimum, data governance at the GMCB is intended to formalize the agency's approach to the implementation of the Board's policies in managing VHCURES and other data resources and will be adjusted as the data program continues to evolve. Some experts suggest 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."

Health data stewardship has been defined as "a responsibility, guided by principles and practices, to ensure the knowledgeable and appropriate use of data derived from individuals' personal health information" pertaining to data collection, viewing, storage, exchange, aggregation, and analysis.<sup>3</sup> Within this framework, central concepts include accountability for assuring appropriate use of health data that respects privacy and confidentiality while supporting "the benefits to society of using individuals' personal health information to improve understanding of health and health care." <sup>4</sup>

While this definition these definitions and concepts certainly pertainspertain to the utility of data governance and stewardship at the GMCB, the agency has additional considerations with respect to the protection of personal health and medical information including the management of adata use agreements; management of external data consolidation vendor;(s); oversight of data quality checks and improvement; administration of technical specifications and of data use agreements collection and analytics; 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, in a manner that is both responsive and financially sustainable.

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

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10/Volume-6/Pages/Data-Governance-for-Privacy-Confidentiality-and-Compliance.aspx

http://www.isaca.org/about-isaca/Pages/default.aspx

As an independent, nonprofit, global association, ISACA engages in the development, adoption and use of globally accepted, industry-leading knowledge and practices for information systems. Previously known as the Information Systems Audit and Control Association, ISACA now goes by its acronym only, to reflect the broad range of IT governance professionals it serves.

https://www.isaca.org/Journal/archives/2016/volume-6/Pages/default.aspx

<sup>&</sup>lt;sup>1</sup> Alex Berson and Larry Dubov. *Master Data Management and Data Governance*. McGraw Hill. 2011. pp 400.

<sup>&</sup>lt;sup>2</sup> Ladley, John. *Data Governance*.

<sup>&</sup>lt;sup>3</sup> Susan Baird and Justine M. Carr, M.D., Health Data Stewardship: What, Who, How. National Committee on Vital and Health Statistics, U.S. Department of Health and Human Services. September 2009.
<sup>4</sup> ibid



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 and Stewardship Goals

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

- Managing and mitigating Proactive and timely prevention, management and mitigation of data privacy and security risks;
- Monitoring and improvingContinuous improvement of the quality and utility of the VHCURES and other GMCB data resources;
- EstablishingEffective and efficient data release policies and procedures for State to
   ensure appropriate and non-State research entitiestimely data use and disclosure and
   prevent unauthorized use and disclosure;
- Aligning Improved alignment of data resource management, and analytic agendas, and priorities with policy initiatives at the agency and the within State government;
- Improving the Improved financial sustainability of VHCURES and other data resources; and
- Realization of societal benefits through uses of health data that improve the understanding of health and health care.

#### 3.3 Expected Results of Data Governance and Stewardship

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

- Continued refinement of existing data releaseuse and disclosure policies and
   <u>procedures</u> to ensure the safeguarding of protected health information and compliance
   with federal data security standards;
- Creation of well-defined stewardship roles <u>and responsibilities</u> within the Council and <u>with select members of the GMCB and within GMCB staff-members;</u>
- Development and implementation of data governance and stewardship processes including establishment of regular meetings on the Council that adhere to the Vermont Open Meeting Law;
- Establishment of collaborative and transparent processes within interactions between the data consolidation vendor(s) and data users addressing optimization of data quality and utility to support research;

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- Consultation and coordination with other state agencies to promote optimization and utility of the GMCB's data resources to meet diverse analytic researchersneeds for the development and evaluation of the State's policies and programs;
- Establishment of regular meetings of the Council and adherence to Vermont Open Meeting Law
- A documented quality assurance process with the VHCURES vendor, (s), including
  provisions to engage payers in the a mutually agreed upon data validation and
  reconciliation process and methodology; and
- Periodic evaluation of the GMCB's ability to respond to State and non-State data requests and users' concerns as part of a continuous improvement effortseffort.

#### 3.4 Implementation of Data Governance and Stewardship

The extent to which organizations may choose to implement data governance and stewardship practices varies widely, with most implementations being non-comprehensive. 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 and stewardship are described in relevant literature. AAt a minimum, a data governance and stewardship framework can be considered addresses the definition of roles, responsibilities, and processes of a data governance and stewardship team. Very Very comprehensive frameworks may be considered appropriate for organizations that produce large volumes of complex 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. Many data-centric organizations have encountered difficulties in achieving effective results from complex data governance and stewardship frameworks. Consequently, many organizations have adopted an agile approach to data governance and stewardship, which borrows the term from agile software development practices that have proliferated since the early 2000s.

In general, the goal of agile data governance <u>and stewardship</u> 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 <u>an agile processes in their approach</u> to data governance, <u>many of which areis</u> described further in subsequent sections of this charter.

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<sup>&</sup>lt;sup>3</sup> Alex Berson and Larry Dubov. Master Data Management and Data Governance. McGraw Hill. 2011. pp 401.

<sup>\*</sup>Martha Dember, "7 Stages for Effective Data Governance," http://www.architectureandgovernance.com.

<sup>&</sup>lt;sup>5</sup> "Agile Software Development," www.wikipedia.org. Retrieved 11 July 2014.



## 3.5 Measurement of Successful Data Governance and Stewardship

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

- Realization of data governance results as identified abovein section 3.3 of this charter;
- Acceptable timeframes associated with takingmoving governance and stewardship
  initiatives from 'active' status to 'substantially complete' or 'suspended' due to changes
  in goals, objectives and priorities;
- Quantifiable increases in data quality and data resource utility for internal and external data users;
- Increased availabilityinvestment of organizational resources in conjunction that coincide with gains in efficiency and effectiveness from improved organization of data management policies and procedures; and
- Identification and dissemination of data analyses and reporting that yield societal benefits in improved understanding of health and health care.

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 and stewardship program, as well as the timing and delivery method of metrics and reporting.

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## 4 Agile Methodology

The agile approach for data governance and stewardship is derived from agile software development methodologies, which were developed in response to the known shortcomings of static, comprehensive, and process-oriented development methods. The overarching intent of the Council's agile approach is to deliver completed work items that have resulted result in significant gain and benefit benefits to the GMCB-or, the State, and the broader public through use of 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 SharePointby GMCB in an electronic format that is clearly organized and accessible to the Council, which will be reviewed regularly by the Council. Depending on resource availability, typically only the highest priority itemitems will be addressed at any one time. This review process will allow the full attention of the parties assigned resources to that task in orderhigh priority tasks to ensure it is completed action and completion in asa timely a manner-as possible. The agile approach for data governance at the GMCBand stewardship will also take into account that the priorities of the GMCB canmay change over time, and. Decisions made by the Council and proposed actions supporting data governance at the GMCB can and stewardship may change and be re-prioritized accordingly.

The following steps should be <u>adoptedimplemented</u> by the Council to <u>continue</u> <u>organizingorganize</u> work specific to data governance <u>and stewardship in an efficient and effective manner</u>:

- OrganizeGMCB data governance and stewardship program staff (program staff) will
  consult with the Council to identify and organize the current priorities for data
  governance and the items that will be placed in a backlog of activities;
- Between Council meetings GMCB, program staff will take action on priority items and
  review and revise the backlog keepingin order to keep the Council Members-informed
  about the contents of the backlog-in a timely manner between and during Council
  meetings;
- At each Council meeting, program staff will review the status of priority items, identify
  and discuss new emergent priorities, and time permitting, review current data
  governance activities and how each project is tracking, and review future activities that
  are part of address the backlog to determine an appropriate evaluate the relevance and
  priority levels for these items; and
- Clarify <u>and update</u> the <u>requirements and</u>-resources required <u>forto support work on</u> current priorities for data governance, as selected by the Council<u>as follow:</u>
  - Determine the individuals or workgroup(s) needed to support the current priorities:
  - Estimate the resource commitment involved for individuals and workgroup(s) needed to support each priority;
  - Estimate appropriate target dates for each completion of priority items;



- Determine how success for each priority item will be measured; and
- Track progress on each activity through the use of SharePointan electronic format that is clearly organized and accessible to GMCB program staff and the Council.
- At Council meetings, discuss and assess how responsive and timely the agile approach is progressing and where improvements can be made and how to improve the approach.



## 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 these requirements, the Council will ensure:

- <u>Public announcementAdvance public notice</u> of all meetings. The schedule of meetings
  (with details on meeting date, time and location, etc.) <u>iewill be</u> made available to the
  public on the GMCB and Vermont Department of Libraries websites;
- The Open Meeting Law requires that anyAny gathering of a quorum of the voting
  members of the Council, for the purpose of discussing the business of the Council or
  taking action, mustwill be held as ana publicly noticed open meeting, with notice given to
  the public;
- In general, the The same procedures that guide how internal communications are conducted with the Board are relevantapply 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 votingtaking action on a particular topic;
- Minutes taken at meetings are made available five (5) days after each meeting;
- PublicThe opportunity for public comment (subject to reasonable rules, 1 V.S.A. § 312(h)) is made available at each meeting;
- Reponses to alleged violations of the law 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.; and
- Working documents created for discussion by the Council will be maintained according to the Green Mountain Care Board records retention schedule.

**Commented [KD6]:** Sebastian reviewed and proposed the revisions in this subsection on the Vermont Open Meeting Law.



The Council <u>canmay</u> assign <u>worktasks</u> to its members or individuals outside its membership, <u>which canto</u> be <u>conducted performed</u> outside of a public meeting, just as the Board assigns work to its staff. <u>Vermont Open Meeting Law applies to the Council's meetings, but not to all of its work.</u>

#### 5.2 Roles and Responsibilities

#### **Voting Membership of the Council**

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

- 1. Council Chair: The Chair of the chair will be held by the Executive Director of the GMCB. The chair of the Council is responsible for overseeing the data governance and stewardship work during and between Council meetings, including:
  - Appointing and recruiting voting members of the Council as needed to address
    vacancies or changes to the structure for managing the Council membership;
  - By delegation of the Council, Making decisions on requests for use and disclosure of data, including whether to defer any decisions on data use and disclosure or other issues of data governance and stewardship to the Board;
  - Addressing priorities identified by the Council including delegation of work to GMCB staff as needed to support addressing priority areas;
  - Working with GMCB data program staff to develop meeting, agendas and facilitatingactivities;
  - Leading Council meetings; and
  - 4.<u>• Facilitating the</u> decision\_making <u>process</u> of the Council. The role of the chair will be held by the Executive Director of the GMCB.
- 2. <u>Voting 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.</u>
- 2. Council Members from the GMCB Staff: The Council will include executive-level GMCB staff members designated by the Council chair to provide:
  - <u>Provide</u> a high-<u>level</u> perspective on the alignment of data <u>stewardship</u>, management, <u>and analytical</u> activities with the <u>businesspolicy and program</u> initiatives of the GMCB <u>to-support</u>and
  - 3.• Support the Council in decision-making.

    Non-voting members of the Council will participate in
- 3. Voting Council Member(s) from Other Vermont State Agencies or Organizations: The Council may recruit voting member(s) from other Vermont state agencies and other organizations who may be data contributors, data users, technical experts, or policy leaders to share their expertise.

The voting membership of the Council will be composed at a minimum of five (5) individuals including the Council chair. For a voting membership of five (5) members, four voting members of the Council shall constitute a quorum, except that three members shall constitute a quorum at

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any meeting upon the written authorization of the Council chair issued in connection with that meeting. The Council chair may refer items to the Board as deemed necessary and appropriate for a final vote.

A key responsibility of the Council chair is to make decisions on applications for data use agreements (DUA) and other issues pertaining to the use and disclosure of the data as identified by GMCB staff. In this role, the Executive Director may, by delegation of the Council, approve or disapprove DUA applications and other requests pertaining to use and disclosure of the data; request that applicants and requestors clarify or file additional information; or defer decision-making on DUA applications and other requests to the Board. Additional details on policies and procedures pertaining to data use, release, and re-disclosures are included in the GMCB Data Use and Disclosure Guide.

Other key responsibilities of the Council chair include identifying and queuing up issues for the Council pertaining to the other areas of data governance and stewardship including Risk Management, Finance and Program Sustainability, and Data Quality and Utility.

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 <u>voting</u> 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 by the Council chair to support the objectives of the Council.

#### 5.3 Workgroups

In addition to the membership of the GMCB Staff Support Functions

Council, workgroups chair may be created todirectly designate GMCB staff to provide technical, legal, and administrative support GMCB to the Council or delegate the designations to a staff lead. GMCB support staff will include a GMCB staff attorney and staff members with data

**Commented [KD7]:** Sebastian cited (3 V.S.A. 3090(c) for this passage

**Commented [KD8]:** Sebastian provided this language and statutory citation.

**Commented [KD9]:** I think it is important to have an more explicit reference to this particular function of the ED and the Council in the Charter. I am in the process of updating the Data Protection and Disclosure Guide that will eventually be posted on the GMCB website along with the rest of the VHCURES and VUHDDS materials.

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governance-management, analytical and administrative roles in the data program, and other capabilities as needed by the Council. The Council chair may designate a staff lead to coordinate the activities. Standing workgroups may guide a particular area of the support staff.

GMCB staff will be responsible for processing, reviewing, and making recommendations on DUA applications and requests and issues pertaining to data use and disclosure. This support role includes working with the Council chair, Council, the Board, DUA applicants, and internal and external parties who file requests and identify issues requiring clarification or decisions. Support staff will coordinate requests for information and clarification, gather and organize additional information, and schedule applicants to testify at meetings as requested by the Council or the Board.

Designated staff will also support the Council chair, the Council, and the Board with activities and research pertaining to other areas of data governance (e.g.,and stewardship including Risk Management, Finance and Program Sustainability, Data Quality and Utility, and other areas as requested.

Support staff will assist the Council during and between meetings performing activities related to:

- Addressing and making decisions on prioritized and backlogged items;
- Supporting the ED's and Council's decision-making process on DUA applications and other requests pertaining to data use and disclosure;
- Researching topics as requested;
- Planning and supporting meeting logistics and documentation;
- Posting materials and notifications on the GMCB website; and
- Supporting workgroups as assigned by the Executive Director or the GMCB or the support staff lead.

#### 5.3 Workgroupser

The Executive Director and the Council may create workgroups composed of individuals with expertise in targeted subject areas to support GMCB data governance and stewardship activities. Standing workgroups may provide guidance and advice on particular areas of data governance including, but not necessarily limited to Data Release) and special workgroups Quality and Utility, Risk Management, Finance and Program Sustainability, and Data Use and Disclosure. Workgroups addressing targeted issues may be assigned a specific role over an expected timeframe. Workgroups are not intended asto be policy-making bodies but will inform the Data Governance-Council on matters related to the management of the GMCB's data and information resources. To ensure proper administrationefficient and effective management of group process, each workgroup shouldwill have a GMCB lead member responsible for

**Commented [KD10]:** This provides a supporting role for the DUA application process as referred to in the prior paragraph. Again, I think this function of the Council merits mentioning in some detail in the Charter.



scheduling, planning, facilitating workgroup meetings, and  $\underline{\text{coordinating research and}}$  reporting  $\underline{\text{tefor}}$  the  $\underline{\text{Data-Governance-}}$ Council  $\underline{\text{and the Board}}$  as  $\underline{\text{needed}}$ .

## 5.4 Effective Date

Revisions to this Charter shall take effect upon the first meeting of members appointed thereunder.

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