



# RILDS

RHODE ISLAND LONGITUDINAL DATA SYSTEM

## Rhode Island Longitudinal Data System Data Governance Committee Minutes

Tuesday, October 17, 2023 – 11:00 AM  
Zoom Meeting: <https://uri-edu.zoom.us/j/95896081428>  
This meeting was RECORDED  
RI Department of Education, Room 606  
255 Westminster St, Providence, RI, 02903

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**COMMITTEE MEMBERS IN ATTENDANCE:** Andrea **Spargo** (RIOPC); Vincent **Flood** (DOA); Megan **Swindal** (DLT); Harris **Hameed** (DOIT); Rebecca **Lebeau** (OHHS); Kevin **Simpson** (OMB); Scott **Gausland** (RIDE) [left at 11:51 AM]; and Dana **Brandt** (RILDS).

**COMMITTEE MEMBERS ABSENT:** None.

**GUESTS:** Peg **Votta** (RIDE) [RIDE delegate for Data Request voting]; Michael Matkowski (OMB)

**SUPPORT STAFF:** Kim Pierson (RILDS)

Meeting of the Rhode Island Longitudinal Data System Data Governance Committee was called to order by Dana Brandt at 11:09 AM EST.

1. **INTRODUCTIONS** - Brandt opened the meeting and welcomed everyone.
2. **REVIEW & VOTE on Draft Policies** - Brandt introduced the first order of business, the review of two draft policies.

Brandt highlighted the purpose of the data governance program, the two governing structures established by the RILDS Act, and the responsibilities of each body. As identified through the legislation, the Data Governance Committee is statutorily only responsible for approving data requests. The draft policies proposed expansion of the Committee's scope to reflect best practices of also supporting the drafting of policies and processes in consultation with the RILDS Center, drafting the RILDS research agenda, and enforcing security policies and investigating cases of data misuse.

### i. DATA GOVERNANCE POLICY -

Brandt presented an overview of the RILDS Data Governance Policy.

Simpson inquired if the current Data Governance Meeting was public, being recorded, and if they were voting on the policies at this point or just providing feedback. Simpson asked how single-agency approval voting would occur.

Brandt presented the proposed decision-making process for the Data Governance Committee. Similarly to the Executive Governing Committee structure, she proposed that the Data Governance Committee vote by simple majority to approve sending items to the Executive Governing Committee for final approval. Per the Open Meetings Act requirements, both committees are required to meet in person, with a quorum. To ensure timely approval of data requests, she also proposed that delegates be empowered to attend with voting authority.

Swindal requested clarification as to whether any policy that goes before the Executive Governing Committee has first gone through the Data Governance Committee. Brandt confirmed

that was accurate. The Data Governance Committee would first draft the policies and vote to send them to the Executive Governing Committee for review and approval, she explained.

**Simpson** asked for clarification around delegates who may attend the Data Governance Committee and are also on the Executive Governing Committee. He inquired if their initial review and vote as a Data Governance Committee proxy would impact their ability to vote as an Executive Governing Committee member on the same matter. The Committee discussed and mutually agreed that the agency was authorized to vote on both committees and the Executive Governing Committee member still had the authority to vote on the matter in the Executive Committee as well.

**Brandt** then presented the proposed decision-making process for RILDS Data Requests that come before the Data Governance Committee. The proposal is that only Data Contributing Agencies (currently RIDE, RIOPC, DLT) who are participating in RILDS can vote on the Data Requests. Non-Data Contributing Agencies (currently DOA, OMB, DOIT, OHHS, RILDS) cannot vote on how the Data Contributing agencies use their data.

**Spargo** asked if a Data Contributing Agency has the authority to not include their data in a project. **Brandt** confirmed that yes, each Data Contributing Agency has full veto power over how their agency's data is used. They may deny use for a project unilaterally, although other agencies may still choose to participate and include their data in the project.

**Brandt** informed the committee that an agency can also require revisions to a request as well. An agency may choose to provide feedback to a researcher and request resubmission particularly when the proposal does not align with an agency's priority areas or when the agency has concerns about the proposal's compliance with federal and state privacy law.

**Swindal** highlighted the potential for release delays on an agency's side as well, especially with multi-agency projects.

**Simpson** inquired about research requests when an agency vetoes. He was curious to understand if the expectation was that there would be a lot of requests sent back for resubmission based on what an agency would prefer researched instead. **Brandt** explained that many systems operate under a "working toward yes" philosophy with the understanding that the more research that is done with a state's data, the better it is for that state which receives valuable information on its populations. The RILDS response will be determined based on the research agenda and priorities that are established.

**Hameed** asked for more information around the sharing of data. **Gausland** explained some of the purposes under FERPA in which data can be used by a researcher.

**Brandt** indicated that some of the recent questions actually fall under the second policy, Data Request & Release, and suggested closing out discussion of the first policy in order to move on to the second policy. She asked for a motion to move the outline on the Data Governance Policy to the Executive Governing Committee for review and approval.

**MOTION:** Gausland

**SECOND:** Swindal

**VOTING IN FAVOR:** Spargo, Flood, Swindal, Hameed, Lebeau, Simpson, Gausland, and Brandt.

**ABSENT:** None

**VOTING IN OPPOSITION:** None

**ABSTENTION:** None

ii. **DATA REQUEST & RELEASE POLICY** - **Brandt** presented an overview of the RILDS Data Request and Release Policy including the definition of some key terms being used in the policy including:

- **Public Output** – “any presentation, publication, report and other public release containing aggregate-level RILDS data, such that individuals cannot be directly or indirectly identified.”
- **Public Output Review Period** – “the five (5) business days in which the Data Governance Committee reviews public outputs for compliance for federal and state laws and regulations and RILDS policies.”
- **Request** – “any request, including those from Non-Contributing Agencies and Participating Agencies, for any use of RILDS data, including analysis or collection by the Center.”
- **Third Party** – “Any entity, whether Rhode Island State agency, research institution, non-profit organization, or community foundation, that is not a Data Contributing Agency or Non-Contributing Agency.”

**Brandt** reviewed the proposed Data Request process, highlighting prioritization protocols and timelines.

- All requests including those from Data Contributing and Non-Data Contributing Agencies would be submitted through the online Data Request Form.
  - Requests from Data Contributing and Non-Data Contributing Agencies would be prioritized and requests from Third Parties would be processed in the order in which they were submitted.
- All requests must be submitted fifteen (15) business days before the next Data Governance Committee meeting. Meeting dates are posted online.
- The RILDS Center will scope the request and will publish all requests online.

**Simpson** asked for clarification as to whether the requests would be published as submitted or as scoped. The Committee discussed and recommended posting as scoped to capture any revisions or changes without adding confusion with potentially many changes.

**Brandt** reviewed the evaluation element of the proposed policy. She explained that the RILDS Center will notify the Data Governance Committee of all requests. The requests will then be evaluated during the Data Governance Committee meetings. All Data Contributing Agencies, including those agencies whose data *is not included* in the request, may vote. The RILDS Center will proceed with requests approved by a majority vote of all Data Contributing members present. When a Data Contributing Agency objects to the inclusion of their data in the request that data will not be included, but the project may proceed with the use of other agency’s data if approved. If two of the three Data Contributing Agencies object then the request will not move forward as a majority was not achieved.

**Brandt** explained the proposed Aggregate-Level Release conditions. Under the proposed policy, the RILDS Center will provide copies of all Public Outputs to the Data Governance Committee at least five (5) business days prior to release. Any member of the Committee may object to the release for failure to comply with federal or state laws and regulations or RILDS policies. If after five (5) business days, no member of the Data Governance Committee objects, the RILDS Center may proceed with the release, including publishing the Public Output to its website.

**Lebeau** inquired about cell suppression rules. **Brandt** explained that cell sizes below 10 are suppressed and complementary suppression is also applied.

**Simpson** proposed extending the Data Governance Committee approval period to longer than 5 days to ensure adequate time for agency review. **Hameed** agreed that he felt the review period was too short.

**Lebeau** asked if there was a legal body affiliated with the Data Governance Committee that would review the Public Output or if separate agencies’ legal teams would review the output. **Brandt** stated that each individual agency’s legal team would review. **Swindal** added that she thought any legal review would take place before the product was complete and this review was more for ensuring discussion, but did agree that 5 days may be too short.

**Brandt** suggested that the RILDS Center develop a standard email template, with the Data Governance representative as well as a designee from their agency to be included on the email, and known naming conventions and clear deadlines to ensure timely review. She also informed the committee that many of the requests that the RILDS Center has received, including those from Data Contributing and Non Data Contributing Agencies, since the passage of the legislation require a very tight turnaround time and that complying with the request and review process does not give the RILDS Center staff much time to complete the requested analysis, before adding the 5 day review period.

**Swindal** proposed potentially two levels of review for different types of requests depending on the analysis, acknowledging that some may be a one-page table and others a multi-page detailed report.

**Brandt** proposed different policies by level of effort (suggesting every 100 hours of work requires an additional round of review). **Lebeau** suggested also including vulnerable populations as another threshold for additional review.

**Brandt** introduced the individual level data release policies. When individual-level data release is involved the Non-Data Contributing Agencies and Third Parties must execute Data Use Agreements with the RILDS Center, and at the conclusion of their project, must provide copies of all Public Output to the Data Governance Committee at least fifteen (15) business days prior to release. This is an increased amount of time, she explained, because it is work that was not done by the RILDS Center staff. **Lebeau** inquired if there was a data destruction requirement at the end of each project. **Brandt** confirmed that there was.

**Brandt** requested a motion to accept the proposed request and release process with the revision of a multiple review process for projects that require more than 100 hours or involve vulnerable populations.

**MOTION:** Gausland

**SECOND:** Lebeau

**VOTING IN FAVOR:** Spargo, Flood, Swindal, Hameed, Lebeau, Simpson, Gausland, and Brandt.

**ABSENT:** None

**VOTING IN OPPOSITION:** None

**ABSTENTION:** None

### 3. DISCUSSION & VOTE on Data Requests - Brandt presented two outstanding data requests.

*i. RI Department of Health (RIDOH)* - Brandt presented an overview of the request from RIDOH to update the Educational Impacts of Lead Exposure data story. This update would add an additional 2-3 years of data to the public analysis. RIDOH is requesting to link their records with RIDE educational records to conduct the aggregate level analysis.

**Simpson** requested adding projected # of hours, vulnerable populations, and cost of the work to the Data Governance Committee review sheet.

**Lebeau** suggested adding actual metrics.

**Hameed** inquired if the data required was information that the RILDS would need to obtain or already had received. **Brandt** confirmed that no new data would need to be obtained to complete the data request.

**Swindal** asked if the data sharing agreement with RIDOH was already established and in place. **Brandt** confirmed that the agreement was executed and the work was part of a contract with RIDOH.

**Swindal** requested a feedback loop so that the Data Governance Committee and Executive Governing Committee were aware of the work that has been completed, conclusions, findings, etc on a routine basis.

**Gausland** inquired if each request required two votes, one to move forward by the entire Committee and one by the Data Contributing Agencies to approve of their use of their data. **Brandt** stated that only one vote by the Data Contributing Agencies was required for this request.

**Brandt** called for a vote by the Data Contributing Agencies to approve the RIDOH data request. The Data Contributing Agencies unanimously approved.

**VOTING IN FAVOR:** Spargo, Swindal, Votta

**ABSENT:** None

**VOTING IN OPPOSITION:** None

**ABSTENTION:** None

ii. *RI Department of Labor and Training (DLT)* - **Brandt** presented an overview of the request from DLT to look at healthcare graduates by employment status in Rhode Island.

**Lebeau** asked if the request was going to look at both supply and demand. **Swindal** stated that this request was part of the larger Healthcare Workforce Project and would augment other data and demand would be part of the bigger picture they were able to look at with other outside data.

**Brandt** called for a vote by the Data Contributing Agencies to approve the DLT data request. The Data Contributing Agencies unanimously approved.

**VOTING IN FAVOR:** Spargo, Swindal, Votta

**ABSENT:** None

**VOTING IN OPPOSITION:** None

**ABSTENTION:** None

**Simpson** inquired if there would be an opportunity after the research is completed to look at the final product. **Brandt** stated that the 5 and 15 business day public output review periods were to review the final, completed products whether it was a dashboard, excel file, etc.

#### 4. APPROVAL of Data Governance Committee meeting schedule

**Brandt** requested a vote to approve the Data Governance Committee schedule for the remainder of 2023 as is required by the RI Open Meetings Act. **Brandt** proposed to meet on the third Wednesday of the month, Nov 15 and Dec 20, 2023 at 9:00 AM. The Committee unanimously approved the proposed dates.

#### 5. ADJOURNMENT

There being no further business the October 17, 2023 RILDS Data Governance Committee meeting adjourned at 11:57 AM EST.