



# USE CASE STUDY

## ▶ The Data Disclosure Decision

Department of Education (ED)  
Disclosure Review Board (DRB)



*A Product of the Federal CIO Council Innovation Committee*

FOUO / VERSION 1.0 / 2015

# TABLE OF CONTENTS

## U.S. Department of Education (ED)

- U.S. Department of Education Disclosure Review Board (ED-DRB)
- Lessons Learned
- Additional Resources
- Appendix

# Open Data for Student Achievement

*The U.S. Department of Education (ED) is a national focal point for open data across a decentralized educational system, managing and exchanging open data from across the country*

**ED's mission** is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access. Key objectives include:

- Establish policies on federal financial aid for education, and to distribute as well as monitor those funds;
- Collect data on America's schools and disseminate research;
- Focus national attention on key educational issues; and
- Prohibit discrimination and ensuring equal access to education.



In support of its mission, ED collects large amounts of (mostly aggregate) data from:

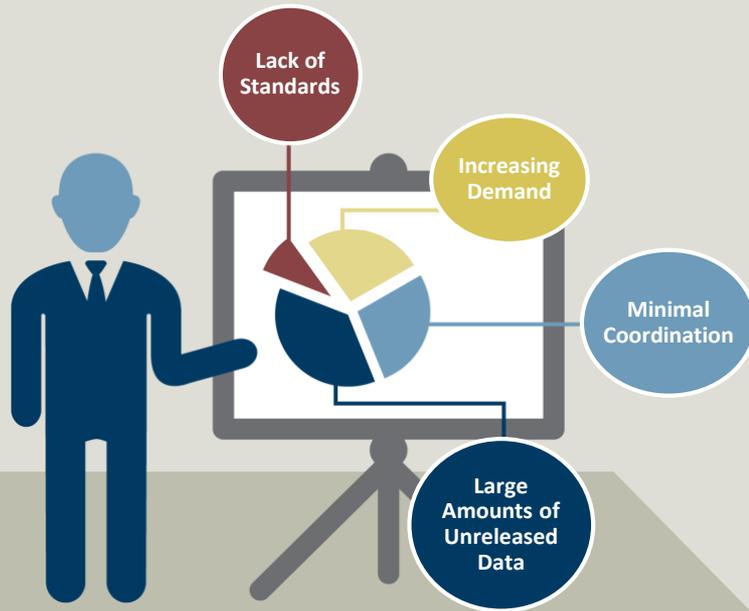
- **Schools (K-12 and Post-Secondary)**
- **School Districts**
- **State Education Agencies**
- **Students Applying for Financial Aid**

The data is used for:

- Transparency
- Accountability
- Enforcement
- Research

# Challenges with Unreleased Data

*ED started to experience increasing challenges with managing and releasing large data sets in a consistent way*



## ENVIRONMENT

- ED collects large amounts of aggregate data, at the state, district, and school level, disaggregated by a number of demographic variables.
- These data contain many “small cells,” which can easily identify specific individuals, and are considered Personally Identifiable Information (PII).
- Each program/office devised their own privacy/disclosure avoidance plan, potentially interfering with other offices’ releases of related data.
- State education agencies also hold and release related data, increasing the risk of reidentification.
- ED had unreleased data for which there was no disclosure avoidance method identified.
- Increasing demand for more publicly available data made existing release approaches unworkable.

# TABLE OF CONTENTS

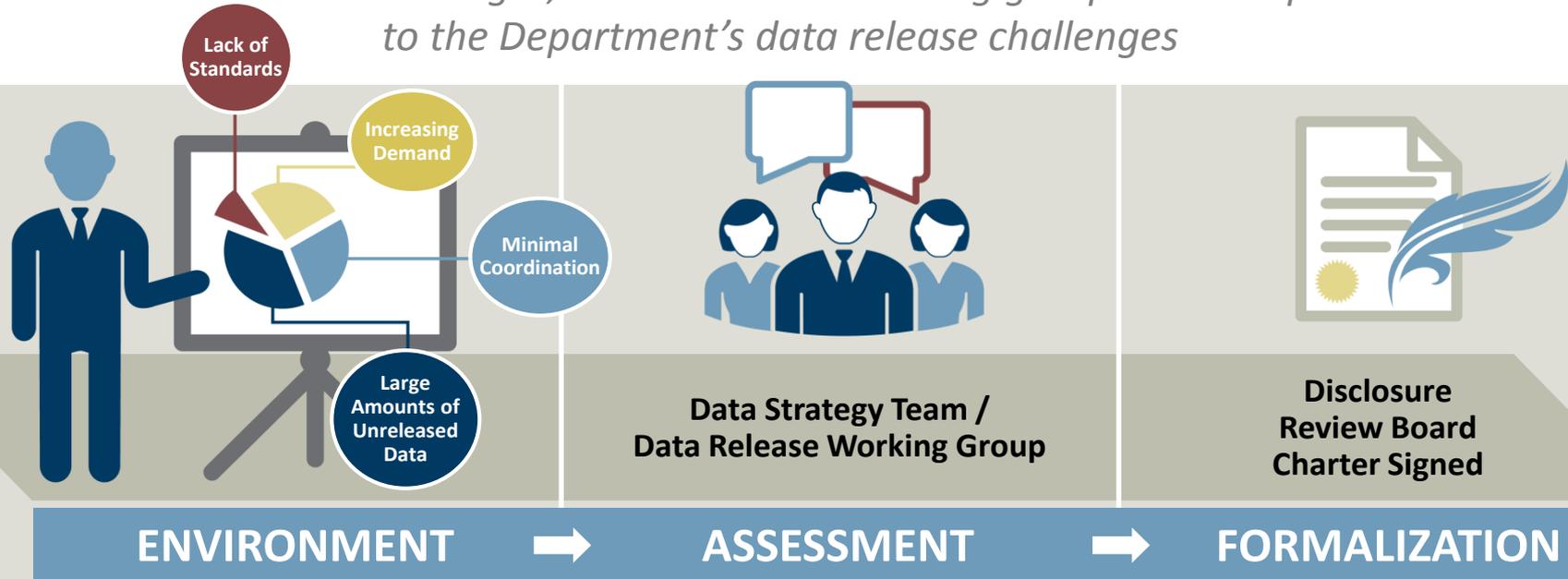
- U.S. Department of Education (ED)

## U.S. Department of Education Disclosure Review Board (ED-DRB)

- Lessons Learned
- Additional Resources
- Appendix

# Transparency of Federated Processes

*To address their challenges, ED chartered a working group to develop a solution to the Department's data release challenges*



- Emphasis on greater transparency and increased reporting highlighted several limitations and inefficiencies in a decentralized approach for data disclosure avoidance reviews.
- ED created a Data Strategy Team to provide a forum to coordinate issues relating to data collection, data stewardship, and data governance. Disclosure Avoidance became a priority and a department-wide Data Release Working Group (DRWG) was formed.
- The DRWG realized that a single privacy protection methodology would not work, given the diversity of data and data uses within and outside the Department, so the decision was made to formalize a process for reviewing and approving the privacy protections for each release.
- Secretary of Education Arne Duncan signed the Department of Education's Disclosure Review Board (ED-DRB) Charter on August 1, 2013.

# Driving Effectiveness Through Standardization

*The ED-DRB immediately went into action developing a clear vision and lines of authority while defining scope and efficient operating procedures*



The organizational structure includes members with technical and subject-matter expertise from across the Department to ensure adequate representation on all ED-DRB matters.



The ED-DRB Charter provides direction regarding the Board's mission and objectives, making full use of expertise from across the Department and the agency's statistical arm.



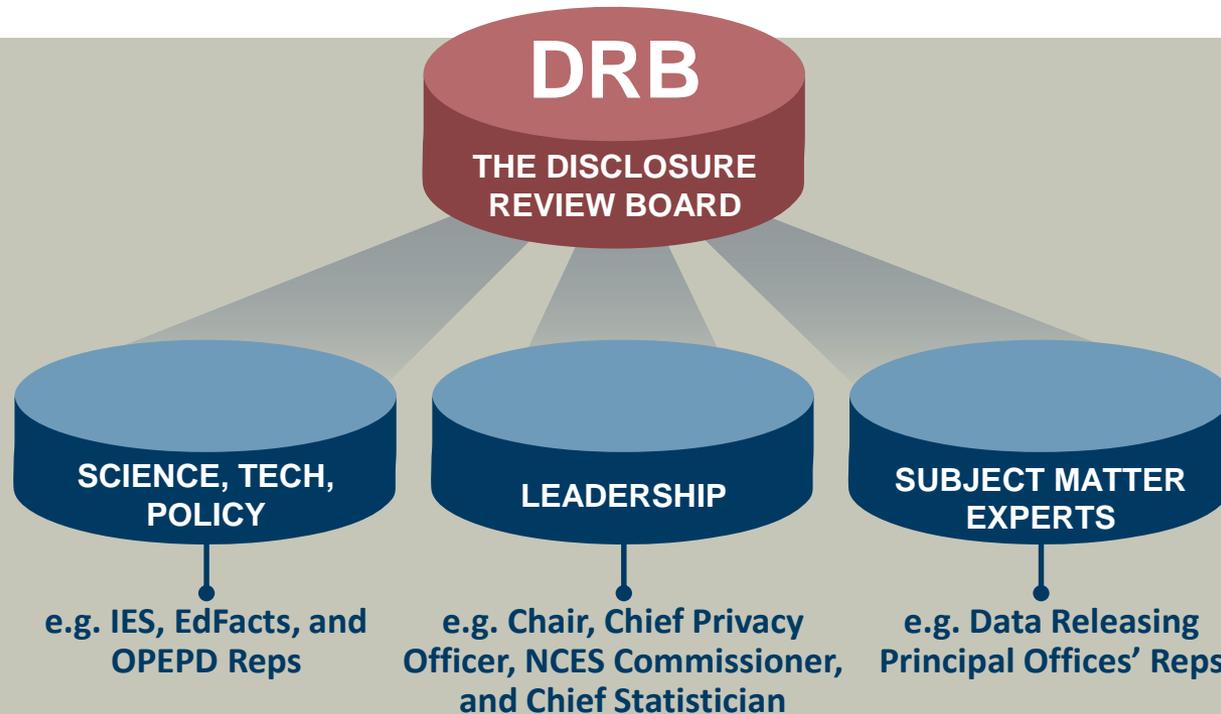
The ED-DRB established scope of authority to ensure their guidance and oversight to did not interfere with already established protocol, regulation, or law.



Standardized operations for reviews and approvals were implemented to drive consistency in disclosure avoidance plans and data release compliance.

# All Voices Heard Across the Department

*ED-DRB's organization structure encompasses representation across the Department, including experts in technology, statistics, and policy*



- The ED's Chief Privacy Officer and the National Center for Education Statistics' Chief Statistician both serve as *ex officio* members.
- Advisors were selected as review members on the ED-DRB, keeping the board updated and informed on the latest policy, management, and technology components of data releases.
- Each PO select subject matter experts to the board to collaborate on the disclosure methodologies, implementation, and compliance.
- A quorum must be met before the board reviews submitted requests. Alternate representatives are permissible to ensure timely processing of requests.

# Representing a Community

*Each of the Department's principal offices (POs) represent a community and stakeholder group to ensure released data meets their community's interests while maintaining privacy*

***The Mission of the Department of Education Disclosure Review Board (ED-DRB)***  
*is to review proposed data releases by the Department's principal offices (POs) through a collaborate technical assistance, aiding the Department to release as much useful data as possible, while protecting the privacy of individuals and the confidentiality of their data, as required by law.*

- Guide selection of a disclosure avoidance method and assist in its application
- Guide documentation in a disclosure avoidance plan

Guide



- Evaluate the disclosure/re-identification risk for proposed data releases
- Assess the effectiveness of the disclosure avoidance plan at mitigating those risks

Evaluate



- Issue a written determination ("Safe to Release" Memo) for each proposed data release
- Document whether/how the disclosure risks have been sufficiently mitigated

Recommend

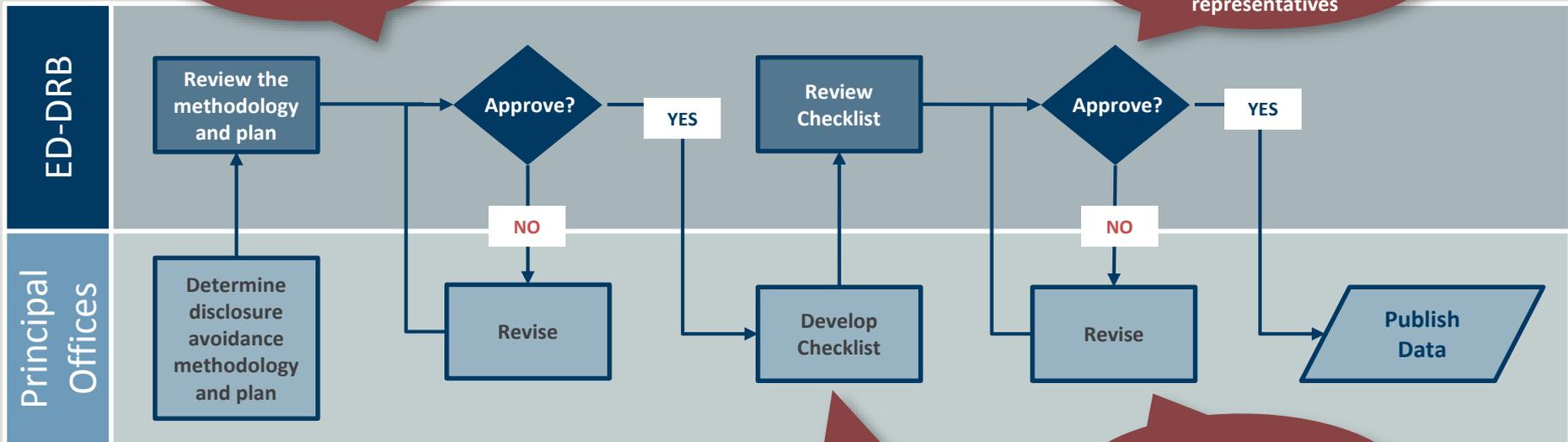


# Supporting the Process

*The ED-DRB provides guidance, tools, and checklists throughout the review and approval process, offering recommendations and support when needed*

The ED-DRB strives for consensus on all matters and provides recommendations when appropriate

If a consensus cannot be met, the DRB Chair may call a vote among advisors and representatives



An expedited process is available for urgent requests if they meet predetermined criteria.



The ED-DRB produces an annual report to document reviewed requests, decisions, and outcomes.

Offices with an established disclosure review plan initiate the DRB review process with the checklist

A Principal Office may appeal any ED-DRB decision to the Deputy Secretary

# Reaping the Benefits

*Since its inception in 2013, ED-DRB has recognized substantial successes and has greatly increased the volume and quality of data released by ED*



The ED-DRB reviewed and approved 5 major data releases for the department in FY13, allowing the member to develop a common understanding and cadence in their processes and overall board interaction.

Since the charter's formal signing in August 2013, the ED-DRB has over 14 active members representing expertise and interests across the Department.

The ED-DRB approved 22 major data releases in FY14.

By developing new disclosure avoidance methodologies, ED is now releasing substantial amounts of data that were previously not made available to the public.

The selection of more sophisticated disclosure avoidance methodologies for existing releases has greatly improved the quality and usability of the Department's public data resources.

Through the ED-DRB and the Department's Privacy Technical Assistance Center (PTAC), ED is providing substantially more technical assistance on disclosure avoidance issues to state and local education agencies, helping them to expand and improve their own open data initiatives.

# TABLE OF CONTENTS

- U.S. Department of Education (ED)
- U.S. Department of Education Disclosure Review Board (ED-DRB)

## Lessons Learned

- Additional Resources
- Appendix

# Lessons Learned

*Documenting and reflecting on key takeaways enable the ED-DRB to continually improve effectiveness of avoidance plans and timeliness of data releases*



***Cultural change is needed*** to maintain discipline around disclosure avoidance and reviews

***Senior leadership buy-in*** is necessary, but not sufficient

***Technical capacity must be developed*** for sustained effectiveness  
(e.g. succession planning and rotational membership)

***Mechanisms*** for allowing qualified individuals access to restricted-use files to help mitigate data user opposition

# TABLE OF CONTENTS

- U.S. Department of Education (ED)
- U.S. Department of Education Disclosure Review Board (ED-DRB)
- Lessons Learned

## Additional Resources

- Appendix

# Additional Resources

RESOURCES	URL
U.S. Department of Education	<a href="http://www.ed.gov">www.ed.gov</a>
U.S. Department of Education Disclosure Review Board	<a href="http://www2.ed.gov/about/offices/list/om/pirms/drb/">http://www2.ed.gov/about/offices/list/om/pirms/drb/</a>
U.S. Department of Education – Data & Research	<a href="http://www2.ed.gov/rschstat/landing.jhtml?src=pn">http://www2.ed.gov/rschstat/landing.jhtml?src=pn</a>
National Center for Education Statistics (NCES)	<a href="http://nces.ed.gov">http://nces.ed.gov</a>



# TABLE OF CONTENTS

- U.S. Department of Education (ED)
- U.S. Department of Education Disclosure Review Board (ED-DRB)
- Lessons Learned
- Additional Resources

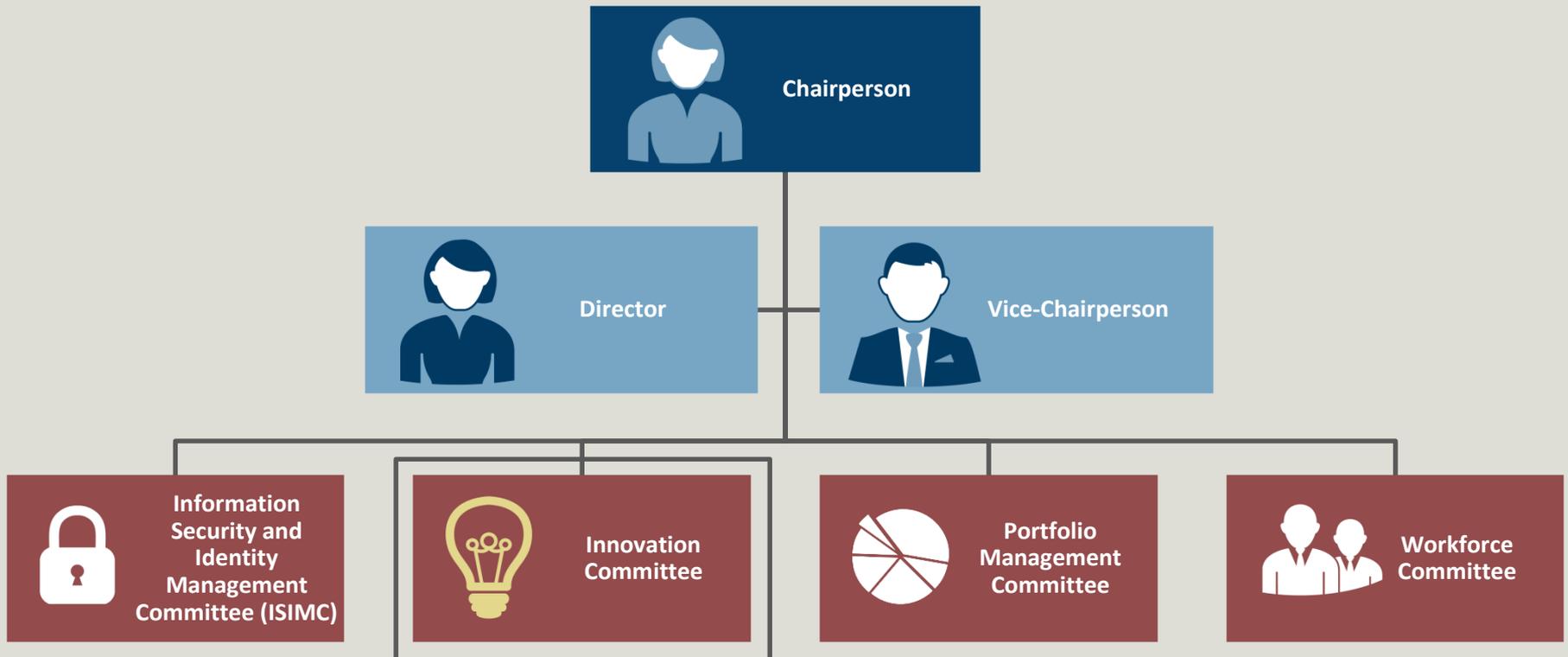
## Appendix

# The Federal CIO Council

*The Federal CIO Council is the principal interagency forum on Federal agency practices for IT management*



*The Federal CIO Council mission is to improve practices related to the design, acquisition, development, modernization, use, sharing, and performance of Federal Government information resources.*

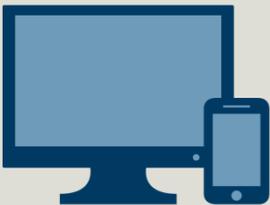


# The Innovation Committee

*The Federal CIO Council created the Innovation Committee to enable Agency mission delivery, improve customer service, maximize return-on-investment, and support emerging IT needs*



Chaired by **Margie Graves** (DHS Deputy CIO) and **Bill Zielinski** (SSA CIO), the **Innovation Committee** focuses on relevant topics such as the use of modern technologies to deliver digital services to citizens and businesses, deployment of mobile technology within Government, modular IT development strategies, and using Federal data as a strategic resource to enable Agency mission delivery and to grow the economy.



For more information on the Federal CIO Council, the Innovation Committee, or products and resources, visit **<https://www.CIO.gov>**.